

**PLANNING STATEMENT – FORMER  
BELLENDEN PRIMARY SCHOOL,  
REEDHAM STREET, LONDON, SE15 4PF**

July 2017

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## **1.0 Introduction**

### **1.1 Summary**

- 1.1.1 This is an application for planning permission for a school building for Beormund Primary School to accommodate up to 45 pupils with Social, Emotional and Mental Health (SEMH) special needs..
- 1.1.2 The proposal will involve the demolition of the existing and vacated mainstream Bellenden Primary School buildings and the erection of a new two storey school building..
- 1.1.3 Careful consideration of Council policies and a thorough site analysis has resulted in an innovative development that would enhance the functionality and effectiveness of the school.

### **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 two storey purpose built school facility for the Beormund Primary SEMH School..
- 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 which has become vacant as a result of the relocation of Bellenden Primary School to a purpose-built facility at a different 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 – Ellis Williams Architects
- Drawings and Illustrative Material – Ellis Williams Architects
- Ecological Report – MLM Group
- Noise and ventilation Assessment – Sustainable Acoustics
- Air Quality Assessment– Watermans
- BREEAM Pre Assessment Indicator – Faithful and Gould
- Transport Statement – MLM group
- Daylight and Sunlight Assessment – Ellis Williams Architects (See D&A)
- Flood Risk Assessment – Peter Brett Associates
- Drainage Strategy – MLM Group
- Tree Assessment – Connick Tree Consultants
- Energy Statement – MLM group
- Geo-Environmental Site Investigation – Groundsure Enviro Insight
- School Travel Plan (Draft) – MLM Group

## **2.0 The Application Site and Surrounding Area**

### **2.1 Site Description & Location**

2.1.1 The subject site refers to an existing school site that was previously occupied by the Bellenden School prior to their recent move to the Former Wilkinson House nursing home site.

2.1.2. The site is borders public highway on two sides with Costa Street to the east and Reedham Street to the west to the north and south of the site exists residential properties.

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

2.1.4. The site has a Public Transport Accessibility Level (PTAL) rating of 5 which indicates a good level of accessibility to public transport modes.

## **2.2 Planning Policy Designations**

2.2.1 The key planning policy designations are as follows:

- Peckham and Nunhead Action Area
- Urban density zone
- Flood Risk Zone 1 and a Critical Drainage Area
- PTAL 5
- Air Quality Management Area

## **2.3 Surrounding Area**

2.3.1. The surrounding area consists of predominantly residential uses to the north, south, east and west of the site. There is also a church located to the southern end of the site.

## **2.4 Relevant Planning History**

2.4.1. 12/AP/1163 - Planning permission was granted for the erection of a single storey prefabricated building within school grounds to provide additional classroom, toilets and storage

2.4.2. 16/AP/1778 – Planning permission was granted for a temporary period for the installation of a double demountable classroom unit to be installed in an area of hardstanding within the grounds of the school to create additional internal space (temporary permission)

2.4.3. 17/EQ/0435 – A pre-application enquiry was submitted for the Demolition of existing building and erection of new part one, part two Primary School Building to allow for relocation of existing Beormund School.

## **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 part one, part two storey school building.

3.1.2 The proposed new school will allow for a new purpose built facility to provide an improved SEN school and provision of better facilities for pupils attending the school. The school will accommodate up to 45 pupils. A total number of 25 full time members of staff will be working at the school.

3.1.3 The proposed new building will be two storeys and will be located to the northern end of the site and up to the western edge of the site. The external play space would be to the southern end of the site. A new landscaping scheme is proposed with floodlit MUGA to the southeast of the site. A separate access to the MUGA will be proposed from Costa Street to allow for community use.

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. No parking is proposed within the site. Minibus parking would be catered for to the northern end of the site as the majority of pupils travel to school via minibus. Cycle storage is proposed for 10 spaces for teachers. Separate stores would also be provided for student bikes and scooters within the site.

