1 APPLICATION DETAILS

Ref:	23/03175/FUL
Location:	Royal Russell School, Coombe Lane, Croydon, CR9 5BX
Ward:	South Croydon
Description:	Demolition of existing Junior School. Erection of replacement Junior School including Multi-Use Games Area, sports pitch, play and landscaped areas, access and plant, and other associated works.
Drawing Nos:	For full list of drawings and submitted documents see Appendix B.
Applicant:	Russell School Trust
Agent:	Alexandra Martin, LUC
Case Officer:	Samantha Dixon

1.1 This application is being reported to committee because:

- Objections above the threshold in the Committee Consideration Criteria have been received.

2 RECOMMENDATION

2.1 That the Committee resolve to GRANT planning permission

2.2 That the Director of Planning Sustainable Regeneration is delegated authority to issue the planning permission subject to:

A. Any direction by the London Mayor pursuant to the Mayor of London Order

B. The prior completion of a legal agreement to secure the following planning obligations:

a) Employment and Training contribution
b) Zero carbon offset of £21,710 and standard 'be seen' clauses
c) Travel Plan and monitoring
d) Retention of scheme architects
e) Relevant monitoring fees (4 x £1,500)
f) Any other planning obligation(s) considered necessary by the Director of Planning and Sustainable Regeneration

2.3 That the Director of Planning and Sustainable Regeneration is delegated authority to negotiate the legal agreement indicated above.

2.4 That the Director of Planning and Sustainable Regeneration is delegated authority to issue the planning permission and impose conditions [and informatives] to secure the following matters:

Conditions

1) Commencement time limit of 3 years

2) Carried out in accordance with the approved drawings
3) Demolition of all existing junior school buildings
4) Limit the number of junior school pupils to 400

Pre-commencement

5) Submission of updated Construction Logistics Plan
6) Submission of Construction Environmental Management Plan for biodiversity
7) Submission of Biodiversity Gain Plan
8) 2 stage archaeology condition – Written scheme of investigation to be submitted
9) Contaminated land
10) Accordance with the Flood Risk Assessment and Drainage Strategy and further sustainable drainage details to be submitted

Prior to above ground floor slab level

11) Full details of materials to be submitted
12) Overheating mitigation details to be submitted
13) Hard and soft landscaping details (including boundary treatments) to be submitted
14) Submission of biodiversity enhancement strategy
15) Full details of photovoltaic panels to be submitted

Pre-occupation

16) Details of public art strategy to be submitted
17) Submission of wildlife sensitive lighting design scheme
18) Submission of community use agreement in consultation with Sport England
19) Multi Use Games Area and new grass football pitch to be provided
20) Details of cycle and scooter parking to be submitted
21) Secured by design measures to be approved and achieved
22) Whole Life-Cycle carbon assessment to be submitted
23) Circular economy - Post-construction monitoring report to be submitted

Compliance

24) Accordance with Tree Protection measures
25) Accordance with ecological appraisal recommendations
26) Accordance with Operational Waste Management Plan
27) Accordance with Delivery & Servicing Plan
28) Accordance with Energy and Sustainability Statement
29) Accordance with recommendations of the Air Quality Assessment
30) Air handling units/Plant/Machinery requirements
31) Requirement for ultra-low NOx boiler
32) Accordance with Planning Fire Statement
33) Any other planning condition(s) considered necessary by the Director of Planning and Sustainable Regeneration

Informatives

1) Subject to S106 agreement
2) Construction Logistics Plan informative related to Condition 5
3) Archaeological informative related to Condition 8
3) Sport England informative related to Condition 17
4) Construction Code of Practice
5) Any other informative(s) considered necessary by the Director of Planning and Sustainable Regeneration

2.5 That the Committee confirms that it has had special regard to the desirability of preserving the settings of listed buildings and features of special architectural or historic interest as required by Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

2.6 That the Committee confirms that adequate provision has been made, by the imposition of conditions, for the preservation or planting of trees as required by Section 197 of the Town and Country Planning Act 1990.

2.7 That, if by 23rd February 2024 the legal agreement has not been completed, the Director of Planning and Sustainable Regeneration is delegated authority to refuse planning permission.

3 PROPOSAL AND LOCATION DETAILS

Proposal

3.1 The proposal is for the following:

- Partial demolition of some existing buildings on site to enable the construction of the new junior school and to accord as far as possible with Condition 8 of planning permission ref. 15/01323/P.
- Erection of new junior school building comprising two to three storeys (GEA 3,973sqm)
- Increase in number of classrooms from 19 to 20 (enabling a capacity of pupils from 380 – 400)
- Installation of MUGA and outside play areas
- Formalise use of paddock as a playing field
- Provision of new vehicular access to 'Junior School Headmasters House' (from within the site)
- No other alteration proposed to existing access or parking arrangement
- Provision of refuse storage area, scooter and cycle parking bays
- Installation of extensive soft landscaping and tree planting
- Full demolition of existing junior school building on site once the new building is ready for occupation.

Figure1: Proposed site plan

Amendments/Additional Information

3.2 During the course of the application additional information has been provided with regard to transport issues, in particular to address the comments that have been raised with regard to the access from Hollingsworth Road. Neighbours and ward councillors were reconsulted on the addition information.

3.3 Amended plans and additional information has also been received to address Stage 1 GLA comments. This information is with regard to; The Energy Strategy, Air Quality, flood risk assessment, urban greening calculation and transport issues. The issues raised are discussed in the report below. The plans have been amended to include the provision of 10 cycle bays within the junior school site.

3.4 The proposed waste management plan has also been updated and as a result the location of the bin store has been altered. Amended plans have been received to update the location of the bin store (on all relevant plans).

Site and Surroundings

3.5 The Royal Russell School site is spread over an area of 45 hectares and contains a large independent school (providing both secondary and primary education) comprising a series of individual buildings of one to three storeys in height, alongside large areas of parking, playing pitches and courts, staff accommodation and large areas of woodland. The school was established on the site in the 1920s. The school accommodates girls and boys from age 3 to 18 with both day and boarding pupils. The school provides education for approximately 1,150 pupils, and has 350 members of staff.

3.6 The development site itself is formed of the existing Junior School, the associated external play areas and the grass paddock area to the east, as outlined in red in Figure 2 (site location plan) below. The blue line shows the school's ownership boundary. The Junior School sits to the north of the main school campus and is the most visible part of the school from the entrance gates. The Junior school building was erected in the 1960s constructed of Laingspan, which is a prefabricated concrete construction held in place by tensioned steel cables. As well as the Junior School facilities, the buildings also comprise the nursery, medical wing and boarding accommodation. The boarding accommodation has been relocated into new build accommodation to the south and this element of the building is currently unoccupied. The buildings range in height from one to three storeys. There are outside play areas mainly to the rear and the complex is surrounded by woodland. The Junior School currently has capacity for 380 pupils aged 3-11 (nursery to Year 6), in 19 classrooms.

3.7 Access to the school campus is mainly from the Coombe Lane (A212) entrance point. There is also a pedestrian access from Hollingsworth Road to the south which is a residential cul-de-sac. A historic access from Coombe Lane is located to the western side of the junior school site, however is no longer in use. The existing car parking areas are located to the front/south and west/side of the junior school site and these areas serve the whole campus.

3.8 The surrounding area is predominantly residential. The tramline runs past the site to the opposite side of Coombe Lane to the north east. The north eastern part of the site slopes gently downwards towards Coombe Lane. However, due to the topography and presence of mature trees, views into the site are limited.

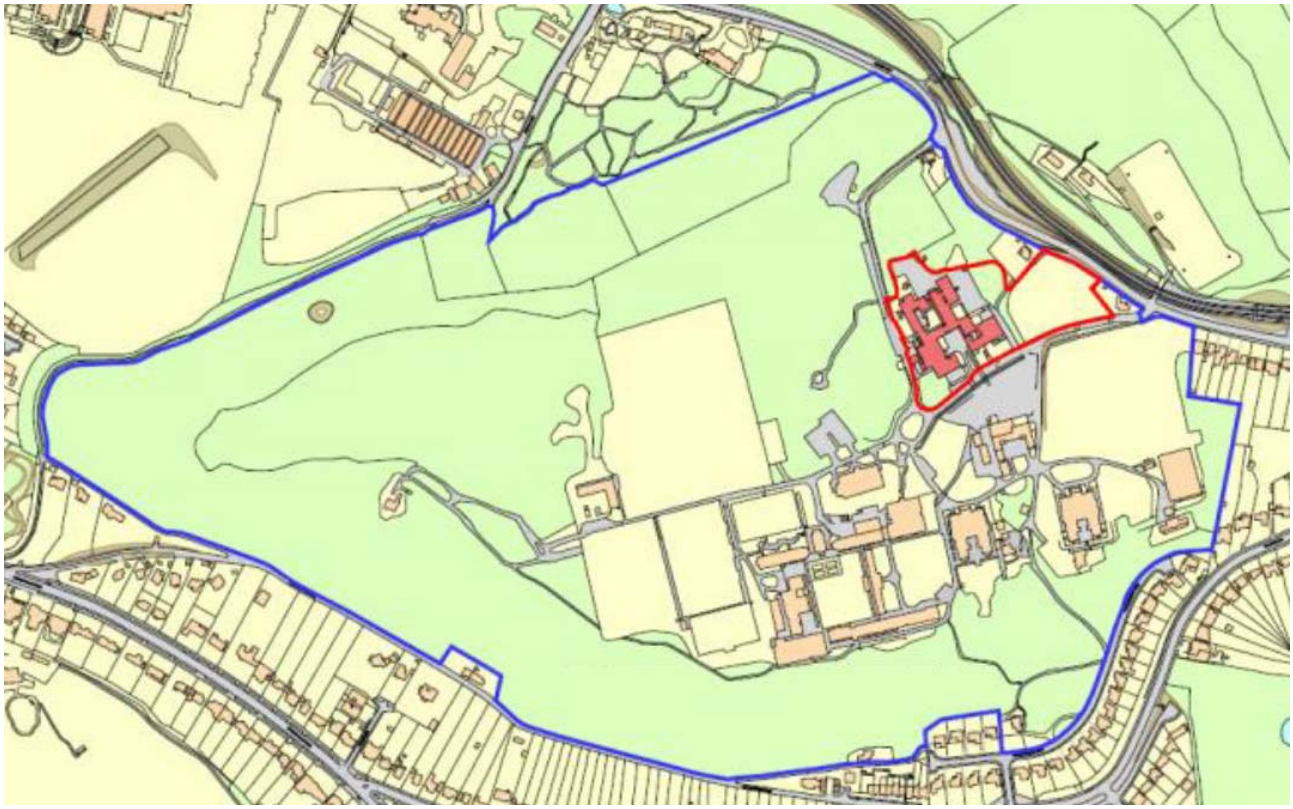

Figure 2: Site location plan

Figure 3: Aerial view of the Royal Russell School campus

Figure 4: Aerial view of the Junior School

Figure 5: Existing Junior School building when viewed from vehicular access into the site

Planning Designations and Constraints

3.9 The site is subject to the following formal planning constraints and designations:

- The site is located within the designated Metropolitan Green Belt
- Much of the site is within a Site of Nature Conservation Importance (the junior school site itself is not within this designation however the land surrounding the site is)
- The site is wholly within the Addington Hills Archaeological Priority Zone
- The entire school site is a locally listed Historic Park and Garden
- The Main Lodge of the school (to the north of the junior school site) and the part of the main school building (within the main school complex to the south west of the junior school site) are on the Council's Local List of buildings of Architectural or Historic Value.
- Old Ballards Cottage to the far south of the school campus is a Grade II statutorily listed building.
- A small part of the site to the north-west adjoining Coombe Wood lies on the edge of a designated Croydon Panorama (viewed from Addington Hills).
- Some trees within the site are protected by Tree Preservation Orders (TPO). There are two TPO's that affect the site TPO No.27, 1970 and No.27, 2014. Neither of these are located in close proximity to the junior school site.
- The site (at its entrance point on Coombe Lane) has a Public Transport Accessibility Level (PTAL) of 2, Coombe Lane tram stop is approximately 160m from the school entrance (3 minute walk). This tram line runs to New Addington and Wimbledon (via Croydon).
- The site is largely at low risk of surface water flooding, however there are areas around the junior school (including the area where the new building is proposed) that are at 1 in 1000 year risk. The site has limited potential for ground water flooding to occur.

Planning History

3.10 There is extensive planning history at the site. The following most recent planning decisions are:

07/03765/P Erection of two/three storey link extension to provide performing arts centre; enhanced kitchen and dining facilities and ancillary office accommodation.
Approved [and implemented]

11/03345/P Erection of single storey detached building for use by gymnastics club.
Refused on grounds of impact on greenbelt and unsatisfactory design and layout.

13/01357/P Two all-weather pitches; multi use games area; floodlights; new grass playing pitches; improvements of internal access road.
Approved [and implemented]

14/03633/DT Proposed boarding houses and pavilion, to be the first applications within merging master plan proposals for boarding houses, academic and sports facilities, car parking and landscaping.
Environmental Impact Assessment Not Required

15/01323/P Construction of two three-storey buildings to provide replacement residential student accommodation and associated landscaping and ecological enhancement works, and demolition of the existing Cambridge House residential student accommodation.
Approved 30.07.2015 [and implemented]

Within the assessment of this application it was concluded that the development was inappropriate in the Green Belt however very special circumstances existed to outweigh the harm. To mitigate the harm the applicant committed to demolition of other buildings within the site to offset the development, the Officer report commented as follows:

'Following the completion and occupation of Building 1, the existing Cambridge House boarding accommodation would be demolished, releasing 633m2 of Green Belt land. Following the completion and occupation of Building 2, the existing Queens House boarding accommodation would be demolished, releasing a further 950m2 of land. This is a significant mitigating factor to be weighed against the harm to the Green Belt in this case. The applicant has confirmed that they would be prepared to commit to the demolition of the existing buildings in this sequence and the detailed wording of a planning condition (Planning Condition 8) is recommended to reflect this approach'.

Subsequently, Condition 8 of 15/01323/P reads as follows:

'The demolition of Cambridge House, shown on plan ref. 2715 A004 8 shall be commenced no later than 6 months after the first occupation of Building I shown on plan ref. 2715 A499. The demolition of Queens

House, hatched in red on plan ref. 2715 A499, shall be commenced no later than 6 months after the first occupation of Building II shown on plan ref. 2715 A499. The demolition works shall be completed no later than 6 months following their commencement.
Reason: To preserve the openness and visual amenity of the Green Belt in accordance with Policies RO1 of the Croydon Replacement Unitary Development Plan (The Croydon Plan 2006) Saved Policies 2013, Policy 7.16 of the London Plan (Consolidated with alterations since 2011) and Chapter 9 of the National Planning Policy Framework (NPPF)'.

16/04999/CONR Construction of two three-storey buildings to provide replacement residential student accommodation and associated landscaping and ecological enhancement works, and demolition of the existing Cambridge House residential student accommodation (without compliance with condition 7 -sustainability- and 17- built in accordance with plans- attached to planning permission 15/1323/P).
Approved 07.02.2017 [and implemented]

17/00682/CONR Construction of two three-storey buildings to provide replacement residential student accommodation and associated landscaping and ecological enhancement works, and demolition of the existing Cambridge House residential student accommodation (without compliance with condition 8 - time period for demolition of Cambridge House- attached to planning permission 15/01323/P).
Approved 14.07.2017

Wording of Condition 8 amended to read as follows:

'The demolition of Cambridge House, shown on plan ref. 2715 A004 8 shall be commenced no later than <u>1 year</u> after the first occupation of Building I shown on plan ref. 2715 A499. The demolition of Queens House, hatched in red on plan ref. 2715 A499, shall be commenced no later than 6 months after the first occupation of Building II shown on plan ref. 2715 A499. The demolition works shall be completed no later than 6 months following their commencement.
Reason: To preserve the openness and visual amenity of the Green Belt in accordance with Policies RO1 of the Croydon Replacement Unitary Development Plan (The Croydon Plan 2006) Saved Policies 2013, Policy 7.16 of the London Plan (Consolidated with alterations since 2011) and Chapter 9 of the National Planning Policy Framework (NPPF)'.

