

Comment Card Responses:							
Respondents				Do you support the programme?		Do you think the proposals are a good idea?	
Local Resident	Teacher	Pupil	Interested Party	Yes	No	Yes	No
28	20	19	6	71	2	70	3
Other Responses:							
2 (support)							
3 (comments)							
4 (opposition)							

Main Issues Raised		Respondents raising the issue	Amendment to Planning Brief required?
Loss of open space/playing fields			
R1	Opening up the use of the playing fields will benefit the local community and benefit pupils.	1	Comments noted
R2	The playing fields need to be drained as the bottom of the field floods.	1	Outside the site area. A Flood Risk Assessment/Sustainable Drainage Statement will be a requirement of the planning application
R3	Concern regarding how students will access the playing fields and how security will be maintained?		To be agreed with the school and the LPFF.
Transport/parking/access			
R4	The school should be designed to ensure that the site is not dominated by car parking, which is the case in many of the schools in the Borough. The idea of underground parking is supported as it would maximise the areas available for more useful/interactive/learning and leisure purposes.	2	Comments noted. Planning policy requires a restraint based approach to car parking. The overall design of the school will be addressed at the detailed design stage and through the planning application process.
R5	Concern regarding increased traffic and impact on surrounding roads. Measures should be taken to reduce traffic generation. In addition to extra pupil/staff	6	The Council has instructed Transport Consultants to

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	generated traffic, there will also be daily deliveries of food and equipment, refuse collection etc. Increased traffic volumes will adversely affect the quality of the roads, pot holes etc.		investigate the transport issues. The Brief has been amended to include the options assessed by the Transport consultants. The Council will consider transport issues during the design process undertaking a detailed transport assessment and traffic management strategy including a School Travel Plan which will seek to limit the number of people travelling to the site by car. This will also be assessed through the planning application process.
R6	Concerns that the nearby junction is very busy.	3	The Council will consider transport issues during the design process undertaking a detailed transport assessment and traffic management strategy including a School Travel Plan which will seek to limit the number of people travelling to the site by car. This will also be assessed through the planning application process.
R7	Concerns regarding pupil safety when they cross the roads to get to the school.	1	Improved pedestrian crossing facilities will be made on Blackhorse Road, details of which will be subject to detailed design.

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R8	All vehicular access should be confined to Blackhorse Road with only one entrance. An entrance on Edward Road would result in further traffic congestion. Pupils should walk around to the gate on Blackhorse Road.	8	The Council has instructed Transport Consultants to investigate the transport issues. The Brief has been amended to include the options assessed by the Transport consultants. The Council will consider transport issues during the design process undertaking a detailed transport assessment and traffic management strategy including a School Travel Plan, which will seek to limit the number of people travelling to the site by car. This will also be assessed through the planning application process.
R9	Hawarden Road and Edward Road are both narrow and unsuitable for heavier traffic. Preventing right hand turns would push the traffic further down into other local roads.	2	The Council has instructed Transport Consultants to investigate the transport issues. The Brief has been amended to include the options assessed by the Transport consultants. The Council will consider transport issues during the design process undertaking a detailed transport assessment and traffic management strategy including a School Travel Plan, which will seek to limit the number of people travelling to the site by car.

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			This will also be assessed through the planning application process.
R10	Do not support introduction of one-way systems in surrounding roads.	6	The Council has instructed Transport Consultants to investigate the transport issues. The Brief has been amended to include the options assessed by the Transport consultants. The Council will consider transport issues during the design process undertaking a detailed transport assessment and traffic management strategy including a School Travel Plan, which will seek to limit the number of people travelling to the site by car. This will also be assessed through the planning application process.
R11	Concern regarding increased pressure on parking and the potential loss of residents' car parking.	3	There is a CPZ in the surrounding streets, which will protect existing residents parking. The Travel Plan will encourage students and staff to access the site by sustainable modes of transport, such as cycling or walking.
R12	Moving the main entrance of the playing fields to the top of Edward Road, would have an adverse impact on the surrounding residential streets.	1	It is not proposed to move the main entrance to the DESC, although an access from Hawarden Road/link with the school will be investigated, in

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			consultation with the LPFF.
R13	Undercroft car parking should not be considered as it would increase the building's height and would not be good for security.	1	The potential for undercroft car parking will be considered as a way to reduce the visual impact of car parking on site. However, the design, scale and massing etc will be considered at the detailed design stage and through the planning application process.
R14	The school should be a car free development.	1	The Travel Plan will aim to minimise this, but it would not be appropriate to prevent any cars visiting the site.
R15	The lack of Transport Assessment at this stage should not be viewed as an acceptance of the proposed assumptions.	1	The Brief notes (para 5.13) that traffic modelling will be required. This will also be assessed through the planning application process.
R16	Consideration should be given to relocating and/or expanding the bus stop on the western side of Blackhorse Road, south of the station.	1	The Council will consider transport issues during the design process undertaking a detailed transport assessment and traffic management strategy including a School Travel Plan which will seek to limit the number of people travelling to the site by car. This will also be assessed through the planning application process.
R17	Site appears to have great potential, with easy access to public transport.	1	Comments noted
R18	A walk and cycle policy should be introduced – pupils and staff should be encouraged to cycle.	2	A School Travel Plan will be developed to promote sustainable modes of transport.

