

Committee	PLANNING COMMITTEE A	
Report Title	Sir Francis Drake Primary School	
Ward	Evelyn	
Contributors	Adonica Giborees	
Class	PART 1	31 March 2016

Reg. Nos.

DC/15/094990

Application dated

23 December 2015

Applicant

Mr D Bannister, LSI Architects LLP

Proposal

Proposed development for the expansion of Sir Francis Drake Primary School, comprising the demolition of the existing school accommodation on-site, the construction of a two-storey block accommodating 14 classrooms and other teaching spaces, an assembly/sports hall with dining facilities and studio space, external courtyard, new playground and hard games court, and hard and soft landscaping at Scawen Road, London SE8 5AE

Applicant's Plan Nos.

15132-100 Rev A (received 06 January 2016);
15132-101; 15132-102; 15132-103; 15132-110;
15132-111; 15132-112; 15132-120; 15132-121;
15132-130 (received 29 December 2016);

Design & Access Report (LSI Architects LLP), dated December 2015

- Appendix A: Visualisations (by LSI Architects LLP)
- Appendix B: Planning Drawings
- Appendix C: Air Quality Assessment, dated 22nd December 2015 (by Resource and Environmental Consultants Limited)
- Appendix D: Preliminary Ecological Appraisal, dated January 2014 (by Mott MacDonald)
- Appendix E: Community Infrastructure Levy form
- Appendix F: Construction Method Statement, dated 16th December 2015 (by Kier Group)
- Appendix G: Crime Prevention Report (by LSI Architects LLP)
- Appendix H: Climate-Based Daylight Modelling report, dated 23rd November 2015 (by Kier Group)
- Appendix J: School Travel Plan, dated December 2015 (by Vectos)

- Appendix K: Energy Statement, Rev 02, dated 14/12/2015 (Van Zyl & de Villiers Limited Consulting Engineers)
- Appendix L: Flood Risk Assessment, Rev P4, dated February 2016 (by Fluid Structural Engineers and Technical Designers Limited)
- Appendix M: Phase 1 and 2 Desk Study and Preliminary Investigation Report for a Proposed School Redevelopment, Issue No. 1, dated 07 December 2015 (by Geosphere Environmental Limited)
- Appendix N: Planning Statement, dated December 2015 (by LSI Architects LLP)
- Appendix O: Statement of Community Engagement (by LSI Architects LLP)
- Appendix P: Transport Statement, dated December 2015 (by Vectos)
- Appendix Q: Site Waste Management Strategy (no author)

Background Papers

- (1) Case File DE/191/D/TP
- (2) Local Development Framework Documents
- (3) The London Plan

Designation

Area of Archaeological Priority, Public Transport Accessibility Level 2 (PTAL 2), Flood Risk Zone 2/3

Screening

The development is considered to fall within Schedule 2, Category 10b (urban development project) of the Environmental Impact Assessment (EIA) Regulations. Consequently, an EIA is not required.

A Scoping Opinion pursuant to Regulation 13 of the Regulations was issued in September 2014.

1.0 Property/Site Description

- 1.1 The application site is home to Sir Francis Drake Primary School, a 5,100 square metre site containing a number of single-storey school buildings linked by external canopy walkways, and several scattered porta-cabins. The original school building was constructed during the 1960s and consists of flat roof classrooms exposed on several sides. A caretaker's house is located in the north-eastern corner of the site. The playground is predominantly hard surfaces that slope down towards Grinstead Road. There are several trees scattered across the site.
- 1.2 The boundary of the site is well defined with existing brick walls to the southern end of the site, and metal fencing to the north sections of the eastern and western boundaries. The main access to the school is on Scawen Road to the east, whilst a vehicle access for servicing and deliveries is located on Trundley's Road to the

west. Refuse vehicles and kitchen delivery vehicles presently stop on the single yellow lines on Trundley's Road.

- 1.3 Sir Francis Drake Primary School is presently a 210 pupil, 1-form entry school.
- 1.4 The application site is bound by Scawen Road to the east, Grinstead Road to the south, and Trundley's Road to the west. Abutting the site to the north are Victorian residential properties, whilst across Scawen Road to the east is Deptford Park.
- 1.5 The Southern Railway Line and London Overground line runs roughly in an east-west direction to the south of the site at the junction of Grinstead and Trundley's Roads. Deptford Park Primary School (a 3-form entry school) is located on the opposite side of Deptford Park. Across Grinstead Road to the south of the application site is the Neptune Works site which has been granted planning permission for its redevelopment (see discussion overleaf).
- 1.6 There is a partially covered cycle parking facility which is located to the south of the pedestrian access off Scawen Road. The cycle parking facility includes 5 Sheffield type stands (provides capacity for up to 10 bicycles). There is one on-site car parking space which can be accessed via the gate on Trundley's Road. Staff who currently drive to work park their vehicles in the neighbouring residential streets.
- 1.7 There are a number of bus stops within 10 minutes walking distance of the site, which have regular services to London Bridge, Victoria and Lewisham. The nearest bus stop is on Trundley's Road and the closest mainline station, just over 0.5km from the site, is South Bermondsey. Surrey Quays and New Cross station are the closest Underground stations, which are both just over 0.5km from the site. As part of the new East London Line, a new station is proposed at Surrey Canal Road.
- 1.8 The site is not located within a conservation area, nor is it subject to an Article 4(2) Direction. The application site does not contain any listed buildings, nor is it in the vicinity of any, however the site is located in an Area of Archaeological Priority.
- 1.9 The application site has a Public Transport Accessibility Level (PTAL) of 2. Trundley's Road is a B classified road, whilst Scawen Road and Grinstead Road are both unclassified.

2.0 Planning History

- 2.1 DC/98/42885 (granted 4 June 1998) was for the siting of a single storey porta-cabin at Sir Francis Drake Primary School.
- 2.2 DC/01/50369 (granted 15 February 2002) was for the siting of a temporary single storey porta-cabin adjacent to the car park and assembly hall at Sir Francis Drake Primary School.
- 2.3 DC/03/53750 (granted 27 June 2003) was for the siting of two single storey porta-cabins at Sir Francis Drake Primary School.

- 2.4 DC/07/66283 (granted 29 September 2007) was for the construction of a 55 square metre infill extension to the school adjacent to Trundley's Road
- 2.5 DC/09/70711 (granted 20 April 2009) was for the construction of a porta-cabin for use as a music room at Sir Francis Drake Primary School.

Surrounding Area

- 2.6 The site on the opposite side of Grinstead Road from the application site has been granted planning permission (reference DC/10/75331) for the demolition of the existing buildings at Neptune Works, Grinstead Road, and the phased redevelopment of the site. The development will provide 6 blocks and 10 mews houses between 3 and 12 storeys, providing 199 residential units and 1,973 m² of non-residential floor space. The development will also contain parking for up to 276 cycle spaces, 10 motorbike/scooter spaces and 60 vehicular spaces including 7 disabled spaces.

3.0 Current Planning Application

The Proposal

- 3.1 Planning permission is sought for the proposed development for the expansion of Sir Francis Drake Primary School, comprising the demolition of the existing school accommodation on-site, the construction of a two-storey block accommodating 14 classrooms and other teaching spaces, an assembly/sports hall with dining facilities and studio space, external courtyard, new playground and hard games court, and hard and soft landscaping at Scawen Road, London SE8 5AE.
- 3.2 The proposal will enable a total of 420 pupils and 85 staff members, doubling the current number of staff and pupil capacity.
- 3.3 The applicant proposes to phase the demolition and construction of buildings to enable the school to continue operations.
- 3.4 The proposed development will comprise one building located at the southern end of the site, with play areas to the rear. The building itself will be U-shaped, and contain a central courtyard fronting Grinstead Road. All classrooms will face the playground to the rear, and the ground floor classrooms will have direct access to the outdoor play area. Double height voids are located over the entrance and learning resource centre to bring light into the circulation areas. Group breakout spaces will be created along the corridor, and staff base and work rooms are split to provide a greater variety of areas. The hall support areas including the kitchen and plant will be located adjacent to the Trundley's Road boundary to enable direct servicing from the road.
- 3.5 The proposed building will have a gross floor area of 2220.10 square metres and a maximum height of 7.9m, with the assembly/sports hall being single level design with a height of 5.7m. The kitchen area is single storey allowing the roof to be lowered and rooftop planting on top.
- 3.6 The proposed building will be clad with an off-white render finish for the upper floor, and light brown patterned brick for the ground floor and assembly/sports hall. The roof will be single ply roof membrane. Windows are proposed to be composite aluminium with powder coated grey finish. Window reveals and cavity

closures are polyester powder coated colours gradient from blue to green to yellow. Louvres are proposed to be integrated into windows of each classroom with their colour to match the frames. Doors will also be aluminium with internal framing members / external capping finished in standard RAL powder coated colour.

- 3.7 Boundary treatment will consist of retention of the existing brick wall and metal palisade fencing, and new metal mesh fencing to the proposed entrance court. Bespoke timber fencing is proposed for the courtyard fronting Grinstead Road.
- 3.8 The outdoor area will consist of a new tarmac hard games court, rubberised surfaces, and grassed areas (both seeded and artificial). Proposed external lighting will be surface mounted clear plastic luminaires to walls.
- 3.9 Entry into the school site and building for pupils, teachers, and visitors will be off Scawen Road. Access for delivery and servicing vehicles will be from Trundley's Road, with a dedicated kitchen access located on Trundley's Road. Refuse collection at the new school will continue to be serviced from the existing gated access on Trundley's Road.

Supporting Documents

- 3.10 Design & Access Report (prepared by LSI Architects LLP)
- 3.10.1 This document provides a comprehensive description of the site, outlines the site conditions that have influenced the scheme, sets out to describe the design principles behind the proposed development and explains the rationale for the scheme. The document covers site context, opportunities, design principles, connectivity, layout, scale, appearance, access, landscape and sustainability.

The remaining documents provided as part of the application form appendices to the Design and Access report.

- 3.11 Air Quality Assessment (prepared by Resource and Environmental Consultants Limited)

An Air Quality Assessment was undertaken to determine baseline conditions, consider site suitability for the proposed end-use and identify suitable mitigation measures as required.

Dispersion modelling was undertaken in order to predict pollutant concentrations across the proposed development site as a result of emissions from the local highway network. The results indicated relatively high levels of pollutant concentrations over the ground floor however concentrations were considered acceptable at the first floor. As such, appropriate mitigation such as high specification of window tightness has been included within the development proposals.

In summary, based on the assessment results, air quality issues are not considered a constraint to planning consent for the proposed development, subject to the inclusion of relevant mitigation measures.

3.12 Preliminary Ecological Appraisal (prepared by Mott MacDonald)

This report provides an initial assessment of the ecological importance of the habitats in the areas relevant to the redevelopment of the school, and the potential for these areas to support protected ecological features and species. The report identifies and assesses the nature conservation value of the habitats and species near and adjacent to the school, and provides recommendations on mitigation and compensation measures and, as appropriate, for more detailed ecological investigations.

The report concludes that Sir Francis Drake Primary School is deemed to have suitable habitats to support species of breeding birds but potential to support other protected species is negligible.

The report recommends that any vegetation clearance or building demolition on site should be conducted outside of the breeding bird season (between March and August). If such works cannot avoid the breeding bird season, it is recommended that a nesting bird check is conducted on site 24 hours prior to any works being undertaken. If an occupied nest is discovered, it must be left undisturbed until the chicks have fledged the nest and an ecologist has confirmed that the nest is no longer in use.

3.13 Construction Method Statement (prepared by Kier Group)

The Construction Method Statement details the construction proposals for the redevelopment of Sir Francis Drake Primary School. Condition surveys of the existing school conclude the buildings are in a poor state of repair and are expensive to maintain.

The Construction Method Statement sets out logistics with regard to organisation of the site, such as site management, site hours, site establishment, fire procedures, notification of neighbours in relation to specific works, advance notification of road closures, pavement stopping-up, movement and hoisting of materials, delivery and storage, waste disposal, scaffolding and hoardings. It also sets out the scope of works and methodologies for demolition and construction, including risk and resource management, as well as dust, noise and vibration mitigation measures.

3.14 Crime Prevention Report (prepared by LSI Architects LLP)

This document identifies design elements for security and crime prevention which have informed the scheme. Measures have been used such as closed circuit television (CCTV), unopenable windows facing the street, internal drainpipes to prevent climbing onto the building, anti-climb fencing, video entry to visitor and kitchen entrances, supervised pupil access, and landscape concepts to enable clear views through and around the playground areas.

