

PLANNING COMMITTEE MEETING: 12 November 2009

**PLANNING APPLICATION FOR DETERMINATION BY THE LTGDC
REPORT OF THE DIRECTOR OF PLANNING**

UDC CASE NUMBER:	LTGDC-09-038-OUT	DATE MADE VALID:	14/08/2009
APPLICATION NUMBER:	U0014.09/LBHG	TARGET DATE:	30/11/2009

APPLICANT:	Havering College of further and higher education
AGENT:	Drivers Jonas
PROPOSAL:	Redevelopment to provide 11,800m ² D1 education use with ancillary sporting facilities, new vehicular access arrangements and parking for 200 cars.
LOCATION:	Former Carpetright Site, New Road, Rainham RM13 8QN

1. SUMMARY

- 1.1 The application is located on the former Carpetright site on New Road (A1306) in Rainham, approximately 500 metres west of Rainham Village. The application seeks outline planning permission for an 11,800m² of D1 education use to accommodate a new campus for Havering College.
- 1.2 The principle of the development does not align with the Site Specific Allocation for the area due to the application being for a single non-residential use, rather than a residential led mix of uses. However, it is the opinion of officers that the scheme warrants a more flexible approach to the consideration rather than a rigid application of planning policy. This view is based on the wider benefit that the scheme will bring to the wider community and the potential for this site to act as a catalyst for further develop along the A1306. Also, the view is taken that LDF policy allows for an overall assessment of uses along all of the A1306.
- 1.3 In terms of the outline parameters, the building footprint, scale and height are all considered to be appropriate in the context of the surrounding area. The access arrangements are also considered to be suitable, particularly with the applicant's agreement to provide a new signalised junction to New Road.
- 1.4 The layout of the scheme provides for a large area of open space which will eventually form part of a green corridor linking other sites within the SSA12 (A1306) area. In addition to providing improved linkages to the wider area, this green

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corridor has an important role as a drainage swale thereby improving flood mitigation for the area.

- 1.5 The site is located near three major hazard pipelines, one of which presents implications for the building footprint sought by this application. The application is supported by a risk assessment which outlines methods by which this risk can be mitigated. On the whole, officers do not consider there to be sufficient grounds on which to refuse the application, given that the detailed design is not fixed and that there is opportunity to apply direct mitigation to the pipeline.
- 1.6 The application before Members is, on balance, recommended for approval, subject to conditions to secure the detailed design reserved matters. A Section 106 agreement is not required in this instance.

2. SITE AND PROPOSAL

Existing Situation

- 2.1 The site is the former Carpetright depot location on New Road (A1306) in Rainham. The site is 3.2 hectares in total land area and is broadly rectangular in shape, occupying a frontage along New Road of 150 metres and extending 190 metres south west from New Road to the rear of the site. Previously, the majority of the site was occupied by a large warehouse building known as Amberley House, however this has now been removed.
- 2.2 On the southern boundary of the site is Burnside House, a warehouse structure occupying a 30 metre by 70 metre building footprint and constructed of brick and metal cladding typical of modern warehouse structures. Burnside house is currently used by Havering College for trades based training and was granted consent for this education use by the Corporation in October of 2008 under permission U0008.08/LBHG.
- 2.3 The application site is located 500 metres from the edge of Rainham Village and 850 metres from Rainham Mainline Station. Bus services from Rainham Village provide regular connections between Romford, Barking, Dagenham and Lakeside Shopping Centre with three services stopping in front of the application site. Rainham Station provides regular services between London Fenchurch Street and Southend, operated by the C2C rail franchise.
- 2.4 To the east and west of the site is a corridor of warehouse, industrial and commercial uses. To the west of the site is a variety of commercial uses collectively referred to as Dovers Corner. This site is the subject of a planning application for a mix of residential and commercial uses that is currently being considered by the Corporation.
- 2.5 To the west of the site is the Mudlands Industrial Estate, which is occupied by material reclamation and recycling facilities and storage and distribution depots.
- 2.6 Along the southern boundary of the site are the railway lines of the C2C services and High Speed 1, the latter providing services between London St Pancras, Ashford and continental Europe. Beyond these railway lines is the Thames Water Sewage Treatment Works.

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- 2.7 To the north of the site, on the opposite side of New Road are two 14 storey blocks of council flats surrounded by two storey terraced housing. The terraced housing fronting New Road is of Victorian era with the remainder being constructed post Second World War.
- 2.8 The site is well connected to the local and strategic highway networks. New Road provides easy access to the A13 via Manor Way to the west. The A13 itself provides access to central London and the M25.
- 2.9 The site is not within any conservation area or near any listed buildings but is within a Site Specific Allocation of the adopted LDF. The implications of this Site Specific Allocation are discussed in detail later in this report.

Proposal

- 2.10 The application seeks outline planning permission for the construction of a new college campus with ancillary indoor sporting facilities, new access arrangements, car parking and landscaping. The College currently occupies various buildings in Havering and urgently needs to concentrate its activities in a new building meet both demand from students and a requirement to provide modern facilities.
- 2.11 The application red line does not correspond with the ownership boundary of the site. An area of 0.92ha has been excluded from the application area in the north eastern corner of the site. This area will be the subject of a separate residential led planning application by the Corporation at a later date. Therefore, the application area forms an 'L' shaped parcel of land 2.3ha in area.
- 2.12 The application proposes a total of 11,800m² of D1 education use. Within this D1 use, the College proposes to offer Level 2 and 3 apprenticeships in construction, manufacturing, engineering and accounting and Higher Education provision from Foundation to Level 5 for engineering, motorsport, construction and finance. For 16 to 18 year olds, the College will offer training in construction, plumbing, transport and logistics, retail, manufacturing and engineering and hair and beauty. The College is also intended to act as a hub for diploma delivery in the south of the Borough. The expected student population is 1670, supported by 167 staff.
- 2.13 The application also proposes an indoor sporting facility to be used by the students of the campus and located towards the front of the site. It is also intended to make this sports hall available to the local community at specifically designated times.
- 2.14 Although the application is in outline, the application seeks to fix the access arrangements in detail. Specifically, these access arrangements include a new access point from New Road created on the boundary between the application site and the balance of the land remaining. This access point is intended to be utilised by staff and students of the campus and will extend through south to a car park of up to 200 spaces located on the southern boundary of the site. The secondary access point to the site is the existing service road which will act as a service and delivery access to the campus.
- 2.15 The outline parameters of the campus building are the building footprint and the building heights. The building footprint has set the maximum extremities to within +/- 1 metre while the detail in between is set to +/- 2 metres. The proposed building

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layout is comprised of two dominant north/south orientated ranges(?), one of which positioned close(?) to the New Road frontage and the other occupying two thirds of the length of the site. Two shorter east/west ranges(?) are also proposed that link the main buildings and provide additional work space. The proposed building footprint sits between the two access roads and occupies the northern two thirds of the site.

