

LONDON BOROUGH OF WALTHAM FOREST

Committee/Date:	Planning – 3 March 2026
Application reference:	251786
Applicant:	London Borough of Waltham Forest Council
Location:	Yardley Primary School, Hawkwood Crescent, Chingford, London, E4 7PH
Proposed development:	Demolition of existing canteen building and construction of part two storey, part three storey canteen and classroom building (Use Class F1). Associated works include new bin and bicycle/scooter storage facilities, photovoltaic panels, air source heat pumps (ASHP), electric vehicle charging points and hard and soft landscaping.
Wards affected:	Chingford Green
Appendices:	None

1. RECOMMENDATION

1.1 That full planning permission is GRANTED, subject to conditions and informatives and completion of a Unilateral Undertaking Legal Agreement (UU) with the following Heads of Terms:

Biodiversity Net Gain (BNG)

- To register the site on the Biodiversity Gain Site Register
- To complete the Habitat Creation and Enhancement Works at the application site in accordance with the Habitat Management and Monitoring Plan
- To provide Management Plan Monitoring Reports to the Council for either on-site provision or biodiversity off setting scheme
- To register the off-site habitat units with Natural England
- Financial contribution towards BNG monitoring, over periods including year 1, 2, 5, 10, 20 and 30 for either on-site provision or biodiversity off setting scheme.
- Any shortfall or failure to deliver 10% uplift on site, will require either of the following options to be taken up via either Biodiversity Offsetting scheme or statutory biodiversity credits.

Highways and Transportation

- Financial contribution of £750 for Construction Logistics Plan monitoring.

- Highway Condition survey. Any damage to the highways as a result of the construction works would be reinstated by the Council and funded by the developer.

Energy

- In the event that the 35% carbon reduction target has not been met, a financial contribution towards a carbon levy.
- "Second COF payment" required if not Zero Carbon at Post Construction stage.
- Be-Seen monitoring:
 - A. Within 8 weeks of the grant of planning permission, to submit to the GLA accurate and verified estimates of the 'Be Seen' energy performance indicators.
 - B. Prior to occupation, the Owner shall provide updated accurate and verified 'as-built' design estimates of the 'Be Seen' energy performance indicators for each Reportable Unit of the development.
 - C. Upon completion of the first year of Occupation or following the end of the Defects Liability Period (whichever is the later) and at least for the following four years after that date, the Owner is required to provide accurate and verified annual in-use energy performance data for all relevant indicators under each Reportable Unit of the development.
- In the event that the 'In-use stage' evidence submitted under Clause c) shows that the 'As-built stage' performance estimates derived from Clause b) have not been or are not being met, the Owner should investigate and identify the causes of underperformance and the potential mitigation measures and set these out in the relevant comment box of the 'Be Seen' in-use stage reporting webform. An action plan comprising measures identified in Clause c) shall be submitted to and approved in writing by the GLA, identifying measures which would be reasonably practicable to implement and a proposed timescale for implementation. The action plan and measures approved by the GLA should be implemented by the Owner as soon as reasonably practicable.)

Legal Fees

- Payment of the Council's legal fees for the preparation and completion of the Legal Agreement.

Monitoring and Implementation:

- Payment of 5% of the total amount of Unilateral Undertaking contributions towards monitoring, implementation and compliance of the legal agreement.

Minor Amendments

- 1.2 That authority to be given to the Assistant Director - Development Management and Building Control in consultation with the Council's Legal Services for the sealing of the Unilateral Undertaking and to agree any minor amendments to the conditions or the legal agreement on the terms set out above.

- 1.3 In the event that the Unilateral Undertaking is not completed within a reasonable timeframe following the date of Planning Committee, the Assistant Director - Development Management and Building Control is hereby authorised to refuse the application in consultation with the Chair of the Planning Committee. In the absence of this Unilateral Undertaking, the proposed development would not be able to deliver the development on the site. The implication of this happening is that financial and non-financial commitments would be lost, which otherwise would be secured by the Unilateral Undertaking.

2. REASONS REFERRED TO COMMITTEE

- 2.1 London Borough of Waltham Forest own the site, the Council are the applicant and the level of public interest expressed in the application.

3. SITE AND SURROUNDING AREA

- 3.1 The application site relates to Yardley Primary School which is located on an extensive parcel of land between Hawkwood Crescent and Yardley Lane in the north of the London Borough of Waltham Forest in the Chingford Green ward area.
- 3.2 The school site is bounded by Hawkwood Crescent to the south and Yardley Lane to the north and west. The school site is approximately 250 metres to the east of Sewardstone Road (A112).
- 3.3 The main point of vehicular access to the school site is from the south via Hawkwood Crescent with three pedestrian access points to the site also – 2no. from Hawkwood Crescent and 1no. from Yardley Lane.
- 3.4 To the north and east of the application site is the Epping Forest North Site of Importance to Nature Conservation (SINC) with Fairmead Park, a Park and Garden of Local Historic Interest located to the immediate east of the site. The area immediately to the north and east of the application site is also designated metropolitan green belt land.
- 3.5 The Yardley Primary School site contains the following buildings:
- Main school building;
 - Kitchen/dining block;
 - Reception/nursery unit associated with Yardley Primary School;
 - Private nursery unit; and
 - Caretakers dwellinghouse.
- 3.6 None of these buildings on site are locally or statutorily listed and the site is not within a conservation area.
- 3.7 The Yardley Primary School site has extensive soft landscaping, including many trees primarily located in the western portion of the site, north of the main building and the south-eastern edge of the school site. Between the main school

building and kitchen/dining block at the western part of the site is a hard landscaped play area including 3no. Multi-Use Games Areas (MUGAs).

- 3.8 Yardley Primary School is a 2-form entry primary school with 510 pupils (2025-2026 year) (450 pupils pre-2024) attending the school ranging from 3-11 in age. The school employs 65 staff.
- 3.9 21 vehicular parking spaces are provided within the school site. The school grounds are open 6.45am – 6pm each weekday.
- 3.10 The site sits within a mainly residential area comprising mostly two-storey semi-detached properties to the north, west and south of the school site. The school is situated within 200m of Epping Forest SAC and SSSI, with Hawkswood PRU School nearby.

4. APPLICATION PROPOSAL

- 4.1 The application proposal seeks to demolish the existing single storey kitchen/dining block and replace it with a part two-storey, part three-storey building accommodating new kitchen/dining facilities, classrooms, Learning Resource Centre (LRC), group rooms and ancillary facilities – see indicative CGI below (Figure 1).
- 4.2 This is to facilitate the expansion of the school from a two-form entry school to a three-form entry school raising the number of pupils at the school from 450 (pre-2024) to 630 pupils. 5 additional staff position will also be created by the development.
- 4.3 The development will result in the loss of 6 vehicle parking spaces but proposes the provision of two cycle/scooter stores accommodating a total of 16 cycle parking spaces and 10 scooter parking facilities across both stores. A new bin store is also provided.
- 4.4 The proposal seeks to maximise energy efficiency with the provision of roof level air source heat pumps and a photovoltaic panel array.
- 4.5 A ramped access from the multi-use games area will be provided due to the topographical level changes which will be softened by a high-quality soft landscaping scheme and the retention of all trees on site.



Figure 1: Indicative CGI from vehicular access route.

5. RELEVANT PLANNING HISTORY

- 5.1 On 18 July 2024, planning permission was granted for the construction of a single storey extension to the main school building and the erection of a scooter store (ref. 240808). This application created one additional classroom at the school to support the expansion of the school by an additional 1 form-entry (increasing from 2 form-entry to 3-form entry) in accordance with projected pupil number increases required by summer 2025. This extension has been completed along with the scooter store providing 22no. scooter parking spaces.
- 5.2 To facilitate further expansion of the school in line with projected increases in student numbers, a further increase in the capacity of the school is required. As such, the applicant worked with planning officers via a Planning Performance Agreement to work collaboratively towards a policy compliant scheme prior to the submission of this application.
- 5.3 This application is accompanied by a planning application for the construction of a single storey detached modular building to provide temporary kitchen located on an area of the school playing field adjacent to the main building (ref. 252932). This is for a temporary consent to allow kitchen and dining facilities to be provided at the school should this application be granted.

6. CONSULTATION

- 6.1 Prior to the submission of the application, the applicant team engaged with the local community through a community consultation event on 26 June 2025 (morning, afternoon and evening sessions held). A total of 461 properties were notified of the event. The event comprised presentation of the proposed development on boards and the provision of feedback forms.
- 6.2 Over 100 members of the public attended the event with written feedback provided from 17 members of the public.

- 6.3 The Statement of Community Involvement states that most participants were supportive of the school expansion in principle. However, concerns were raised regarding increased traffic (both during construction and post-development), parking stress, lack of enforcement of existing and possible future poor parking practices, new parking restrictions on Yardley Lane, noise, impacts on bus routes during peak times, and where new pupils would be travelling from.
- 6.4 Upon validation of this planning application, the Council circulated consultation letters to the following local properties:
- Yardley Lane, Chingford – No’s 2-14 (even), 15, 16, 16a, 17-27, 27 (Flats 1-3), 28-47, 47a, 48, 49, 49a, 50-62, 63-71 (odd) and 66 (Monkey Puzzle Day Nursery; and Hawkwood Lodge Field Study Centre).
 - Hawkwood Crescent, Chingford – No’s 1-103, 105-111, 113 (St Francis Church and Hall), 115 (Hawkwood Plant Nursery), 115 (The Managers House, Hawkwood Plant Nursery), Yardley Childrens Centre, Yardley Primary School, and School House, Yardley School.
 - Yardley Close, Chingford – No’s 1-2 and 13-14.
 - Epping Glade, Chingford – No’s 11-14 and 16-18.
 - Antlers Hill, Chingford – No’s 2, 4, Hawkswood Hostel, School Bungalow Hawkswood Primary School, Hawkswood Primary School, and Hawkswood Therapeutic School.
 - Sewardstone Road, Chingford – No’s 214-218 (even).
 - Drysdale Avenue, Chingford – No’s 123-129 (odd) and 130-144 (even).
- 6.5 The application was advertised via site notice on 29 July 2025 and was erected at the site shortly after.
- 6.6 A press notice, dated 31 July 2025, also notified the public about the application and the ability to make representations.
- 6.7 The Council received 5no. public representations in response to the public consultation.
- 6.8 All 5no. representations were in objection to the proposed development. These matters, and those raised in the pre-submission public consultation event, are summarised in the table below and addressed within the assessment section of this report.

Representation	Officer Response
Construction – noise and traffic disruption	Noise impacts are comprehensively considered under Section 9D below. Construction traffic impacts are considered under Section 9F below. Pre-commencement conditions are recommended relating to Construction Logistics Plans and Construction

	<p>Environmental Management Plans to allow a full assessment and to secure mitigation of traffic and noise impacts during construction.</p>
<p>Environmental considerations – litter, air pollution and light pollution</p>	<p>Littering by staff and pupils is not a material planning consideration. The onus of littering enforcement lies with the Council's Environmental Enforcement Officers. Should this be a recurring issue or arise following development, residents are encouraged to report such activities accordingly.</p> <p>Light pollution both during construction and post-development is comprehensively considered under Sections 9D below and will be managed through planning conditions.</p> <p>Air pollution is considered comprehensively under Sections 9H below. Air pollution will be managed via planning conditions.</p>
<p>Parking stress (including lack of reference to Yardley Lanes new parking restrictions) and unauthorised parking practices</p>	<p>Parking in restricted zones including on double yellow lines and obstructing driveways are a matter for parking enforcement. Existing illegal parking and any future parking should be reported to the competent authority. Details in reporting illegal parking can be found at the link below: https://www.walthamforest.gov.uk/parking-roads-and-travel/car-parks-and-street-parking/request-parking-enforcement</p> <p>The impact of the development of parking stress is comprehensively considered under Section 9F below.</p>
<p>Impacts to bus services/network</p>	<p>The Transport Assessment estimates an additional 9 bus trips by pupils by 2029 when the expansion is complete, based on the current modal split; this is not considered to have a material impact.</p>
<p>Clarification of staff numbers and details of the nursery expansion</p>	<p>The nursery expansion does not form part of the development. It has however been referenced in the Transport Assessment</p>

	<p>as a consideration and part of the local context in transport impacts associated with the development.</p> <p>Clarification was provided regarding staff number increases which is that when the development initially opens, staff numbers will increase from 65 to 66 but once the full expansion until 2029 occurs, staff numbers will increase to 70 (an increase of 5 staff members in total).</p>
Traffic Impacts	This is comprehensively considered under Section 9F below. It concludes that the development would not result in additional traffic that would significantly impact road safety or prejudice highway flows.
Where new pupils will come from	Admission to the school will be determined with regards to the Waltham Forest Council Admission Arrangements Guidance.

