

DR/43/14

committee DEVELOPMENT & REGULATION

date 24 October 2014

COUNTY COUNCIL DEVELOPMENT

Proposal: **Erection of a two storey extension to provide three classrooms and ancillary space; cycle/scooter parking; and amendments to the levels of the south-western playground**

Location: **Staples Road Primary School, Staples Road, Loughton, Essex, IG10 1HR**

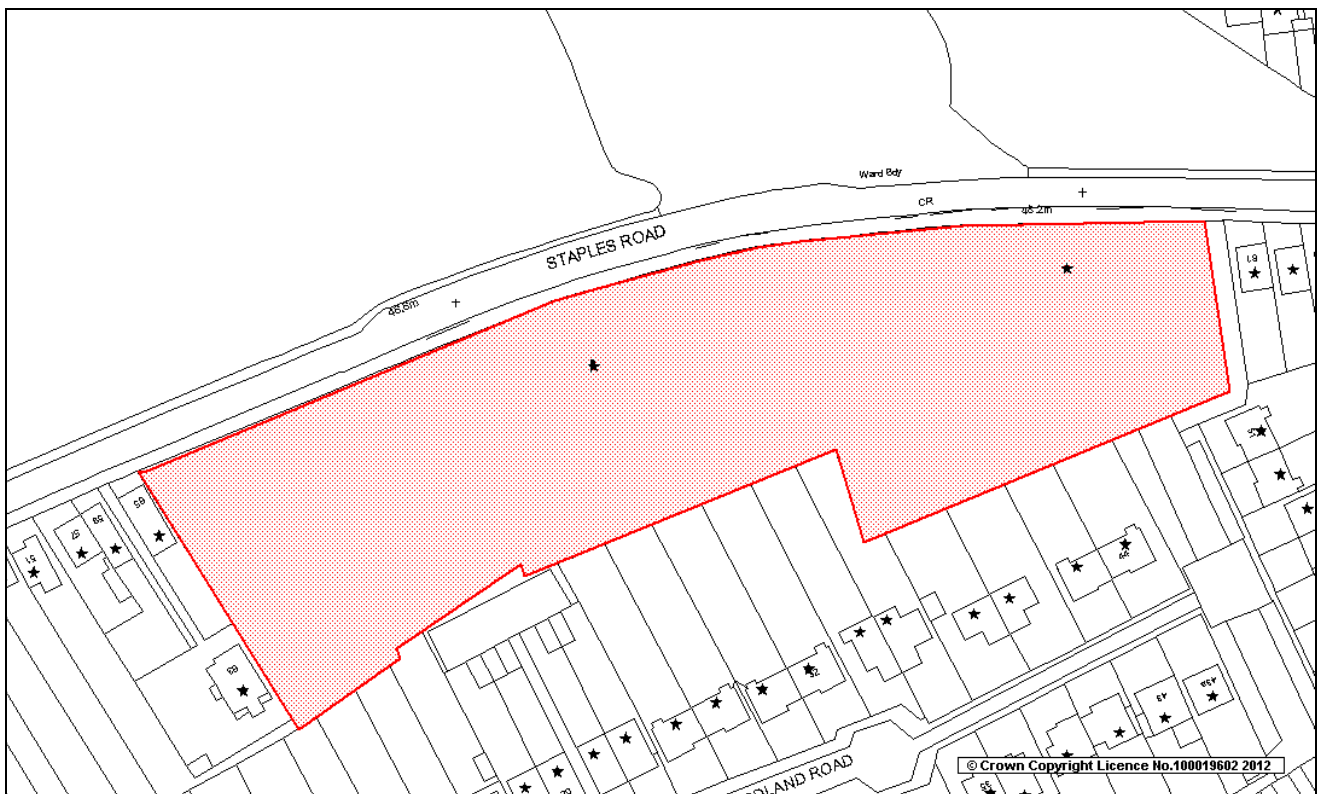
Ref: **CC/EPF/42/14**

Applicant: **Essex County Council**

Report by Director of Operations; Environment and Economy

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The full application can be viewed at www.essex.gov.uk/viewplanning



1. BACKGROUND & SITE

Staples Road Infant and Junior School site is situated to the south of Staples Road and to the north west of Loughton Town Centre, in a predominantly residential area. Residential properties adjoin the school boundary to the east and west in Staples Road and to the south in Woodlands Road. There are significant ground level changes between the northern boundary (Staples Road) of the site and the southern boundary.

The school site is separated from Epping Forest (to the north of the site) by Staples Road. The area to the north of Staples Road is protected by a number of environmental statutory and non-statutory designations including SSSI, Special Protection Area (SPA), Special Area of Conservation (SAC) and within the Green Belt. The school site is not covered by any of these statutory designations.

The school site falls within the Staples Road Conservation Area.

The existing school buildings are located along the northern boundary of the school site, with the Infant School to the east and the Junior School to the west. There is a relocatable classbase in the Infants School playground to the south of the school buildings. There are hard play areas in the southern portion of the site, although there are no playing fields. The original school building, although not nationally listed, is contained within the Epping Forest Historic Environment Record and therefore a locally listed building.

There are separate pedestrian entrance and exit points to both the Infants and Junior School buildings all via Staples Road.

There are no dedicated car parking spaces for the school and the only vehicular access, is reserved for emergency fire and safety access, which is to the west of the school buildings.

A brick wall base (approx. 1.6m high) with further wire mesh fencing above (to a total of approx. 3m high) forms the majority of the boundary treatment around the eastern, southern and western boundaries of the school site. A combination of black metal railings, brick piers and gates run along the northern boundary of the school site. Along this northern boundary is some low level vegetation, but also includes two large and well established pine trees adjacent to the northern perimeter and existing school buildings.

There have been a number of planning permissions on site. Most recently CC/EPF/36/14 was granted permission by the Secretary of State, to allow the demolition of a redundant outbuilding adjoined to the southern boundary wall. Planning permission was required for this demolition due to its location in the Conservation Area. The removal of this building has provided the school with increased hard play space of 77m².

Prior to this, there have been a number of extensions to the school, the most recent being CC/EPF/06/11 for a single storey extension to the entrance lobby and upper floor extension for Reception Room, together with remodelling works to undercroft. This resulted in a pastiche imitation of the Victorian detail, within the

centre of the school buildings. There have been further extensions, namely CC/EPF/20/07, which amended CC/EPF/78/06 which involved the demolition of an existing kitchen & dining block and construction of a 2 storey building for the provision of a new kitchen, dining area & ancillary storage facilities; with an entrance lobby & corridor connections to the existing school buildings.

2. PROPOSAL

The proposal has been put forward to assist in accommodating a growing number of children within the catchment area. The proposal would result in an additional 90 pupils and six staff. The main aspect of the proposal is the erection of the two storey extension, within the school boundary to the west of the existing school buildings. This would provide three additional classrooms (one on the ground floor and two on the upper floor) and ancillary facilities. These include classroom and external stores, cloakroom and toilet facilities, corridors and the plant room. This would amount to 314m² gross internal area.

The extension would not directly adjoin the existing building, which benefits from local listing status. Instead a linking corridor would join the existing building to the proposed new development. The proposal is located on an area of hard standing currently used as hard play space and would result in a total external footprint of 360m² and height of 10m, although the base is slightly lower than the adjacent existing building.

The proposal is set back from the existing buildings due to topography, the two large pines on the northern boundary and the footpath linking the playground to Staples Road.

The appearance of the building is proposed to be of contemporary design; simple in form and detail, which contrasts to the Victorian decorative arts and crafts style detail of the adjacent buildings. The gable ends are proposed in brick with the 'English bond' coursing broken with alternate projecting headers at first floor and above. The gable ends would be articulated to complement the ornamental gables on the existing buildings. The east and west elevation would be brick tile and different colours and textures in diaper patterns to bring a layer of variation and interest to the elevations. The windows would be set out symmetrically to retain the formal rhythm set out by the existing buildings. These would consist of white aluminium frames for thermal insulation, maximise daylighting, whilst minimising overheating through solar gain within the building.

As part of the proposal, the currently uneven hard playground would be levelled. This would involve using some material cut from the ground beneath the new extension but there would still need to be 177m³ of material imported to achieve this.