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R19	Concern that the proposed underpass at the north west corner of the site via the existing tunnel and the proposed cycle path around the site will attract crime, litter, vandalism etc and be unsafe.	6	The possible cycle route has been identified within the DESC and is similarly identified as a potential opportunity in the Brief. If it is incorporated, safety and design issues etc will be considered at the detailed design stage and assessed through the planning application process.
School buildings/design			
R20	The current site is unsuitable for the students/teachers and the school needs more appropriate buildings and facilities if it is to meet requirements for a 21 st century education. The proposals present the opportunity to provide excellent educational/recreational/social facilities for the school and community.	3	Comments noted. The building will be designed to be equipped for modern learning, be energy efficient and meet modern space requirements etc.
R21	It is important to have an impressive architectural design on the site, which is extremely prominent as the western 'gateway' to E17. Would like the building to be a 'cool' shape.	2	The new school will be of a high quality design, which will be considered at the detailed design stage and through the planning application process.
R22	Given that one of the stated reasons for the relocation of the school is the size of the current site, it makes little sense long term to add any residential element to the scheme. Particularly given issues of possible contamination and access concerns.	1	The previous MOS UDP designation has not been saved (from 1 April 2009), but the IPPF vision is for housing on the site. The Brief recognises that there may be an opportunity to incorporate housing on the site, but this would be considered at the detailed design stage in the context of site constraints etc.
R23	Concern that mention of a "landmark" building means a very tall building. No more	8	The design, scale and

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	than 3-storeys should be allowed. Highrise buildings would not be in keeping with the surrounding two-storey Victorian terraced properties.		massing etc will be considered at the detailed design stage and through the planning application process.
R24	A tall building would be visually detrimental to the adjacent Green Belt.	1	Any impact on the Green Belt would be considered at the detailed design stage and through the planning application process.
R25	Support three storeys or more to maximise the development's potential.	2	The design, scale and massing etc will be considered at the detailed design stage and through the planning application process.
R26	Very good location for a new school, facilitating exciting opportunities for the building.	1	Comments noted.
R27	Art classrooms should be on upper floors, over looking the playing field.	1	The layout of the school will be considered through the detailed design stage, inc consultation with the school.
R28	The new school should have wider corridors to avoid congestion. Adequate lockers should be provided. Bigger gym and sports hall wanted	3	The layout of the school will be considered through the detailed design stage, inc consultation with the school.
R29	Innovative, good quality design, including green and environmentally friendly buildings should be used.	1	The buildings will be of a high quality design, will be equipped for modern learning, will be energy efficient and meet modern space requirements etc. This will be considered at the detailed design stage and through the planning application process.
R30	The highest standards of sustainability should be achieved. High rise buildings are intrinsically less sustainable than low rise buildings.	2	The highest possible level of sustainability and energy efficiency will be sought, but

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			this will be dependent on cost implications and scheme feasibility and viability.
Impact on the amenity of local residents/local area			
R31	Development must avoid overlooking of houses on Hawarden Road	1	Impact upon residential amenity will be addressed at the planning application stage.
R32	Litter bins should be provided on local streets to prevent litter.	1	Comment noted. Outside the remit of the Brief.
R33	Increased noise and disturbance in the local area	3	Impact upon residential amenity will be addressed at the planning application stage.
R34	Loss of privacy/overlooking	1	Impact upon residential amenity will be addressed at the planning application stage.
R35	Existing trees/planting should be retained to reduce noise and overlooking etc.	1	Trees will be retained where possible. A full tree planting and landscaping strategy will be part of detailed design process.
R37	The redevelopment of the derelict site will greatly improve the amenity of the area. It is a great opportunity for the school and the wider community.	3	Comments noted.
R38	A significant, positive development for the school, which will benefit the community.	4	Comments noted.
R39	It is extremely important to take the opportunity of maximising access to the arts and cultural facilities, amongst other things. This could become a real educational hub for the wider community.	1	The school is already an extended school and has a strong commitment to increasing community use in the new school building.
R40	The school will enable families to stay in Walthamstow and provide their children with the best opportunities and teachers to fulfil their potential.	1	Comments noted.

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Support comments			
R41	The site needs to be redeveloped	1	Comments noted.
R42	General support for the proposals	24	Comments noted.
R43	Proposals look excellent, fantastic and exciting.	8	Comments noted.
R44	The new school will provide high quality education for young pupils and the community for many years to come.	3	Comments noted.
R45	The relocation of the school is a good idea as it will create better facilities for staff and pupils. The new site is bigger, which will hopefully increase the already high standard of the school.	2	Comments noted.
R46	Improved status for the local area for having such a fantastic school on site.	1	Comments noted.
R47	This land use is far superior to previous tower block proposals. A school development is preferable to high density housing.	4	Comments noted.
Other			
R48	Support the provision of community facilities in the evenings and at weekends, or short one-day courses e.g. computer studies and sports classes. Local artists could also rent rooms for workshops when the school is open anyway e.g. polling day/opening evening/fetes.	1	Comments noted.
R49	The brief should be more specific about possible community uses. Local people need affordable facilities. Cinema evenings in the new school would be great.	2	This is outside remit of the brief, however the school is already an extended school and has a strong commitment to increasing community use in the new school building. The design of the building will seek to facilitate community and extended access.
R50	The proposed site is conveniently located for pupils and staff close to the existing site.	2	Comments noted.
R51	Support the proposed sixth form as it will allow pupils to continue with their studies.	1	Comments noted. The school will not have a sixth form but will offer some post 16 provision.
R52	Too much residential development would risk over-development of the site	1	The Brief recognises that there may be an opportunity