6.9 OTHER CONSULTATIONS

Consultee	Response
Place & Design	No objection subject to conditions
Highways	<p>No objection subject to conditions and securing planning obligations via legal agreement.</p> <p><u>Conditions:</u></p> <ul style="list-style-type: none"> - Detailed CLP <p><u>Planning Obligations:</u></p> <ul style="list-style-type: none"> - £750 towards CLP monitoring - Pre and post construction highway condition survey <p>No objection regarding drainage and flooding. Sufficient detail has been provided to not require a SUDS planning condition.</p>
Tree & Urban Greening Officer	No objection subject to conditions
Sustainability & Energy	No objection
Schools (Council)	No comments received
Environmental Health (Air Quality)	No objection subject to conditions

Metropolitan Police Service	No objection subject to conditions as clarification is required to achieve SBD Certification.
Waste & Recycling	No comments received
Transport Policy	No comments received
London Fire Brigade	No comments received
Thames Water	No objection subject to conditions and informatives
Environment Agency	No comments received

7. DEVELOPMENT PLAN

The London Plan (2021)

7.1 On Tuesday 2nd March 2021, The Mayor of London published the replacement London Plan. From this date it forms part of the Development Plan for the purpose of determining planning applications. The 2021 London Plan supersedes the 2016 London Plan, which no longer has any effect. The relevant policies within the London Plan 2021 are:

- Policy D4: Delivering Good Design
- Policy D5: Inclusive Design
- Policy D11: Safety, Security and Resilience to Emergency
- Policy D12: Fire Safety
- Policy D13: Agent of Change
- Policy D14: Noise
- Policy S1: Developing London's Social Infrastructure
- Policy S3: Education and Childcare Facilities
- Policy G1: Green Infrastructure
- Policy G5: Urban Greening
- Policy G6: Biodiversity and Access to Nature
- Policy G7: Trees and Woodlands
- Policy SI1: Improving Air Quality
- Policy SI2: Minimising Greenhouse Gas Emissions
- Policy SI5: Water Infrastructure
- Policy SI12: Flood Risk Management
- Policy SI13: Sustainable Drainage
- Policy T1: Strategic Approach to Transport
- Policy T3: Transport Capacity, Connectivity and Safeguarding
- Policy T4: Assessing and Mitigating Transport Impacts
- Policy T5: Cycling
- Policy T7: Deliveries, Servicing and Construction

Shaping the Borough – Waltham Forest Local Plan LP1 (2024)

7.2 The draft version of the Local Plan underwent Regulation 18 public consultation between July 2019 and September 2019 and consultation on the proposed

submission version between 26 October 2020 and 14 December 2020. It underwent examination and consultation on proposed modifications concluded on 21 September 2023. The Waltham Forest Local Plan (LP1) was subsequently adopted 29 February 2024 and therefore now forms a key part of the development plan in determining all planning applications. The previous Core Strategy (2012) and Development Management Policies (2013) are superseded by LP1. The relevant policies are:

- Policy 1: Presumption in Favour of Sustainable Development
- Policy 3: Infrastructure for Growth
- Policy 5: Management of Growth
- Policy 6: Ensuring Good Growth
- Policy 11: North Waltham Forest
- Policy 46: Social and Community Infrastructure
- Policy 47: Education and Childcare Facilities
- Policy 48: Promoting Healthy Communities
- Policy 50: Noise, Vibration and Light Pollution
- Policy 53: Delivering High Quality Design
- Policy 57: Amenity
- Policy 58: Making Places Safer and Designing Out Crime
- Policy 60: Promoting Sustainable Transport
- Policy 61: Active Travel
- Policy 62: Public Transport
- Policy 63: Development and Transport Impacts
- Policy 64: Deliveries, Freight and Servicing
- Policy 65: Construction Logistic Plans
- Policy 66: Managing Vehicle Traffic
- Policy 68: Utilities Infrastructure
- Policy 77: Green Infrastructure and the Natural Environment
- Policy 79: Biodiversity and Geodiversity
- Policy 80: Trees
- Policy 81: Epping Forest and the Epping Forest Special Area of Conservation
- Policy 85: A Zero Carbon Borough
- Policy 87: Sustainable Design and Construction
- Policy 88: Air Pollution
- Policy 89: Water Quality and Water Resources
- Policy 91: Managing Flood Risk
- Policy 93: Waste Management

8. OTHER MATERIAL CONSIDERATIONS

National Planning Policy Framework (2024)

- 8.1 The National Planning Policy Framework (NPPF) sets out the government's planning policies for England and how these are expected to be applied. It is a material consideration in planning decisions. It contains a presumption in favour of sustainable development, described as at the heart of the Framework.

- 8.2 For decision-taking the NPPF states that the presumption means "approving development proposals that accord with an up-to-date development plan without delay" and where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless 'any adverse impacts would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'.
- 8.3 The NPPF gives a centrality to design policies; homes should be locally led, well-designed, and of a consistent and high-quality standard. Local planning authorities (LPAs) are to make sure that the quality of approved developments does not materially diminish 'between permission and completion, as a result of changes being made to the permitted schemes.'
- 8.4 The specific policy areas of the NPPF considered to be most relevant to the assessment of this application are as follows:
- Achieving Sustainable Development
 - Decision-Making
 - Promoting Healthy and Safe Communities
 - Promoting Sustainable Transport
 - Making Effective Use of Land
 - Achieving Well-Designed Places
 - Meeting the Challenge of Climate Change, Flooding and Coastal Change
 - Conserving and Enhancing the Natural Environment

Other Policies

- London Plan – Supplementary Planning Guidance – Social Infrastructure (2016)
- London Borough of Waltham Forest Design Charter for Schools – 10 Principles for Well-Designed Schools (2018)
- Department for Education – Area Guidelines for Mainstream Schools – Building Bulletin 103 (June 2014)
- Revised Waltham Forest Planning Obligations Supplementary Planning Document (2017)
- NPPF Amendments December 2025. The government published an amended NPPF for consultation. However, this is subject to change and has very little weight in this decision.

Local Finance Considerations

- 8.5 Local Finance Considerations are a material consideration in the determination of all planning applications. Local Finance Considerations can include either a grant that has been or would be given to the Council from central government or money that the council has received or will or could receive in terms of Community Infrastructure (CIL)

8.6 The Council has not received and does not expect to receive any income from Mayoral CIL in relation to this development.

9. ASSESSMENT

9.1 The main issues for consideration in relation to the proposed development are as follows:

- A. Principle of Development
- B. Urban Design
- C. Quality of Facilities
- D. Amenity – Neighbouring Occupiers
- E. Biodiversity and Trees
- F. Highways, Traffic Management and Parking
- G. Waste Management
- H. Environment & Sustainability

A. Principle of Development

9.2 Section 14 of Education Act 1996 (Functions in respect of provision of primary and secondary schools) requires the local authority to provide sufficient school places for resident children, including early years' provision. This duty requires the Council to forecast future pupil populations so that it can ensure that sufficient places are provided.

9.3 The Council's Infrastructure Delivery Plan's (2024) projections for reception numbers forecast growth in the north of the Borough with Yardley Primary School earmarked to accommodate this forecasted growth via a one form entry expansion.

9.4 Paragraph 100 of the National Planning Policy Framework (2024) operationalises the Council's statutory requirement to provide sufficient school places stating that Local Planning Authorities (LPA) should take a proactive, positive and collaborative approach to development that will ensure that a sufficient choice of school places is available to meet the needs of existing and new communities through expansions. Great weight should be given to the need to expand schools, when determining applications.

9.5 Policy S1 of the London Plan (2021) states that social infrastructure development proposals should be high quality and inclusive that addresses a local or strategic need. This is reflected in Policy S3 of the London Plan (2021) and Policies 3 and 47 of the adopted Waltham Forest Local Plan LP1 (2024).

9.6 Waltham Forest's Pupil Place Plan 2021-2036 outlines the forecast needs for the next 15 years and the aim to hold the surplus of places between 3-5% to enable inward migration and offer parental preference whilst also aiming to protect schools from financial vulnerability. A survey of parental reference of Yardley Primary School identifies that it is oversubscribed by 143% (approximately 1 form entry).

- 9.7 Yardley Primary School is located within the area of highest demand for school places within the Borough and so there is an identified need for the development as set out within the Infrastructure Delivery Plan (2024). The development will help deliver sustainable development in accordance with the NPPF (2024) and ensure good growth in accordance with Policy 6 of the adopted Waltham Forest Local Plan LP1 (2024). It will also contribute towards the corporate aim of the Council to achieve a 15-minute neighbourhood.
- 9.8 Moreover, with an increased focus on wraparound care from the Department for Education as set out within the 'Wraparound Childcare: Guidance for Schools and Trusts in England (February 2024)' there is a growing need for breakfast and afterschool provision to help parents and carers balance work and family responsibilities and ensuring children receive quality early education and care. The enhanced kitchen/dining facilities will assist in the potential to deliver these benefits for the Council's residents.
- 9.9 The principle of development is therefore supported in accordance with the NPPF (2024), Policies S1 and S3 of the London Plan (2021), Policies 1, 3, 6, 46 and 47 of the adopted Waltham Forest Local Plan LP1 (2024) and the London Borough of Waltham Forest Design Charter for Schools – 10 Principles for Well-Designed Schools (2018).

B. Urban Design

- 9.10 Policy 53 of the adopted Waltham Forest Local Plan LP1 (2024) seeks to ensure developments are a high quality and enhance local character in relation to the architectural integrity of the existing building and the surrounding area.
- 9.11 The policy requirements of Policy 53 are reflected within the London Borough of Waltham Forest Design Charter for Schools – 10 Principles for Well-Designed Schools (2018) with proposals required to make effective and the best use of the site while responding to site characteristics.
- 9.12 The development seeks to replace a building of poor architectural quality (see Figure 2 below) and somewhat worn appearance with a new school building comprising both canteen/kitchen facilities in addition to learning environments at first floor level. The new building is located on the site of the existing kitchen block and so its positioning within the site is appropriate and achieves the best and most effective use of the site without impacting negatively on play spaces and biodiverse areas of the wider school site in accordance with Policy 53 and the London Borough of Waltham Forest Design Charter for Schools – 10 Principles for Well-Designed Schools (2018).



Figure 2: Existing kitchen/dining building to be demolished

- 9.13 It is acknowledged that the footprint, scale and bulk of the new building would be greater than that of the existing kitchen/dining block in that the scale increases from single storey to 2-3 storeys and the footprint at ground floor level increases from 292sqm to 937sqm. However, officers note that the maximum height of the building (12m) would be less than that existing (13.3m) whilst recognising the maximum height of the existing building is due to an extended chimney. Nonetheless, the positioning of the development to the rear of properties on Hawkwood Crescent whilst being surrounded by dense, mature vegetation means the new building would be largely imperceptible from the public streetscapes surrounding the site.
- 9.14 Whilst being three storey in scale in an area defined by a two-storey residential context, the use of the uppermost storey for plant only and the civic nature of the building mean this minor increase in scale and bulk is appropriate and assists in allowing the building to be clearly identifiable as a school in accordance with the London Borough of Waltham Forest Design Charter for Schools – 10 Principles for Well-Designed Schools (2018).
- 9.15 In terms of materiality, Policy 53 requires developments to use high quality materials and detailing that are attractive, durable and sustainable.
- 9.16 The ground floor of the new building will be clad in red brick reflecting the material palette of the original school building, external wall finishes of residential properties on Hawkwood Crescent and the colour of roofs in the surrounding area. The use of red brick creates a visual link and more cohesive material palette across the school site.