The extension would be used during the hours of 07:00 to 17:30 Monday to Friday

3. POLICIES

The following policies of the Epping Forest District Local Plan Adopted 1998 and alterations 2006 (EFDLP) provide the development plan framework for this

application. The following policies are of relevance to this application:

Policy Title	Policy Number
Protecting the quality of the rural and built environment	CP2
Sustainable building	CP5
Urban form and quality	CP7
Sustainable transport	CP9
Conspicuous development	GB7A
Epping Forest	HC5
Character, Appearance and Setting of Conservation Areas	HC6
Development Within Conservation Areas	HC7
Local list of buildings	HC13A
Areas of nature conservation	NC1
Adverse environmental impacts	RP5A
Playing fields (LL6)	RST14
Educational buildings outside the greenbelt (LL5)	CF5
Design of new buildings	DBE1
Effect on neighbouring properties	DBE2
Design in Urban areas	DBE3
Loss of amenity	DBE9
Edge of Settlement	LL3
Protection of urban open spaces	LL5
Partial development of urban open spaces	LL6
Adequacy of provision for landscape retention	LL10
Transport Assessments	ST3
Road Safety	ST4
Travel Plans	ST5
Vehicle Parking	ST6

The National Planning Policy Framework (NPPF), published in March 2012, sets out requirements for the determination of planning applications and is also a material consideration.

Paragraph 215 of the NPPF states, in summary, that due weight should be given to relevant policies in existing plans according to their degree of consistency with the Framework. The level of consistency of the policies contained within the Epping Forest District Local Plan (EFDLP) (adopted January 1998) and Alterations (adopted July 2006) is considered further in the report.

The development has been subject to pre-application consultation with Officers at Essex County Council and Braintree District Council, together with statutory and non-statutory consultees. The application includes a public involvement programme.

4. CONSULTATIONS

The application has been subject to two periods of consultation, the second focused consultation followed amendments to the design of windows and change in materials.

EPHING FOREST DISTRICT COUNCIL – No objection. The proposed extension is contemporary in design, but takes from the existing school building in its form, scale and facing materials. The contemporary design has a minimalist finish, does not compete or attempt to replicate the existing building and clearly denotes a new phase in the building's growth. Its lower eaves and ridge heights gives it a subservient appearance in relation to the school and the proposed narrow link allows the be read as a distinct entity. Proposal adheres to policies HC6 and HC7 as the development would not be detrimental to the character or appearance of the conservation area and it is sympathetic to the area in terms of its scale, massing, height and layout.

The access and parking for this school are far from ideal. It is noted many children walk to school or from cars parked a little distance away and it would be unreasonable to object to 3 extra classrooms on grounds of inadequate parking and aggravation of congestion issues in Staples Road. It would be advisable if the school travel plan is updated and it aims communicated to the parents.

NATURAL ENGLAND – No objection

ESSEX FIRE & RESCUE – No comments received

COUNTY COUNCIL'S NOISE CONSULTANT – No objection

COUNTY COUNCIL'S LIGHTING CONSULTANT – No objection, subject to a condition preventing fixed lighting to be until further information is submitted and approved.

SPORT ENGLAND – No comments to make

HIGHWAY AUTHORITY – No objection, subject to 2 conditions requiring:

- No development/groundworks/demolition until a Construction Method Statement has been submitted to and approved in writing by the Local Planning Authority.
- No beneficial occupation of the development until a school travel plan shall be submitted to and approved in writing by the Local Planning Authority

PLACE SERVICES (Ecology) – No objection

PLACE SERVICES (Trees) – No objection subject to implementing the measures set out in the submitted tree survey

PLACE SERVICES (Landscape) – No objection

PLACE SERVICES (Historic Environment) – No objection

PLACE SERVICES (Historic Buildings & Urban Design) – No objection, subject to a condition requiring:

- That the red plain tiles are substituted for the orange sand faced brick tiles
- The diaper pattern should be used
- Prior to construction large scale drawings to be submitted for approval to

show an elevation of the diaper pattern and detailed drawings of no more than 1:20 of the eaves and windows.

LOUGHTON TOWN COUNCIL – Object on the following grounds:

- School is unsuitable for expansion as this would reduce the already limited play space, impacting on health
- Lack of on-site parking
- Increased traffic congestion in Staples Road inconveniencing residents further
- North elevation is bland and does not enhance the streetscene in the Conservation area

LOCAL MEMBER – EPPING FOREST – Loughton Central – Objects to the design (particularly of windows) which contrast badly and inappropriately with the existing building. Satisfied with the educational need. Any further comments received will be reported

5. REPRESENTATIONS

27 properties were directly notified of the application. Seven letters of representation have been received, two of which were specifically in response to the changes in design. These relate to planning issues covering the following matters:

<u>Observation</u>	<u>Comment</u>
School entry policy is not strict enough to ensure pupils are only from the catchment area, so the premise of demand is false	Noted
The school has already been expanded to capacity, alternatively build in to the roof space	See Appraisal – section A
Constrained site: bounded by dwellings on three sides and the forest to the north	See Appraisal – section A
Build a new school elsewhere	See Appraisal – section A
Expand other smaller schools in the area (Whitebridge, Alderton, Thomas Willingale, Hereward & St. John Fisher Catholic) as this would have less residential/Highways/Play Space impacts than here	See Appraisal – section A
Staple Road primary is already much bigger than the average size primary school (Ofsted)	See Appraisal – Section A
Design of windows is out-of character with the conservation area.	See Appraisal – Section B
Continued piecemeal expansion damages design	See Appraisal – Section

integrity of the school	B
Proposal is of inferior design to the existing buildings	See Appraisal – Section B
Contrary to the Conservation Area Appraisal and Management Plan, which prevents unacceptable changes to the frontage	See Appraisal – Section B
Use of red bricks instead of London Yellow Stock bricks is inappropriate	See Appraisal – Section B
Despite the design changes, the windows still appear out-of-character, bleak and unfriendly	See Appraisal - Section B
There has been no survey of residents parking or parking provision	See Appraisal – Section C
No additional parking is proposed which is unacceptable, there is no off-street parking for homes on Staples Road and limited on-street parking	See Appraisal – Section C
Parents park on the pavement: this will be exacerbated resulting in safety issues for wheelchair users	See Appraisal – Section C
All surrounding roads are used for school parking, they cannot accommodate more staff and parents	See Appraisal – Section C
Proposals to introduce a goods vehicle loading bay will already increase parking pressures – should use other methods eg fixed access times/smaller delivery vehicles	Proposal is not part of this application See Appraisal – Section C
Due to before and afterschool clubs / Governors meetings etc parking/highway impacts are not restricted to the school day	See Appraisal – Section C
It is impossible for 2 cars to pass, so parents perform 3 point turns rather than using the turning head	See Appraisal – Section C
Shoppers, commuters, delivery vehicles, tradesmen, waste collection and container vehicle frequent the areas	Beyond the control of the applicant
Speed limit should be reduced to 20mph to reduce emissions and protect the forest, residents and children	Noted
It is not a planned modern estate, with modern pavements/roads	See Appraisal – Section C
Parents do not actually walk children to school as	See appraisal - Section

suggested / not realistic to expect this on wet cold dark days	C
ECC's Bikeability training is not available until year 5	See Appraisal – Section C
Irresponsible to promote walking/cycling due to traffic	See Appraisal – Section C
Why is underground discussed, if it is for children within the catchment area?	This was considered for access for teachers
ECC seeks to improve air quality, safety on the transport network and provide sustainable access, this proposal is not consistent with this	Noted
Ashley Grove is omitted from reports	Noted
Directly opposite the school is Epping Forest	See Appraisal – Section G
Surface flooding from the forest and cracked Victorian water pipes will be worsened by raising the playground height and may flood adjacent properties	See Appraisal – Section F
Raising the playground level will cause vibration and damage flagstones around adjacent properties manhole covers	See Appraisal – Section F
Requires conditions on working hours during demolition/construction	See Appraisal – Section D
There is insufficient playground space, which will be worsened	See Appraisal – Section D
Other schools in the area have playing fields and sufficient hard play space. Staples Road does not and pupils have to travel off-site for sports	See Appraisal – Section A

6. APPRAISAL

The key issues for consideration are:

- A. Need & principle of this location
- B. Design, Layout and Impacts on the Historic Environment
- C. Highways Impacts
- D. Impact on Play Space
- E. Surface Water and Drainage Impacts
- F. Residential Impacts
- G. Landscaping, Trees & Ecology

A NEED & PRINCIPLE OF THIS LOCATION

The NPPF requires Planning Authorities to give great weight to the need to expand or alter schools (para 72), which in summary is of great importance to ensure sufficient school places are available to meet the needs of new and existing communities. This supports the social sustainability theme, which is one of the three corner stones on which the NPPF is built.

More locally there are a number of Epping Forest District Council Policies which guide development towards certain locations. Policy CP7 (Urban form and quality) states 'new development in all urban areas which results in overdevelopment, unsympathetic change or loss of amenity will not be permitted' but does permit the use of higher densities where compatible with the character of the area concerned and urban design controls.

