

PLANNING, DESIGN AND ACCESS STATEMENT

Moor Hall, Romford Road, Aveley, RM15 4UU

Witherslack Group Ltd

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1. Introduction

- 1.1. Broadgrove Planning and Development Limited have been instructed by Witherslack Group Ltd (the Applicant) to prepare an application seeking full planning permission to change the use of the dwelling/wedding venue to a specialist school at Moor Hall, Romford Road, Aveley, RM15 4UU ('the site'). The site will provide specialist education, therapy and residential accommodation for young people.
- 1.2. This Planning, Design & Access Statement details the proposals and addresses relevant issues and material planning considerations as identified in national and local planning policy.
- 1.3. This statement provides background about the applicant at Section 2; details the site and surroundings are provided in Section 3; planning history in Section 4; the development proposals are outlined in Section 5; relevant planning policy context is set out in Section 6; planning issues are discussed in Section 7; and conclusions in Section 8.
- 1.4. This Planning, Design & Access Statement should be read in conjunction with the following plans and reports which accompany the application:
 - Planning Forms and Certificate;
 - CIL Additional Information Forms;
 - Plans prepared by Witherslack Group Ltd –
 - 001 – Existing Site Layout
 - 002A – Proposed Site Layout (With existing overlay)
 - 003A – Proposed Site Layout
 - 004 – Existing House Layout
 - 005A – Proposed House Layout
 - 006 – House Elevations
 - 007 – Existing Outbuildings
 - 008A – Proposed Outbuildings
 - 009A – Outbuilding Elevations
 - 010A – OS Location Plan

- 011 – Proposed Fencing and Gates
- 012 – OS Plan including Local Authority Boundaries
- Extended Phase 1 Habitat Survey & Daytime Bat Survey;
- Arboricultural Impact Assessment;
- Transport Statement & Travel Plan;
- Environmental Noise Impact Report;
- Air Quality Assessment;
- Preliminary Contamination Risk Assessment.

1.5. All the information necessary to determine the application should be found within these supporting documents.

2. About Witherslack Group

- 2.1. Witherslack Group is the UK's leading provider of specialist education and care for children and young people with a range of special needs including, communication difficulties (autistic spectrum conditions, Asperger's Syndrome, speech, language and communication needs) and complex learning needs.
- 2.2. Witherslack Group operates specialist schools, children's homes, and vocational training centres. The Group currently operates 29 schools, 24 children's homes, 3 vocational training centres and 7 integrated children's homes and learning centre facilities.
- 2.3. The Group has expanded significantly and successfully over a number of years and now provides care and education for over 1400 young people, employing more than 2000 staff at its establishments in the North East, Yorkshire, Oxfordshire, Wiltshire, Windsor, the Midlands and the North West of England.
- 2.4. Witherslack Group is the highest rated independent provider by Ofsted; the group's commitment to quality is evident throughout all that they do.
- 2.5. Witherslack Group's objective is to provide high quality specialist provision, underpinned by generous staffing ratios. This will allow vulnerable young members of society to maximise their potential within a highly supported and caring environment.

3. Site and Surrounding Area

- 3.1. The application site comprises an existing dwelling and out-buildings in various uses. The site has and most recently been operating as a wedding venue for up to 40 occasions a year. When not hosting weddings, the main dwelling has been occupied as a family home.
- 3.2. The site falls within the Metropolitan Green Belt and forms part of the Thames Chase Community Forest. The site is also designated as a site for Minerals Safeguarding.
- 3.3. The surrounding area is mainly characterised by agricultural land, forested areas and scattered development, although north of the site is a consolidated industrial area. There are residential cottages within, directly north and further north of the site, whilst Moor Hall consists of a large 3-storey detached dwelling.
- 3.4. Outbuildings currently within the application's demise include converted cottages; a large marquee used for wedding receptions with rear timber storage area; a helipad and helicopter hanger; a garden store; and a marquee hut. Internal hardstanding provides connectivity between the respective structures on site, as well as parking for associated uses.
- 3.5. Soft landscaping features throughout, with existing trees and maintained garden areas surrounding Moor Hall and its associated outbuildings.
- 3.6. The area directly north of Moor Hall has a number of former agricultural and industrial buildings, which are occupied by an active commercial/industrial use, with warehouses, sheds and storage areas spread across a hard landscaped area. Adjacent to Moor Hall Farm, beyond the northwest corner of the application site, are a pair of residential dwellings known as No.'s 39 and 40 Moor Hall Cottages.
- 3.7. Access to the site is from Romford Road via a private access road which is approximately 650m long. The access serves Moor Hall as well as the neighbouring commercial buildings and dwellings.
- 3.8. Having regard to the Gov.UK 'Flood Map for Planning', the site is located within Flood Zone 1 (low probability of flooding).