- 9.17 At first floor level, green fibre cement cladding is proposed which provides a visual cue to the school's colours. At second floor level, a lighter coloured cladding will be used to enclose the plant area. The green colour also allows the building to settle effortlessly into its surrounding environment, which is heavily vegetated and open, reduce its visual bulk and further justifies its three-storey scale in an otherwise two-storey context. Windows and door frames will be finished in a durable powder coated aluminium.
- 9.18 The combination of these material palettes provides visual cues to the site's context whilst expressing it as a modern addition to a civic site and ensures materials are durable for long term sustainability. However, the material of the upper floor is not specified nor are the soffit external finishes provided. These matters will be secured by planning condition to ensure a high-quality material finish.
- 9.19 High quality design also involves responding to existing trees and landscaping whilst providing a high-quality level of landscaping in accordance with Policy 53 of the adopted Waltham Forest Local Plan LP1 (2024). The development responds to its natural and topographical constraints through the positioning of the new building and provision of retaining walls ensuring the retention of all trees surrounding the site supported by a high quality landscaping scheme including ornamental planting, tree planting, rain garden, wildflower meadow grass planting, reinforced grass paving, and contrasting paving along paths and perimeter of the building in accordance with Policy 53. A full assessment of the landscaping scheme is provided in Section E below.
- 9.20 Developments should be inclusively designed in accordance with Policy D5 of the London Plan (2021) and Policies 47 and 53 of the adopted Waltham Forest Local Plan LP1 (2024). Whilst responding to the site's topographical constraints, a ramped entrance has been provided to the new building ensuring inclusive access for those with mobility issues. Moreover, tactile paving is proposed at external steps for those with visual impairments. Ramped and stepped areas are also paved in contrasting paving to the predominant paving colour to demarcate and differentiate these areas. Internally, level access is provided to the ground floor with a lift provided to provide access to upper floors for those with mobility impairments. Overall, the development is considered to be inclusively and accessibly designed in accordance with Policy D5 of the London Plan (2021) and Policies 47 and 53 of the adopted Waltham Forest Local Plan LP1 (2024).
- 9.21 The main entrance to the building will be on its eastern and southern elevations to facilitate connection between the main school building, multi-use games area, car park and the new building. This also aligns with the termination of the stepped path and ramped routes to the building. The entrances are emphasised through the use of canopies, double door openings, and green glazed bricks (tying in with the first-floor façade) to create a legible and welcoming entrance.
- 9.22 Plant and the PV panels located on the roof of the new building will be enclosed by a c.1.13m tall parapet meaning much of the rooflights and plant (pipework, condensers, ductwork, and ventilation) will not be visible from ground level. PV

panels will also be located on top of the plant rooms on the second floor which would be more visually prominent than those above the first floor given the parapet. These would protrude c.0.25m above the roofscape. This is considered to be an insignificant protrusion and given the sequestered nature of the building within the site, it would not result in significant visual amenity concerns.

- 9.23 The new bin enclosure is to replace the original location for bin storage. The new enclosure is proposed to be closer to the vehicle entrance and is approximately 4.7m deep x 7.5m wide with double doors at the front. It will be proprietary timber fencing on a metal frame measuring 1.5m high. This limited height and scale, timber fencing to match boundary fencing immediately to its south and positioning away from the public views on the streetscape will allow the bin store to discreetly integrate into the school grounds. It therefore does not raise any visual amenity concerns.
- 9.24 Two cycle and scooter stores are located along the southern side of the site. These will provide sheltered locations for the parking of 10no. scooters and 16no. bicycles. Their positioning along the southern boundary of the site next to the multi-use games area is convenient as this is central to those accessing the site via the main vehicular/pedestrian access on Hawkwood Crescent and Yardley Lane. Its positioning along the southern boundary of the site away from public viewpoints and modest scale measuring a maximum height of 2.15m allows them to appear discreet within the local context. The structures will be durable comprising of metal frames set on a concrete pad and will be secure being enclosed with a fence and gate.
- 9.25 Overall in design terms, the development represents a high quality design that responds appropriately to its site constraints and takes visual cues from the wider local character and its setting whilst ensuring an accessible and inclusive environment is created in accordance with Policy D4 and D5 of the London Plan (2021), Local Plan Policies 47 and 53, and the London Borough of Waltham Forest Design Charter for Schools – 10 Principles for Well-Designed Schools (2018).

C. Quality of Facilities

(i) *Internal Learning Environment*

- 9.26 The Department for Education provide guidelines on space standards for schools under the Area Guidelines for Mainstream Schools – Building Bulletin 103 (June 2014). In applying these guidelines, a classroom for Key Stage 2 children (new classrooms within the building will be for Year 6 pupils as confirmed within submission documents) is required to have a gross internal area of 55sqm is required for up to 30 pupils.
- 9.27 The proposed classrooms range from 54.85sqm-55.36sqm with classrooms 1 and 2 falling short of the 55sqm standard. However, officers note that the respective shortfalls against these standards of 0.15sqm and 0.07sqm are only

marginal and given the functional, uniform shape of these classrooms, the shortfalls would not deem these classrooms as unusable.

- 9.28 A key element of the scheme is the improvement of kitchen and dining facilities at the school. Adopting the guidelines set out under the Area Guidelines for Mainstream Schools – Building Bulletin 103 (June 2014), halls/dining and PE spaces should achieve a minimum of 378sqm. At 409.46sqm, the existing hall and new dining hall complies with this minimum standard.
- 9.29 Adopting the guidelines set out under the Area Guidelines for Mainstream Schools – Building Bulletin 103 (June 2014), a library/learning resource centre for 630 pupils should be a minimum of 40.5sqm. At 54.59sqm, the LRC proposed within the new building complies with this. More broadly, learning resource areas (which includes IT rooms, group rooms and SENCO), for 630 pupils should provide a minimum of 94.5sqm overall within the school. With the existing IT room, group room and SENCO alongside the new group rooms and LRC, a total of 159.24sqm learning resource areas will be provided in total in accordance with these guidelines. Compliance with the required 126sqm of staff/administration spaces is also achieved.
- 9.30 The school site would fall short to provide adequate storage for its use falling c.44.5sqm short of the requirement to provide 157.5sqm storage. However, the constrained nature of the site means that if a larger building was proposed it would have negative impacts on the ability to achieve both policy-based and legislative environmental requirements such as the protection of trees and the ability to achieve biodiversity net gain notwithstanding the potential impact on external play spaces. Moreover, the application of these standards is to both the new building and older main school building which was constructed prior to these spatial guidelines meaning shortfalls against these standards are to be expected. Finally, officers emphasise that these standards are guidance only and flexibility can be applied to their application, as in this case. It is not expected that the shortfall in storage space would reduce or inhibit the functionality of the school with the current buildings failing these guidelines to an even greater degree. As such, the development would be a tangible improvement to the learning environment for pupils.

(ii) *Thermal Comfort*

- 9.31 Policy SI4 of the London Plan (2021), Policy 92 of the adopted Waltham Forest Local Plan LP1 (2024) and London Borough of Waltham Forest Design Charter for Schools – 10 Principles for Well-Designed Schools (2018) require developments to avoid exacerbation of the urban heat island effect and provide thermally comfortable environments. Reliance on air conditioning systems should also be avoided.
- 9.32 The application is accompanied by a '*Thermal Comfort and Energy Report Incorporating Net Zero Statement and Daylight Calculations*'. This demonstrates that the internal environment will be sufficiently ventilated and mitigates the risk of overheating through the use of natural ventilation through the opening of windows and the use of mechanical heat recovery units. This is

an energy efficient alternative to traditional air conditioning methods. The Sustainability & Energy Team have reviewed the documents provided and raised no objections to the information provided.

- 9.33 Officers are therefore content that overheating will be suitably mitigated, and a thermally comfortable internal environment will be achieved in accordance with Policy SI4 of the London Plan (2021), Policy 92 of the adopted Waltham Forest Local Plan LP1 (2024) and London Borough of Waltham Forest Design Charter for Schools – 10 Principles for Well-Designed Schools (2018).

(iii) Play Spaces

- 9.34 The development does not encroach upon the external play spaces of the existing school site. As a result, the development will not result in any loss of external play spaces. Whilst the increase in pupil numbers that will be delivered under the proposal will put additional pressure on the existing play spaces which includes a playing field and multi-use games area, the external play facilities are considered appropriate noting the constraints of the site within an urban environment.
- 9.35 The development has the potential to impact external play areas. However, the construction methods to be adopted have not yet been confirmed. As such, a condition requiring a detailed Construction Logistics Plan will allow officers to fully understand and assess the impact of construction on the schools external play areas.

(iv) Secure by Design

- 9.36 Policy D11 of the London Plan (2021) set out policy which requires all new developments to design out crime and incorporate an acceptable level of safety and security measures and ensure development is resilient to emergency.
- 9.37 Policy 58 of the Waltham Forest Local Plan LP1 (2024) set out requiring all major development to seek to achieve for Secured By Design accreditation via the Secured by Design scheme.
- 9.38 The development seeks to maximise security of the site being located within the already secure school grounds with the new building surrounded by secure fencing and gating to the north, east and south elevations. Other security measures proposed include low level lighting to the buildings' façade. CCTV, alarms, and secure locks to windows and doors.
- 9.39 In order to secure compliance, a Secure by Design condition will be imposed subject to planning approval to mitigate and secure necessary mitigations and deliver a secure, safe environment for all users of the proposed development in accordance with Policy D11 of the London Plan (2021) and Policy 58 of the Waltham Forest Local Plan LP1 (2024).

D. Amenity – Neighbouring Occupiers

9.40 This section assessed the residential amenity impact on neighbouring residential occupiers, specifically at the following addresses:

- No's 39-57 (odd) Yardley Lane ("a" on Figure 3 below)
- No's 56-62 (even) Yardley Lane ("b" on Figure 3 below)
- No's 37-61 (odd) Hawkwood Crescent ("c" on Figure 3 below).



Figure 3: Sensitive Neighbouring Receptors

(i) Overshadowing, Daylight/Sunlight & Outlook

9.41 Policy 57 of the adopted Waltham Forest Local Plan LP1 (2024) seeks to maintain the amenity of occupiers of neighbouring properties in terms of daylight/sunlight and outlook.

9.42 Generous separation distances are observed between the new building and the closest residential receptors:

- Rear elevations of properties on Hawkwood Crescent – c.36m to the south.
- Front elevations of properties on Yardley Lane – c.48m to the north.
- Rear and side elevations of properties on Yardley Lane – c.50m to the west.

9.43 Given these ample separation distances, the new school building would not present any undue overshadowing, loss of daylight/sunlight or loss of outlook to neighbouring residential receptors in accordance with Policy 57.

(ii) Privacy and Overlooking

- 9.44 Policy 57 of the adopted Waltham Forest Local Plan LP1 (2024) seeks to maintain the amenity of occupiers of neighbouring properties in terms of privacy.
- 9.45 Whilst the new building would largely mimic the positioning of the existing dining block, the development would appear taller than the existing building and introduce several windows at ground and first floor that would present an opportunity for some overlooking and perceived loss of privacy to the occupiers of properties on Hawkwood Crescent.
- 9.46 However, given that the new building is sited well within the school grounds with generous separation distances maintained from the closest residential receptors (minimum c.36m), the presence of intervening development and vegetation to properties to the north and west, and the daytime use of the school building (except for on rare occasions for open nights for example), the tangible and perceived loss of privacy to these occupiers is not considered to be significant to result in an unacceptable living environment to local residents.

(iii) Noise

- 9.47 Policies 50 and 57 of the Waltham Forest Local Plan LP1 (2024) seek to minimise noise pollution by ensuring that operational noise does not adversely affect neighbours, particularly noise sensitive land uses such as residential. Policy 50 also requires regard to be made to the 'Agent of Change' principle set out in Policy D13 of the London Plan (2021) and Policy D14 'Noise' of the London Plan (2021).
- 9.48 Noise sensitive receptors were identified as residential properties on Yardley Lane and Hawkwood Crescent. A baseline sound survey was conducted which was defined by playground activities with occasional road traffic, noise from gardens and wildlife.
- 9.49 The application does not seek to introduce an alternative use to that existing and involves an intensification of the existing use of the site as an educational facility falling under use class F1(a). The additional activity associated with the development will be confined to operational times of the school and therefore will be outside noise-sensitive hours (23:00-07:00). Given the existing nature of the sites use as a school and the lack of night time use of the site, officers consider that the intensification of the sites use would not in itself result in a noise nuisance to neighbouring sensitive receptors.
- 9.50 However, it is noted that the development will introduce additional plant which requires assessment in terms of their noise impact.
- 9.51 A Noise Impact Assessment assessing the operational phase noise impacts of mechanical plant and design has been submitted with the application. The current school site is operational on weekdays between 0700-1900 hours during which all new plant and machinery may operate. Proposed plant include:
- 4no. Air Source Heat Pumps with condensers on the roof of the new building;

- 3no. Floor Mounted Direct Expansion (DX) heat recovery units on the roof of the new building;
- Ventilation to the Learning Resource Centre on the roof of the new building;
- Kitchen supply and extract ventilation air handling units at roof level.