The Staples Road Primary School is a long and narrow site, constrained between Staples Road to the north and the adjacent dwellings and associated car parking to the south on Woodland Road. The result is that the main school buildings are located in the northern portion of the site, with the hard play area along the extensive southern boundary. There are no playing fields on site.

The applicant states that the driving force for this application is the need to provide sufficient school places for the anticipated demand in Loughton. It is specified that in 2014/15 there would be a deficit of 20 school places resulting from new housing developments in the area. This is forecast to rise to a deficit of 47 pupil places by 2017/18. It is stated that this would require an additional 1.5 forms of entry by 2017/18. The need for additional school places in Loughton is therefore considered to be justified. The proposal would increase the current pupil role of 520 pupil places (there are currently 525 children attending the school) to 610 pupil places.

Representations have been made which suggest this school is not appropriate for further expansion due to the constrained nature of the site. Responses consider there may not be a need to increase the pupil numbers as it cannot be certain that all of the existing and future pupils would be from the catchment area. Other responses suggest other local schools should be expanded, the roof space of the existing building should be used, or a new school should be constructed elsewhere, where there would be fewer impacts. It was considered an inappropriate site as it does not have any playing fields and the hard play space would be impacted.

Submitted alongside the planning application was an 'options study', which reviewed the other local schools which could potentially be extended to accommodate the extra pupils. Later submitted were further justifications as to why Staples Road was considered the most appropriate school to be developed. In summary, Staples Road was considered by the applicant to be the most appropriate location for expansion due to:

- A conversion of the roof space could not reach safety or building standards required of classrooms;

- An entire new primary school (and associated costs) cannot be justified elsewhere to meet the demand of a 0.5 form of entry;
- Alderton Infant & Junior Schools:
 - Expansion is already being pursued (in preparation for September 2014) as it is the most appropriate school for redevelopment, this however still requires 15 spaces per year to be provided elsewhere;
 - Would require the implementation of split classes (mixed age groups in classes, which is not considered the appropriate education experience for pupils;
 - Would lead to the creation of a 'supersized' school at Alderton with a combined roll of 735;
 - Development would affect the playing field, which would require a MUGA pitch to be installed and likely to receive objection from Sport England as the exception tests could not be met;
- Hereward Primary School:
 - Has already been recently expanded in 2011;
 - Development would lead to loss of heavily used SEN classbase;
 - Dining room would need to be increased in size;
 - Would result in loss of hard spay space, possibly requiring a MUGA, so likely to receive objection from Sport England, as the exception tests could not be met;
- Thomas Willingale
 - Development would be required on playing field and/or hard play area, which would require a MUGA pitch to be installed and likely to receive objection from Sport England as the exception tests could not be met;
- St. John Fisher Catholic Primary School:
 - This is a Catholic School, and therefore is usually a 'first preference' choice of families of that religious background. The trend indicates that demand is currently falling for places at St John Fisher Primary School;
 - Development would be required on playing field and/or hard play area, which would require a MUGA pitch to be installed and likely to receive objection from Sport England as the exception tests could not be met;
- Whitebridge Infant & Junior School:
 - Demand is located in the North of Loughton, and therefore not in the catchment area of Whitebridge, and would not address 'locational need';
 - Would result in significant distances for pupils to travel each day;
 - The school itself would require major structural reorganisation in order to begin to provide for key stage 1 pupils.

A further important material consideration is that Staples Road Primary is the 1st preference choice of many parents for their children within the local area.

It is considered that there is a justified need for additional pupil places within the Loughton area, due to the increased demand from additional housing. Following the further justification submitted and the emphasis of the NPPF requiring 'great weight' to be placed on the need to expand or alter schools, on balance the general principle of expanding the Staples Road school in favour of other schools in the local area is accepted, despite being a highly constrained site. This is subject to there being no further material considerations which outweigh the principle of using this location.

B DESIGN, LAYOUT & IMPACT ON THE HISTORIC ENVIRONMENT

With regards to the potential impact on the historic environment, Section [72](#) (1) of the Listed Building and Conservation Area Act 1990 (LBCAA) states, inter-alia that in considering whether to grant planning permission for development that would affect any buildings or other land in a conservation area, the local planning authority shall have special regard to the desirability of preserving or enhancing the character or appearance of that area.

Additionally, the NPPF places great importance on both good design in proposals and the importance of protecting the Historic Environment. Paragraph 56 of the NPPF states inter alia that great importance is attached to the good design: a key aspect of sustainable development and indivisible from good planning which should contribute positively to making places better. With regards to the Historic Environment, the NPPF (part 12) similarly recognises that heritage assets are irreplaceable resources and should be conserved in a manner appropriate to their significance, with any loss requiring clear and convincing justification, particularly if a loss of a significant (designated) asset would result. At paragraph 131, the NPPF states that in determining planning applications the LPA should take account of "the desirability of new development making a positive contribution to local character and distinctiveness" In this instance there is no loss of a heritage asset. However, if there is considered to be less than substantial harm, this should be weighed against the benefits of the proposal. It notes that not all elements of a Conservation Area would necessarily contribute to its significance.

More locally, there are a number of policies within the EFDC development framework regarding the historic environment. In respect to this application the applicable policies are Epping Forest (HC5), Character, Appearance and Setting of Conservation Areas (HC6), Development Within Conservation Areas (HC7) and Local list of buildings (HC13A). These in combination would only permit a development where it would not be detrimental to the character, appearance or setting of the conservation area. Any applications in Conservation Areas need to be of particularly high design standard to be:

- Sympathetic (in terms of scale, density, massing, height, layout, building line, landscape and access) to their character and appearance;
- Provide visually interesting roofscape in keeping with the character;
- Use of traditional facing materials, already evidence in the district;
- Have facades that provide appropriate horizontal and vertical balance, with proportionate wall to window ratio and incorporate visual intricacy compatible with facades of historic buildings.

Policies HC5 and HC13A give special consideration to Epping Forest and locally listed buildings respectively, which prevents granting of permission for proposals that could prejudice the historic nature and wildlife value of Epping Forest, or its function as an open space, or the locally listed building.

The local design policies relevant to this site consist of Design of new buildings (DBE1) and Design in Urban areas (DBE3). Together these require new proposals to:

- Respect their setting (in terms of scale, proportion, siting, massing, height, orientation, roof-line and detailing);
- Affect the street scene appropriate to their use or function, use appropriate vernacular materials;
- Use the surrounding spaces to respect character, provide suitable enclosure for intended users, whether this be private, semi-private or public spaces
- Ensure front elevations face outwards and contain main entrances.

The Sustainable Building (CP5) policy requires proposals to conserve energy (by minimising usage through building form, orientation thermal mass, fenestration, natural ventilation), water and other resources and protect environmental features and where appropriate include renewable energy facilities.

It is considered that all of these local Heritage and Design policies are consistent with the aims and objectives of the NPPF.

The application site is located within the Staples Road Conservation Area, which has a recently updated (April 2014) Character Appraisal and Management Plan, and is a material consideration in the determination of this application. Staples Road is a conservation area and abuts the York Hill conservation area (to the northeast). The area (and associated road network) has developed organically through time (not a planned modern estate resulting in lack of footpaths, parking and narrow roads) with distinct characters which require protection through the conservation area designation. Specifically, there are a number of reasons for Staples Road to be designated as a conservation area as described in the Character Appraisal, namely:

- Unaltered streetscape;
- Examples of work by notable 19th century architects;
- Variety of colours, textures and materials employed in frontages, creating a rich visual 'tapestry';
- Examples of innovative architectural features (particularly found on the school buildings);
- Association with important historic events (e.g. uses of the buildings during WWII)
- Former uses of buildings (e.g. no. 3 Melbourne cottage previously a retreat house for impoverished children)
- Links to notable historic figures (e.g. Robert Hunter, George Pearson)
- The distinctive forest edge location. Long, narrow building plots are orientated north to south, maximising woodland views;
- Tranquil location (with the exception of school drop off and collection)

times).

In particular the character area appraisal requires significant views both within and out of the conservation area are preserved and, where possible, enhanced and further strengthens the policy with regards to the use of traditional materials and that development should make a positive contribution to the character.

The school building adjacent to the proposal is not a nationally recognised heritage asset of importance, but is designated as a local listed building and therefore benefits from special consideration. Other buildings within the local list are Shaftesbury Retreat House and Forest Villa, which are located towards the western end of the Conservation area, where it is considered there would be minimal effect from proposed development. There are five other key buildings of townscape merit (one of which includes the new school hall, built between the locally listed elements of the school), but are considered to be beyond the influence of the proposal. It is noted that the view across the playground from Staples road towards the rear of the dwellings on Woodland Road is a key view from within the Conservation Area.