3.1.7. The scheme is highly sustainable and has been designed to reach a BREEAM 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 throughout the scheme from the urban scale to the internal arrangements of the school.

3.2.3 Ecology Assessment – phase 1 habitat survey was undertaken. It also noted precautionary measures be undertaken when demolishing the building and removing vegetation from the site as there is potential for nesting birds 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 is had within the neighboring residential properties.

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 a relatively high of accessibility to public transport with a PTAL rating of five. No parking is proposed at the school, with a total of 10 cycle parking spaces proposed within the

site for teachers. The proposal is aiming to encourage more sustainable transport measures and reduce the reliance on cars.

3.2.8 Sunlight and Daylight Reports – It was deemed that given the relatively small scale of the development that a statement would not be required. However, analysis has been provided by the architects as part of the Design and Access Statement to demonstrate that the proposal would have no material impact on daylight or sunlight.

3.2.9 Flood Risk and drainage Assessment – An FRA and drainage statement has been prepared as part of the site which notes that the site is protected by flood defenses; it also notes that there is limited risk to surface water flooding. The drainage report sets out mitigation measures in relation to drainage.

3.2.10. Arboricultural Impact Assessment – The survey and impact assessment notes that, in total 21 individual trees were recorded during the survey process within or adjacent to the site, 5 B class, 15 C class and one U. A total of 7 trees are required to be removed, however these will be mitigated through a robust landscape programme.

3.2.11 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.

3.2.12 Geo-Environmental Site Investigation report – A site investigation report has been prepared as part of this submission which indicated the most significant contamination issue would be from made ground from previous developments. It recommends further intrusive investigation is planned to supplement the current investigation data and the results

3.2.13. School Travel Plan. – A draft school Travel Plan will be prepared with the Councils School Travel Plan co-ordinator and School Management.

## **4.0 Relevant Planning Policies**

### **4.1 Government Guidance**

4.1.1 National Planning Policy Framework (NPPF) March 2012 – 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 4 'Promoting Sustainable Transport' notes under paragraph 32 that "All developments that 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.

4.1.4. Section 7 Requiring good design paragraph 58 states that Local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics.

4.1.5 Section 8 Promoting healthy communities states at paragraph 72 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.

They should:

- give great weight to the need to create, expand or alter schools; and
- work with schools promoters to identify and resolve key planning issues before applications are submitted'.

4.1.6 Section 10 - 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:

- comply with adopted Local Plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and
- take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

4.1.7 Section 11 - Conserving and enhancing the natural environment, Paragraph 109 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 CO<sub>2</sub> 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 behaviour 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 Council's 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 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.

4.3.17. 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.

4.3.18. 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 (Preferred Options stage)**

4.5.1. The New Southwark Plan is currently at Preferred Options stage, and as such is only giving limited weight when assessing planning applications. Notwithstanding this, the following policies are of relevance:

- DM9 Design of places
- DM10 Design quality
- DM21 Education places
- DM40 Flexible community uses
- DM42 Public transport
- DM43 Highways impacts
- DM44 Walking
- DM46 Cycling
- DM48 Car parking
- DM49 Parking standards for disabled people and the mobility impaired
- DM50 Protection of amenity
- DM51 Designing out crime
- DM52 Open space and open water space
- DM53 Biodiversity
- DM54 Trees
- DM55 Environmental standards
- DM56 Energy
- DM57 Reducing waste
- DM58 Land for waste management
- DM59 Environmental protection
- DM60 Improving air quality
- DM61 Reducing noise pollution
- DM62 Reducing water use and improving water quality

#### **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
- Peckham and Nunhead AAP (Area Action Plan) 2014 – Policy 8 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 enhanced education facilities with the aim of meeting the education space deficiency within the borough.

5.1.2 The existing was previously used as a school and this proposal seeks to erect a new SEMH School building on the site that will allow Beormund School to move to a purpose built facility to be dedicated to 45 pupils.