18/02909/FUL Science block extension
Approved 11.09.2018 [and implemented]

20/02463/CONR Variation of condition 8 (time for demolition in respect of Queens House extended to 12 months) subject to previous planning consent ref. 19/02112/CONR.
Approved 30.10.2020

In considering the application, the Officer report commented as follows:

'It is not considered appropriate or necessary to extend the time allowed for demolition by 2.5 years. The main consideration is the impact of the variation to the condition on the openness and visual amenity of the Metropolitan Green Belt. The impact of the change would mean Queens House would be retained on the site for an additional 2.5 years (maximum) than was originally required by the condition. One of the main justifications for allowing the original redevelopment of the school in the Green Belt was the ability to control the phasing of development to ensure that works continue and Green Belt land is released as planned to minimise the long term impact on openness. It is considered that three years is an excessive length of time to extend the demolition requirement by, and would effectively mean works would cease for a significant length of time with the existing situation (and harm to the Green Belt) becoming established on site. The varied wording of the condition originally proposed by the applicant therefore cannot be supported.

On balance it is considered an extension of time of a further 6 months (total of 1 year) to the demolition of Queens House can be accepted, to allow the applicant some flexibility given the arguments they have raised but ensuring the phased works continue to minimise the impact on the Green Belt. It is not considered appropriate or necessary to extend the other timescales secured by the condition, for example it is not considered unreasonable for demolition to be completed within 6 months of its commencement to allow development to move forward.

Subsequently the wording of Condition 8 was amended as follows:

'The demolition of Cambridge House, shown on plan ref. 2715 A004 8 shall be commenced no later than 1 year after the first occupation of Building I shown on plan ref. 2715 A499. The demolition of Queens House, hatched in red on plan ref. 2715 A499, shall be commenced no later than 1 year after the first occupation of Building II shown on plan ref. 2715 A499. The demolition works shall be completed no later than 6 months following their commencement.
Reason: To preserve the openness and visual amenity of the Green Belt'

22/02544/CONR Variation of Condition 8 (time for demolition in respect of Queens House) attached to planning permission ref. 15/01323/P (as amended by 19/02112/CONR and 20/02463/CONR) (Construction of two three-storey buildings to provide replacement residential student accommodation and associated landscaping and ecological enhancement works, and demolition of the existing Cambridge House residential student accommodation)
Approved 30.03.2023

By reason of the ongoing extensive pre-application discussions with regard to the replacement of the junior school building, the wording Condition 8 was amended as follows:

'The demolition of Cambridge House, shown on plan ref. 2715 A004 8 shall be commenced no later than 1 year after the first occupation of Building I shown on plan ref. 2715 A499. The demolition of Queens House, hatched

in red on plan ref. 2715 A499, shall be commenced no later than 2 years 6 months after the first occupation of Building II shown on plan ref. 2715 A499. The demolition works shall be completed no later than 2 years following their commencement.
Reason: To preserve the openness and visual amenity of the Green Belt'.

22/01580/PRE Demolition of the existing Junior School and replacement on the same site with a new Junior School, associated outdoor areas and landscaping.
This pre-application enquiry was presented to Planning Committee on 18th May 2023. See summary of members comments in Section 5 below.

4 SUMMARY OF KEY REASONS FOR RECOMMENDATION

4.1 The application is recommended for approval for the following reasons:

- Very special circumstances have been demonstrated to enable officers to conclude that the development would not have any adverse impact on the openness of the Metropolitan Green Belt.
- The proposed development would be acceptable in terms of its layout and design.
- There would be no adverse impact on existing sports facilities.
- The loss of 3 trees on site would be well mitigated by the extensive tree and landscape planting that is proposed.
- The scheme would achieve biodiversity new gain which well exceeds the policy requirement.
- The proposal has been designed to meet the functional needs of the school, providing high quality inside and outside learning facilities.
- There would be no adverse impact on any neighbouring residential property in terms of loss of light, privacy, outlook or noise disturbance.
- Existing access and parking provision will not be affected by the proposed works. There will not be any significant additional impact on the surrounding highway network.
- The existing access/highways issue that has been raised relating to Hollingsworth Road is an existing situation which will not be significantly additionally impacted by the proposal. The school has outlined measures to address this issue as far as is reasonable.
- Sustainable travel improvements will be facilitated through the School Travel Plan.
- The development will meet energy performance targets.
- The proposal will cause no air or noise quality concerns.
- Sustainable drainage systems are proposed that meet with Lead Local Flood Authority requirements.

4.2 The following sections of this report summarise the officer assessment and the reason for the recommendation.

5 CONSULTATION RESPONSE

5.1 The views of the Planning Service are expressed in the MATERIAL PLANNING CONSIDERATIONS section below.

5.2 The following were consulted regarding the application:

Greater London Authority (GLA) (Statutory Consultee)

5.3 GLA Stage 1 comments as follows:

- Land use principles: The redevelopment of this previously developed site does not cause greater harm to the openness of the Green Belt and thus meets exception to inappropriate development. The reprovision of improved facilities for education is supported in principle.
- Urban design: The design of the proposed development raises no strategic concern.
- Transport: General parking should be decreased and blue badge parking provision should be increased in line with London Plan Policy T6. Long-stay and short/stay cycle provision should be increased. (Officer Comment: The applicant has submitted additional information in response the concern raised. This is discussed further in paragraph(s) 8.134 and 8.147 of this report).
- Other issues on Energy, Whole Life carbon and Circular Economy also require resolution prior to the Mayor's decision making stage. (Officer Comment: The applicant has submitted additional information in relation to the matters raised. This is discussed further in paragraphs 8.159, 8.161, 8.164-8.173 and 8.187 of this report).
- The application does not yet comply with the London Plan. Possible remedies as the GLA has set out could address these deficiencies.

Lead Local Flood Authority (LLFA) (Statutory Consultee)

5.4 There was an initial request for further information from the LLFA. Updated information has been provided and the LLFA have confirmed that they have no objection as the application now meets most of the LLFA requirements. Some clarifications and additional information are still required to demonstrate that the proposals are fully complaint. However, these can be addressed by the inclusion of a pre-commencement condition to provide such details.

Sport England (Statutory Consultee)

5.5 No objection as the development is considered to broadly meet exception 5 of Sport England Planning Fields Policy and to accord with Paragraph 99 of the NPPF, subject to conditions securing the delivery of the proposed outdoor sports areas and a community use agreement relating to the MUGA.

The Gardens Trust (Statutory Consultee)

5.6 London Historic Parks and Gardens Trust has considered the information and on the basis of this there are no comments on these proposals.

Historic England Greater London Archaeological Advisory Service

5.7 The 1.7ha application site is located within a Tier II Archaeological Priority Area. There is a discernible archaeological potential. The development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that a two-stage archaeological condition could provide an acceptable safeguard.

Thames Water

5.8 If the developer follows the sequential approach to the disposal of surface water, Thames Water would have no objection. Thames water would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. No objection with regard to waste water network and sewage treatment works infrastructure capacity. (Officer comment: The site is not in an area at high risk of flooding. The developer has followed the drainage hierarchy).

Ecological Consultant

5.9 No objection subject to the imposition of conditions

Metropolitan Police Service

5.10 Request the standard Secured-by-Design condition to be imposed. The condition will make sure that the school is developed into a safe and secure environment for the children and staff.

Building Control

5.11 No objection raised. The competency of the authors would appear to meet that expected by the guidance. (Officer note: The London plan requires independent fire strategies to be produced by a third party, suitably qualified assessor. Guidance is contained in London Plan Guidance on Fire Safety, dated February 2022). The statements anticipated in respect to the proposal meeting the policy objectives appear to have been made.

6 LOCAL REPRESENTATION

6.1 A total of 81 neighbouring properties were notified about the application and invited to comment. The application has been publicised by way of one or more site notices displayed in the vicinity of the application site. The application has also been publicised in the local press. The number of representations received from neighbours, local groups etc in response to notification and publicity of the application were as follows:

No of individual responses: 19 Objecting: 18 Neutral: 1

6.2 Croham Valley Residents Association have objected to the application for the following reasons:

- At the Pre Application stage the Planning Dept and the Planning Committee where misled as regards the access routes to the School by omitting to make any mention of the very busy school gate on to Hollingsworth Road.
- The full planning application continues to make not mention of the very busy school gate on to Hollingsworth Road. (Officer comment: The gate on to Hollingsworth Road, whilst in the ownership of the applicant is outside of the application site (red line boundary on site plan), which relates solely to the Junior School).
- The issue with the very busy school gate on to Hollingsworth Road is that the School's practice of allowing parents and pupils to access the School via a back gate adjacent 34 Hollingsworth Road has caused an ever increasing number of parents to charge up Hollingsworth Road in their cars to compete for position nearest that gate at school arrival and departure times. They not only joust for

position in the road with residents, but also with refuse trucks and delivery vehicles. The road is regularly "gridlocked". The School has said that this gate access is "pedestrian only", apparently preferring to turn a blind eye to the daily traffic chaos that results from it in Hollingsworth Road at 8am and 4pm. The practice has become very dangerous - not only for school children, but also for residents. Hollingsworth Road was never designed to take 50 cars (or more) twice a day in this way and, as the school expands, the situation is set to get worse. A much higher percentage of private school pupils arrive at school by private cars. This has become a nightmare for residents with car parking across their drives.

- One cannot underestimate the danger, only recently a pupil ran out of the gate into the side of moving car and not mention the number cars that have been hit in the location due to the congestion.
- The school needs totally close off the use of this gate.
- If not Hollingsworth Road needs to have some form of very restrictive controlled access implemented that prevents parents dropping their children off in this cul de sac.

6.3 The following issues were raised in representations that are material to the determination of the application, and they are addressed in substance in the next section of this report:

Objection	**Officer comment**
Transport and Highways impacts	
Use of Hollingsworth Road for school drop off and pick ups causing traffic congestion and danger with total disregard of local residents	Addressed below in Paragraphs 8.135 – 8.142
The Transport Statement does not mention the access onto Hollingsworth Road or provide any transport data	
Further expansion of the school without addressing the use of the Hollingsworth Road access is a danger to school users and residents	
Concern over construction workers using Hollingsworth Road for parking and access to the site	
A condition should be imposed to prevent the use of the rear gate	
The second existing access on Coombe Lane should be reinstated	

6.6 DESIGN REVIEW PANEL FEEDBACK

The scheme was presented to the Council's Design Review Panel (DRP) on 4th May 2023. The Panel's comments are summarised as follows:

Massing

- The Panel considered that the massing and way the building sits with the site is positive.

- The Panel liked the way the building has been broken into three parts.
- They considered that the two rear blocks work well, however the frontage block is not so successful. The curve and the blank corner don't work. The building should be more outward facing. The elevations should be brought more in harmony with one another.

Architectural Expression

- The Panel questioned the relationship of the proposed building to the rest of the school site. How did it speak to the adjacent buildings? The connection was not balanced right.
- The building doesn't need to be so 'hidden'.
- The Panel requested to see more boldness in the material palette. The original buildings on site are not shy and this should be celebrated.
- The Panel liked the use of timber and felt that there could be more timber within the material palette.
- The Panel like the concept of the spine however felt that its appearance has been watered down too much in the latest iterations.
- The entrance is key and needs to be more dominant.
- Public art at the entrance is encouraged.

Landscape and Amenity

- The Panel like the access approach.
- The landscape approach responds well to the setting.
- The Panel noted that the teaching environment will be amazing thanks to the landscaping opportunities e.g. rain gardens, network of routes, planting.
- The Panel suggested the applicant think more flexibly about the MUGA and what it could be e.g. outdoor performance area, rain water attenuation area.
- Outdoor covered spaces for teaching will be really valuable.
- Connectively to the rest of the site should be better achieved by use of landscaping. The applicant should look beyond the red line e.g. planting within car park, connection to the forest school.
- If trees are removed, they should be reused on site e.g. for biodiversity, for education.
- The scheme should promote the use of extensive green roofs alongside the PV panels.

Summary

- The Panel were supportive of the siting and massing of the building.
- The Panel felt that the architectural expression is lacking and should better connect with the more historic buildings at the Senior School site.
- The landscaping creates a fantastic opportunity to provide a fantastic teaching facility.

6.7 PLANNING COMMITTEE FEEDBACK

The pre-application proposal was presented to Planning Committee on 18th May 2023. The main issues raised by members at this meeting were as follows:

Principle of the Scale of the Development along the green belt

- There was a belief that the proposal was special circumstance to build along the green belt as the school was an important education establishment in the area and the development would improve the facilities of the school and there would be more children educated locally.
- The local plan stated that the investment in school expansion should be supported.
- The viability of the school could be threatened if the expansion to the junior school was denied.
- There were concerns about a potential issue with traffic management given the proximity of the tram stop to the school entrance.
- Members felt as though the proposed development would provide a significant increase in the building's dimensions.
- There was a belief that the developers should look to mitigate the environmental impact of the construction work carried out on the stie.
- The proposed development should add to the green belt and the plan to increase the biodiversity in the area was encouraged.
- Members acknowledged that the school would open their grounds to the wider public once the development had been completed and asked for clarification on the activities that the school intended to host on their site.

<u>Location, development and massing</u>

- Members were pleased with the massing of the proposed development, and they approved of the additional trees that would be introduced near the entrance of the site.

<u>Design, appearance and materiality of the building</u>

- Members stated that they would prefer a more traditional design of red brick for school buildings.
- Members proposed the recycling of rainwater and asked the developers to make better use of their flat roof space.
- Members felt as though it was important to reflect the design of the main school building in the junior school design.
- However, it was also noted that trying to mimic the design of another building would be tough to execute and having the building be a complimentary colour to the main school building would be a clever alternative.
- There was some concern over the wood within the design of the building, the use of wood for the connection between the buildings was appreciated however the contrast between the wood and the colour of the building would not be as complimentary in future as the colour of the wood may change slightly.
- Members expressed concern at the lack of window space in the proposed development.

<u>Landscape and Ecological Gain</u>

- There was a suggestion that the developer could introduce green walls which would allow the building to blend into the green belt, however this sentiment was not shared by all of the Members.
- Members suggested that the developers could implement a cluster of trees to give a mini forest appearance on the site.

- Members proposed that there be facilities for children to learn how to plant and harvest produce.
- Members felt as though there should be consideration to sensory approaches to the design to provide the children with different textures, colours, smells etc.
- There was the belief that more people would be able to enjoy the green belt as the proposed development would allow more children to attend the school.
- Members asked whether the developers could do more planting in the surrounding area of the site.

Other Matters

- Members asked when the application was presented to the committee, would the applicant be able to evidence that because of the proposed development the school would be able to do more to help the more disadvantaged members of the community.
- Members queried whether developers would use local builders and whether the building supplies would be sourced locally.
- Members believed that there would be a high percentage of parents who would drive their children to the school and the increase in capacity of the school would result in more cars in the surrounding area.
- Members enquired whether the developer could introduce a more direct access path to the school.
- Members believed that the developers should explore the implementation of a travel plan.