4. Planning History

- 4.1. The current application is submitted following the withdrawal of previous application P0390.22 on 22 September 2022. The previous application sought a change of use from dwelling and wedding venue to an Integrated Therapeutic Learning Centre, including demolition of existing buildings, conversion of the main building and the erection of three additional buildings to be used for Children's Homes for children with special educational needs including access and the provision of 76 car parking spaces, the provision of multi-use game area (MUGA), associated 3m high secure fencing.
- 4.2. The application was withdrawn following feedback received from the LPA and Greater London Authority (GLA) which identified several issues with the scheme as submitted and confirmed that the proposed development could not be supported in its current form.
- 4.3. The development sought to demolish the existing buildings onsite (apart from the main house which was to be retained and converted) and to erect 3 new children's homes. The scheme sought to increase floor space from 854sqm to 1,762sqm which represented a 106% increase. The development was considered to amount to inappropriate development that would not preserve the openness of the Green Belt. The application was submitted with information to demonstrate the local need for the facility, however the GLA considered that the presented case did not amount to very special circumstances and that additional supporting information would be required.
- 4.4. Both the Council and the GLA required the submission of information to demonstrate the need for the proposed school to be located on this Green Belt (sequential test). Even if very special circumstances were presented to demonstrate the use of the site, it should be established that there are no other more suitable sites in the wider area that could serve the same function.
- 4.5. Lastly in relation the Green Belt, the proposals did not provide a clear assessment of the impacts of the proposals on the openness of the Green Belt.
- 4.6. In relation to transport, the proposals were considered to be unsustainable given the reliance on private cars. Further analysis of the existing and proposed uses would be required to justify any intensification of the site. The level of parking and needs to be justified based on usage and pedestrian and cycle provision improved.

- 4.7. Other issues raised related to the loss of a single-family home and the loss of greenery/landscaping.
- 4.8. Lastly a procedural matter was identified. As part of the access from the public highway lies within Thurrock, a parallel application is required to be submitted to Thurrock Council.
- 4.9. The application site has been subject to several other planning applications which are relevant to the current proposal. These are set out below:
- 4.10. P1730.02 - Single storey sun lounge and swimming pool enclosure – Approved with conditions 25/11/2002
- 4.11. P0510.11 - Conversion of existing double garage and garden store to 2 no. one bedroom bungalows – Approved with conditions 19/05/2011.
- 4.12. P1004.12 – Change of Use of part rear garden area for temporary marquee for wedding receptions – Approved with conditions 24/10/2012.
- 4.13. P0432.14 - Partial Change of Use of existing dwelling to provide a wedding ceremony and reception area – Approved with conditions 21/05/2014.
- 4.14. P1029.17 – Variation of condition 4 attached to planning permission reference: P1004.12 (change of use of part rear garden area for temporary marquee for wedding receptions) to allow an increase in the number of wedding receptions from 20 to 40 per year – Approved with conditions 15/06/2017.
- 4.15. E0027.22 – Lawful Development Certificate seeking the retention of the existing timber structure to the rear of the marquee – positive certificate issued 20/10/2022.
- 4.16. P1378.22 - Variation of Condition No. 2 of Planning Permission Ref: P1029.17 dated 15/06/2017 to remove the need to dismantle the marquee outside its operational hours. (Variation of condition 4 attached to planning permission reference: P1004.12 (change of use of part rear garden area for temporary marquee for wedding receptions) to allow an increase in the number of wedding receptions from 20 to 40 per year) – Application refused 20/10/2022.
- 4.17. The planning history indicates that Moor Hall has historically been used as a dwelling with associated outbuildings (Use Class C3) but has the benefit of recent approvals which have partially changed its use to a wedding venue.
- 4.18. This forms the basis for the change of use of the site to the proposed educational use.

5. Proposed Development

Use

- 5.1. The proposals will provide a new primary school for children with special educational needs (SEN) – Use Class F1 (a) the provision of education.