2.16 The vertical parameters have been established to correspond to different elements of the building footprint and are set at heights above finished floor level of 10 metres and 17.5 metres, or more accurately, 12.85 metres AOD and 20.35 metres AOD. The higher parameters correspond to the north/south footprint lengths while the lower parameters are allocated to the east/west footprint lengths. Being an outline application, the specific design detail of the campus building is intended to be a reserved matter for later consideration.

2.17 The specific details of the landscaping arrangements are also reserved, however the scheme intends to bring forward a number of features unique to the site. This includes a drainage swale that crosses the site providing a barrier between the main campus building and the car parking area.

3. MAIN ISSUES

- Principle of the Use
- Scale Parameters
- Access Parameters
- Uses
- Landscape and Flood Risk
- Proximity to High Pressure Gas Pipelines
- Air Quality
- Contamination
- Sustainability and Energy

4. RELEVANT SITE HISTORY

4.1 The planning history of relevance to this proposal is listed below:

- U0008.08 – Change of use of warehouse B8 to education D1 – Approved
- P1872.08 – Windows to western elevation, security fencing and gates, basketball court and perimeter fencing - Approved

5. CONSULTATIONS/NOTIFICATIONS

London Borough of Havering

5.1 The application was considered by Havering's Regulatory Services Committee on the 29th of October, who unanimously resolved to recommend that the application be approved, subject to conditions to secure the following:

- Details of reserved matters
- Details of phasing
- Restriction of noise levels from the site

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- Flood mitigation
- Contamination
- Gas pipeline mitigation
- Submission of the Travel Plan
- Provision for servicing and refuse collection
- Secured by design principles
- Details of external materials
- Full details of the community use
- Details of approved parameters.

5.2 In particular, the advice from the Borough is summarised as follows.

Planning

5.3 The site is confirmed to be located within Site Specific Allocation (SSA) 12, which seeks the comprehensive, residential-led redevelopment of the A1306 corridor. While it is acknowledged that the proposal is not, strictly speaking, compliant with the policy (being for a single non-residential use), the proposal is considered to be in line with the broader aims and objectives of the policy and therefore acceptable in principle.

5.4 Although the application is in outline and the specific design detail is reserved, the Borough is generally satisfied with the approach taken in the visual representation of what could potentially be delivered on the site. This includes the proposed height and massing parameters, which are to be fixed in outline.

5.5 In terms of transport and access, the parking allocation is considered to comply with the maximum standard of Annex 5 of Havering's Development Control Policies DPD. Access to Rainham Village and public transport services is considered to be acceptable in the current context, while future development of adjacent sites will improve linkages to and from the site.

5.6 The site was identified as being within Flood Risk Zone 3a, which required the case officer to undertake a 'sequential test' to ensure the land use change and proposal is acceptable in flood risk terms. The Environment Agency was satisfied with this sequential test and their full comments are found later in this report.

5.7 Environmental considerations including air quality, odour and noise were all considered to be acceptable.

Highways

5.8 The Highway Authority first confirmed that they have no comments to make on the overall provision of car parking spaces. Their comments were centred on the proposed highway access and new road layout, which they ultimately considered to be acceptable subject to three conditions.

5.9 Two separate options were presented for the road junction to New Road. The first was a standard priority junction with ghost right hand turn lane. The second was a signalised junction. The Highway Authority stated that the signalised junction option was the only acceptable access arrangement for this development.

5.10 The three recommended conditions relate to details of the proposed alterations

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to the Public Highway, that the developer enter into the necessary agreement, notice or licence to enable alterations to the Public Highway and changes to the Public Highway be subject to a 4 stage safety audit.

Emergency Planning

5.11 The Risk Assessment provided by the applicants was analysed and was considered to be 'quite comprehensive' by the Borough's Emergency Planner. However, it was considered that further information covering the cited explosion examples as well as whether piling works during construction would have any impact on the pipelines.

5.12 Despite the application falling within a PADHI consultation distance that resulted in an 'advise against' response, the conclusion of the officer was that there was no problem with the development from an emergency planning point of view, providing appropriate consideration is given to some form of protection to the properties built.

Environmental Health

5.13 A condition to secure a ground contamination assessment has been recommended, but no other comments provided.

Greater London Authority

5.14 The GLA confirm that the proposal does not fall under the criteria of a strategic application and therefore do not intend to comment.

Environment Agency

5.15 As mentioned earlier in this report, the Borough and the EA have been in discussion regarding the sequential test applied to this proposal. This test was undertaken in order to confirm that an alternative site with lower risk of flooding was not available in the immediate surrounds. The findings of the test were that there are no sequentially preferable sites in the area and the EA accept this conclusion. Eight conditions were recommended to secure the following:

- Development to be carried out in accordance with the approved Flood Risk Assessment
- Submission of scheme dealing with risk posed by contamination
- Actions if unsuspected site contamination is found
- No use of piling or penetrative methods of foundation design
- Buffer zone of 8 metres along Poole's Sewer
- No light spill into watercourse or wildlife corridor
- Submission of a method statement for the long term management and eradication of Giant Hogweed
- Details of any proposed footbridge

5.16 Following the receipt of the EA's letter of consultation, the case officer asked for clarity on a number of points. To begin with, the first condition relating to the approved Flood Risk Assessment was exceedingly lengthy and involved three separate elements, namely a Flood Management Evacuation Plan, details of Sustainable Urban Drainage Systems and defined finished floor levels. It was

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suggested that these be broken into three separate conditions, as these elements are not directly related to one another, besides being flood related, and may hold up the submission of details should one element take longer to discharge than the others. The EA accepted this approach.