7 RELEVANT PLANNING POLICIES AND GUIDANCE

Development Plan

7.1 The Council's adopted Development Plan consists of the London Plan (2021), the Croydon Local Plan (2018) and the South London Waste Plan (2022). Although not an exhaustive list, the policies which are most relevant to the application are:

London Plan (2021)

- GG1 Building Strong and Inclusive Communities
- D1 London's form, character and capacity growth
- D3 Optimising site capacity through the design led approach
- D4 Delivering Good Design
- D5 Inclusive Design
- D8 Public Realm
- D12 Fire Safety
- D14 Noise
- S1 Developing London's Social Infrastructure
- S3 Education and Childcare Facilities
- S5 Sports and Recreation Facilities
- HC1 Heritage Conservation and Growth
- G1 Green Infrastructure
- G2 London's Green Belt
- G5 Urban Greening
- G6 Biodiversity and access to nature

- G7 Trees and Woodlands
- SI 1 Improving Air Quality
- SI 2 Minimising Greenhouse Gas Emissions
- SI 3 Energy Infrastructure
- SI 7 Reducing Waste and Supporting the Circular Economy
- SI 8 Waste Capacity and Net Waste Self-Sufficiency
- SI 12 Flood Risk Management
- SI 13 Sustainable Drainage
- T1 Strategic Approach to Transport
- T2 Healthy Streets
- T4 Assessing and Mitigating Transport Impacts
- T5 Cycling
- T6 Car Parking
- T7 Deliveries, Servicing and Construction
- DF1 Delivery of the Plan and Planning Obligations

Croydon Local Plan (2018)

- SP4 Urban Design and Local Character
- SP6 Environment and Climate Change
- DM10 Design and Character
- DM13 Refuse and Recycling
- DM14 Public Art
- DM16 Promoting Healthy Communities
- DM17 Views and Landmarks
- DM18 Heritage Assets and Conservation
- DM19 Providing and Protecting Community Facilities
- DM23 Development and Construction
- DM24 Land Contamination
- DM25 Sustainable Drainage Systems and Reducing Flood Risk
- DM26 Metropolitan Green Belt
- DM27 Protecting and Enhancing our Biodiversity
- DM28 Trees
- DM29 Promoting Sustainable Travel and Reducing Congestion
- DM30 Car and Cycle Parking in new development
- DM46 South Croydon

7.2 The Development Plan should be read as a whole, and where policies conflict with each other, the conflict must be resolved in favour of the policy contained in the last document to be adopted, approved or published as part of the development plan, (in accordance with s38(5) of the Planning and Compulsory Purchase Act 2004).

Planning Guidance

National Planning Policy Framework (NPPF)

7.3 Government Guidance is contained in the NPPF, updated in September 2023, and accompanied by the online Planning Practice Guidance (PPG). The NPPF sets out a presumption in favour of sustainable development, requiring that development which accords with an up-to-date local plan should be approved without delay. The NPPF

identifies a number of key issues for the delivery of sustainable development, those most relevant to this case are:

- Achieving Sustainable Development
- Promoting Healthy and Safe Communities
- Promoting Sustainable Transport
- Making Effective Use of Land
- Achieving Well-Designed Places
- Protecting Green Belt Land
- Meeting the Challenge of Climate Change and Flooding
- Conserving and Enhancing the Natural Environment
- Conserving and Enhancing the Historic Environment

SPDs and SPGs

7.4 There are also several Supplementary Planning Documents (SPD) and Supplementary Planning Guidance (SPG) documents which are material considerations. Although not an exhaustive list, the most relevant to the application are:

- National Design Guide (2021)

8 MATERIAL PLANNING CONSIDERATIONS

8.1 The main planning issues raised by the application that the committee must consider are:

1. Principle of development in the Metropolitan Green Belt
2. Design, Townscape and Heritage
3. Impact on sports pitches
4. Trees, landscaping and biodiversity
5. Quality of accommodation provided
6. Impact on adjoining occupiers living conditions
7. Highway impacts
8. Environmental Impacts – Building performance, contaminated land, flood risk, air quality, noise,
9. Other Planning Issues
10. Conclusions

Principle of development in the Metropolitan Green Belt

Policy Context

8.2 Section 13 of the NPPF (2023) refers to the protection of Green Belt land. Paragraph 147 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 148 says that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

8.3 Paragraph 149 outlines that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this include:

b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: – not have a greater impact on the openness of the Green Belt than the existing development.

8.4 Policy G2 of the London Plan (2021) refers to London's Green Belt and says that the Green Belt should be protected from inappropriate development: 1) Development proposals that would harm the Green Belt should be refused except where very special circumstances exist, 2) subject to national planning policy tests, the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported.

8.5 Croydon Local Plan (2018) Policy DM26 refers to the Metropolitan Green Belt. The Council will protect and safeguard the extent of the borough's Metropolitan Green Belt by applying the same level of protection as national planning policy. In considering whether extensions to existing buildings are disproportionate or if any proposed structure harms the openness of Metropolitan Green Belt the Council will have regard to:

a. Changes in the floor space and volume of buildings;
b. The floor space and volume of all previous extensions (since 1948), alterations and developments within the curtilage of the dwelling;
c. Use of basements and roof spaces as living areas;
d. Whether there is an increase in the spread of buildings across the site, in particular where visible from public vantage points;
e. The size of the curtilage and character of the surrounding area; and
f. Whether ancillary structures have an urbanising effect.

Whether the proposals constitute inappropriate development

8.6 As noted above, Paragraph 149 of the NPPF outlines exceptions within the Green Belt that could be considered as appropriate. This includes the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces.

8.7 Officers do not consider that the proposal constitutes development that is captured by any of the relevant exceptions and this is because, as a result of the site planning history, the proposal would introduce development in the Green Belt that would be significantly greater in floor space and volume than the existing structures and is therefore inappropriate development.

Relevant Planning History

8.8 Planning permission was granted in 2015 (reference 15/01323/P) for the construction of two three-storey buildings to provide replacement residential student

accommodation. In order to justify the development of these buildings in terms of the impact on the openness of the Metropolitan Green Belt, Condition 8 of that permission required partial demolition of some of the buildings on the Junior School site. Figure 6 below shows the extent of the existing structures to be demolished (shaded in red), which amounts to a total footprint of 1792sqm (referred to as Queens House).

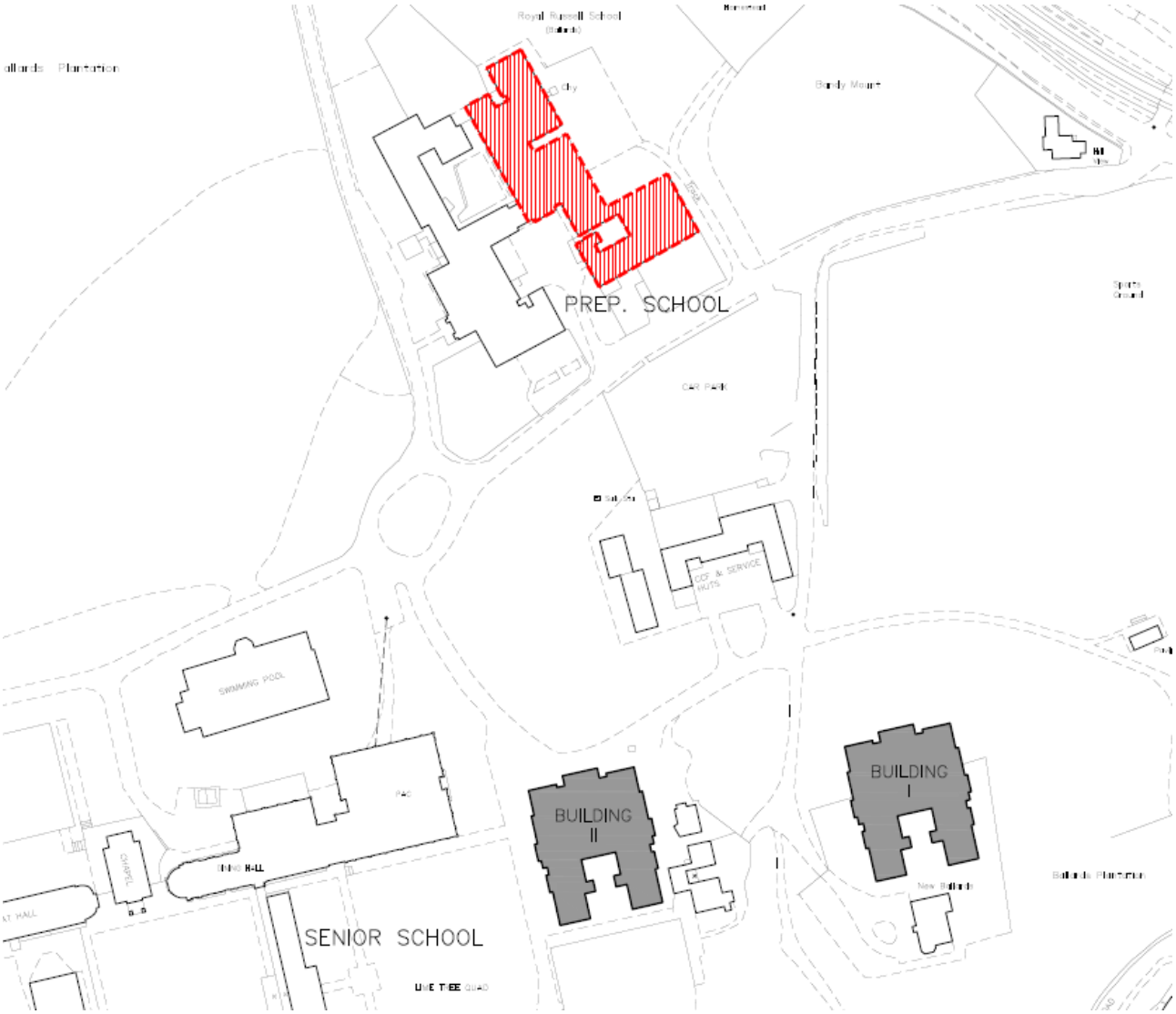

Figure 6. Demolition required by planning permission 15/01323/P

8.9 The development permitted under 15/01323/P has been completed to site, however the demolition required to mitigate the development has not been implemented in full. The reasoning for this is because the boiler and main heating system for the Junior school is located with Queens House. This sits at the base of a three-storey element of the building and it is evident that this portion of the building cannot be demolished if the junior school is to function. This appears to be a significant oversight of the assessment of application 15/01323/P. Subsequently, planning permission has been granted to extend the time allowed for the demolition, the aim of which is to allow the junior school to continue to function, and align with the wider redevelopment aspirations for the Junior School building (22/02544/CONR).

8.10 The consequences of this previous permission, and required demolition, are that the resultant volume of building that is retained as the existing junior school is considerably less than existing.

8.11 Now as proposed, the increased mass, when taking into account the volume of the new building, plus that of the boarding houses approved under 15/01323/P (as the volume to be demolished by condition is made negligible as a result of the proposed new mass), would have a greater impact on the openness of the Green Belt than that of the existing development (as granted by the restrictions of the planning permission). Therefore, the proposal would introduce development in the Green Belt that would be significantly greater in floor space and volume than the existing structures and is therefore inappropriate development.

Footprint analysis

Existing gross external footprint = 3,443sqm
Amount left after removal of floor space by Condition 8 of 15/01323/P = 1,698sqm
Proposed gross external footprint = 2,072sqm
= Increase in footprint = +**327sqm**

Floor area analysis

Total gross external floor area of existing school = 5,735sqm
Amount to be demolished by Condition 8 = 3,231sqm
Remaining space = 2,504sqm
Proposed external floor area of new school = 3,973sqm
= Increase in floor area of = +**1,469sqm**

The scheme proposes 20 classrooms (which is 1 more than the current school).

8.12 The applicant has made the argument that, for the following reasons, the proposed school would not have a greater impact on the openness of the Green Belt than the existing development:

- Regardless of exact timings of when buildings are demolished and why, at the end of the process this area of previously developed Green Belt land will be more open than it is currently.

- The proposed school will have a more compact form than the existing Junior School, making best use of land, and improving the physical openness of this part of the Green Belt. The current school contains areas of enclosed courtyard space which, while not contributing to the built footprint, also do not contribute to the visual openness of the site as they cannot be seen other than from above. The result is that visually, the existing school appears to use much more of the site. The proposed Junior School is located solely on the eastern part of the site and does not include enclosed courtyards or other hidden open spaces. Instead the entire central and western portion of the site will be kept open and used for outdoor play and landscaping. Therefore, the site will be much more open overall.

- With the demolition required by Condition 8 being taken into consideration, the actual ‘built area’ of the site (the footprint) will only be increased by 327sqm.

- The form of the building makes best use of the natural slope, seeking to ground the building in the topography, siting it down into the natural northward sloping site and presenting a single storey to the east and views from the entrance to the school grounds.

- The massing has been broken up into three distinct building forms allowing the building to sit more comfortably in the Green Belt context. A connecting bridge is proposed which allows for views through the proposed school and allows the landscaping to flow through and around the building.

- The materials of the building will be more complementary to the surrounding Green Belt setting, reducing visual impact. Materials will both complement the character of the existing buildings on campus which are constructed predominantly of brick and stone, but also ground the building in the woodland setting with elements of timber and warmer tones. The existing buildings are of unattractive 1960s construction which is considered to detract from the Green Belt woodland and parkland setting of the school. The current areas of hardstanding contrast with the surrounding landscape. The proposed Junior School includes external areas designed to work in harmony with the existing woodland Green Belt setting.

- There will be additional planting along the eastern boundary of the proposed Junior School which will soften views of the building from both within the site and the entrance to the school.

- Existing and proposed views of the Junior School are included in the submitted design document (see images further below in this report) and illustrate the positive impact the new school will have on the setting of this area of the campus. The proposals sit much more comfortably within the topography and thus appear lower than the existing school from the main entrance. The surrounding woodland will be visible above and provide a backdrop to the proposed building. The materials also work to soften the visual impact. Furthermore, the proposals will include a significant amount of planting that will help to soften the view of the new building from this road. From other areas of the campus, in particular the western side, the new building is less visible as it is contained within the eastern portion of the site, with the western half dedicated to outdoor play and landscaped areas. It is noted that the land beyond the main the School campus is very well wooded so views of the new building from outside the campus are restricted to limited views at the entrance off Coombe Lane.

- The applicant has provided floor plans of the existing junior school provision which evidences that the proposal is replacing (and improving) facilities that the school already has.

- The increase in floor space in comparison to the existing junior school provision is as a result of the one additional classroom and the thickness of the external walls which is required to provide a high level of thermal insulation (to meet current day requirements).

- The applicant has explored all possibilities to undertake other demolition on the school campus, however all of the remaining buildings are in constant use and are all essential to the schools function.

- Alterative locations for the building have been considered however the proposed site is most appropriate because; the whole campus is in the Green Belt; the proposal is on the site of the existing junior school and therefore previously developed land; other options would involve use of greenfield land, affecting playing fields and pitches.

8.13 Whilst the positive design and landscaping moves listed above are noted by the local planning authority, and will be discussed in the sections below, impact on the openness of the Green Belt needs to measured in terms of building mass (floorspace and volume) not just footprint and with regard to the site history. As such, officers maintain that the development amounts to inappropriate development in the Metropolitan Green Belt, and as such should not be approved except in very special circumstances.

The Very Special Circumstances

8.14 Paragraph 147 of the NPPF states that: *"Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances."* Paragraph 148 states that: *"Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations."*

8.15 The applicant has identified a number of 'very special circumstances' which they consider would cumulatively outweigh the harm to the Green Belt by reason of inappropriateness and to justify the development:

8.16 Planning policy support - There is planning policy support for providing adequate school facilities. Paragraph 95 of the NPPF states that it is important that a sufficient choice of school places is available to meet the needs of existing and new communities and that great weight should be given to the need to create, expand or alter schools. Policy S3 of the London Plan states that development proposals should ensure that there is no net loss of education or childcare facilities. Boroughs should ensure the location and provision of a range of childcare services in different types of settings to meet the needs of local communities. Croydon Local Plan Policy SP5 says that the Council will support investment in the improvement and expansion of primary and secondary schools and special schools to meet the needs of the community and its growing population. Pre-school facilities will be provided, enhanced and updated in alignment with the growing population. Paragraph 7.15 says that the quality of educational facilities needs continual renewal and improvement to meet modern standards. Additionally, the educational estate needs to be expanded to meet the requirements arising from housing and demographic growth and to fulfil the objectives of Croydon's Sustainable Community Strategy. This will require both the expansion of existing schools and the provision of new schools.

8.17 There is clear national and local policy support the provision and improvement of schools and their facilities, which should be given considerable weight in planning decisions.

8.18 Quality of existing buildings - The new Junior School is proposed out of necessity rather than desire. The existing Junior School is one of a collection of buildings at Royal Russell School that were built in the 1960s of 'Laingspan' construction, a method which has a limited structural lifespan. The Laingspan buildings are of prefabricated concrete construction held in place by tensioned steel cables. However, these steel elements are vulnerable to rust and consequently Laingspan buildings have a limited life. A number of these buildings, such as Cambridge Boarding House, have already been

demolished and replaced. Those that remain, including the Junior School, now require more regular engineering checks and urgently need to be replaced. A recent structural survey noted that there is little time left for the current Junior School buildings.