Amount

- 5.2. The proposal seeks to utilise the existing floor space of the dwellinghouse for conversion into the main school. This measures 624sqm.
- 5.3. The proposal also seeks the conversion of existing outbuildings into additional classrooms and associated uses with the school, such as offices, reception and meeting rooms. This includes existing cottages (104sqm), hangar (126sqm) and timber structure to the rear of the marquee (110sqm). The marquee itself (446sqm) is proposed for removal.
- 5.4. The total GIA proposed for a change of use is therefore 964sqm.
- 5.5. The proposals also include the erection of a 20m x 10m Multi-Use Gaming Area (MUGA) due east of the site, with 2.4m perimeter paladin type fencing, rising to 3m behind each goal, and associated works. The surface will be tarmac/sports surface. The proposals include the installation of floodlights at each corner, rising to a height of 4.5m.
- 5.6. 64 no. car parking spaces are proposed to support the development, inclusive of 4 no. disabled spaces and 5 visitor spaces. These are within the main parking area to the northwest of the site. Additionally, 3 no. minibus spaces are provided at the site's eastern boundary, just north of the proposed MUGA. A cycle store is also proposed close to the minibus parking.
- 5.7. 56 pupils will attend the proposed school, with 42 full-time staff supporting its operation.

Scale

- 5.8. See proposed elevations and sections. No changes to the scale of the existing Moor Hall dwellinghouse are proposed, maintaining its part one-storey and three-storey form.
- 5.9. See proposed outbuilding elevations. No alterations to the respective scales of the existing cottages, hangar or timber structure are proposed.

Appearance

- 5.10. The appearance is shown on the existing and proposed elevations for Moor Hall. No alterations are proposed to the elevations facing east and south; accordingly, their appearance will remain the same.
- 5.11. Regarding the elevation facing west, changes are sought to incorporate one new door into the scheme. This is in place of an existing window.
- 5.12. Regarding the elevation facing north, a new door is proposed adjoining an existing door, doubling the point of access. Its external appearance will mirror that of the neighbouring door.
- 5.13. In summary, the minor changes being sought to the external appearance of the Moor Hall do not materially affect its current character.
- 5.14. The appearance for the external outbuildings is shown in the 'outbuilding elevations' document.
- 5.15. For the cottages, only changes to the front elevation are proposed. This is a minor change involving the infilling of an existing doorway with brickwork that matches the existing brickwork of the cottages.
- 5.16. For the hangar, only changes to the front elevation are proposed. This involves the removal of the existing shutter door for infilling with timber to match the existing form, and the creation of 2 new windows, again matching the existing form.
- 5.17. For the timber outbuilding next to the marquee, changes are proposed at three facings:
- 5.18. At the front elevation, the formalising of this elevation with new cladding, windows and doors is proposed, as, at present, this part of the structure is exposed owing to its current relationship with the marquee.
- 5.19. At one side elevation, a new widened window is proposed in place of an existing window.
- 5.20. At the rear elevation, 2 no. separate, single doors are proposed – one in a new location and a second in place of an existing double door. A slightly relocated and widened window is also proposed at this elevation.
- 5.21. The appearance of the MUGA is indicated on the 'proposed fencing and gates' plan.

Access

- 5.22. Vehicular access arrangements to the site will be via the existing surfaced private access track which connects to the local highway network via Romford Road, within Thurrock Council's demise. Widening within the Applicant's demise is proposed for safety reasons, extending the drive to a width of 5.5m. This also allows for a new pedestrian footpath within the site leading from the proposed gated entrance. Other pedestrian links are proposed within the site, connecting the main building with outbuildings and parking areas.
- 5.23. Existing electrically operated gates and adjacent fence are proposed for removal, to be replaced by new automatic gates near the site's vehicular entrance.
- 5.24. Existing accesses to Moor Hall will be maintained, with the addition of new doors at western and northern elevations.
- 5.25. Accesses into the respective outbuildings are proposed in accordance with the elevational changes set out above.

Description of Development

- 5.26. The proposed description of development for this planning submission is as follows:

'Change of use from dwelling and wedding venue to school for children with special educational needs (F1 (a) use), including conversion of external outbuildings, access, parking for 64 vehicles and 3 minibus bays, the provision of a multi-use gaming area (MUGA) and associated landscaping, and works necessary to facilitate the change of use'.