3.15 Climate-Based Daylight Modelling Report (prepared by Kier Group)

The Priority School Building Programme (PSBP) output specification requires the use of Climate-Based Daylight Modelling (CBDM) to calculate the incident illuminance across the working plane of each space, during core-hours, throughout a typical year. A CBDM was undertaken in line with the Education

Funding Agency (EFA) Daylight Design Guide (Revision 2) and the Facilities Output Specification (FOS).

A range of daylight design solutions were assessed throughout this study, in order to find the most efficient, cost effective and practical solution that meets the EFA requirements, whilst providing flexible control over the visual environment. This ensures visual comfort for the occupants whilst meeting the EFA output specification targets.

A flexible internal blind solution was considered the most effective and efficient, when compared to other more architectural interventions such as light shelves, external louvres, brise soleil, etc.

The report found that overall, the proposed blinds provide a flexible and cost effective design solution, which addresses both the performance needs of the space and visual comfort of the occupants.

3.16 Energy Statement (prepared by Van Zyl & de Villiers Limited Consulting Engineers)

This report estimates the predicted carbon footprint (as defined in Approved Document Part L) and considers various options for Low and Zero Carbon (LZC) technologies for the new school building.

The feasibility study concludes that principles of enhancing the thermal envelope of the building and applying energy efficient products and techniques have been applied effectively and efficiently to achieve compliance with ADL2013 without the need for sophisticated technologies.

3.17 Flood Risk Assessment (prepared by Fluid Structural Engineers and Technical Designers Limited)

Original Flood Risk Assessment: Report dated December 2015

The original Flood Risk Assessment report initially submitted with the application sets out the potential sources of flooding, vulnerability and compatibility of the proposed development, an assessment of the flood impact, and mitigation measures.

The report concluded that, whilst the proposed development will be located within Flood Zone 3, the site and immediate surrounding area is afforded protection from local flood defences. The actual risk of fluvial flooding to the proposed development will therefore be residual in nature, being restricted to a breach of the defences, so can therefore be considered to be low.

Overall, based on the information available, this Flood Risk Assessment found that the risk of flooding to the proposed development from all other sources is considered to be low. Mitigation measures to ensure flood risk to the school and its users is kept to a minimum include recommended finished floor levels, the incorporation of flood resilient construction techniques, and the development of an appropriate emergency plan.

Updated Flood Risk Assessment: Report dated February 2016

An updated Flood Risk Assessment was provided by the applicant in response to an objection received by the Environment Agency. This updated report sets out the following (those points that differ from the original Flood Risk Assessment):

- The finished ground floor level of the new school building will be set at 2.20m AOD (Above Ordinance Datum, being the Statutory Flood Defence Level in this reach of the Thames). The external levels will be largely similar to the existing scenario in order to tie in with the new building and all boundaries.
- It is proposed to connect the foul discharge to the public combined sewer network in Scawen Road via a new connection to the existing run. This will be subject to the consent/approval of Thames Water.
- Based on the current 200 year breach flood level of 1.86m, as advised by the Environment Agency, and a proposed finished ground floor level of 2.20m AOD, the new school building would remain dry in such an event. This represents an improvement on the existing scenario. In the future climate change events, it is apparent that the new building could potentially be inundated up to a depth of 2.43m. Again, this is an improvement on the existing scenario.

The London Borough of Lewisham's Strategic Flood Risk Assessment guidance stipulates that building finished ground floor levels should be set 300mm above the breach scenario flood level. The updated Flood Risk Assessment concludes that, with a proposed finished ground floor level of 2.20m AOD, this requirement will be met in the current 200 year breach scenario.

3.18 Phase 1 and 2 Desk Study and Preliminary Investigation Report for a Proposed School Redevelopment (prepared by Geosphere Environmental Limited)

This report assesses the ground conditions at the site for use in the design and construction of the proposed development, as well as to assess the potential risk to human health and the environment.

Based upon the findings of the desk study and walkover, a number of potential contaminant sources and pathways to potential receptors have been identified.

The report makes recommendations with regard to a deep ground investigation being required if piled foundations are proposed, the undertaking of further gas monitoring visits, and the development of a Remediation Method Statement to detail the proposed remediation strategy to be submitted and approved by the Local Planning Authority.

3.19 Planning Statement (prepared by LSI Architects LLP)

This statement describes the relevant planning policies. A brief assessment of planning considerations is provided (ensuring equal life chances for all, education facilities, climate change mitigation, minimising carbon dioxide emissions, sustainable design and construction, renewable energy, green roofs, waste self-sufficiency, cycling, walking and parking, local character, and architecture).

3.20 Statement of Community Engagement (prepared by LSI Architects LLP)

This document sets out the steps the applicant has taken in engaging with the local community, and includes how the views of the community have been sought and taken into account in the formulation of the proposal.

As part of the community engagement strategy, the applicant has undertaken initial discussions with Council's planning department, and held a public consultation event. The Statement of Community Engagement sets out the responses received, and how the comments have been incorporated into the planning application. It also includes a petition submitted against proposals relating to the new build of Sir Francis Drake Primary School, and the applicant's response to the letter accompanying the petition.

Section 4.0 below further details the consultation carried out by the applicant prior to submission of the planning application.

3.21 Transport Statement (prepared by Vectos)

The Transport Statement reviews the current and proposed sustainable travel options available for staff and pupils, and considers the potential transport effects of the increases in pupil and staff numbers.

The Transport Statement concludes that the forecast additional trips resulting from the enlarged Sir Francis Drake Primary School are not anticipated to be detrimental to the safety or operation of the local highway network, and that all additional parking requirements can be easily catered for on-street. The Transport Statement considers that Council infrastructure improvements for walking, cycling and scooting will mitigate the forecast increases, and as such the new school is unlikely to result in a significant increase on individual public transport services.

3.22 School Travel Plan (prepared by Vectos)

The Travel Plan seeks to put in place the management tools that are necessary to enable teachers, administration staff, parents, and school children to make informed decisions regarding their travel to the site and to encourage the use of sustainable modes. This will serve to minimise the adverse impacts of their travel to/from the school.

The Travel Plan describes the accessibility of the site by all modes, existing travel patterns, objectives and targets to be achieved, measures and initiatives, a Travel Plan Strategy for the management, development, monitoring and review of the Travel Plan, and an action plan.

3.23 Site Waste Management Strategy (no author)

The Site Waste Management Strategy sets out that a Site Waste Management Plan will be developed during the pre-commencement period. Initiatives will include a system of centralised rubbish skips to be removed from site on a regular basis, meeting BREEAM requirements, and implementation of waste reduction practices and procedures to maximise the segregation of construction waste.

4.0 Consultation

4.1 This section outlines the consultation carried out by the applicant prior to submission, and the Council following the submission, of the application and summarises the responses received. The Council's consultation exceeded the minimum statutory requirements and those required by the Council's adopted Statement of Community Involvement.

Pre-Application Consultation

4.2 The applicant engaged in discussions with local residents prior to the submission of this application. A public exhibition was held on the 18th February 2015. Details of the exhibition are provided in the applicants Statement of Community Involvement.

4.3 In addition the applicant's team had pre-application discussions with Council officers.

Council Consultation

4.4 Various site notices were displayed in the vicinity of the site on 13th January 2016, and a public notice placed in the local newspaper on 13th January 2016.

4.5 Letters were sent to 867 residents and business in the surrounding area and the relevant ward Councillors. Letters to residents and businesses included an invite to a drop-in session arranged for 19th January 2016.

4.6 Internal consultees included Council's Environmental Protection, Highways, Environmental Sustainability, Children and Young People, and Legal Services departments, and Ecological Regeneration Manager.

4.7 External consultees included the Environment Agency, Thames Water, Network Rail, Transport for London, and Lewisham's Met Police Design Out Crime Officer.

4.8 In accordance with the Council's Statement of Community Involvement, a drop-in session was held on 19th January 2016 at Sir Francis Drake Primary School. The event was arranged in order for members of the public to view the planning application drawings and to ask both the applicant's team and Lewisham planning officers questions about the proposals.

Written Responses received from Local Residents and Organisations

4.9 At the time of writing this report, 4 letters of objection / comments had been received from members of the local community residing at Flat 154 Inwen Court, 53 Crooke Road, 55 Alloa Road, and 25 Bence House, Rainsborough Avenue. The following points were raised:

- No concern raised with the principle of redevelopment of the site.
- Local authority should input some Section 106 contributions to provide better quality development and thus longevity.

- Inadequate sports and recreational space and an unused / unusable roof space; proposal should provide an extra rooftop play space, and an additional sports hall.
- Inadequate toilet facilities that will be impossible to safely maintain to appropriate hygiene standards; an increased ratio of toilets should be provided.
- Inadequate intervention space to support children with special education needs and disability; larger classroom sizes should be provided.
- Dispute that there are always large numbers of available parking spaces in the vicinity of the site, as stated in the Transport Statement.
- Application does not take account of any future proofing; specifically, the development at Neptune Wharf will bring significant parking to the area, given the number of parking spaces allocated for the planned housing which does not include shopping traffic.
- Concern that existing traffic and parking congestion issues will be worsened when the volume increases.
- Comment that roads and pedestrian access routes around the school are hazardous, particularly the rail tunnel area linking the school to Surrey Canal Road – effective transport plans should be in place so that the route to and from the school, given increased traffic, is made safer and diverts foot traffic around the accident black spot under the rail arches.
- Concern raised with regard to timing of construction of Sir Francis Drake Primary School and the Neptune Wharf site, the volume of construction traffic, and the impact on the local roads and safety of children. The volume of workmen on the Neptune Wharf site will increase the demands on the parking within the area.
- Comment that energy from the South East London Combined Heat and Power network should be diverted so that the school benefits from local heating and can benefit longer term from efficiency savings.

Written Responses received from Statutory Agencies

4.10 Comments were received from the following Statutory Agencies as part of the consultation process:

- The Environment Agency
- Metropolitan Police Service: Designing Out Crime Officer
- Transport for London
- Network Rail

4.11 *The Environment Agency*

The Environment Agency objected to the proposal on the grounds that the original Flood Risk Assessment (FRA) was inadequate. Concerns were raised with respect to groundwater protection and contaminated land. Reasons for objecting were as follows:

- The submitted FRA does not include modelled flood levels for the site in the event of a breach in the Thames tidal defences, nor does it provide proposed finished floor levels for the development, merely indicating that they will be no lower than existing.
- An FRA should make a comparison of the modelled flood level with ground floor finished floor levels to indicate the potential depth of inundation at the site. The FRA therefore fails to properly assess the risk posed to future occupants of the proposed school and consequently the Environment Agency are unable to confirm whether the mitigation measures it proposes to minimise the impact of flooding are appropriate.

Since the objection was received from the Environment Agency, the applicant has provided an updated FRA to address the matters raised. The Environment Agency has reviewed the updated FRA and on this basis has removed their previous objection.

Further comments were made, and planning conditions recommended as follows:

- Flood risk management –
 - That ground floor finished floor levels be set above the minimum 300mm above the 1 in 200 year breach level plus climate change, in line with Table 7.4.4 of Lewisham’s Strategic FRA, to minimise flood risk.
 - That consideration be given to the use of flood resistant and resilient measures such as barriers on doors, windows and access points at the ground floor level and routing electrical services from a higher level downwards so that plug sockets are located above possible flood levels.
 - That the applicant consult with the Council’s building control department when determining whether particular flood resistant and resilient measures are appropriate and effective.
 - That the applicant prepares a flood evacuation plan for all site users showing access to the first floor as a safe haven, for approval by the Council’s emergency planning department.
 - That the applicant consult with the Council’s drainage team for advice on managing the surface water drainage for this proposal.
 - That the applicant registers with the Environment Agency’s ‘FloodLine’ service.
- Groundwater protection and contaminated land
 - That a remediation strategy be submitted, approved, and implemented should any contamination not previously identified be identified during development.
 - That no infiltration of surface water drainage into the ground is permitted.
 - That piling or any other foundation designs using penetrative methods shall not be permitted.
 - That handling, transport, treatment and disposal of contaminated soil or materials are subject to waste management legislation.
 - That developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British standards.

- That hazardous waste with a total quantity of 500kg or greater in any 12 month period is produced or taken off the site, the developer will need to register with the Environment Agency as a hazardous waste producer.

The abovementioned recommendations can be imposed by way of planning conditions and/or informatives.