5.1.3 Policy 2.4 of the Southwark Plan asserts that planning permission will be granted for new educational establishments especially in areas of demonstrated educational deficiency but provided that opportunities are taken wherever possible to ensure that provision is made to enable the facility to be used by all members of the school. The current site was not purpose built as an ~~Inclusive Learning~~ SEMH school and has had to be altered over the years to accommodate the schools needs which results in a compromised layout that does not contain facilities that allow for an inclusive educational environment for the pupils. The proposal would provide a purpose facility that would help improve the facilities and learning experience on site for pupils.

5.1.4. 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’.

5.1.5. The School proposes new games areas, hall and other facilities which can be made available for community use and this can be secured as part of a community management plan and thus the criteria within Saved Southwark Plan Policy 2.2 and SP4 of the Core Strategy 2011 has been met.

5.1.6. The proposed alterations to the existing school would provide a sustainable building meeting at least BREEAM Very Good. Further the proposal seeks to provide renewable energy for the proposed building and this will involve the provision of photovoltaic panels.

5.1.7. Overall, the principle of the proposed development is considered consistent with the NPPF, Saved Policy 2.4 of the Southwark Plan and 3.18 of the London Plan provided there are no demonstrable negative local impacts which cannot be addressed through the appropriate use of planning conditions or obligations’.

## **5.2 Environmental Impact Assessment.**

5.2.1. The 2017 Regulations integrate Environmental Impact Assessment procedures into the framework and should only apply to those projects which are likely to have significant effects on the environment.

5.2.2. The proposal would not fall within the definitions of Schedule 1 or Schedule 2 development and as such, 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 landscaping 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 and would cater for the specific needs of the pupils within the school.

5.3.2. The proposal will offer high quality play space at ground floor with a range of quality outdoor spaces including a new MUGA, lawn, pond area and soft landscaping areas.

5.3.3. Overall, it will be of a high quality and would allow for a positive environment for the pupils and further details are provided on the landscaping plan submitted as part of the application.

## **5.4 Daylight & Sunlight**

5.4.1 A full daylight and sunlight test has not been carried out as the proposed development complied with the distance and angles tests and thus, as outlined within the BRE guidance, the proposal would not result in a noticeable impact on either daylight or sunlight.

## **5.5 Air Quality**

5.5.1 An Air Quality assessment of the proposed development has been undertaken 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 the Development is not expected to give rise to air quality impacts. As such the likely effect of the operational Development on local air quality would be not significant.

## **5.6 Overlooking, Noise and Privacy**

5.6.1. The proposed building will be situated along Reedham Street and back onto the properties along Choumert Road. In terms of overlooking, the closest properties would be situated in excess of the 12m across roads as outlined within the Residential Design Standards and as such no overlooking would ensue.

5.6.2. In terms of the potential daylight or sunlight impacts, the architects have demonstrated that the proposed school building would not bisect any 25 degree angles from any of the surrounding properties and as such it can be concluded that the proposal would accord with the BRE guidance and that there would not be any material daylight or sunlight implications.

5.6.3. 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 school which would not significantly increase the capacity of the site or change the nature of the activities undertaken within it, only significantly improve the facilities.

5.6.4. The proposal results in a ground level playground with MUGA which may increase the level of noise into the neighboring properties, particularly if it is used for community based activities into the evenings. Hours of operation of the MUGA could be reasonably restricted through the use of planning conditions to ensure that any impacts could be mitigated against.

5.6.5. Overall, it is considered that the proposed development would not result in any material increased impacts on the neighbouring 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 part one, part two storey building to contain a new purpose built SEN school use. The proposal has been developed as a response to the sites constraints and opportunities and the proposal responds to the context of the existing school and the urban context of proposed and the surrounding streets.

5.7.4. This location of the new building has been carefully chosen to have the minimum impact on neighbours and introduce a stronger and more legible presence to the streetscene along Reedham Street and Costa Street.

5.7.5. The proposed design seeks to create a sustainable and robust school that is fit for purpose with improved accessibility and level access throughout. A comfortable learning environment is key to creating a successful new building, with acoustics, ventilation and thermal comfort considered from the outset of the design.