8.19 Regardless of the Laingspan issues, the existing Junior School is now aging. The existing spaces are no longer fit for purpose and do not meet the requirements and standards of the school for teaching and learning. The new Junior School will be of a much higher quality with spaces specifically designed both for the school's needs and to accord with modern day teaching standards.

8.20 The existing Junior School has a capacity for 380 pupils (based on the provision of 19 classrooms each able to accommodate 20 pupils). However actual pupil numbers are lower than this as the school does not have sufficient supporting spaces in terms of quantity and quality e.g. insufficient space for gatherings, dining space, specialist teaching space. The proposed building is significantly more efficient than the current building. The proposed building will have benefits for pupil learning, comfort and wellbeing.

8.21 Building Bulletin 103 (a Department for Education guidance document that aims to assist those involved in creating design briefs for new schools) has been used in parallel with an analysis of the curriculum being offered by Royal Russell to determine and develop the areas required for the various spaces within the proposed school. The range and number of specialist teaching spaces in the proposed new Junior School is equivalent to the current provision, to meet the needs of the school's successful curriculum.

8.22 The existing Junior School is inefficient in terms of its circulation space and built fabric, resulting in high energy use. The proposed school is much more efficiently planned than the existing school, which will have significant operational and sustainability benefits (see further detail below).

8.23 Implications of Condition 8 demolition – As outlined above, some of the spaces that are required to be demolished by Condition 8 of planning permission 15/01323/P are integral to the functioning of the Junior School (e.g. plant space, gym, classrooms). Therefore this demolition cannot commence and allow the existing Junior School to operate.

8.24 The calculation to determine the area of the Junior School to be demolished in order to balance out the area of built development in the Green Belt was based purely on footprint at the time of determining application 15/01323/P. It is noted that the footprint of the proposed Junior School exceeds the footprint of the existing Junior School (which is left once the required demolition has taken place), by 327 sqm, which the applicant considers could be viewed as not being materially larger than the existing building.

8.25 When all of the floorspace to be demolished by Condition 8 is removed from the existing school floor space, there is not adequate space left to provide a replacement Junior School which is fit for purpose. Building within the parameters of the remaining floor space would not enable the school to reprovide current provision, nor improve necessary assembly or dining/support spaces to current standards and guidance.

8.26 Demonstration of educational need

8.27 There are no sites in this part of the borough that are allocated for educational use in the local plan. All sites allocated for education use within the current Local Plan have either been developed or granted planning permission.

8.28 The Royal Russell School campus lies entirely within the Green Belt. The school does not own any land outside of the existing Green Belt campus. The applicant ascertains that the replacement Junior School is required to be located on the Royal Russell School campus. The campus operates a central service function for operational matters and use shared facilities such as catering, sports and boarding. The 'through school' provision is an intrinsic part of the Royal Russell business model, and is important to pupils and parents. Feedback (as evidenced in the 2022 parent satisfaction survey) shows that parents hold the 'through provision' near the top of their agenda when considering Royal Russell Junior School. Furthermore, year 5 and 6 are always at capacity as parents see this as an entry point to the senior school at year 7. More than 94% of year 6 pupils will progress on to the Senior School and similar rate stay onto Year 11. At least 60% of reception pupils progress through to Year 7.

8.29 The loss of the Junior School from the site would cause irreparable damage to the school from an education perspective, and as a business, with the need for up to 380 pupils to find alternative school places, and 50+ staff to find alternative employment, and a loss of income in excess of £5m per annum.

8.30 Royal Russell School is an extremely popular option for parents in the area seeking an independent education for their children. There is clear demand, and therefore an educational need, for the replacement Junior School to be provided. This is evidenced by:
- The current pupil roll and high demand.
- Royal Russell School receives 7 applications for every place.
- Current un-met demand due to insufficient facilities (capacity is 380).
- The nursery is over-subscribed.

8.31 Primary school provision and capacity within LB Croydon – In LB Croydon's 2023 Education Estates Strategy Report (2022 – 2025), the council noted that there were more places than pupils at both primary and secondary levels, but the balance between the two varied across the borough, within educational planning areas and particularly school-by school: shortages of places at popular schools can exist alongside surplus places at others. While demand for state primary school places has reduced in LB Croydon as a whole, due to falling birth rates and changes in immigration, this has mainly been experienced in the north west and east of the borough. Over the next three years, the expected growth in pupil numbers varies widely: in some places, particularly in the central and south of the borough, demand for school places is expected to increase due to pupil yield from planned housing developments. For example, there has been a higher than expected increase in demand for school places in the south-west due to pupil yield from the Cane Hill housing development in Coulsdon, as well as in the centre of the borough. In summary, while there are currently sufficient primary school places in LB Croydon, there is a shortfall of places at popular schools, and additional need is linked to new housing development in central and southern parts of the borough. Royal Russell School lies within the South East primary school planning area of the borough.

8.32 The applicant has provided data for each of the nine closest state primary schools to Royal Russell, including their 2022 admissions number, the number of applications

received for 2022 and the furthest straight line distance for 2022 intake. It can be seen that each was oversubscribed, most by a significant amount, and that generally, the furthest distance for intake is very small (less than a mile for six of the nine schools listed). This suggests that primary school pupils in the area may not have received their first choice school place.

Primary School (and straight line distance from Royal Russell)	2022 admissions number	Applications received for 2022	Furthest straight line distance for 2022 intake
Park Hill Infants (1.3 miles from Royal Russell)	90	325	0.374
St Johns C of E Primary School (1.05 miles from Royal Russell)	60	206	N/A
Harris Primary Academy Benson (1.28 miles from Royal Russell)	30	109	0.717
Courtwood Primary School (1.56 miles from Royal Russell)	30	119	0.363
Forestdale Primary School (1.3 miles from Royal Russell)	60	183	0.438
Gilbert Scott Primary School (0.92 miles from Royal Russell)	30	44	4.187
Selsdon Primary and Nursery (0.93 miles from Royal Russell)	90	102	2.266
Ridgeway Primary School (1.29 miles from Royal Russell)	90	317	0.649
St Peters Primary School (1.06 miles from Royal Russell)	60	220	0.683

Table 1: Primary school admissions and demand

8.33 Another good indicator of local demand for state school places is Coombe Wood School, located in close proximity to Royal Russell School. When it opened in 2018, Coombe Wood School received 530 applications for 180 places. While this is a secondary school, the school notes that this level of applications demonstrates the strength of demographic demand in the area. Coombe Wood School also provides a precedent of education development on a Green Belt site (although the site was removed from the Green Belt in the local plan) for the provision of school places in the local area.

8.34 The applicant contends that, whether or not there is an overall surplus in the state sector, it remains the case that there is an existing Junior School at Royal Russell, an essential need to replace the current building for current pupils, and a clear demand for places. National and local planning policy strongly supports a choice in education provision (as set out in NPPF paragraph 95, and Croydon Local Plan Policy SP5.9 and SP5.11), and Royal Russell makes an important contribution to this.

8.35 Alternative Independent School Provision in LB Croydon – The applicant has provided an analysis of alternative independent school provision in the borough. There are no other schools in the area which cater for children from 3 years to sixth form of mixed gender. The closest independent school is Oakwood School (mixed school for ages 3-11) which is due to close and be relocated to Crystal Palace. This may result in

additional demand in the local area. Oakwood School is relocating in order to expand capacity, which highlights demand for private school places in the area. At the date of writing, there are more than 12 students who have made the choice to move from Oakwood School to Royal Russell Junior School as a close and convenient alternative. All the independent schools in close proximity are oversubscribed and have a waiting list of pupils.

8.36 Royal Russell caters for both mixed gender and offers the opportunity to progress from the nursery, through the Junior School to the Senior School. No other school in the area provides a comparable opportunity.

8.37 If the Junior School at Royal Russell did not exist, this would result in approximately 380 pupils returning to the state system, or, more likely, seeking alternative private education. The applicant states that there is a clear demand and educational need for the replacement Junior School at Royal Russell School. The proposed replacement Junior School would therefore make an important contribution to meeting the planning policy objective of paragraph 95 of the NPPF which stipulates that it is important that a sufficient choice of school places is available to meet the needs of existing and new communities. The proposed replacement school would accommodate an educational requirement within LB Croydon, and align with Local Plan Policies SP5.9 and SP5.11 which support investment in the improvement and expansion of primary and secondary schools, and the provision, enhancement and updating of pre-school facilities.

8.38 Other special circumstances

8.39 Educational support - The School provides support for disadvantaged pupils setting aside around £3.1m annually to provide pupil fee reductions such as academic scholarships and bursaries for disadvantaged pupils from Croydon, South London and beyond. The reduction allows 72 pupils whose families would have otherwise been unable to afford school fees to access Royal Russell, and their contribution greatly enriches the school community.

8.40 Royal Russell also provides significant support to enhance the education experience of children in other local schools. The school's outreach work with the local community supports and provides additional opportunities to a significant number of local children through knowledge sharing with local and international schools and the sharing of facilities such as their indoor swimming pool. For example, the Junior School invites pupils from six local primary schools to participate in their annual Symposium which is a celebration of teaching and learning, where pupil experience different sports taught by specialist coaches.

8.41 Community use - Royal Russell School plays a big part in supporting key initiatives within the Borough. This includes sharing its facilities with, and providing spaces for community organisations, fundraising events, neighbouring schools, other organisations and businesses, foundations and sports teams. A full list of the community uses the school supports has been provided within the Planning Statement and is attached as Appendix A of this report.

8.42 Through working with the Rowdown Foundation, the Junior School provides its facilities for use by pupils of other schools in the local area who have the drive and ability to expand their learning beyond the normal curriculum, with teachers providing specific teaching and learning expertise. Many of those children are then accepted into

Royal Russell and other local independent schools on life changing bursaries and scholarships.

8.43 The new Junior School complex will provide additional facilities to share for community use, such as a MUGA, drama studio, gymnasium, better quality classrooms for the holiday club, and other sports facilities such as the junior soccer pitch. The addition of the new Junior School will therefore enhance what is already offered by the wider School, making a significant contribution. Provision of the new Junior School will enable the school to maintain its estate and facilities, and continue its shared use of facilities with other schools and the wider community.

8.44 Employment provision and economic benefits - The School employs over 350 staff, the majority of whom live within a 10 mile commuting radius of the School, with a large number living within the London Borough of Croydon. Approximately 40 staff live permanently at the school to provide support for the 185 pupils who live as boarding pupils on the campus. The school also acts as a purchaser of goods and services from the local economy. Junior School staff numbers total 62. The improved educational offer of the replacement Junior School, and the modest increase in capacity, will help the school to fund the new Junior School building. It is important to safeguard the economic resilience and continuation of the school to help ensure that these jobs, pupil places, pupil support and support of the local economy remains, and indeed, provides for further jobs and economic growth.

8.45 Environmental benefits - Due to the layout, age and materials of the existing Junior School it is highly inefficient and unsustainable. The new Junior School will be significantly more sustainable, applying a whole life carbon approach and fabric first approach. The building will be constructed for longevity and durability.

8.46 The proposed new building and grounds will promote health and well-being by providing excellent access to daylight and a visual connectively to nature. The scheme will achieve an Urban Greening Factor (UGF) of around 0.88 (significantly exceeding the minimum value of 0.3, and the current value of 0.16). The strategy includes extensive tree planting, amenity grass, ornamental planting and native wildflower planting. The scheme also achieves a Biodiversity Net Gain (BNG) of 156.7% for habitats and 13.5% for hedgerows.

8.47 The proposed building will manage surface water runoff through SuDS strategies that include filter drains, a soakaway, permeable block paving, rain gardens and porous asphalt.

Assessment and Conclusion

8.48 Condition 8 attached to planning permission 15/01323/P requires a large part of the existing junior school to be demolished to enable development of boarding houses associated with the senior school on site. Whilst the reasoning for the condition was/is sound, its imposition was significantly flawed as the result is that it proposes significant limitations on the redevelopment the junior school site. The junior school cannot function if the floor area to be removed is as significant as required by the condition. It can be assumed that it was not the purpose of Condition 8 to hamper or harm the functionality of the junior school.

8.49 The proposal now before us seeks to re-provide an existing use. It is not proposed to significantly increase educational provision at the school. Evidence has been provided to show the existing capacity of the school. One additional classroom is proposed which will future proof and help to fund the redevelopment.

8.50 It is clear that the existing buildings have come to the end of their lifespan and that redevelopment needs to happen. It is also clear that the existing building does not function in a sustainable way. Evidence has been provided to show how the replacement building has been designed to current required standards for school provision and to accord with current Building Regulations and sustainability objectives. Officers therefore consider that the size of the replacement building in the Metropolitan Green Belt has been justified.

8.51 The proposed development would have a significantly more compact form than the existing Junior School and the layout and design has evolved via pre-application discussions to ensure the development has the least possible impact on the openness of the Green Belt as possible (further detail in this regard in the section below). The proposed layout provides excellent opportunity to improve the relationship of the Junior School with its woodland setting and to implement a comprehensive landscaping strategy which will increase urban greening, biodiversity and sustainable drainage.

8.52 In terms of educational need, the applicant has outlined the importance of retaining the Junior School on the established Royal Russell campus for the business and functional needs of the school. There are no other sites within the Local Plan allocated for a school use. Whilst overall there appears to be space within the state school system to accommodate the 380 pupils were the school to be lost, demand for school places in the area surrounding the school is greater. No other independent schools in the area provide educational provision for the same demographic as Royal Russell School and it is clear that demand for placements at the school are high.

8.53 The school has been through a rigorous pre-application process with the local planning authority. Officers have pushed the applicant hard to provide evidence of 'Very Special Circumstances'. The applicant has listened to the local planning authority and have made significant amendments to the layout and scale of the development in light of Green Belt concerns. The number of proposed classrooms have been reduced (by 4) and the massing and layout has evolved to work far more successfully with the existing topography and woodland setting (full details below).

8.54 Given all of the above, officers are minded to accept the applicants justification.

Design, Townscape and Heritage

8.55 London Plan Policy D3 states that a design-led approach should be pursued and that proposals should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness. Policies SP4.1 and DM10.1 of the Local Plan state that the Council will require development of a high quality, which respects and enhances Croydon's varied local character and contributes positively to public realm, landscape and townscape.

8.56 In the assessment of this proposal, officers and the applicant have always been very mindful of the Green Belt and woodland setting of the site. The Junior School is surrounded on three sides by extensive woodland and greenery which has driven the design evolution of the development.

Layout

8.57 The position of the proposed new building has been driven by:

1. The necessity to preserve the openness of the Green Belt – The applicant has undertaken an assessment of other locations within the campus that could potentially accommodate the Junior School. Officers considered that siting the building on other undeveloped areas within the campus would have a more detrimental impact on the setting and openness of the Green Belt than redevelopment of this existing brownfield site.

2. In order to enable the existing Junior School to be able to function whilst the new school is being constructed, the positioning and layout of the new building has been largely dictated by the remaining already developed brownfield area. The building is proposed to be largely located over existing hard surfaced playground areas and in place of the existing medical centre which has been demolished.

8.58 Whilst this restricted location presents a challenge and, in many ways, inhibits the redevelopment of the site, it has also resulted in a building that has a significantly more compact form than the existing structures on site. A significant benefit of this is the landscape enhancements that can be made around the building. This is considered to be beneficial in terms of impact on the openness of the Green Belt.

8.59 The smaller available footprint has however also presented the challenge of creating a building that does not have a more dominant and visible presence within the Green Belt setting in terms of height and presence. The massing and form of the proposed building has been significantly altered as a result of the pre-application process, to reduce the height of the structure and to create a building that responds to the natural topography of the site.