In addition, Policy ST4 (Road Safety) recommends refusal for any proposal that would result in excessive adverse effects on the character of an area, through the generation of additional traffic. It is considered of particular relevance as the proposal would affect the entire length of the Staples Road Conservation Area. The Transport Statement suggest that up to 183 pupils arrive by car at present which could increase by 30 as a result of the proposal. Initially this could result in 213 pupils arriving to school by car at the beginning and end of the school day, but if the targets within the Travel plan are realised would reduce to 177 pupils in three years. Due to the current levels of access by car, it is considered that in terms of the effect of additional movements in relation to the Character of the Conservation Area and therefore complies with policy ST4 in this respect.

The proposals have been designed in such a manner to respect the spacing and rhythm of the existing school buildings, in so far as the proposed gable ends are orientated north/south, facing the road to respond to the existing buildings. The decision was taken to set the main footprint away from the existing building with a limited link that minimises built intervention to the current built form.

The extension would be set back from the existing school, by 2m, and the ridge would be at a lower level to the original building, reflecting the subservient status of the building from the adjacent original Locally Listed building. This location also serves to preserve the existing black railings forming the boundary treatment and the current pedestrian footpath in to the playground area and protect the two well-established mature pine trees, which appear as a key feature of the street scene.

The decision was taken by the applicant to propose a building of simple form and detail, in contrast to the decorative arts and crafts style of the original building. In pre-application discussions with the both the Epping Forest and Place Services Historic Advisors, this was considered an appropriate approach to use as a pastiche method, may not result in enhancement of the conservation area, as the fine architectural details cannot be replicated in the current day.

Following objections from the County's historic advisors and concerns raised by local residents, the detail of the materials has been revised, to include varying colours and textures of brick tiles to the side elevations to create variety and interest. The gable ends (north and south elevations) would be 'English bond' red brickwork with interest created with alternate projecting headers and the gable end above the lower ground level. On these elevations there would be soldier header and sill to window surrounds. There would be large fixed windows on both north and south elevations, with an RAL coated aluminium frame coloured dark grey.

The east and west elevations have been revised to incorporate patterns created by using different textures and colours to create variety in the large elevation and create visual interest. The windows located on these elevations has also been revised, which result in an increased number of windows which now vary in size, to further reduce the concerns of the monotonous and institutional looking concerns voiced in objections. The materials and colours of these windows would continue to be RAL coated aluminium opening windows coloured dark grey. Similarly, the opening roof lights would be made from the same material, in the same colour.

On the east and west elevations, to maintain the simple form it is proposed to conceal the aluminium RAL coated (black) gutter along the eaves. The projecting gable end of the north and south elevation serves to conceal the black downpipes from the concealed gutters along the eastern and western elevations.

The windows have been designed to balance natural daylight, overheating, natural ventilation and useable internal wall space for classrooms. Increasing the size of the windows would reduce their operability by primary school children and increase the overheating through thermal gain.

The corridor link from the existing building would consist of sheet metal, pigmented zinc in Pigmento red colour. There would also be a large fixed window to the lower floor on the southern elevation of the link corridor, in the same colours and materials of as the fixed windows on the southern gable end.

The external door to the plant room, on the western elevation would be RAL coated steel of an undetermined colour (which would require further submission of details by condition, should permission be granted).

There have been a number of objections stating that the proposed design is inferior to the existing buildings, and proposals should enhance the street scene and not detract from it, as required in the conservation area appraisal and management plan. It is acknowledged that 'good design' is extremely subjective to the individual, and the contemporary style which has been proposed for the development is not satisfactory to everybody. However, it is accepted that the contemporary approach to the extension is suitable in this location in principle, as advised by ECC and Epping District historic environment officers and Essex County Council, due to the inability to replicate the fine detailing of the arts and crafts style of the main buildings. It is considered possible that a pastiche design would look out of place and risk detracting from the main buildings and

conservation area.

There was one local objection to the piecemeal nature of the development and the fact that this damages the integrity of the Conservation Area. Conversely, a number of representations cited the 'unaltered streetscape' as objections. It is considered that this most recent proposal represents the next phase of the school's development. The Staples Road Conservation Area evolved organically over time, to which the Conservation Area appraisal note there is a rich visual tapestry with examples of innovative architectural features. The school hall developed during the 1990's has been listed as a key building of townscape merit, which illustrates the evolving nature of the street. The management plan looks not to prevent future development, but manage developments that are needed sensitively within the Conservation Area. The school has evolved continually for a century, since its initial development to allow the school to meet the needs of the families in the catchment area. This proposal represents the latest stage of evolution, with the need of the development has been fully established in section A.

More specifically, there has been several objections to the design of the windows within the proposals, including the local County Member for Loughton Central and Loughton Town Council, noting that despite the design changes, the windows still appear out-of-character, bleak and unfriendly. Importantly, Place Services (Urban Design) had concerns regarding the original elevations void to solid relationship, and their 'institutional' arrangement, which is specifically noted within policy HC7. Following further negotiations and submission of design details, one representation states that larger, more light admitting, windows can only improve teaching ability. Furthermore, the County historic building and urban design advisors are satisfied with the design, including window details submitted, subject to a condition, should planning permission be granted. The condition would require the following details to be submitted:

- The red plain tiles substituted for the orange sand faced brick tiles;
- The diaper pattern should be used;
- Prior to construction large scale drawings to be submitted for approval to show an elevation of the diaper pattern and detailed drawings of no more than 1:20 of the eaves and windows.

Additionally there has been one local objection made to the use of red brick tiles on the eastern and western elevations, and the red English bond brickwork on the northern and southern elevations. The representation considered this inappropriate as London Yellow Stock bricks is used within the rest of the school. This has been addressed following the submission of amendments to brick and tile pattern details are satisfied with the materials and the above required condition from the consultees.

It is considered that the Sustainable Building (CP5) policy has been adhered to through the provision of the aluminium framed, which offer excellent thermal insulation and therefore conserves energy by preventing heat loss as much as is practicable. Additionally the provision of windows assists with natural ventilation and reduce the need for internal lighting.

In summary, it is considered that it has been suitably demonstrated that the setting of the locally listed adjacent school building and Conservation Area would be preserved conforming with Section [72](#) (1) of the Listed Building and Conservation Area Act 1990 (LBCAA), the NPPF or local policies HC5, HC6, HC7, HC13A, DBE1, DBE3, CP5 or ST4 regarding heritage assets and design. It is also considered that the design is in accordance with the recently updated (April 2014) Character Appraisal and management plan for the Staples Road Conservation Area.

C HIGHWAYS IMPACTS

Sustainable transport is a key NPPF topic (section 4) as it is relevant to all three sustainability strands (social, environmental and economic). The NPPF requires reductions in emissions and congestion, with safe and suitable access. Specifically, paragraph 38 requires primary schools to be located within walking distance of most properties. Paragraphs 39 to 41 in particular relate to parking but only in relations to setting local parking standards, by local authorities. It does however indicate that Local Authorities should take in to account the accessibility of the development, the availability of and opportunities for public transport and the overall need to reduce the use of high-emission vehicles.

There are several local policies relating to Highways and access within the Epping Forest Local Plan. Policy CP9 (Sustainable Transport) requires schemes to be use/promote sustainable forms of travel and transport and importantly ensure access by all sectors of the community, including the mobility impaired and provide for a safe and efficient transportation network that improves the accessibility of local communities.

ST3 (Transport Assessments) and ST5 (Travel Plans) require relevant proposal to have a transport assessment and travel plan submitted respectively. Both of these have been submitted as part of the application. ST3 additionally notes that if there are significant implications are identified, these should be reduced to acceptable levels within the proposal, which may be subject to legal agreements to ensure that the measures are implemented, if permission is granted.

ST4 (Road Safety) states permission would only be granted where the proposal either well related to the road hierarchy, unlikely to increase congestion, not be detrimental to highway safety, would not have excessive adverse traffic generation effects, on the character of the area through which the new traffic would move. The policy requires suitable mitigation measures (which may be subject to legal agreements) to address any road safety issues.

Finally, policy ST6 (Vehicle Parking) requires proposals to be accordance with the most up to date adopted parking standards. At present, this is the Essex Adopted Parking Standards (2009) requires 1 space per 15 pupils, with the result of a 610 primary school requiring 41 parking spaces, of which 2 should be allocated for disabled parking.

Access to the Primary school is gained from Staples Road to the north of the site, which separates the school site from Epping Forest. Staples Road is accessed

from York Hill, directly linking to the High Road (A121) and subject to a 30mph speed limit. York Hill serves a number of other residential roads to the north west whilst Staples Road continues in a south westward direction. Formally, Staples Road was a 'through road', but currently to the west of Shaftsbury, the road is only available for pedestrian/emergency access. At this location there is a turning head for vehicles entering the road from the York Hill end.