9.52 The Noise Impact Assessment has been conducted on the basis that DX units and ventilation plant may be used 24-hours a day whilst there would be no night time usage of the ASHPs and kitchen extraction systems. 2.4m tall acoustic screens enclose the ASHPs to mitigate noise creep.

9.53 The Noise Impact Assessment concludes that *'it is expected that the development sound would be unnoticeable. If it remains possible for the sound to be audible, then it is not expected to cause any change in behaviour or attitude. The development could marginally affect the acoustic character of the area but not to the extent that there could a perceived change in quality of life.'*

9.54 However, the assessment has been conducted without technical sound data for the kitchen extraction system as a model is yet to be confirmed. As such, officers recommend a condition be attached to any forthcoming planning consent requiring the submission of noise data for the kitchen extract system in order to fully assess the noise impact.

9.55 With the use of the abovementioned planning condition, officers consider that the noise impacts of the proposal would not result in undue harm to neighbouring sensitive receptors in accordance with Policies 50 and 57 of the adopted Waltham Forest Local Plan LP1 (2024) and Policies D13 and D14 of the London Plan (2021).

(iv) Light Pollution

9.56 Policy 50 of the Waltham Forest Local Plan LP1 (2024) seeks to minimise light pollution on sensitive neighbouring occupiers.

9.57 Lighting associated with construction will be controlled via the Construction Environmental Management Plan (CEMP). This will ensure that there would not be undue light pollution during construction on neighbouring sensitive receptors.

9.58 Lighting associated with the new building once operational include bollard lighting within the footpaths and car park and also on the external façade of the new building.

9.59 Whilst it is noted that lighting specification sheets have been provided for the wall-mounted lighting, officers note that no specification sheets have been provided for the bollards. Officers therefore recommend a planning condition for the submission of a detailed lighting strategy in order to fully assess light pollution and its potential impact on neighbouring sensitive receptors in accordance with Policy 50.

E. Biodiversity & Trees

(i) *Biodiversity Net Gain*

- 9.60 Policy G6 of the London Plan (2021) and Policy 79 of the adopted Waltham Forest Local Plan LP1 (2024) require new developments to aim to secure Biodiversity Net Gain (BNG). However, with the introduction of 10% BNG requirements for new developments under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021), developments are now legally required to secure a minimum of 10% BNG.
- 9.61 There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These are listed in paragraph 17 of Schedule 7A of the Town and Country Planning Act 1990 and the Biodiversity Gain Requirements (Exemptions) Regulations 2024.
- 9.62 Based on the submissions provided with this application it is considered the proposal under consideration requires the approval of a biodiversity gain plan before development is begun because none of the statutory exemptions or transitional arrangements listed are considered to apply.
- 9.63 The submitted Biodiversity Net Gain Assessment states that the development would result in a net gain of 11.33% habitat units (on-site), 25.77% hedgerow units (on-site) and 93% habitat units (off-site) through the provision of tree and shrub planting, green roofs, and rain gardens. Officers note that the additional off-site habitat units were required to satisfy the trading rules of BNG related to habitat type in order to comply with the statutory requirements.
- 9.64 As the development demonstrates that it can achieve 10% biodiversity gain through both on and off site credits, a planning condition will be attached to forthcoming consent requiring the submission of Biodiversity Gain Plan and Habitat Monitoring and Management Plan (HMMP), to demonstrate how the net gain would be achieved and managed over required 30-year period. The management and monitoring of the proposed BNG plans would be secured via Unilateral Undertaking. The off-site habitat units will need to be registered with Natural England and monitoring of such units to be conducted by the Council.
- 9.65 The responsibility to ensure compliance with the approved BNG plan lies with the Local Planning Authority, with requirement to incrementally monitor this over total 30 years period (end year 1, 2, 5,10, 20 and 30). To facilitate the monitoring role, a financial contribution would be secured via Unilateral Undertaking.

(ii) *Arboricultural Constraints*

- 9.66 Trees make an important contribution to the character and quality of urban environments and can help mitigate and adapt to climate change. Trees also play an important role within the urban environment by helping to trap pollutants, adding amenity value, providing shade, absorbing rainwater, filtering noise and providing areas of habitat for wildlife.

- 9.67 Paragraph 136 of the NPPF (2024), Policy G7 of the London Plan (2021) and Policies 53, 79 and 80 require developments to contribute to and enhance the natural environment by recognising the abovementioned value of trees. Existing trees of value should therefore be retained where possible.
- 9.68 The arboricultural impact assessment (AIA) has identified the constraints in relation to trees on and adjacent to the site. The existing site comprises many trees with the existing kitchen/canteen building particularly constrained being surrounded by trees on its southern, eastern and western boundaries. There is also a woodland immediately north of the existing building outside the application site. The trees immediately adjacent the development are mostly Category C trees but two are Category B trees (T27 and T30).
- 9.69 The positioning of the building and associated works has been carefully considered in relation to trees with a retaining wall proposed to provide level access to the building to avoid existing trees root protection areas. No trees are marked for removal though facilitation pruning is required for five trees to allow for construction access. Whilst the initial pruning work would be minimal, the AIA acknowledges that the five trees would need to be regularly maintained in a similar way to prevent conflict with the proposed building. The AIA states that this would not 'significantly exceed' the current management of the trees.
- 9.70 The AIA incorporates a generic method statement and draft tree protection plan that set out how the trees would be protected during demolition and construction activities. Moreover, the Outline Drainage Strategy identifies that a new sewer connection will be required with existing pipe removals within the root protection areas of trees.
- 9.71 During the course of the application, a new rain garden was proposed to the west of the proposed building within the root protection areas of 2 trees – T29 (Leyland Cypress) and T30 (Wild Cherry). An addendum Arboricultural Report was submitted regarding the introduction of the rain garden which adequately demonstrates a low potential impact on these trees subject to the adoption of tree protection measures and methodologies during construction. These would be secured by a planning condition.
- 9.72 Notwithstanding, as the submitted method statement is generic and there is a potential need for excavation to provide drainage infrastructure, officers, upon advice received by the Tree & Urban Greening Officer, recommend that a condition be attached to secure a detailed Arboricultural Method Statement in the event of approval to secure mitigation measures trees in accordance with the NPPF (2024), Policy G7 of the London Plan (2021) and Policies 53, 79 and 80 of the adopted Waltham Forest Local Plan (2024). Such details to be contained therein include protection measures, foundation design, root barriers and any other steps required to ensure the protection of the trees on and adjacent to the site.

(iii) *Ecological Impacts and Appropriate Assessment*

- 9.73 Epping Forest is London's largest open space, covering 2,400 hectares. Within it is the Epping Forest Special Area of Conservation and Sites of Special Scientific Interest, covering 1,600 hectares. A Special Area of Conservation is a European designation given to areas of exceptional ecological value (as set out in [Article 17 Habitats Directive 2019](#)). Sites of Special Scientific Interest are a conservation designation that protect areas that have been identified as being extremely valuable for their flora, fauna, physiological and geological features. Sites of Special Scientific interest often contain important habitats such as grasslands, parkland, woodland, ancient woodland and ancient trees.
- 9.74 The Council as Local Planning Authority is obliged to ensure that any grant of planning permission would have sufficient mitigation measures in place so as to ensure that there would be no harmful impact on the Epping Forest SAC arising from Likely Significant Effect (LSE). This is embedded within Policy G6 of the London Plan (2021) and Policies 5, 11, 77, 79 and 81 of the adopted Waltham Forest Local Plan LP1 (2024).
- 9.75 Whilst planning mitigations to impacts on Epping Forest SAC are primarily focussed on new house growth within the Borough, given the location of the site c.130m south-west of Epping Forest SAC, the development is within the 400m buffer of Epping Forest SAC and therefore may pose a risk from "urban effects" to the SAC from intrusive lighting, invasive species, and air pollution. As such, these matters need to be considered.
- 9.76 Moreover, the development is immediately adjacent a Site of Importance for Nature Conservation and is c.133m south-west of Epping Forest SSSI.
- 9.77 Given the sensitive location of the application site, a Preliminary Ecological Appraisal has been submitted with the application which sets out a series of recommendations to mitigate potential impacts on Epping Forest SAC and other ecological constraints.
- 9.78 Among the recommendations contained within the PEA are the requirements for a bat sensitive lighting scheme, a Construction Environmental Management Plan (CEMP), provision of 3no. bird boxes, 2no. bat boxes, 2no. log piles for invertebrates, a method statement for the removal of all instances of invasive non-native species from the site and disposal of the arisings as controlled waste given the presence of invasive species Butterfly-bush and montbretia on-site, and a method statement for the removal of vegetation to protect nesting birds and hedgehogs.
- 9.79 Other recommendations include compliance with the BNG statutory requirement, a landscaping scheme with plants of local provenance, and provision of green infrastructure which are considered in the Biodiversity and Landscaping sections above and below this section of the report. A newt survey is also recommended but a newt survey has been submitted with the application demonstrating that it is unlikely newts are present within the vicinity of the site and no further survey work is required.

9.80 Officers recommend conditions to secure the above recommendations to mitigate ecological impacts of the development ensuring compliance with Policy G6 of the London Plan (2021) and Policies 5, 11, 77, 79 and 81 of the adopted Waltham Forest Local Plan LP1 (2024).

(iv) *Landscaping*

9.81 Policy 53 of the adopted Waltham Forest Local Plan (2024) requires developments to respond to existing trees and provide a high-quality landscaping scheme.

9.82 The development comprises a high-quality planting scheme comprising a mixture of native species including tree planting, scrub mixture, use of grass-crete, ornamental planting, wildflower meadow grasses, and herbaceous perennials. The species selected are considered to be of low maintenance, enhance sensory experience, provide year-round structure and interest, and encourage biodiversity.

9.83 The generous use of soft landscaping will soften the hard landscaped elements including steps, ramp and retaining wall proposed. Due to the level change between the multi-use games area, there are retaining walls supporting pedestrian access routes to the building. This includes steps down through a curved pathway from the south-western side of the multi-use games area, with level access provided via a ramped pathway to the north-west side of the multi-use games area. Both pathways end at the south-eastern corner of the proposed building. The curved nature of the pathway adds visual interest to the landscaping scheme with the generous soft landscaping scheme softening these hard landscaped elements.

9.84 In terms of the hard landscaping, a mix of paving types have been proposed to also break up the monotony which can often occur with the use of one paving type. The perimeter of the building is surrounded by concrete flags in a silver colour to complement the building façade. Golden Tobermore Tegula block is used on step and ramp approaches. The steps will be a pre-cast step unit in a Tobermore Mayfair step unit with hazard inlay in a silver colour to complement paving surrounding the perimeter of the school.

9.85 Overall, the proposed landscaping is of a high quality with generous use of soft landscaping to soften hard landscaped elements which have sought to respond to the sites arboricultural constraints in accordance with Policy 53 of the adopted Waltham Forest Local Plan LP1 (2024).

F. Highways, Traffic Management and Parking

(i) *Sustainable Transport*

9.86 Policy T1 of the London Plan (2021) states that development proposals should facilitate the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. In order to improve air quality, improve personal health and well-being, and respond to the

Climate Emergency, Policy 60 of the adopted Local Plan (2024) sets out that the Council will facilitate growth and regeneration in a sustainable manner and promote sustainable travel. Policy T5 of the London Plan (2021) and Policies 60, 61, 62 and 66 operationalises this objective through the promotion and support of active and sustainable travel modes. Developments should therefore not have a harmful impact on the walking and cycling environment.

