



THE LONDON BOROUGH
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DATE: 2 July 2015

To: Members of the
DEVELOPMENT CONTROL COMMITTEE

Councillor Peter Dean (Chairman)
Councillor Nicky Dykes (Vice-Chairman)
Councillors Vanessa Allen, Graham Arthur, Douglas Auld, Kathy Bance MBE,
Eric Bosshard, Katy Boughey, Lydia Buttinger, Simon Fawthrop, Ellie Harmer,
Charles Joel, David Livett, Russell Mellor, Alexa Michael, Richard Scoates and
Michael Turner

A meeting of the Development Control Committee will be held at Bromley Civic
Centre on **MONDAY 13 JULY 2015 AT 7.30 PM**

MARK BOWEN
Director of Corporate Services

Public speaking on planning application reports is a feature at meetings of the Development Control Committee and Plans Sub-Committees. It is also possible for the public to speak on Contravention Reports and Tree Preservation Orders at Plans Sub-Committees. Members of the public wishing to speak will need to have already written to the Council expressing their view on the particular matter and have indicated their wish to do so to Democratic Services **by no later than 10.00 a.m.** on the working day before the date of the meeting.

The inclusion of public contributions, and their conduct, will be at the discretion of the Chairman. Such contributions will normally be limited to two speakers per proposal, one for and one against, each with three minutes to put their point across.

For further details, please telephone **020 8313 4745**.

A G E N D A

- 1 **APOLOGIES FOR ABSENCE AND NOTIFICATION OF SUBSTITUTE MEMBERS**
- 2 **DECLARATIONS OF INTEREST**
- 3 **CONFIRMATION OF THE MINUTES OF THE MEETING HELD ON 9 JUNE 2015**
(Pages 1 - 22)

4 QUESTIONS BY MEMBERS OF THE PUBLIC ATTENDING THE MEETING

In accordance with the Council’s Constitution, questions to this Committee must be received in writing 4 working days before the date of the meeting. Therefore please ensure questions are received by the Democratic Services Team by 5pm on Tuesday 7 July 2015.

5 PLANNING REPORTS

Report Nos.	Application Number and Address	Page Nos.	Ward
5.1	(15/00909/FULL1) - Harris Academy Beckenham, Manor Way, Beckenham BR3 3SJ	23 - 60	Kelsey and Eden Park
5.2	(15/00908/FULL1) - Harris Academy Beckenham, Manor Way, Beckenham BR3 3SJ	61 - 88	Kelsey and Eden Park

6 LOCAL LIST OF VALIDATION REQUIREMENTS FOR PLANNING APPLICATIONS
(Pages 89 - 124)

7 PETITION - BULL LANE ALLOTMENTS (Pages 125 - 128)

8 BROMLEY'S LOCAL PLAN - POTENTIAL SITE ALLOCATIONS DRAFT POLICY AND DESIGNATIONS ALTERATIONS' FOR CONSULTATION (Pages 129 - 146)

(A copy of the ‘Local Plan – Potential Sites, Draft Policy and Designation Alterations’ referred to as Appendix 1, will be made available in the Members’ Room and published on the Council’s website shortly. A paper copy will also be available at the meeting.)

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DEVELOPMENT CONTROL COMMITTEE

Minutes of the meeting held at 7.30 pm on 9 June 2015

Present:

Councillor Nicky Dykes (Vice-Chairman)
Councillors Vanessa Allen, Graham Arthur, Douglas Auld,
Teresa Ball, Kathy Bance MBE, Nicholas Bennett J.P.,
Katy Boughey, Simon Fawthrop, Ellie Harmer, Russell Mellor,
Alexa Michael, Sarah Phillips, Richard Scoates, Colin Smith and
Michael Turner

Also Present:

Councillors Robert Evans, Will Harmer, William Huntington-Thresher,
Tony Owen and Pauline Tunncliffe

1 APOLOGIES FOR ABSENCE AND NOTIFICATION OF SUBSTITUTE MEMBERS

Apologies for absence were received from Councillors Eric Bosshard, Lydia Buttinger, Peter Dean and Charles Joel; Councillors Nicholas Bennett JP, Sarah Phillips, Colin Smith and Teresa Ball attended as their substitutes respectively.

An apology for absence was received from Councillor David Livett and an apology for lateness was received from Councillor Colin Smith.

In light of Councillor Dean's absence, Vice-Chairman Councillor Nicky Dykes acted as Chairman for the meeting.

2 DECLARATIONS OF INTEREST

No declarations of interest were received.

3 CONFIRMATION OF THE MINUTES OF THE MEETINGS HELD ON 24 MARCH 2015 AND 13 MAY 2015

Minutes of 24 March - Minute 52, paragraph 3 (page 11) - LB Bromley Local Intermediate Housing Income Threshold Review

The first sentence was amended to read: '*One Member was concerned with the level being raised at a time when employment was low and salaries were not great.*'

Minutes of 13 May - Minute 3(ii), (page 14) - Plans 2 Sub-Committee

Councillor Nicholas Bennett JP to replace Councillor Ian Dunn.

RESOLVED that, subject to the amendments set out above, the Minutes of the meetings held on 24 March 2015 and 13 May 2015 be confirmed and signed as a correct record.

4 QUESTIONS BY MEMBERS OF THE PUBLIC ATTENDING THE MEETING

The following written question was received from Mr Anthony Barnes, Heathfield Road, Keston:-

With regard to Agenda Item 9 of the Committee, are Councillors aware of the sheer weight of traffic that uses Croydon Road onto which this piece of land fronts? This in turn leads to long tailbacks in all directions, heavy congestion and serious road safety concerns.

The Chairman's response was as follows:-

Agenda Item 9 relates to a proposed Article 4 Direction to restrict permitted development rights on the land. It is acknowledged that this is a busy road which reflects its designation as a Strategic Route. The removal of permitted development rights is likely to result in a reduction in any additional traffic that may be generated by any development or use at this land.

5 LB BROMLEY FIVE YEAR HOUSING SUPPLY PAPER JUNE 2015

Report DRR15/055

Members considered the five year housing supply position from 1 April 2015 to 31 March 2020.

The National Planning Policy Framework specified that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements. This report concluded there was a suitable five year housing supply in the Borough, based on the latest London Plan housing policy.

The Chief Planner outlined the content of the report and drew Members' attention to the circulated letter received from Robinson Escott Planning LLP in response to the new housing supply target.

The new target of 641 units in the London Plan was principally due to an increase in small sites allowance identified in the latest London Strategic Housing Land Availability Assessment (SHLAA) by the GLA and accepted by the Planning Inspector following an Examination in Public. One Member questioned why this had not previously been predicted by the Council. The

Chief Planner reported that whilst the Council's concerns had been expressed, the Inspector had accepted the GLA's SHLAA forecasts of what they considered could be provided and this underpins the London Plan housing policy. This and the delivery of sites over the five year period can be clarified.

The Government had introduced Regulations in May 2013 to extend permitted development rights allowing for a change of use from B1(a) to C3 subject to a prior approval process up to May 2016 although the long-term future of this process is unclear.

The new 10 year housing delivery period had begun in April 2015. Targets which had been exceeded in any one year, could normally only be carried over during this 10 year period and not beyond.

With regard to the five year housing land supply table on page 30 of the report, officers would liaise with Members who during the meeting, queried sites identified within their Wards, and make minor amendments in response to these and other matters raised at the meeting.

RESOLVED that, subject to liaison with Members concerning sites identified within their Wards, the five year housing supply position from 1 April 2015 to 31 March 2020 be agreed with minor amendments.

Subsequent to the meeting, the Housing Supply table was updated; the amended version can be viewed at Appendix 1 to these Minutes with changes shown underlined in red.

6 MINOR ALTERATIONS TO THE LONDON PLAN CONSULTATION DRAFT HOUSING STANDARDS AND PARKING STANDARDS

Report DRR15/062

Members considered the Minor Alterations to the London Plan on Housing Standards and Parking Standards. These were prepared to bring the London Plan in line with new national housing standards and car parking policy.

Members also considered the Local Authority's response to the Mayor of London in relation to the Minor Alterations to the London Plan.

One Member supported the continuation of pursuing the proposal that the DLR be extended into Bromley.

Whilst Members welcomed what they considered to be 'a small step in the right direction', they agreed that more flexibility in parking provision was required. It was suggested that the Local Authority's response to the Mayor be strengthened to draw his attention to the fact that Members were far more knowledgeable of the needs and requirements within their own Wards.

The Head of Planning Strategy agreed to check and inform Members whether the target for water usage of 105 litres per day related to per household.

The following amendment was made to the Local Authority's response to the Mayor of London:

Parking Standards, page 40, paragraph 1, final sentence:- 'However, *whilst the overall* direction of the alterations is welcomed,

RESOLVED that:-

- 1) **the Minor Alterations to the London Plan 2015 housing Standards and Parking Standards be noted; and**
- 2) **subject to the amendment highlighted above, the proposed response to the Mayor of London in relation to the Minor Alterations to the London Plan be endorsed.**

7 AUTHORITY MONITORING REPORT 2012/13

Report DRR15/059

All local Authorities are required under Section 13 of the Localism Act 2011, to produce an Authority Monitoring Report (AMR). The AMR should set out progress achieved in the implementation of the Local Development Scheme, the progress and effectiveness of the Local Plan and the extent to which the policies set out in the Local Plan were being achieved.

In accordance with the requirement set out above, Members considered the Council's Authority Monitoring Report for 2013/14.

Paragraph 5.6 (page 59) was amended to read:- 'The total number of dwellings completed as affordable housing in 2013/14 was 117 units in comparison with 161 units in 2012/13 and 213 units in 2011/12.

Officers agreed to check and report back to Members on the following questions:-

- page 50 - what was the confirmed total of Bromley's Population 2011;
- page 54, para 4.9 referred to five District Centres but only four were listed; what was the fifth?
- page 64, para 8.4 (Education) – Of the 86 applications lodged, 37 related to school provision and 3 related to day nurseries. What did the remaining 46 applications relate to?

RESOLVED that the Authorities Monitoring Report for 2013/14 be agreed.

8 PLANNING REPORTS

8.1 (15/00969/FULL2) - Manorfields, Avalon Road, Orpington

Members considered the following planning application report:-

Item No.	Ward	Description of Application
8.1 (page 81)	Orpington	Change of use from care home for the elderly (Class C2) to short term accommodation for the homeless (Sui Generis), refuse store and alterations to fenestration.

The Development Control Manager provided Members with the following verbal update:-

This application is submitted by the London Borough of Bromley.

Since a variety of issues which are not generally material planning considerations have been raised in representations about this application, Members should ensure that the determination of the application is in accordance with Section 38(6) of the Planning and Compulsory Purchase Act which states that this must be made in accordance with the development plan unless material considerations indicate otherwise. The report sets out the key material planning considerations and in particular the relevant development plan policies.

A number of late representations have been received and are on the file. The matters raised are similar to those set out in the summary of objections within the report and in addition express concern about the process.

1. The second paragraph on page 82 – Statement regarding referral of tenants is incorrect – the applicant has confirmed “All referrals will be made solely by the Housing Team at the London Borough of Bromley” the Housing Team would have sole nomination rights to the accommodation and Orchard and Shipman cannot select tenants themselves or receive referrals from a third party.
2. In respect of references to Supported Housing the applicant has confirmed that the accommodation proposed is for specialist accommodation for homeless households with low to medium support needs, and would not be used for supported housing for those with high support needs such as pronounced mental health issues, ongoing addictions or ex-offenders. This could be the subject of a planning condition.
3. Reference to House In Multiple Occupation (HMO) – The Council’s Environmental Health Housing Officer has confirmed that the HMO is exempt from HMO restrictions will not be licensable and the legislation “Management

of Houses in Multiple Occupation (England 2006) will not apply. The maximum occupation of the HMO units would be 102 persons if all units were at maximum occupation. The self-contained units would accommodate an additional maximum of 16 persons (total 118). The revised plans submitted in May overcome the concerns raised in the report about light and ventilation. This updates the reported comments on pages 85 and 86 of the agenda.

4. Page 84 last bullet point of summary of objections should refer to 5 years and not 5 days.

Oral representations in objection to the application were received from Mr Ned Helme, Barrister for the Avalon Area Action Group (AAAG). Mr Helme made the following points:-

This was clearly a Local Authority application and Members were requested to be mindful of the required approach in determining the application and the issues of predetermination and bias. The AAAG's letter to the Planning Department of 22 April raised some fundamental objections. The application should be determined in accordance with the Development Plan unless material considerations indicated otherwise.

The site was not a sustainable location. The proposed facility would be served by just one bus service operating on a circular route. With regard to traffic and parking, as the facility would essentially provide accommodation for families, this was likely to generate more traffic in the immediate locale and the proposed provision of 17 car parking spaces would result in a lower parking level than that provided at Bellegrave.

For reasons of over-intensification, unsustainability, parking levels, impact on local services, security and impact on character and amenity, Members were urged to reject the application.

Oral representations in support of the application were received from Mr Jim Bailey, agent for the applicant. Mr Bailey made the following points:-

The proposal would meet social need as an alternative to costly hotels and bed and breakfast accommodation. The amenity of neighbouring residents would be protected by ensuring that high standards of behaviour were achieved and maintained by tenants. The existing bus route was sufficient to serve the site and parking standards had been met.

In response to Member questions, Mr Bailey confirmed that the maximum number of tenants at the facility would not exceed 118. With regard to obtaining Secure by Design Certification, following the advice of the Secure by Design Officer, security cameras and secure locks on all windows and doors would be implemented and completed prior to occupation of the building. Mr Bailey believed the proposal was comparable with the existing Bellegrave facility which was operated by the same company and provided the same type of accommodation. He was not aware of any problems arising

at Bellegrove. Tenants would remain at the facility until the Local Authority found them more permanent accommodation. The proposed one-bedroom units would primarily be utilised by single pregnant women or women with children.

Oral representations in support of the application were received from the Portfolio Holder for Care Services, Councillor Robert Evans. Councillor Evans made the following representations:-

Whilst Care Services was operated as efficiently as possible, there was currently great financial pressure to save money in all service areas of the Council. However, that being said, it remained vitally important to support the Borough's vulnerable residents. There were currently about 1,000 homeless family units, 70-80% of which included at least two children. The Council had a duty to accommodate homeless people until a more permanent residence was found. The use of redundant care homes as temporary accommodation would save the Council from having to pay for nightly accommodation - often out-of-Borough - which was expensive and quite often ruinous to families.

Manorfields would provide a similar arrangement to Bellegrove which had proved to be a financial success. Whilst the fears of local residents was understandable, potential tenants would be thoroughly vetted to ensure that no problematic clients were placed at Manorfields and in this respect, they would be required to sign a tenancy behaviour agreement.

In response to Member questions, Councillor Evans reported that a cross-section of residents would be placed at Manorfields with each application being assessed individually. The facility was located at a reasonable distance from Orpington Town Centre.