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			to incorporate housing on the site, but this would be considered at the detailed design stage in the context of site constraints etc.
R53	Concern regarding the proposal to include housing on the school site. It would impact on utility services, car parking spaces, recreational spaces etc. Problems with management of a dual use. The site is small for a school without cramming residential development on the site as well.	7	The Brief recognises that there may be an opportunity to incorporate housing on the site, but this would be considered at the detailed design stage in the context of site constraints etc.
R54	A small amount of low level (2 storey) housing would be acceptable on the site.	1	The Brief recognises that there may be an opportunity to incorporate housing on the site, but this would be considered at the detailed design stage in the context of site constraints etc.
R55	The retention of the former Warner Site Office should be considered.	1	In order to maximise the developable area and to meet the needs of the school, it is unlikely that the Warner Site Office could be retained. The original building is not seen to be of any special architectural character and is not listed. Retention could not be justified.
R56	Contamination issues need to be resolved	2	The Brief recognises the need to provide a Contaminated Land Study as part of the planning application.
R57	The process has gone on for too long, the planning process started in 2003.	1	Comment noted.
R58	The resources of the school should be up to date/good and the toilets must be kept clean at all times.	1	Comments noted. The school will be responsible for its

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			management.
R59	It would be a waste of money to demolish the sports building on Coppermill Road and erect another one.	1	Comments noted. Any relocation of the DESC sports hall is outside the remit of the Brief.
R60	Cumulative impact of all the new developments will place increased pressure on schools, dentists, doctors and transport etc	1	This will be considered through the planning application process.
R61	The fact that an EIA might not be required seems questionable, given the likely significant effects.	1	The Brief notes that it will be necessary for the Council to provide a Screening Opinion to determine whether an EIA would be required.
R62	Include provision for growing food as it is important for education.	1	Outside the remit of Brief but will be considered as part of the finalisation of the school brief and during the design stage.
R63	The site will be prone to flooding and drainage issues and these issues should be considered at an early stage.	1	Flood risk will be considered in detail during the detailed design stage and through the planning application process.
R64	Need to address the proximity of the school to takeaways.	1	The proximity to takeaways etc will remain similar to the existing situation. The Council has recently adopted Interim Planning Policy to control the number of takeaways locating near schools.
R65	The school should remain at 600 pupils. The statistics are not foolproof and people move into the area, but people also move out of secondary school age.		Pupil place planning data across the Borough forecasts that an additional 14 Forms of Entry (FE) are required by 2014/15. The expansion of Willowfield School by 2FE to 6FE is a central element to the Borough wide expansion

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			strategy and meets the objective to expand or re-align 4FE schools, where possible, to enhance the curriculum offer.
R66	Consideration should be given to other sites, such as the land on the other side of Forest road.	1	A formal sequential test identified potential suitable sites. The preferred site was selected by balancing the key issues of cost, timing deliverability and planning policy.

Comments submitted by students at the school: 60 (support comments)

Comments include:

1. Proud to go to Willowfield School, there are excellent teachers at the school.
2. It is one of the best schools in the Borough.
3. Corridors and toilets need expanding.
4. Showers are needed.
5. An improved environment will provide a positive atmosphere for learning.
6. The drains are often blocked.
7. Improved computers and ICT needed.
8. The reception area and car park needs to be improved.
9. The playground is too small, a bigger one is needed and there is nowhere to go when it rains
10. More green space and trees are needed.
11. Sport facilities need to be improved.
12. Places to store belongings should be provided e.g. lockers.
13. Lifts are needed for disabled students who cannot walk up the stairs.
14. The canteen is small and teachers are served first.
15. Classrooms need to be improved, particularly the science room.
16. People can climb over the fence into the school.
17. A new school will benefit not only pupils and staff, but the local community.

Summary of response from Willowfield School's Governing Body		Amendment to Planning Brief required?
1	Redevelopment welcomed, very excited about the location of the proposed site, which will create improved learning and working environment for students, teachers and staff.	Comments noted.
2	The proximity of the playing fields will facilitate an improvement to PE and sports. The setting,	Comments noted.

	with open space and views towards the marshes will crease an enviable setting.	
3	Concern regarding proposals to build housing on the site as it would complicate the process and result in increased opposition from local residents. It would also reduce the available area for the school and there are potential management issues associated with housing on the site and potential conflict.	The Brief recognises that there may be an opportunity to incorporate housing on the site, but this would be considered at the detailed design stage in the context of site constraints etc.
4	Concern regarding the pedestrian/cycle route around the site, as the creation of an alleyway around the site would undermine the site's proximity to, and access to, the adjacent open space. Also concern regarding safety issues, as it will create a route that will feel and be unsafe for users, and may attract undesirable people wanting access to the students.	The possible cycle route has been identified as a potential opportunity in the Brief and in the IPPF. If it is incorporated, safety and design issues etc will be considered at the detailed design stage and assessed through the planning application process.

Summary of response from Waltham Forest Civic Society		Amendment to Planning Brief required?
S1	How will the school be paid for? It is supposed to be part-PFI sponsored, but so far no-one has offered any money.	Site acquisition to be funded by the authority and the new build through BSF funding as a PFI project.
S2	There are plans for existing students to stay on at sixth form to study humanities, but will students wanting to study other subjects (e.g. maths, science etc) have to go to other Sixth Forms/Colleges? Will priority for the sixth form places be given to pupils already studying at Willowfield?	The school will not have a sixth form but will offer some post 16 provision.
S3	The playing fields are frequently flooded and if used by the school would have to be far better maintained than they are at present.	Flood risk will be considered in detail during the detailed design stage and through the planning application process.
S4	Many people have been in favour of the school's relocation as it would remove any threat of high-rise housing or a new incinerator behind Hawarden Road being put forward.	Comments noted.
S5	There is a plan to retain the cobbled lane leading into the site from Hawarden Road. The Civic Society should ask for this to be retained in-situ as a barrier to encroachment of buildings behind Hawarden Road back gardens.	Reuse of these materials within the site will be considered during options appraisal.
S6	The vehicle entrance point on Blackhorse Road is of concern. This would be the school's main entrance. Widening of Blackhorse Road is proposed, which would be a good thing, but how would that will be done given the railway bridge?	The Council will consider transport issues during the design process undertaking a detailed transport assessment and traffic management strategy including a