- 9.87 The London Borough of Waltham Forest Design Charter for Schools – 10 Principles for Well Designed Schools (2018) also reflects Policies 60, 61 and 62 of the adopted Waltham Forest Local Plan LP1 (2024) seeking developments to maximise opportunities for active and sustainable transport modes whilst discouraging private car use.

(ii) Active Travel

- 9.88 Policy 61 of the adopted Waltham Forest Local Plan LP1 (2024) requires developments to ensure the provision of secure on-site cycle parking. Policies T5 of the London Plan (2021) and Policy 61 of the Waltham Forest Local Plan LP1 (2024) require the provision of appropriate levels of cycle parking that should be fit for purpose, secure and well-located. This requirement is reflected in the London Borough of Waltham Forest Design Charter for Schools – 10 Principles for Well-Designed Schools (2018).
- 9.89 Policy T5 states that where local development plans have cycle parking standards which require more generous provision of cycle parking, then the local requirement should be followed. In this case, under Table 1 of Appendix 1 of the adopted Waltham Forest Local Plan LP1 (2024) it is confirmed that the Waltham Forest Local Plan LP1 (2024) has a higher standard than the London Plan (2021) requiring 1 long term space for every 4 pupils and 1 long term for every 4 staff (and an additional 1 short term space for every 100 pupils).
- 9.90 Prior to the classroom expansion and scooter parking facilities provided under 240808, the school did not provide any on-site cycle parking. Paragraph 21.7 of the adopted Waltham Forest Local Plan LP1 (2024) seeks to encourage existing developments which have too little or no cycle parking to meet the minimum cycle parking standards however there is no explicit requirement to compensate for under provision of existing uses. As such, the starting point for the assessment of the development against cycle parking standards is for cycle parking provision to meet the minimum requirements for the additional staff and students which the expansion will facilitate.
- 9.91 Under application 240808, a total of 22no. scooter parking spaces were approved at the site which have now been provided. This was to facilitate a 30-pupil expansion of the school (450 pupils to 480 pupils) as part of the wider expansion of the school. If the expansion as a whole is taken into account (i.e. 450 pupils increasing to 630 pupils plus 5 additional staff member), a total number of 48 long term cycle parking spaces should be provided in accordance with the adopted Waltham Forest Local Plan LP1 (2024).

- 9.92 Under this application, a mixture of scooter and cycle spaces will be provided in two secure and sheltered enclosures. Shelter 1 will provide 10 cycle spaces and shelter 2 will provide 6 cycle spaces and 10 scooter spaces. A total of 16 cycle spaces and 10 scooter spaces will be provided in addition to the existing 22 scooter spaces provided under 240808.
- 9.93 As such, when taking the whole expansion of the school under consideration, a total of 48 scooter and cycle parking spaces will be provided.
- 9.94 The use of scooters rather than bicycles as an alternative active travel mode has been observed amongst children (evidenced in Figure 2 above).
- 9.95 Given the use of the application site as a school and the nature of those attending the school (pupils aged 3-11), officers consider it appropriate to show flexibility when applying cycle parking standards with policy requirements for cycle parking easily transferrable to scooter parking as an alternative active travel mode.
- 9.96 The proposal provides both cycle and scooter parking facilities which offers both choice and flexibility in promoting active travel for pupils. It therefore meets the policy objectives of Policy 60 of the adopted Waltham Forest Local Plan LP1 (2024).
- 9.97 The LPA therefore welcomes the proposed scooter and cycle parking spaces and in quantitative terms the proposal meet the number of spaces required under the Waltham Forest Local Plan LP1 (2024) in integrating scooter spaces with cycle spaces.
- 9.98 The location of the new cycle and scooter parking spaces is convenient for those accessing the site from the western Hawkwood Crescent and Yardley Lane entrances to the site. The spaces will be sheltered and enclosed by secure fencing. The design and location of the cycle and scooter parking is therefore considered secure and fit for purpose in accordance with Policy T5 of the London Plan (2021) and Policies 60 and 61 of the adopted Waltham Forest Local Plan LP1 (2024).

(iii) Vehicular Parking

- 9.99 Policy T6 sets out the thresholds for car parking in new development which should be restricted in line with levels of existing and future public transport in the area. It states that developments should provide the minimum necessary parking, and that an absence of local on-street parking controls should not be a barrier to development.
- 9.100 The London Plan 2021 has no car parking standards for educational uses. Where no standard is provided, the London Plan states that the level of parking should be determined on a case-by-case basis taking account of 'Policy T6 Car Parking', current and future Public Transport Accessibility Levels (PTAL), and wider measures of public transport, walking and cycling connectivity.

- 9.101 However, the Waltham Forest Local Plan LP1 (2024) includes parking standards under Appendix 1 and Policy 66 for educational uses stating that in areas with a PTAL ratings of 1-2, there should be a maximum of 1 space for every 5 staff members. With 70 members of staff under the proposed development, a maximum number of 14 parking spaces are required.
- 9.102 The proposed development seeks to reduce the number of car parking spaces at the site from 21 to 15. Despite this, the site would still deliver an overprovision of car parking at the application site. Moreover, the Transport Assessment indicates that the existing car park is undersubscribed with a peak parking stress of 43% increasing to 93% with the proposed development adopting the conservative assumption that all new staff would park in the car park. However, it is recognised that even if oversubscribed, overspill from the car park onto the surrounding highway network is not considered to be significant. Whilst being over the maximum standard required under the Waltham Forest Local Plan LP1 (2024), the provision of 1 additional parking space on site is not deemed to result in an unacceptable development as a whole.
- 9.103 Officers note that concern has been expressed in public representations regarding the impact of the development on parking stress within the highway network surrounding the application site.
- 9.104 The Transport Assessment submitted with the application includes a parking survey which adopts the industry standard Lambeth Parking Survey Methodology. This identifies that roads adjoining Yardley School are unrestricted (i.e. are not within a Controlled Parking Zone) but are subject to yellow line and white line/zig zag parking restrictions. Surveyed roads include Hawkwood Crescent; Drysdale Avenue; Epping Glade; and Hawkdene. Of note is that Yardley Lane has been omitted from the survey. It is widely accepted that an observed parking stress of 85% - 90% is deemed to represent a very high uptake of kerb side parking (i.e. high parking stress).
- 9.105 Parking surveys were carried out on Friday 10th May 2024 in 15 minute 'beats' between the hours of 07:30-09:30 and 14:30-17:30 thus capturing the peak parking demand associated with the school's start and end times. The peak demand for kerbside parking in the survey area in the surveyed morning period is considered to be associated with parents dropping their children to school.
- 9.106 The results show that currently there is sufficient on-street parking capacity, with at least 73 parking spaces available within any 15- minute period surveyed. This indicates that the area is not currently experiencing high parking stress with on-street parking stress being on average approximately 47% with a peak parking stress during the peak afternoon/evening period being 70%.
- 9.107 The Transport Assessment assesses the impact of the development on parking. Giving account to 2023 travel mode splits, the proposal will generate an additional 68 car trips (per school run) by 2029.
- 9.108 The results of the parking surveys demonstrate that there is more than sufficient reserve parking capacity on the roads surrounding the school to accommodate

the predicted increase in pupil drop-offs and pick-ups emanating from the proposed development. Yardley Lane to the north west was not included in the parking survey as it did not meet the walking distance requirements in the industry approved Lambeth parking survey methodology. Nonetheless, the omission of Yardley Lane from the parking survey is not considered to impact the assessment of the impacts of the proposal in terms of parking as it is considered that there is adequate on-street parking capacity within the streets that were surveyed.

9.109 Overall, as demonstrated above, the proposed development would not result in undue parking stress on the local highway network. Notwithstanding this, should parking stress be considered as high, the absence of local on-street parking controls should not be a barrier to development in accordance with the London Plan (2021).

(iv) Electric & Disability Parking

9.110 Policy 67 of the adopted Waltham Forest Local Plan LP1 (2024) seeks to promote uptake of electric vehicles by providing infrastructure for electric vehicle charging. However, this policy is only engaged for developments that provide car parking through re-provision or when car parking has been justified through a Transport Assessment. Neither of these two trigger points are met in this case with the proposal involving the retention of existing car parking spaces and the loss of 6no. parking spaces.

9.111 Nonetheless, the development seeks to enhance facilities for electric vehicle users through the provision of 4no. electric vehicle charging spaces from which is supported under Policy 60 of the adopted Waltham Forest Local Plan LP1 (2024).

9.112 In terms of disabled parking, the Waltham Forest Local Plan LP1 (2024) requires 5% of spaces (1 minimum) to be allocated for disabled use. Adopting this standard, this would require 0.75 spaces for disabled. However, given that the development is part of an existing use there is no requirement to retrospectively provide disabled parking at the school site.

(v) Traffic

9.113 The new staff and pupils enrolled at the school will generate additional trips to the application site.

9.114 In terms of baseline traffic conditions, traffic data has been provided with the application which demonstrates that there are AM and PM peak periods on Hawkwood Crescent (08:00-09:00 and 15:00-16:00) aligning with school drop off and pick up times. Analysis of speed data confirms that there is not a speeding problem in the immediate vicinity of the school.

9.115 The Transport Assessment also includes data regarding personal injury accidents (PIAs) within the local vicinity. Since the end of 2021, there has been 9 (89% non-serious) PIA incidents of which only 3 were recorded during the

school week (Monday to Friday). The PIAs are therefore not considered to reflect a pattern or black spot of incidents which might otherwise suggest there is an inherent safety problem on the roads adjoining the school. The majority of the PIAs appear to be because of human error as opposed to a defective highway situation. The Council's Highways Team have reviewed the submission and raised no objections to its findings. The roads immediately adjoining the site are therefore considered to have a good safety record and do not present a safety concern.

9.116 In adopting the most up to date modal split data from 2023 whereby 45% of those attending the site travel by car/motorcycle, it is demonstrated that the expansion would generate 136 additional car movements per day. Noting the trend for traffic in the local highway to peak at corresponding times with school drop-off and pick-up times, approximately 68 additional movements in the morning and later afternoon each is estimated. Given the above information regarding road traffic statistics, collision data and traffic speeds, it is considered that the additional traffic movements would not significantly prejudice highway flows or safety. The Council's Highways Team have also not raised any concerns in this regard.

9.117 Whilst this is based on the 2023 modal split of those travelling to the site, officers would highlight that this is a conservative estimate of additional car movements for pre-cautionary approach to assess the traffic impacts which ignores the hard and soft measures set out within the submitted Travel Plan. The Travel Plan submitted includes hard and soft measures to encourage increased active and sustainable travel modes and disincentivise car usage. Hard measures include the provision of cycle and scooter parking facilities at the site whilst soft measures include the following:

- The school will update its website to include a page signposting to public transport, cycling, walking infrastructure or local amenities.
- The school's Management team will set up a car sharing group and encourage users to car share.
- Raise awareness of the sharing scheme with marketing and communication materials.
- The school will commit to providing priority spaces for car sharers for at least 5% of the total car parking capacity (1 space).
- Parking Bay 1 will be the car share priority parking spaces which is the closest space to the proposed building entrance.
- A drying room, shower facility and changing room will be provided within the proposed new building.
- Staff who want to park onsite will be required to fill out a form and apply for permission, this will be done to incentivise other sustainable transport modes and to discourage onsite parking.
- Within the boundary of the site and near the exit the school will put up a signpost showing routes towards bus stops, cycle and walking routes to other neighbourhoods.

9.118 It is therefore anticipated that with such measures, the modal split of travellers to the site will shift further away from car usage towards more sustainable and

active travel modes. To secure these measures, the Travel Plan will be conditioned in the event of approval.