4.12 *Metropolitan Police Service: Designing Out Crime Officer*

The Designing Out Crime Officer for the Metropolitan Police Service does not object to the proposal. The following was noted, however:

- Should the application proceed, it should be able to achieve the security requirements of Secured by Design with the guidance of Secured by Design New Schools 2014 and close liaison with the South East Designing Out Crime Officer. Recommended that a 'Secured by Design' condition be attached to any permission granted in connection with this application, and that the wording is such that the development will follow the principles and physical security requirements of Secured by Design.
- The provision of certified products to meet physical security requirements – request that the benefits of certified products be pointed out to the applicant.

4.13 *Transport for London*

Transport for London (TfL) does not object to the proposal. It was noted however, that TfL will support the proposal if the following points are addressed in an appropriate manner:

- The proposal massively increases the provision of cycle parking from 10 spaces to 70 spaces. Therefore staff and older pupils are encouraged to cycle to school as a regular travel habit.
- TfL supports the car-free development and appreciates that the Transport Assessment includes a parking survey which identifies the provision of a disabled parking bay. Given there is no Blue Badge parking proposed, it would be useful to clarify the arrangement and drop-off/pick-up points in the Travel Plan.
- TfL has no comment on the arrangement of construction as the Council is the highway authority of Scawen Road. It is recommended to check with the Council's Highways Officer to ensure that the construction arrangement is acceptable from the borough's point of view.

4.14 *Network Rail*

Network Rail has not objected to the proposal, but note the following:

- Given the proposed use of a mobile crane and its position as per the Construction Method Statement, no interface/risk to Network Rail assets is envisaged.

4.15 No response was received from the following Statutory Agencies that were consulted:

- Thames Water

Highways and Transportation

4.16 The Council's Highways Officer has no objections to the proposal, however has made the following comments:

- The Transport Statement provided with the application states that it is not necessary to implement a Delivery Servicing Plan due to there likely being no increase in the number of servicing trips associated with the increase in pupil and staff numbers. However it is not clear where exactly along Trundley's Road the loading / delivery will take place. To ensure delivery and servicing is undertaken in a safe location, the loading / delivery bay should be formalised. A Delivery and Servicing Plan is required to demonstrate that loading in the location proposed can be undertaken in a safe manner for both pedestrians and traffic.
- A safety audit is also be required to assess the suitability of the loading / servicing / delivery facilities.
- It would be appropriate for the Travel Plan submitted as part of the application to be reviewed within 6 months of the school intake reaching full capacity (420 pupils).
- The Construction Method Statement was submitted prior to on-site discussions between the applicant's team and Council's Highways department. Therefore the Construction Method Statement needs to be updated to reflect and secure those discussions.
- The proposed development would benefit from improvement works in the surrounding road network. Specifically, the applicant will need to secure the implementation of the following works to the highway, in accordance with a scheme and programme to be submitted to the local planning authority within one (1) month of the date of the planning permission and agreed with the Highways Authority:
 - Improve the management of parking controls on Scawen Road through the provision of yellow lines, school zig-zags and guard railing.
 - Works are also required to provide improved pedestrian crossing facilities on Scawen Road linking the school to Deptford Park and to the south-east of the site on Grinstead Road.
 - The approved works will be implemented and completed in full accordance with the agreed scheme.

School Property Officer, Children and Young People

4.17 The school's property officer in the Council's Estate Management division of the Children and Young People (CYP) department has raised the following matters:

- The proposal of closing off some pavements around the grounds on Grinstead and Trundley's Roads would have a direct impact on pedestrian

access on a busy road. Concerns were raised about what arrangements might be needed to ensure that children cross these roads where it is safe rather than where it is convenient for them to reach the school.

- The contractor's proposed site boundary within the school appears to be placed against the existing building within the school which is expected to continue as normal without any external play space. The positioning of the hoarding will block out natural light into the classrooms on this elevation but it may affect their ability to open windows.
- The Council's Fire Consultant has raised concerns about fire evacuation routes which will be affected by the positioning of the hoardings. CYP would like to be involved with the Health and Safety Plan and Fire Safety Plan to ensure that pupils remain in a safe building. Internal fire safety requirements regarding fire compartmentation and fire door locations should also be discussed.

5.0 Policy Context

Introduction

5.1 Section 70(2) of the Town and Country Planning Act 1990 (as amended) sets out that in considering and determining applications for planning permission the local planning authority must have regard to:-

- (a) the provisions of the development plan, so far as material to the application,
- (b) any local finance considerations, so far as material to the application, and
- (c) any other material considerations.

A local finance consideration means:

- (a) a grant or other financial assistance that has been, or will or could be, provided to a relevant authority by a Minister of the Crown, or
- (b) sums that a relevant authority has received, or will or could receive, in payment of Community Infrastructure Levy (CIL)

5.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) makes it clear that 'if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise'. The development plan for Lewisham comprises the Core Strategy, the Development Management Local Plan, the Site Allocations Local Plan and the Lewisham Town Centre Local Plan, and the London Plan. The National Planning Policy Framework (NPPF) does not change the legal status of the development plan.

National Planning Policy Framework

5.3 The NPPF was published on 27 March 2012 and is a material consideration in the determination of planning applications. It contains at paragraph 14, a 'presumption in favour of sustainable development'. Annex 1 of the NPPF provides guidance on implementation of the NPPF. In summary, this states in

paragraph 211, that policies in the development plan should not be considered out of date just because they were adopted prior to the publication of the NPPF. At paragraphs 214 and 215 guidance is given on the weight to be given to policies in the development plan. As the NPPF is now more than 12 months old paragraph 215 comes into effect. This states in part that ‘...due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given)’.

- 5.4 Officers have reviewed the Core Strategy for consistency with the NPPF and consider there is no issue of significant conflict. As such, full weight can be given to these policies in the decision making process in accordance with paragraphs 211, and 215 of the NPPF.

Other National Guidance

- 5.5 On 6 March 2014, DCLG launched the National Planning Practice Guidance (NPPG) resource. This replaced a number of planning practice guidance documents.

London Plan (March 2015)

The London Plan policies relevant to this application are:

Policy 1.1 Delivering the strategic vision and objectives for London
Policy 2.1 London in its global, European and United Kingdom context
Policy 2.2 London and the wider metropolitan area
Policy 2.3 Growth areas and coordination corridors
Policy 2.9 Inner London
Policy 2.13 Opportunity areas and intensification areas
Policy 2.14 Areas for regeneration
Policy 3.1 Ensuring equal life chances for all
Policy 3.2 Improving health and addressing health inequalities
Policy 3.16 Protection and enhancement of social infrastructure
Policy 3.18 Education facilities
Policy 4.1 Developing London's economy
Policy 4.12 Improving opportunities for all
Policy 5.1 Climate change mitigation
Policy 5.2 Minimising carbon dioxide emissions
Policy 5.3 Sustainable design and construction
Policy 5.7 Renewable energy
Policy 5.12 Flood risk management
Policy 5.13 Sustainable drainage
Policy 5.18 Construction, excavation and demolition waste
Policy 5.21 Contaminated land
Policy 6.3 Assessing effects of development on transport capacity
Policy 6.9 Cycling
Policy 6.10 Walking
Policy 6.12 Road network capacity
Policy 6.13 Parking
Policy 7.1 Building London's neighbourhoods and communities
Policy 7.2 An inclusive environment
Policy 7.3 Designing out crime

Policy 7.4 Local character
Policy 7.5 Public realm
Policy 7.6 Architecture
Policy 8.3 Community infrastructure levy

London Plan Supplementary Planning Guidance (SPG)

The London Plan SPG's relevant to this application are:

Sustainable Design and Construction (2006)

London Plan Best Practice Guidance

5.6 The London Plan Best Practice Guidance's relevant to this application are:

Control of dust and emissions from construction and demolition (2006)

Core Strategy

5.7 The Core Strategy was adopted by the Council at its meeting on 29 June 2011. The Core Strategy, together with the Site Allocations, the Lewisham Town Centre Local Plan, the Development Management Local Plan and the London Plan is the borough's statutory development plan. The following lists the relevant strategic objectives, spatial policies and cross cutting policies from the Lewisham Core Strategy as they relate to this application:

Spatial Policy 1 Lewisham Spatial Strategy

Spatial Policy 2 Regeneration and Growth Areas

Core Strategy Policy 8 Sustainable design and construction and energy efficiency

Core Strategy Policy 9 Improving local air quality

Core Strategy Policy 10 Managing and reducing the risk of flooding

Core Strategy Policy 15 High quality design for Lewisham

Core Strategy Policy 20 Delivering educational achievements, healthcare provision and promoting healthy lifestyles

Development Management Local Plan

5.8 The Development Management Local Plan was adopted by the Council at its meeting on 26 November 2014. The Development Management Local Plan, together with the Site Allocations, the Lewisham Town Centre Local Plan, the Core Strategy and the London Plan is the borough's statutory development plan. The following lists the relevant strategic objectives, spatial policies and cross cutting policies from the Development Management Local Plan as they relate to this application:

5.9 The following policies are considered to be relevant to this application:

DM Policy 1	Presumption in favour of sustainable development
DM Policy 22	Sustainable design and construction
DM Policy 23	Air quality
DM Policy 24	Biodiversity, living roofs and artificial playing pitches
DM Policy 25	Landscaping and trees
DM Policy 26	Noise and vibration
DM Policy 27	Lighting
DM Policy 28	Contaminated land

DM Policy 30	Urban design and local character
DM Policy 35	Public realm
DM Policy 42	Nurseries and childcare

6.0 Planning Considerations

6.1 The main issues to be considered in respect of this application are:

- a) Principle of development
- b) Layout, Scale and Design
- c) Quality of School Accommodation
- b) Air Quality
- c) Ecology and Landscaping
- d) Designing Out Crime
- e) Daylight Modelling
- f) Sustainability and Energy
- g) Flood Risk
- h) Land Contamination
- i) Highways and Traffic Issues – transport statement, travel plan, construction.
- j) Construction Management
- k) Waste Management
- l) Residential Amenity / Impact on Neighbouring Properties

Principle of Development

- 6.2 The site is already in use as a primary school and therefore, in principle its continued use for this purpose is considered acceptable. In terms of the increased intensity of this use, the following planning policies are relevant.
- 6.3 Paragraph 72 of the National Planning Policy Framework advises 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.”*
- 6.4 Policy 3.18 of the London Plan states that from a strategic perspective the ‘*Mayor will support provision of early years, primary and secondary school and further and higher education facilities adequate to meet the demands of a growing and changing population to enable greater education choice*’. Development 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 and projected shortage of primary school places and the projected shortage of secondary school places will be particularly encouraged.*’
- 6.5 Core Strategy Policy 20 supports the improvement of schools within the borough.
- 6.6 The proposals would increase capacity at the school from 210 pupils to 420 pupils, as well as delivering a significant improvement in the standard of educational facilities at the school.

- 6.7 On the basis of the above policy guidance, it is considered that, subject to matters of design, highways, impact on neighbouring occupiers, trees, ecology, landscape and sustainability being satisfactory, the principle of development is acceptable. These matters are described and assessed below.

Layout, Scale and Design

- 6.8 Urban design is a key consideration in the planning process. The NPPF makes it clear that national government places great importance on the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. The NPPF states that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.
- 6.9 The NPPF requires Local Planning Authorities to undertake a design critique of planning proposals to ensure that developments would function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development.
- 6.10 London Plan and Core Strategy design policies further reinforce the principles of the NPPF setting out a clear rationale for high quality urban design, whilst the Development Management Local Plan, most specifically DM Policy 30, seek to apply these principles. DM Policy 30 Urban design and local character states that the Council will require all development proposals to attain a high standard of design.
- 6.11 Core Strategy Policy 15 states that the Council will apply national and regional policy and guidance to ensure the highest quality design and the protection or enhancement of the historic and natural environment, which is sustainable, accessible to all, optimises the potential of sites and is sensitive to the local context and responds to local character. Therefore Council sets a high standard of design within the Borough.
- 6.12 Regard will therefore be given to the impact of the proposal upon the character and appearance of the surrounding streetscene.

Layout

- 6.13 The location of the school hall plays a key role in the school's functionality given its multi-functional use as an assembly and sports hall for all age groups. The layout of the development is such that the school accommodation wraps around the hall to provide a direct relationship with the communal space. The location of the hall will shield the teaching spaces from disturbance created by noise from the elevated railway line to the south-west of the site. In doing so, this will allow the teaching spaces to maximise views towards the school playground and Deptford Park to the east.
- 6.14 The courtyard is centrally located creating a 'heart space' within the development. Doors from the building which surrounds three sides of the courtyard will open out to the courtyard at ground floor level, with windows at first floor level looking over this space. This will ensure that the hall as well as teaching spaces connect with

the courtyard to enable interaction between these spaces, creating a strong relationship between the hall and courtyard.