		School Travel Plan which will seek to limit the number of people travelling to the site by car. This will also be assessed through the planning application process.
S7	It is planned for staff (and delivery) vehicles to use the former access into the Warner Estate site office and tree nursery at the junction of Hawarden Road and Edward Road, which is virtually a hairpin bend. Suggested that further consultation should be carried out into this proposal, plus the whole road layout.	The Council has instructed Transport Consultants to investigate the transport issues. The Brief has been amended to include the options assessed by the Transport consultants. The Council will consider transport issues during the design process undertaking a detailed transport assessment and traffic management strategy including a School Travel Plan, which will seek to limit the number of people travelling to the site by car. This will also be assessed through the planning application process.
S8	Traffic management is already a major problem and Standard Junction, is undergoing yet another redesign to the entire layout.	The wider plans for the Blackhorse Road area are being considered as part of the wider regeneration strategy for the area and are outside scope of this planning brief although will be fully considered during development of these proposals.
S9	Cycling in particular does not seem to have been considered, despite proposals for some sort of path to be put in nearby as an 'Olympic Access Route'.	The potential to incorporate a cycle/pedestrian route has been incorporated within the opportunities plan, subject to appropriate design and safety considerations.
S10	Concerned about the safety of pupils crossing the road. This is particularly an issue with pupils buying takeaways. Although this is not encouraged, there are many takeaway food outlets and confectioners on Blackhorse Road/Forest Road which the children use. If the school moves this would involve crossing two busy main roads, presenting safety issues.	Improved pedestrian crossing facilities will be made on Blackhorse Road, details of which will be subject to detailed design.

		The school is relocating from nearby and the issue of road safety will remain similar to the existing situation. At present large numbers of pupils cross the roads from the existing school site to access the DESC. The proximity to takeaways etc will remain similar to the existing situation. The Council has recently adopted Interim Planning Policy to control the number of takeaways locating near schools.
S11	In broad favour of the proposal and support the move in principle. However, more details are needed when the detailed plans have been drawn up, particularly on the proposed changes to the road layout.	The Council will consider transport issues during the design process undertaking a detailed transport assessment and traffic management strategy including a School Travel Plan which will seek to limit the number of people travelling to the site by car. This will also be assessed through the planning application process.
Summary of response from Blackhorse Action Group Residents Association (BAG)		Amendment to Planning Brief required?
S12	Opposed to development of three storeys or more. Noted that it was mentioned if housing does go ahead on the site, it might result in higher buildings.	The design, scale and massing etc will be considered at the detailed design stage and through the planning application process.
S13	Complete opposition to the incorporation of housing with the proposed scheme. Delighted by Cllr Robbins commitment to convey this to Cabinet and his reassurance that it was a " <i>very unlikely scenario</i> ".	The previous MOS UDP designation has not been saved (from 1 April 2009), but the IPPF vision is for housing on the site. The Brief recognises that there may be an opportunity to incorporate housing on the site, but this would be considered at the detailed design stage in the context of site constraints etc.

S14	<p>The vast majority of students are residents in the area and the school has a close catchment area. It is understood that this will remain the case with the proposed expanded school.</p>	<p>55% of pupils attending Willowfield school live within ½ mile of the school and 88% live within 1 mile of the school. It is expected that new pupils attending the relocated school would mainly live within 1 mile of the school as the intake of the new school will be higher (900 per year group). The admissions criteria for the new school will be similar to the existing situation.</p> <ol style="list-style-type: none"> 1. Pupils in Public Care (Looked after Children) and children recorded in the Child Protection Register or who are 'at risk' as advised by Waltham Forest's Child Protection Officer. 2. Children who are the subject of an Adoptive Order or have been adopted, as described in the Children Act 2002. 3. Children or their principal carers with strong medical reasons acceptable to the authority requiring them to be admitted to a particular school. Children who have a brother or sister on roll at the school at the time of admission. 4. Distance of the school from child's permanent place of residence.
S15	<p>The Brief allows for the possibility of future expansion, but the reasons for such an expansion and the nature of it, possibly encroaching onto the playing fields, has not been given. Local residents want a clear understanding of what will happen and what would trigger any expansion.</p>	<p>Expansion onto the playing fields is not part of the brief.</p>

S16	What plans are in place to protect students from high traffic pollution levels, which is linked to asthma? The location of a school between two major road arteries cannot be helpful in health terms. These issues should be considered at an early stage.	Appropriate mitigation measures will be considered at the detailed design stage and through the planning application process.
S17	Noted that most students would walk or cycle, but concern that more students would be driven to school than expected. Concern regarding safety issues for cyclists and pedestrians at the junction with Blackhorse Road, Blackhorse Lane and Forest Road, particularly near the tube station.	A School Travel Plan will be required as part of the planning application which will seek to promote sustainable modes of transport.
S18	Does the Council have plans to redevelop the junction to make it safer for pedestrians and cyclists? Possibility of providing alternative cycle/pedestrian routes.	The potential to incorporate a cycle/pedestrian route has been incorporated within the opportunities plan, subject to appropriate design and safety considerations. The wider plans for the Blackhorse Road area are being considered as part of the wider regeneration strategy for the area and are outside scope of this planning brief although will be fully considered during development of these proposals.
S19	What proportion of the funding will be covered by BSF and what, if anything will come from other development fund sources?	The build of the new school will be funded from BSF; opportunities for additional resources will be explored.
S20	Request to confirm what infrastructure improvements are needed, as part of the wider vision for the area.	Falls outside the remit of the planning brief, and relates to wider strategic and regeneration issues. Further details are available within the IPPF and the S106 strategy.
S21	Concern regarding the creation of a one-way road system incorporating Hawarden Road and Lloyd Road. Concern regarding reduction in car parking spaces for residents and increased traffic speeds. Concern also about the route delivery trucks would use. Preference that any access solution was limited to Blackhorse Road with no entrances or exits on Hawarden Road.	The Council has instructed Transport Consultants to investigate the transport issues. The Brief has been amended to include the options assessed by the Transport consultants. The Council will consider transport issues during the design process