There are various parking restrictions along the length of Staples Road, which leaves little opportunity for parking by teachers and/or parents. The predominant area of unrestricted parking is on the northern side of Staples Road (adjacent to Epping Forest) along the school's frontage. Staples Road varies in width between 5.6 and 5.8 metres, which should be wide enough for two cars to pass. However, on-street parking restricts in both designated and undesignated areas the free flow of traffic.

The Transport Statement identifies that the Highway Authority has confirmed that Staples Road experiences a number of issues surrounding congestion and parking, and a looking in to measures to address these.

The application suggests as a result of the proposal an additional 6 full time equivalent staff would be required, who would be encouraged to use public transport through the updated travel plan, but may need to use the car if sustainable travel modes are not available. In addition, it is estimated that of the additional 90 pupils 34% would be taken to and from school by cars and car share arrangements. This would result in up to an additional 30 car movements per peak travel period. Again, the updated travel plan encourages increased use of sustainable travel options to school, suggesting that 10% of pupils arriving by car would reduce by 10% across the entire 620 pupil places in three years. Long term this would result in a total of 177 pupils arriving to school by car/car share.

Vehicular Traffic Impact - Parking

Due to the constricted nature of the site, the school has no dedicated staff/visitor car parking area on-site and no additional parking is proposed as a result of the application, despite an additional 6 full time equivalent staff being required. The northern side of Staples Road (adjacent to the Epping Forest) is used by the staff during the school day, and also by parents at drop off and collection times. There is severely restricted off road parking for the residents of Staples Road, with the predominant parking being residents on-road parking.

There have been a number of objections from local residents, all of which describe the current lack of parking in the area, and the inconvenience cause at pupil drop off and collection times. Other issues described were parking of vehicles in the turning circle, in front of driveways and/or on pavements, restricting access for the less mobile/wheelchair users, which causes health and safety concerns. Additional comments consider that less parents walk their children to school than is assumed in the transport statement and travel plan. There were other representations noting that there have been consultations on separate proposals to introducing a good vehicle loading bay has not been addressed and would reduce car parking spaces further.

As part of the Highway Authority's response officers acknowledge there are local issues regarding the short-term parking by parents within the vicinity of the school; however, this is for a limited period at the beginning and end of the school day during term time. It is noted that these issues are not dissimilar to problems experienced near to schools across the county. They also note that there are no parking restrictions being considered for this proposal as there is a parking scheme currently being progressed. The North Essex Parking Partnership has informed the Highway Authority that an informal consultation on a residents parking scheme was not supported at this location so this option would not be pursued as part of this application.

Vehicular Traffic Impact - Congestion & Safety Impacts

There have been a number of objections noting the congestion experienced already in Staples Road, in particular restricting access to dwellings for residents. The parking situation in Staples Road affects the congestion experienced here. This appears to be prevalent at times when parents are dropping off or collecting their children's, although objections also note the school is not the sole cause of the congestion, which is also hampered by shoppers and commuters, which is beyond the control of the applicant. These responses consider the increase of 6 full time equivalent staff and 90 pupils would exacerbate the current situation.

The applicant has demonstrated to the satisfaction of the Highway Authority that the likely generated vehicle movements of an additional 90 pupils is likely to be no more than 20 a day. The applicant has assumed that as the pupils would be from the catchment area that at least two thirds would not be travelling by car, as is currently the case. Consequently the Highway Authority consider the proposal would only have a very minimal impact on the existing situation along Staples Road and therefore would not be detrimental to highway safety, capacity or efficiency at this location. It is therefore considered that the proposal is in compliance with policy ST4.

Sustainable Methods of Transport

The submitted travel plan and transport statement both serve to identify the current methods of travelling to school and the projected results if the proposal were to be permitted. A number of objections have been raised by local residents in terms of the quality of the submitted documents, and specifically relating to the contents therein.

Firstly, one objection noted there had been no there has been no survey of residents parking provision and another questioned the accuracy of the submitted documents in terms of transport. This was two-fold; firstly considers that the statement that parents walk children to school is utterly false and secondly the accuracy of survey data collected is questioned due the number of assumptions and their cumulative effect on the data. The Highway Authority has reviewed the submitted documents and has no reason to disagree with its approach. It is therefore considered that these documents are able to be relied upon in the determination of the application.

Further representations note that it is not safe to encourage more children to walk

or cycle from home or the nearest bus stop, due to the already impractical, unsafe, narrow and broken pavements. A further noted that only children in the upper years of the school are able to take their bike ability test and so it is inadvisable for younger children to use bicycles to school.

The Highway Authority has noted in its response that the school would be updating and monitoring their travel plan as part of the application. The Highway Authority stated it is clear from the submitted plan content that the school would be doing everything possible to promote sustainable modes of travel to and from school by encouraging parent, pupils and staff to walk/cycle to school where possible and discourage inappropriate parking. As such, the Highway Authority does not object to the proposal on this matter, but requires the school prepares an updated travel plan. The principle of this has been agreed with the applicant and a suitable planning informative could be imposed should permission be granted.

Construction Traffic Impact

In addition to the potential operational impacts on the Highway, the construction traffic may also have an impact, so must be considered, although this would only be for a temporary period. A further representation objected as there are no fixed times proposed for delivery vehicles to reduce traffic flow and obstruction issues.

The Transport Statement suggests that the on-site construction traffic would be less than the proposed extensions daily traffic movements (30 per peak hour, as noted above), and therefore would not have implications on the wider traffic network. The statement also alludes to the submission of a construction management plan and that construction vehicles would not be permitted between 08:15 to 09:15 and 14:45 to 15:45 hours to avoid conflicts and amenity issues for residential and school related traffic.

The Highway Authority does not object to the proposal with respect to the construction traffic impact, subject to a pre-commencement condition being applied to any grant of permission. This would require the submission and approval in writing by the County Planning Authority of a Construction Method Statement detailing the provision of the following clear of the highway:

- safe access into the site
- the parking of vehicles of site operatives and visitors
- loading and unloading of plant and materials
- storage of plant and materials used in constructing the development
- wheel and underbody washing facilities

In conclusion, in terms of highway impacts, it is noted that there are longstanding issues regarding congestion and parking problems experienced in Staples Road. The submission of the travel statement and travel plan are considered by the Highway Authority to be of a sufficient standard. It is therefore considered that the proposal satisfies ST3 and ST5. The potential maximum increase of 20 vehicles is not considered significant enough to warrant refusal of planning permission under policies ST3, ST4 and ST6. With regards to construction traffic, it is estimated that during this temporary period there would be less vehicular movements generated, than during the occupation of the extension. However, to

ensure highway safety is maintained a condition would be applied to require the submission and approval of a pre-commencement condition for a Construction Method Statement should planning permission be granted. The information contained within the travel plan is sufficient to satisfy policy CP9, provided a condition is attached to any permission granted to ensure an updated travel plan is submitted and approved in writing by the County Planning Authority prior to beneficial occupation of the extension. Therefore in terms of highways there is considered to be no harm significant enough to warrant refusal of this application, and it complies with the relevant policies contained within the adopted local development framework or the NPPF.

D IMPACT ON PLAY SPACE

One of the cornerstones of the NPPF is the social sustainability aspect, of which Health and wellbeing plays a considerable part, as it looks to promote healthy communities. Within paragraph 74, the NPPF states inter alia that existing open space (including playing fields) should not be built on unless this space is surplus to requirements in the local area, the loss would be replaced, or existing provision would be improved to mitigate the loss.

Within the Epping Forest District Local Plan and Alterations (2006) provides more local consideration of playing fields through policies CF5 (educational buildings outside the Green Belt) RST14 (Playing fields) LL5 (protection of urban open spaces) and LL6 (partial development of urban open spaces). Both policies CF5, LL6 and RST14, in combination would only permit some additional development on existing school sites, if it:

- Does not involve the loss of any playing fields;
- The total loss of or excessive adverse effect upon open space.
- Provided the predominantly open nature of the remainder of the site is retained and does not ;
- The scheme provides/enhances recreational potential of the remainder of the site and/or there is appropriate alternate provision provided;
- There is an excess of sports pitch provision in the area.

All of these policies are considered to comply with the aims and objectives of the NPPF. In addition, all of these policies specifically relate to playing fields, rather than hard play space. However, it is considered that in the absence of on-site playing fields, it is appropriate to apply these policies to the hard play area.