Oral representations were received from Ward Member Councillor William Huntington-Thresher. Councillor Huntington-Thresher commented that in light of the updates provided at the meeting, it was only reasonable for residents to have an opportunity to challenge and respond to any further conditions that may be attached to the proposal.

Councillor Fawthrop considered the provision of 12 bathrooms and 3 kitchens shared by 118 people to be insufficient. In his opinion, the application was an over-intensification of the site which could be developed into something more suitable and accommodating. For this reason he moved that the application be deferred to seek a reduction in units.

Councillor Arthur moved that the application be granted provided a robust vetting process of tenants was implemented. This was seconded by the Chairman.

Councillor Auld seconded the motion for deferral. Whilst not entirely against the proposal, the application as it currently stood, would result in a

development which would be out of character with the area and would result in an increase in traffic.

The following points were generally agreed:-

- there would be no increase in the footprint of the site;
- the Council had a social duty to help homeless people in the Borough;
- the facility was located within reasonable distance of Orpington Town Centre and served by a bus route operating every 15 minutes;
- there were no reasons to refuse the application on planning grounds.

Members having considered the report, objections and representations, **RESOLVED that PERMISSION BE GRANTED as recommended, subject to the conditions and informative set out in the report of the Chief Planner.**

9 LAND ADJACENT TO THE DRIFT, KESTON BR2 8HL

Report DRR15/064

Members were requested to consider an Article 4 Direction in relation to land adjacent to The Drift, to remove permitted development rights for various classes of development. This land had been identified as being a sensitive area of Green Belt and vulnerable to development that may be carried out under permitted development which could harm the openness and character of the area.

Members were pleased to note the request for an Article 4 Direction to protect this sensitively located piece of Green Belt land. Although already protected to a certain degree, development under existing permitted development rights could have a major impact on the land and lead to increased traffic congestion.

RESOLVED that the proposed Article 4 Direction be endorsed and the Portfolio Holder for Renewal and Recreation be recommended to authorise an Article 4 Direction for land adjacent to The Drift to remove permitted development rights for the following classes of development in the Town and Country Planning (General Permitted Development) Order 2015:-

- (i) **erection or construction of gates, fences, walls or other means of enclosure (Class A of Part 2);**
- (ii) **formation, laying out and construction of means of access (Class B of Part 2);**

- (iii) provision of temporary buildings, etc (Class A of Part 4);
- (iv) temporary uses of land for any purpose for not more than 28 days per year (Class B of part 4); and
- (v) use of land as a caravan site (Class A of Part 5).

It was further recommended that the Direction be made with immediate effect for the classes of development specified in (i) to (v) as the Council considered that development could be prejudicial to the proper planning of the area or constitute a threat to the amenities of the area.

10 CONFIRMATION OF PROPOSED ARTICLE 4 DIRECTIONS BROMLEY TOWN CENTRE

Report DRR15/045

Members were requested to consider Article 4 Directions in relation to three areas of Bromley Town Centre on the basis that it was expedient to do so to avoid harmful impacts upon the local economy.

The effect of the Directions would be that a change of use from Office (Use Class B1(a) to Residential (Use Class C3) would require planning permission removing the 'permitted development rights' under Schedule 2 of the GPDO 2015.

As Ward Member for Bromley Town Centre, the Chairman reported that she and her Ward colleagues supported the making of the Article 4 Directions as a large amount of office use had already been lost to Bromley Town.

Whilst Councillor Bennett JP did not specifically disagree with the making of Article 4 Directions, he did recognise that the world was changing and in cases where offices had remained vacant for some considerable length of time, it could make more sense for a change of use to be implemented.

RESOLVED that:-

- 1) the confirmation of the Directions on the basis that it was expedient to restrict the change of use from offices to residential in parts of Bromley Town Centre be endorsed;**
- 2) this matter be referred to the Renewal and Recreation PDS Committee where the Portfolio Holder be recommended to:-**
 - a) confirm the Article 4 Direction to remove the Permitted Development of Class J (now O) to come into effect on 1 August 2015 for the Bromley North Area (as shown on the map);**

- b) confirm the Article 4 Direction to remove the Permitted Development of Class J (now O) to come into effect on 1 August 2015 for the London Road Area (as shown on the map); and**
- c) confirm the Article 4 Direction to remove the Permitted Development of Class J (now O) to come into effect on 1 August 2015 for the Bromley South Area (as shown on the map).**

11 PLANNING APPEALS - COSTS 2014/2015

Report DRR15/054

Members considered an update on the award of costs in planning appeals for the 2014/2015 financial year.

Members agreed it was important to reinforce their reasons for refusing applications as the majority of costs was awarded due to lack of evidence.

Regarding Case Ref 14/00104 – 1 Edward Road (page 119), the Chief Planner agreed to check and report back to Members on the reason for non-determination of this application.

Councillor Fawthrop recommended that Members' views and knowledge should be used on occasion to strengthen reasons for refusal.

RESOLVED that the report be noted and Members' views and knowledge be used to strengthen reasons for refusal.

12 PLANNING APPEALS MONITORING REPORT (APRIL 2014 TO MARCH 2015)

Report DRR15/048

Consideration was given to an update on planning appeals received and decided for the year 2014/15.

Councillor Bennett JP was disappointed to note that Bromley had lost 48% of appeals compared to the national figure of 34%; this clearly indicated existing issues which needed to be addressed.

Councillor Michael reported that the Local Authority had won more cases with written representations compared to the national average. The Local Authority dealt with more contentious applications due to issues such as the resulting impact on Green Belt land.

RESOLVED that the report be noted.

13 DELEGATED ENFORCEMENT ACTION (JANUARY TO MARCH 2015)

Report DRR15/057

The report outlined enforcement action and prosecutions authorised by the Chief Planner under Delegated Authority during the period 1 January 2015 to 31 March 2015.

RESOLVED that the report be noted.

14 ENFORCEMENT MONITORING REPORT (APRIL 2014 TO MARCH 2015)

Report DR15/058

The report provided an update of enforcement activity from 1 April 2014 to 31 March 2015.

With regard to the prosecution case being processed for Pickhurst Lane, West Wickham, the Chief Planner confirmed that information had been sent to relevant Ward Members however, as Ward Member for West Wickham, Councillor Bennett JP, was unaware of the case. The Chief Planner agreed to check that the information had been sent to the correct Ward Members.

One Member suggested that direct actions undertaken by the Local Authority should be publicised as a warning to others that non-compliance with notices was not accepted.

RESOLVED that the report be noted.

15 MINOR AMENDMENTS TO THE SCHEME OF DELEGATION

Report DCS150079

Members were asked to consider proposed minor amendments to Development Control Committee delegations to authorise officers to act on behalf of the Council; if approved, this would be referred to Council for inclusion in the Scheme of Delegation to Officers.

It was reported that the proposed change to para. (vi) on page 145, was recommended to ensure that the Council would be able to appeal if necessary. Councillor Fawthrop had concerns with regard to costs being awarded against the Council and recommended that the wording be changed to read:- *'determine whether or not to contest an appeal against non-determination and where relevant provide grounds of appeal and contest all appeals including all action necessary to prevent or reduce the likelihood of an award of costs against the Council.*

Paragraph (i) under the heading of 'Notes' (page 147) was amended to read:-
'No decision will normally be issued within 3 weeks of the date of the weekly
lists supplied to Members.

RESOLVED that subject to the amendments outlined above, the proposed minor amendments to development Control Committee delegations be approved and referred to Council for inclusion in the Scheme of Delegation.

The meeting ended at 9.20 pm

Chairman

LB BROMLEY FIVE YEAR SUPPLY OF HOUSING

FIVE YEAR SUPPLY OF DELIVERABLE LAND FOR HOUSING (June 2015)

1.0 NATIONAL AND LONDON-WIDE POLICIES AND GUIDANCE

NATIONAL PLANNING POLICY FRAMEWORK (NPPF) (March 2012)

- 1.1 The NPPF specifies in paragraph 47 that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.
- 1.2 The NPPF specifies that to be considered deliverable, sites should be available now, offer a suitable location for development, be achievable with a realistic prospect that housing will be delivered on the site within five years and that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years.
- 1.3 Paragraph 48 states that local planning authorities may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.
- 1.4 Paragraph 49 specifies that housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five year supply of deliverable sites.

NATIONAL PLANNING PRACTICE GUIDANCE (NPPG) (March 2014)

- 1.5 The NPPG specifies that housing requirement figures in up-to-date adopted Local Plans should be used as the starting point for calculating the five year supply. Where evidence in Local Plans has become outdated and policies in emerging plans are not yet capable of carrying sufficient weight information provided in the latest full assessment of housing needs should be considered.
- 1.6 Deliverable sites for housing could include those that are allocated for housing in the development plan and sites with planning permission (outline or full that have not been implemented) unless there is clear evidence that schemes will not be implemented within five years. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites. Demonstration of a five year supply is a key material consideration when determining housing applications and appeals.

LONDON PLAN (2015)

- 1.7 The London Plan para 3.14A and Policy 3.3 specifies that minimum housing supply targets for each borough are set out from 2015 until 2025. For Bromley Borough, this target is 641 dwellings per annum. These targets are informed by the GLA's Strategic Housing Market Assessment (SHMA) (2013) and London's housing land capacity as identified through the 2013 GLA Strategic Housing Land Availability Assessment (SHLAA). Consistent with the NPPF this approach takes account of London's locally distinct circumstances of pressing housing need and limited land availability and aims to deliver sustainable development. Paragraph 3.17 sets out that on the supply side, the London

APPENDIX ONE

SHLAA is designed to address the NPPF requirement to identify supply to meet future housing need as well as being 'consistent with the policies set out in this Framework' (para. 47 NPPF) not least its central dictum that resultant development must be sustainable.

- 1.8 The SHLAA methodology is designed to do this authoritatively in the distinct circumstances of London, including the limited stock of land here and the uniquely pressurised land market and dependence on recycling brownfield land currently in existing uses. The methodology has been developed and refined over time through partnership working with boroughs and others involved in London housing as well as to reflect the principles of government guidance on preparation of SHLAAs nationally (2007 practice guidance).
- 1.9 The London Plan (para 3.19A) observes that national policy requires boroughs to identify a supply of specific deliverable sites sufficient to provide 5 years' worth of housing against their requirements with an additional buffer of 5% moved forward from later in the plan period. In compiling their 5 year supply estimates boroughs should demonstrate that they have maximised the number of identified sites. However, given London's reliance on recycled land currently in other uses and the London SHLAA's evidence, it must be recognised that in addressing this national objective, capacity which elsewhere in the country would be termed "windfall" must here form part of the 5 year supply. In order to support the range of activities and functions required in London as set out in this Plan application of the 5% - 20% buffers should not lead to approval of schemes which compromise the need to secure sustainable development as required in the NPPF (paragraph 3.19A).

2.0 LONDON BOROUGH OF BROMLEY FIVE YEAR HOUSING SUPPLY

- 2.1 This paper sets out Bromley's position on five year supply (01/04/15-31/03/20).
- 2.2 Policy H1 of the Adopted Unitary Development Plan (2006) deals with housing supply (11,450 units) over a period of 1997-2016. This period originates from the GLA London Housing Capacity Study (2000). The Study has been superseded by three other Assessments based on 10 year periods and incorporated into the London Plan (2008, 2011 and 2015). It is considered that the current London Plan (2015) is the most up to date Plan to take into consideration for housing supply targets and reference to a 20 year period for monitoring purposes is no longer relevant.¹
- 2.3 An annual housing target figure of 485 units applied to the Borough from 2007/08 – 2010/11 as a result of the Borough participating in the 2005 London Housing Capacity Study.
- 2.4 The Council contributed to the London-wide SHLAA / Housing Capacity Study (SHLAA, 2009). As a result of the Assessment an annual housing monitoring target of 500 units was allocated to the Borough in the 2011 London Plan for the plan period 2011/12 – 2020/21. The Council also contributed to the GLA's SHLAA 2013 which assigned an annual housing monitoring target of 641 units to the Borough and has been adopted through the 2015 London Plan (consolidated with alterations since 2011). The 2013 SHLAA shows that the basis for the increased target from 500 to 641 per annum for Bromley is comprised of small sites.
- 2.5 The 2009 SHLAA attributed a small site capacity of 195 units out of an overall target of 500 units for the Borough. This figure increased to 352 units out of an overall target of 641 units within the 2013 SHLAA resulting in a 157 increase in small site capacity based on historic delivery rates, by comparison with an overall increase in the target of 141.

Current housing provision targets and delivery

¹ GLA advise (Jan 2011) that targets from previous plan periods do not accrue.

APPENDIX ONE

- 2.6 Table 1 below illustrates that housing completions have exceeded the current annual target (2007 – 2013) and are in excess of the cumulative target by 859 units. In light of this delivery it is considered that a buffer of 5% is relevant.

Financial Year	Completions (units)	Cumulative Completions	Cumulative Target
2007/08	713	713	485
2008/09	494	1207	970
2009/10	553	1760	1455
2010/11	672	2432	1940
2011/12	566	2998	2440
2012/13	646	3644	2940
2013/14	605	4249	3440
2014/15	550 (Est)	4799	3940

Table 1 Completions 2007/08-2014/15

- 2.7 Table 2 sets out the Borough's position on housing delivery against the current ten year target (2015/16 – 2024/25). During the five year supply period Table 2 shows that the Borough needs to deliver 3205 units.
- 2.8 Completions known to date for 2014/15 are in the region of 450 units on sites of 9 units and larger. Therefore an estimate of 550 units for the year is considered reasonable and likely to be exceeded.

Financial Year	Completions needed	Cumulative Target
2015/16 – 2019/20	3205	3205
2020/21	641	3846
2021/22	641	4487
2022/23	641	5128
2023/24	641	5769
2024/25	641	6410

Table 2 Housing Targets LB Bromley 2015/16 – 2024/25

- 2.9 The 5% buffer would increase the five year figure from 3205 units to 3365 units.

Five year supply position

- 2.10 The following sites make up Bromley's five year supply (based on units available and not whole sites) and are set out in Appendix 1 to this paper:
- Large (0.25 ha+) with planning permission and small sites approach;
 - Large and small sites that have commenced;
 - Relevant large identified sites;
 - Other large known sites;
 - Long term vacant units brought back into use;
 - Sites granted prior approval.

a) Large with planning permission and small sites approach

- 2.10 Under the London Plan / 2013 SHLAA small sites are those <0.25ha and large sites are those >0.25ha.