- 6.15 The ground floor classrooms will have direct access to the outside play area, and the stairs from upper floor classrooms will lead directly to the playground. Infants will have direct access to dedicated toilet facilities from outside. The internal access configuration will enable legible access around the school for both pupils and staff.
- 6.16 Pedestrian access into the school itself will be via two separate entry points – one for pupils and one for visitors. The visitor entrance will have access control through video entry and door release from reception along with an unobstructed view over the entrance court. This access arrangement will enable greater control and surveillance.
- 6.17 The proposed building will be located close to the site's boundary with Trundley's and Grinstead Roads. Along Scawen Road, the building will be set back by approximately 6.5 metres, with a canopy extending 3m from the building. Whilst the line of the proposed building is forward of the terraced housing along Trundley's Road, an adequate separation distance is provided between the proposed development and neighbouring properties on all sides, with active frontages provided in relation to Grinstead and Scawen Road. The frontage to Trundley's Road does not have an active frontage, however this is not dissimilar to the existing situation whereby this side of the site is not actively used other than for service vehicles.
- 6.18 Overall, the proposed development will provide a sense of place and will contribute to developing a healthy community. The proposed layout responds specifically to the site, the context of the surrounding area, the local character and history.

Scale and Design

- 6.19 The proposed building, with a height between 5.7m and 7.9m, is of a scale considered appropriate in the context of established Victorian dwellings and emerging context adjacent to the Grinstead Road development (the Neptune Wharf site), and as such will not cause a detrimental impact on the appearance of the surrounding streetscene.
- 6.20 The ground floor specialist rooms facing the central courtyard will have full height curtain walling to give views across the site, and to maximise natural daylight to these areas. First floor windows are minimised to reduce the acoustic impact of the raised railway on the internal spaces.
- 6.21 The building is formed from two primary materials: Brick work at ground floor with render on the first. The ground floor brick work is considered an acceptable response architecturally and is a robust material.
- 6.22 The rendered first floor elevations are unobjectionable in this instance and interest would be provided by deep-set coloured window reveals which would act as a distinctive feature, changing colour around the building from yellow, to a range of blues and greens. The colours will also act as an internal way-finding measure, for example green at the entrance, and blue and yellow for the two internal corridors will help pupils, staff and visitors navigate around the building and would

animate the façades. In this instance the discrete use of bright colours is supported.

- 6.23 The corner hall block is full height brickwork to further define it as a separate element and reduce the scale of the proposed school as a whole. The brickwork will be patterned, and combined with the gradient effect of colours will generate visual interest. The textural effect will also break up the mass of the building. Given the otherwise blank façade to Trundley's Road, this is considered to provide design interest that would enhance the appearance of the development in this location.
- 6.24 To ensure the local planning authority can be satisfied as to the final finish of the external appearance of the building in accordance with the relevant planning policies, it is considered appropriate to require a detailed schedule and sample for approval (including erection of a sample panel of bricks on site) of all external materials and finishes, windows and external doors to be used. A condition can be imposed in this regard.
- 6.25 A bespoke 3m high timber fence is proposed to the courtyard area along Grinstead Road. This will provide privacy whilst also breaking up the façade of the development.
- 6.26 No advertisement consent has been applied for as part of the application. It is anticipated that some form of signage will be required to identify the school. Any such signage will be subject to obtaining an advertisement consent to display an advertisement bigger than 0.3 square metres (or any size if illuminated). An informative can be included to this effect on any planning permission granted.
- 6.27 Given the above, the proposed layout, scale and design of the development is considered to respond appropriately to the local context of established Victorian dwellings and emerging context adjacent to the Grinstead Road development, and with its design features will enhance the character of this area. The proposal is therefore not contrary to DM Policy 30 and Core Strategy Policy 15 which seeks to retain a high standard of design quality in the Borough.

Quality of School Accommodation

- 6.28 The Department of Education sets out guidelines for minimum classroom sizes and dimensions, ventilation and air quality requirements, lighting, fire safety, and designing effective school grounds.
- 6.29 The internal layout of the building has been designed in accordance with these guidelines, and the classrooms are increased in size from that which presently exist.
- 6.30 The school grounds will be effective as its design is informed by the creation of outdoor play spaces that contribute to children's fundamental need for exercise, social interaction, adventure, and sense of fun. Its layout has been discussed in detail previously in this report, and it is considered that the quality of this space is appropriate for the needs of the expanded school.
- 6.31 Ventilation, air quality requirements and lighting matters are discussed later in this report. Fire safety is not a planning matter.

- 6.32 The application sets out that an acoustic report was commissioned to assess the proposed building's acoustic performance, and that the report found that the proposed build was compliant and would achieve the current modern day acoustic requirements for learning environments.

Air Quality

- 6.33 London Plan Policy 5.3 (*Sustainable Design and Construction*) seeks to ensure developments improve environmental performance and adapt to the effects of climate change over their lifetime by minimising pollution and improving air quality through the minimisation of increased exposure to existing poor air quality areas.
- 6.34 Development Management Local Plan DM Policy 23 (*Air Quality*) requires consideration of potential impacts of pollution, including appropriate mitigation measures that would reduce exposure to acceptable levels.
- 6.35 The application site is located within an area identified as experiencing elevated pollutant concentrations. Specifically, the development is located within the London Borough of Lewisham's Air Quality Management Area 1, which has been declared due to exceedances of the annual mean Air Quality Objectives (AQO) for nitrogen dioxide (NO₂) and particulate matter with an aerodynamic diameter of less than 10µm (PM₁₀). As such, there is potential for future users to be exposed to high pollution levels at the site.
- 6.36 The Air Quality Assessment provided as part of the application included dispersion modelling in order to predict pollutant concentrations across the proposed development site as a result of emissions from the local highway network. Concentrations of NO₂ and PM₁₀ were predicted at various floor heights across the development, however elevated annual mean NO₂ concentrations were indicated at ground floor level only. There were no predicted exceedances of the annual mean AQO for PM₁₀ at any location across the development site.
- 6.37 The Air Quality Assessment considered that the proposed development includes a high specification of window tightness and as such, will ensure a supply of clean air for future users. It will also provide freedom of choice over whether natural ventilation is preferable during certain periods. This is considered suitable mitigation for a development of this size and nature to reduce exposure to both NO₂ and PM₁₀ pollutants. The assessment also notes that the key to reducing exposure using this method is to ensure site users are informed over the potential impacts associated with the prolonged exposure to elevated pollution levels. It is suggested that the school be provided with a welcome pack containing air quality information which will allow them to follow appropriate advice on protection against high concentrations during certain periods.
- 6.38 Based on the Air Quality Assessment results, air quality issues are not considered a constraint to the proposed development, subject to the inclusion of relevant mitigation measures as set out above. Mitigation measures can be imposed by way of condition, should the proposed scheme be approved. The proposed development is therefore aligned with London Plan Policy 5.3 and Development Management Local Plan DM Policy 23 in relation to air quality and sustainable design and construction.
- 6.39 No objections were raised by Council's Environmental Protection department with regard to air quality matters.

Ecology

- 6.40 DM Policy 24 (*Biodiversity, living roofs and artificial playing pitches*) sets out that the Council will require all new development to take full account of biodiversity and geodiversity in development design, ensuring the delivery of benefits and minimising of potential impacts on biodiversity and geodiversity.
- 6.41 The Preliminary Ecological Appraisal identifies the nature conservation values of the site, and assesses the ecological importance of the habitats in the areas relevant to the redevelopment of the school and the potential for these areas to support protected ecological features and species. The appraisal included a desk study and site walkover by a suitably experienced ecologist.
- 6.42 The desk study identified two statutory designated sites, and 36 non-statutory designation sites. A large number of records of bird species were found, such as fieldfare, house sparrow, peregrine falcon, and firecrest. Also found were four species of bat, hedgehogs, two species of reptile, invertebrate species, 15 invasive plant species, and two invasive faunal species. A range of habitat types such as amenity grassland and planted shrubs were also recorded.
- 6.43 The site walkover discovered disused bird nests (though no birds were encountered), butterfly-bush (an invasive species) growing from a cement-rendered shed, and cotoneaster planted within some areas of introduced shrubs. Mixed coniferous and broad-leaved scattered trees were identified, as well as three narrow strips of amenity grassland. Introduced shrubs were considered to make up the majority of the vegetation growing within the site, and small plant pots and ornamental hanging baskets were scattered around the school grounds. No definitive evidence of bats, badgers, hedgehogs, reptiles, amphibians, or invertebrate species were evidenced on site.
- 6.44 The preliminary ecological appraisal concluded that the application site is deemed to have suitable habitats to support species of breeding birds, but potential to support other protected species is negligible.
- 6.45 Recommended mitigation measures include undertaking vegetation clearance or building demolition outside of breeding bird season (between March and August). If such works cannot avoid the breeding bird season, it is recommended that a nesting bird check is conducted no site 24 hours prior to any works being undertaken. If an occupied nest is discovered, it must be left undisturbed until the chicks have fledged the nest and an ecologist has confirmed that the nest is no longer in use.
- 6.46 Based on the findings of the preliminary ecological appraisal, the proposed development is able to be carried out in a way that any impacts on biodiversity will be minimised, and will therefore be aligned with DM Policy 24. Mitigation measures can be imposed by way of condition, should the proposed scheme be approved.

Landscaping

- 6.47 The proposed development involves the retention of some trees on the property, but will largely seek to remove and replace existing trees. Specifically, in the vicinity of the proposed courtyard is a group of trees that will need to be removed to enable the construction of the building. Two further trees at the rear of the

proposed building will also be removed. All other trees at the rear of the property are proposed to be retained.

- 6.48 The Council's Tree Officer has reviewed the proposal and undertaken a site visit, and has advised that there are no trees on the property worthy of retention, and that the applicant should seek to replace these trees with appropriate species. More specifically, the Tree Officer considers that the trees that are proposed to be replanted in the courtyard area should be replanted as a large tree pit. The trees should have a maintenance schedule for 3-5 years, and the trees should be of container raised root-ball. Furthermore, the tree should be of container raised stock, with a well formed root ball with fibrous root system to enable access after building is complete. The trees must be planted in accordance with British Standard BS 8545:2014. These recommendations are accepted, and it is considered that appropriate conditions can be imposed to reflect these requirements.
- 6.49 A hard games court is proposed at the rear of the property, with artificial and planted grass areas on either side of the court. A soft rubber surface is also proposed for younger pupils near the building. A science garden to the north of the site can be accessed from either side of the hard games court and offers an area of quiet play for all years. The different zones will contain ground markings aimed at different age groups.
- 6.50 Existing play equipment will be reused and located to define separate areas within the new playground.
- 6.51 The boundary treatment along Scawen Road and Trundley's Road will largely stay the same with the existing metal fencing and brick boundary walls being retained where possible. A new 2m high anti-climb metal mesh fence will define the new proposed visitor entrance.
- 6.52 A bespoke 3m high timber fence is proposed to the courtyard area along Grinstead Road. This will provide privacy whilst also breaking up the façade of the development.
- 6.53 Overall, the proposed landscaping with replacement specimen planting will provide an appropriate school setting, and will enhance the built form of development.

Designing Out Crime

- 6.54 The NPPF clearly states in Paragraph 58 that local and neighbourhood policy should 'create safe and accessible environments where the fear of crime does not undermine the quality of life or community cohesion'.
- 6.55 London Plan Policy 7.3 (*Designing out crime*) seeks to create safe, secure and appropriately accessible environments where crime and disorder, and the fear of crime do not undermine quality of life or community cohesion by reducing the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating.
- 6.56 The Crime Prevention Report provided as part of the application sets out that the proposed development has been designed with Secure by Design standards in mind.