		undertaking a detailed transport assessment and traffic management strategy including a School Travel Plan, which will seek to limit the number of people travelling to the site by car. This will also be assessed through the planning application process.
S22	Issues regarding community access to the school's facilities. It is understood that the school is obliged to provide 500-600 hours a year access to community groups, with school business, governors meetings etc using some of that time. Access to the remaining hours would be determined by governors and any access beyond those hours would have to be bought from the PFI company. Residents noted that this was not fair, either to them or the school.	Comments noted.
S23	Request that the development incorporates community amenities that are not primarily related to the school's needs but also cater to the needs of other residents in the area.	Dedicated space for community use is not funded under BSF although dual use spaces will be considered. The school is already an extended school and has a strong commitment to increasing community use in the new school building.
S24	Demise of housing scheme means there will be no s106 money. BAG reminds Councillors that the proposed development on BHL2 and commitments to development in the area and requested that additional investment should be provided if necessary. BAG would like the Council to conduct a feasibility study into what may be possible in terms of developing a bold funding strategy.	Outside the remit of the brief; comments noted.
S25	The development should meet the highest possible environmental standards and should meet more than the "very good" rating specified in the Brief. The proposed development would, through its high standards, allow it to offset carbon usage by other schools where it was unable to achieve such significant carbon reductions.	The highest possible level of sustainability and energy efficiency will be sought, but this will be dependent on cost implications and scheme feasibility and viability.
Summary of response from the London Playing Field Foundation (LPPF)		Amendment to Planning Brief required?
S26	No objection in principle to the relocation of Willowfield School or the expansion of the school.	Comments noted
S27	Disappointed that the Brief excludes the prospect of a significant partnership between the Council and the Foundation to make the best use of the site and the playing field. The Planning Brief is too constrained in its scope and does not explore the possibility of integrating the school with the sports centre to create a "community hub".	The brief will be amended to recognise the potential to further develop the partnership between LBWF and the LPPF(subject to

		appropriate negotiations with the LPFF).
S28	Throughout the Brief, the “Douglas Eyre Sports Centre” (DESC) is referred to as either “Douglas Eyre Playing Field” or “Douglas Eyre Playing Fields”.	Reference to the playing field will be amended to refer to the DESC throughout the Brief.
S29	The Document is ambiguous. The status and title of the document should be on the front cover. There is no such thing as a “Planning Brief” under the new LDF guidelines. It is questionable whether this document should be called a planning brief. Boroughs should not produce planning guidance other than SPD where it is intended to be used in decision making or the coordination of development. As para 1.7 states that it is the intention of the brief to assist the future development of the site, the document should clearly be titled Supplementary Planning Document.	The Brief is not intended to form part of the LDF, but is informal planning guidance, as confirmed in paragraph 1.7, and therefore it is acceptable to call the document a "Planning Brief". The Brief sets out principles, which should be considered in the preparation of a planning application, intended to guide development and although it a material planning consideration in the determination of any planning application, it is informal guidance, which is not intended to be an SPD.
S30	The Brief makes little reference to the IPPF.	The relevant elements of the IPPF are referred to within the Brief.
S31	The Brief concerns itself solely with the siting of the school on the former industrial site, identified as a MOS in the UDP. The IPPF identified that the preferred site for the new school on the northern part of the DESC. Surprised that the Brief does not include consideration of siting elements of the school on the previously identified part of the DESC (although it is acknowledged that there are flood risk issues), or the relocation of the main pavilion and ATP to the northern part of the DESC to facilitate use by the school to form part of the “community hub”. This is referred to as a constraint (para 3.2.6), but it is more of an opportunity as the LPFF has indicated a willingness to negotiate access to the site, for instance as a sports facility and habitat area.	The Brief is primarily concerned with the siting of the school on the site which is identified as a Major Opportunities Site in the Council's UDP (although since the Brief was drafted, the designation has not been saved and no longer applies) and IPPF. The Brief does not consider the siting of the school building on the northern part of the DESC because it is no longer considered to be a feasible option. Sequential assessment identified better alternatives, including the site now proposed. As such, locating the school on

		DESC could not be justified in terms of national and local Green Belt policy, and flood risk concerns etc. Likewise, the Brief does not consider the relocation of the main pavilion and ATP to the northern part of the Playing Field, as it is outside the remit of the brief.
S32	The site description does not mention that it previously included the industrial buildings of the Hawarden Estate, located off Hawarden Road.	Amend Section 2.0 to include reference to the Hawarden Road former housing maintenance yard.
S33	The constraint plan (fig 3.1) does not identify the boundary of the school with the DESC as a sensitive boundary. It is designated as MOL, Green Belt and Playing Field, all of which require sensitive treatment. The constraints plan also ignores the IPPF document and the principles of Blackhorse Lane.	Amend Figure 3.1 accordingly, to include the DESC as sensitive boundary to the constraints plan (figure 3.1)
S34	The Council is wholly reliant on land outside its ownership, particularly with regard the creation of a habitat area and full access to the playing fields, which has not yet been assessed in terms of ownership, access and LPFF's management and utilisation of the fields.	This has been included as a potential link, but issues of land ownership, access etc will be subject to negotiation.
S35	Section 4.0 is light in terms of its detail and information. Flood risk is a constraint. The Mayor's Plan and PTAL rating should be used to highlight the site's accessibility.	Section 4.0 of the Brief provides a summary of the planning policy context and is not intended to be an exhaustive list, but a starting point during the detailed design stage. A fuller planning policy summary is provided in Appendix 1. A Flood Risk Assessment will form part of the planning application submission. The London Plan is referred to throughout and the site's PTAL rating is noted in Appendix 1.
S36	The LPFF does not consider the pedestrian/cycle route would be beneficial as it would present a security risk and a potential source of antisocial behaviour. The LPFF will resist the creation of this route as it has always maintained its objection to unregulated access to the fields. Playing fields must be carefully managed and maintained to maximise their utilisation for the benefit of the community.	Comments noted. The potential to incorporate a cycle/pedestrian route has been identified within the IPPF and within the planning brief, subject to appropriate design and safety considerations, which would be considered at the