5.17 Officers also suggested to the EA that the fifth condition, relating to the eight metre buffer zone, be included in the landscaping condition, as this could easily be captured with this reserved matter. The EA did not agree to this and wish to see the details pursuant to a separate condition.

5.18 Clarity was also sought on the meaning of the eighth condition relating to details of foot bridges, as no bridges are proposed to cross the existing Rainham Main Sewer, but passive provision is provided. Bridges are proposed for the west to east drainage swale, however this is a man made feature and does not currently exist. The EA identified that the Concept Landscape Plan in the Ecological Appraisal shows two footpaths running either side of the drainage swale which then cross the Sewer, although these bridges are beyond the red line boundary of the application. The EA confirmed that this condition was added as a precautionary measure and if no bridges are intended to be constructed, the EA is happy for the removal of the condition.

Transport for London

5.19 TfL confirm that they have no objection to the proposal. It was considered that the application will not result in an unacceptable impact on either the Transport for London Road Network or the Strategic Road Network. No conditions or Section 106 obligations were requested.

Health and Safety Executive

5.20 The 'Planning Advice for Development near Hazardous Installations' (PADHI) system of risk assessment was applied to the application due to the presence of major hazard gas pipelines in the vicinity of the site. This advice concluded that there are sufficient reasons, on safety grounds, for advising against the granting of planning permission in this case. This is discussed in greater detail at paragraphs 9.25 to 9.33 (inc) below.

Metropolitan Police

5.21 The Borough's Crime Prevention Officer has recommended four conditions to secure the following:

- Secured by design scheme
- Car parking to comply with 'Park Mark Safer Parking' standards
- Details of boundary treatments
- A scheme showing CCTV systems

Other Consultation

5.22 Also consulted on the proposal were Essex and Suffolk Water, National Grid, Thames Water, Network Rail, EDF Energy, the RSPB, the LDA, Natural England and London and Continental Railways. No comments were received from these parties.

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6. APPLICATION PUBLICITY

- 6.1 Site Notice Expiry: 07/09/2009
6.2 Press Notice Expiry: 28/09/2009
6.3 Neighbour Notification: 18/08/2009

7. NEIGHBOUR REPRESENTATIONS

7.1 The application was advertised by press notice, site notice and neighbouring properties were notified by letter. At the time of writing, no neighbour comments have been received.

8. RELEVANT PLANNING POLICY

8.1 Planning Policy Guidance

PPS1 Sustainable Development
PPG13 Transport
PPG24 Noise
PPS23 Planning and Pollution Control
PPS25 Flood Risk

8.2 The London Plan, consolidated with alterations since 2004 (2008)

2A.8 Town Centres
3A.3 Maximising the Potential of Sites
3A.18 Protection and Enhancement of Social Infrastructure and Community Facilities
3A.25 Higher and Further Education
3C.1 Integrating Transport and Development
3C.2 Matching Development to Transport Capacity
3C.3 Sustainable Transport in London
3C.17 Reducing Traffic and Tackling Congestion
3C.21 Improving Conditions for Walking
3C.22 Improving Conditions for Cycling
3C.23 Parking Strategy
4A.1 Tackling Climate Change
4A.2 Mitigating Climate Change
4A.3 Sustainable Design and Construction
4A.4 Energy Assessment
4A.5 Provision of Heating and Cooling Networks
4A.6 Decentralised Energy: Heating, Cooling and Power
4A.7 Renewable Energy
4A.9 Adaption to Climate Change
4A.11 Living Roofs and Walls
4A.12 Flooding
4A.13 Flood Risk Management
4A.13 Sustainable Drainage
4A.19 Improving Air Quality
4A.20 Reducing Noise and Enhancing Soundscapes
4A.33 Bringing Contaminated Land Back into Effective Use

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4B.1 Design Principles for a Compact City
4B.3 Enhancing the Quality of Public Realm
4B.15 Archaeology
5C.1 Strategic Priorities for North East London

8.3 The London Borough of Havering Local Development Framework, adopted 28 May 2008

Site Specific Allocation

SSA12 – Rainham West

Development Control Policies DPD

DC26 – Location of Community Facilities
DC33 – Car Parking
DC34 – Walking
DC35 – Cycling
DC36 – Servicing
DC48 – Flood Risk
DC49 – Sustainable Design and Construction
DC50 – Renewable Energy
DC53 – Contaminated Land
DC58 – Biodiversity and Geodiversity
DC61 – Urban Design
DC63 – Crime

Core Strategy DPD

CP3 – Employment
CP8 – Community Facilities
CP9 – Reducing the Need to Travel
CP10 – Sustainable Transport
CP15 – Environmental Management
CP17 - Design

9. ASSESSMENT OF MAIN ISSUES

Principle of the Development

9.1 In policy terms, the most relevant guidance with respect to this site is Havering's Site Specific Allocation (SSA) 12, adopted in July 2008, which defines the approach to land use for the A1306 corridor from Ferry Lane to Manor Way. SSA12 seeks the comprehensive, residential led redevelopment of this length of land with 33% of the land area being dedicated to non-residential uses including employment, education, community, recreation and leisure uses ancillary to the residential. SSA12 goes on to identify a number of specific sites, including the application site, for comprehensive development only and not sites for single use applications.

9.2 Strategically, the London Plan states broadly through policy 2A.8 that community uses should sustain and enhance town centres and through policies 3A.18 and 3A.25 that education and higher education facilities should be located within easy reach of public transport facilities. These strategic policies generally reflect the

approach of PPG13 (Transport) in locating traffic-generating uses in town centres or in easy reach of public transport facilities and PPS6 (Planning in Town Centres) in locating uses that generate activity in town centres.