- 6.57 In terms of planning matters, the proposed scheme has been informed by security and crime prevention measures such as unopenable windows that face directly onto the street, internal drainpipes to prevent climbing onto the building, secure boundary treatment around the site, and clear and visible pathways through and around the playground areas.
- 6.58 The above design elements will ensure a safe, secure and appropriately accessible environment is created, whilst also contributing to a sense of security without being intimidating for future users.
- 6.59 The Designing Out Crime Officer for the Metropolitan Police Service provided comment in relation to the proposal, considering that the proposal should be able to achieve the security requirements of Secured by Design. It is felt that the adoption of Secured by Design New Schools 2014 standards will help to reduce the opportunity for crime, creating a safer, more secure and sustainable environment. It is requested that a 'Secured by Design' condition be attached to any planning permission granted, and that the benefits of certified products to meet physical security requirements be pointed out to the applicant.
- 6.60 In summary, it is considered that, in following the principles and physical security requirements of Secured by Design, the proposed development will be able to achieve a safe, secure and appropriately accessible environment. Such measures can be imposed by way of condition, should the proposed scheme be approved. An informative can be added to advise the applicant of the benefits of certified products. The proposed development therefore aligns with the NPPF and London Plan Policy 7.3.

Daylight Modelling

- 6.61 The Priority School Building Programme (PSBP) sets out that good quality daylight within the learning environment is essential. A baseline design for daylight strategy aims to ensure sufficient levels of balanced glare-free light to all teaching spaces.
- 6.62 The PSBP output specification requires the use of Climate-Based Daylight Modelling (CBDM) to calculate the incident illuminance across the working plane of each space, during core-hours, throughout a typical year. The PSBP output specification focuses on two key metrics; Daylight Autonomy and Useful Daylight Illuminance (UDI, a minimum daylight criteria as defined by the EFA) which must be provided in at least 80% of the teaching and learning spaces.
- 6.63 The CBDM undertaken for Sir Francis Drake Primary School assessed a range of daylight design solutions in order to find the most efficient, cost effective and practical solution that meets the EFA requirements, whilst providing flexible control over the visual environment. The modelling was undertaken using DAYSIM – a validated RADIANCE-based daylight analysis software package that models the annual amount of daylight in and around buildings.
- 6.64 In order to comply with DA and UDI criteria, rooms must achieve:
- a) DA: a minimum of 50% for more than 50% of the working plane, for the target illumination (typically 300 lux in teaching spaces), for the hours of operation from 8.30am to 4.00pm.

b) UDI: $UDI_{(100 \text{ Lux} \sim 3000 \text{ Lux})}$ for an average of 80% of the time over the working plane within a space (i.e. the level of Illuminance provided below 100 Lux and above 3000 Lux will occur for no more than 20% of the time).

6.65 The CBDM results show that the Daylight Autonomy and Useful Daylight Illuminance can be achieved or exceeded providing a compliant scheme. Analysis of the Area Data Sheets has highlighted 18 teaching and learning spaces which have a requirement for daylight.

6.66 The analysis of the results confirms that 16 teaching and learning spaces currently meet or exceed the minimum requirements. The hall and adjoining studio will not meet the minimum requirements as follows:

- Hall: DA of 21.8%, UDI of 53.9%
- Studio: DA of 0.0%, UDI of 57.5%

6.67 Given the results set out above, 88.9% of teaching and learning spaces comply with the EFA requirements.

6.68 Based on the findings of the CBDM report, overall the proposed blinds provide a flexible and cost effective design solution, which addresses both the performance needs of the space and visual comfort of the occupants.

6.69 In summary, with the proposed mitigation measures, the proposed development is able to ensure sufficient levels of balanced glare-free light to all teaching spaces is provided, thereby complying with the requirements of the Education Funding Agency's Priority School Building Programme.

Sustainability and Energy

6.70 London Plan Policy 5.2 (*Minimising Carbon Dioxide Emissions*) of the London Plan states that development should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:

- 1 Be Lean: use less energy
- 2 Be clean: supply energy efficiently
- 3 Be green: use renewable energy

6.71 Achieving more sustainable patterns of development and environmentally sustainable buildings is a key objective of national, regional and local planning policy. The London Plan suggests a 35% reduction in carbon emissions through the use of renewable energy technologies for major developments unless it can be demonstrated that such provisions is not feasible. Core Strategy Policy 8 requires all new non-residential buildings to achieve a BREEAM rating of 'Excellent'. All new development should address climate change and reduce carbon emissions.

6.72 Policy 5.3 (*Sustainable Design and Construction*) of the London Plan states that the highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime.

- 6.73 The Energy Statement provided as part of the application considered the feasibility of a wide range of Low and Zero Carbon (LZC) technologies for the new school building.
- 6.74 Energy efficient design measures have been adopted to enhance the fabric of the building by specifying building components with low U-values, avoiding thermal bridging and making the building airtight. Measures include limiting the heat loss through walls, floor, roof, windows, doors; day lighting; natural ventilation; shading in summer; thermal heating in winter; and reducing air permeability.
- 6.75 Energy saving products and techniques are also recommended to be incorporated into the base design to achieve reductions in CO₂ emissions. Measures include dimming controls linked to daylight sensors, local light switching, movement and absence sensors, low energy lighting, variable speed drives on air handling plant and pumps, heat recovery mechanical ventilation, low specific fan power, metering for energy management, and heating controls to optimise plant efficiency.
- 6.76 In terms of other energy efficiency measures, the report finds that:
- The school's anticipated heat demand is insufficient to make a connection to the South East London Combined Heat and Power (SELCHP) network economically viable. This has been confirmed by Veolia, the operator of the SELCHP scheme.
 - Liquid biomass Combined Heat and Power (CHP) did not prove to be financially feasible due to limited suppliers and relative expense when compared to other LZC technologies.
 - Gas fired CHP would need to be coupled with another technology to meet a 35% reduction in carbon emissions, and is therefore not an efficient solution.
 - Gas Absorption Heat Pumps (GAHP) would need to be coupled with another technology to meet a 35% reduction in carbon emissions, and the capacity of GAHP available in the market is limited requiring multiple units to be installed to deliver the required output.
 - Although the installation of PV panels is technically feasible, capital funding constraints prevents these from being installed at this stage. It is recommended that the roof is designed to allow the future installation of PV panels should funding become available.
- 6.77 The energy strategy adopts a primarily passive approach by investing in enhancing the thermal envelope of the building and applying energy efficient products and techniques. Through building design, the applicant is seeking to reduce the reliance on technology to meet sustainability principles. Such mitigation measures can be imposed by way of condition, should planning permission be granted.
- 6.78 The submitted Energy Statement states that the proposed development will aim to achieve a BREEAM rating of 'Very Good' through the adoption of the measures set out above.

6.79 The London Plan uses ADL2013 to define the carbon footprint of developments. The emission rates for the proposed build in comparison to the requirements of the ADL2013 standards are summarised in the table below.

Summary Table	Energy		CO ₂ Emissions		% Improvement
	kWh/yr	kWh/yr/m ²	kg/yr	kg/yr/m ²	
Target Emission Rate (ADL2013)	94,214	44.96	28,949	13.8	-
Proposed Building Emission Rate (ADL2013) + Energy Efficiency Measures	97,433	46.49	27,918	13.3	3.6%

6.80 Whilst the proposed development would not achieve a 35% reduction on Building Regulations 2013, it is considered that all reasonable efforts have been employed, given the financial constraints of the PBSP programme, and overall the proposed 'Very Good' BREEAM score is acceptable given the wider public benefits that the scheme would provide.

6.81 An objection received from a local community member raises that energy from the SELCHP should be diverted so that the school benefits from local heating and can benefit longer term from efficiency savings. The applicant's energy consultant made an application to the SELCHP District Heating network operator, Veolia, for connection to the district heating network. Veolia has confirmed that the predicted heat load for the development is insufficient to justify the extension of the SELCHP network to supply the proposed development, as it would not be economically viable at this time. The applicant's approach to energy efficiency is considered appropriate for the proposed scheme. It is noted that Veolia has indicated that there may be opportunity in the future for the SELCHP to be extended to key development sites.

6.82 Overall, the measures adopted in the design of the proposed development will result in a scheme that, whilst not directly aligned, is not contrary to the relevant planning policies relating to sustainable design and construction and energy efficiency.

Flood Risk

6.83 London Plan Policy 5.12 (*Flood risk management*) sets out that development proposals must comply with the flood risk assessment and management requirements set out in the NPPF and associated technical guidance on flood risk over the lifetime of the development.

6.84 Core Strategy Policy 10 (*Managing and reducing the risk of flooding*) sets out that applicants will need to demonstrate that their proposal will deliver a positive reduction in flood risk to the borough. This will need to be reflected through the inclusion of a positive statement within a detailed Flood Risk Assessment (FRA) for the site that clearly and concisely summarises how this reduction in flood risk will be delivered.

- 6.85 The application site is located within Flood Zones 2 and 3. The FRA submitted as part of the application sets out the potential sources of flooding, vulnerability and compatibility of the proposed development, an assessment of the flood impact, and mitigation measures.
- 6.86 The report concludes that the site and immediate surrounding area is afforded protection from local flood defences. The actual risk of fluvial flooding to the proposed development will therefore be residual in nature, being restricted to a breach of the defences, so can therefore be considered to be low.
- 6.87 Mitigation measures to ensure flood risk to the school and its users is kept to a minimum includes recommended finished floor levels, the incorporation of flood resilient construction techniques, and the development of an appropriate emergency plan.
- 6.88 The Environment Agency initially objected to the proposal on the grounds that the FRA initially submitted was inadequate, lacking information with respect to modelled flood levels for the site, proposed finished floor levels for the proposed development, and a comparison of the modelled floor level with finished ground floor level to indicate the potential depth of inundation at the site. The Environment Agency considered that the FRA failed to properly assess the risk posed to future occupants of the proposed school, therefore it could not be confirmed whether the proposed mitigation measures are sufficient to minimise the impact of flooding.
- 6.89 Since the objection from the Environment Agency was received, the applicant has submitted a revised Flood Risk Assessment to address the matters raised by the Environment Agency. This concludes that the proposed finished building ground floor level of 2.20m AOD will meet the 300mm above the breach scenario flood level in the current 200 year breach scenario, as stipulated in the London Borough of Lewisham's Strategic Flood Risk Assessment. The Environment Agency has since removed their objection, providing further comments and recommended planning conditions to mitigate effects relating to flood risk management, groundwater protection, and contaminated land. These have been set out previously in this report. The comments and recommendations are accepted, and are recommended to be imposed by way of planning conditions for any permission granted.
- 6.90 Overall, with the proposed mitigation measures, the effects of the proposed development on flood risk have been properly assessed. The proposal will therefore be aligned with London Plan Policy 5.12 and Core Strategy Policy 10 in relation to flood risk management.

Land Contamination

- 6.91 London Plan Policy 5.21 (*Contaminated Land*) seeks to ensure that the development of brownfield land does not result in significant harm to human health or the environment, and to bring contaminated land to beneficial use. In turn, DM Policy 28 (*Contaminated Land*) seeks to minimise any harmful effects to human health and the environment.

- 6.92 The submitted desk study and preliminary investigation report assesses the ground conditions at the site for use in the design and construction of the proposed development, as well as to assess the potential risk to human health and the environment.
- 6.93 The mechanisms used to assess site contamination included a desk study, ground investigation, a site walkover, a review of the geological, hydrogeological and hydrological settings, a search on environmental databases, a review of historical maps, and anecdotal evidence. The information gathered relates to both the application site and the immediate surrounds. These mechanisms are considered appropriate to enable an assessment of site contamination and risk to human health.
- 6.94 The desk based research and historical review identified the potential hazards on and off site in order to make a series of recommendations.
- 6.95 The report makes recommendations with regard to a deep ground investigation being required if piled foundations are proposed, the undertaking of further gas monitoring visits, and the development of a Remediation Method Statement to detail the proposed remediation strategy to be submitted and approved by the Local Planning Authority.
- 6.96 No response has been received from the Council's Environmental Protection department, however it is considered that conditions of any planning permission can address the recommendations set out in the submitted land contamination report.
- 6.97 The recommendations in the preliminary site investigation report are considered appropriate and adequate to mitigate any potential effects of contamination on the school site such that any risk to human health and the environment will be minimised. The proposed development is therefore aligned with London Plan Policy 5.21 and DM Policy 28 in relation to contaminated land.