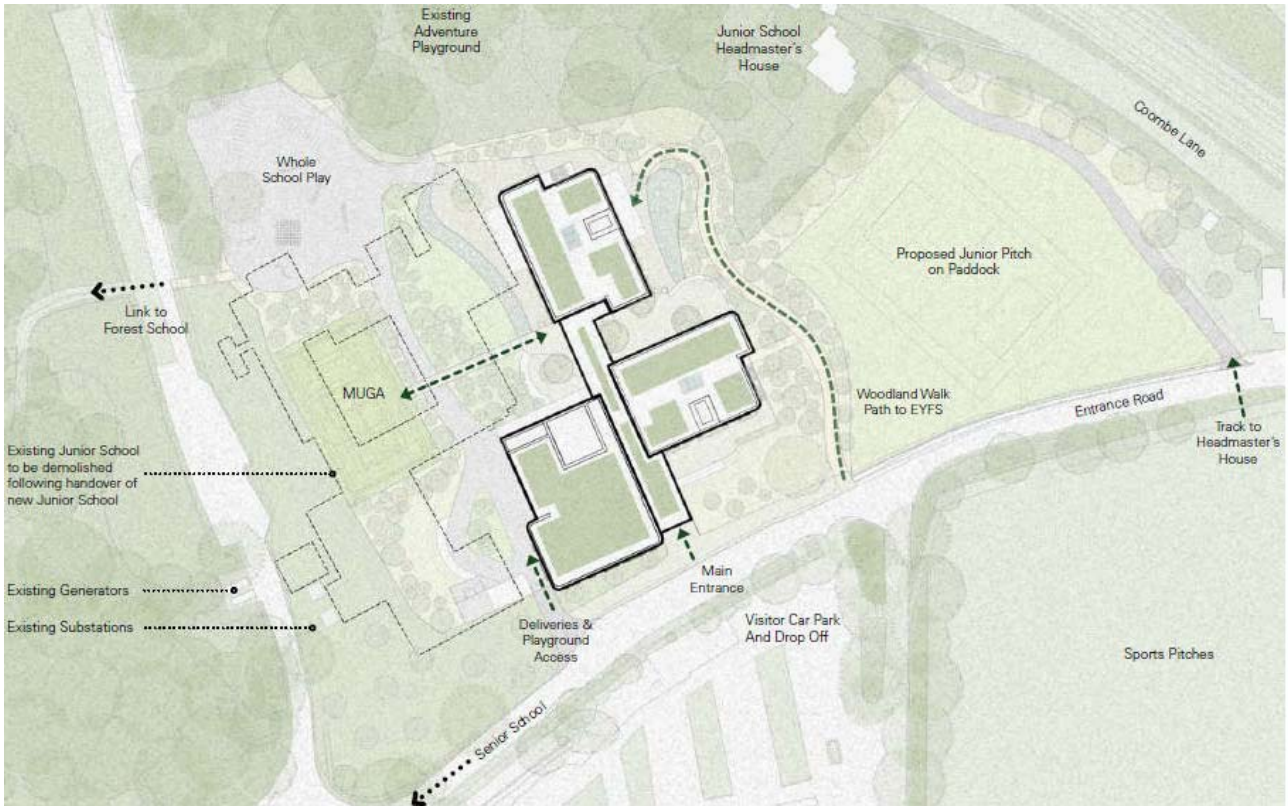

Figure 7: Proposed site layout

8.60 The drawing above shows how constructing the new building towards the eastern portion of the Junior School site will enable the current school to remain operational during the construction phase. Once built and operational, all of the existing structures on the Junior School site will be demolished (the dashed buildings on the drawing). The western part of the site will then become a larger landscaped playground, which will present a huge improvement over the current fragmented hardstanding play areas of the Junior School (landscaping discussed below).

8.61 The relationship of the proposed Junior School to the approach road is similar in scale and distance to the existing built form. There is a distance of over 120m from the development to the school access point, which provides the only view of the building from within the public realm.

8.62 The proposed built form has been broken down into 3 distinct blocks which are interconnected through a main spinal circulation route, and these blocks work with the topography of the site. Breaking up the building mass ensures that the visual presence of the building from the site access is limited.

8.63 The layout means that the Junior School's relationship with the rest of the school campus is not altered. The main access road and parking area is unaffected.

Massing

8.64 As noted above, the proposed built form has been broken down into 3 distinct blocks which are interconnected through a main spinal circulation route. The northern block hosts the nursery and reception groups (Early Years) at ground floor level, with Year 3 and 4 (Key Stage 2) classrooms above. The more central block hosts Key Stage 1 (Years 1 and 2) classrooms at ground floor level with Years 5 and 6 above (Key Stage 2). The southern most block along the access road offers the administrative function, and shared educational spaces (gym, dining hall, library, science and art rooms, staff areas, kitchen, plant etc).

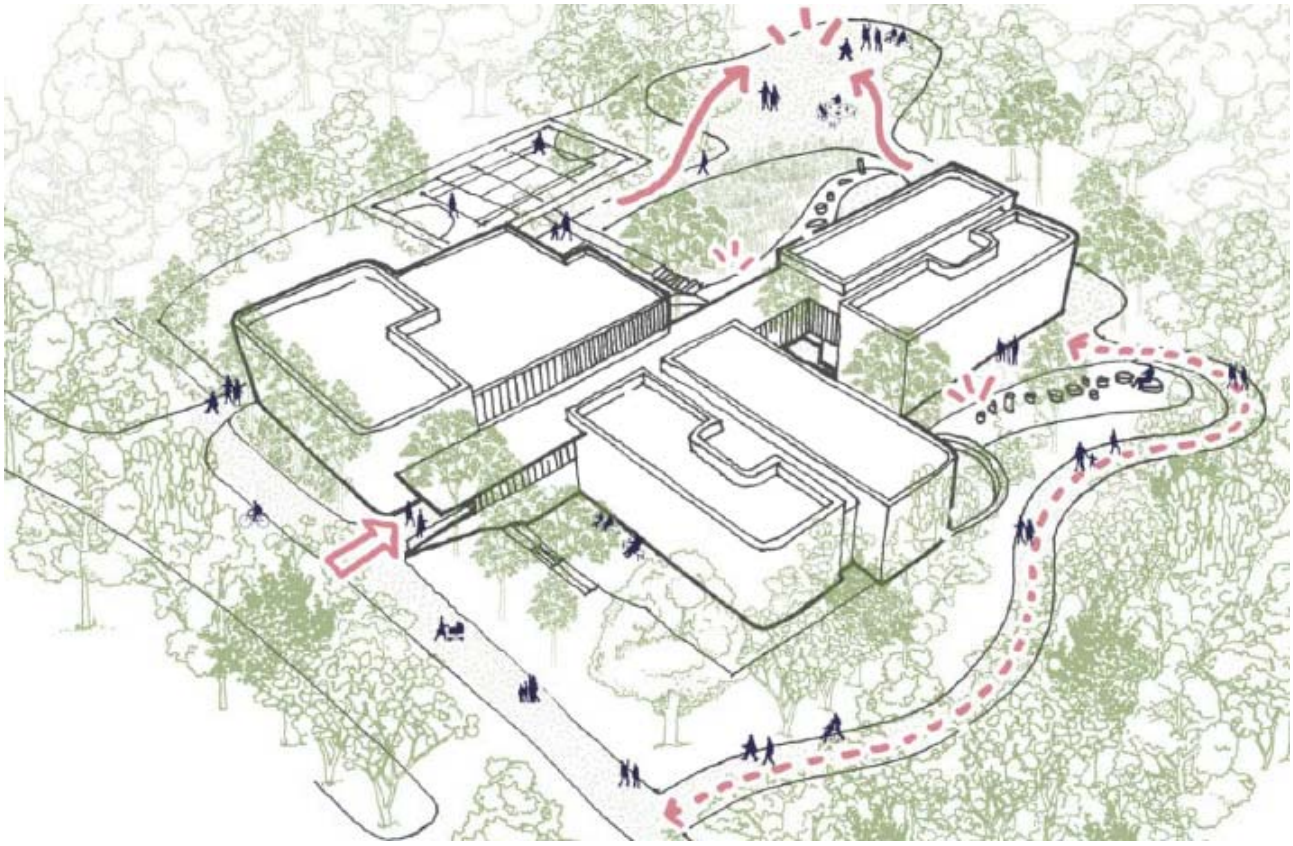

Figure 8: Illustration of massing. Build split into 3 distinct blocks with spinal connection route

8.65 Building heights across the school campus are generally two to three-storey. The proposed building is part two/part three storey and therefore the proposed building is entirely consistent with the rest of the site in terms of height. The massing form has been arranged to align towards the topography, positively using the level change and stepping down in height to the rear of the site. The main building frontage appears as a two storey mass, the lower level concealed by the change in level. The additional blocks then fall with the ground level, appearing as lower and more subservient elements of the overall built form.

Figure 9: Topography, site section and elevation south to north

8.66 Officers are of the opinion that breaking down the massing into the 3 blocks, and effectively utilising the level change of the site, reduces the impact of the massing when read from the entrance gate and from views from the north. The massing strategy prevents the building from appearing monolithic in mass which is felt to lessen the impact on the natural Green Belt setting. The overall height allows views of the woodland to be seen behind the built form which helps the building to nestle into the green setting of the campus.

Figure 10: Comparative Photomontage - Approach Road View.
Top image: Existing. Bottom image: Proposed

8.67 When viewed from the playground area to the west of the site (see Figure 11 below), it can be seen how the building steps down in level towards the woodland to the rear.

Figure 11: Proposed view from main playground (to the west of the site)

8.68 Whilst land levels fall from south to north across the site, and the building layout and design strategy does take advantage of this change, notable excavation will be required to achieve the level changes as indicated. Excavated soil will be redistributed across the site. In order to create an accessible and level multi use games area (MUGA) (as indicated in the view above), land levels to the west side of the building will be built up in part to achieve the required standards. This part of the site will not be overly visible from the front of the site as the land levels will still be lower than the existing at the frontage. This area will be well-screened by planting, and the banked built up to the western side will be covered with new woodland planting which will screen the MUGA from other parts of the campus. As such, the proposed level changes are not considered to have any harmful impact in terms of visual amenity.

8.69 The central spinal circulation bridge along with the step back of the eastern block, serves well to provide a legible and notable building entrance. The entrance also provides a linear contrast from the main blocks, which works well to separate the massing.

Figure 12: Proposed view of school entrance

8.70 Further back within the site, the central spinal circulation bridge offers a break at ground floor level which, again breaks up the massing, and provides a connection between the east and west playgrounds (see Figures 9 and 11 above).

8.71 The existing buildings on the school campus comprise a series of connected rectilinear forms composed to an orthogonal geometry (see Figure 13 below). The proposed new buildings follow this strategy (See Figure 14 below). There are also examples of historic buildings that comprise rounded building corners to soften their appearance, for example the Chapel as shown in Figure 15 below. This approach has been utilised to soften the appearance of the built form. Given the woodland setting, and the fact that the building is for younger children, officers consider this approach is successful. The buildings appearance is softened and welcoming, providing a gentle edge against the landscape setting beyond.

Figure 13: Main school campus built form

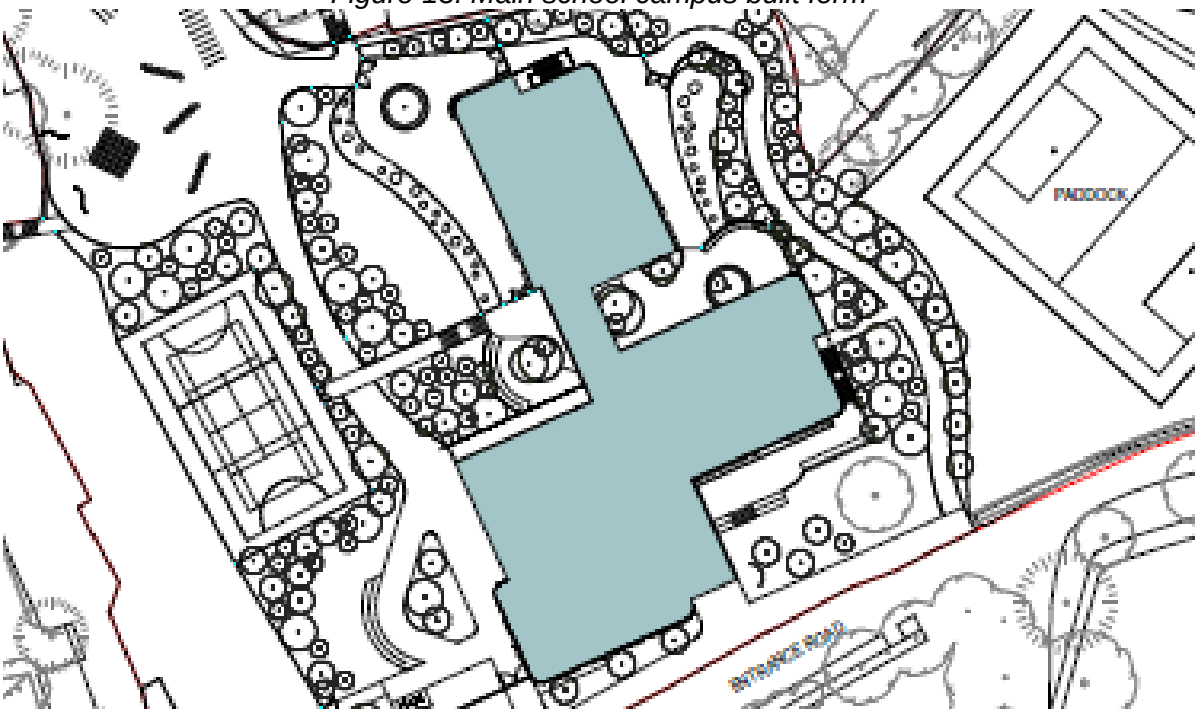

Figure 14: Proposed building layout

Figure 15: Rounded features to Chapel, with Great Hall to the left and Dining Hall to the right

Architectural Expression

8.72 The current buildings on the school site are limited in materiality. They are typically two-tone using red brick with ashlar stone facings (as can be seen in Figures 13 and 15 above). This strategy of having a limited materials palate is to be used for the proposed Junior School. The proposed external materials predominantly comprise brick and timber.

8.73 The three main blocks are defined by brickwork comprising of two tones. The frontage block comprises the main entrance and focal point of the building. It comprises a dark red brick that mirrors the tone of the brick that can be found in the historic buildings on the wider campus. The rear upper-level element of this block is finished with timber cladding. The purpose of the timber is break up the overall massing of the block and to resonate with the woodland surrounding.

8.74 The two rear blocks are divided by the horizontal datum point, with the darker red brick hue represented along the lower portion which are designated to show the split in ground level and topography and ground to building into its setting. A lighter hue is proposed for the upper storey which reduces the overall massing of the proposed blocks and provides a more desaturated tone which helps the building to blend with its natural woodland setting.

8.75 Timber has been used to form the circulation spine which connects the three blocks. The timber along the building entrance point and canopy over indicate a clear and warm entry point to the building. The green roof over the canopy further enhances the entrance and ties the building into its natural setting.

Figure 16: Proposed materiality

8.76 Recessed features around the windows and openings align with features present in other buildings within the campus. These features break up the mass of the built form and add visual interest. Brise-soleil are provided to create shade so that solar gains are minimised, the depth and height has been tested for typical sun angles to maximise their effectiveness, and also to allow generous views out. The brise-soleil will be integrated into the window system framed with aluminium to match the window frames, with timber slat inserts.

8.77 The main entrance as shown in Figure 16 above has been designed to ensure this main focal point of the building is clearly defined and legible. A large school crest will be set within the brickwork and signage will be situated above the main walkway. A generous entrance area is provided under the entrance canopy to allow for congregation. Planting will wrap around the front corner to provide an attractive feature in this area. Reclaimed stained glass pieces from the existing junior school will be used to decorate the reception area and incorporated along glazing in the spine of the structure.

8.78 The main student access into the site (For Key Stage 1 and 2) is to the western side of the front block. In order to maintain the legibility of the main school entrance, it is proposed to utilise decorative fencing/gates to clearly define the students access route. Full details will be secured by condition.

Figure 17: Proposed view from south west (from main school buildings)

Visual impact from external and other ancillary works

8.79 The position of the new building and pedestrian access routes to it, marginally eastwards of the existing Junior School, site, means that the existing vehicle access to the headmaster's house is lost, as is a small part of the existing paddock. A new vehicular access to the headmaster's house is proposed to be constructed to the western side of the site. This will sit behind existing mature vegetation so will not be visible from outside of the site. It will be constructed of grasscrete which will help it to blend into the open Green Belt setting.