(vi) Servicing and Deliveries

- 9.119 Policies 63 and 64 of the adopted Waltham Forest Local Plan LP1 (2024) requires developments to minimise the adverse impacts of deliveries, freight and servicing at both the construction and operational phases of the development. The construction phase of the development is considered below under 'Highway Infrastructure'.
- 9.120 As the site is already in use as a school, the proposed development is unlikely to result in significant increases in deliveries and servicing over the existing situation.
- 9.121 Nonetheless, the Transport Assessment has considered this matter stating that the development generates less than 4 delivery and servicing trips per day from food deliveries, fruit deliveries, milk deliveries, refuse collection, post deliveries, and other ad hoc deliveries. It is anticipated that the vast majority of deliveries will be undertaken by small to medium sized vehicles. This would not represent an increase over the existing situation with existing deliveries being larger and more waste collected rather than increasing the volume of vehicles servicing the site.
- 9.122 Moreover, a servicing area is positioned to the western side of the new building to facilitate waste collection and deliveries. Swept path analysis provided demonstrates that such vehicles used would be able to enter, manoeuvre and exit the site in forward gear.
- 9.123 The Delivery & Servicing Plan submitted as part of the Transport Assessment sets out measures to encourage sustainable servicing such as encouraging consolidated servicing, local sourcing of delivery items, and encouraging servicing outside of peak hours in accordance with Policy 64 of the adopted Waltham Forest Local Plan LP1 (2024). Compliance with these measures will be secured via planning condition.
- 9.124 As such, the development would not result in any increase in adverse impacts associated with deliveries, freight and servicing in accordance with Policies 63, 64 and 66 of the adopted Waltham Forest Local Plan LP1 (2024).

(vii) Highway Infrastructure

- 9.125 Policy T7 of the London Plan (2021) and Policies 63 and 65 of the adopted Waltham Forest Local Plan LP1 (2024) require major developments to provide a Construction Logistics Plan (CLP) setting out the potential impacts of construction traffic, and how this will be reduced. It must be demonstrated within the CLP that the impact of construction logistics on the road network will be minimised and that efficient and sustainable servicing and delivery of goods, waste and servicing activity to and from sites will be enabled.

9.126 The application is accompanied by an outline CLP. The Council's Highways Team have reviewed its contents and confirmed that a detailed CLP will need to be conditioned in the event of approval as a number of matters are not yet confirmed regarding the construction of the development. This includes:

- Site working hours
- Reference to live construction sites
- Information on the nursery's operations
- Details of works to take place, materials and equipment to be used
- Confirmation of whether concrete will be mixed on or off site
- Clarification of site access on Hawkwood Crescent
- Review mechanisms
- Positioning and provision of banksmen
- Consideration of highway weight restrictions

9.127 As such, to ensure considerate construction in accordance with Policy T7 of the London Plan (2021) and Policies 63 and 65 of the adopted Waltham Forest Local Plan LP1 (2024), a pre-commencement planning condition requiring the submission of a detailed CLP is recommended in the event of approval. A developer contribution of £750 is requested towards the monitoring of the detailed CLP once approved to ensure compliance with the principles approved. This will be secured by Unilateral Undertaking in the event of approval.

9.128 Given the risk to potential damage to the public highway as a result of the construction phase, a pre and post highway condition survey will be required to assess the physical state of the highway, and any damage resulting from the construction can be identified and the remedial works would be covered at the cost of the developer.

G. Waste Management

9.129 Policies 46, 57 and 93 of the adopted Waltham Forest Local Plan LP1 (2024) supports sustainable waste management through the provision of accessible, adequate and well-designed internal and external storage facilities for residual waste and recycling, following the specification set out within the Boroughs Waste and Recycling Guidance for Developers and that avoids any negative impacts it may have on visual amenity, access, health and security.

9.130 The Waste & Recycling Policy for Developers (September 2022) states that school developments must consider the following minimum requirements for waste and recycling (using rounded figures):

- 6 x 1100 litre bin for refuse
- 6 x 1100 litre bin for dry recycling
- 4 x 500 litre food waste bins.

- 9.131 The current waste management arrangements comprise capacity for the following bins contained within a store along the southern boundary of the site adjacent the boundary with No's 55 and 57 Hawkwood Crescent:
- 5no. large black bins for general waste
 - 2no. large green bins for recycling
 - 1-2 brown bins for food waste
- 9.132 The development comprises a new waste bin location along the southern boundary of the site slightly further west (closer to the vehicular access) adjacent the boundary with No's 43 and 45 Hawkwood Crescent.
- 9.133 The new bin store will be approximately 4.7m deep x 7.5m wide x 1.5m tall with double doors to its front for servicing by the Council's waste collection operatives. It will have a metal subframe enclosed in timber fencing and as indicated on plans the capacity will be for:
- 6x 1100l bins for refuse
 - 6x 1100l bins for recycling
 - 3x 500l food waste bins.
- 9.134 Noting the shortfall in food waste bins provided against the standard contained within the Waste & Recycling Policy for Developers (September 2022) officers have adopted a flexible approach in that should an additional food waste bin be deemed necessary, this can be provided by the Council with sufficient space within the bin store to accommodate this additional bin.
- 9.135 The visual impact of the bin store is assessed above in Section B. Odour from the bin store is not considered to result in any undue environmental or amenity issues as it will be located sufficiently away from rear elevations of neighbouring properties and will include a new tap for the washing down of the store internally to avoid pests and lingering odours. As such, the proposed waste management arrangements comply with Policy 57 and 93 of the adopted Waltham Forest Local Plan LP1 (2024).

H. Environment and Sustainability

(i) *Energy Efficiency*

- 9.136 Policies 85 and 87 of the adopted Waltham Forest Local Plan LP1 (2024) requires developments to ensure high environmental standards of development and sustainable resource management and efficiency to support the long term sustainability of our environment and respond to climate change in a practical and effective way.
- 9.137 Policy 85 requires the development must meet the following:
- Meet or exceed the net zero-carbon emissions target in line with the London Plan energy hierarchy and in line with best practice guidance including the GLA's latest energy planning guidance

- Achieve a minimum of 35% reduction below Part L of the Building Regulations on-site, targeting net zero carbon where possible, in line with the London Plan energy hierarchy and with best practice guidance, including the GLA's Energy Planning Guidance. Developments should meet the following London Plan 'Be Lean' stage (energy efficiency) carbon reduction targets before other measures are incorporated to meet the overall 35% reduction target, achieving a minimum of: 15% reduction below Part L of the Building Regulations for non-residential development.
- Carbon Offset Fund (COF) contributions will then be required for any shortfall in emission reductions.

9.138 The development seeks to promote low carbon energy generation and maximises renewable energy generation through the provision of:

- Provision of c.123sqm of solar PV panels which generate c.20,927 to 23,210 kWh of renewable electricity. Electrically powered Air Source Heat Pumps (ASHPs) to provide heating and hot water for the building.
- Energy efficient LED light fittings and controls will be installed.
- Electric equipment including kitchen equipment.
- No air conditioning will be used.

9.139 Calculations have been provided to demonstrate compliance with the 35% reduction target set out within Policy 85. These calculations demonstrate a 39% reduction and is therefore considered to comply with the requirements of Policy 85. Compliance with the carbon reductions proposed will be ensured through the use of a planning condition. Should the targets set out within Policy 85 not be met during implementation, a planning obligation towards the Carbon Offset Fund will be secured through a Unilateral Undertaking.

(ii) Sustainability

9.140 Policy 87 of the adopted Waltham Forest Local Plan LP1 (2024) also seeks to promote sustainable design and construction and requires the development to demonstrate that a minimum of BREEAM 'very good' (or equivalent) standards is met.

9.141 A BREEAM pre-assessment was submitted with the application which demonstrates that the 'very good' target should be achieved in accordance with Policy 87 of the adopted Waltham Forest Local Plan LP1 (2024). An 'excellent' target is demonstrated to be met but this may be subject to change during "fit-out" due to financial/budgetary constraints. Nonetheless, it has been satisfactorily demonstrated that a 'very good' standard, as required by Policy 87, can be achieved. A planning condition is recommended in the event of approval to ensure that this standard is met.

(iii) Water Efficiency

9.142 Policy SI5 of the London Plan (2021) and Policy 88 of the adopted Waltham Forest Local Plan LP1 (2024) require developments to be designed to be water efficient and reduce water consumption. Specifically, non-residential

developments should achieve at least the BREEAM excellent standard for the 'Wat 01' water category or equivalent.

- 9.143 The application demonstrates that a 40% improvement on baseline water consumption is targeted in accordance with BREEAM credit Wat 01 through the installation of efficient domestic water-consuming components and water recycling systems, monitoring of water usage and consumption, provision of leak detection systems, and installation of flow control devices that regulate water supply to each WC area and sanitary facility. Confirmation of compliance with the BREEAM credit Wat 01 will be secured by planning condition in the event of approval.

(iv) Air Quality

- 9.144 Policies 87 and 88 of the adopted Waltham Forest Local Plan requires that new development should neither contribute to nor suffer from unacceptable levels of air pollution. This is to improve the health and well-being of the Borough residents.
- 9.145 The application is accompanied with an Air Quality Assessment which covers both the construction and operational phases of the development.
- 9.146 During the construction phase, the development has been found to be at worst case scenario a 'medium risk' in relation to dust soiling effects on people and property, and 'low risk' to human health impacts. Mitigation measures are therefore recommended including: stakeholder communications plan; implementation of a Dust Management Plan; water suppression during demolition; site inspections and monitoring; no idling vehicles; ensuring vehicles comply with NRMM standards; use of enclosed chutes, conveyors and covered skips; minimisation of drop heights; use of solid screens and barriers around dusty activities; and site management.
- 9.147 In order to minimise dust and air quality matters which have the potential to impact human health, residential amenity, Epping Forest SAC, global warming and wider environmental impacts, a Dust Management Plan will be conditioned in the event of approval as the above recommendations are not committed measures nor specific to the site.
- 9.148 A condition to ensure no NRMM vehicles are used is also recommended.
- 9.149 Regarding the operational phase of the development, whilst the development is expected to generate road traffic, this is expected to fall below the relevant EPIC & IAQM indicative screening criteria. As such, road traffic impacts associated with the operation of the proposed development are expected to have an 'insignificant' effect on local air quality and nearby designated ecological habitats.
- 9.150 The Council's Environmental Health Team have reviewed submitted information and raise no objection subject to the conditions abovementioned.

(v) Sustainable Drainage and Flooding

- 9.151 Policy 91 of the adopted Waltham Forest Local Plan LP1 (2024) seeks to manage flood risk both on- and off-site. Educational developments are considered to be 'more vulnerable' to flooding as defined by the NPPF (2024).
- 9.152 The application site is not within a Critical Drainage Area nor is it in a flood zone at high risk of flooding being located within Flood Zone 1. However, Borough surface water flood modelling shows there is 1 in 100 +40% climate change surface water flood risk extents at the application site with a history of flooding events at the site and Yardley Lane specifically regarding surface water runoff from the forest. The Corporation of London have also been implementing a Natural Flood Management scheme within the area.
- 9.153 A Flood Risk Assessment has been submitted with the application which sets out that a series of proposed ACO channels will collect the surface water from the hardstanding area and new building directing surface water into an attenuation tank before connecting via hydrobrake into the existing surface water sewer network on Hawkwood Crescent. Rain gardens, green roofs and use of grass-crete are proposed which contribute to the sustainable urban drainage system provided. The Council's Highways Team which includes the Lead Local Flood Authority, have confirmed that the details submitted are sufficient to ensure flood risk is adequately mitigated and there is no need for a pre-commencement condition requiring further details of the drainage system.
- 9.154 In terms of foul sewage, the development seeks to redirect the existing foul sewage network around the northern perimeter of the building (upon agreement with Thames Water). The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure in accordance with Policy 68 of the adopted Waltham Forest Local Plan (2024). As such, a piling method statement will be secured by planning condition in the event of approval to ensure the protection of underground utility assets.

(vi) Contaminated Land

- 9.155 Policy 90 of the adopted Local Plan requires the Council to be satisfied that where sites are potentially contaminated, the proposal can be safely constructed and used in the future without hazardous substances posing a significant risk to human health.
- 9.156 A Ground Investigation Report was submitted with the application which identified that the ground may contain asbestos contaminants and polycyclic aromatic hydrocarbons (PAH) posing a risk to construction workers and the wider public. Asbestos is also potentially contained within the existing building. As such, officers recommend that conditions should be attached to ensure contamination is appropriately dealt with to ensure compliance with Policy 90 of the adopted Waltham Forest Local Plan LP1 (2024).