Highways and Traffic Issues

- 6.98 The NPPF recognises that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. 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, safe and suitable access to the site can be achieved for all people. It should be demonstrated that improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. The NPPF clearly states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.
- 6.99 London Plan and Core Strategy Policies encourage sustainable transport modes whilst recognising the need for operational parking and disabled parking facilities. Car parking standards within the London Plan should be used as a basis for assessment. Priority should be given to enhancing pedestrian and cycle routes and promoting use of sustainable transport modes through a Travel Plan.

a) *Car Parking, Traffic Generation, Vehicle Movements and Safety*

- 6.100 The existing on-site parking provision is limited to one car parking space which is accessed from Trundley's Road. This will be maintained in the proposed scheme, with no changes to the location or means of access from Trundley's Road.
- 6.101 The Transport Statement submitted as part of the application reviews the current and proposed sustainable travel options available for staff and pupils and considers the potential transport effects of the increases in pupil and staff numbers.
- 6.102 The Transport Statement concludes that the forecast additional trips resulting from the enlarged Sir Francis Drake Primary School are not anticipated to be detrimental to the safety or operation of the local highway network, and that all additional parking requirements can be easily catered for on-street. The Transport Statement considers that Council infrastructure improvements for walking, cycling and scooting will mitigate the forecast increases, and as such the new school is unlikely to result in a significant increase on individual public transport services.
- 6.103 To support the Transport Statement, a Travel Plan has been submitted as part of the application which seeks to put in place the management tools that are necessary to enable teachers, administration staff, parents and school children to make informed decisions regarding their travel to the site and to encourage the use of sustainable modes. This will serve to minimise the adverse impacts of their travel to/from the school.
- 6.104 Concerns have been raised by members of the local community with regard to the availability of parking spaces in the vicinity of the subject site (particularly taking account of the development at the Neptune Wharf site), and existing traffic and parking congestion issues being worsened as a result of the proposed development. Comment was made that effective transport plans should be in place so that the route to and from the school is made safer and a diversion is put in place for foot traffic around the railway arches.
- 6.105 Concern has also been raised with regard to the timing of construction in relation to Neptune Wharf development in terms of the volume of construction traffic, and the impact on the local roads and safety of children.
- 6.106 Firstly turning to the availability of parking spaces, the Transport Statement included a parking survey in the residential streets surrounding the school during a typical school day to understand the quantum of existing on-street parking spaces and the utilisation of these spaces. The survey results demonstrate that there is a significant amount of spare parking capacity across the surveyed streets. Specifically, in total, the parking availability across all seven surveyed streets was never less than 133 spaces and during most periods there is significantly more spaces available.
- 6.107 As part of this study, a survey of existing staff and pupils was undertaken to understand the existing travel habits and calculate the modal split for both staff and pupils.

- 6.108 Based on the survey of existing staff and pupils, the calculations for parking demand for the enlarged school intake would result in approximately 53 vehicles associated with pupil drop-offs, and 21 additional staff potentially parking in nearby residential streets. Therefore, as a worst case, the peak additional parking demand would be 74 parking spaces.
- 6.109 As such, based on the results and calculations, the additional on-street parking demand resulting from the proposed development can be accommodated, and no significant effects are anticipated in terms of parking capacity in surrounding residential streets.
- 6.110 In terms of the generation of parking resulting from the Neptune Wharf development, this was assessed at the time that development was considered for planning permission. Specifically, a comprehensive and detailed car parking strategy was required to manage parking and access to the site, and in addition a car club formed part of the application. It was considered that the impacts of the development approved at the Neptune Wharf site with respect to parking were able to be appropriately mitigated.
- 6.111 With regard to traffic volumes, it is acknowledged that the enlarged school intake will result in an inevitable increase in traffic movements. As discussed above, the applicant's Transport Statement has found that the increase in vehicles to the area as a result of the proposed development is not anticipated to be detrimental to the safety or operation of the local highway network. Implementation of the applicant's Travel Plan will put in place the management tools that are necessary to enable teachers, administration staff, parents and school children to make informed decisions regarding their travel to the Site and to encourage the use of sustainable modes. This will serve to minimise the adverse impacts of their travel to/from the school. No concerns have been raised by the Council's Highways officer in regard to traffic volumes.
- 6.112 In terms of construction traffic volumes and the impact on the local roads and safety of children, the applicant's Transport Statement identifies that the developer will need to produce and supply a Construction Logistics Plan (CLP) for agreement with the local highway authority, prior to work commencing at the school. The Construction Method Statement submitted with the application sets out logistics with regard to the organisation of the site, such as site management, site hours, site establishment, fire procedures, notification of neighbours in relation to specific works, advance notice of road closures, pavement stopping-up, movement and hoisting of materials, delivery and storage, waste disposal, scaffolding and hoardings. It also sets out the scope of works and methodologies for demolition and construction, including risk and resource management, as well as dust, noise and vibration mitigation measures. It is considered that the Construction Method Statement fulfils the requirement for a Construction Logistics Plan in part.
- 6.113 The Construction Method Statement was submitted prior to on-site discussions between the applicant's team and Council's Highways department, and it is therefore considered that it should be updated to reflect and secure those discussions. Council's Highways Officer has commented that regard must be had to the interface of the Neptune Works site which will likely be undergoing construction at the same time as the proposed development works. Additionally,

safe routes for children travelling to and from the school must be maintained at all times. A condition is recommended to address any potential impacts on traffic safety resulting from construction logistics.

- 6.114 Overall, any effects associated with car parking, traffic generation, vehicle movements and safety can be appropriately mitigated by way of planning conditions as set out above.

b) *Access*

- 6.115 Access into the site for pupils, staff and pedestrians will be via two access points from Scawen Road. Delivery and service vehicles will access the site from an access point on Trundley's Road.
- 6.116 The site is located within an area of fairly low accessibility according to Transport for London's (TfL's) PTAL Ratings. The only bus route directly serving the site is the 225 with a bus stop located on Trundley's Road. Other bus services can be accessed on Evelyn Street. The closest train station is South Bermondsey.
- 6.117 Lewisham Council has a long-standing commitment to improving the pedestrian and cycle networks in the Borough. The North Lewisham Links Strategy 2007 (updated in 2012) identifies options for improving pedestrian and cycle routes in the Deptford and New Cross Area. The adjacent Grinstead Road scheme proposes pedestrian links through the site from Surrey Canal Road to Deptford Park. The redevelopment of the application site would not prejudice those pedestrian and cycling connections.
- 6.118 As discussed above, the applicant's Transport Statement demonstrates that there is a surplus of car parking spaces in the immediately surrounding area. The applicant proposes to provide 69 cycle parking spaces. This is considered to encourage sustainable transport modes.
- 6.119 Footpaths surround the subject site along Scawen, Grinstead and Trundley's Roads, thereby providing appropriate access for pedestrians into the school site. The Transport Statement finds that the pedestrian environment surrounding the school site is good, and that no significant improvements are required on the routes.
- 6.120 Overall, the school travel plan and the Council's planned improvement works will ensure pedestrian and cycle access to the site is improved, and any potential effects in terms of pedestrian and traffic safety in relation to both construction and operation of the school can be appropriately mitigated through implementation of the Travel Plan.

c) *Servicing and Deliveries*

- 6.121 The school is currently serviced via a gated access on Trundley's Road. Refuse vehicles and kitchen delivery vehicles stop on the single yellow lines on Trundley's Road.
- 6.122 Refuse collection at the new school will continue to be serviced from the existing gated access on Trundley's Road. However, as the new building location is on the southern part of the site, a dedicated kitchen access will be located on Trundley's Road. Therefore it is proposed that kitchen delivery vehicles will

service the school from the single yellow lines on the eastern side of Trundley's Road, between the bus stop and the double yellow lines.

- 6.123 The Transport Statement sets out that, although the proposed development will increase the number of pupils and staff at the school, this does not necessarily mean that there will be an increase in the number of servicing trips associated with it. It is also unlikely to result in the need for larger vehicles than are currently used. On this basis, the Transport Statement considers that it is not necessary to implement a Delivery Servicing Plan.
- 6.124 As discussed previously, the Council's Highways Officer has commented that a Delivery and Servicing Plan is required to formalise the proposed loading area, and to demonstrate that loading in the location proposed can be undertaken in a safe manner for both pedestrians and vehicular traffic. Additionally, a safety audit is required to assess the suitability of the loading / servicing / delivery facilities. In light of these comments, conditions are recommended to ensure any potential effects in terms of pedestrian and traffic safety are appropriately mitigated.

d) Cycle / Scooter Parking and Pedestrian Movement

- 6.125 The proposed development will provide a total of 69 cycle parking spaces.
- 6.126 The Transport Statement makes reference to 'Scoot to School' being seen as an important and emerging means of sustainable travel by school children who prefer not to cycle. As such scooter parking will be provided at the new school so that scooters do not occupy cycle parking.
- 6.127 The Transport Statement sets out that there will be an increase of 111 pupils and staff walking to school, 30 additional cyclists and 21 additional pupils scooting to school. It is considered that these increases are well catered for by the increased cycle and scooter parking on-site.
- 6.128 The modal split of trips across the wide network of routes leading to the school mean that the proportional increase in pedestrian movements on each route is unlikely to be significant when the staggered arrival and departure times of pupils and staff are taken into account.
- 6.129 The Transport Statement identifies a number of routes travelled by pedestrians and cyclists at present. The Transport Statement finds that the cycling and pedestrian environment is acceptable, and minor improvements will enhance this accessibility. Pedestrian and cyclist safety has been discussed above, and it is considered that the school Travel Plan will ensure any potential effects will be appropriately mitigated and dealt with.
- 6.130 As discussed previously, Council's Highways officer considers that the proposed development would benefit from improvement works in the surrounding road network, and has therefore recommended conditions be imposed in relation to management of parking controls and improved pedestrian facilities. This is accepted, and conditions recommended accordingly.

- 6.131 Council's Highways Officer considers that, given the Travel Plan identifies management tools for the proposed development, it would be appropriate for the Travel Plan submitted as part of the application to be reviewed within 6 months of the school role reaching full capacity (420 pupils). A condition is recommended in this respect.

Construction Management

- 6.132 The Construction Method Statement submitted as part of the application details the demolition and construction methodology for the proposed development. It is intended to stage the demolition and construction of buildings such that the school can continue operations throughout the development phases.
- 6.133 As set out above, the Construction Method Statement sets out logistics with regard to the construction and associated methodologies. It also sets out the scope of works and methodologies for demolition and construction, including risk and resource management, as well as dust, noise and vibration mitigation measures.
- 6.134 Implementation of the Construction Method Statement throughout the duration of works will ensure appropriate management of the potential environmental effects typically associated with demolition and construction.
- 6.135 Concerns have been raised by members of the local community with regard to the timing of construction in relation to the works at the Neptune Wharf site, the volume of construction traffic, and the impact on the local roads and safety of children. Concern was also raised in relation to the volume of workmen on the Neptune Wharf site increasing the demands of parking within the area.
- 6.136 The management of construction traffic has been discussed above. With regard to timing of construction in relation to the works at the Neptune Wharf site, no evidence has been provided as to how construction of the proposed scheme will align with the works proposed to be undertaken on the neighbouring Neptune Wharf site. It is considered that a condition can require a further and more detailed Construction Method Statement to be submitted to the Council for approval prior to construction commencing. This will sufficiently mitigate any potential effects that may arise with the works on each site coinciding.
- 6.137 The Council's Highways Officer has recommended conditions with regard to construction management.

Waste Management

- 6.138 London Plan Policy 5.18 (*Construction, excavation and demolition waste*) sets out that waste should be removed from construction sites, and materials brought to the site, by water or rail transport wherever that is practicable.
- 6.139 The Site Waste Management Strategy provided as part of the application sets out that a Site Waste Management Plan will be developed during the pre-commencement period. Initiatives will include a system of centralised rubbish skips to be removed from site on a regular basis, meeting BREEAM requirements, and implementation of waste reduction practices and procedures to maximise the segregation of construction waste.

- 6.140 The approach taken is considered acceptable, and any effects in terms of waste from both construction and operation of the school can be appropriately mitigated by way of conditions.

Residential Amenity / Impact on Neighbouring Properties

- 6.141 The increase in scale of the school has the potential to result in an increase in effects associated with the operation of the school, including noise from pupils entering and exiting the premises, construction, and general residential amenity.
- 6.142 Whilst the concentration of pupils on the site will double as a result of the proposal, this is not considered to generate a significant increase in noise levels.
- 6.143 Effects of the construction of the development have also been discussed previously in this report. In summary, it is considered that traffic associated with construction can be managed through the implementation of an updated Construction Method Statement. Additionally, effects in terms of noise, vibration, dust, and waste disposal can be avoided, remedied or mitigated through the management techniques set out in the Construction Method Statement.
- 6.144 Given the modest scale of the building in this context, and its proximity to surrounding properties (a minimum distance of 13m), it is not likely to overshadow surrounding properties.
- 6.145 Given the above, it is considered that the proposed development and associated construction will not have a significant impact on residential amenity.