- 9.3 In assessing the principle of the development, it first must be acknowledged that the proposal does not align with the prevailing policy context. The principle is at odds with SSA12 in that the application is a single use proposal that seeks a non-residential use as the primary, rather than ancillary, use. It should also be noted that the application does not strictly align with the strategic policy approach on the preferred location of such activity-generating uses. However, with these factors in mind, a number of site specific and contextual aspects needs to be considered when deciding whether the principle of this use at this location is sound.
- 9.4 In the first instance, SSA12 seeks the residential-led redevelopment of this length of the A1306 on what was formerly the 'New Road Employment Area'. In 2006, the Havering Employment Land Review was undertaken to inform the emerging policies of Havering's LDF. The Review recommended that two thirds of the land within the New Road Employment Area be released to non-employment uses while the remaining third be released for residential compatible employment uses. This recommendation was the genesis of the 33% quota of non-residential found within SSA12. The residential element of SSA12 is led by the priority for housing in the area highlighted in Core Policy CP1. Therefore, although a single use application has been brought forward, the proposed use is one that delivers a development that would be sympathetic to and would not inhibit surrounding land use change to residential. Also, it is considered that over time the sites along the A1306 can still provide for the necessary number of residential units. Furthermore, the use enables the remaining warehouse buildings on site to be removed and replaced with a structure of greater consistency with the urban character that SSA12 seeks.
- 9.5 This education use, coupled with the Centre for Engineering and Manufacturing Excellence (CEME), also has the advantage of fulfilling an identified need and local policy objective of the Borough. The combined facilities will create greater education opportunities in one of the most deprived areas of London. The skills generated by the use will also be applicable in the London Riverside area where large tracts of land have been identified for land use change and will eventually lead to renewed construction activity. This has the potential to create a knock on effect of increasing the employment figures for the Borough and for east London.
- 9.6 In terms of the site's location, the strategic policy for the area seeks to position this type of use either within or adjacent to town or district centres. The assumption behind this policy approach is that uses such as education and local or district centres can have a symbiotic relationship, as the increase in activity generated by the use assists in stimulating the local economy while the local services and public transport usually found within centres serves the student population. This point was a particular area of concerns for officers early in the application process. It was felt that a better location for such a use would be on the Dovers Corner site to the east, as this site is closer to Rainham Village and is the subject of a residential-led application being considered by the Corporation but against substantial local opposition. To this end, both the applicant and the Corporation have been in discussions with the developer of Dovers Corner, Weston Homes, however these discussions have not resulted in any agreement between parties.
- 9.7 The applicant has also undertaken an exercise in search of a sequentially

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preferable site in the immediate area. While a number of sites are potentially available, none, except for Dovers Corner, could provide for a College of the size proposed. A total of four alternative sites were found, however these were considered to be either too small or too isolated to be fit for purpose. Overall, the situation surrounding Rainham militates against an alternate site. Within Rainham Village itself, all available sites are too small. Rainham Village also has the added complication of being a Conservation Area containing a number of listed buildings. The sites immediately surrounding Rainham Village are designated green belt and also at greater risk of flooding than the application site. The only other potential sites within the surrounding area are to the south of the railway line but are not fit for such a use in policy terms (being within a Strategic Industrial Location) and are also further isolated from Rainham Village and public transport services.

9.8 Whilst not the optimum location for the scheme, the current location is by no means unacceptable and, given its proximity to public transport links and its potential to be compatible with future residential schemes in the vicinity, it is considered that a reason for refusal based on acceptability of the use in this location could not be sustained. It should be noted that while the Dovers Corner site would, in theory, create a development site better located in relation to Rainham Village, at this point in time the development proposals for Dovers Corner do not make provision for the College. However, they do allow for an east-west pedestrian route which adjoins the proposed College site and would link directly into the Village. Additionally, while not directly adjacent to Rainham Village, the application site is not considered to be a great distance away. The route from Rainham Station to the site has been stated in the submitted Transport Assessment as being between 10-15 minutes. This has been verified personally by the case officer and found to be roughly 12 minutes. Furthermore, the route also has the benefit of a signalised pedestrian crossing on Ferry Lane next to the Tesco store and has also been the subject of street improvement, with separated pedestrian and cycle pathways along the length of the A1306. The distance from Rainham Village coupled with the improvements that have been implemented along the route suggest that students using the College would also make the most of facilities in Rainham Village without it being considered too far from their normal route. It should also be noted that as further developments along the A1306 come forward, a central green corridor will develop along the spine of the SSA12 policy area, thereby providing a more direct route to and from Rainham Village and the College.

9.9 It is acknowledged that the proposal does not perfectly align with the prevailing policy context for the area. However, in this particular case, considering the benefits of the use to the wider area, in providing modern facilities and more opportunities for students, it is recommended to Members that the principle of the use be accepted.

Scale Parameters

9.10 The submission includes a set of parameter plans which are before Members for approval. These can be found in Appendix 2 of this report. These show the extent of the height and scale of the buildings, however as this application is in outline, the specific design detail is a reserved matter and not considered at this juncture.

9.11 In terms of building footprint, the proposal is staggered to reflect various wings of the building and allows for a front open area and main entrance onto New Road

and a service bay on its western side. At their closest points, the buildings are proposed to be 42 metres from the northern boundary, 28 metres from the eastern boundary and 10 metres from the western boundary. These parameters are within a one metre tolerance. All other footprint parameters within these extremities have a two metre tolerance. The shape of the building footprint and the extent of site coverage allows for two site access roads and large open areas for landscaping and parking. Importantly, the extent of the building footprint allows ample room for a well thought out building to be delivered, particularly in the context of adjacent development sites.