APPENDIX ONE

- 2.11 Sites of 9+ units were assessed to determine if they would be deliverable over the five year period. Where relevant, developers/agents were contacted to establish if sites were likely to be brought forward or if a start date was known. In some cases developers were able to confirm that work had already started on site or was imminent. If sites were unlikely to be pursued within the five year timescale they were removed from the list. Relevant sites are listed in Appendix 1.
- 2.12 As part of the London-wide SHLAA 2013 an assessment was made of the contribution that small sites (<0.25ha) have made to housing delivery within each borough from 2004/05 – 2011/12. The figure was derived by taking an average of small site completions (new build, conversions and changes of use) 2004/05 – 2011/12 and removing 90% of new build completions built on garden land. The annual average figure for the Borough during this time period was 352 units. Over the ten year London Plan period (2015/16 – 24/25) the small site windfall figure could contribute 3520 units and over five years 1760 units. The London-wide SHLAA 2013 forms part of the evidence supporting the recently updated London Plan (2015). Paragraph 1.9 above sets out the London Plan approach to including ‘windfall’ sites within boroughs five year housing supply papers.
- 2.13 It is considered that delivery on small sites is not insignificant and has been demonstrated over the relevant eight year period. The small sites allowance within the five year housing supply is based on London Plan (2015) evidence within the 2013 SHLAA as endorsed by the Inspector into the examination of the Further Alterations to the London Plan. The inclusion of approximately 1757+632 units, as set out in Appendix 1, over five years is deliverable and takes into account advice set out in paragraph 48 of the NPPF and paragraph 3.19A of the London Plan. Of importance is the fact that nearly over one third of these sites are identified and include:

Small sites	No. of units
Units with planning permission or commenced	190
Allocated	10
Office to residential PD granted (9+ units)	<u>15479</u>
Office to residential PD commenced (9+ units)	<u>8838</u>
Site <9 units and <0.25 ha commenced (includes 50 office to residential units)	170
Other known sites	45
Future delivery of other small sites with planning permission	1100
TOTAL	<u>1757+632</u>

Table 3: Small sites included within five year housing supply

b) Sites that have commenced

- 2.14 Sites that have started are considered deliverable over the five year supply period. Any large completed sites were removed from the list in addition to units on uncompleted large sites (up to March 2015).
- 2.15 There are approx. 170 units on small sites that have started and it is expected that these will be delivered by the end of the five year supply period (includes office to residential PD units).

c) Large identified sites

- 2.16 Site B within the Bromley Area Action Plan (BAAP, adopted October 2010) was included in the 2013 SHLAA results for Phase 2 of the Assessment. The BAAP states the site could accommodate 70 residential units on site. It is considered that 40 units could be deliverable in the five year period.
- 2.17 Development at Site K (Westmoreland Road) including 200 residential units was granted planning permission in March 2012 and work has commenced on site.

APPENDIX ONE

2.18 Site C within the BAAP was included in the 2013 SHLAA results for Phase 3 (2020 – 2025) of the Assessment. The BAAP states that the site could accommodate around 20 units. There is a possibility that this site may be delivered during an earlier phase, therefore an estimate of 20 units has been attributed to the five year housing supply.

d) Other known sites

2.19 Other known sites that are considered deliverable are included in Appendix 1. These include 2 sites that have been granted planning permission but are awaiting the finalisation of Section 106 agreements (57 Albemarle Road, Beckenham and 165 Masons Hill, Bromley), and an additional site (Sundridge Park Manor) where a previous planning permission has expired but an amended scheme is pending consideration.

e) Long term empty homes (longer than 6 months) returning to use

2.17 The GLA advise that long term empty homes returning to use can be included in calculating completion targets for boroughs. The 2013 GLA SHLAA attributes an annual target to some boroughs in relation to reducing long term vacant properties (6 months+) to 0.75% of overall stock. The percentage of long term vacant units within the borough is less than 0.75% and therefore a target has not been allocated. Importantly though any long term vacant properties that are brought back into use can still count towards annual completion data. GLA Annual Monitoring Data on vacant units is compiled using DCLG Live Table 615 (Live tables on dwelling stock including vacants). On average since 2004 approximately 88 long term vacant units have been returned to use per annum. It is considered that the overall long term vacant figure for the borough has declined significantly over this period (2004, 1506 units; 2013, 709 units) but a conservative allocation of 100 units over the five year period would be reasonable.

f) Changes of use from office to residential

2.14 The Government introduced Regulations in May 2013 to extend permitted development rights allowing for a change of use from B1(a) to C3 subject to a prior approval process up to May 2016. A minimum of 454310 units have been approved through this process up to March 2015 and approximately 14090 units have commenced and are included in Appendix 1 of this Paper.

2.15 It is considered that during the five year housing supply period an estimated delivery of an additional 150250 units would be reasonable. To date there are approximately 60 units in this category that have commenced and/or have building control notices accepted and have not been counted elsewhere in the five year housing supply. There are approximately 100 units submitted through the prior approval process that are currently pending a decision.

2.16 Contributions from this source up to the end of May 2016 are likely to include large and small sites.

Conclusion to date

2.23 The Council's five year housing supply position will be monitored and updated on a regular basis.

2.24 The sites listed in Appendix 1 are considered to be deliverable within the five year housing supply period.

2.25 Appendix 1 illustrates that Bromley is able to meet its five year supply target of 3365 units (including the 5% buffer) given that there are 34653440 deliverable units in the pipeline. In light of this, regard will be had to policies in the London Plan, the Bromley Development Plan, the NPPF, the NPPG and other material considerations when assessing new planning applications.

Summary of five year housing supply

APPENDIX ONE

Five year housing supply capacity		Five year housing supply targets
Known sites with planning permission not commenced	<u>795720</u>	Target of 641 units per annum x 5 = 3205 units
Known sites commenced (up to end March 2015)	<u>1021971</u>	3205 units plus 5% buffer = 3365 units
Allocated sites	70	
Other known sites	59	
Small sites started (including prior approval)	170	
Small sites allowance	1100	
B1(a) to C3 Prior Approval allowance	<u>150250</u>	
Vacant units brought back into use	100	
TOTAL	<u>34653440</u>	
Conclusion: Five year housing supply exceeds target of 3365 units		

APPENDIX ONE

FIVE YEAR HOUSING LAND SUPPLY 01/04/15 to 31/03/20

Borough Reference	Net Gain Excluding unit comp.	Site Area (ha)	Site Size	Site Address		Post Code	Ward	Current Permission Status	Date of PP
Sites with permission not commenced									
<i>14/00449/RESPA</i>	<i>75</i>	<i>0.12</i>	<i>Small</i>	<i>County House</i>	<i>221-241 Beckenhalm Road</i>	<i>BR34 UF</i>	<i>CLOCKHOUSE E</i>	<i>Not started</i>	<i>28/03/2014</i>
13/03889/FULL1	16	0.18	Small	The Rising Sun	166 Upper Elmers End Road	BR3 3DY	KELSEY AND EDEN PARK	Not started	09/04/2015
14/03316/FULL1	83	0.2	Small	Orpington Police Station	The Walnuts Orpington	BR6 0TW	ORPINGTON	Not started	17/04/2015
14/02086/RESPA	79	0.1	Small	Berwick House	8 - 10 Knoll Rise	BR6 0E	ORPINGTON	Not started	14/11/2014
12/01843/FULL1	9	0.4	Large	20-22	Main Road	TN16 3EB	BIGGIN HILL	Not started	04/06/2013
13/03467/FULL1	74	0.28	Large	Dylon International Ltd	Worsley Bridge Road	SE26 5HD	COPERS COPE	Not started	16.02.2015
14/00820/OUT	45	1.09	Large	Grays Farm Production Village	Grays Farm Road	BR5 3BD	CRAY VALLEY WEST	Not started	12/03/2015
14/03991/FULL1	46	1.4	Large	The Haven	Springfield Road		CRYSTAL PALACE	Not started	31/03/2015
14/03236/RESPA	12	2.5	Large	Bassetts House	Broadwater Gardens	BR6 7UZ	FARNBOROUGH AND CROFTON	RESPA GRANTED	15/10/2014
14/01873/FULL1	21	0.57	Large	Isard House	Glebe House Drive		HAYES AND CONEY HALL	Not started	10/12/2014
14/02364/FULL1	23	2.6	Large	Hayes Court	West Common Road		HAYES AND CONEY HALL	Not started	17/12/2014
12/00976/OUT	179	10.6	Large	GlaxoSmithKline Langley Court	South Eden Park Road	BR3 3BS	KELSEY AND EDEN PARK	Not started	17/06/2014
13/00905/OUT	38	0.4	Large	25	Scotts Road	BR1 3QD	PLAISTOW AND SUNDRIDGE	Not started	11/06/2014
12/03606/FULL1	41	2.27	Large	Sundridge Park Management Centre Ltd	Plaistow Lane	BR1 3TP	PLAISTOW AND SUNDRIDGE	Not started	06/11/2013
14/03324/FULL1	54	0.5	Large	Summit House	Glebe Way	BR4 0RJ	WEST WICKHAM	Not started	02/04/2015
Total	<i>795720</i>								
Sites Commenced									

APPENDIX ONE

Borough Reference	Net Gain Excluding unit comp.	Site Area (ha)	Site Size	Site Address		Post Code	Ward	Current Permission Status	Date of PP
13/02222/RESPA	27	0.2	Small	Archers Court	48 Masons Hill	BR2 9JG	BROMLEY TOWN	Started	08/09/2013
<i>14/04850/RESPA</i>	<i>50</i>	<i>0.19</i>	<i>Small</i>	<i>Title House</i>	<i>33-35 Elmfield Road</i>	<i>BR1 1LT</i>	<i>BROMLEY TOWN</i>	<i>Started</i>	<i>10/02/2015</i>
14/01932/RESPA	11	0.05	Small	Babbacombe House, 2	Babbacombe Road	BR1 3LW	BROMLEY TOWN	Started	12/05/2014
10/02346/FULL1	9	0.11	Small	125	Park Road	BR3	COPERS COPE	Started	07/09/2011
12/00304/FULL1	50	0.23	Small	76	High Street	BR6 0JQ	CRAY VALLEY EAST	Started	06/02/2013
12/03859/FULL1	9	0.13	Small	193	Anerley Road	SE20 8EL	CRYSTAL PALACE	Started	26/03/2013
04/03547/FULL1	10	0.01	Small	Fair Acres Estate	Fair Acres	BR2 9BL	HAYES AND CONEY HALL	Started	21/01/2005
09/00422/FULL1	13	0.1	Small	Plaistow Lane Service Station	Plaistow Lane	BR1 4DS	PLAISTOW AND SUNDRIDGE	Started	11/11/2009
11/01412/FULL1	4	0.26	Large	49	Sunningvale Avenue	TN16 3BX	BIGGIN HILL	Started	21/07/2011
07/03632/FULL1	160	0.27	Large	Land At South Side Of	Ringers Road	BR1 1HP	BROMLEY TOWN	Started	04/01/2008
11/03865/FULL1	200	0.96	Large	Site K Multistorey Car Park	Simpsons Road	BR1	BROMLEY TOWN	Started	26/03/2012
03/02319/OUT and 10/00740/DET	155	12	Large	Blue Circle Sports Ground	Crown Lane	BR2 9PQ	BROMLEY COMMON AND KESTON	Started	22/11/2007
03/04554/FULL1	6	0.26	Large	Maunsell House, 160	Croydon Road	BR3 4DE	CLOCK HOUSE	Started	26/02/2009
12/00102/FULL1	42	0.9	Large	Graham Chieseman House	St Pauls Cray Road	BR7 6QA	CHISLEHURST	Started	26/06/2013
09/01664/FULL1	149	0.28	Large	Dylon International Ltd	Worsley Bridge Road	SE26 5HD	COPERS COPE	Started	15/04/2010
11/02100/FULL1	44	0.35	Large	Land Rear of 86-94	High Street	BR3	COPERS COPE	Started	26/07/2012
11/02140/OUT	33	2.04	Large	Part Of Kent County Cricket Ground	Worsley Bridge Road	BR3 1RL	COPERS COPE	Started	29/03/2012
07/04649/DET	5	0.7	Large	Anerley School For Boys	Versailles Road	SE20 8AX	CRYSTAL PALACE	Started	10/03/2008
13/01670/FULL1	-12	0.78	Large	1	Chilham Way	BR2 7PR	CRYSTAL PALACE	Started	13/03/2014
12/02443/FULL1 and 12/02913/FULL2	56	0.95	Large	Holy Trinity Convent School	Plaistow Lane	BR1 3LL	PLAISTOW AND SUNDRIDGE	Started	07/11/2011

APPENDIX ONE

Borough Reference	Net Gain Excluding unit comp.	Site Area (ha)	Site Size	Site Address		Post Code	Ward	Current Permission Status	Date of PP
Total	1021971								
Allocated sites									
UDP Proposal Site	10	0.01	Small	Land adjacent Clock House station			CLOCKHOUS E		
Bromley Area Action Plan	40	0.37	Large	Site B Tweedy Road/London Road			BROMLEY TOWN		
Bromley Area Action Plan	20	0.7	Large	Site C Former Town Hall and South Street Car Park			BROMLEY TOWN		
Total	70								
Other sites									
14/01637/FULL1	16	0.16	Small	57	Albemarle Road	BR3 5HL	COPERS COPE	SUBJECT TO S106	
14/04199/FULL1	29	0.13	Small	165 Masons Hill		BR2 9HW	BROMLEY TOWN	SUBJECT TO S106	
14/02683/FULL3	14	3	Large	Sundridge Park Manor	Willoughby Lane	BR1 3FZ	PLAISTOW AND SUNDRIDGE	PCO	
Total	59								
Small sites started									
	170		Small	Various			BOROUGH-WIDE		
Small sites allowance									
	1100		Small	Various			BOROUGH-WIDE		
B1(a) to C3 Prior Approval Sites allowance							BOROUGH-WIDE		
	150250						BOROUGH-WIDE		
Vacant Units	100						BOROUGH-WIDE		
OVERALL TOTAL	34653440								

Subdivision of small and large sites set out above	
Small Sites	16321757
Large Sites	14581458
Prior Approval and Vacant Units	250350
TOTAL	34653440

Application No: 15/00909/FULL1

**Ward:
Kelsey And Eden Park**

**Address : Harris Academy Beckenham, Manor Way,
Beckenham BR3 3SJ**

OS Grid Ref: E: 537430 N: 168596

Applicant : Kier Construction

Description of Development:

Demolition of all buildings on site (except the basketball block) and erection of replacement buildings to accommodate a 3 storey 6FE Academy (8,112 sqm GIA) for 1,150 pupils and a 2 storey primary Academy (2,012 sqm GIA) for 420 pupils together with temporary classroom accommodation for a period of two years, provision of 97 car parking spaces, 170 cycle parking spaces, associated circulation and servicing space, multi-use games areas and landscaping

Key Designations

Biggin Hill Safeguarding Birds
London City Airport Safeguarding
Urban Open Space
Within Manor Way Conservation Area
PTAL 1a

Proposal

Harris Primary Beckenham was given permission by the Secretary of State for Education to open a 2FE primary school in September 2014, however following the refusal of an application for temporary accommodation on this site (14/01636) the opening of the school was deferred for a year to September 2015. The application for temporary primary school classes (14/01636) was allowed on appeal.

The current application is for the new primary Free School 2 Forms of Entry (2FE) and the re-provision of the existing secondary Academy (including 6th form) (6FE) and temporary secondary school provision to provide accommodation during construction of the secondary school.