6. Planning Policy Framework

- 6.1. Paragraph 11 of the National Planning Policy Framework requires (in accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004) and Section 70(2) of the Town and Country Planning Act 1990), that planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise.

Development Plan

- 6.2. The development plan consists of the Havering Borough Council Local Plan 2016 – 2031 (adopted November 2021). The following policies are relevant to the proposed development:

- Policy 7 – Residential design and amenity.
- Policy 16 – Social Infrastructure.
- Policy 17 – Education.
- Policy 24 – Parking provision and design.
- Policy 26 – Urban design.
- Policy 27 – Landscaping.
- Policy 28 – Heritage assets.
- Policy 30 – Biodiversity and geodiversity.
- Policy 33 – Air quality.

The London Plan

- 6.3. The London Plan (adopted in March 2021) sets out the spatial development strategy for the 32 London Boroughs. The following policies are relevant to the proposed development:

- Policy D5 – Inclusive Design;
- Policy S1 – Developing London’s social infrastructure;
- Policy S3 – Education and Childcare Facilities;
- Policy HC1 – Heritage conservation and growth;
- Policy G2 – London’s Green Belt;
- Policy G6 – Biodiversity and access to nature;

- Policy G7 – Trees and Woodlands;
- Policy SI 1 – Improving Air Quality;
- Policy T6 – Car Parking.

National Planning Policy Framework (July 2021)

- 6.4. At a national level, planning policy and guidance is contained in the National Planning Policy Framework (NPPF). The updated NPPF (July 2021), sets out the Government’s vision for future growth. The NPPF must be considered in the preparation of local and neighbourhood plans and is a material consideration in planning decisions.
- 6.5. The NPPF acknowledges that planning policies and decisions should play an active role in guiding development towards sustainable development solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.
- 6.6. Paragraph 8 states that there are three dimensions to sustainable development: economic, social and environmental and, as set out in paragraph 9, these provide broad objectives to be delivered through planning decisions.
- 6.7. At the heart of the NPPF is a presumption in favour of sustainable development as set out in paragraph 11. This means that local planning authorities should “approve development proposals that accord with the development plan without delay and where the development plan is absent, silent or relevant policies are out-of-date, grant permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits”.
- 6.8. Paragraph 20 of the NPPF states:
- “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:*
- ... c) community facilities (such as health, education and cultural infrastructure);...”*
- 6.9. Chapter 4 outlines how Local Planning Authorities should approach decisions on proposed developments. It sets out that the approach should be positive and creative and that decision-makers at every level should seek to approve applications for sustainable development where possible.
- 6.10. Paragraph 47 states that,

“Planning law requires that applications for planning permission be determined in accordance with the Development Plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.”

- 6.11. Paragraph 111 states “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”.
- 6.12. Chapter 11 concerns the effective use of land, and obliges planning policies and decisions to encourage as much use as possible of previously-developed or ‘brownfield’ land. Local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs.
- 6.13. Paragraph 126 states that *“The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.”*
- 6.14. Paragraph 130 seeks developments that function well and add to the overall quality of the area, are visually attractive as a result of good architecture, are sympathetic to local character and history and create places that are safe and inclusive.
- 6.15. Chapter 13 concerns the Green Belt and which the Government attached great importance to the protection of. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
- 6.16. Inappropriate development is considered, by definition, harmful to the Green Belt and should only be approved where there are very special circumstances.
- 6.17. Paragraph 149 expects a local planning authority to regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

“a) buildings for agriculture and forestry;

b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;

- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
- e) limited infilling in villages;*
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and*
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:*
 - not have a greater impact on the openness of the Green Belt than the existing development;*
 - or*
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.*

6.18. Paragraph 150 also sets out forms of development which are not considered inappropriate in the Green Belt, inter alia:

- “d) the re-use of buildings provided that the buildings are of permanent and substantial construction;*
- e) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds)”*

6.19. Chapter 16 relates to the historic environment. Planning applications potentially affecting heritage assessed are required (paragraphs 194 and 195 require) to describe the significance of the heritage asset in question in a level of detail sufficient to accurately predict the potential impacts of the development. Paragraph 203 states,

“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

7. Planning Assessment

7.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires Local Planning Authorities to determine planning applications in accordance with the Development Plan, unless material considerations indicate otherwise.