It is important to note that on-site there is no playing field provision, with only hard play space provision (totalling 2,558m² for the Junior school currently), with field based sports utilising the local cricket field. ECC are in the process of arranging a formal agreement so that this field and an additional field will be available to them. It must be noted that the BB99 guidelines¹ require an area of Hard Play (Informal and social) of approximately 1,300 m² for a 610 place school. Therefore, there would remain an excess of 1,258m² as a result of the proposal. At present, there is a marked netball pitch on the hard surface, but this is impacted upon by the uneven and sloping nature of the site. The hard play surface is made of tarmac,

¹ Building Bulletin 99 (2nd Edition): <http://dera.ioe.ac.uk/6318/1/BB99%20revise.pdf>

is relatively narrow and runs the length of the site on the southern boundary.

It is noted within the application that there are 3 structures located on the hardplay space, further limiting the potential:

- An outbuilding adjoined to the southern boundary wall
Planning permission CC/EPF/36/14 was granted for the outbuildings demolition. In effect, this provides the school with increased hard play space of approximately 77m².
- A pre-fabricated temporary classroom, further east on the site
As part of this application, this would be removed, which would provide a further 90m² hard playspace.
- An arbour (next to the outbuilding) for outdoor learning, not affected by the proposal.

When all of this is taken in to consideration against the total footprint of the proposed new extension (360 m²), overall this would constitute a loss of 11m². The location of the proposal is sited adjacent to the existing building, which is considered to comply with policies CF5, LL5, LL6 and RST14, in so far as the predominantly open nature of the remainder of the site is retained.

As part of this application, to address the net loss of 11m² of hard play space, it is proposed the south-west corner of the site would be filled to improve the levels for playing sport, which would result in a maximum increase in height of 880mm at the boundary. This would be achieved through the use of retaining gabions around the perimeter using on site material from the development footprint (cut and fill), but would also require importation of 177m³ material to help raise the ground. The result would be the provision of a recreational sized netball court, set out to Sport England requirements.

There have been a number of objections from local residents and Loughton Town Council, regarding the lack of playing fields associated with the school, the reduction in hard play space and the resulting impact on the health and wellbeing of the pupils. Sport England however do not have any comments to make in relation to the proposal.

On balance, it is considered that the overall loss of 11m² of hard play space is not significant to warrant refusal of this application (in terms of excessive adverse effect on open space), particularly as this is significantly above the DfE recommendations for this sized school. Although it is not ideal that the playing fields used are not within the school site, the use of these would not be further impinged upon by these proposals. Although there would be a small overall reduction (even when considering the removal of the outbuilding (CC/EPF/36/12) and the temporary classbase, this is mitigated through the enhanced recreational potential through the provision of a recreational sized netball court, set out to Sport England requirements. It is therefore considered to comply with policies CF5, LL5, LL6 and RST14, in relation to hard play space provision and therefore not contrary to NPPF's requirement for social sustainability and health and well-being.

E SURFACE AND DRAINAGE IMPACTS

The NPPF places great emphasis on meeting the challenge of flooding, requiring planning authorities to take full account of flood risk. Development should be directed to areas with lower risk of flooding.

Epping Forest policies relating to flooding encompass CP2 (Protecting the Quality of the Rural and Built Environment), U1 (infrastructure adequacy), U2 (Development in flood risk areas), U3A (Catchment Effects). These all aim to managing the demand for water resources and sewerage infrastructure by controlling the location, scale and phasing of development, ensuring proper regard to the adequacy of the existing water infrastructure and prevent significant adverse effects upon flooding and/or foul water infrastructure

The application is not located within an area at a high risk of flooding, as defined by the Environment Agency flood risk zones. It is therefore in accordance with policy U2. The proposal would raise the level of the playground in the south-western corner to mitigate for the loss of hard play space. This would result of a maximum increase in height by 880mm.

There have been a number of responses received, detailing concerns of exacerbating existing pooling problems on the playground, from surface water runoff from the tarmacked area and Epping Forest. Additionally there have been concerns raised relating to the structural integrity and capacity of the underground Victorian foul water pipes.

As a result of the concerns raised the applicant has provided further information in support of the application. Confirmation from Thames Water has been provided, stating they do not have any concerns regarding the proposed increase in foul water flows from the development and a net reduction is expected in surface water flows.

In addition, the applicant states that there is proposed to be a drainage channel to be positioned inside the boundary line, running the length and width of the re-graded playground. This shall be sized accordingly to intercept and re-direct all surface water accumulating in this area, down and into the below ground drainage system. This is however, not shown within the sections provided. It is therefore considered appropriate to impose a condition, requiring the dimensions of this to be submitted and agreed in writing by the County Planning Authority prior to construction to ensure the compliance with national and local policies.

With the addition of an appropriate pre-commencement condition to ensure that any surface water pooling is managed within the site, it is considered there is no reason to refuse permission on these grounds. It is considered to be in compliance with policies CP2, U1, U2, U3A and the NPPF, as it would not lead to significant increase in surface water flooding, or result in exceedance of the foul water infrastructure capacity.

F RESIDENTIAL IMPACTS

One of the core planning principles contained within the NPPF seeks to protect

local and residential amenity to ensure that proposals are socially sustainable. More locally, there are a number of policies within the EFDC development plan, specifically loss of amenity (DBE9), effect on neighbouring properties (DBE2) and adverse environmental impacts (RP5A). These in combination, look to prevent development that would have excessive local and residential amenity impacts by way of noise, vibration, air, ground water, light pollution, visual impact, overlooking, loss of daylight/sunlight or other disturbance.

Noise: As with any construction project, there would be some increased noise during the construction of the extension. One response resulting from the consultation suggests a condition should be implemented to restrict working hours during construction to reduce disturbance to local residents. Additionally, there could also be some increase due to the increase of 90 pupils within the site once it is operational.

However, the ECC's Noise Consultant has no concerns regarding the information regarding noise contained within the application (either during the construction or operational phase of the development) and therefore has no objection to the proposals. It is therefore considered that there is no reason to refuse the application on noise grounds.

Lighting: As part of the application plan number A050 (rev A) 'Proposed elevations' (dated May 2014) was submitted with regards to the locations of the proposed external lighting. These have been located on the southern, western and northern elevations. Later further information submitted in the form of luminaire data and lighting effects calculations.

The Lighting consultant has no objection to the proposed lighting information submitted thus far, but this is subject to the submission of further details by condition. Should planning permission be granted this would be a pre-commencement condition requiring the submission of additional information to be submitted and approved in writing by the Local Planning Authority. The information required would be as follows:

- Details of the location, height, tilt, lighting controls, lighting design, illuminance levels, uniformities and spill light contour lines on to Ordnance Survey mapping;
- The details shall include a design summary to include an overview of the lighting design
 - This must include the Lighting Standards that been applied and justification for these standards. This must ensure the lighting is designed to an appropriate lighting standard to allow children and adults safe passage around the school when there is poor visibility but would minimise the potential nuisance of light spillage on the local environment, adjoining properties and highways;
 - Comments on the wildlife habitats in the area that maybe affected by light.

Raising the playground level: Part of the application resulting in the raising of the playground level in the southwest corner of the site to provide a more level

playing surface within the hard play area. This would involve using some material cut from the ground beneath the new extension but there would still need to be 177m³ of material imported to achieve this.

A number of objections relate specifically to this aspect of the proposal. Specifically these note that this could:

- Exacerbate problems caused by considerable underground and surface water flowing from the Forest;
- Result in vibration during construction, potentially cause further cracking around local manhole flagstones and damage the underground Victorian pipes therefore causing further flooding;
- Be very expensive and is not necessary as part of the proposal;
- The greater height would result in more balls and stones being thrown over the fence on to adjacent dwelling roofs.

As discussed in the section above (section D of this report) there is a need to improve the hard play space within the school as part of the proposal to increase the pupil numbers of the school and small net loss of hard play space resulting from the proposal.

It is not considered that the increase in height of the playground in its south-western most corner would significantly increase the amount of objects landing within adjacent properties.

As discussed in section E of this report, it is not considered that any part of the proposal would significantly increase the amount of flooding experienced within the local area, either during the construction or operation of the extension.

It is considered that this aspect of the development could have some impacts on residential amenity. Although it is not considered significant enough in terms of local or national policy to warrant refusal of the planning application, it is considered necessary to incorporate a condition restricting the hours of construction, as noted earlier in this section of the report.

General Amenity: A number of responses note that the local residents quality of life is diminishing, and that they are tolerant of the school and its activities during the school day, but afterschool clubs and meetings beyond the school day increase the problems experienced.

In light of the above sections of this report it is not considered that the general amenity of local residents would be significantly reduced as a result of this proposal. Additionally, the impacts of the afterschool clubs and meetings could not be rectified with the refusal of this application, as these are an essential part of the schools existing activities.