9.12 The height parameters have been set at two separate levels; 17.5 metres above Finished Floor Level (FFL) or 20.35 metres Above Ordnance Datum (AOD) for the main buildings and 10 metres above FFL or 12.85 metres AOD for the linking wings between the main buildings. These heights are consistent with the surrounding built developments, both in terms of the adjacent industrial units and mixture of residential heights to the north of New Road. However, SSA12 seeks that new buildings should be predominantly three storeys in height. When allowing for 2.5 metres per storey plus 300mm per floor separation, the proposed building parameter ranges are roughly three storeys and six storeys. Although most of the built structure is within the six storey element, the heights themselves are not excessive and do not stand out against the surrounding built structures. The length to height ratio of the building coupled with the relatively limited site coverage also diminishes the perception of height.

9.13 On balance, the proposed buildings' extent in terms of scale is considered to be acceptable.

Access Parameters

9.14 The proposal seeks to establish the access points to the proposal by utilising the existing service road and by creating a new access extending to the rear of the site. The existing service road, which runs along the western boundary of the site, is intended to be for service and delivery vehicles only. The new access route, which will run along the eastern side of the proposed building, is intended for use by staff, students and visitors and terminates in a parking area for up to 200 cars (incl. 12 disabled spaces) on the site of Burnside House. In addition to the car parking spaces, the proposal includes provision for 230 cycle spaces and 10 motorcycle spaces. The specific details of internal circulation and parking layout are reserved.

9.15 The application is supported by a Transport Assessment which has analysed the traffic impact of the development. The proposed vehicle movements generated by the proposed use has been calculated using the TRAVL database and amounts to 2000 two way trips per day, with the peak movement times being between 0900 to 1000 and 1800 to 1900. These figures translate to a 3% daily increase in traffic volume along New Road.

9.16 As stated earlier in this report, Transport for London do not consider there to be an unacceptable impact on either the Transport for London Road Network or the Strategic Road Network. Similarly, the Borough's Highway officers do not consider there to be an adverse increase in traffic volume, although their response is centred more on highway safety concerns. In this respect, the applicant has submitted a Stage 1 Safety Audit for two proposed junction conditions for the access to New Road; a priority junction or a signalised junction. The Borough's requirement in

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terms of this treatment is for a signalised junction to be constructed. Although this is likely to result in traffic queues developing along New Road, these queues are well within the current capacity of New Road and will not result in traffic congestion. It is understood that the developer accepts this option and will meet the costs of implementation.

- 9.17 In terms of the service access to the site, the existing access has in the past accommodated HGVs associated with the former warehouse use. Therefore, it is not anticipated that significant works will be required to accommodate the servicing requirements of the College. Full details of the servicing will be secured as a reserved matter with a Delivery and Servicing Plan to be conditioned. Similarly, the details of construction traffic movements are reserved and will be secured by a condition requiring a Construction Logistics Plan.
- 9.18 The application also includes an Interim Travel Plan, which provides an outline of what the full Travel Plan will entail. This seeks to illustrate and promote more sustainable forms of travel by staff and students such as walking, cycling or public transport. The information supporting this Interim Travel Plan identifies four bus routes passing the site on New Road, times the walk to Rainham Village as being in the order of 10 to 15 minutes and provides information on train services from Rainham Railway Station. The full Travel Plan will be secured by condition.

Uses

- 9.19 As the application is for a single use, a use parameter plan has not been provided. However, an indicative plan showing the arrangement of different courses and ancillary uses is included with the application and can be viewed in Appendix 3.
- 9.20 Although the specific layout is a reserved matter, the general approach to the uses needs to be understood particularly considering the public/private interface of the building. One of the principle elements of the layout is the open area fronting New Road as well as the wing of the building that extends forward enclosing this space. The intention of this front space is that this will form a piazza in which students and members of the community can meet and interact. It is also proposed that the front element of the building will form a publically accessible sports hall and also provide facilities for higher education courses. Therefore, this front element of the College is intended to fulfil an important community function and is the public face of the campus.
- 9.21 Further into the building, some thought has already been given to the separation of courses. For example, construction based training is likely to give rise to greater noise and disturbance and is therefore considered to be better suited to the wings either side of the service bay, while the studio or classroom based courses are situated in the main building in the upper storeys. The significance of these indicative layouts is that it demonstrates that the building parameters can provide a flexible use of space internally and therefore will not inhibit the specific design considerations at the reserved matters stage.
- 9.22 In terms of delivery, it is likely that the front portion of the site can be constructed and operational before the main College building and facilities. The specific details of how this can occur is not clear at this time, however the opportunity to deliver the public facilities early is welcomed and can be secured by a phasing scheme to be agreed by the planning authority through a suitably worded

condition.

Landscape and Flood Risk

9.23 In terms of the existing landscape situation, the site is predominantly hard standing and provides no suitable habitats for statutorily-protected species of flora or fauna. An arboricultural survey was undertaken confirming that none of the existing trees on site are of sufficient significance or amenity value to warrant retention.

9.24 The proposals for the landscaping of the site are at this stage indicative only, but can be found in Appendix 3. The most important feature of the landscaping is the provision of a drainage swale running across the site, separating the car park from the rest of the campus. As stated in the consultation section of this report, extensive discussions have taken place with the Environment Agency on measures to alleviate the risk of flooding. The EA are satisfied with these proposals and have recommended conditions accordingly. This drainage swale is the first link in a linear open space that will eventually run along the length of the A1306 corridor, providing a pedestrian friendly route from the new developments through to Rainham Village while also acting as a habitat corridor to enhance the site for wildlife. The indicative landscape proposals also allow scope for living walls and roofs that will further enhance the biodiversity of the site. Therefore, while only in outline, the scheme presents and improvement in terms of landscaping, biodiversity and flood mitigation.

Proximity to High Pressure Gas Pipelines

9.25 As stated in the consultation section of this report, the presence of high pressure gas pipelines in the area has led the HSE (on the basis of their PAHDI response) to advise against the approval of this development. Specifically, three pipelines are located nearby; two to the south of the site and one to the north.