The application proposes:-

- All buildings except the existing substation, store and basketball block will be demolished;
- Erection of a two storey 'T-Shape' primary school building (2,012 sqm GIA) positioned on an east-west axis within the northeast corner of the site. The building would measure 62m x 30m (largest points) with an overall height of 7.8m. There is a single storey element on the northern elevation which reduces the depth of the extension by 6m at first floor level. The building would be constructed of buff brick (Ibstock Brunswick Buff) with dark grey aluminium fenestration (Kawneer AA541 RAL 7016), opening vents with louvres and curtain walling (RAL 7016) and a flat roof. The roof would incorporate plant and PV panels with an overall height of 1.6m from roof level (9.4m from ground);
- Erection of a three storey rectangular secondary school building (8,112 sqm) positioned on a north-south axis towards the centre of the site. The building would measure 79m x 44m (largest points) with an overall height of 11m. There is a single storey element on the southern elevation which reduces the width of the extension by 12m at first and second floor level. The building would be constructed of the same

buff bricks on the ground floor level with external insulated white render (StoSilco Ltd) on the upper floors, dark grey aluminium fenestration, opening vents with louvres and curtain walling (RAL 7016). The roof would incorporate PVs, plant and rooflights. The plant would have a maximum height of 1.0m from roof level (12m from ground)

- Erection of temporary accommodation for the secondary school to be located adjacent to the basketball block behind the main school building. The double height accommodation would measure 21.6m x 42m x 5.1m high
- Erection of temporary single storey changing facilities also to be located behind the main school building measuring 9.6m x 18m
- Creation of 97 parking spaces (including 6 disabled) in front of the secondary school buildings of which 22 spaces will be dedicated for primary school staff and 75 spaces for the secondary school
- Provision of cycle and scooter stores
- Creation of a new Multi Use Games Area (MUGA) between the secondary school building and parking area in the southeast section of the site and a hardcourt area for the primary school to be located between the primary and secondary school buildings
- Improvements will be made to the pedestrian provision within the existing access road
- Implementation of hard and soft landscaping scheme to complement the new buildings, facilitate improvements to the existing access and create habitat areas
- Existing basketball courts (southern end of site) and grass pitches (western side of site) will be retained
- The new two form entry primary school building (at capacity) will accommodate 420 pupils and 48 members of staff (32 FTE).
- The new secondary school will enable the school to operate at its current approved capacity of 1150 pupils and 125 FTE members of staff (the existing school currently operates at 100 pupils and 100 FTE staff)
- The primary school (including pre and post school clubs) would operate 08:00 – 18:00 weekdays only
- The secondary school would offer its facilities to the local community (which already takes place within the existing school) so would operate 06:30 – 22:00 on weekdays and 09:00 – 16:00 on weekends

Phasing

A phasing plan has been provided to show how the development would be constructed over a period of 2.5 years:

- Phase 1A (four months from start) – installation of temporary classrooms for the secondary school and contractors site accommodation
- Phase 1B (four months from start) – Install temporary classrooms for the primary school (as approved under the appeal decision for DC/14/01636)
- Phase 2 (6 months from start) – asbestos survey removal and demolition of buildings in the northern sections of the site (Enterprise Building/Small Sorts Block and DT Block)
- Phase 3 (months 2 – 14) – construct primary school building anticipated to be complete August 2016 and demolish secondary school buildings
- Phase 4 (months 4 – 24) – construct secondary school buildings anticipated to be complete April 2017 and remove temporary classroom facilities for the primary school
- Phase 5 (14 months from start) – hand over primary school and continue with construction of secondary school

- Phase 6 (months 24-30) – handover secondary school building, remove temporary secondary school classrooms and complete landscaping.

Timing of Submission

The applicant has advised that initial proposals for redeveloping the site commenced in 2014. However, the original contractor appointed in early 2014 had to withdraw from the project for commercial reasons unrelated to the project, which meant the EFA had to repeat its procurement process to find an alternative contractor. Whilst this procurement process was taking place proposed temporary accommodation for the primary school was subject to a separate planning application. Kier were subsequently appointed as the new contractor and have been working with the EFA to bring the project forward. This is the reason for the delay in submitting a full planning application for the provision of a permanent primary school.

The applicant has submitted the following detailed reports to support the application:

Acoustics Assessment and Addendum (prepared by RPS)

This report provides details of external noise levels, internal noise levels within the building and necessary sound insulation. Noise sensitive receptors have been identified (residential properties in Manor Way, Little Acre, Kelsey Way, Village Way and Stone Park Avenue). Two 7 day baseline noise surveys were undertaken. As a result of the surveys sound insulation of facades has been recommended and it is suggested that partially opening windows for natural ventilation is appropriate.

Potential noise levels arising from the external teaching areas has been assessed, the report concludes that external teaching areas should not be used for prolonged periods of time but some external teaching and use of the playground and fields for break times would not cause excessive loss of amenity.

The report recommends that a more detailed plant noise assessment is undertaken once the detailed specification for plant and equipment is known and noise from mechanical services should be designed to be less than 5dB above the L_{A90} background noise. This could be controlled by condition.

The addendum was produced in response to the Council's Environmental Health Officers request for additional information in respect of the impact of additional onsite vehicle movements arising from an intensification of the use. A quantitative approach has been taken to assess the increase in sound levels resulting from an increase in pupil numbers using the external spaces within the site. The assessment shows an increase in +2.1dB as a result of the secondary school operating at capacity and 420 pupils attending the primary school. This is not considered to be significant and would likely not be noticeable.

The report concludes that there would be no change in character or timing of the sound effects. The report further assesses the impact on noise arising from additional traffic movements. Again the report concludes that there would be no significant noise impacts arising.

Air Quality Assessment (prepared by Air Quality Assessments)

This site lies within an Air Quality Management Area but is not located on any through roads so air quality conditions at the site are shown to be better than air quality neutral. The document considers the air quality impacts associated with the development in construction and operational phases. Existing air quality conditions have been identified. The potential dust impacts arising throughout construction have been assessed (traffic and construction related activity). The report concludes that mitigation such as a dust management scheme will be required but subject to appropriate measures being put in place the impacts during construction will not be significant. The report considers the potential for operational impacts (traffic and boiler plant) but concludes that there is no requirement to mitigate operational

traffic impacts due the number if vehicle movements anticipated. It is necessary to ensure that any boilers on the site comply with GLA standards and thus emit less than 40mg NOx/kWh.

Dust management measures are addressed in the Construction Management Plan and Dust Management Plan.

Arboricultural Method Statement (prepared by RPS)

This report includes details of the tree survey undertaken in order to inform the preparation of the arboricultural implications assessment and method statement.

There are a number of trees on the site located in areas of open space, verges and along the site boundaries. A large number of the trees on site will not be affected by the development as they are located on the north, west and southern boundaries far enough away from the development not to be affected. The majority of trees along the existing access route and boundary with Manor Way will be retained although a total of 26 trees and 4 groups need to be removed to facilitate the development. Some tree pruning works will be required.

The report suggests that the demolition of the existing school buildings will require a detailed method statement of demolition works indicating what precautions will be taken to prevent damage to retained trees. The construction process will need to be monitored and the Arboricultural Method Statement used to provide guidance. Tree protection fencing will need to be erected and necessary pruning works sensitively carried out.

Construction Management Plan (prepared by Kier)

This document confirms that all site vehicular access will be via Manor Way with traffic directed to arrive from the north only to avoid the traffic island outside of the site. Regular stakeholder meetings will be held to communicate and share programme of works, methods, specific tasks and opportunities to address any concerns raised. There will be a direct link between the Senior Project Team and local residents. Limited onsite parking for contractor and visitors will be provided and will be managed via a permit system. Car share and use of public transport will be promoted and active management of parking outside the site will be undertaken to ensure that this does cause problems with respect to parking across residents drives or within close proximity of the school entrance. Deliveries will be assigned time slots to avoid peak drop off and pickup times for the school. Use of articulated vehicles will be minimized.

Construction materials and plant will be stored within safe areas inside the site boundary and cleaned before being taken of site. Appropriate site hoardings and heras fencing will be installed to ensure the site is safe and access will be strictly controlled.

Wheel wash facilities will be set up within the site boundary, in addition a local road sweeping company will be employed to maintain the surrounding roads and footpaths.

Kier will register with the Considerate Contractors Scheme. Dust and noise monitoring will take place and level will not exceed British Standards. All works will be undertaken in accordance with relevant HSE Regulations.

The Councils Highways Officer has confirmed that the Construction Management Plan is acceptable.

Design and Access Statement (prepared by Nicholas Hare Architects)

This report sets out the site context, constraints and opportunities. The report confirms that the existing buildings on site have a total footprint of 8,056 sqm, the proposal will significantly consolidate the building area footprint to 5,890 sqm maintaining a 20m zone free of development from most of the site boundaries (existing buildings adjacent to Little Acres will be retained within the 20m zone). On page 34 a comparison diagram shows that there would be an increase in hard sports facilities (increase of 4,247 sqm) and access and parking areas

(increase of 1,496 sqm) but a reduction in hard informal and social landscaped space and an increase in habitat areas and soft informal and social space. Altogether hard landscaped space and building footprint combined would increase by 2,463 sqm.

The report describes the internal layout of each of the buildings and approach taken in terms of massing and architectural treatment.

The report includes a landscape masterplan with details of the widened pedestrian route within the existing access road. Indicative details of boundary treatment have been provided.

The report confirms the access strategy for pedestrians, cyclists, vehicles and servicing. DDA compliant access will be provided throughout the buildings with controlled lift access for staff and pupils with restricted mobility. Appropriate means of escape will be provided.

Dust Management Plan (prepared by Kier)

This document is intended to supplement the air quality assessment. The document has taken account of the GLA SPG 'The Control of Dust and Emissions during Construction and Demolition'. Potential sources of dust generating activity have been identified as well as management procedures.

The document has been reviewed by the Council's Environmental Health Officer and confirmed to be satisfactory.

Drainage Impact Assessment (prepared by Campbell Reith)

This report confirms that the site lies within Flood Zone 1 (low risk). The surface water run-off rates from the existing and proposed developments have been assessed, with the maximum proposed surface water run-off rates being 50% of the existing. Calculations show that even with a 50% reduction, the proposed surface after run-off rate is too high for the existing sewer capacity. Consequently there are requirements for attenuation in the site. Foul water discharge will be via the existing foul sewers on site which discharge the local public sewer in Manor Way.

Energy Strategies x 2 (one for the primary school and one for the secondary school) (prepared by Van Zyl & De Villiers Ltd)

The reports include a baseline energy demand assessment and details of measures that will be incorporated to reduce energy demand and CO₂ emissions. The reports confirm that for both buildings measures taken to reduce energy consumption and carbon emissions will include limiting heat loss through the fabric of the building, avoiding thermal bridging, maximizing natural daylight and ventilation, reducing air permeability, utilizing dimming controls linked to daylight sensors, local light switching, movement and absence sensors for lighting, low energy light fittings, heat recovery mechanical ventilation, low specific fan power and heating controls to optimize plant efficiency. Various low and zero carbon technologies were considered but only PV panels were deemed to be suitable for the development.

It is proposed to explore the use of PVs during the detailed design to achieve 41,971kWh/annum which will bring a total of 24% reduction in CO₂ for the secondary school and 17,526kWh/annum which will bring a total of 35.2% reduction in CO₂ for the primary school building.

Energy Statement Response to LBL Comments on Energy Strategy (prepared by TP Bennett)

This document was submitted in response to Officers concerns with the Energy Strategy in terms of its content and overall carbon reduction for the secondary school building. The response seeks to justify the approach taken in the Energy Strategy by referring to other schemes within the borough. The applicant is of the view that the strategy meets policy requirements and the proposed measures to reduce energy consumption and CO₂ are appropriate for this education site. The document confirms that the primary academy would achieve a carbon reduction of 35.2% and the secondary school a carbon reduction of 24.3%.

The primary school reduction would comply with London Plan policy but the secondary school would fall below London Plan requirements.

Phase 1 Preliminary Risk Assessment and Phase 2 Environmental and Geotechnical Site Investigation Report (prepared by RPS)

The report confirms that no potential sources of current ongoing contamination associated with the site or surrounding area have been identified. An unexploded ordnance report indicates that a heavy anti aircraft battery was present on site during the Second World War, which may represent an historical source of hydrocarbon, metal and asbestos contamination. Four small potentially backfield pond were noted on site which may represent a source of Made Ground. Two tanks potentially containing fuel associated with the historical maternity hospital located to the southwest of the site were also noted. Sampling was undertaken and the report confirms the potential risk posed by on site contaminants of concern to human health receptors is low, potential risk of hydrocarbon compounds is low and risk to surface water receptors and ground gas is also considered to be low.

Planning and Heritage Statement (prepared by TP Bennett)

This statement sets out the site description, planning history, assessment of the proposed development against relevant planning policy and the heritage implications. The applicant considers that the proposal would meet an identified educational need, would not unduly harm the openness of the site, would not have an unacceptable impact on neighbouring amenity, is of an appropriate design which would preserve the character and appearance of the conservation area and would not give rise to a significant detrimental impact on the highway and therefore the proposal is considered to be in accordance with relevant development plan policies.

Statement of Community Involvement (prepared by TP Bennett)

The report states that public consultation was undertaken in respect of the proposal for the replacement secondary school and new primary school. A public consultation exercise was undertaken in January 2014 but the project stalled due to issues with a contractor. As part of the application for temporary primary school facilities a leaflet drop was carried out in December 2014 notifying residents of the intention to re-consult in the New Year on the permanent primary school proposal. A further consultation event was held over 2 days in January 2015. The SCI confirms that 61 people signed the attendance register for the consultation event that took place in January and 50 questionnaires were completed. Some comments from the questionnaire have been included in the document.

Transport Assessment (prepared by RPS)

This assessment covers existing site conditions, trip generation, distribution and development impact and necessary mitigation. The report confirms that the sole access to the site would be via Manor Way, parents will not be allowed to drive into the school but will need to make drop-offs and pick-ups on the local highway network which is the same arrangement as the school currently operating on site. The school gate will remain locked with a member of staff supervising pick-up and drop-off on Manor Way. The nearest bus stops are located on Stone Park Avenue (370m walking distance from the site) which serves bus 352 running at a frequency of every 20 mins. Beckenham Junction Tram and Overground Rail are also located within walking distance of the site.

The report identifies 18 traffic accidents in the vicinity (500m) of the site over the past 5 years of which 15 have been slight and 3 serious with no fatal. One accident involved a child walking to school, this took place in Village Way. No accidents were recorded in Manor Way, the junction with Stone Park Avenue or Kelsey Way.

Manual Classified Turning Counts and parking beat surveys were undertaken on the local highway network during periods where pupils were expected to arrive and depart at the school. In addition staff travel surveys were undertaken for the existing school.