10. PLANNING OBLIGATIONS

10.1 Unilateral Undertaking Legal Agreements are a material consideration in the determination of a planning application. The purpose of such an agreement is to make otherwise unacceptable development acceptable, and they should only be sought where they meet all the following tests:

- i. Necessary to make the development acceptable in planning terms,
- ii. Directly related to the development; and
- iii. Fairly and reasonably related in scale and kind to the development.

10.2 In terms of the Unilateral Undertaking Legal Agreement, the required Heads of Terms, having regard to planning policy, the Waltham Forest Local Plan LP1 (2024) and the Revised Planning Obligations SPD (2017) for this development relate to the following Heads of Terms which are also outlined throughout this report.

- Pre- and Post-Construction Highway Condition Survey
- CLP monitoring
- Biodiversity Net Gain Plan and Monitoring
- Energy and Carbon Reduction
- Employment & Skills
- Legal Fees
- Monitoring and Implementation.

11. ADDITIONAL CONSIDERATIONS

Public Sector Equality Duty

11.1 In making your decision you must have regard to the public sector equality duty (PSED) under s.149 of the Equalities Act. This means that the Council must have due regard to the need (in discharging its functions) to:

- A. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- B. Advance equality of opportunity between people who share a protected characteristic and those who do not. This may include removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic; taking steps to meet the special needs of those with a protected characteristic; encouraging participation in public life (or other areas where they are underrepresented) of people with a protected characteristic(s).
- C. Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.

11.2 The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

- 11.3 The PSED must be considered as a relevant factor in making this decision but does not impose a duty to achieve the outcomes in s.149 is only one factor that needs to be considered, and may be balance against other relevant factors.
- 11.4 It is not considered that the recommendation to grant permission in this case will have a disproportionately adverse impact on a protected characteristic.

Human Rights

- 11.5 In making your decision, you should be aware of and take into account any implications that may arise from the Human Rights Act 1998. Under the Act, it is unlawful for a public authority such as the London Borough of Waltham Forest to act in a manner that is incompatible with the European Convention on Human Rights.
- 11.6 You are referred specifically to Article 8 (right to respect for private and family life), Article 1 of the First Protocol (protection of property). It is not considered that the recommendation to grant permission in this case interferes with local residents' right to respect for their private and family life, home and correspondence, except insofar as it is necessary to protect the rights and freedoms of others (in this case, the rights of the applicant). The Council is also permitted to control the use of property in accordance with the general interest and the recommendation to grant permission is considered to be a proportionate response to the submitted application based on the considerations set out in this report.

12. CONCLUSION OF ASSESSMENT

- 12.1 The proposed development will deliver an improved educational facility that will assist in meeting the forecasted need for additional school places within the north Chingford area. The development will contribute towards sustainable development, will not result in any unacceptable visual or residential amenity impacts, arboricultural or biodiversity impacts, or any highway issues.

13. RECOMMENDATION

- 13.1 Based on the assessment above, the Planning Committee is recommended to grant planning permission, subject to Unilateral Undertaking, conditions and informatives.

14. CONDITIONS AND REASONS

Time Limit

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON: To adhere to the statutory timeframes for the commencement of development.

Approved Plans and Documents

2. The development hereby permitted shall be carried out in accordance with the following approved plans and supporting documents and thereafter maintained as such for the lifetime of the development:

Plans and Drawings

- EVO-XX-00-DR-A-032, P02 (27/10/2025)
- C13942-PER-XX-XX-DR-C-02011, Rev P2 (12/11/2025)
- C13942-PER-XX-XX-DR-C-02001, Rev P5 (12/11/2025)
- 2530-WWA-ZZ-ZZ-D-L-0502, P05 (11/11/2025)
- 2530-WWA-ZZ-ZZ-D-L-0501, P05 (11/11/2025)
- 2530-WWA-ZZ-ZZ-D-L-0303, P04 (11/11/2025)
- 2530-WWA-ZZ-ZZ-D-L-0101, P10 (11/11/2025)
- 2530-WWA-ZZ-ZZ-D-L-0301, P02 (26/06/2025)
- EVO-XX-ZZ-DR-A-044 (18/06/2025)
- EVO-XX-ZZ-DR-A-036, P1 (18/06/2025)
- EVO-XX-ZZ-DR-A-022, P1 (24/06/2025)
- EVO-XX-00-DR-A-025, P1 (18/06/2025)
- EVO-ZZ-00-DR-A-031, P01 (18/06/2025)
- EVO-ZZ-00-DR-A-030, P01 (18/06/2025)
- EVO-XX-ZZ-DR-A-041, P02 (18/06/2025)
- EVO-XX-ZZ-DR-A-040, P01 (18/06/2025)
- EVO-XX-ZZ-DR-A-039, P01 (18/06/2025)
- EVO-XX-ZZ-DR-A-038, P01 (18/06/2025)
- EVO-XX-ZZ-DR-A-037, P01 (18/06/2025)
- EVO-XX-00-DR-A-035, P01 (18/06/2025)
- EVO-XX-00-DR-A-033, P01 (18/06/2025)
- EVO-XX-00-DR-A-021, P01 (24/06/2025)
- EVO-XX-00-DR-A-020, P01 (24/06/2025)
- C13942-PER-XX-XX-DR-C-03001, P1 (16/04/2025)
- EVO-ZZ-00-D-E-106 P2 (undated)
- EVO-XX-00-DR-M-110 Rev P5 (18/06/2025)
- EVO-XX-00-DR-M-111 Rev P5 (18/06/2025)
- EVO-XX-00-DR-M-112 Rev P4 (18/06/2025)
- EVO-XX-00-DR-M-117 Rev P5 (18/06/2025)
- 2530-WWA-XX-XX-D-L-302 Rev P01(24/05/2025)
- EVO-XX-00-DR-A-010 P01 (24/06/2025)
- EVO-XX-00-DR-A-011 P01 (24/06/2025)

Documents:

- Addendum Arboricultural Report, 240148-PD-22 (15/01/2026)
- Arboricultural Impact Assessment, 240148-PD-21a (27/06/2025)
- Biodiversity Net Gain Plan, Version 2.0 (14/11/2025)

(Item 4.4)

- Flood Risk Assessment, C13942-PER-XX-XX-RP-C-02010, Revision P4 (12/11/2025)
- The Statutory Biodiversity Metric (14/11/2025)
- Sustainability Statement (08/07/2025)
- Ground Investigation, 24.09.031-dr02 (30/01/2025)
- Planning Statement, V1 (05/07/2025)
- Design & Access Statement, Issue 2 (January 2026)
- BREEAM Pre-Assessment Report, Rev P01 (17/07/2025)
- Noise Impact Assessment, Rev 01 (06/11/2024)
- Air Quality Assessment, Rev 1.0 (16/12/2024)
- Great Crest Newt Environmental DNA Survey, 1.0 (23/05/2025)
- Preliminary Ecological Appraisal and Preliminary Roost Assessment, 1.0 (04/07/2025)
- Electrical Services Stage 3 Report, Rev P2 (05/06/2025)
- (Basic Lighting) Calculation Objects (undated)
- Piazza II LED (undated)
- Construction Logistics Plan (May 2025)
- BREEAM Transport Assessment (May 2025)
- Transport Addendum (February 2026)
- BREEAM Travel Plan (May 2025)
- BRUKL Output Document (03/06/2025)
- Thermal Comfort and Energy Report Incorporating Net Zero Statement and Daylight Calculations, Rev.2 (10/06/2025)
- Planning Fire Safety Statement, Rev.02 (05/06/2025)

REASON: For the avoidance of doubt and in the interests of proper planning.

Contamination & Site Preparation

3. Prior to commencement of construction works, a scheme including the following components (where applicable) to address the risk associated with site contamination shall be submitted to and approved in writing by the Local Planning Authority (LPA):
 - A) A Desk Study report including a preliminary risk assessment and conceptual site model.
 - B) A ground investigation based on the findings of the Desk Study Report to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
 - C) The results of the investigation and revised risk assessment and based on these, in the event that remediation measures are identified necessary a remediation strategy shall be submitted giving full details of the remediation measures required and how they will be undertaken.

Any investigation and risk assessment must be undertaken in accordance with the Environment Agency's Model Procedures for the Management of

Contaminated Land (CLR11). In the event that additional significant contamination is found at any time when carrying out the approved development it must be reported immediately to the LPA.

(For the avoidance of doubt, this condition can be discharged on a section-by-section basis.)

REASON: To ensure the risks from land contamination to future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policy 90 of the adopted Waltham Forest Local Plan LP1 (2024).

4. Prior to occupation, a verification report relating to contamination, if remedial works are required in relation to condition 3, shall be provided setting out the details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy are complete shall be submitted to and agreed in writing by the Local Planning Authority.

REASON: To ensure the risks from land contamination to future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policies 48, 89 and 90 adopted Waltham Forest Local Plan LP1 (2024).

5. Prior to the commencement of any development, an intrusive pre-demolition asbestos survey, carried out in accordance with HSG264 and supported by an appropriate mitigation scheme to control risks to future occupiers, shall be submitted to and approved in writing by the local planning authority. The report must be written by a suitably qualified person and shall be independently verified to the satisfaction of the local planning authority prior to occupation of the development. The approved details shall be adhered to throughout the period of demolition.

REASON: To ensure the risks from land contamination to future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policy 90 of the adopted Waltham Forest Local Plan LP1 (2024).

6. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for

damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

REASON: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure in accordance with Policy 68 of the adopted Waltham Forest Local Plan (2024).

Construction

7. Prior to the commencement of the development a detailed Construction Logistics Plan shall be submitted to and approved by the Local Planning Authority. The logistics plan shall include details of site access, journey planning, access routes, hours of delivery, temporary traffic arrangements or restrictions, site operation times, loading and unloading locations and material storage. All works shall be carried out in accordance with the approved details throughout all demolition and construction works.

REASON: To ensure that disruption is kept to a minimum and does not affect highway traffic flows to comply with Policies 50, 57, 63, 65, 66, 87 and 89 of the adopted Waltham Forest Local Plan LP1 (2024) and to assess the impact on the schools play spaces in accordance with Policy 47 of the Waltham Forest Local Plan (2024).

8. Prior to the commencement of any part of the development, including demolition and site clearance, a Construction Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority. The method statement shall include details of the following:
 - Works of demolition and construction shall be carried out during normal working hours, i.e. 08:00 to 18:00 hours Monday to Friday, and 08:00 to 13:00 hours on Saturdays, with no noisy working audible at the site boundary being permitted on Sundays or Bank Holidays
 - Construction Vehicle Access Strategy Likely noise levels to be generated from plant
 - Details of any noise screening measures
 - Proposals for monitoring noise and procedures to be put in place where agreed noise levels are exceeded
 - A method statement for vegetation removal
 - Caution during site clearance to protect hedgehogs
 - Where works are likely to lead to vibration impacts on surrounding residential properties, proposals for monitoring vibration and procedures to be put in place if agreed vibration levels are exceeded.Note: it is expected that vibration over 1mm/s measured as a peak particle velocity would constitute unreasonable vibration.

- Full details of any lighting to be used, including for security reasons
- The method statement shall make reference to and comply with The Mayor of London's supplementary planning guidance (SPG) 'The control of dust and emissions from construction and demolition' [https://www.london.gov.uk/whatwehttps://www.london.gov.uk/whatwe\[1\]do/planning/implementinglondon-plan/supplementary-planning-guidance/control-dust\[1\]anddo/planning/implementinglondonplan/supplementary-planning-guidance/control-dust-and](https://www.london.gov.uk/whatwehttps://www.london.gov.uk/whatwe[1]do/planning/implementinglondon-plan/supplementary-planning-guidance/control-dust[1]anddo/planning/implementinglondonplan/supplementary-planning-guidance/control-dust-and)

In particular the applicant shall:

- Submit for approval an Air Quality & Dust Management Plan (AQDMP)
- Equipment and plant used on site shall comply with the requirements for 'Non-Road Mobile Machinery' (NRMM)
- Submit a for approval Dust Monitoring Programme

All the above submissions shall have regard to the Mayor's SPG Reference shall be made to:

- BRE four part Pollution Control Guides Controlling particles and noise pollution from construction sites.
- BS 5228: Noise and vibration on construction and open sites

REASON: To ensure considerate construction and to protect the amenities of the nearby residents from excessive noise, light and dust to comply with Policies 50, 57, 63, 64, 87 and 88 of the adopted Waltham Forest Local Plan LP1 (2024) and to minimise ecological impacts, specifically on Epping Forest SAC to comply with Policy G6 of the London Plan (2021) and Policies 5, 11, 77, 79 and 81 of the adopted Waltham Forest Local Plan LP1 (2024).