9.26 The two pipelines to the south of the site are located within the railway corridor on land that is not publically accessible. These are known as the Horndon-Barking pipeline (operated by Thames Power) and the Romford-Baker Street pipeline (operated by National Grid). The third pipeline is located along the northern boundary of the site and is known as the Mardyke-Ford Dagenham pipeline. The Romford-Baker Street and Mardyke-Fords Dagenham pipelines operate at a pressure of 33.1bar and the Horndon-Barking pipeline operates at 41.4bar. For context, a typical car tyre pressure is around 2 bar.

9.27 The high operating pressure of these pipelines has led to the HSE applying consultation distances on the land either side to determine the most appropriate land use for the risk that the pipelines present. These are separated into inner, middle and outer zones. For the purposes of the PADHI system, the proposed land uses fall under the category of DT1.2 – Parking Areas, DT2.4 – Indoor Use by Public and DT2.5 – Outdoor Use by Public. When applying these categories to the consultation distances, DT2.4 would only be allowed in the outer zone, DT2.5 would be acceptable in both the middle and outer zones and DT1.2 would be acceptable in all three zones. In other words, the College building would only be acceptable in the outer zone, the landscaped areas in the middle and outer zones and the parking areas in any zone.

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- 9.28 The Mardyke-Fords Dagenham pipeline running along the northern boundary of the site has the biggest implication in terms of risk. The middle consultation zone extends into the site, occupying 4,800m² of the application area. This includes the part of the northern most wing of the building intended for the sports hall. The inner zone also extends into the site and overlaps areas identified for the piazza, landscaping and the north tip of the building. If applying the PAHDI method of risk assessment in isolation, this leads to an 'advise against' development response.
- 9.29 The two southern pipelines do not present the same constraint to the development proposals. Although the outer zone of both pipelines and the middle zone of the Horndon-Barking pipeline overlap the southern portion of the site, the PADHI response under these circumstances is 'do not advise against', as the southern portion of the site is dedicated to car parking (category DT1.2 and DT2.5).
- 9.30 Circular 04/2000 advises Local Planning Authorities that they should not override the HSE's advice "without the most careful consideration" (see [paragraph A5 of Annex A]). In this instance, the applicant has provided a Risk Assessment Report in support of the application. This report goes beyond the scope of PADHI by reporting the specific pipeline specifications as provided by National Grid and Thames Power, extrapolating the implications on the consultation distances, modelling the risk and recommending mitigation that can further reduce the risk of pipeline failure.
- 9.31 A request by this risk consultant to National Grid revealed that the pipeline thickness of the Mardyke-Fords Dagenham pipeline exceeds the thickness assumed by the HSE, namely 9.52mm compared with the assumed thickness of 7.92mm. The consultant who undertook these investigations is seeking clarity on the correct thickness, however if the pipeline is found to be 9.52mm, the consultation distances may be reduced as a result. However, as the thickness has not been confirmed, the risk report assumes that pipeline thickness is 7.92mm and recommends two forms of mitigation, slab the pipeline and mark its presence above ground. The purpose of these techniques is to reduce the risk of an external party rupturing the pipeline, which is, according to the HSE, the most likely cause of high pressure gas pipeline failure. According to the Risk Report, if the Mardyke-Fords Dagenham pipeline were to be slabbed and marked, the implications for the consultation distances would mean that the inner zone would be removed altogether and the middle and outer zones would be reduced to such an extent as to no longer overlap any part of the building footprint.
- 9.32 As this application is in outline, there is greater opportunity for pre-commencement works to be undertaken as the detailed layout and design is yet to be established. It is therefore proposed that a condition is imposed to secure a scheme of mitigation for the Mardyke-Fords Dagenham pipeline, prior to the submission of reserved matters. This condition will be discharged in consultation with the HSE and will either confirm that the actual pipeline wall thickness does not warrant further mitigation or that mitigation can be agreed and applied.
- 9.33 The HSE will have 21 days in which to confirm that they accept this approach to the development or to request that the Secretary of State calls-in application for his own determination. It is the opinion of officers that, given that the scheme is outline and the potential for further analysis and mitigation to be secured by condition prior to the detailed design phase, there would not be sufficient grounds to warrant call-in. Members will however appreciate that this is officer opinion only and does not

pre-empt any decision of the HSE.

Air Quality

- 9.34 The London Borough of Havering is an Air Quality Management Area due to elevated mean concentrations of NO₂ and PM₁₀ in heavily trafficked areas. As such, the impact of this development on air quality needs to be given due consideration and is a material planning consideration.
- 9.35 An Air Quality Report accompanies the application and found that PM₁₀ levels are likely to rise during the construction of the development but not to levels that would be noticeable within the Borough's regular monitoring and review processes. This is largely attributed to the standard construction practices that are in place to minimise airborne particulate matter.
- 9.36 The report also found that the level of NO₂ will increase due to the added vehicle movements generated by the use, however this increase was considered so small as to be considered negligible.
- 9.37 The site is located close to the Thames Water Riverside Sewage Treatment Works. Modelling of the odour from the Works indicate that odour may be perceptible from the main car park in the southern end of the site but is not predicted to occur at the site of the main building.

Contamination

- 9.38 A desktop ground contamination study has been undertaken and concludes that the overall potential risk to future users of the site is moderate. In terms of risk to environmental receptors following the development of the site, the risk is deemed to be low to moderate. A condition to secure further ground contamination survey work and reporting will be imposed in line with the recommendation of the EA and the Borough's Environmental Health Services.

Sustainability and Energy

- 9.39 The proposal intends to achieve a BREEAM rating of 'Excellent' and to reduce the site's CO₂ emission by 20%. The options of renewable energy generation that have been explored in achieving this level include solar thermal, photovoltaic cells, wind turbines, biomass boilers, ground source heat pumps and combined heat and power plants. The two options that are intended to be applied are the combined heat and power (CHP) and an air source heat pump.
- 9.40 In terms of the CHP plant, this is a tried and tested technology that has the potential to generate a high proportion of the College's electricity, hot water and space heating. However, more information is required on the air source heat pump. Although air source heat pumps are often marketed as a low energy, sustainable source of heating, they require refrigerant which may be a source of ozone depleting chemicals, require external condensers which can be unsightly and noisy, and require electricity themselves to function. It is however acknowledge that the applicant has put forward these options as an indication of how the College may achieve these sustainability levels and therefore is not a matter that is fixed at this stage.