The report confirms that in response to a request by Council Officers to provide drop-off facilities for primary school pupils within the grounds this issue was investigated. However, the applicant has serious concerns about the potential safety impact of parents driving into the school grounds in an area which will be utilized by 420 primary aged children, 1150 secondary aged pupils and staff. The report also considers the request made to open up other pedestrian access points into the site but these have been discounted for the following reasons:

Kelsey Lane – There are advantages to attempting to dissipate the access to the two school sites across the surrounding network in order to minimize demand at one location. However, the access at Kelsey Lane via the small track raises concern in respect of restricted pedestrian access and the impact of having additional vehicle movements in Stone Park Avenue and Kelsey Way. It is considered that parents accompanying their children along the track and across the school field would increase dwell times which could have a worse impact on the highway network than drop-offs in Manor Way.

Stone Park Avenue – pedestrian access to Kelsey Lane can be gained from Stone Park Avenue. However, use of this access would encourage parents to drop-off in Stone Park Avenue which is a key road and bus route. This could cause more congestion.

The report concludes that Manor Way is the only viable option for pedestrian and vehicular access. In terms of trip generation the report concludes that the secondary school will not result in any additional pupils above the current authorized capacity and the trip generation from the primary school could be accommodated on the road network. The report suggests that queueing in Manor Way (north) approach to the junction will occur but will not result in severe driver delay. It is considered that sufficient capacity exists in terms of car parking on local roads to accommodate drop-off and pick up parking demands.

In terms of mitigation the report proposes a travel plan, improvements to the pedestrian route from Manor Way, coordinated service movements for both schools and controlled construction traffic.

The Councils Highways Officer has assessed the Transport Assessment and his conclusions are set out in the main body of this report.

Additional Technical Note: Junction Impact Review (prepared by RPS)

This note was submitted in response to questions raised by the Councils Highways Officer after assessment of the TA. The note considers further the impact of the proposal on the Manor Way/Stone Park Avenue junction. The note confirms that the junction will operate within capacity but there will be short term increases in queues on Manor Way. Short term impact is defined as 30 minute periods during the peak start and finish hours of the school day during term time only.

Travel Plan documents x 2 for the primary and secondary schools (prepared by Harris Federation)

A travel plan has been prepared for each of the schools. The documents set out details of the school operation, admissions policies, opening hours, location public transport links, academy ethos and sustainable travel plan, objectives and an action plan.

The plans have been reviewed by the Councils Travel Plan Coordinator who has confirmed that they do not contain sufficient detail at this at this stage so it is appropriate to attach a condition requiring further submissions.

Updated Ecological Appraisal (prepared by RPS)

The report confirms that an ecological appraisal of the site was undertaken in February 2015. There are 2 statutorily designated sites within 2km of the site and 9 non statutorily designated sites within 2km of the site. As a result of the survey it was concluded that the site has low biodiversity value and is not a recognized nature conservation site although the surrounding hedgerow and trees, mature trees and nature area have some local value. Conserving these

features would ensure that the invertebrate diversity on the site would remain undisturbed and feeding for roosting bats and hedgehogs would not be affected. On the assumption that great crested newt and reptiles might be present in the nature reserve area care should be taken to avoid disturbance to this area and its environs during demolition and construction phase. The report suggests that the three buildings and two trees identified as having potential to contain bat roosts will require further surveys to determine if bats are present before they are demolished or felled. The report further suggests that if any trees or other features likely to support breeding birds are to be removed during the breeding season necessary measures should be undertaken.

Measures to enhance ecology could be included in the detailed landscape strategy such as bird and bat boxes, use of dead wood to create habitat for invertebrates, amphibians and reptiles, inclusion of wildflower species and simple and inexpensive management of the existing pond. The report recommends a ratio of >3 boxes per tree being felled which would equate to a total of 78 bat boxes on the site.

Location

Harris Beckenham School is located on the west side of Manor Way, the school and its grounds are designated as Urban Open Space. The existing school currently comprises an arrangement of 1-3 storey buildings with associated sports facilities, areas of hard standing and parking. The school site is accessed via a short road leading from Manor Way to the east. This existing access will be utilised by staff and pupils as part of the redevelopment .

The school site is bounded on all sides by residential properties in Kelsey Road, Kelsey Way, Village Way, Manor Way and Stone Park Avenue. Southwest of the site is Ralph Perring Court, a two/three storey development for elderly residents. The area is primarily residential in character. Beyond properties in Manor Way opposite the school is Kelsey Park. There are entrances to the Park in Manor Way and Stone Park Avenue. There are no restricted parking measures in place at this point along Manor Way.

Comments from Local Residents and Amenity Societies

This application was advertised in the local press, site notices were erected and letters sent to nearby properties. Following the submission of additional information a re-consultation was undertaken.

Representations have been received from third parties both supporting and objecting to the proposal.

At the time of writing 102 letters of objection had been received. The following issues have been raised in respect of objections

- If the MUGA were to be moved to the rear (west) of the secondary school building this would greatly reduce its impact
- The car park could be moved to the north of the secondary school building (where the primary school is proposed) which would greatly reduce its impact
- This road is already heavily congested and this proposal will make the situation worse
- Increased parking problems for Manor Way
- There have been recent road traffic accidents involving the school
- The school doesn't police children coming and going at the moment so this situation will be made worse
- The existing access is insufficient for construction vehicles
- The existing access is not fit of purpose and cannot accommodate an intensified use
- A 3 storey building will be visible from the road and harmful to the conservation area
- There will be disruption to wildlife and trees
- There is no requirement for additional education facilities in this locality
- It is not local children using this school, the majority arrive by car
- Pupils access to green space and playing fields will be reduced
- The quality of life for pupils will be reduced by overcrowding

- The information given with respect to works to trees in the submitted documents is inaccurate, more work will be required to facilitate the proposal
- This is an unjustified intensification of Urban Open Space as there is no education need in this Ward
- The applicant has refused to consider alternative pedestrian access
- The proposal will degrade the conservation area
- The new buildings will give rise to a loss of privacy for neighbouring gardens and houses
- The new buildings will have an adverse impact on light to neighbouring gardens
- Pupils and staff will be able to see into adjoining residential properties any CCTV would further harm neighbours privacy
- The proposed MUGA is now closer to residential dwellings this will lead to noise and light pollution
- The primary school will result in an increase in pupils (60%), this raises health and safety issues
- There are insufficient means of public transport in this area
- The access into the site is too dangerous for primary school children
- The PINS Inspector for the previous appeal confirmed that little weight had been given to education need. Now that Langley Primary School has been approved there is even less need for additional places in this area
- What sequential tests have been undertaken in respect of harm to the conservation area
- The Councils own evidence base for education need shows that there is only a need in Areas 5 & 6. Other areas have a surplus of places
- There has been no proper consultation between the Developer and residents
- Residents full support the views of KEPA
- If approved this development should include conditions requiring an additional access from Village Way, more car parking spaces, the gates for the vehicular access should be open at all times, a drop off area should be provided adjacent to the primary school, no access should be provided to the green roof
- The Statement of Community Involvement submitted by the applicant is flawed
- The proposal would result in a cramped form of overdevelopment
- The proposal represents a threat to the Urban Open Space
- The increase in pupil numbers and traffic will adversely affect the character of the conservation area, as this is a permanent proposal the harm will be significant and the proposal will permanently and unacceptable alter the character of the conservation area
- The Transport Assessment does not assess the impact of use of the MUGA during non-school hours but this facility is an all-weather pitch which could be used during evening, weekends and holidays.
- The parking stress surveys undertaken are insufficient
- In respect of the primary school the TA assumes that only 43% of pupils will arrive by car, this is a substantial underestimate
- No mitigation for noise pollution has been offered
- A previous application was refused for temporary additional facilities on the site. This was only allowed on appeal because the proposal was for a 5% increase in intensification, was for a temporary period and would not result in permanent impact and no after school clubs. This is completely different to the current proposal
- The Council could use s106 powers to enforce access from Kelsey Way
- The PTAL Rating of this site is very low (1a) so this site is not suitable for additional development as parents will have to drive to the school
- The only educational need is within Areas 5 and 6, other areas have a surplus as shown in the paper reported to the Education PDS Meeting in January 2015. Consequently the primary school is not needed in this area
- The revised information submitted does not address the concerns raised originally
- The new buildings will provide opportunities for overlooking and loss of privacy
- Removal of 26 trees is unacceptable, this will affect wildlife and neighbouring amenity

- The new footpath providing access behind the car park will be located close to residents boundaries causing noise and disturbance
- There will be dust pollution as a result of the construction

Peacock and Smith Planning Consultants submitted a letter of objection on behalf of Kelsey Estate Protection Area (KEPA)

The grounds of objection are summarised below (full comments can be viewed on the application file)

- There are serious shortcomings in the technical evidence which prevents third parties and the council understanding the application
- The acoustic assessment fails to address impact on the amenities of neighbouring residents resulting from increased intensity in use of the site (school buildings and MUGA)
- There are no times stated for use of the all weather pitch which means it could be used during the evenings and at weekends, this could generate noise and disturbance at sensitive times and the need for flood lighting
- The TA does not assess the impact of the site being used at evening, weekends and during holidays
- The parking surveys should have been undertaken in summer when Kelsey Park is used more intensively
- The assumption that 43% of pupils attending the primary school will arrive/leave by car is a substantial underestimate
- Additional information to address the points raised should be submitted
- The proposal will result in trees being felled
- The proposal introduces a new path close to neighbouring gardens which will cause harm to amenity
- There is no evidence that the Travel Plan will be implemented effectively

The applicant has submitted the following response to the objections raised:-

- Residents question the need for additional primary school places in this location, particularly as a further 2FE primary school has been approved for Langley Park within the same education Planning Area. As set out in the submitted Planning and Heritage Statement (section 6.2), the Harris Primary Academy proposal has already been taken into account in the Council's latest Primary School Development Plan reported to the Education Policy Development and Scrutiny Committee on 27 January 2015. In Planning Area 2 (Copers Cope, Kelsey and Eden Park wards) there will continue to be a shortage of Reception places for the foreseeable future even with Harris Primary Beckenham in place (see Planning Statement appendix 5). The proposed Langley Park school would assist in off-setting this deficit, as well as meeting needs from the adjoining Planning Area 1, though it is important to note that this school is not yet the subject of any planning application proposal. The Harris Primary Beckenham has already accepted admissions for its first year of intake (in temporary accommodation) from September 2015.
- The Inspector considering the appeal for temporary accommodation for the Primary School took account of educational need, noting both the LPA's acceptance of the need for additional school places in the Borough and the Education Care and Health Services' support for the application (Appeal Decision 28 January 2015, APP/G5180/A/14/2228314, para 22). He concluded that: "... there is an educational need that the scheme seeks to address and in this context I attach a moderate positive weight to that in the determination of this appeal"
- Residents suggest that the Transport Assessment underestimates the likely impact of the Primary School on local road conditions on the basis of the timing of the surveys undertaken and the basic assumptions about the proportion of primary pupils who will travel to school by car. The scope of the TA was agreed with the Council's highways officer, including the timing of parking beat and dwell time surveys, modal split for staff travel, assignment of journeys to the network and the basis of junction capacity assessments.

- A supplementary technical note was submitted. It is considered that on-street drop-off and pick-up is appropriate and can be accommodated within existing kerbside parking capacity and the existing access road is sufficient and acceptable, no potential alternative access points on Kelsey Way and Stone Park Avenue are suitable and junction capacity assessments are very much a “worst-case scenario” unlikely to be borne out in reality given the nature of the PICADY model and with many trips likely already to be on the network
- The design team has actively considered potential alternative access locations, as well as provision of on-site drop-off and pick-up, but none of these is practical, desirable or achievable. On-site drop-off would push the school buildings further into the site, impacting on its openness, and would create unnecessary turning movements into and out of the school access, and increase vehicular activity adjoining neighbours’ back gardens.
- The basis of the parking surveys and trip generation are the same as those used in assessing the transport impacts of the temporary accommodation for the Primary Academy. It is notable that the Council did not object to the transport impacts of that scheme which effectively introduced two out of the five additional year groups of the Primary Academy to the site (120 of the total 420 pupils). In relation to trip generation the Inspector concluded (para 13) that “this has been derived from mode share surveys undertaken at a number of primary schools in the borough and is thereby reasonably representative.” Furthermore, he emphasised that the impact of traffic “must be considered in the context of the prevailing situation” (para 12) which also involves activity during constrained times (para 13). That prevailing situation also involves parking associated with visits to Kelsey Park, though this unsurprisingly tends to be concentrated around the entrance to the park 260m further north up Manor Way and at the other main entrances on Stone Park Avenue, Wickham Way and at the junction of Court Downs Road and Manor Way.
- School Travel Plans for both the Secondary and Primary Academies will help mitigate potential impacts through a combination of pupil/parent education to avoid car use and on-site management and supervision at school arrival and departure times.
- KEPA suggest that the TA underestimates traffic impacts as it does not allow for out of hours or weekend/holiday use of the school’s facilities. This is to ignore the fact that the school facilities (hall, basketball block) are already in use by local sports and community groups and these trips are already on the network. It is further suggested that the “all-weather pitch” will attract many visits out of hours – but it is not an “all-weather pitch” but rather a multi-use games area (MUGA) for use only by the school.
- It is acknowledged that the proposals will involve an intensification of the site’s use. The pupil numbers would increase from the existing capacity of 1,150 to 1,570, an increase of 37%. The number of staff would rise from 90 to 137 (52%). Some 120 (40%) of the additional Primary Academy pupils will be accommodated initially in temporary accommodation and the Inspector who heard that appeal was satisfied that this increase was acceptable in terms of residential amenity (para 18). Again, he emphasised the fact that such impacts had to be considered in the context of the prevailing situation: “... an existing school grounds where general activity already exists,, ... not therefore a quiet location where such activity would be particularly obtrusive and out of keeping. The times when activity would occur would be in term-time and during the school day and therefore not at particularly sensitive times” (para 18).
- In this context, KEPA’s concerns about noise cannot be substantiated. An addendum to the acoustic assessment (submitted by letter of 27 April 2015) concluded that the increase in pupil numbers would result in an increase in sound levels of +2.1dB (from current conditions) or +1.4dB from the secondary academy’s current capacity. This is not significant and would not likely be noticeable especially given the site’s existing use as a school. In relation to traffic-related noise the sound level change is assessed as being negligible.
- Some residents have expressed concern about a new path running along the eastern part of the site. This was permitted (albeit in a straighter form) as part of the scheme for the Primary Academy temporary accommodation (see drawing no 666HABE-002 rev 3). In any case, the path is located at least 6m from the mature and robust boundary to the adjoining houses in Manor Way.
- The potential disturbance arising from the location and use of the MUGA has also been raised. As noted above, this is not an “all-weather pitch” that would be available for non-school use. Nor would it be floodlit. It is a hard-surfaced area that is available for the

school's use for physical education and informal play only. In developing the scheme design in a way that protects the site's openness (as set out in detail in the submitted Design and Access Statement), the replacement Secondary Academy buildings have necessarily pushed the MUGA a little further east from the position shown in a public exhibition in early 2014; but the distance to the site boundary remains at some 45m and the closest residential building in Manor Way is 78m away. In the context highlighted by the previous appeal Inspector of an existing school, this cannot be considered a material impact on residential amenity.