8.80 The Paddock will be utilised for more formal outdoor sport and will comprise a pitch laid out for junior football (further details provided in section titled 'Impact on Sports Pitches' below). This area will remain covered in natural turf, with a new formal pitch laid out. This is not considered to have any harmful impact on the current open visual amenities.

8.81 The Multi Use Games Area (MUGA) is accepted to be a necessary part of the Junior School provision and a common feature found on school sites. Such a facility is usually quite visually intrusive by reason of its size and nature. The proposal makes attempts to blend the construction into its surrounds as far as possible. This includes using green coloured coatings to the surface. The MUGA will be surrounded by new woodland, tree planting and wildflower meadow which will, over time, screen and soften the appearance of the structure. Overall, it is considered that the MUGA has been designed as sensitively as is possible to enable it to sit comfortably within its surroundings.

8.82 The existing topography has provided some challenges in providing inclusive and accessible circulation and entrances, particularly to the early years block to the rear. A lengthy path is provided, working with the levels. This is proposed to be surrounded with new woodland planting and other soft landscaping to soften its appearance and integrate it into the surrounding natural environment.

8.83 The extensive soft landscaping is considered to have a hugely beneficial visually impact, full details below.

Public Art

8.84 In order to enhance and express local character, Local Plan Policy DM14 requires all major schemes to include public art that creates local distinctiveness and reinforces a sense of place, responds to local character, makes a positive contribution to the public realm and engages the local community in its creation.

8.85 The applicant is keen to incorporate artwork into the proposals, and this will include:

- Creative use of brickwork and fabric of the building to include the Royal Russell Crest and motto 'not for oneself but for all'
- Renovation of the historic stained glass windows in the existing Junior School, for inclusion in the fabric of the new building.
- Student created art which will be created as part of GCSE and A-Level coursework and included as part of their external art installations.
- Creation of a 'Fourth Plinth' externally to display artworks, to be used for local artists work and students.
- Use of student photography throughout the building to create a sense of community and warmth.

8.86 Officers are supportive of the public art proposals put forward by the applicant. A condition will be imposed to secure the programme of works and the ongoing management thereof.

Heritage

8.87 The Planning (Listed Buildings and Conservation Areas) Act 1990 requires (at section 66) with respect to listed buildings, that special regard is paid to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Local Plan Policy SP4 requires developments to respect and enhance heritage assets. Policy DM18 of the Local Plan permits development affecting heritage assets where the significance of the asset is preserved or enhanced. Policy DM18.7 states that substantial weight will be given to conserving and enhancing landscape features or planting that makes a positive contribution to the special historic character and original layout of Registered and Locally Listed Historic Parks and Gardens.

8.88 The entire school site is a Locally Listed Historic Park and Garden. The Main Lodge of the school (approximately 100m to the north of the junior school site separated by woodland) and part of the main school building (within the main school complex, almost 200m to the south west of the junior school site) are on the Council's Local List of buildings of Architectural or Historic Value. Old Ballards Cottage to the far south of the school campus is a Grade II statutorily listed building (over 300m from the Junior School site). The existing Junior School complex itself contains no buildings of historic significance.

8.89 The applicant has submitted a Historic Environment Record (dated August 2023) that thoroughly describes the existing assets of historic interest across the entire school

site. Given that the closest buildings of historic merit are well separated from the proposed development site, in terms of distances and by woodland and existing built form, it is considered that the significance of the surrounding heritage assets would be preserved by the proposed development and the nature of the proposal (replacement building in the same use) would have no impact on the functionality of these structures.

8.90 In terms of impact on the Locally Listed Historic Park and Garden, the woodland context and coverage preserves the plantation character of Ballards Estate and its associated assets. The majority of the proposed development reuses the site of the existing 1960s Junior School, within the extant elements of the 19th century estate and its heritage assets, without altering their interrelationship or their significance.

8.91 The proposal will lead to the removal of 3 trees however will also see extensive new woodland planting and landscaping provided. Further details with regard to landscaping and trees are fully discussed in the section below. As such, the proposals are not considered to have any adverse impact on the setting of the Locally Listed Historic Park and Garden.

8.92 The wider school campus lies within Addington Hills Tier II Archaeological Priority Area. A desk-based Archaeological Assessment has been submitted. Historic England Greater London Archaeological Advisory Service has assessed the submitted information and concluded that there is a discernible archaeological potential. The proposal could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. A two-stage archaeological condition would provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

Impact on Sports Pitches

8.93 To the east of the Junior School is an open space known as the ‘Paddock’. The space is used for informal play and occasionally overflow car parking. The area has an area of 3,413sqm. Due to the positioning of the replacement school and associated landscaping and access, approximately 505sqm of the paddock will be lost along the western edge.

8.94 Paragraph 99 of the NPPF (2023) states that existing open space, sports or recreational buildings and land, including playing fields, should not be built on unless:

a) An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
b) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
c) The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

8.95 Sport England is a statutory consultee if any proposal affects any part of a playing field. Sport England’s Playing Fields Policy (updated Dec 2021) says that Sport England will oppose the granting of planning permission for any development which would lead to the loss, or would prejudice the use of all or any part of a playing field or land which has been used as a playing field and remains undeveloped, unless the development as a whole meets with one or more of five specific excepts as outlined in the policy.

8.96 The Paddock has accommodated an under sized 7v7 junior football pitch delineated by mobile goal posts. The area of playing field remaining after the proposed development would be capable of accommodating a formally marked out FA compliant 5v5 football pitch. This is therefore a net loss of playing field and capacity on this part of the school site.

8.97 However, the redevelopment of the school buildings would release another part of the application site to provide a new sport lit Multi Use Games Area of 725 sqm to Sport England design guidelines. The proposed MUGA will provide an overall increase in outdoor sports area of 220sqm that will be made available to the wider community outside of school hours. Internally, the existing single height gym would be replaced by a double height space of slightly greater floor area.

8.98 Sport England concludes that the proposal broadly meets exception 5 of their Playing Field Policy that is, '*The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field*.' The assessment is subject to the new MUGA and grass football pitch being secured by condition. Sport England have also requested a condition requiring a community use agreement to be prepared in consultation with Sport England.

Trees, landscaping and biodiversity

Trees

8.99 The whole of the Royal Russell Campus is a Locally Listed Historic Park and Garden. The site largely comprises woodland, and extensive areas of woodland are located directly to the north and west of the Junior School area. The site is subject to 2no. Tree Preservation Orders (TPO 27, 1970 and 27, 2014), however neither relate to trees which are close to the Junior School site.

8.100 In order to facilitate the development, 3no. trees have been identified for removal – Trees T1 (C.2), T10 & T11 (B.2). The category B trees are self-seeded sycamores. T10 is required to be removed to accommodate the new building. T11 is required to be removed to create a compliant access to the school building in terms of gradient (i.e. as a result of required level changes). The applicant explored options to relocate the trees, however it was considered that the challenge and cost of doing so (by reason of their size and chances of survival) would be better spent in providing new trees to mitigate their removal.

8.101 The school has expressed that they will explore ways in which the timber from the trees can be re-used on site, for example through the creation of artwork or for habitat creation.

8.102 The tree survey recommends a further 5 trees for removal due to declining health or because they are already dead. These are not to be removed to facilitate the development, but because they are in ill health and are considered to pose a risk, and would have been removed regardless in accordance with good arboricultural practice.

Figure 18: Proposed Tree Removals

8.103 In terms of mitigation a total of 175 new trees will be planted on site and over 2,500sq of woodland proposed to the western edge of the site. The proposed tree species are predominately native and selected for their robustness to site conditions, extended seasonal variety and their ability to quickly give a sense of presence and structure to the landscape. As well as this, careful species selection will allow opportunity to harvest materials for craft making e.g. willow, hazel or chestnut coppicing. Within the woodland, wildflower seeding is also proposed.

8.104 The Tree Officer has commented that the removal of the trees is vastly outweighed by the proposed replanting of trees once the development is completed.

8.105 Existing trees on site will be protected during construction. Details within the Arboricultural report and Tree Protection Plan will be secured by condition. Site monitoring reports will be required to be provided by condition to ensure that the local planning authority is kept aware of ongoing protection and progress at the site.

Landscaping

8.106 The existing external play areas are predominantly hardstanding. A notable positive of the proposal is that there is scope to provide significant enhanced landscaping in and around the Junior School site. This is aided by the more compact form of the proposed building in comparison to the existing built form.

8.107 The layout of the proposed building, with the main spinal circulation route presenting as a bridge between the front and rear element, allows for landscaping and play areas to flow between and around the building. The main playground area sits to the rear of the building and the new MUGA to the west, and all external areas are surrounded by greenery. The planting strategy includes extensive tree planting, ornamental planting and native wildflower planting.

8.108 London Plan Policy G5 states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site. The Urban Greening factor (UGF) is a tool to evaluate the quality and quantity of urban greening. The UGF of the existing Junior School is 0.16. This scheme should achieve a minimum UGF target score of 0.3. The landscape proposals achieve a considerable uplift with an UGF 0.88, significantly exceeding the minimum value of 0.3.

8.109 The woodland setting of the Junior School will be preserved and enhanced by the proposals. The scheme successfully integrates the new building into its green woodland context through the creation of learning environments set in nature, setting the building back from the entrance road which provides opportunity to plant in front of the building, and surrounding the building within planted margins and climbing plants.

Figure 19: Proposed Planting Strategy

Biodiversity

8.110 Much of the school campus is within Ballards Plantation Site of Importance for Nature Conservation (SINC). The junior school site itself is not within this designation however the land surrounding the site is. The site immediately abuts woodland and the site itself contains mature trees. An Ecological Appraisal has been undertaken for the site which includes an Extended Phase 1 Habitat Survey and bat surveys including ground level assessment and bat roost assessment of buildings within the site.

8.111 Royal Russell School and Ballards Plantation SINC is designated for its woodland and grassland habitats. In terms of the assessment and impact of the development on the SINC, the GLA considered that the initially submitted appraisal did not go far enough assess the potential impacts. The applicant subsequently submitted an updated Ecological Appraisal (dated October 2023) which provides additional assessment. The appraisal notes that due to the close proximity of this designated site,

there is potential for impacts to occur from proposals in the absence of mitigation, including from root compaction, accidental damage and contamination and indirect impacts of noise, shading and lighting during construction.

8.112 The appraisal states that the woodland habitat and SINC will be retained and protected during construction to avoid any adverse impacts, via the implementation of best practice construction measures including; secure storage and safe disposal of any materials to prevent accidental contamination; measures to prevent/reduce dust; control of surface water runoff; measures to minimise vibration and noise; lighting directed away from the woodland edge. Trees will be protected. The footprint of the proposal, similar in location to the existing school buildings will not cause any additional shading onto the adjacent SINC.

8.113 In terms of habitat, the site is comprised of hardstanding, buildings, amenity grassland, broadleaved woodland, and scattered trees. All the habitats except hedgerows and scattered trees are of low to negligible ecological value. The proposed development will be focused within these lower value areas within the site. The hedgerows and scattered trees are considered to be of higher ecological value given their role of provision of habitat for species to shelter and forage. The proposals will result in the loss of some amenity grassland and 3 scattered trees. To mitigate, a significant area of tree planting is proposed to the western part of the site.

8.114 In terms of protected/notable species:

- Bats – The majority of scattered trees within the site are identified as having negligible potential to support roosting bats. One tree in the north east of the site is identified as having low bat roost potential. The junior school building itself is identified as having low bat roost potential. No roosts were recorded during the emergence survey and no bat activity was noted. The woodland to the north and east one. of the site makes more suitable foraging, commuting and roosting habitats for bats. Mitigation is suggested in terms of the removal of the trees on site, and in terms of any proposed lighting within the site.

- Badgers – No badger setts were recorded within the site, however within the woodland 60m to the north of the site, signs of badger were identified. The site provides areas of amenity and neutral grassland in which badgers could forage. Given that badgers are known to be within the area and the mobility of the species, further survey work is required. Prior to the commencement of any works, an updated inspection must be undertaken to ensure that no badgers have moved to the site and established setts. If new setts are identified, depending on location, a Natural England licence may be required.

- Great Crested Newts (GCN) - No ponds are recorded within the application site and as such the site is not considered suitable to support breeding habitat for GCN. However, within the wider school grounds a low population GCN have previously been recorded in a pond 100m to the west of the Junior School building, during surveys in 2018. Adjacent amenity grassland could provide suitable terrestrial habitat for foraging. The pond is separated from the from the site by hardstanding, buildings, fencing and amenity grassland and as such it is unlikely that GCN would be transiting through the site. To ensure no impacts occur in relation to GCN, precautionary mitigation measures are proposed in the form of gradual habitat clearance, search of habitat features under ecological supervision, installation of exclusion fencing to ensure GCN do not transit through the site during construction.

- Reptiles – The site supports little suitable habitat for reptiles, including a small area of longer sward amenity grassland which provide opportunities for reptiles to bask and forage. Precautionary mitigation approach recommended as per for GCN above.

- Birds – The site supports suitable habitat for common bird species to nest within the scattered trees and shrubs. There was no evidence of nesting birds identified within the survey. Mitigation is recommended with regard to timing of tree/habitat removal.

- Invertebrates – The site includes small area of suitable habitat for invertebrates such as the stag beetle, this includes woodland habitat, hedgerows and log pile within the playground. Mitigation includes destructive search of features under ecological supervision and any species found relocated to suitable habitat within the vicinity. Like for like replacement of ground features such as log piles.

- Hedgehogs - The site provides a small area of suitable habitat for hedgehogs to forage including neutral grassland and hedgerows.

8.115 The Council's ecological consultant has reviewed the submitted information and is satisfied that with appropriate mitigation measures secured by condition, the development can be made acceptable in terms of impact on designated sites, protected and Priority species and habitats. The mitigation measures identified in the Ecological Appraisal (and as outlined above) will be secured by condition. A Construction Environment Management Plan (CEMP) will be required to demonstrate how species will be protected throughout the construction period and a wildlife friendly lighting scheme required to be provided.

8.116 Our ecologist has requested the removal of some London Invasive Species from the site which is necessary in order to conserve and enhance protected and Priority species. It will be ensured that the full landscaping proposals (as required by condition) will incorporate this request.

8.117 The NPPF and London Plan Policy G6 require that any development seeks to provide Biodiversity Net Gain (BNG). The site comprises of relatively low value habitats, with a few high value features, but there is opportunity to create new habitats and enhance areas of existing higher ecological value through habitat creation and management measures. A technical BNG Assessment (dated August 2023) has been undertaken by the applicant. The proposals are expected to result in a BNG of 156.7% for habitats (a net gain of 4.20 habitat units in the form of grassland, woodland, individual trees, shrubs, rain gardens) and 13.5% of hedgerows (a net gain of 0.15 hedgerow units), far exceeding the target of 10%. The Ecological Appraisal also suggests that log/brash piles and bat and bird boxes can be installed. Full details of a biodiversity enhancement strategy and biodiversity gain plan will be secured by condition.

Functionality of the new building

8.118 The applicants design team have worked closely with the school to develop a building that meets their functional needs and adhere to current required standards and regulations.

8.119 The proposed lower ground floor plan of the Junior School is divided into two distinct volumes. The northernmost block is sited amongst the woodland and accommodates the Nursery and Reception classrooms with dedicated external areas and entrance. The landscape is intended to flow around the building to provide a fluid teaching environment with direct access from the classrooms to the external play areas. The main circulation spine takes the form of a bridge above, providing covered access to the remainder of the school.

8.120 To the south, the years 1 and 2 classrooms are arranged as a Key Stage 1 cluster and also have direct access to dedicated KS1 outdoor play areas. The music classroom and gymnasium are also located on this level where it benefits from direct external access to exterior play space and sport court.

8.121 The ground floor is accessed from a clearly defined single-story entrance which leads to the school's main circulation spine, following the topography of the site and flowing down to the lower ground floor and exterior play space via a gathering staircase. Views down into the gymnasium on the level below and breaks between the building volumes along the bridge offer glimpses of the surrounding landscape. The main visitor reception, administration offices and meeting room are located to the front of the school, in close proximity to the main entrance, while Key Stage 2 teaching clusters (years 3-4 and years 5-6) to the east and north benefit from having an outlook into the surrounding woodland. To the west, the dining hall opens out into an exterior dining space and the playground beyond.