10. CONCLUSION AND REASONS FOR APPROVAL

- 10.1 The application before Members seeks to deliver a significant college campus within an area of search for such facilities. This report has acknowledged that the single use application is not strictly compliant with the adopted policy context for the area, particularly SSA12, however a rigid approach to policy may not always result in the best outcome for an area. When considering other material considerations, external factors and the surrounding context, this use and the benefit to the wider community is considered, on balance, to be acceptable and is recommended to be approved, subject to the conditions set out in Section 11.
- 10.2 Furthermore, Members will note that, if minded to agree the recommendation, the Corporation must allow the Health and Safety Executive 21 days in which to decide whether the decision to go against the advice of PADHI warrants a request for intervention by the Secretary of State.

11. CONDITIONS AND REASONS

1. The approved of details of the siting, design and external appearance of the buildings, the means of access thereto and the landscaping of the site (hereafter referred to as “the reserved matters”) shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of any works on site.

Reason: To ensure that the Local Planning Authority has control of those matters that have been reserved from the grant of this outline planning permission and in accordance with London Plan policy 3C.1, 4A.1 and 4B.3 and London Borough of Havering LDF policies DC61.

2. The reserved matters, as described in condition 1, shall be submitted to the Local Planning Authority for approval by no later than three years from the date of this outline planning permission and carried out as approved thereafter.

Reason: In order that the detailed matters are submitted within a reasonable time period and in accordance with Section 92 of the Town and Country Planning Act 1990 (as amended).

3. The development hereby permitted shall be commenced no later than the expiry of two years from the approval of the last reserved matters permission or the expiry of five years from the date of this outline planning permission, whichever is the later.

Reason: In order to comply with Section 92 of the Town and Country Planning Act 1990 (as amended).

4. At least 20% of the energy supply for the development shall be secured from decentralised and renewable or low-carbon energy sources (as described in the glossary of Planning Policy Statement: Planning and Climate Change (December 2007)). Details and a timetable of how this is to be achieved, including details of physical works on site, shall be submitted to and approved in writing by the Local Planning Authority as a part of the reserved matters submissions required by condition 1. The approved details shall be implemented in accordance with the approved timetable and retained as operational thereafter, unless otherwise agreed

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in writing by the Local Planning Authority.

Reason: In the interests of sustainable development and in accordance with London Plan policies 4A.14A.2, 4A.3, 4A.4, 4A.5, 4A.6 and 4A.7 and the London Borough of Havering LDF policies DC49 and DC50.

5. Prior to the submission of any reserved matters application pursuant to condition 1 of this permission, full details of the Mardyke-Fords Dagenham high pressure gas pipeline shall be submitted to the Health and Safety Executive, whereupon the PADHI Consultation Distances shall be finalised according to the submitted information. Should the submitted information result in no change to the Consultation Distances as currently depicted, a scheme of mitigation shall be submitted to and approved in writing by the Local Planning Authority, in consultation with the Health and Safety Executive. Such a scheme shall be implemented in full thereafter.

Reason: In the interest of health and safety and in accordance with the principles of risk management found in the HSE's PADHI system of risk advice.

6. Prior to the commencement of the development hereby permitted, a detailed phasing scheme shall be submitted to and approved in writing by the Local Planning Authority. The development shall be constructed in accordance with the phasing scheme thereafter

Reason: To prescribe the managed delivery of the proposal.

7. No phase of the development shall be occupied until full details of the community use of the indoor sporting facilities, including a Community Use Scheme has been submitted to and approved in writing by the Local Planning Authority. The Scheme shall include access policy, hours of use, access by non-College users/non-members, management responsibilities and include a mechanism for review. The approved Scheme shall be implemented upon commencement of use of that phase of the development.

Reason: In the interests of making sporting facilities available to the wider community and in accordance with the London Borough of Havering's LDF policies DC26 and DC28

8. No phase of development shall be occupied until details of the junctions and alterations to the Public Highway have been approved in writing by the Local Planning Authority. Approval shall only be given once the necessary agreements, notices or licences have been entered into and a 4-stage full road safety audit procedure as defined in HD 19/03 of the Design Manual for Roads & Bridges has been undertaken.

Reason: In the interests of ensuring good design, public safety and to comply with the London Borough of Havering's LDF policies CP10, CP17 and DC61.

9. Prior to the commencement of the development hereby approved, full details of the internal circulation routes, car parking, servicing arrangements, cycle parking and motorcycle parking shall be submitted to and approved in writing by the Local Planning Authority. The details shall also demonstrate how the parking arrangements comply with the Park Mark Safer Parking standard upon completion

of the development.

Reason: To ensure the site has adequate circulation routes for staff, students and visitors while maintaining the sufficient aesthetic quality, in accordance with London Plan policies 3C.23, 4B.1 and 4B.3 and the London Borough of Havering LDF policies DC33, DC34, DC35, DC36 and DC61.

10. The existing service access, or western access as depicted on plan number P107 rev B, shall be for delivery and service vehicles only and for no other vehicles.

Reason: In the interests of highway safety and in accordance with the London Borough of Havering LDF policy DC36.

11. Prior to the first occupation of the development hereby approved, a full Travel Plan setting out how staff, students and visitors will be encouraged to travel to and from the development by means other than the private car shall be submitted to and approved in writing by the Local Planning Authority. The approved Travel Plan shall be kept under review and may be amended from time to time provided that any amendments to it shall be first approved in writing by the local planning authority. The development shall be operated at all times in accordance with the approved Travel Plan.

Reason: In order to promote sustainable forms of transport to staff and students in accordance with London Plan policy 3C.2.

12. Prior to the first occupation of the development hereby permitted, a Delivery and Servicing Plan shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the site can be adequately serviced in the interests of the highway network and surrounding occupier, in accordance with London Plan policy 3C.17 and the London Borough of Havering LDF policy DC36.