		detailed design stage and assessed through the planning application process. The wider plans for the Blackhorse Road area are being considered as part of the wider regeneration strategy for the area and are outside scope of this planning brief although will be fully considered during development of these proposals.
S37	The Brief does not demonstrate how a mixed use development might work for the site.	Any mix of uses on the site would be considered in more detail at the detailed design stage in the context of site constraints etc.
S37	The reference in para 5.9 to increasing access by other users of the DESC are inappropriate without agreement with the LPFF and without a full assessment of the impact of the proposals on the use and management of the fields by the LPFF. Likewise, the use of LPFF land for the cycle/pedestrian route, habitat area etc will be resisted.	Paragraph 5.9 recognises access to the playing fields etc as an aspiration. The LPFF's response raises concern that the Brief does not consider links with the LPFF and the playing fields, but criticises para 5.9 of the Brief, which refers to improving access to the playing fields. Issues of land ownership, access etc will be subject to negotiation.
S38	The Brief seems to be making a Screening Opinion letter out of the Brief.	Section 6.0 (Next Steps) provides a summary of the Regulations and does not form a Screening Opinion.
Summary of response from Waltham Forest Cycling Campaign (WFCC)		Amendment to Planning Brief required?
S39	Welcome the move to provide excellent schooling in this area and at the same time improve a very unattractive corner of the Borough.	Comments noted.
S40	Given the high density of housing in the area, as well as the narrow street network, transport implications are very important.	Comments noted and are addressed in the Brief. Requirement for a Transport Assessment and Travel Plan noted in Section 6.0 of the Brief.
S41	Although the plans are at an early stage, already turning bans and one way streets are proposed,	The measures outlined in the Brief

	much to the disadvantage of people who cycle.	are possible options and will be subject to full assessment and traffic modelling. This will also be assessed through the planning application process.
S42	Disagree strongly with any turning bans for cyclists (cycles should be exempt) and with one way streets which lead to higher vehicle speeds, inconvenient detours for cyclists and longer journeys, increasing traffic for local residents. At the very least cyclists should not be affected by one way workings, which is best achieved by not using one ways but instead point-no-entry designs. This has been done close by in Glenthorne Road very successfully.	The measures outlined in the Brief are possible options and will be subject to full assessment and traffic modelling. This will also be assessed through the planning application process.
S43	Cycling should not be treated as an afterthought for this important development. This could be a beacon for sustainable development that takes sustainable transport seriously by making the site itself and the surrounding streets pedestrian and cycle friendly.	The potential to incorporate a cycle/pedestrian route has been incorporated within the opportunities plan, subject to appropriate design and safety considerations.
Summary of response from English Heritage/The Greater London Archaeology Advisory Service (GLAAS)		Amendment to Planning Brief required?
S44	The site lies largely within an Archaeological Priority Area as specified, where evidence for prehistoric occupation can be preserved within and below alluvial deposits associated with the floodplain of the River Lea.	Comments noted.
S45	The adjacent gravel terraces, which underlie the eastern part of the site, have also been shown to be favourable locations for prehistoric settlement – of particular note is the Bronze Age settlement recently excavated to the south of the site on the Oliver Close Estate. Similarly important remains may occur on this site.	It is noted that an Archaeology Statement will be required to accompany the planning application. Access to the site for archaeological evaluation will be provided during groundworks phase.
S46	GLAAS has advised the Council on previous applications for the redevelopment of this site that a programme of archaeological evaluation, and any subsequent mitigation strategy, should be secured by attaching a standard PPG16 style condition to any consents the Borough grants.	Comments noted. It is noted that an Archaeology Statement will be required to accompany the planning application. Access to the site for archaeological evaluation will be provided during groundworks phase.
S47	GLAAS has previously written to the Council recommending approval of a written scheme of investigation for an archaeological evaluation of the site, prepared by Pre-Construct Archaeology. However, the archaeological work has not yet been undertaken. It is likely that GLAAS would provide the same advice that a programme of archaeological work should be	The earlier submission related to an earlier proposal for housing on the site. It is noted that an Archaeology Statement will be