7.2. The key planning issues are considered in turn below.

Principle of Development

7.3. NPPF paragraph 150 sets out that, providing they preserve its openness and do not conflict with the purposes of including land within it, the reuse of buildings of permanent and substantial construction in the Green Belt is not considered to be inappropriate development. In addition, material changes of use to land are not considered to be inappropriate development.

7.4. As seen in the existing site plan, the site currently features the main Moor Hall dwelling, as well as a number of outbuildings scattered across the site. This includes a large marquee with a rear timber building, a helicopter hangar, 2 no. 1-bedroomed cottages and storage areas.

7.5. The proposed development seeks the conversion of Moor Hall, the helicopter hangar, the cottages and the rear timber building to the marquee, but not the marquee itself, which is proposed for removal. A positive certificate of lawfulness has recently confirmed the permanence of the timber structure to the rear of the marquee.

7.6. As such, the reuse of the existing buildings is appropriate. In addition, the material change of use of the site to education is acceptable, the outside spaces will be used to allow for outdoor play, recreation and sports as well as providing formal parking areas to facilitate the use.

7.7. The proposals also include the provision of a Multi-Use Gaming Area (MUGA). Whilst new buildings are considered inappropriate in the Green Belt, NPPF Paragraph 149 sets out that the provision of appropriate facilities for outdoor sport and recreation associated with an existing or proposed use are acceptable providing the facilities preserve openness.

7.8. The proposed MUGA is to be located alongside the eastern boundary of the site in an area that currently comprises a lawn with a pergola, the lawn is enclosed by high hedging on three sides. Given the enclosed nature of the site, it is considered that the introduction of the MUGA with sports mesh fencing surround will preserve the openness of the Green Belt in this location.

- 7.9. Some limited vegetation and trees are proposed for removal to allow for the proposed car parking and internal access arrangements. However, this application retains a much greater proportion of the existing landscaping compared to the previous, withdrawn application, ensuring no resultant harm to the Green Belt.
- 7.10. In summary, the proposed educational use is considered acceptable in principle in the site's Green Belt location, as the proposed development will have no greater impact on openness compared to the existing situation.
- 7.11. Furthermore, as the site is currently used jointly as a dwelling and a wedding venue, the net loss of one residential unit for the proposed educational use must be considered.
- 7.12. The change of use will result in a minor reduction to Havering's housing supply. Against this, are numerous benefits that the scheme will bring:
- The creation of a high-quality learning environment for 56 pupils with special educational needs.
 - Additional SEN school places introduced, easing placement pressures on local educational authorities both locally and nationally.
 - The introduction of 42 jobs to support the proposed use, offering opportunities for employment in specialist teaching as well as pastoral care, therapeutic care, maintenance, catering, cleaning and administrative roles.
 - The re-use and conversion of buildings within the site negating the need for any new construction, bringing environmental benefits.
- 7.13. The considerable benefits of the scheme are deemed to outweigh the loss of the residential unit at the site.
- 7.14. Considering the above, the proposed change of use is considered acceptable in principle.

Highways, Access & Parking

- 7.15. Given that the proposals are for a specialist school, the transport characteristics are different from that of a traditional school. It is acknowledged that highway, impact, access and parking is one of the key issues in relation to the proposal to change the use of the application. As such, the application is submitted with a Transport Statement & Travel Plan prepared by TTC.
- 7.16. The special educational needs of the proposed end users means that a higher level of care is necessary when transporting them to and from the proposed development. Using public

transport, cycling or walking would not be suitable modes for doing so. Additionally, the larger catchments from which the specialist nature of the end use attracts, also reduces the potential to utilise non-car modes of travel.