7.0 Objections

- 7.1 The preceding assessment has largely addressed the concerns raised in the objections, and for the sake of brevity will not be repeated here. Additional matters raised are discussed below:

- 7.2 *Local authority should input some Section 106 contributions to provide better quality development and thus longevity.*

Since the application was submitted, confirmation has been received from the Pupil Places Programme Board that the Council will contribute to the proposed scheme to fund a canopy.

- 7.3 *Inadequate sports and recreational space and an unused / unusable roof space; proposal should provide an extra rooftop play space, and an additional sports hall.*

The proposed development is considered to meet the Department for Education's guidelines with respect to play spaces.

- 7.4 *Inadequate toilet facilities that will be impossible to safely maintain to appropriate hygiene standards; an increased ratio of toilets should be provided.*

This is not a planning consideration.

- 7.5 *Inadequate intervention space to support children with special education needs and disability; larger classroom sizes should be provided.*

The proposed development is considered to meet the Department for Education's guidelines with respect to classroom sizes and dimensions.

- 7.6 *Dispute that there are always large numbers of available parking spaces in the vicinity of the site, as stated in the Transport Statement.*

The applicant's Transport Statement has demonstrated that an adequate number of parking spaces are available in the vicinity of the school to cater for the increase in pupil intake. No evidence to the contrary is provided.

- 7.7 *Application does not take account of any future proofing; specifically, the development at Neptune Wharf will bring significant parking to the area, given the number of parking spaces allocated for the planned housing which does not include shopping traffic.*

This matter has been discussed previously in this report, and appropriate planning conditions recommended accordingly.

- 7.8 *Concern that existing traffic and parking congestion issues will be worsened when the volume increases.*

This matter has been discussed previously in this report, and appropriate planning conditions recommended accordingly.

- 7.9 *Comment that roads and pedestrian access routes around the school are hazardous, particularly the rail tunnel area linking the school to Surrey Canal Road – effective transport plans should be in place to that the route to and from the school, given increased traffic, is made safer and diverts foot traffic around the accident black spot under the rail arches.*

This matter has been discussed previously in this report, and appropriate planning conditions recommended accordingly.

- 7.10 *Concern raised with regard to timing of construction of Sir Francis Drake Primary School and the Neptune Wharf site, the volume of construction traffic, and the impact on the local roads and safety of children. The volume of workmen on the Neptune Wharf site will increase the demands on the parking within the area.*

This matter has been discussed previously in this report, and appropriate planning conditions recommended accordingly.

- 7.11 *Comment that energy from the South East London Combine Heat and Power network should be diverted so that the school benefits from local heating and can benefit longer term from efficiency savings.*

This matter has been discussed previously in this report, and appropriate planning conditions recommended accordingly.

8.0 Local Finance Considerations

- 8.1 Under Section 70(2) of the Town and Country Planning Act 1990 (as amended), a local finance consideration means:

- (a) a grant or other financial assistance that has been, or will or could be, provided to a relevant authority by a Minister of the Crown; or

(b) sums that a relevant authority has received, or will or could receive, in payment of Community Infrastructure Levy (CIL).

8.2 The weight to be attached to a local finance consideration remains a matter for the decision maker.

8.3 The Mayor of London's CIL is therefore a material consideration. CIL is payable on this application and the applicant has completed the relevant form.

9.0 Equalities Considerations

9.1 Section 149 of the Equality Act 2010 (“the Act”) imposes a duty that the Council must, in the exercise of its functions, have due regard to:-

(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;

(b) advance equality of opportunity between persons who share a relevant protected characteristic and those who do not;

(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

9.2 The protected characteristics under the Act are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

9.3 The duty is a “have regard duty” and the weight to attach to it is a matter for the decision maker bearing in mind the issues of relevance and proportionality.

9.4 Equality issues have been duly considered as part of the assessment of this application. It is not considered that the application would have any direct or indirect impact on the protected characteristics.

10.0 Conclusion

10.1 This application has been considered in the light of policies set out in the Local Development Management Plan and other material considerations.

10.2 The assessment above has demonstrated that, with the imposition of appropriate conditions to mitigate any potential effects, there will be no significant impacts in relation to design, quality of accommodation, air quality, ecology, crime prevention, access to daylight, sustainability and energy, flood risk, land contamination, highways and traffic, waste and construction management.

10.3 Officers consider that, with the recommended mitigation and planning conditions in place, the proposed development is of sufficient quality and would deliver a much needed school space. As such the development should be approved.

11.0 RECOMMENDATION

GRANT PERMISSION subject to the following conditions:-

Conditions

1. The development to which this permission relates must be begun not later than the expiration of three years beginning with the date on which the permission is granted.

Reason: As required by Section 91 of the Town and Country Planning Act 1990.

2. The development shall be carried out strictly in accordance with the application plans, drawings and documents hereby approved and as detailed below:

15132-100 Rev A (received 06 January 2016);

15132-101; 15132-102; 15132-103; 15132-110; 15132-111; 15132-112; 15132-120; 15132-121; 15132-130 (received 29 December 2016);

Design & Access Report (by LSI Architects LLP), dated December 2015

- Appendix A: Visualisations (by LSI Architects LLP)
- Appendix B: Planning Drawings
- Appendix C: Air Quality Assessment, dated 22nd December 2015 (by Resource and Environmental Consultants Limited)
- Appendix D: Preliminary Ecological Appraisal, dated January 2014 (by Mott MacDonald)
- Appendix E: Community Infrastructure Levy form
- Appendix F: Construction Method Statement, dated 16th December 2015 (by Kier Group)
- Appendix G: Crime Prevention Report (by LSI Architects LLP)
- Appendix H: Climate-Based Daylight Modelling report, dated 23rd November 2015 (by Kier Group)
- Appendix J: School Travel Plan, dated December 2015 (by Vectos)
- Appendix K: Energy Statement, Rev 02, dated 14/12/2015 (Van Zyl & de Villiers Limited Consulting Engineers)
- Appendix L: Flood Risk Assessment, Rev P4, dated February 2016 (by Fluid Structural Engineers and Technical Designers Limited)
- Appendix M: Phase 1 and 2 Desk Study and Preliminary Investigation Report for a Proposed School Redevelopment, Issue No. 1, dated 07 December 2015 (by Geosphere Environmental Limited)
- Appendix N: Planning Statement, dated December 2015 (by LSI Architects LLP)
- Appendix O: Statement of Community Engagement (by LSI Architects LLP)
- Appendix P: Transport Statement, dated December 2015 (by Vectos)
- Appendix Q: Site Waste Management Strategy (no author)

Reason: To ensure that the development is carried out in accordance with the approved documents, plans and drawings submitted with the application and is acceptable to the local planning authority.

3. No development shall commence on site until such time as an updated Construction Method Statement has been submitted to and approved in writing

by the local planning authority. The plan shall cover:-

- (a) Dust mitigation measures.
- (b) The location and operation of plant and wheel washing facilities.
- (c) Details of best practical measures to be employed to mitigate noise and vibration arising out of the construction process.
- (d) Details of construction traffic movements including cumulative impacts which shall demonstrate the following:-
 - (i) Rationalise travel and traffic routes to and from the site.
 - (ii) Provide full details of the number and time of construction vehicle trips to the site with the intention and aim of reducing the impact of construction related activity.
 - (iii) Measures to deal with safe pedestrian movement.
- (e) Security Management (to minimise risks to unauthorised personnel).
- (f) Details of the training of site operatives to follow the Construction Management Plan requirements and any Environmental Management Plan requirements.

Reason: In order that the local planning authority may be satisfied that the demolition and construction process is carried out in a manner which will minimise possible noise, disturbance and pollution to neighbouring properties, to ensure pedestrian and vehicular traffic safety, and to comply with Policy 5.3 Sustainable design and construction, Policy 6.3 Assessing effects of development on transport capacity and Policy 7.14 Improving air quality of the London Plan (2015).

- 4. (a) No development (including demolition of existing buildings and structures) shall commence until each of the following have been complied with:-
 - (i) A site investigation report to characterise and risk assess the site which shall include the gas, hydrological and contamination status, specifying rationale; and recommendations for treatment for contamination encountered (whether by remedial works or not), in accordance with the recommendations set out in the '*Phase 1 and 2 Desk Study and Preliminary Investigation Report for a Proposed School Redevelopment*', Issue No. 1, dated 07 December 2015 (by Geosphere Environmental Limited), has been submitted to and approved in writing by the Council.
 - (ii) The required remediation scheme implemented in full.
- (b) If during any works on the site, contamination is encountered which has not previously been identified ("the new contamination") the Council shall be notified immediately and the terms of paragraph (a), shall apply to the new contamination. No further works shall take place on that part of the site or adjacent areas affected, until the requirements of paragraph (a) have been complied with in relation to the new contamination.

- (c) The development shall not be occupied until a closure report has been submitted to and approved in writing by the Council.

This shall include verification of all measures, or treatments as required in (Section (a) i) and relevant correspondence (including other regulating authorities and stakeholders involved with the remediation works) to verify compliance requirements, necessary for the remediation of the site have been implemented in full.

The closure report shall include verification details of both the remediation and post-remediation sampling/works, carried out (including waste materials removed from the site); and before placement of any soil/materials is undertaken on site, all imported or reused soil material must conform to current soil quality requirements as agreed by the authority. Inherent to the above, is the provision of any required documentation, certification and monitoring, to facilitate condition requirements.

Reason: To ensure that the local planning authority may be satisfied that potential site contamination is identified and remedied in view of the historical use(s) of the site, which may have included industrial processes and to comply with DM Policy 28 Contaminated Land of the Development Management Local Plan (November 2014).

5. (a) The buildings hereby approved shall achieve a minimum BREEAM Rating of 'Excellent'.
- (b) No development shall commence until a Design Stage Certificate for each building (prepared by a Building Research Establishment qualified Assessor) has been submitted to and approved in writing by the local planning authority to demonstrate compliance with part (a).
- (c) Within 3 months of occupation of any of the buildings, evidence shall be submitted in the form of a Post Construction Certificate (prepared by a Building Research Establishment qualified Assessor) to demonstrate full compliance with part (a) for that specific building.

Reason: To comply with Policies 5.1 Climate change and mitigation, 5.2 Minimising carbon dioxide emissions, 5.3 Sustainable design and construction, 5.7 Renewable energy, 5.15 Water use and supplies in the London Plan (2015) and Core Strategy Policy 7 Climate change and adapting to the effects, Core Strategy Policy 8 Sustainable design and construction and energy efficiency (2011).

6. (a) No development shall commence on site until drawings showing hard landscaping of any part of the site not occupied by buildings (including details of the permeability of hard surfaces) have been submitted and approved in writing by the local planning authority.
- (b) All hard landscaping works which form part of the approved scheme under part (a) shall be completed prior to occupation of the development.

Reason: In order that the local planning authority may be satisfied as to the

details of the proposal and to comply with Policies 5.12 Flood risk management and 5.13 Sustainable Drainage in the London Plan (2015), Policy 15 High quality design for Lewisham of the Core Strategy (June 2011) and Development Management Local Plan (November 2014) Policy 25 Landscaping and trees, and DM Policy 30 Urban design and local character.

7. No development shall commence on site until a Tree Protection Plan (TPP) has been submitted to and approved by the Council. The TPP should follow the recommendations set out in BS 5837:2012 (Trees in relation to design, demolition and construction – Recommendations). The TPP should clearly indicate on a dimensioned plan superimposed on the building layout plan and in a written schedule details of the location and form of protective barriers to form a construction exclusion zone, the extent and type of ground protection measures, and any additional measures needed to protect vulnerable sections of trees and their root protection areas where construction activity cannot be fully or permanently excluded.

Reason: To safeguard the health and safety of trees during building operations and the visual amenities of the area generally and to comply with Policy 12 Open space and environmental assets of the Core Strategy (June 2011), and DM Policy 25 Landscaping and trees and DM Policy 30 Urban design and local character of the Development Management Local Plan (November 2014).

8. (a) A scheme of soft landscaping (including details of any trees or hedges to be retained and proposed plant numbers, species, location and size of trees and tree pits) and details of the management and maintenance of the landscaping for a period of five years shall be submitted to and approved in writing by the local planning authority prior to construction of the above ground works.
- (b) All planting, seeding or turfing shall be carried out in the first planting and seeding seasons following the completion of the development, in accordance with the approved scheme under part (a). Any trees or plants which within a period of five years from the completion of the development die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species.