	secured by a condition in respect of this application.	required to accompany the planning application. Access to the site for archaeological evaluation will be provided during groundworks phase.
Summary of response from Natural England		Amendment to Planning Brief required?
S48	Welcome the inclusion in the proposals of a designated 'habitat' area, providing the opportunity to be used as an outdoor classroom resource.	Comment noted.
S49	Welcome the proposals to incorporate green roofs into the development.	Comment noted.
S50	In line with PPS9: Biodiversity Conservation and London Plan policy 3D.14, recommend that further opportunities are taken to enhance the natural environment within the development, such as additional planting outside the habitat area, the incorporation of bird boxes etc.	Amend section 5.0 of the Brief to reflect these comments.
S51	Recommend a number of resources available to assist when considering the implications of development proposals in the natural environment in Greater London. Including: Design for Biodiversity; Biodiversity by Design, Improving Londoner's Access to Nature, Right Trees for a Changing Climate, and Adapting to Climate Change: A Checklist for Development.	These documents should be referred to during detailed design.
Summary of response from Network Rail		Amendment to Planning Brief required?
S52	The proposals depart from the UDP designation and therefore there is still uncertainty regarding the deliverability of the scheme. It would not be appropriate nor good planning policy to adopt a document which departs significantly from the existing UDP designation.	The policy designation (MOS), from 1 April was not saved and no longer applies to the site.
S53	The Brief should not be adopted in a way that would exclude the potential for planning permission to be granted for a scheme which is in accordance with the UDP.	The Brief refers to the redevelopment of the site for a school, but does not preclude any future alternative uses on the site.
S54	It would be beneficial to ensure that the range of uses for the land are kept as open as possible to encourage redevelopment and not restrict the site to one specific activity, when the UDP has previously identified that a range of activities are acceptable in this location.	The Brief refers to the redevelopment of the site for a school, but does not preclude any future alternative uses on the site.
S55	Any new fence should be at least 2.4m high and robust to prevent trespass and/or vandalism. In addition, an area of clearance from the network rail fence to the face of the building will be required, along with lighting next to the railway, drainage and access for maintenance.	Adequate maintenance areas will be provided, and are shown on the opportunities plan (fig 5.1).
Summary of response from Transport for London		Amendment to Planning Brief required?
S56	The site is immediately south of the railway line and is bounded by Blackhorse Road to the east, Hawarden Road to the south and playing fields to the west. Blackhorse Road rail station is served by the Victoria Line and London Overground services from Barking to Gospel Oak. Train frequencies from Barking to Gospel Oak will be increased to 4 per hour throughout the day from September 2009 and station/rolling stock upgrades are planned as part of the London	No amendment required to the Brief – already included within the Brief.

	Overground improvements. Frequent bus services include route 123 along Forest Road and routes 158 and 230 along Blackhorse Road connecting the site to Chingford Mount, Stratford, Wood Green and Ilford. Blackhorse Road (A1006) is part of the Strategic Road Network (SRN).	
S57	Total pupil and staff numbers are needed to establish likely trip generation and demand for bus travel to the proposed new school. It is understood that the site would be within the existing catchment area for Willowfield School and that the majority of pupils would continue to travel on foot or cycle, but this assumption should be tested by conducting surveys and using these to establish trip generation, distribution and modal split. Any pupils that travel by bus will be expected to use the existing mainstream bus network and TfL would not be looking to provide a specific school bus to the site. It is assumed that there will be no significant increase in pupil/staff numbers or the overall demand for bus travel as a result of the relocation. However, if there is an overall increase, a contribution towards additional journeys on existing bus routes may be required, equating to at least £70,000 per annum for a minimum three year period i.e. £210,000 at January 2009 costs.	This would need to be addressed during the planning application process. Any contribution towards additional journeys may be challenged given the close proximity of the proposed new site to the existing school and the fact that the school expansion is a response to increased demand.
S58	Early contact should be made with London Underground Infrastructure Protection and Network Rail to ensure that plans for the site take account of any constraints arising from the surface and underground rail infrastructure. This goes beyond the need for noise attenuation identified in the list of constraints to consider issues of design, access, and maintenance requirements.	Network Rail, London Underground and other statutory consultees have been consulted and comments received in respect of the Brief. Further discussions will occur at the detailed design stage.
S59	The cycle/pedestrian route would provide improved connectivity and permeability, but there is a need for early liaison with the relevant authorities including Network Rail and London Underground to establish feasibility, costs and any issues relating to ownership and maintenance. Issues of personal security associated with the underpass would also need to be considered.	The potential to incorporate a cycle/pedestrian route has been incorporated within the opportunities plan, subject to appropriate design and safety considerations.
S60	TfL would endorse the need for modelling, given the proximity of the site to the SRN. This will be important in understanding the impact of development of the site and associated changes. Subject to the modelling, TfL is likely to support restrictions on vehicular access from Blackhorse Road and removal of parking.	A Transport Assessment will be required to accompany the planning application and will be assessed through the planning application process.
S61	Attention should be paid to ensuring safe, attractive walking routes from the proposed site entrances to existing bus services on Blackhorse Road and Forest Road and the rail station. As part of the proposed changes, consideration should be given to footway widening, resurfacing and general improvement of routes to the station and bus stops. The provision of fully accessible crossing facilities at appropriate locations would be expected and would need to be considered as part of the modelling.	Amend brief to incorporate these comments.