- 7.17. In addition, the specific labour requirements of the proposed end use are also different to a traditional school. Witherslack Group use generous staffing ratios, which has underpinned their success as the leading provider of specialist education for children and young people with special educational needs.
- 7.18. Given that the SEN setting requires specialised training, the labour pool is incomparably smaller than that of mainstream schools for teachers and staff members. Geographically, teachers and support staff (as well as pupils) can be expected to travel and commute longer distances to the proposed development.
- 7.19. In consideration of the proposed SEN provision, attendees, teachers and support staff are likely to travel to / from the development via private car and from a wide commuting catchment zone. This is evident at other Witherslack sites around England, examples of which can be provided by request.
- 7.20. In recognition of the specific use, to determine the traffic movements that could be generated from the proposed development, trip rates have been established using Manual Turning Count (MTC) traffic data recorded at the Lakeside School operated by Witherslack, that is comparable to what is proposed at the site.
- 7.21. The application of the Lakeside School trip rates could result in a worst-case traffic forecast of 64 and 35 two-way movements in the respective school AM and PM peak hours. 17 and 12 two-way vehicle movements could occur in the typical network AM and PM peak periods.
- 7.22. Whilst the site's existing part use as a wedding venue could have generated significant vehicular movements at certain points of the year, as set out in the TS, it is noted and accepted that the existing movements would unlikely arrive / depart during typical AM and PM period periods and would also occur during weekends.
- 7.23. Notwithstanding, given the school peak hours do not overlap with the typical network peak hours, it is concluded that the effect of proposed development traffic will not result in conditions prejudicial to the safe operation of the local highway network.
- 7.24. Furthermore, the development generated traffic does not take into account any Travel Plan mode shift measures, which are offered in detail in Section 6 of the Transport Statement. The

implementation of said measures can be secured by suitably worded planning condition and will encourage more sustainable journeys to site for staff that are based locally, further reducing any traffic impacts.

- 7.25. Similarly, section 2 of the Transport Statement demonstrates that site is well located to benefit from a good level of walking and cycling infrastructure. The site is frequently served by nearby bus services and there are no outstanding highway safety issues which the proposed development is expected to exacerbate.
- 7.26. Regarding access to the site, the development site has been served by a private access road from Romford Road, which has in operation for a number of years and has accommodated the traffic associated with the existing wedding venue use and adjacent commercial properties without any operational or highway safety concerns.
- 7.27. As a result of the above, there are no proposals to modify the existing Private Access Road nor provide a pedestrian facility between Romford Road and the proposed development in consideration of the nature of development proposals, forecast travel demand and low existing traffic movements on the private access.
- 7.28. Vehicle tracking has been undertaken of the Private Access Road and internal arrangements for a large private estate car, mini-bus and Refuse Collection Vehicle (RCV). The vehicle tracking is illustrated on Drawing 210509-002 included in Appendix B of the TS.
- 7.29. The internal layout of the site will be altered to offer a one-way system whereby vehicles entering the site will route via the entrance to Moor Hall before looping round and exiting via the existing vehicle access. The internal layout will be informed by signage and demarcated on the approach to Moor Hall and can be seen in the proposed layout provided in Appendix A of the TS.
- 7.30. A vehicle tracking for an RCV has been undertaken using an 11.2m x 2.53m RCV (Phoenix 2 Duo Recycler 6x4 chassis) for robustness. This demonstrates the RCV can arrive and depart the site in forward gear with no constraints. A copy of the vehicle tracking exercise is provided in Appendix B.
- 7.31. The proposed development will provide a total of 62 no. parking spaces, it is anticipated that there will be approximately 42 no. members of staff. A total of 4 no. disabled parking bays are to be provided on site, as well as 3 no. minibus parking bays. 11 no. Electric Vehicle Charging Points are proposed within the parking area.

- 7.32. The proposed level of parking provision has been set on operational requirements based on the operator's experience of similar sites nationwide. The proposed parking provision is considered accurate and robust for the operator's needs.
- 7.33. The proposed development will provide a minimum total of 10 no. staff cycle spaces in a secure location near to the proposed MUGA, 2 no. short-term visitor cycle spaces and 1 no. oversized cycle space, in accordance with London Plan standards.
- 7.34. NPPF Paragraph 111 sets out that 'development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe'.
- 7.35. In recognition of the above, it is evident that there would be no unacceptable impact to highway safety nor any severe residual cumulative impacts to the road network. Highways should therefore not be a prohibitive factor in the positive determination of the proposed development.

Heritage

- 7.36. Moor Hall is identified in the Council's Heritage Supplementary Planning Document as a Building of Local Heritage Interest. Non-designated heritage assets are those which have local interest, but not sufficient heritage significance to warrant being listed. Policy 28 sets out that a local list of non-designated heritage assets will be identified and maintained, in accordance with agreed criteria. Their significance and value will be recognised accordingly.
- 7.37. In line with Chapter 16 of the NPPF, the effect of a planning application on the significance of non-designated heritage should be taken into account when determining the application. The proposed use would make effective use of the Moor Hall. The appearance and aesthetic of the historic building will be largely unchanged. Minor external alterations are proposed including the creation of a double doorway in place of an existing single door to improve accessibility and the addition of a new door on the newer extension. Sensitive alterations to the internal arrangement are proposed to facilitate the proposed use.
- 7.38. The significance of Moor Hall would not be harmed by the proposed change of use, minor external alterations or conversion of the outbuildings, which too will retain the same character. The provision of a viable use will enable the upkeep of the property and allow it to retain its local heritage interest.