8.122 An open stair flows up and over the gathering stair and provides access from the main circulation spine up to the first floor. The library is located at the heart of this upper level, with expansive views towards the east. Also located on this floor are the specialist science lab and art / design technology studio, as well as the staff common room with a roof terrace overlooking the playground.

Figure 20: Proposed floor plans – Lower ground, ground and first

8.123 Externally, playspaces for the nursery, reception and KS1 year groups are located directly outside of the classrooms. Level changes, low level fencing and planting will separate early years provision from the older year groups. Spaces will be provided to

enable external dining, teaching areas and amphitheatres. A MUGA is proposed which will provide required facilities for formal sports to Sport England standards. The site will maintain its existing good links to the existing forest school to the west and adventure play area to the north.

8.124 In terms of access, direct visitor and staff access will be provided via the main entrance to the front. A new footpath via a ramped woodland walk is proposed to be provided to the nursery and reception area. Separate access is provided to the western side of the building for Key Stage 1 and 2 pupils via a new asphalt access road. Segregated access is provided for deliveries and servicing to the western end of the frontage. Emergency vehicle access is provided to the west side of the building.

8.125 Inclusive design – London Plan Policy S3 seeks to ensure that education facilities are accessible and inclusive for a range of users, including disabled people, by adopting an inclusive design approach, this includes internal and outdoor space. The application submission states that the proposal is fully inclusive with all ramps meeting the relevant regulations. Whilst there are some areas within the proposal that are stepped, there are also alternative ramps to provide full accessibility. Two lifts are provided within the building making all facilities fully accessible.

Impact on neighbouring residential amenity

8.126 Given that the proposed development is to be situated on the same site as the existing school, and the significant separation distances to adjacent neighbouring properties and woodland coverage, the proposals will not cause any harm to the amenity of any residential property way of causing any loss of light, outlook or privacy. No additional environmental impacts will be created e.g. noise or light pollution in comparison to the current situation. The scheme proposes the potential for 20 more pupils to be accommodated at the school and when considering the current 1,150 pupil capacity across the whole school, the increase is not expected to create any undue cumulative impacts.

8.127 All representations that have been made by adjacent residents are with regard to school access from Hollingsworth Road. This issue is discussed in the section 'Highway and Transportation matters' below.

Highway and Transportation matters

8.128 The site is predominantly accessed from the main Coombe Lane entrance point. This entrance provides access to all on-site parking facilities, the main school drop-off/pick-up point and provides access for all servicing and deliveries of the site. There is also a pedestrian access from Hollingsworth Road, a residential cul-de-sac to the southern side of the school campus, however this access gate, whilst on land in the ownership of the school, is located outside of the red line of the application site and is located approximately 300m (as the crow flies), from the edge of the application site.

8.129 At the main vehicular entrance point, the site has a Public Transport Accessibility Level (PTAL) of 2, Coombe Lane tram stop is approximately 160m from the school entrance (3 minute walk). This tram runs to New Addington and Wimbledon (via Croydon).

8.130 The proposal will increase the capacity of the Junior School from 380 pupils to 400 pupils, with no increase in staff numbers. The existing school as a whole on the Royal Russell campus has approximately 1,150 pupils, and 350 members of staff.

Access and car parking

8.131 There are no proposed changes to the vehicle access arrangements of the site or to the car park opposite the replacement Junior School. The replacement school building will have two main pedestrian entrances located at ground floor and lower Ground floor level with step-free access provided for both access points and throughout the building. A new footway will be constructed along the Junior School's frontage and zebra crossings will be provided to facilitate access between the visitor/parent car park and the school.

8.132 In terms of the safety of the existing Coombe Lane access, the Transport Statement (TS) identifies that one accident has occurred at the access from 2017 to date. The TS finds that the uplift in capacity of 20 pupils could generate an additional 15 car trips to the site. In reality these would be staggered when taking into account breakfast and after school clubs. However as a worst-case scenario, the increase of 20 extra car trips represents a 2.4% increase at the Coombe Road junction during the AM peak and 2.5% increase during the PM peak. It is not considered that this marginal increase in pupils will cause any significant additional impacts in terms of the highway safety of the access or capacity issues on the surrounding highway network.

8.133 The existing car parking arrangements at the school are not proposed to be changed as a result of the proposal. The car park is highly managed by school staff during the morning drop-off and afternoon/evening pick-up periods. The addition of 20 students will fall within the daily fluctuations of the use of the car park.

8.134 Transport for London (TfL) have commented that the existing parking arrangements do not align with London Plan policies which support Mayoral mode shift objectives. The amount of parking overprovides in comparison to London Plan maximum standards. As well as this, the school does not accord with London Plan policy requirements in terms of amount of blue badge bays provided across the site. Whilst this is noted, officers recognise that this is an existing situation and that the proposed development in itself will have a minimal impact in regard to the parking demands at the site. Reduction in reliance of the private car is a policy requirement and officers consider that this should be addressed as part of wider on-going measures captured as part of the School Travel Plan (see further comment below). Officers do not consider the existing overprovision of car parking across the site to be a justifiable reason for refusal of the current application.

Access via the Hollingsworth Road entrance

8.135 There is an existing pedestrian access into the wider school site from Hollingsworth Road to the south of the school campus. The applicant states that this access has been in situ since the school was founded at the site in 1924, however neighbours contend that the access has been in place since 1969 and not always used for pupil access. Nevertheless, this access point is historic and in situ. Numerous objections have been received with regard to the use of this entrance for drop-offs and pick-ups which neighbours have stated cause a significant highway and personal nuisance for residents of the cul-de-sac. It must be noted that this is an existing issue and falls outside of the application site for this proposal. It is considered that it is not directly

related to the current proposal, as set out in the paragraphs below. The existence of the access was omitted from the initially submitted transport information.

8.136 As a response to the objections that have been received, the applicant has provided supplementary transport information. The proposed development will reprovide an existing established education facility and the development will increase student capacity by 20 pupils. No change to staff numbers is proposed. Based on a recent travel survey within the junior school, the Transport Statement calculates that the effect of 20 additional children associated with the replacement junior school would be 14 additional car trips, 1 child in a shared car journey, 1 journey via school bus, 1 child walking, 2 by tram and 1 additional park-and-stride trip.

8.137 Given that drop-off for most of the junior school children involves a grown up parking and waiting within the school grounds, most of the resultant transport activity is focused on the school's main car park. The junior school is located on the opposite side of the school grounds relative to the Hollingsworth Road gate. It is probable that the Hollingsworth Road gate is predominantly used by older students who are capable of walking to the school unaccompanied.

8.138 Nevertheless, the applicant has identified that 'park-and-stride' represents approximately 3% of junior school trips which is the equivalent of 11-12 existing vehicles, which may form part of the existing vehicle activity observed by residents on Hollingsworth Road. For the additional 20 students, an increase in 1 park-and-stride trip is expected, which could be from Hollingsworth Road.

8.139 The school acknowledges the concerns raised by residents of Hollingsworth Road and as a response is seeking to improve conditions where practical to do so. As an immediate response, school staff have patrolled the area and have spoken with parents asking them not to park on the road, leaflets have been handed out to parents and to local residents. The school has sent email correspondence to parents discouraging use of Hollingsworth Road and outlined traffic calming measures to help streamline the drop off process. The school Travel Plan has also been updated as part of the application to aim to reduce car usage, full details of which are outlined below.

8.140 Reconsultation was undertaken following the supplementary information provided by the applicant and it is clear that residents do not find the applicants response satisfactory.

8.141 Whilst representations have called for the gate to be closed, it is noted that there are pupils and staff who live nearby and legitimately walk to the gate. Closing the gate would potentially mean that those people would drive instead, which is fully discouraged. Further, the gate needs to remain in place for emergency access as well as grounds maintenance.

8.142 Whilst the concerns raised are fully acknowledged by the local planning authority, the issue raised must be considered in the context of the remit of the development proposed. Given that this is an existing matter, and as outlined above, the proposals themselves will have a minimal impact in this regard, officers do not consider it prudent to impose punitive measures to restrict access via this gate as part of the determination of this application. It is noted that more recently, the school has taken the decision to close the school gate in response to the concerns raised by residents. However, it is considered that it is outside of the remit of this current application to secure the closure of the gate by condition. This is because such a condition would not meet the tests

outlined in paragraph 56 of the NPPF and national Planning Practice Guidance. It is proposed that conditions and planning obligations be added requiring a school travel plan (and its monitoring) and a construction logistics plan and that this is sufficient to control the impacts of the specific development proposed in this application.

Cycle parking

8.143 London Plan Policy T5 'cycling' describes that development proposals should help to remove the barriers to cycling and create a healthy environment in which people choose to cycle. Cycle standards for school use is 1 space per 8 FTE staff and 1 space per 8 students. There should also be 1 short-stay space per 100 students. This would equate to 50 bays for the 400 pupils at the Junior School and 8 bays for the 62 members of staff. Short stay visitor bays should also be provided. TfL have commented that cycle parking facilities in line with London Plan standards should be provided across the site, in both number and to provide accessible bays.

8.144 There are existing cycle parking spaces placed around the school site. The TS says that there is a low uptake of spaces and these are predominantly used by school staff. There are currently 30 scooter/bicycle space adjacent to the existing junior school and 28 spaces provided at the boys and girls secondary boarding houses. Photographic evidence shows that only 2 cycles occupy these spaces on a typical weekday. Scooters have been found to be used more (9 scooters).

8.145 There are no cycle lanes on Coombe Lane and the road has a high volume of traffic. The school is located at the top of a hill. In this location, cycling is not common or particularly recommended for students.

8.146 Given the above, it is not considered in this instance and at this time, that the provision of extensive cycle parking facilities are a worthwhile measure to secure sustainable transport improvements. It is noted that in the School Travel Plan (discussed below), extra cycle parking bays will be provided if demand increases.

8.147 In response to GLA/TfL comments, the applicant has amended the plans to include the provision of 10 cycle bays within the Junior School grounds, to demonstrate that the school is committed to improving sustainable transport options. A new covered scooter enclosure is also proposed to be provided for the Junior School pupils. This is considered to be sufficient and full details of the cycle and scooter parking enclosures will be secured by condition.

Sustainable transport measures

8.148 The TS includes a survey of existing travel habits of the junior school pupils. The results of the travel survey demonstrate that around 72% of junior school children are brought to school by car. The survey also highlights that a notable number of parents would prefer to use more sustainable means of travel.

8.149 Given that a high percentage of pupils do arrive by car, measures to encourage more sustainable means are sought.

8.150 The TS states that the school already operates a comprehensive Travel Plan which applies to the junior and senior schools and travel surveys are undertaken regularly. A new Travel Plan has been developed which builds on the existing Travel Plan. The document aims to encourage staff and students to travel by sustainable modes and to

reduce the use of private car to 61% by 2027. Outlined measures to encourage this include:

- Promoting the uptake of the school bus
- Educating pupils with regard to road safety
- Educating pupils on sustainability – sustainable transport and the effect of carbon on the environment as part of the curriculum,
- Promotion of travel information to pupils, parents and staff
- Personalised travel planning service for all staff
- Walking to school initiatives including challenges and events, encouragement of park and stride
- Cycle training courses
- Cycle schemes to encourage staff to travel by bike.
- Cycle parking stands will be increased if demand increases

8.151 Given the significant reliance on the private car, the Travel Plan is an essential tool going forward to achieve a reduction in car use. It is considered that the Travel Plan can go further and can provide some more concrete targets to ensure that car use is reduced. These improvements will be secured via legal agreement in conjunction with transport colleagues. The legal agreement will also secure the monitoring of the Travel Plan for a 5 year period.

Deliveries and servicing

8.152 Deliveries to the site will be undertaken in line with existing arrangements at the site. Drivers park at the delivery point which is signposted within the site and all deliveries are received at the main reception. It is not anticipated that the replacement Junior School will generate additional demand for deliveries.

8.153 Storage for general waste and recycling will be provided to the western side of the new building. As per the existing arrangement, waste from the junior school will be collected each day by the facilities team, and transferred to a central location for the whole site. Waste for the whole school is then collected from this central location outside of usual school hours to ensure the health and safety of pupils. There will be no change proposed to this strategy. An Operational Waste Management Plan has been provided outlining the above and will be secured by condition on any permission granted.

8.154 The submitted Delivery & Servicing Plan outlines initiatives to minimise the impact of delivery and servicing activities on the local road network such as: seeking sustainable suppliers and alternative modes of transport for freight such as electric vehicles or cargo bikes, advising drivers to switch off engines when the vehicle is stationary, encouraging staff to not arrange deliveries to the school, encouraging boarding students to reduce the number of online orders (e.g. by grouping items to be delivered etc). The details within the plan will be secured by condition on any permission granted.

8.155 TfL have commented that they expect all deliveries to avoid the peak hours of 08:00 – 10:00 and 16:00 – 18:00. The applicant has updated the Delivery and Servicing Plan to limit deliveries during the two main peak hours (8-9am and 3-4pm), as these are the actual peaks associated with the Junior School. The Delivery and Servicing Plan states that there are currently on average 18 deliveries per day to the school campus which is insignificant against the existing traffic flow on Coombe Road and there are currently no restrictions on hours of deliveries to the site. The scheme is not expected to

increase the number of deliveries in comparison to the existing situation and as such it is not considered appropriate to insist on such restrictions as a result of this application.

8.156 An Outline Construction Logistics Plan (CLP) has been submitted. It is proposed that all construction vehicles will stop within a purposely designated loading area on-site in the Paddock adjacent to the Junior School. The existing gate to the Paddock is proposed to be widened and a new egress gate created. The grass will be laid with an appropriate surface to allow vehicle access. Both traffic marshals and banksmen will be employed and will manage pedestrian and vehicular movement around the site. Deliveries are proposed to take place between 9:30am and 2:30pm. A commitment has been made to prevent multiple deliveries from stacking up outside the site.

8.157 The Council's Highways Team finds the details within the CLP acceptable. The Environmental Health Team initially requested further information with regard to control of noise and dust and in terms of security arrangements. This was subsequently provided and the Environmental Health Team find the information acceptable. TfL have also required additional information with regard to; the route taken by construction vehicles to gauge impact on the TLRN and surrounding borough highways, clarification on the number of construction workers due on site and parking for them (which should reflect the mode share set out in London Plan Policy T1), number of vehicle movements, loading position, site hoarding and traffic management. In light of TfL comments, as well as comments made by residents of Hollingsworth Road, an updated CLP will be requested by condition.

Environmental matters

Building Performance

8.158 All major development should be net zero-carbon in accordance with the London Plan energy hierarchy of Be Lean; Be Clean; Be Green and Be Seen. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required and if zero carbon is not met a cash in lieu contribution is required. Major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions.

8.159 The submitted Energy Strategy has been developed in line with the London Plan's energy hierarchy. The proposed development is currently predicting a 58% carbon dioxide emissions reduction over the target Part L 2021 of the Building Regulations (based on the approach, information, analysis, and contents reported in the GLA Guidance on preparing energy assessments), through the following measures:

Be Lean - Demand Reduction - Using less energy and utilising passive sustainable design measures (energy efficiency delivering up to a 15% for the non-domestic carbon improvement on the building regulations). Glazing will be used to optimise the control of solar gain and glazing areas optimised to increase the benefits from natural daylighting, therefore reducing the need for electric lighting and minimising heat loss from the buildings. Building fabric will achieve high thermal performance and the development will be designed to a high air tightness standard.

Be Clean - Heating infrastructure – An investigation using the London Heat Map was carried out to identify the existing and future district heating networks in the vicinity of

the site. The London Heat Map indicated that there are no existing or planned district heating networks in the vicinity of the site. The site is situated on the border of the heat network priority area, and it is unlikely that any future district heating connections will be considered.

With regard to this matter, the GLA have asked for further exploration of District Heat Network (DHN) potential and to futureproof for connection to future DHN via s106. In response, the Council's Energy Officer has commented that the location is one of very low heat demand density with significant green space surrounding it. It is therefore a very unsuitable area for any heat network development and there would be no low-carbon benefit in requiring the development to be 'ready to connect' to a future network.