13. Prior to the commencement of the development hereby permitted, a Construction Method Statement and Logistics Plan shall be submitted to, and approved in writing by, the Local Planning Authority. The approved Statement shall be adhered to throughout the construction period. The Statement shall provide for:

- a) the parking of vehicles of site operatives and visitors
- b) loading and unloading of plant and materials
- c) storage of plant and materials used in constructing the development
- d) the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate
- e) wheel washing facilities
- f) measures to control the emission of dust and dirt during construction
- g) a scheme for recycling/disposing of waste resulting from demolition and construction works

Reason: To ensure that the construction of the development does not cause undue disturbance to neighbouring occupiers or harm to the natural environment.

14. Prior to the occupation of the development hereby permitted, the Flood Management and Evacuation Plan detailed in the approved Flood Risk Assessment

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dated May 2009, reference number 15020/GE/RO1 (rev A), shall be undertaken to the satisfaction of the Local Planning Authority.

Reason: To reduce the risk of flooding to future occupiers of the site and in accordance with PPS25.

15. The development hereby permitted shall utilise Sustainable Urban Drainage Systems (SUDS) to attenuate surface water drainage, as detailed in the approved Flood Risk Assessment dated May 2009, reference number 15020/GE/RO1 (rev A), and shall include as a minimum,

- 4500m² of permeable paving for the large area of new car parking,
- the proposed swale, between 100-110 metres in length located between the proposed building and the proposed car park to provide ecological amenity as well as attenuation storage with restricted discharge rate to the Havering New Sewer
- Green roofs between 1500-1900m² providing rainfall storage and attenuation for small return period storms
- Rainwater harvesting

Reason: In the interests of sustainable urban drainage and flood mitigation and in accordance with PPS25.

16. Finished floor levels shall be no less than 2.85 metres AOD

Reason: To ensure the development is above the 1 in 1000 year fluvial flooding event and a safe and dry access/egress route to the A1306, in accordance with the guidance contained within PPS25.

17. Prior to the commencement of the development hereby permitted, the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved in writing by the Local Planning Authority:

- a) A preliminary risk assessment which has identified
 - i. All previous uses
 - ii. Potential contaminants associated with those uses
 - iii. A conceptual model of the site indicating sources, pathways and receptors
 - iv. Potentially unacceptable risks arising from contamination at the site
- b) A site investigation scheme, based on (a) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site
- c) The site investigation results and the details risk assessment (b) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken
- d) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in (c) are complete and identifying any requirements for longer term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Reason: To ensure the protection of human health and the prevention of pollution of the natural environment, in accordance with PPS23, London Plan policy 4A.33 and the London Borough of Havering LDF policy DC53.

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18. If, during the development, contamination not previously identified is found to be present at the site than no further development shall be carried out until an amendment to the remediation strategy detailing how this unsuspected contamination shall be dealt with, has been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the protection of human health and the prevention of pollution of the natural environment, in accordance with PPS23, London Plan policy 4A.33 and the London Borough of Havering LDF policy DC53.

19. Prior to the commencement of the development hereby permitted, a scheme for the provision and management of the buffer zone alongside Poole's Sewer shall be submitted to and approved in writing by the Local Planning Authority. Thereafter, the development shall be carried out in accordance with the approved scheme and any subsequent amendments agreed by the Local Planning Authority. The scheme shall include:

- Plans showing the extent and layout of the buffer zone
- Details of the planting scheme (using locally native species, of UK genetic provenance)
- Details demonstrating how the buffer zone will be protected during development and managed/maintained over the long term.

This buffer zone shall be measured from the top of the bank (defined as the point at which the bank meets the level of the surrounding land) and shall be free of structures, including hard stand and fences. All buildings including balconies and cantilevered structures must be set back at least eight metres from the bank top of the watercourse. Domestic gardens and formal landscaping should not be incorporated into this buffer zone.

Reason: In the interests of biodiversity and the naturalisation of the water body and in accordance with London Plan policy 3D.14 and the London Borough of Havering LDF policy DC58.

20. The location and direction of external artificial lighting within four metres of the top of the bank of the watercourse shall be such that the background luminance levels are maintained at between Lux level 0-2.

Reason: To minimise light spill from artificial lighting into the adjacent watercourse habitat, in accordance with London Plan policy 3D.14 and the London Borough of Havering LDF policy DC58.

21. Prior to the commencement of the development hereby permitted, a detailed method statement for the removal of long term management/eradication of Giant Hogweed on the site shall be submitted to and approved in writing by the local planning authority. The method statement shall include proposed measures to prevent the spread of Giant Hogweed during any operation such as mowing, trimming or soil movement. It shall also contain measures to ensure that any soils brought to the site are free of the seeds/root/stem of any invasive plant covered under the Wildlife and Countryside Act 1981. Development shall proceed in accordance with the approved method statement.

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Reason: The Ecological Appraisal Report recorded Giant Hogweed on the development site. Giant Hogweed is an invasive plant, the spread of which is prohibited under the Wildlife and Countryside Act 1981.

22. The reserved matters, as described in condition 1, shall demonstrate principles of Secured by Design in consultation with the London Borough of Havering Crime Prevention Officer.

Reason: In the interests of amenity and creating safer, stronger, sustainable places in accordance with London Plan policy 4B.6 and the London Borough of Havering policy DC63.

23. Prior to the occupation of the development hereby permitted, details of a CCTV system shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented and maintained thereafter.

Reason: In the interests of amenity and creating safer, stronger, sustainable places in accordance with London Plan policy 4B.6 and the London Borough of Havering policy DC63.

12. INFORMATIVES

1. The development is hereby notified that the grant of planning approval does not constitute approval for changes to the public highway. The Highway Authority will only give approval once suitable details of the changes to the public highway have been submitted, considered and agreed.

CASE OFFICER: Stephen Allen

Appendix 1: Site and Location Plans

Appendix 2: Proposed Parameters and Access Arrangements

Appendix 3: Indicative Land Use and Landscaping Plan