- 7.39. In summary, heritage should not be a prohibitive factor in the positive determination of the proposed development.

Design

- 7.40. Policy 26 requires that new development maintains or improves the character and appearance of the local area in its scale and design. It should provide a high standard of inclusive design so that it is accessible to people of all ages.
- 7.41. Moor Hall will largely keep the same appearance and adapted to meet the demand of the new educational use. The outbuildings will also retain the same appearance as existing, with the temporary marquee removed to facilitate some new parking spaces as well as allowing for part of the site's garden area to be reclaimed. Therefore, the character of the site will be protected and enhanced.
- 7.42. Fencing will be provided around the MUGA and will have a height of 2.4m along the sides to improve visibility and across the site and for spectators. The fencing will then increase to a maximum height of 3m behind the goals, with small floodlights in each corner raising to a height of 4.5m.
- 7.43. Some existing trees and vegetation will be removed for car parking, internal access arrangements and for management purposes; however, ultimately, the character of the site will be maintained. The retained landscaping will be augmented by a comprehensive landscaping scheme, details of which can be secured by condition.

Trees

- 7.44. Due to the presence of trees on site, the application is accompanied by an Arboricultural Impact Assessment (AIA), Tree Constraints Plan and Arboricultural Impact Plan prepared by SEED Arboricultural.
- 7.45. It is noted that no trees on site are subject to a Tree Preservation Order (TPO). Notwithstanding, a tree survey was undertaken at the outset of the project, to classify trees and their respective Root Protection Areas (RPAs). This allowed the incorporation of trees into the scheme where feasible.
- 7.46. The overall survey recorded 58no. individual trees and 5no. groups. These include 3no. category A trees, 23no. category B trees, 31no. category C trees, 1no. category U tree and 5no. category C groups.

- 7.47. In order to implement the Proposed Development, there will be a loss of 10 no. category B trees, 15 no. category C trees and 1 no. category U tree. No category A trees are proposed for removal. This impact represents a significant betterment to the previous scheme which proposed the removal of 37 individual trees (including a category A tree) and 4 tree groups.
- 7.48. The loss of higher-quality trees has only been progressed where crucial: for car parking, improvements to the site's access and for internal access arrangements.
- 7.49. Whilst there are also new incursions into the Root Protection Areas of 3 no. trees and 1 no. tree group, the AIA sets out working mitigatory methods to ensure no unacceptable impacts arise to these trees.
- 7.50. The AIA also sets out an overview of best-practice methods that will ensure protection to the retained trees. Full details of tree protection measures including construction methods, schedule of arboricultural supervision and specific forms of tree protection can be secured by inclusion of suitably worded condition post-approval.
- 7.51. The Applicants have sought to minimise any impacts to trees on site and considered them throughout the scheme's formation. As such, trees should not form a prohibitive factor in determining the application positively.

Ecology

- 7.52. This application is accompanied by an Extended Phase 1 Habitat Survey and Daytime Bat Survey prepared by Rachel Hacking Ecology which provides an overview of the habitats present on site and considers the impacts of the development.
- 7.53. The Phase 1 survey identified that some of the buildings on sites have the potential for bat activity. Therefore, a Daytime Bat Survey was conducted further to the initial findings, identifying no evidence of bat occupation or activity across the site. The existing buildings are well sealed and maintained, offering only negligible suitability. No further bat surveys are considered necessary.
- 7.54. The trees, scrub and hedgerows on site offer suitable bird nesting habitat. Therefore, the report recommends any works to potential nesting habitats be undertaken outside the bird nesting season (which is generally March – August) unless a nesting bird survey is undertaken first.
- 7.55. Rhododendron has been identified within the shrub beds on site. This is an invasive, non-native species, and is listed as on Schedule 9 Part II (plants) of the Wildlife and Countryside

Act 1981 (as amended). It is recommended that this species is either managed to ensure it does spread off-site, or it is removed from the site using a recognised methodology prior to or during site clearance work. This can be secured by condition.