- The Primary Academy introduces a new 2-storey building into a part of the site that is largely open at present. This is an outcome of the contextual analysis of the site and the pre-application advice that pointed strongly to the desirability of encroaching on the open, western part of the site which is designated Urban Open Space. The new building would be sited behind 7-19 (odd) Kelsey Way and 1-4 (consec) Little Acre (though 1 and 2 Little Acre have an existing sports hall building close to their existing boundary which is to be demolished). As set out in para 6.5.4 of the submitted Planning and Heritage Statement and in the long section drawing (HABE-688-PL-005-00), the separation distances are substantial: 27m to the Kelsey Way rear boundary (62m to the houses themselves) and 20m (45m) to Little Acre; the latter represents an improvement on the existing situation (13m/33m). There is no case therefore that there would be any loss of light to rear gardens of these properties or indeed any adverse impact on privacy; there would be no need for the windows in the northern elevation of the school to be obscure glazed. There is no intention to install CCTV.
- It is notable that no representations on the applications have been received from the occupiers of the two properties adjoining the school access road at 76 Manor Way and 1 Little Acre. Nor have four of the residents in Kelsey Way who back onto the Primary School.
- As set out in the submitted Planning and Heritage Statement (sections 6.6 and 7), there are no public views of the application site from the adjoining Conservation Area. The only public view that includes both the application site and the Conservation Area is from Kelsey Lane to the west: it is a distant view and the application proposals would serve to provide a unified foreground to the glimpsed houses in the Conservation Area beyond.
- The Inspector considering the appeal on the temporary accommodation for the Primary Academy noted (para 12) that: "character as a concept is influenced by more than appearance and is also a function of use and activity."

The Beckenham Society

There is no objection to rebuilding the secondary school but the addition of the primary school would constitute over-development of the site and would be severely detrimental to the Manor Way Conservation Area. The use of the existing school access for the primary school is potentially dangerous and wholly inappropriate. The Council's own statistics show no shortfall of primary school places in this area. If a shortfall exists elsewhere in the borough the provision of additional school places should be within reasonable walking distance of the area with a shortfall. Primary school children have to be hand over within the school grounds which makes it inevitable that cars will either park in the road or attempt to drive up an unsuitable access. This will cause congestion and is unacceptable in the conservation area.

At the time of writing 145 letters of support had been received. The following issues have been raised in respect of support:

- The area is clearly in need of more school places
- Proposals for the primary and secondary schools would be positive
- This Academy is long overdue new facilities, the existing buildings are outdated and not fit for purpose
- Pupils in the temporary buildings deserve a permanent building
- Any adverse effects of construction will be temporary
- A new primary school on the same site as an existing secondary school will enable shared facilities
- This is a sustainable location for increased school facilities
- The transport statements shows that this proposal would not have a significant traffic impact

- Any harm to residents doesn't outweigh the benefits of the scheme
- There is a primary school crisis in Bromley with many schools having bulge classes
- A school has been in this location for years, expansion is needed and appropriate
- Temporary facilities for a primary school exist on this site, this is a material consideration
- When granting the appeal for temporary facilities the Inspector concluded that there is an educational need, the development would not adversely affect the conservation area and there would be no significant harm to neighbouring residents. He considered expansion to be sustainable.
- The proposals would provide much improved facilities
- The secondary school has a smaller footprint than the current buildings
- This is a really good school
- Permanent buildings are needed to ensure that children attending the temporary school can continue their education here
- The transport assessment submitted shows that any impact can be mitigated
- An alternative location for a primary school would be less sustainable, it makes sense for the two schools to share facilities
- There are primary aged children living within walking distance of this school that would benefit from this going ahead
- The Inspectors appeal decision on the temporary facilities is a material consideration. He concluded that the development would not adversely affect the conservation area, there would be no material harm to occupiers of surrounding properties and there is a general need for primary school places in the Borough.
- The Inspector also concluded that intensification of existing sites, provided it can be achieved without harm is a more sustainable approach than providing new school sites
- Existing children in this area need to travel to school in other parts of the Borough so there is a need for a new school here

A petition in supporting of the proposal was submitted (83 signatures)

Additional comments received will be reported verbally to the committee.

Comments from Consultees

Thames Water: No objection subject to recommended Informatives

Environment Agency: No objection subject to recommended conditions

APCA: Accepting that this is a new school on an existing school site and despite the obvious increase in traffic the general principles are outside conservation area considerations.

Drainage: The submitted Drainage Impact Assessment carried by CampbellReith consulting engineers with Project No. 11866 dated February 2015 to provide 2 tanks to reduce surface water run-off to 45l/s for all events including the 1 in 100 plus 20% storm event is acceptable. The applicant is also considering the use of soakaways and that will be confirmed at the later stage, once soakage test is carried out to establish the suitability of the soil for infiltration. Please impose condition to comply with the submitted strategy.

Highways (summary – full comments incorporated into the analysis below): Although the school will have an impact on the junction and surrounding road network for a brief period; I am of the opinion the school will have a reduced impact than predicted within the Transport Assessment.

There is a need for the development to mitigate its impact by way of an s106 financial contribution. Due to the fact that the significant increase in pupil numbers on the site will give rise to an apparent increase in trip generation; there is a need to mitigate this impact of the development. The total cost of resurfacing Manor Way is £140,000 the proportion of the cost is attached to the development is £40,000 which is approximately less than a third of the total. Furthermore this road has been identified in Planned Highway Maintenance Programme 2015/16 report (dated

26/November/2014) as Priority 3 Highway maintenance location. This report recommends programmes of planned road and footway maintenance and provides schemes of work to be considered for future years. If minded to approve please secure the necessary s106 contribution and recommended conditions.

Environmental Health (initial comments): Noise: The report does not comment in depth on the possibility of noise from pupils affecting residential amenity and this has not been assessed. As this is a significant intensification of use there may be a noticeable increase in noise from children on break times etc., in particular if the primary school is also permitted. If this is a concern then the applicant should provide a further acoustic assessment to determine the current and likely future noise levels affecting surrounding residents, taking account of these sources. An assessment would allow the applicant to address this concern directly. Given the existing permitted use is as a school this may be considered acceptable. Reasonable internal noise levels in the proposed buildings can be achieved as outlined in the acoustic report. I do not agree with the proposed plant noise standards although as plant is currently unknown anyway this can be dealt with by of the recommended condition.

Contamination: The report finds low risk and further contamination measures are not considered necessary. Contamination issues should not be a bar to the proposed development however I would recommend an informative.

Air Quality: The air quality assessment finds that the impact of the development with appropriate mitigation will be insignificant although it highlights the potential for dust emission. The construction management plan does not go into detail on dust control and only states: *'Each construction activity will be risk assessed with regards to process and Kier procedures and where necessary proprietary equipment will be used to control activities where dust and debris may be produced during any activity.'* In order that we can see and approve measures to control dust, a condition is recommended.

I would also suggest a condition in respect of controlling the NOx emissions from gas boilers to minimise air quality impact within the AQMA.

Lighting: No floodlights or MUGA\sports pitch lights are proposed. It may be prudent to attach a condition for submission of details of access road car park and other lighting to prevent any impact on amenity.

Environmental Health (final comments): The additional information submitted in respect of noise, dust and air quality is acceptable. The recommended condition regarding plant noise should remain. The other aspects I am satisfied have been addressed and I would not object to the development.

Cleansing: No objection

Design & Conservation: The proposal site lies outside the Manor Way conservation area with only an access route from the conservation area. Therefore Policy BE13 for Development adjacent to a conservation area and BE11 are relevant. The most important views into and out of this conservation area are along Manor Way itself, and the gaps between the houses. Given how far this proposal is set back there will be no visual harm caused in this respect and indeed the proposed buildings are more attractive and rational than the current dated buildings on site. Any views of the development from back gardens would not in my view be harmful due to the large separation and screening.

In the appeal decision on 14/01636/FULL1 the inspector noted that the "function" of a site could be considered as a factor impacting upon the conservation area. However, the educational use on this site is an established part of the character of this area, although this proposal will add a primary school to the site. I note that there have not been any Highways objections in principle. Therefore I would expect that an increase in activity such as pedestrian or traffic movements within the conservation area could easily be handled and mitigated through the travel plan.

In conclusion I raise no conservation concerns and if minded to recommend permission I suggest that any boundary treatments are conditioned.

Tree Officer: Tree removals comprise the loss of 26 individual trees to facilitate the proposed scheme consisting 2 box elder, 2 mountain ash, 3 ash trees, 1 prunus, 1 maple, 1 oak tree , 1 field maple. 1 willow and 1 apple. Other trees are shown to be removed for arboricultural reasons distinct from the planning application proposal. The most significant of these are T83 Willow and T35 and T36 Ash of which are prominent within the site. The loss of T35 and T36 is required in order to upgrade internal vehicular access, with the removal of T83 required to enable the proposed building footprint for the new secondary school building and hardcourt area.

The loss of these trees is regrettable as they are high canopy and prominent when viewed from within the site, however on balance there is likely to be very little impact upon the streetscape, adjoining residential properties or local amenity, due to the presence of other existing trees close to the site boundaries, and I would therefore raise no objection subject to satisfactory mitigation.

The majority of trees are located mainly within the sites perimeter boundaries, and so unaffected by the proposal. Those trees which are within close proximity to the proposed construction are shown to be protected by way of ground protection, non-dig surface construction and fencing, based upon and in accordance with BS 5837: 2012 and described with Tree Protection Plan ref. JKK7990_figure 04.01 and JKK7990_figure 04.02. A new footpath is proposed to link the main pedestrian access and passing to the east of the upgraded parking arrangement. The line of the path will fall within and close to existing trees located within the protected areas adjacent to rear gardens within Manor Way. It is especially important that no-dig designs are implemented along this stretch of new hardstanding.

Tree losses based upon the above submitted details are in my opinion sustainable and can be mitigated. The remaining existing trees are to be retained in accordance with industry guidelines.

Subject to satisfactory drafting and implementation of Tree and Landscape condition I would recommend that no objection is raised.

Education Services: We would support application DC/15/00909 – Secondary and primary schools. This provides both the provision of new facilities for the secondary school replacing the current dilapidated buildings and sufficient accommodation for the primary school to operate as a 2FE school from reception through to year 6. Without the primary school being approved there will be insufficient primary school places in Beckenham in September 2016.

Although we would support the improvements to the secondary school set out in DC/15/00908 we are concerned about the implications of omitting the primary application for which there is a demonstrable need.

The GLA pupil planning projections demonstrate the need for Harris Beckenham Primary Academy.

The school is based in pupil place planning area 2 (Beckenham). Including Harris Beckenham there are currently 480 reception school places (September 2015) including the bulge class at Marian Vian School, this will reduce to 450 in subsequent years. The GLA projections indicate that demand for school places in planning area 2 will increase from 433 in 2015/16 to 443 in 2020/21. Based on the projections in planning area 6 including Harris Beckenham there would be 47 surplus places in 2015, falling to 7 surplus places in 2020/21. Without Harris Beckenham being able to provide 60 places we would have a deficit of 13 reception places in 2015/16 rising to 53 by 2020/21, the compound effect would be a shortfall of 233 primary places by 2021.

The Council has a policy to add 5% to GLA projections as part of its planning for school places to provide a contingency for changes in demand and to support diversity and choice. Including the

5%, without Harris Beckenham we would have a deficit of 35 reception places in pupil place planning area 3 in 2015/16 rising to 75 by 2020/21.

Without Harris Beckenham Primary Academy the local authority would not be able to meet its statutory requirement to provide sufficient local school places and every child an offer of a school place.

Planning Considerations

The application falls to be determined in accordance with the following Unitary Development Plan (UDP) policies:

T2 Assessment of Transport Effects
T3 Parking
T6 Pedestrians
T7 Cyclists
T15 Traffic Management
T18 Road Safety
BE1 Design of New Development
BE11 Conservation Areas
BE13 Development Adjacent to a Conservation Area
G8 Urban Open Space
C1 Community Facilities
C7 Educational and Pre School Facilities
NE7 Development and Trees

Bromley's Draft Local Plan: Policies and Designations Document has been subject to public consultation and is a material consideration (albeit it of limited weight at this stage). Of particular relevance to this application are policies:

Policy 6.5 Education
Policy 6.6 Education Facilities
Policy 7.1 Parking
Policy 7.2 Relieving congestion
Policy 7.3 Access to services for all
Policy 8.20 Urban Open Space
Policy 8.36 Conservation Areas
Policy 8.37 Development adjacent to a Conservation Area

In strategic terms the most relevant London Plan policies are:

Policy 3.18 Education Facilities
Policy 5.1 Climate Change Mitigation
Policy 5.2 Minimising Carbon Dioxide Emissions
Policy 5.3 Sustainable Design and Construction
Policy 5.5 Decentralised Energy Networks
Policy 5.6 Decentralised Energy in Development Proposals
Policy 5.7 Renewable Energy
Policy 5.11 Green Roofs and Development Site Environs
Policy 5.12 Flood Risk Management
Policy 5.13 Sustainable Drainage
Policy 6.3 Assessing effects of development on transport capacity
Policy 6.9 Cycling
Policy 6.10 Walking
Policy 6.11 Smoothing Traffic Flow and Tackling Congestion
Policy 6.13 Parking
Policy 7.1 Lifetime Neighbourhoods
Policy 7.2 An Inclusive Environment

Policy 7.4 Local Character
Policy 7.6 Architecture
Policy 7.8 Heritage Assets and Archaeology
Policy 7.14 Air Quality
Policy 7.15 Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and promoting Appropriate Soundscapes
Policy 7.19 Biodiversity and Access to Nature
Policy 7.21 Trees and Woodland

The National Planning Policy Framework 2012 (NPPF) is relevant, particularly paragraphs 72 (education) and 211 - 216 (status of adopted and emerging policies).

Planning History

The site has been the subject of numerous previous applications in respect of extensions and alterations to the school buildings.

The most relevant of which is 14/01636/FULL1 for “*erection of 3 temporary buildings to provide primary school accommodation for 2 forms in 2014/15 and 2 forms in 2015/16 plus staff support, together with associated hardstanding and landscaping works and 2 car parking spaces*”.

This application was refused by Planning Sub-Committee on 17th July 2014 for the following reason:

The proposed development would represent a cramped, over-intensive use of the site, giving rise to a detrimental impact on the character of the area, including the Manor Way Conservation Area, and on the amenities of nearby residential properties by way of increased traffic generation and parking pressure, not outweighed by local educational need, and thereby contrary to Policy BE1, BE13, C1, C7, T3 and T18 of the Unitary Development Plan.

The application was subsequently allowed on Appeal.

Whilst the appeal decision is a material planning consideration it is for an entirely different scale of development for a temporary period only, so will be given limited weight in the assessment of the current application. The fact that temporary facilities for the primary school are being provided does not mean that permanent facilities for 420 pupils will automatically be considered to be acceptable. This application will be assessed on its merits having regard to development plan policies and other material planning considerations such as third party representations.