Reason: In order that the local planning authority may be satisfied as to the details of the proposal and to comply with Core Strategy Policy 12 Open space and environmental assets, Policy 15 High quality design for Lewisham of the Core Strategy (June 2011), and DM Policy 25 Landscaping and trees and DM Policy 30 Urban design and local character of the Development Management Local Plan (November 2014).

9. (a) Details of all proposed boundary treatments including any gates, walls or fences shall be submitted to and approved in writing by the local planning authority prior to construction of the above ground works.
- (b) The approved boundary treatments shall be implemented prior to occupation of the buildings and retained in perpetuity.

Reason: To ensure that the boundary treatment is of adequate design in the interests of visual and residential amenity and to comply with Policy 15 High quality design for Lewisham of the Core Strategy (June 2011) and DM Policy 30 Urban design and local character of the Development Management Local Plan (November 2014).

10. (a) Prior to occupation of the development a scheme for any external lighting that is to be installed at the site, including measures to prevent light spillage shall be submitted to and approved in writing by the local planning authority.
- (b) Any such external lighting as approved under part (a) shall be installed in accordance with the approved drawings and such directional hoods shall be retained permanently.
- (c) The applicant should demonstrate that the proposed lighting is the minimum needed for security and working purposes and that the proposals minimise pollution from glare and spillage.

Reason: In order that the local planning authority may be satisfied that the lighting is installed and maintained in a manner which will minimise possible light pollution to the night sky and neighbouring properties and to comply with DM Policy 27 Lighting of the Development Management Local Plan (November 2014).

11. (a) The development shall not be occupied until a Delivery and Servicing Plan has been submitted to and approved in writing by the local planning authority.
- (b) The plan shall demonstrate:
 - (i) The expected number and time of delivery and servicing trips to the site, with the aim of reducing the impact of servicing activity.
 - (ii) That loading, delivery and servicing can be undertaken without posing any safety risks to pedestrians or traffic.
 - (iii) The exact location that delivery and servicing vehicles will stop to undertake loading, delivery and servicing without posing any safety risks to pedestrian or traffic.
- (c) The approved Delivery and Servicing Plan shall be implemented in full accordance with the approved details from the first occupation of the development and shall be adhered to in perpetuity.

Reason: In order to ensure satisfactory vehicle management and to comply with Policy 14 Sustainable movement and transport of the Core Strategy (June 2011).

12. (a) Prior to the creation of the loading bay on the eastern side of Trundley's Road, a Safety Audit shall be submitted to the local planning authority for approval to assess the suitability of the proposed loading / servicing / delivery facilities in close proximity to a bus stop and the Trundley's Road

/ Grinstead Road junction.

- (b) Works shall not commence on the proposed new loading bay until the recommendations made and agreed with the local planning authority in the approved Safety Audit document are implemented.
13. (a) The development shall operate in full accordance with all measures identified within the approved Travel Plan from first occupation.
- (b) Within 6 months of the school intake reaching full capacity (420 pupils), evidence shall be submitted to the local planning authority to demonstrate compliance with the monitoring and review mechanisms set out in the Travel Plan hereby approved.

Reason: In order that both the local planning authority may be satisfied as to the practicality, viability and sustainability of the Travel Plan for the site and to comply with Policy 14 Sustainable movement and transport of the Core Strategy (June 2011).

14. All planting, seeding or turfing comprised in the landscaping scheme hereby approved shall be carried out in the first planting and seeding seasons following the occupation of the buildings or the completion of the development, whichever is the sooner. Any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species.

Reason: In order that the local planning authority may be satisfied as to the details of the proposal and to comply with Policy 12 Open space and environmental assets, and Policy 15 High quality design for Lewisham of the Core Strategy (June 2011), and DM Policy 25 Landscaping and trees and DM Policy 30 Urban design and local character of the Development Management Local Plan (November 2014).

15. Loading and unloading of goods including fuel, shall only be carried out within the curtilage of the site and any servicing area shown upon drawing no. **15132-102** hereby approved, shall be retained permanently and left unobstructed at all times.

Reason: To avoid obstruction of neighbouring streets and to safeguard the amenities of adjacent premises in the interests of public safety and to comply with the Policy 14 Sustainable movement and transport of the Core Strategy (June 2011).

16. No deliveries in connection with construction works shall be taken at or despatched from the site other than between the hours of 8 am and 6 pm on Mondays to Fridays and 8 am and 1 pm on Saturdays and not at all on Sundays or Public Holidays.

No work shall take place on the site other than between the hours of 8 am and 6 pm on Mondays to Fridays and 8 am and 1 pm on Saturdays and not at all on Sundays or Public Holidays.

Reason: In order to safeguard the amenities of adjoining occupants at unsociable periods and to comply with Paragraph 120 of the National Planning Policy Framework and DM Policy 26 Noise and Vibration, and DM Policy 32 Housing design, layout and space standards of the Development Management Local Plan (November 2014).

17. No deliveries shall be taken at or despatched from the site other than between the hours of 7 am and 8 pm on Mondays to Fridays, 8 am and 1 pm on Saturdays, or at any time on Sundays or Public Holidays.

Reason: In order to safeguard the amenities of adjoining residents and to comply with Paragraph 120 of the National Planning Policy Framework, and DM Policy 26 Noise and Vibration, and DM Policy 32 Housing design, layout and space standards of the Development Management Local Plan (November 2014).

18. No machinery shall be operated on the premises before 8 am or after 6 pm on weekdays, or before 8 am or after 1 pm on Saturdays, nor at any time on Sundays or Public Holidays.

Reason: To safeguard the amenities of the adjoining premises and the area generally and to comply with Paragraph 120 of the National Planning Policy Framework, DM Policy 26 Noise and Vibration, and DM Policy 32 Housing design, layout and space standards of the Development Management Local Plan (November 2014).

19. None of the trees shown as being retained on the permitted plans shall be lopped or felled without the prior written consent of the local planning authority.

Reason: To comply with Policy 12 Open space and environmental assets of the Core Strategy (June 2011) and policies DM 25 Landscaping and trees and 30 Urban design and local character of the Development Management Local Plan (November 2014).

20. No development shall commence on site until a detailed schedule and samples (including erection of a sample panel of bricks on site) of all external materials and finishes, windows and external doors, and roof coverings to be used on the building have been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.

Reason: To ensure that the local planning authority may be satisfied as to the external appearance of the building(s) and to comply with Policy 15 High quality design for Lewisham of the Core Strategy (June 2011) and Development Management Local Plan (November 2014) DM Policy 30 Urban design and local character.

21. The finished ground floor level of the new school building shall be set at 2.20m AOD (Above Ordinance Datum, being the Statutory Flood Defence Level in this reach of the Thames).

Reason: In order that the local planning authority may be satisfied as to the details of the proposal and to comply with Policies 5.12 Flood risk

management and 5.13 Sustainable Drainage in the London Plan (2015).

22. Prior to development commencing on site, a flood evacuation plan for all site users showing access to the first floor as a safe haven shall be submitted to, and approved in writing by, the local planning authority.

Reason: In order that the local planning authority may be satisfied as to the details of the proposal and to comply with Policies 5.12 Flood risk management and 5.13 Sustainable Drainage in the London Plan (2015).

23. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

Reason: The site overlies secondary and principal aquifers. The National Planning Policy Framework(NPPF) paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. Government policy also states that planning policies and decisions should ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 121).

24. No infiltration of surface water drainage into the ground is permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

Reason: The site overlies secondary and principal aquifers and the National Planning Policy Framework (NPPF) paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.

25. Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: The site overlies secondary and principal aquifers and deep piling would require additional risk assessment in accordance with Environment Agency piling risk guidance.

26. (a) A minimum of 69 secure and dry cycle parking spaces shall be provided within the development as indicated on the plans hereby approved.

- (b) No development shall commence on site until the full details of the cycle parking facilities have been submitted to and approved in writing by the local planning authority.
- (c) All cycle parking spaces shall be provided and made available for use prior to occupation of the development and maintained thereafter.

Reason: In order to ensure adequate provision for cycle parking and to comply with Policy 14: Sustainable movement and transport of the Core Strategy (2011).

27. Within one (1) month of the date of this permission, the applicant shall secure the implementation of the following works to the highway, in accordance with a scheme and programme to be submitted to the local planning authority and agreed with the Highways Authority:
- Improve the management of parking controls on Scawen Road through the provision of yellow lines, school zig zags and guard railing.
 - Works to provide improved pedestrian crossing facilities on Scawen Road linking the school to Deptford Park and to the south-east of the site on Grinstead Road.

The approved works will be implemented and completed in full accordance with the agreed scheme.

Reason: In order to ensure that satisfactory means of access is provided, to ensure that the development does not prejudice the free flow of traffic or conditions of general safety along the neighbouring highway and to comply with the Policy 14 Sustainable movement and transport of the Core Strategy (June 2011).

28. Due to the potential of encountering breeding birds on site any vegetation clearance or building demolition on site should be conducted outside of the breeding bird season (between March and August). If such works cannot avoid the breeding bird season, a nesting bird check shall be conducted on site 24 hours prior to any works being undertaken.

If an occupied nest is discovered, it must be left undisturbed until the chicks have fledged the nest and an ecologist has confirmed that the nest is no longer in use.

Reason: To comply with Policy 7.19 Biodiversity and access to nature conservation in the London Plan (2015), Policy 12 Open space and environmental assets of the Core Strategy (June 2011), and DM Policy 24 Biodiversity, living roofs and artificial playing pitches and local character of the Development Management Local Plan (November 2014).

Informatives

- A. **Positive and Proactive Statement:** The Council engages with all applicants in a positive and proactive way through specific pre-application enquiries and the detailed advice available on the Council's website. On this particular application, positive and proactive discussions took place with the applicant prior to the application being submitted through a pre-application discussion. On this particular application, positive discussions took place which resulted in further information being submitted.
- B. The applicant is advised that the display of any signage exceeding 0.3 square metres (or any size if illuminated) will be subject to obtaining advertisement consent from the local planning authority prior to erecting any signage.
- C. The applicant is advised that any works associated with the implementation of this permission (including the demolition of any existing buildings or structures) will constitute commencement of development. Further, all pre commencement conditions attached to this permission must be discharged, by way of a written approval in the form of an application to the Planning Authority, before any such works of demolition take place.
- D. The updated Construction Method Statement required by Condition (3) shall take into account the Neptune Works site and other development sites which utilise Evelyn Street, and shall ensure that safe routes for pupils travelling to and from the school is maintained at all times.
- E. The applicant is advised to give consideration to the use of flood resistant and resilient measures – such as barriers on doors, windows and access points at the ground floor level and routing electrical services from a higher level downwards so that plug sockets are located above possible flood levels – within the proposed development, in order to reduce the impact of flooding. The applicant should consult with the Council's building control department when determining whether particular flood resistant and resilient measures are appropriate and effective.
- F. It is recommended that the applicant registers with the Environment Agency's 'FloodLine' service.
- G. The applicant should consult with the Council's drainage team for advice on managing the surface water drainage for this proposal.
- H. The applicant is advised that handling, transport, treatment and disposal of contaminated soil or materials are subject to waste management legislation which includes:
- Duty of Care Regulations 1991
 - Hazardous Waste (England and Wales) Regulations 2005
 - Environmental Permitting (England and Wales) Regulations 2010
 - The Waste (England and Wales) Regulations 2011

- I. The applicant is advised that they should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.
- J. If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12 month period the developer will need to register with us as a hazardous waste producer.
- K. The applicant is advised that the development should be undertaken in accordance with the physical security requirements of Secured by Design with the guidance of Secured by Design New Schools 2014 and close liaison with the South East Designing Out Crime Officer.
- L. The applicant is advised that the building's roof design should allow for the future installation of photovoltaic panels.
- M. The applicant is advised that Conditions 3 (Construction Method Statement), 4 (Site Investigation), 5 (Design Stage Certificate), 6 (Landscaping), 7 (Tree Protection Plan), 8 (Soft Landscaping), 9 (Boundary Treatment), 10 (Lighting), 12 (Safety Audit), 20 (Materials), 22 (Flood Evacuation Plan), 26 (Cycle Parking), and 27 (Highway Works) require details to be submitted prior to the commencement of works due to the importance of: minimising disruption on local residents and the local highway network during demolition and construction works; correctly identifying and remediating site contamination; mitigating any potential flood risk; and securing cycle parking, quality design and landscaping.
- N. With regards to Condition 22, this document will need to be approved in consultation with the Council's Emergency Planning Department.