- 7.56. No statutory or non-statutory protected sites lie within the proposed development site or immediately adjacent to the site.
- 7.57. General recommendations to enhance the biodiversity value of the site have been noted and will be incorporated into the scheme:
- Soft landscaping should include the provision of native and non-native flowering perennial species, to provide a pollen and nectar source for invertebrates.
 - Bird and bat boxes should be erected on the newly constructed buildings or retained trees where possible.
 - Trees planting of native species where practically possible.

- 7.58. The ecological studies at the site also identified sensitive information that is not to be disclosed publicly. This is submitted to the local planning authority and to be treated as confidential. No summary of this document will be provided, however, in accordance with the findings of said document, this should not be a prohibitive factor in the consideration of the proposed development.

Noise & Amenity

- 7.59. This application is submitted with an Environmental Noise Impact Report prepared by Soundtesting. The report sets out the findings of the noise survey which was carried out to assess the impact of commercial/industrial noise, as well as other general noise within the local environment, on the proposed educational development.
- 7.60. The survey identified that the dominant noise sources at the site were from general road traffic and light aircraft. The noise from the adjoining commercial use was less significant.
- 7.61. The report demonstrates that the existing glazing at the proposed educational development will provide suitable façade sound insulation such that the upper limits for internal ambient levels set out in BB93 would not be exceeded as a result of the existing environmental noise climate.
- 7.62. The site is bounded on three sides by open land, to the north is the commercial use which does not cause noise disturbance to the site and would not be impacted by the educational

use. The two cottages to the north of the site are located are sufficiently separated from the site to ensure residents won't be affected by way of noise, light or loss of privacy. Compared to the current part use as a wedding venue, use of the access in unsociable hours will be reduced which will be beneficial in terms of amenity.

- 7.63. In summary, the proposals will not be harmful to neighbouring amenity.

Air Quality

- 7.64. The application is submitted with an Air Quality Assessment (AQA) prepared by Miller Goodall. The report provides a review of existing air quality at and around the proposed development and assesses the potential impact of the proposed development on local air quality. It is noted that the whole of Havering borough was declared an AQMA in 2006.
- 7.65. The assessment of dust soiling and human health impacts during the construction phase of the development results in the proposal of dust mitigation measures. The implementation of these will ensure that residual dust impacts during the demolition and construction phase are not significant.
- 7.66. The air quality changes to existing sensitive receptors are predicted to be negligible and not significant. Concentrations of NO₂ and PM₁₀ are likely to be below their respective long and short-term objectives at existing sensitive receptors and at the proposed development site which is therefore considered to be suitable for proposed school with regards to air quality. Concentrations of PM_{2.5} are expected to be below the annual mean target.
- 7.67. The proposed development is not expected to have a significant impact on local air quality when factoring in the proposed vehicular movements and the pattern of these to and from site. Mitigation to local air quality will be provided in terms of EVCP, minibus parking and cycle storage.
- 7.68. There is, therefore, no reason for this application to be refused on the grounds of air quality.

8. Conclusions

- 8.1. The applicants, Witherslack Group, are seeking full planning permission for the change the use of the existing dwelling and part wedding venue to a specialist school at Moor Hall, Romford Road, Averley, RM15 4UU.
- 8.2. Changes of use and the reuse of buildings in the Green Belt do not constitute inappropriate development. The provision of outdoor sport and recreation are also appropriate providing openness is preserved. As such the principle of using Moor Hall as a school and introducing an external MUGA is acceptable in respect of Green Belt policy.
- 8.3. The proposed change of use will protect the significance of Moor Hall (a non-designated heritage asset). The provision of a long-term viable use will enable the upkeep of the property and allow it to retain its local heritage interest.
- 8.4. The proposal will not lead to highway safety or capacity concerns, ensuring safe access and sufficient car parking is provided within the site to serve the proposed specialist education use.
- 8.5. The proposals have been assessed against all relevant national and local planning policy and the NPPF's presumption in favour of sustainable development. For the reasons stated in this statement it is requested that the officer appointed to determine this application should look upon this scheme favourably and recommend approval without delay.
- 8.6. Should there be any queries regarding the application submission then please contact Jack Appleton (ja@broadgrove.co.uk).