DC/14/04290: Erection of 2 temporary buildings to provide primary school accommodation for 60 pupils plus staff until September 2016, together with associated hardstanding and landscaping works and 7 additional car parking spaces. Withdrawn by the Applicant after Appeal Granted for DC/14/01636.

Conclusions

The main issues to be considered are:

- Principle and Educational Need
- Impact on designated Urban Open Space
- Design and impact on the Conservation Area
- Landscaping
- Impact on trees and ecology
- Highways impact
- Impact on neighbouring amenity
- Sustainability
- Planning Obligations

Principle and Education Need

UDP Policy C7, London Plan Policy 3.18 and paragraph 72 of the National Planning Policy Framework set out requirements for the provision of new schools and school places.

The NPPF, para 72 states that

The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen the choice in education. They should

- give great weight to the need to create, expand or alter schools; and
- work with schools promoters to identify and resolve key planning issues before applications are submitted

In this regard pre application meetings were held outlining the planning issues affecting the site, the emerging Local Plan and the timescales for the Development Control and Local Plan processes.

The NPPF was preceded in Aug 2011 by a joint ministerial statement on planning and education from Eric Pickles and Michael Gove. It was not replaced by the NPPF and therefore remains a material consideration. It is strongly worded to ensure that the answer to proposals for the development of state-funded schools should be, wherever possible, “yes”.

London Plan Policy 3.18 encourages new and expanding school facilities particularly those which address the current predicted shortage of primary school places. Sections C&D are amended in the newly adopted March 2015 version to include new references to the projected shortage of secondary school places and the contribution of Free Schools and Additionally Section D indicates that, *proposals for new schools, should be given positive consideration and should only be refused where there are demonstrable negative local impacts which substantially outweigh the desirability of establishing a new school and which cannot be addressed through the appropriate use of planning conditions or obligations.*

UDP Policy C7 supports applications for new or extensions to existing schools provided they are located so as to maximise access by means other than the car.

As set out above there is planning policy support at local, regional and national level for the provision of education facilities within the current development plan. There is a clear commitment to extending/intensifying existing sites where possible. The proposal accords with the aims and objectives of national and local policy in this respect.

In addition it is appropriate to consider emerging policies. Draft Policy 6.5 of the emerging Local Plan defines existing school sites as 'Education Land.' Policies 6.5 and 6.6 of the Draft Local Plan support the delivery of education facilities unless there are demonstrably negative impacts which substantially outweigh the need for additional education provision, which cannot be addressed through planning conditions or obligations. In the first instance opportunities should be taken to maximise the use of existing Education Land. Paragraph 216 of the NPPF enables due weight to be given to emerging policies depending on their degree of consistency with the policies in the Framework. In this instance it is considered that there is significant compliance with existing policies and so greater weight can be given to the emerging policies. As a recently adopted policy, considerable weight can be given to the London Plan policy 3.18. This will be further addressed at the end of this report.

In addition to the importance placed on the need to meet the provision of school places by planning policies, it is necessary to consider the assessment of local provision of school places.

Need for Primary School Places

The need for primary school places is set out in the Council's review of the Primary School Development Plan and the update of "Planning for Growth – Review of Secondary Education". These were reported to the Education Policy Development and Scrutiny Committee (EPDS 27th January 2015) and approved by the Portfolio Holder for Education 29th Jan 2015. The main points related to Primary School Places are set out below.

When considering the requirements suggested by the school projections it is important to note the scope for statistical variation due to wider factors, such as cross borough migration, and the changing development forecasts.

For the school year 2014 applicants for reception class places exceeded forecasts by some 225 places, requiring an additional 8 'bulge classes'. Given the accompanying increases in pressure for "in year" admissions across school ages this suggests families arriving in the Borough. The primary school on this site is shown in the Primary School Development Plan to address the forecast demand. The additional bulge classes (granted on Appeal) the bulges were necessary to deal with additional unforecast demand.

The Council's review of the Primary School Development Plan (PSDP) shows pressures across the whole Borough (excepting Biggin Hill and Darwin). The PSDP review, which this year includes expansions at a further 5 primary schools, indicates the extent of the proposals necessary to address the pressures. The proposals suggest the provision of

- over 20 additional forms of entry (FE) through increased places at existing schools
- up to 10 additional FE from 5 new Free Schools, including Harris Shortlands, Harris Beckenham, La Fontaine, Crystal Palace Free School (all of which had approval from the Secretary of State for Education) and Langley Park Free School (which has subsequently been granted approval by the Secretary of State for Education)

The replacement secondary school is considered to be acceptable in principle as it would enable the existing school to reach its full capacity. It is considered that the need for additional primary school facilities has been demonstrated. Providing a primary school on this existing school site is considered to be appropriate as the proposal will not have a significant adverse impact on open space, trees, neighbouring amenity or highways. Furthermore the proposal would preserve the character and appearance of the conservation area.

Impact on the designated Urban Open Space (UOS) and Trees

Adopted UDP Policy G8 permits built development in Urban Open Space where

- i. it is related to the existing use..., or
- ii. ...is small scale and supports the outdoor recreational uses or children's play facilities on the site, or
- iii. any replacement buildings do not exceed the site coverage of existing development on the site,

Where built development is involved the Council will weigh any benefits to the community such against a proposed loss of open space.

In all cases, the scale, siting, and size of the proposal should not unduly impair the open nature of the site"

The draft Urban Open Space Policy 8.20 amends the last clause (as shown below) to increase the flexibility for school expansions on Urban Open Space sites

"Where there is a demonstrable need for additional education buildings sensitive siting will be sought to ensure that the impact on the open nature of the site is limited as far as possible without compromising the educational requirements. In all other cases, the scale, siting, and size of the proposal should not unduly impair the open nature of the site"

The proposal is related to the existing use in that it will replace an existing secondary school on the site and expands the existing educational use of the site by including primary school provision. The proposed buildings would be located largely on the area of site already occupied by buildings, away from the main area of the UOS. The existing buildings on site have a total footprint of 8,056 sqm, the proposal will significantly consolidate the building area footprint to 5,890 sqm maintaining a 20m zone free of development from most of the site boundaries (existing buildings adjacent to Little Acres will be retained within the 20m zone). Based on the details provided in the Design and Access Statement, there would be an increase in hard sports facilities (increase of 4,247 sqm) and access and parking areas (increase of 1,496 sqm) but a reduction in hard informal and social landscaped space and an increase in habitat areas and soft informal and social space.

Altogether hard landscaped space and building footprint combined would increase by 2,463 sqm. However, it is important to note that building footprint would reduce and the increase would be associated with ground cover from the MUGA and parking areas. Whilst there would be more ground cover, consolidating the buildings would result in less visual clutter. Consequently the proposal will have less building coverage than the existing which will improve the sense of openness of the site. The new buildings are located further away from the most sensitive eastern boundary of the site whilst not encroaching into the western section of the site which comprises open space with soft landscaped sports pitches. It is considered that the adverse impact on the UOS would be limited.

The additional car parking spaces will be located within an existing parking area albeit with some minor encroachment onto an area of soft landscape. However, this would not adversely affect the open character of the site.

The existing and emerging policies relating to UOS support the provision of new education facilities on UOS unless there are demonstrable negative local impacts. In this instance it is considered that the proposed development meets the requirements of the UOS policy.

Policy NE7 requires proposals for new development to take particular account of existing trees on the site and on adjoining land. It is recognized that a number of trees and groups of trees will be removed as part of the proposal. However a large number of trees will still be retained and a strong green buffer would still be present around the site boundaries, which will soften the impact of the development from neighbouring properties as well as providing good visual amenity for the school and opportunities for ecology. The Councils Tree Officer has confirmed that the loss of trees is acceptable.

The majority of trees are located mainly within the sites perimeter boundaries, and so unaffected by the proposal. Those trees which are within close proximity to the proposed construction are shown to be protected by way of ground protection, non-dig surface construction and fencing, based upon and in accordance with BS 5837: 2012 and described with Tree Protection Plan ref. JKK7990_figure 04.01 and JKK7990_figure 04.02. A new footpath is proposed to link the main pedestrian access and passing to the east of the upgraded parking arrangement. The line of the path will fall within and close to existing trees located within the protected areas adjacent to rear gardens within Manor Way. It is especially important that no-dig designs are implemented along this stretch of new hardstanding.

A landscape masterplan has been provided as part of the Design and Access Statement. Whilst this is considered to be acceptable to show the landscape concept for the site, it is not of sufficient detail to prevent the requirement for a further landscape submission which will be controlled by way of a condition. The detailed landscaping submission must include details of boundary treatments and ecological enhancement measures.

Ecology

Planning Authorities are required to assess the impact of a development proposal upon ecology, biodiversity and protected species. The presence of protected species is a material planning consideration. English Nature has issued Standing Advice to local planning authorities to assist

with the determination of planning applications in this respect as they have scaled back their ability to comment on individual applications. English Nature also act as the Licensing Authority in the event that following the issue of planning permission a license is required to undertake works which will affect protected species.

In this instance it is considered that appropriate surveys have been taken to enable the local planning authority to determine the application. The assessment undertaken by the applicant sets out the measures that would be required to protect any species that may be present on site.

The habitat survey submitted suggests a range of mitigation to prevent adverse impact to Bats and to enhance ecology at the site. It is considered appropriate to secure suggested measures through the use of conditions.

Design and impact on the Conservation Area

Design is a key consideration in the planning process. Good design is an important aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. The NPPF states that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.

The NPPF requires Local Planning Authorities to undertake a design critique of planning proposals to ensure that developments would function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development. Proposals must establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit; optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks. Developments are required to respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation. New development must create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and are visually attractive as a result of good architecture and appropriate landscaping.

London Plan and UDP policies further reinforce the principles of the NPPF setting out a clear rationale for high quality design. UDP Policy BE1 sets out a list of criteria which proposals will be expected to meet, the criteria is clearly aligned with the principles of the NPPF as set out above.

The school site lies adjacent to the Manor Way Conservation Area (and part of the access route falls within the boundary of the Conservation Area). Consequently the proposal must be considered against Policy BE11 of the UDP in terms of impact upon the conservation area. This policy requires development proposals to preserve or enhance the character and setting of the conservation area.

The proposed buildings have been designed with a simple form and structure. The mass of the blocks is broken up and the facades articulated with uniform and well-proportioned fenestration. The set back on the first and second floor levels in the centre of the block and use of different external cladding material for the ground floor of the secondary school block helps to articulate the proportions of the building further breaking up the mass. The scale and form of the buildings is appropriate for this location.

The materials palette is limited to the use of brick, render and aluminium fenestration and detailing. The same brick, fenestration and detailing will be used on the primary and secondary buildings to create a visual connection between the two structures whilst the use of the render on the secondary building will add interest to the palette. Large scale bay studies have been provided to show how the design will be executed in detail to ensure that a good quality can be achieved through the use of 150mm rendered reveals, rendered soffits and drip details on the rendered sections, full brick reveals on the brick elements, return ends on cills, internal soil and vent pipes and a simple uncluttered approach to the facades. The submission of such details enables officers

to have confidence in the execution of the design and to secure design quality as an integral part of the permission. Material samples have been provided thus negating the need for any pre commencement conditions in respect of materials.

Officers initially raised concerns with the extensive use of white render for the secondary school building in terms of appearance, quality and longevity as this material is prone to staining and weathering which can result in a very poor appearance in a relatively short timeframe. When using render it is necessary to ensure that the building has been appropriately detailed to reduce the number of external pipes, vents and ad hoc apertures in the façade as these all contribute to staining of the render. It is also necessary to consider the location of the building as render is not a robust choice of material for heavily trafficked locations. In response to the concerns raised the applicant has confirmed the specific manufacturer for the render providing technical specification, has designed the building with internal soil and vent pipes and has reduced the need for external vents and ad hoc apertures in the façade consequently limiting the potential of excessive staining and has provided detailed bay studies and sections to show the build quality. This location is not heavily trafficked and as the buildings are set back into the site they will not suffer excessive pollution or weathering. On balance, in this specific location render is considered to be an appropriate material that will complement the remaining materials pallet.

Over all the design approach is simple but fit for purpose and will result in a good quality development.

The buildings will be visible from surrounding residential properties but not within the streetscene and will not be readily visible in the conservation area. Consequently there will be no impact in design terms on the character or appearance of the conservation area. Third party concerns have been raised in respect of the increase in traffic, parking and servicing and noise generated by the proposal, it is suggested that this will detract from the character of the conservation area. This has been duly considered but Officers are not of the opinion that the intensification of educational use at this site will detract from the character of the conservation area. The proposal is considered to preserve the character and appearance of the conservation area.

Impact on highways and parking

The NPPF recognises that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, safe and suitable access to the site can be achieved for all people. It should be demonstrated that improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. The NPPF clearly states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

London Plan and UDP Policies encourage sustainable transport modes whilst recognising the need for appropriate parking provision. Policy T2 requires the submission of Transport Assessments for development likely to be significant generators of travel and Policy T3 with Appendix II sets out adopted car parking standards which should be used as a basis for assessment.

The applicant has submitted a Transport Assessment (TA) which sets out details of the highway, traffic and parking implications of the scheme. A further technical note was submitted to demonstrate the impact of the development on junctions within the vicinity of the site.

Proposed Operation

The first academic year of the primary school would cater for 60 reception class age students across two classes and a total of 11 members of staff. The number of pupils and subsequently the number of staff will increase year on year, from the first academic year up to a maximum size of 420 students and 48 members of staff for the 2021/2022 academic year. The full time equivalent

members of staff will be 32. This will therefore result in the school providing two-form entry from reception class to year 6 when it reaches capacity.

It is recognised that as the proposed primary school will be sharing its site with Harris Academy Secondary School there is likely to be some interaction between the two facilities. This would be managed in order to ensure the safety, particularly of the younger primary school age pupils who would be in attendance at the new school. The secondary school caters for pupils between the ages of 11-18 and includes academic years of Year 7 through to Year 13; the school includes sixth form facilities on-site. The school currently has in the region of 1000 students in attendance, however the authorised capacity of the secondary school is 1150 and following redevelopment it is anticipated that this level will be reached.

The secondary school currently operates school hours of an 8:30am start for all pupils with them needing to be on site by 08:25am. On Mondays and Fridays all pupils finish at 2:50pm, while on Tuesdays to Thursdays Years 7 and 8 finish at 2:50pm, but Years 9 – 13 finishes at 3:40pm. The school also runs a breakfast club, which begins at 8:00am. Teachers generally leave between 4:30-6:00pm. The school does not permit parents to drop-off or collect their children from within the school site; instead they are expected to do this from the surrounding local road network. In order to enforce this a member of staff is currently located at the school gates at the start and end of the school day to ensure parents do not drive onto the site without a prior appointment and also to ensure that pupils leave the school site safely. To further enforce this, the gate at the entrance to the school is closed at 8:10 am, to prevent parents from driving onto / off of the site

The primary school will cater for Reception class through to Year 6. It is currently envisaged that the school day will begin at 08:55 and finish at 15:15. The proposed start and finish times have been staggered from those in operation at the secondary school in order to minimise the impact of trips to and from the site on the local highway and transport networks. Furthermore the Breakfast Club will operate between 08:00 -08:55 and after school activities will take place between 15:15-18:00. This will help to spread the peak of arrivals and departures to the school site further lessening its impact on the local network.