In summary, although both the construction and operational phases could have some impacts on the residential amenity, it is not considered that with the imposition of appropriate conditions that the impact of the proposal would be so significant that it would be contrary to policies DBE9, DBE2, RP5A or the NPPF. Therefore, it is not considered appropriate to refuse permission for the application,

subject to conditions requiring additional information regarding lighting and restriction on the hours of construction.

G LANDSCAPING ,TREES & ECOLOGY

One of the three main strands of sustainability (according to the NPPF) is environmental sustainability, which requires, protection and enhancement of the natural environment.

More locally, policies CP2 (protecting the quality of the rural and built environment), NC1 (SPAs, SACs, and SSSIs), RP5A (adverse environmental impacts) and LL10 (adequacy of provision for landscape retention) consider the natural environment. These all look to maintaining the quality of the environment, using the urban fringe appropriately, preserving and enhancing the biodiversity, especially for protected species and/or at nationally and internationally valuable sites. Policy LL10 specifically relates to protection of trees and man-made features of interest. All of these policies are considered to concur with the NPPF as they all look to protect and enhance the environmental sustainability.

Ecology: A Preliminary Ecological Appraisal has been submitted, which included screening for the need of Habitats Regulations Assessment, stating further assessment was not necessary. At the point of submission, the proposal was screened by the County Planning Authority, where this was confirmed.

The submitted Phase 1 survey concludes that the majority of the site is of negligible ecological value as it comprises hard surfaced playground. There is a hedge and specimen trees along the northern boundary of the site, but did not identify signs of protected species including bats.

There has been no objection from the Place Services ecologist, so long as works are sensitive to nesting birds and undertaken between 31st March and 1st September. It is considered this would warrant a condition to be attached, should planning permission be granted.

In addition Epping Forest (SSSI and SAC) is located adjacent to the site, opposite Staples Road. The submitted assessment considered that the likelihood of adverse impacts to this designated site to be is very low and insignificant in terms of effects on the qualifying features of the SAC. However, the report made recommendations made in relation to minimising noise and dust pollution, which the Place Services ecologist considered should be adhered to (para 3.3.2). Again, this would warrant the imposition of appropriate condition(s) should the proposal be granted.

With the imposition of appropriate conditions, it is considered that the proposal is in accordance with policies CP2, NC1, RP5A and therefore the NPPF in relation to biodiversity, protected species and the nationally/internationally designated Epping Forest.

Landscaping & Trees: The Arboricultural Impact Assessment in accordance with BS5837:2012 has been submitted in support of the application. It states the most important trees in proximity to the scheme are the two mature pines and a less mature example of the same species adjacent to the northern boundary. There

are further trees within the hedge forming the northern boundary treatment, but these are at greater distance from the proposal.

It is thought these pines were planted as a deliberate landscape feature and are therefore important in terms of policy LL10, as they dominate the street scene. These are already constrained area separated from the proposed development by the footpath from the school playground and Staples Road itself.

It is noted that the proposed development has been sited to reduce any impact of the foundations on the Root protection area of the two dominant pine trees. However, the arboricultural report recommend the following:

- The small immature pine is removed to protect the viability of the 2 mature specimens
- There should be no below ground excavations within the root protection area of the 2 mature pine specimens
- A defined tree protection area/barrier must be submitted and approved in writing by the county planning authority to restrict damaging above ground activities to all trees on site.
- A strategy for tree canopy reduction must be submitted and approved in writing by the county planning authority to restrict impacts on the canopy as a result of construction activities/shading of the new building.

There has been no objection from Place Service (Trees) or Place Services (Landscape) regarding the impacts on existing tree stock, subject to the recommendations set out within the Arboricultural Impact Assessment.

It is considered that the recommendations of the Arboricultural Impact Assessment could be required by conditions, in the event that permission is granted. This would include protection of the Root protection area of the feature pine trees in the north that the proposal is in compliance with policy LL10 and therefore the NPPF.

7. CONCLUSION

Following the submission of additional details, it is considered that there is a justified need for the increase in pupil places within the Loughton catchment area and that Staples Road primary school is the most appropriate location for this expansion. Although this is subject to no significant material considerations suggesting otherwise.

Importantly the Staples Road Primary school is located within the Staples Road conservation area and the extension would be linked (via a corridor) to a locally listed building. Through the initial design process, pre-application discussion and improvements made to the proposal as a result of the consultation of the application, a modern approach has been taken to the extension (rather than a patishe replication). This has been amended in response to concerns to alter the gable ends and projecting header course on the northern and southern elevations, the solid to void relationship on the eastern and western elevations, and the inclusion of a diapering effect to create patterns of textures and colours on the large western façade.

Although it is noted that 'good design' is extremely subjective to the individual, as a result of these changes, it is considered that it has been suitably demonstrated that the adjacent school building of local heritage importance and the nationally important conservation area, in principle, would not be impacted upon as to be contrary to Section [72](#) (1) of the Listed Building and Conservation Area Act 1990 (LBCAA), the NPPF or local policies HC5, HC6, HC7, HC13A, DBE1, DBE3, CP5 or ST4 regarding heritage assets and design. This is subject to the submission of further information by condition, which would require large scale drawings to be submitted for approval to show an elevation of the diaper pattern and detailed drawings of no more than 1:20 of the eaves and windows and detailing the use of orange sand faced brick tiles rather than red brick tiles. It is also considered that the design is in accordance with the recently updated (April 2014) Character Appraisal and management plan for the Staples Road Conservation Area.

In terms of highway impacts, it is noted that there are longstanding issues regarding congestion and parking problems experienced in Staples Road. Proposals which could exacerbate this is a concern of local residents, however, some of the objections received are beyond the applicants control, and would not be improved with the refusal of the application. The submission of the travel statement and travel plan satisfies policies ST3, ST5 and CP9 provided a condition is attached to any permission granted to ensure an updated travel plan is submitted and approved in writing by the County Planning Authority prior to beneficial occupation of the extension. The potential maximum increase of 20 vehicles is not considered significant enough to warrant refusal of planning permission under policies ST3, ST4 and ST6. To ensure highway safety is maintained during the construction activities, a condition would be applied to require the submission and approval of a pre-commencement condition for a Construction Method Statement should planning permission be granted. Therefore in terms of highways there is considered to be no harm significant enough to warrant refusal of this application, and it complies with the relevant policies contained within the adopted local development framework or the NPPF.

With the expansion of the school building footprint, there were concerns regarding the impact on hard play space within the school site, particularly as the school does not benefit from playing field on site, requiring pupils to travel to such facilities. It has been suitably demonstrated that with the demolition of the outbuilding permitted (planning ref: CC/EPF/36/14) and the removal of the temporary classbase as part of this application that there would only be a net loss of 11m² of hard play space. In light of this minimal loss, the proposal incorporates the improvement of the existing hard play space, by creating a level playing court, in accordance with the specifications set out by Sport England. It is therefore considered that the proposal should not be refused on these grounds through policies CF5, LL5, LL6, RST14 and not be contrary to NPPF's requirement for social sustainability and health and well-being.

The development is not located in an area at risk of flooding as identified by the Environment Agency. With the addition of an appropriate pre-commencement condition to ensure that any surface water pooling at the south western portion of the site is managed within the site, it is considered there is no reason to refuse permission on these grounds, as it is in compliance with policies CP2, U1, U2,

U3A and the NPPF, as it would not lead to significant increase in surface water flooding, or result in exceedance of the foul water infrastructure capacity.

A number of concerns were raised regarding impacts on residential amenity, including noise, lighting, construction effects of raising the playground level and general loss of quality of life. Although both the construction and operational phases could have some impacts on the residential amenity, it is not considered that with the imposition of appropriate conditions that the impact of the proposal would be so significant that it would be contrary to policies DBE9, DBE2, RP5A or the NPPF. Therefore, it is not considered appropriate to refuse permission for the application, subject to conditions requiring additional information regarding lighting and restriction on the hours of construction.

With regards to potential impacts on ecology, landscaping and trees there is no reason to refuse the application, by way of policies CP2, NC1, RP5A or LL10. It is considered that the proposal is in compliance with the NPPF in relation to biodiversity, protected species and the nationally/internationally designated Epping Forest. This is subject to the inclusion of conditions with any planning permission to ensure the recommendations contained within the Preliminary Ecological Appraisal and Arboricultural Impact Assessment.

Following the assessment of the consistency of the adopted local policies (to accord with paragraph 214 of the NPPF), it is considered that all of the policies considered within this report are in compliance and generally consistent with the aims of the NPPF. In particular, it is considered that the three strands of sustainability (Environmental, Social and Economic) as outlined within the NPPF, have been considered and incorporated within the proposals. This is particularly evident in the economic and social requirements to locate additional pupil spaces within the Loughton school catchment area and the improvement of the hard play space. Environmentally, the project incorporates measures to minimise energy consumption, by minimising usage through building form, orientation thermal mass, fenestration, natural ventilation.