S62	Cycle parking provision should be in line with TfL and the Borough's cycle parking guidelines which specify a minimum of 1 space per 10 staff/students. Cycle parking provision above minimum levels should be considered to allow for future growth. The site should also be integrated into surrounding cycle networks through provision of appropriate links.	Already included in Appendix 2, but updated appendix to include all of these comments.
S63	Car parking for visitors and staff should be provided in accordance with guidance and best practice and should be set at a level that minimises impacts on the transport network. Concerns about on-street parking should not be used to justify a high level of on site parking and the introduction or extension of parking restrictions on surrounding streets should be considered. The incidence of drop off and any problems arising from the planned provision will need to be closely monitored through the Travel Plan.	This would be assessed through the planning process.
S64	A comprehensive Transport Assessment prepared in accordance with TfL Best Practice guidance should accompany any applications. Calculations of trip generation should follow advice in the TfL Best Practice guidance. A detailed Travel Plan should also be submitted as part of the application. This will need to be informed by data on travel patterns by staff, pupils and visitors and how they will be catered for in the relocation. A Construction Logistics Plan and Delivery & Servicing Plan should also be prepared, accompanied by Autotrack runs for refuse and servicing vehicles. TfL strongly recommends that the applicants take advantage of TfL's pre-application advice so that transport issues can be resolved at an early stage in the planning process, particularly in light of the need for any applications to be referred to the Mayor.	The requirement to produce a Transport Statement/Assessment and Travel Plan is included within the Brief. This would need to be addressed during the planning application process.
Summary of response from the Environment Agency (EA)		Amendment to Planning Brief required?
S65	This site appears to be located in Flood Zone 1 according to EA flood maps. However, Flood Zones 2 and 3 do border the site. It is recommended that the EA is contacted as plans progress to obtain the most up to date flood levels and undertake a topographic survey of the site to ascertain whether the site will be affected by a flood event. A sequential approach should then be carried out to direct vulnerable uses (e.g. school building) out of the flood risk areas. The flood levels and topographic survey are likely to be sufficient enough to be the Flood Risk Assessment to assess fluvial flooding for the site.	The Brief recognises the need to provide a Flood Risk/Sustainable Drainage Statement as part of the planning application.
S66	In Flood Zone 1, where the risk of flooding from rivers or the sea is classified as low, a Flood Risk Assessment is still required but it should be focused on the management of surface water run-off. Development that increases the amount of impermeable surfaces can result in an increase in surface water run-off, which in turn can result in increased flood risk both on site and elsewhere within the catchment. This is particularly important for larger scale sites, which have the potential to generate large volumes of surface water run-off. The site may also still be at risk from other sources of flooding (e.g. groundwater and overland runoff), which are not considered in the mapping of Flood Zones. Further information is provided in Annex C of PPS25.	The Brief recognises the need to provide a Flood Risk/Sustainable Drainage Statement as part of the planning application. The Brief recognises, Appendix 2, the need to incorporated SUDS within the scheme.

	Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SUDS). SUDS are an approach to managing surface water run-off which seeks to mimic natural drainage systems and retain water on or near the site as opposed to traditional drainage approaches which involve piping water off site as quickly as possible. SUDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, green roofs, ponds and wetlands. SUDS offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge, and improving water quality and amenity.	This will be considered at the detailed design stage and through the planning application process.
S67	A Risk Assessment will need to be carried out to assess whether the site is contaminated and the potential risk of pollution to groundwater. This Risk Assessment will need to accompany a planning application. The Risk Assessment will need to look at the previous uses of the site, the process that occurred on the site, the geology and potential water receptors and pathways.	The Brief recognises the need to provide a Contaminated Land Study as part of the planning application.
Summary of response from the Lee Valley Regional Park Authority		Amendment to Planning Brief required?
S68	The site sits adjacent to the Regional Park, sharing its eastern boundary at the northern end of Douglas Eyre Playing Fields. The 'Points of Interest' shown on Figure 2.1 include sites located within the Park: the playing fields and the tennis court. This should be referred to in the description of the site and surrounding area. The playing fields and reservoirs mentioned in section 2 are all part of the Regional Park. These are areas that the Authority, together with key partners such as Thames Water and the London Borough of Waltham Forest are seeking to improve and open up for recreation, leisure and sporting activity.	Section 2.0 of the brief to be updated to reflect these comments.
S69	The school development should form an integral part of the wider regeneration and enhancement of the Blackhorse Lane area. Reference to the Regional Park and UDP policy ENV13 is welcomed in Section 4 Planning Policy Context. The planning brief should ensure that development of the school enhances environmental quality, and does not adversely affect the amenity and visitor enjoyment of the Park or the implementation of recreation, nature conservation and leisure proposals.	Comments noted
S70	The Authority's Park Plan 2000 contains proposals for pedestrian and cycle access that should also be included in section 4.0; <ul style="list-style-type: none"> o Proposal PW6 to establish the Lee Valley Pathway Corridor a pedestrian and cycle route through this area of the Park. This is a Park wide proposal for a combined pedestrian and cycle route running north south throughout the length of the Park, on its eastern side. A route through from Forest Road to Coppermills Lane is proposed, potentially in conjunction with the ecological and environmental enhancement of the Flood Relief 	Add into Section 4.0 and Appendix 1 of the Brief. It should be noted that it is not desirable to have unregulated access to the playing fields.

	<p>Channel, opening up this route onto the adjoining playing fields if possible.</p> <ul style="list-style-type: none"> o Proposals for the improvement of cross valley pedestrian and cycle links in this area in order to provide access into and across the Regional Park and establish links with the adjoining communities (Proposal 6.5c). 	
S71	The potential cycle/pedestrian around the west of the site may offer a useful additional route that links through to Coppermills Lane, providing the cycle/pedestrian route is directed along quieter residential roads. This will also improve the connectivity of the school site with the adjoining residential areas and encourage pupils to walk and cycle to school. Critical to these access improvements is the link under the railway through to Forest Road. This should be highlighted in section 5 as part of the access requirements.	The potential to incorporate a cycle/pedestrian route has been incorporated within the opportunities plan, subject to appropriate design and safety considerations.
S72	Development guidelines/principles to use the school building out of hours as a 'community hub' (paragraph 5.2) should also consider how this concept might help to enhance the use of and improve access to open spaces, sports facilities and sites of interest within the wider area of the Regional Park and Waltham Forest.	This would be subject to negotiation with landowners.
S73	The principle to retain existing trees along the site's boundaries where feasible is welcomed; enhancement of these boundaries and in particular the type and height of fencing (para 5.24) should address the relationship between the Park, the openness of the playing fields and the new development in order to improve the quality of environment. The incorporation of a practical habitat area as part of the SUDs for the site is welcomed although the Authority would wish to see further detail as to how this might be linked into the 'adjacent green corridor' (para 5.31).	Comments noted.