Be Green - Utilising renewable energy or low carbon technologies where possible to further reduce carbon emissions (energy efficiency delivering a 42% improvement on the building regulations). The Energy Strategy assesses low and zero carbon technologies and concludes that Air Source Heat Pumps (ASHP) and Photovoltaic panels (PVs) are the most suitable renewable energy technology for the school. Photovoltaic panels (231no.) will be installed to the roof area supplying the building with electricity and the area has been maximised as far as possible to account for shading and plant equipment. The number of roof panels has been increased following GLA comments which required demonstration that renewable energy has been maximised including roof layouts showing extent of PV provision. The provision of these photovoltaic panels can be controlled by condition.

Be Seen - Monitor and record the actual energy and carbon performance of buildings in comparison to estimated design figures.

8.160 To achieve the zero-carbon standard, an off-set payment will be made for the outstanding regulated CO2 emissions based on the zero-carbon shortfall payment off-set price of £95 per tonne x 30 years, amounting to £21,710. This will be secured by legal agreement, along with standard "Be Seen" clauses (requiring post-construction monitoring).

8.161 Overheating and Cooling – Policy 5.9 of the London Plan requires major developments to reduce potential overheating and reliance on air conditioning systems. Mechanical ventilation will utilise heat recovery in the winter and mid-season months to increase the delivery efficiency of heating. The proposal will not be serviced with full air conditioning, but will be provided with the adequate mechanical ventilation with peak temperature lopping to achieve thermal comfort which will be modelled and tested through dynamic thermal simulation. It is recommended that openable windows are provided in every classroom for natural ventilation. The incorporation of brise soleil's will reduce solar gain and the need for artificial cooling. Externally, the landscaping, with extensive tree planting will reduce any heat island effect and provide natural shading and cooling.

As requested by the GLA, an overheating analysis has been undertaken. The assessment uses dynamic thermal modelling software to estimate operative temperate and calculate predicted occupant comfort levels. The assessment demonstrates that the proposed development is almost fully compliant with the performance standards for the avoidance of an overheating risk. However, it is noted that 2 x office/support staff spaces are at risk of overheating and as such, mitigate is required to be provided

at the next design stage to demonstrate how the occupants can minimise the risk of overheating in the future. This shall be secured by condition.

8.162 London Plan Policy SI2 (F) requires applications that are referable to the Mayor of London, to calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment (WLC) and demonstrate action taken to reduce life-cycle carbon emissions. A Whole Life Carbon Statement has been submitted.

8.163 As originally submitted, the Whole Life Carbon Statement calculations found that the development did not perform within the GLA benchmarks and the applicant proposed to commit to further assessment during later stage design development in order to reduce the WLC of the development further by reviewing the proposed substructure and structural frame which have high concrete content and the required external works and landscaping.

8.164 In their Stage 1 comments, the GLA noted that the WLC assessment did not comply with London Plan Policy SI2 and detailed comments were provided to the applicant in relation to the divergencies from their requirements. Notably, the assessment method and some of the data used did not conform with guidance and acceptable sources, and further information was required with regard to several factors including the divergence from the WLC benchmark, WLC reductions and material types and quantities.

8.165 The applicant has produced an updated Whole Life Carbon Statement in response to the GLA's comments. New calculations and remodelling has been undertaken, as well as suggesting further actions to improve emissions. The updated data shows that the results fall within the GLA's WLC benchmarks, but the development does not perform within the GLA's aspirational benchmarks. As previously commented, the applicant proposes to commit to further assessment during later stage design development by reviewing the proposed substructure and structural frame which have high concrete content and the required external works and landscaping. This updated assessment has been passed onto the GLA who are expected to provide further review as part of their Stage 2 (London Mayor's decision-making stage).

8.166 As required by the GLA, a condition will be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions.

8.167 London Plan Policy D3 requires development proposals to integrate circular economy principles as part of the design process. Policy SI7 requires applications that are referable to the Mayor of London, to promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement has been submitted.

8.168 In their Stage 1 comments, the GLA noted that the Circular Economy Statement as submitted initially with the application, referred to previous guidance and principles and that a revised statement was needed in line with current adopted London Plan Guidance. The applicant has responded to the GLA's comments and has undertaken a new assessment based on the current guidance.

8.169 The selected strategy is 'New Building' and 'Demolish and Recycle' whereby traditional demolition will be undertaken, with elements and materials processed into new elements, materials and objects for use on the site or on another site. Given the structural un-soundness of the existing building, refurbishment and repurpose are not feasible options.

8.170 In terms of the new building, the following principles have been addressed:

- The building is designed to have a long life on its current site
- Parts of the proposed building can be disassembled and relocated elsewhere in the future
- The new building design will be built for component reuse at end-of-life. The steel frame can be extracted and reused, tiles and floor finishes will be durable and reman in good condition or reuse, any concrete elements can be recycled.
- The building and rooms within it will be suitably sized for adaptability and flexibility

8.171 The proposed development has been designed by incorporating key commitments to the circular economy, considering the life cycle of all elements:

- Demolition materials to be crushed and re-used on site where feasible;
- Minimisation of water and energy use during construction through management procedures and monitoring; and in-use through low carbon design and specification of energy and water efficient equipment;
- Optimising the concrete design to maximise recycled content, and to reduce required cement and water content;
- Materials selected for longevity and durability as well as recoverability and recyclability at end of life;
- Consideration of off-site prefabrication of a number of elements to reduce construction and material waste;
- Efficient segregation of waste streams, both during construction and in-use, through site waste management plans, and operation waste management plans, with targets set to divert waste from landfill in line with policy;
- The Operational Waste Management Plan has been updated to include community-led waste minimisation measures for school staff and students.

8.172 This amended assessment has been passed onto the GLA who are expected to provide further review as part of their Stage 2 (London Mayor's decision-making stage).

8.173 The GLA also require a condition to be secured requiring the applicant to submit a post-construction report.

Contaminated Land

8.174 Anecdotal evidence suggested that the area to the west of the site comprised landfill material deposited during the 1960s. Given the history of the site, a detailed Ground Investigation Report has been undertaken. This has been assessed by the Council's Environmental Consultants. The consultant is satisfied with the desk study and the subsequent intrusive site investigation that has been undertaken. As the investigation found the presence of potential pollutant linkages, a remediation strategy is required to ensure that the site is rendered suitable for its use. This will be required by condition.

Flood Risk and sustainable drainage

8.175 The site is largely at low risk of surface water flooding, however there are areas around the junior school (including the area where the new building is proposed) that are at 1 in 1000 year risk. The site has limited potential for ground water flooding to occur.

8.176 Local Plan Policy DM25 and London Plan Policy SI 13 both require sustainable drainage systems to be used in all development. Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the drainage hierarchy. Drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.

8.177 A Flood Risk Assessment and SuDS Strategy Report has been submitted. The site is underlain by sand and gravel with ground investigations confirming that surface water run-off can be disposed of to the ground via infiltration.

8.178 Surface water will therefore drain directly to the ground utilising permeable paving (pedestrian paving, play surfaces and MUGA), rain gardens and filter drains. The building will be primarily drained via a soakaway located in the playground area. There are also opportunities for rainwater harvesting however this is not proposed to be used for attenuation.

8.179 The rain gardens are incorporated into the landscape strategy and have been designed to protect buildings and learning spaces by slowing down and managing rainwater flows. These include dry rain gardens located either site of the early years building wing which will operate as play features including boulders and gravel gardens, and vegetated raingardens within play and outdoor classroom spaces. In addition, surfacing within the play spaces will be permeable.

8.180 The Lead Local Flood Authority has reviewed the submitted information. As originally submitted, whilst there was no objection to the principle of the proposed drainage measures, the submitted FRA strategy presented a general approach to surface water management, however some further technical information was required to fully demonstrate compliance with LLFA's flood risk criteria. The applicant subsequently submitted additional information and the LLFA have confirmed that they have no objection as the application now meets most of the LLFA requirements, however some clarifications and additional information are still required to demonstrate that the proposals are fully complaint. These can be required by the inclusion of a pre-commencement condition.

8.181 The GLA Stage 1 report made comments on the submitted Flood Risk Assessment and SuDS Strategy Report, noting that further information was required in respect of several aspects (e.g. clarification on site area, risk of flooding from all sources, the use of rainwater harvesting, and requirement for further information on the below ground drainage layout). The applicant has submitted an amended report and response to the GLA's water memo. Officers are satisfied that the applicant has adequately addressed the GLA comments. The GLA will undertake further assessment as part of their Stage 2.

8.182 Given that the LLFA finds the information acceptable, no objection is raised in terms of the proposed drainage strategy, subject to the imposition of a condition.

Air Quality

8.183 The whole of Croydon Borough has been designated as an Air Quality Management Area (AQMA). London Plan Policy SI 1 and Local Plan Policy DM23 states that

development should seek opportunities to identify and delivery improvements to air quality. Development proposals must be Air Quality Neutral.

8.184 An Air Quality Assessment has been submitted. Potential impacts during the construction phase have been identified (e.g. release of dust and particulate matter) and this will be managed through good site practice and mitigation. The resultant impacts are this considered to be negligible.

8.185 Road dispersion modelling had been carried out to assess the suitability of the site for its proposed end use with regard to local air quality. The results indicate that predicted concentrations of relevant pollutants are well below relevant objectives. Future users would not be exposed to pollutant concentrations above objective levels and therefore the impact with regards to new exposure to air quality is therefore considered to be negligible.

8.186 The Environmental Health team advises that the development should follow the recommendations and mitigation measures within the Air Quality Assessment. This will be secured by condition.

8.187 The GLA Stage 1 has requested further information on Non-Road Mobile Machinery (NRMM). The applicant has commented that details of NRMM will not be fully known until a contractor is appointed. The Construction Logistics Plan condition will require details demonstrating compliance with the NRMM regulations 2015 to be submitted and approved. The GLA has also asked for confirmation as to whether the development has emergency generators, and if so, details of any emissions from this source should be screened and assessed if necessary. The applicant has confirmed that no emergency generators are proposed.

Noise

8.188 London Plan Policy D13 Agent of Change requires developments to be designed in a way that mitigates ad minimises existing and potential nuisances such as noise early in the design stage. Policy D14 requires proposed to manage noise so as to avoid significant adverse noise impacts on health and quality of life. This is mirrored in Policies SP6 and DM23 of the Local Plan.

8.189 The application is for a replacement junior school on the same site without any significant increase in the number of users of the site. There are no adjoining occupiers who would be sensitive to noise disturbance. A baseline noise survey was undertaken to inform the design process and it has been found that natural ventilation can be achieved (e.g. opening windows) without being affected by noise concerns and external amenity areas will achieve suitable noise levels. Plant equipment may require attenuation which will be fully addressed at further design stage when specific plant items have been selected. The Environmental Health team raises no concerns in this regard.

8.190 The applicant should observe the Council's Code of Practice 'Control of Pollution and Noise from Demolition and Construction Sites' which shall be added as an informative to any permission granted.

Light pollution

8.191 An External Lighting Assessment has been undertaken. This outlines specific design criteria that needs to be achieved in the design of external lighting including for roads,

student walkways/footpaths and the MUGA. The development will be lit by lampposts (of a luminance and distribution to ensure student safety) and footpaths will also be lit with low level bollards. The MUGA will be lit by LED floodlights on 12m high poles to ensure uniformity and reduce shadowing.

8.192 The External Lighting Assessment has also assessed biodiversity design considerations. This includes; avoiding lamps that emit high levels of UV, the luminaries will comprise integral reflectors, louvres, diffusers to control direction an spread of light, there will be minimal spread of upward light, low level bollards will prevent the formation of a 'light barrier'. Full details of external lighting to ensure there is no harm to wildlife shall be secured by condition.

Other planning matters

Fire safety

8.193 As required by London Plan Policy D12, in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety. Policy D5 seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. A Planning Fire Statement has been submitted. The statement includes details with regard to the structure of the building. A means of escape and evacuation strategy is provided and the building includes an evacuation lift. Details of the excavation assembly point are provided. The statement outlines passive and active fire safety measures. It also details means of access for the fire appliances.

8.194 The GLA is satisfied that the statement meets the requirements of Policy D12 and Policy D5 of the London Plan (2021). The Council's Building Control team have reviewed the submitted information and find the details satisfactory. A condition shall be imposed to ensure compliance with the submitted information.

Crime Prevention

8.195 The NPPF, London and Local Plan Policies seeks to create safe, secure and appropriately accessible environments where crime, disorder and fear of crime do not undermine the quality of environment. The applicant met with the Met Police Designing Out Crime Officer (DOCO) in advance of submission of the application whereby security measures were discussed and recommendations made, which mainly consist of internal security measures which will be incorporated through the detailed design stages of the construction. The DOCO has requested that the standard secured by design condition is imposed on any permission. The condition will make sure that the school is developed into a safe and secure environment for the children and staff.

Health Impact

8.196 London Plan Policy GG3 seeks to improve Londoner's health and reduce health inequalities and Croydon Local Plan Policy DM16 promotes the creation of healthy communities which encourage healthy behaviors and lifestyles. The applicant has submitted a Healthy Urban Planning Checklist.

8.197 The proposal will greatly improve existing teaching facilities and result in an increase in school places within the borough. The proposals will also improve the community use offering from the School, for example through use of the new Multi

Use Games Area, playing pitch and indoor facilities. The replacement School will be fully accessible for those with mobility issues.

8.198 The new building will be more energy efficient than the existing buildings on site and will utilise renewable energy technologies. Passive cooling techniques will be incorporated. The development will result in far better-quality open space for the pupils, greatly increased urban greening and biodiversity net gain. Sustainable drainage techniques will be used.

8.199 Active travel will be promoted through the school Travel Plan.

8.200 Construction impacts to health (e.g. dust, noise) will be minimised and managed through the Construction logistics Plan. A contribution towards local employment and training for the construction will be secured by S106 legal agreement.

8.201 Officers are satisfied that the proposal meets the requirements of the above-mentioned policies, by promoting healthy communities as far as possible.

Employment and training

8.202 As required by SP3.14 of the Croydon Local Plan and E11 of the London Plan, developers will be required to produce a Local Employment and Training Strategy (LETS) for the Construction Phase and/or End-use Phase as appropriate, outlining the approach they will take to delivering employment, training and apprenticeship outcomes and engagement with schools and education providers for the development.

8.203 In order to ensure that the benefits of the proposed development reach local residents who may be impacted directly or indirectly by the proposal's impacts, a skills, training and employment strategy (construction phase) will be secured through the S106 legal agreement. The legal agreement will secure contributions of £2,500 for each million pound or part thereof of the construction costs.

Conclusions

8.204 Whilst the development is deemed to constitute inappropriate development in the Metropolitan Green Belt, the applicant has demonstrated very special circumstances to enable officers to conclude that the development would not have any adverse impact on the openness of the Metropolitan Green Belt.

8.205 The scheme has been reduced in scale and significantly amended via the pre-application process to ensure that the layout, massing and design all respond positively to the local environment. The more compact form of the building in comparison to the existing allows extensive tree and landscape planting to be provided, the proposal well exceeding urban greening factor and net biodiversity gain targets.

8.206 The proposal has been designed to meet the functional needs of the school, providing high quality inside and outside learning facilities. There would be no adverse impact on existing sports facilities. There would be no adverse impact on any neighbouring residential property in terms of loss of light, privacy, outlook or noise disturbance.

8.207 Existing access and parking provision will not be affected by the proposed works. The existing access/highways issue that has been raised relating to Hollingsworth Road is an existing situation which will not be significantly additionally impacted by the current

proposal. Sustainable travel improvements will be facilitated through the School Travel Plan.

8.208 The development will meet energy performance targets. The proposal will cause no air or noise quality concerns. Sustainable drainage systems are proposed that meet with Lead Local Flood Authority requirements.

8.209 All other relevant policies and considerations, including the statutory duties set out in the Equalities Act 2010, the Human Rights Act, the Planning and Compulsory Purchase Act, and the Town and Country Planning Act, have been taken into account. Given the consistency of the scheme with the Development Plan and weighing this against all other material planning considerations, the proposal is considered to be acceptable in planning terms subject to the detailed recommendation set out in section 2 (RECOMMENDATION).