On balance therefore, it is considered that the proposal conforms with the relevant policies of the Development Plan, taken as a whole and the policies relied upon in this report are considered to be consistent with the Framework. The proposal is considered acceptable subject to the imposition of appropriate conditions.

8. RECOMMENDED

That pursuant to Regulation 3 of the Town and Country Planning General Regulations 1992, planning permission be **granted** subject to the following conditions:

- 1 The development hereby permitted shall be begun before the expiry of 5 years from the date of this permission.
- 2 The development hereby permitted shall be carried out in accordance with the details submitted by way of the application (dated 25 June 2014), together with the planning statement dated June 2014, the Design & Access Statement (dated June 2014), the statement of community involvement (dated June 2014), the

heritage statement (dated June 2014), the Staples Primary School travel plan – by Richard Jackson ref: 45654 (dated June 2014), the Transport Statement - by Richard Jackson ref 45654 (dated June 2014), the tree survey and arboricultural impact assessment report (dated May 2014), Ecological Assessment including a screening opinion with respect to the habitat regulations assessment process (dated May 2014), the biodiversity checklist dated 20 June 2014, Additional justification for the expansion of Staples Road Primary School dated 22 September 2014, Addendum to the Design & access statement and Heritage Statement dated September 2014 and drawing numbers:

- 45654/C/001 (rev B) 'Proposed Drainage Layout' dated 19 June 2014;
- 7533/A001 (rev PL) 'Location Plan' dated May 2014;
- 7533/A005 (rev PL) 'Existing Site Plan' dated June 2014;
- 7533/A035 (rev PL) 'Proposed Site Plan' dated May 2014;
- 7533/A036 (rev A) Proposed Detail Site Plan dated 4 July 2014
- 7533/A006 (rev PL) 'Existing Detail Site Plan' dated June 2014;
- 7533/A020 (rev PL) 'Existing Elevations' dated May 2014;
- 7533/A050 (rev B) 'Proposed Elevations' dated 19 Sept 2014
- 7533/A015 (rev PL) 'Existing Site Elevations photo montage' dated June 2014;
- 7533/A012 (rev PL) 'Existing Roof Plan' dated June 2014;
- 7533/A042 (rev PL) 'Proposed Roof Plan' dated 24 June 2014;
- 7533/A011 (rev PL) 'Existing Upper ground Floor Plan' dated June 2014;
- 7533/A041 (rev PL) 'Proposed Upper ground Floor Plan' dated May 2014;
- 7533/A010 (rev PL) 'Existing lower ground Floor Plan' dated June 2014;
- 7533/A040 (rev PL) 'Proposed lower ground Floor Plan' dated May 2014;
- 7533/A055 (rev PL) 'Proposed Sections' dated May 2014;
- 7533/A046 (rev PL) 'Playground Works Cross Sections' dated June 2014;

Together with the information contained in the following emails:

- Vincent & Gorbing, entitled 'RE: Staples Road- Extension Validation – Addendum' dated 04 July 2014
- Vincent & Gorbing, entitled 'RE: Staples Road- Extension Validation – Addendum'(including plan numbers A036 (Rev A) 'Proposed detail Site Plan' dated May 2014 and A050 (Rev A) 'Proposed elevations' dated May 2014) dated 11 July 2014;
- Vincent & Gorbing, entitled 'RE: Staples Road demolition application CC/EPF/36/14 and extension application CC/EPF/42/14' (including documents 'Exterior lighting ref PA662692 (dated 21 August 2014) and letter from Thames Water (dated 26 August 2014)) dated 27 August 2014.

Except as varied by the following conditions:

- 3 No development shall take place until details of the materials to be used for the external appearance of the building have been submitted to and approved in writing by the County Planning Authority. Without prejudice to the foregoing, the details shall include information demonstrating that the red plain tiles have been substituted for orange sand-faced brick tiles and large scale drawings to show an elevation of the diaper pattern and detailed drawings of no more than 1:20 scale of the eaves and windows. The development shall be implemented in accordance

with the approved details.

- 4 The development hereby permitted shall not be constructed unless during the following times:

07:00 to 18:30 hours Monday to Friday

07:00 to 13:00 hours Saturdays

and at no other times, including on Sundays, Bank or Public Holidays.

In addition, no construction traffic will be permitted to access the site between the hours of:

08:15 to 09:15 and 14:45 to 15:45 hours Monday to Friday

and at no other times, including on Sundays, Bank or Public Holidays.

- 5 No development shall take place until a construction management plan and appropriate plans have been submitted to and approved in writing by the County Planning Authority. The construction management plan shall include the following:
- a) Identifying the access to be used for the construction vehicles
 - b) Alternative emergency access arrangements for the duration of the construction period
 - c) The location of the contractors plant site, and measures to be incorporated to segregate it from the main school buildings and pupils.
- 6 No fixed lighting shall be erected or installed until details of the location, height, tilt, lighting controls, lighting design, illuminance levels, uniformities and spill light contour lines on to Ordnance Survey mapping has been submitted to and approved in writing by the County Planning Authority. The details shall include a design summary to ensure the lighting is designed to an appropriate lighting standard to allow children and adults safe passage around the school when there is poor visibility but would minimise the potential nuisance of light spillage on the local environment, adjoining properties and highways. The lighting shall thereafter be erected, installed and operated in accordance with the approved details.
- 7 No development shall take place until a detailed scheme to accommodate intercept and re-direct, all surface water drainage arising from the development hereby permitted has been submitted to and approved in writing by the County Planning Authority. The development shall be implemented in accordance with the approved scheme and maintained *for the development hereby permitted*.
- 8 No development shall take place (including ground works) until a construction environmental management plan (CEMP: Biodiversity) has been submitted to and approved in writing by the County Planning Authority. The CEMP: Biodiversity shall include the following:
- a) Risk assessment of potentially damaging construction activities;
 - b) Identification of biodiversity protection zones;
 - c) Practical measures (both physical measures and sensitive working

- practices) to avoid or reduce impacts during construction (may be provided as a set of method statements);
- d) The location and timing of sensitive works to avoid harm to biodiversity features;
 - e) The times during construction when specialist ecologists need to be present on site to oversee works;
 - f) Responsible persons and lines of communication;
 - g) The role and responsibilities on site of an ecological clerk of works or similarly competent person; and the
 - h) Use of protective fences, exclusion barriers and warning signs.

The approved CEMP: Biodiversity shall be implemented and adhered to throughout the construction period of the development hereby approved.

- 9 No removal of hedgerows, trees or shrubs shall take place between 1st March and 31st August inclusive, unless a competent ecologist has undertaken an ecological assessment to confirm that no birds would be harmed and/or appropriate measures are in place to protect nesting bird interest on site. Any such written confirmation or ecological assessment shall be submitted to the County Planning Authority for approval prior to any removal of hedgerows, trees or shrubs during this period.

Informative

Prior to the beneficial occupation of the development it is advised that an updated School Travel Plan including monitoring arrangements is prepared, in liaison with the Highway Authority, and subsequently implemented in full.

THE CONSERVATION OF HABITATS AND SPECIES REGULATIONS 2010

The proposed development would be located within distance to a European site (Epping Forest SAC/SPA) and would not be directly connected with or necessary for the management of that site for nature conservation.

Following consultation with Natural England and the County Council's Ecologist no issues have been raised to indicate that this development would adversely affect the integrity of the European site, either individually or in combination with other plans or projects.

Therefore, it is considered that an Appropriate Assessment under Regulation 61 of The Conservation of Habitats and Species Regulations 2010 is not required.

EQUALITIES IMPACT ASSESSMENT:

This report only concerns the determination of an application for planning permission. It does however take into account any equality implications. The recommendation has been made after consideration of the application and supporting documents, the development plan, government policy and guidance, representations and all other material planning considerations as detailed in the body of the report.

STATEMENT OF HOW THE LOCAL AUTHORITY HAS WORKED WITH THE APPLICANT IN A POSITIVE AND PROACTIVE MANNER

In determining this planning application, the Local Planning Authority has worked with the applicant in a positive and proactive manner based on seeking solutions to problems arising in relation to dealing with the planning application by liaising with consultees, respondents and the applicant/agent and discussing changes to the proposal where considered appropriate or necessary. This approach has been taken positively and proactively in accordance with the requirement in the NPPF, as set out in the Town and Country Planning (Development Management Procedure) (England) (Amendment No.2) Order 2012

LOCAL MEMBER NOTIFICATION

LOCAL MEMBER – EPPING FOREST – Loughton Central

BACKGROUND PAPERS

Consultation replies
Representations