5.7.6. The new SEN school building is two storeys high at its highest point, with a mixture of sloping and flat roofs. The proposed building would remain significantly lower than the neighboring buildings, and would be of a similar scale to the existing building which is also two storeys.

5.7.7. The proposed materials would consist of robust brickwork, and timber cladding with large areas of glazing to achieve good levels of daylight into the classrooms. The principle elevation along Reedham Street would be given relief through setting back the elevation to create a courtyard within and planting to help enliven the frontage.

5.7.8. The use of the innovative and contemporary materials results in a positive impact to the streetscene 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 Group. Their conclusions and recommendations are outlined within their Transport Statement, which is included as part of the planning application submission. A School Travel Plan is also 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. No parking is proposed with the site however there is space for three mini buses.

5.8.3. The proposal provides cycle storage for 10 external cycle parking spaces being provided in the form of Sheffield stand. Given the nature of the children attending the school, the majority of students travel to school via mini buses and as such there would be a limited number of pupils that cycle to school. Notwithstanding this, there are further areas for scooter and bike storage for pupils.

5.8.4 Adequate provision for the storage and collection of refuse and recycling waste has been provided within the scheme from within the site. Sufficient space has been included to accommodate servicing from within the site with both delivery and refuse vehicles able to access and exit the site in a forward gear. Swept path drawings have been provided within the transport assessment. 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. The school travel plan will encourage all users of the site to use alternative means of travel in order to avoid the use of car trips to and from the site. Given the scale and number of pupils attending the school, the low number of drop offs does not raise any significant concerns in relation to highway safety.

5.8.6. Overall, the proposed development would accord with the relevant Southwark Plan, Core Strategy, London Plan and NPPF policies in relation to sustainable transport.

## **5.9 Trees**

5.9.1. As part of the proposal some trees are required to be removed, and as such an Arboricultural Impact Assessment has been prepared as part of the application submission. The assessment notes 21 trees are located within the site. These include five B category, 15 C category and one U category trees. In order to implement the design proposal there will be an overall loss of seven individual trees. These include one B category tree, five C category and one U category. The report also sets out tree protection measures for the trees that are retained within the site.

5.9.2. As many trees have been retained as possible in order to deliver the school building on site, and the quality of the trees to be removed are considered low and as such their loss would not result in a significant impact on the visual amenity of the site and surrounding area. A comprehensive new landscaping and tree planting scheme is proposed as part of the scheme and details are provided on the submitted drawings. Further details including number, size and type of trees and plants to be replanted can be secured through planning conditions.

5.9.3. Overall, following the landscaping scheme being developed, the proposal would result in an increase in the number of trees and overall planting within the site which would help significantly improve the visual amenity of the site and surrounding area.

## **5.10 Wildlife and Biodiversity**

5.10.1. An ecology report has been prepared alongside this submission by the MLM Group. 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 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.

5.10.3. In terms of biodiversity enhancement, the proposal would result in significant improvements to the site with additional areas for planting and grassed areas as well as a pond in order to help improve biodiversity within the site. The use of brown/green roofs is incorporated into the scheme to improve biodiversity and surface run off.

## **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 through the use of building efficiency savings and PV panels.

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. Flood Risk and drainage**

5.12.1. The site is location within Flood Risk Zone 1 which denotes its low risk to fluvial flooding; however the site is also covered by flood defenses. The site is also at risk of pluvial, groundwater and reservoir flooding.

5.12.2. Surface and foul water drainage strategies follow the existing point of discharge into the public sewers however that attenuation would be provided on site in order to allow controlled discharge into the sewers. Given that no significant change in capacity within the site, this approach should be deemed as appropriate.

5.12.3. Surface water drainage strategy includes on site attenuation to achieve to achieve a 50% reduction in surface water run off into the public sewer, in line with the required policy requirements.

## **5.13. 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 discussion 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. These can be undertaken as part of

a S278 agreement with the highways authority without the need to be included within a 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.

## **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 Improving educational facilities for all 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.