Design & Architecture

9. No development above ground floor level shall take place until details of all external facing materials, including soffits and upper floor walls, have been submitted to, and approved in writing by, the local planning authority. The development shall be carried out in accordance with the approved details prior to occupation.

REASON: To ensure a high standard of design is achieved in compliance with Policy 53 of the Adopted Waltham Forest Local Plan (2024).

Noise

10. The specification of the kitchen supply and extract ventilation air handling units with noise data shall be submitted to and approved in writing by the Local

Planning Authority. The approved specification shall be retained as such for the lifetime of the development.

REASON: In the interests of protecting residential amenity from noise nuisance in accordance with Policies 50 and 57 of the adopted Waltham Forest Local Plan (2024).

Landscaping & Biodiversity

11. Prior to the commencement of development on site, the following must be submitted to the Local Planning Authority and approved:

- a) a Biodiversity Gain Plan prepared in accordance with the Richard Graves Associates, Biodiversity Net Gain Report, Nov 2024 and a,
- b) 30-year Habitat Monitoring and Management Plan (HMMP), prepared in accordance with the Biodiversity Gain Plan. The 30-year Habitat Monitoring and Management Plan (HMMP) must include:

- A non-technical summary
- The roles and responsibilities of the people or organisation(s) delivering the HMMP
- details of the onsite Habitat Creation and Enhancement Works required, in accordance with the approved Biodiversity Gain Plan;
- a programme for their management and maintenance, in accordance with the approved Biodiversity Gain Plan, for not less than thirty (30) years from the Habitat Creation and Enhancement Works Completion Date;
- details of the onsite Habitat Creation and Enhancement Works required;
- a programme for their management and maintenance for not less than thirty (30) years from the estimated Habitat Creation and Enhancement Works Completion Date;
- the number and location of all Biodiversity Units; and
- the methodology, format and frequency of Management Plan Monitoring Reports to be provided to the Council together with access and inspection arrangements to facilitate such monitoring. The management plan monitoring reports must be provided on the first, second, fifth, tenth, twentieth and thirtieth anniversaries of the Habitat Creation and Enhancement Works Completion Date which sets out:
 - the results of a review of the operation and effectiveness of the Habitat Management and Monitoring Plan since the previous Management Plan Monitoring Report; and
 - any remedies or measures that are required to be implemented to meet the requirements of the Habitat Management and Monitoring Plan.

REASON: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990 and policy 79 of Waltham Forests LP1 (2024).

12. The habitat creation and enhancement works set out in the approved (HMMP) shall be completed within 3 months of occupation of the final phase. Notice in writing shall be given to the Council when the:

- a) (HMMP) has been implemented; and
- b) habitat creation and enhancement works as set out in the (HMMP) have been completed.

REASON: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990 and policy 79 of Waltham Forests LP1 (2024).

13. Monitoring reports shall be submitted to local planning authority in writing in accordance with the methodology and frequency specified in the approved (HMMP).

REASON: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990 and policy 79 of Waltham Forests LP1 (2024).

14. The created and/or enhanced habitat specified in the approved (HMMP) shall be managed and maintained in accordance with the approved (HMMP).

REASON: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990 and policy 79 of Waltham Forests LP1 (2024).

15. No development whatsoever shall take place in relation to the development hereby approved including site clearance and investigations as well as preparatory work, until a scheme for the protection of the retained trees (the tree protection plan) and the appropriate working methods (the arboricultural method statement) in accordance with Clause 7 of British Standard BS5837 - Trees in Relation to Construction - Recommendations has been agreed in writing by the local planning authority. The approved measures shall be implemented prior to the commencement of site clearance, preparatory work and development and shall be retained for the entirety of the construction period.

REASON: To ensure the well-being of the trees and in the interest of biodiversity and the amenity of the surrounding area, in accordance with Policy G7 of the London Plan (2021) and Policies 77, 79 and 80 of the adopted Waltham Forest Local Plan (2024).

16. Prior to the occupation of the development, recommendations 11, 12 and 13 of the "Preliminary Ecological Appraisal and Preliminary Roost Assessment, 1.0

(04/07/2025)” shall be implemented and retained as such for the lifetime of the development.

REASON: In the interests of biodiversity in accordance with 5, 11, 77, 79 and 81 of the adopted Waltham Forest Local Plan LP1 (2024).

17. Prior to the commencement of development, notwithstanding site investigation and clearance works, demolition and groundworks to slab level, a lighting scheme including lux plan shall be submitted to and approved in writing by the Local Planning Authority, which shall be in strict accordance with relevant guidance from the Bat Conservation Trust and Institute of Lighting Professionals advice on artificial lighting and bats. All luminaries within the approved scheme shall be oriented and designed in such a way to minimise light spillage beyond the site boundary and prevent glare to light sensitive receptors identified. The lighting scheme shall be implemented in accordance with the agreed details and thereafter maintained as such for the lifetime of the development.

REASON: In the interests of biodiversity, mitigating adverse impacts on bats and prevent light nuisance to nearby residential receptors in accordance with 5, 11, 50, 77, 79 and 81 of the adopted Waltham Forest Local Plan LP1 (2024).

Sustainable Travel

18. Prior to occupation, the development shall be carried out in accordance with the approved details regarding the cycle and scooter parking contained within “EVO-XX-00-DR-A-025, P1 (18/06/2025)” and shall be retained for the lifetime of the development.

REASON: To promote active and sustainable travel modes in accordance with Policy 60 of the adopted Waltham Forest Local Plan (2024).

19. The ‘Travel Plan Measures’ contained within Table 4 of “BREEAM Travel Plan (May 2025)” shall be implemented within 6 months of occupation of the hereby approved development and retained for the lifetime of the development unless otherwise agreed in writing by the Local Planning Authority.

REASON: To encourage modal shift away from car use and towards active and sustainable travel modes in accordance with Policies 60, 61, 62, 63 and 66 of the adopted Waltham Forest Local Plan LP1 (2024).

Waste

20. The hereby approved development shall be implemented in accordance with the approved details on “EVO-XX-00-DR-A-025, P1 (18/06/2025)” and the refuse store shall be brought into use prior to first occupation of the development hereby permitted and shall be retained as such for the lifetime of the development.

REASON: To ensure that adequate arrangements are made for the storage and collection of refuse and recycling in accordance with Policies 53, 57 and 93 of the adopted Waltham Forest Local Plan LP1 (2024) and the Waste and Recycling Guidance for Developers (2023).

Security

21. The development hereby approved, shall achieve Secure by Design Certification.

a) Prior to above ground works, details of the measures to be incorporated into the development demonstrating how the development can achieve Secure by Design Certification, shall be submitted to and approved in writing by the Local Planning Authority, in consultation with the Metropolitan Police Designing Out Crime Officers. The development shall be carried out in accordance with the agreed details.

b) Prior to the first occupation, the development shall achieve a Certificate of Compliance to the relevant Secure by Design Guide(s) submitted to and approved in writing by the Local Planning Authority in conjunction with the Metropolitan Police and thereafter shall be fully retained and maintained as such for the lifetime of the development.

REASON: In the interests of safety and security in compliance with Policy D11 of the London Plan (2021) and Policy 58 of the adopted Waltham Forest Local Plan (2024).

Energy Efficiency & Sustainability

22. Prior to the occupation of any part of the development hereby permitted, a report demonstrating how the scheme reduces the carbon dioxide emissions of the development by at least 35% compared to the 2021 Building Regulations shall be submitted to, and approved in writing by, the Local Planning Authority. The report shall reference the measures set out in the "BRUKL Output Document (03/06/2025)", "BREEAM Pre-Assessment Report, Rev P01 (17/07/2025)" and "Thermal Comfort and Energy Report Incorporating Net Zero Statement and Daylight Calculations, Rev.2 (10/06/2025)" accompanying the planning application but shall explain what measures have been implemented in the construction of the development. The development and energy efficiency measures shall thereafter be retained for the lifetime of the development. Any subsequent shortfall shall be compensated by payment to the Council's Carbon Offset Fund (secured via Unilateral Undertaking).

REASON: In the interests of the sustainability and energy efficiency of the development and to meet the requirements of Policy SI 2 of the London Plan (2021) and Policies 85 and 87 of the adopted Waltham Forest Local Plan (2024).

23. The building hereby approved shall be constructed to achieve not less than BREEAM 'Very Good'. It shall not be occupied until an interim BREEAM certification has been provided confirming that not less than 'Very Good' has been achieved. Within six months of occupation, formal BREEAM certification confirming this certification shall be submitted to and approved in writing by the Local Planning Authority.

REASON: In the interest of sustainability, energy efficiency and to provide a high-quality development.

24. Prior to the occupation of any part of the development hereby permitted, a report demonstrating how the scheme achieves at least the BREEAM excellent standard for the 'Wat 01' water category with regards water efficiency shall be submitted to, and approved in writing by the Local Planning Authority. The report shall reference the measures set out in the "BREEAM Pre-Assessment Report, Rev P01 (17/07/2025)" accompanying the planning application but shall explain what measures have been implemented in the construction of the development. The approved water efficiency measures shall thereafter be retained for the lifetime of the development.

REASON: In the interests of sustainability and water efficiency in accordance with Policy SI 5 of the London Plan (2021) and Policy 89 of the adopted Waltham Forest Local Plan (2024).

15. INFORMATIVES

15.1 **IMPORTANT:** Compliance With Planning Conditions Requiring Submission and Approval of Details Before Development Commences. You will be in breach of planning permission if you start development without complying with a condition requiring you to do something before you start. For example, that a scheme or details of the development must first be approved by the Local Planning Authority. - Carrying out works in breach of such a condition will not satisfy the requirement to commence the development within the time permitted. - Beginning development in breach of a planning condition will invalidate your planning permission. - If you require confirmation as to whether the works you have carried out are acceptable, then you should apply to the Local Planning Authority for a Certificate of Lawfulness.

15.2 To assist applicants the Local Planning Authority has produced policies and written guidance, all of which is available on the Council's website and which have been followed in this instance, and offers a pre-planning application advice service. In this instance the applicant was provided pre-application advice and the advice was followed accordingly.

15.3 A unilateral undertaking has been entered into with the London Borough of Waltham Forest in conjunction with this grant of planning permission to ensure appropriate facilitating highway works; energy and carbon

consumption, employment and apprenticeship placements, BNG provision and monitoring, monitoring of Construction Logistics Plans; along with relevant legal fees and monitoring fees.

- 15.4 Construction and demolition works audible beyond the boundary of the site should only be carried out between the hours of 0800 and 1800 hours Mondays to Fridays and 0800 and 1300 hours on Saturdays, and not at all on Sundays or Public/Bank Holidays.
- 15.5 This notice is without prejudice to your responsibilities under any other legislation, including Building Regulations.
- 15.6 Public sewers cross or are close to the development. Build over agreements are required for any building works within 3 metres of a public sewer and/or within 1 metre of a public lateral drain. This is to prevent damage to the sewer network and ensures Thames Water have suitable and safe access to carry out maintenance and repairs. Please refer to Thames Water guide on working near or diverting our pipes: <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>
- 15.7 In reference to Condition 6, please submit a foundation/piling layout plan clearly indicating the locations of all foundation/piles to be installed on the development site. This plan should show the positions of the foundation/piles in relation to Thames Water clean water mains and sewers and local topography such as roads (please include road names), existing buildings and/or any other notable features. Thames Water require drawings indicating the location of all piling and the clearance between the face of the pile to the face of a pipe.
- 15.8 The outline fire assessment has not been formally approved by the London Fire Brigade or the Council's building control team as part of this planning application process. Regulatory compliance in relation to fire prevention and risk assessment as part of a) the temporary school works b) the permanent school building and c) the residual school estate remain the responsibility of the owner of the building, informed by any further necessary consultation.
- 15.9 You are reminded of the requirements of the Wildlife and Countryside Act 1981 in relation to Protected Species and to take necessary precautionary measures in relation to demolition works on the site.