On-Street Parking Surveys of Local Highway Network

The school proposes, that in line with current arrangements for the secondary school, parents bringing their children to the Harris Primary Free School Beckenham should not enter the school site, but instead undertake to drop-off and pick-up their children from the surrounding road network. To establish the available parking capacity that exists on the local network at present parking beat surveys were undertaken on Tuesday 4th February 2014 in line with the Lambeth Methodology, the extent of the surveys were discussed and agreed with the Council's Highways Department. Such methodology indicates that people are willing to park a distance of 200 metres from their intended destinations, as such parking beat surveys have been undertaken on roads within a 200 metre walking distance of the school.

The surveys were subsequently updated on Friday 6th February 2015. This means that there are two sets of survey data to compare against in order to provide a robust indication of existing parking stress on the local highway network when pupils are arriving and leaving the school site. Furthermore as the 2015 survey data was undertaken on a Friday all existing secondary pupils started and ended the school day at the same time which provides an even further robust assessment of the impact the primary school may have on local parking stress.

The surveys show parking on the local network for the peak hours of 08:00-09:00 and 14:30-15:30. This corresponds with the surveys in 2015 undertaken on a Friday when all pupils begin the day at 08:30 and finish the day at 14:50. These two peak hours therefore represent when at present most demand for on street parking associated with parents dropping-off and picking-up their children from the school would occur. The 2015 survey analysis shows higher levels of existing parking demand, with average peak demand in the AM Peak period of 23% compared to 15% in 2014 and 32% in the PM Peak period compared to 28% in 2014.

Comparative Dwell Time Surveys

The Council's Highways Department requested that dwell time surveys be undertaken at a comparable local primary school to determine the length of time parents spent parked on local roads while taking and collecting their children from school.

Surveys were undertaken at Harris Primary Academy, Benson on 4th February 2014. The dwell time surveys have indicated that during the morning peak hour the average dwell time for cars on the local network is just over 10 minutes while in the afternoon peak hours the average is almost double at approximately 20 minutes. This is often due to the fact that parents will arrive prior to the end of the school day to ensure they are ready for when their child leaves. Moreover parents are often more likely to undertake meetings with teachers or other parents at the end of the school day rather than the beginning. The average dwell times were recorded as 4 minutes and 8 seconds for the AM Peak and 16 minutes and 31 seconds for the PM Peak.

Staff Travel to Work

The table below shows the modal splits from staff surveys undertaken for the existing secondary school.

Mode of Travel	Mode Share (%)
Walk	16%
Cycle	3%
Bus	3.3%
Rail	11.3%
Car Driver	58%
Car passenger	3%
Other	5.4%
Total	100%

The Primary School will be located on the same site; therefore the applicant assumed that staff travel patterns will be similar.

Car Parking Arrangements

The Primary School is proposing to provide a total of 22 car parking spaces for the exclusive use of Primary School members of staff and visitors to the front of the school.

The new Secondary School building will have a total of 75 parking spaces provided alongside the facilities. The total number of staff employed at the new Secondary School will be 125. Applying the same car modal share of 58%, equates to a requirement of 73 spaces for members of staff. This means that there will be two parking spaces left over for the use of visitors. Four of the Secondary School parking spaces will be provided to disabled standards.

School Drop-Off and Pick-Up Arrangements

Parents will not be able to drive into the school site to drop-off or collect their children. Pick-up and drop-offs will take place from the local road network, similar to existing arrangements for the secondary school.

The applicant was asked to consider the potential for on-site drop-off / pick-up arrangements for primary school pupils to be incorporated within the scheme. The applicant has investigated this and stated that there are significant concerns over the safety of mixing pupils and cars during drop-off and pick-up times. At a peak time there could be a total of 1,570 pupils on site and given the constrained nature of the site it would be inevitable that if drop-offs and pick-ups were to need to occur on site there would be a number of occasions where both pupils and drivers were looking to occupy the same space. For this reason the applicant has decided to adopt the same arrangements as the secondary school.

School Access Arrangements

It is proposed that both schools will be accessed from the existing access point onto Manor Way. Improvements will be made to pedestrian provision on the access road into the site from Manor Way. The applicant has concluded that access to the school site via Kelsey Lane would not be an appropriate solution for the provision of access for pedestrians or vehicles as there is insufficient land available for the provision of a suitable vehicular and pedestrian access and it is anticipated that such a provision could have a detrimental impact on highway safety.

The existing school access via Manor Way provides for both pedestrians and vehicles and there is a pedestrian refuge island located immediately to the south of the access and adjacent to the bus stops located on Stone Park Avenue, assisting with the safe movement of children across this road. Also, all the school signage is already in place, therefore removing the requirement for any new off-site highway infrastructure to accommodate the new primary school. Furthermore, as the existing and proposed school buildings are located on the eastern side of the site, Manor Way provides the shortest route from the public highway to the school buildings, thereby minimising dwell times of parents undertaking drop-offs / pick-ups by car and therefore minimising any impacts on on-street car parking.

To utilise an alternative access would result in a longer walking distance for pupils to the school building and in turn would likely result in increased vehicle dwell times during school drop-off and pick-up periods aggravating impacts on the surrounding highway network. Therefore on balance Manor Way provides the viable means of vehicular / pedestrian access to the existing secondary school and proposed primary school.

Trip Generation

In order to establish the proportion of pupils who would be likely to take part in additional activities beyond normal school operation, data was obtained from three of the Harris Federations existing primary schools in the local area namely; Crystal Palace, Kent House and Benson Primary Free Schools.

The average proportions of pupils using such facilities is presented in table below

	Crystal Palace	Kent House	Benson	Average
Total Number of Pupils	338	420	420	
Before / After School Club Average Attendance	29	36	16	7%

It's suggested that 7% of pupils are likely to use such facilities and therefore arrive and leave the school site outside of the peak hours of 08:00-09:00 and 15:00-16:00 respectively. Therefore in relation to the proposed school size of 420 pupils, 30 of these would travel outside the peak hours.

In order to establish the modal shares the remaining 390 pupils would use to travel to the school site during the peak hours, use has been made of school mode share surveys undertaken at a number of primary schools in Bromley.

Method of Travel	Mode Share	Total Trips
Walk	51%	199
Cycle / Scooter	2%	8
Car / Van	43%	168
Bus	4%	16
TOTAL	100%	390

The table shows that of the 390 pupils that would arrive and depart during the peak hours, the majority (51%) of pupils would be expected to walk to the school site. After this approximately 43%

of pupils would be expected to travel by car to school. Fewer than 25 pupils combined would be expected to either cycle/scooter or use public transport to travel.

Staff Trip Generation

In respect of the primary school, the modal split of the 48 members of staff travelling to the school site has been identified using data from the March 2014 surveys undertaken at Harris Academy Secondary School. This covers all staff employed at the site.

Mode of Travel	Staff Split	All Staff Trips (48 Staff)	FTE Staff Trips (32 Staff)
Walk	16%	8	5
Cycle	3%	1	1
Bus	3.3%	2	1
Rail	11.3%	5	4
Car Driver	58%	28	19
Car Passenger	3%	1	1
Other	5.4%	3	2
Total	100%	48	32

There would likely be a maximum of 32 FTE members of staff on site. Therefore the table shows that during these peak hours, 19 would be expected to travel to the school site by car and 1 by bicycle.

Trip Distribution and Development Impact

A junction capacity assessment has been undertaken on the local highway network in line with the request from the Council's Highways Department.

In the tables below **RFC** = Reserve Flow Capacity (usually below 0.85 means that the junction is operating satisfactory) **Q** = queue - indicates number of vehicles waiting at the junction.

Manor Way / Kelsey Way Priority Junction

Link	2014 Observed				2021 Baseline				2021 With Development			
	AM Peak 8:00- 9:00		PM Peak 15:00- 16:00		AM Peak 8:00- 9:00		PM Peak 15:00- 16:00		AM Peak 8:00- 9:00		PM Peak 15:00- 16:00	
	RFC	Q Veh	RFC	Q Veh	RFC	Q Veh	RFC	Q Veh	RFC	Q Veh	RFC	Q Veh
Manor Way (Right Turn)	0	0	0.01	0	0.0	0	0.0	0	0	0	0.0	0
Kelsey Way	0.04	0	0.04	0	0.0	0	0.0	0	0.0	0	0.0	0

The Manor Way / Kelsey Way Priority Junction – data indicates that the junction has enough capacity to cater for the additional traffic.

Manor Way / School Access Priority Junction

Link	2014 Observed				2021 Baseline				2021 With Development			
	AM Peak 8:00- 9:00		PM Peak 15:00- 16:00		AM Peak 8:00- 9:00		PM Peak 15:00- 16:00		AM Peak 8:00- 9:00		PM Peak 15:00- 16:00	
	RFC	Q Veh	RFC	Q Veh	RF C	Q Veh	RF C	Q Veh	RF C	Q Veh	RF C	Q Veh
Manor Way (Right Turn)	0.01	0	0.0	0	0.0 1	0	0.0	0	0.0 3	0	0.0	0
Kelsey Way	0.01	0	0.02	0	0.0 1	0	0.0 3	0	0.0 1	0.	0.1 0	0

The above show that the Manor Way / School Access junction currently operates with spare capacity and would continue to do so when allowing for development.

Manor Way / Stone Park Avenue Priority Junction

Link	2014 Observed				2021 Baseline				2021 With Development			
	AM Peak 8:00- 9:00		PM Peak 15:00- 16:00		AM Peak 8:00- 9:00		PM Peak 15:00- 16:00		AM Peak 8:00- 9:00		PM Peak 15:00- 16:00	
	RFC	Q Veh	RFC	Q Veh	RFC	Q Veh	RFC	Q Veh	RFC	Q Veh	RFC	Q Veh
Stone Park Ave East (Right Turn)	0.1 8	0	0.1 3	0	0.3 1	1	0.2 5	0	0.3 4	1	0.2 6	0
Manor Way (South)	0.0 2	0	0	0	0.0 3	0	0	0	0.0 3	0	0.0	0
Stone Park Ave West (Right Turn)	0	0	0	0	0	0	0	0	0	0	0	0
Manor Way (North)	0	0	0.2 5	0	0.6 7	2	0.5 9	1	1.3 0	25	1.0 9	15

In the 2021 baseline scenario the RFC on Manor Way North will increase significantly in both the morning and afternoon peak hours. The 2021 baseline scenario assumes that the secondary school is operating at capacity and therefore an additional 150 pupils will be travelling to the school site as well as 25 additional staff. The additional movements of parents to and from Manor Way gives rise to increased RFC's on Manor Way (North).

The result of additional development traffic associated with the new primary school will be increases in queuing on the Manor Way North arm only. This relates to 43% of 390 pupils being dropped off by their parents during the peak hour on Manor Way and 58% of 32 FTE members of staff arriving and departing the school site during peak hours.

During the AM Peak hour, PICADY (a computer software program package for designing and modelling priority junctions such as roundabouts and crossroads) shows that the RFC on the Manor Way North arm would only be above 1.0 for a half hour period between 08:15-08:45, whilst

outside of this period the RFC falls back to approximately 0.7, in line with the modelling shown for the 2021 Baseline peak period. Similarly during the PM Peak hour the RFC's on the arm are also only above 1.0 for a half hour period between 15:15 – 15:45, whereas outside of this period the RFC again reduces to similar levels experienced in the 2021 Baseline scenario peaks.

Conclusions

The surveys have been prepared based on the assumption that all pupils at the primary school arrive between 08:00-09:00 and leave between 14:30-15:30 apart from 7% of students who would likely be taking part in before and after school activities. Furthermore the analysis assumes that all trips are new to the network and there will be no shared trips between primary and secondary school children. It also assumes that all pupils arriving / departing by car are travelling in separate vehicles.

Assessment Period	15 Minute Segment	Total On-Street Parking Available (Cars)	Maximum Existing Cars Parked	Total Parking Demand Primary School (168 Vehicles) and Residual Secondary School (65 Vehicles)	Average Dwell Time	Maximum Demand for spaces at any one time	Spaces Available	Parking Stress
8:00-9:00	8:00-8:15	233	46	233	10 mins 15 Secs	40	147	37%
	8:15-8:30	233	56	233	10 mins 15 Secs	40	137	41%
	08:30-08:45	23	53	233	10 mins 15 Secs	40	140	40%
	8:45-9:00	233	55	233	10 mins 15 Secs	40	138	41%
14:30-15:30	14:30-14:45	233	67	233	20 mins 14 Secs	79	87	63%
	14:45-15:00	233	79	233	20 mins 14 Secs	79	75	68%
	15:00-15:15	233	83	233	20 mins 14 Secs	79	71	69%
	15:15-15:30	233	64	233	20 mins 14 Secs	79	90	61%

The table shows that the on-street parking demand that is likely to be generated by parents escorting their children to and from the School and the shortfall in pupils currently at the secondary school, the parking stress as a maximum could increase to 41% during the morning peak hour and 69% for the afternoon peak, which accounts for the longer dwell times expected in the PM Peak. It can be concluded that there is sufficient on-street parking capacity to accommodate the primary school and the secondary school when operating at full capacity.

The combined operation of primary school and secondary school would have an impact on the junction of Manor Way / Stone Park Avenue. There will be increases in queuing along Manor Way compared to the baseline scenario; however, this impact is anticipated to last for a short period of time whilst pick-up and drop-off movements are occurring. Furthermore it does not impact on the operation of Stone Park Avenue which is a key corridor for east – west movements in the local area. Furthermore parking beat surveys have indicated that sufficient capacity exists on local roads to accommodate increased pick-up and drop-off trips.

The junction will operate within capacity in 2021 without the primary school provision; however, there would be short term increases in RFC and associated queues on Manor Way (north) following the introduction of the primary school. With the addition of the primary school and with the secondary school at maximum capacity, the RFC on Manor Way (north) will increase significantly in both the morning and afternoon peak hours. There would be an increase in RFC to 1.30 in the morning peak, and 1.09 in the school afternoon peak, with queues of 25 and 15 respectively, increasing from 2 and 1 without the school. It should be noted that there will be minimal or no increase in RFC or queues on any of the other arms.

The TA identified that the RFC was above 1.0 during a peak 30 minute period within the peak hours only, being 08.15 – 08.45 and 15.15 – 15.45. Outside of these two 30 minute periods per day, the junction operated within capacity. With regard to the afternoon peak, this is outside of the existing highway peak, and therefore some of the flows at this junction are considered to be associated with the Harris Academy, which finishes between 14.50 and 15.40 for various Year groups, rather than residents of Manor Way.

It should be noted whilst PICADY provides a good guide when comparing the relative impact of one set of flow scenarios to another, the impact it concludes when a junction is anticipated to operate above capacity is not a factual representation of how the junction would operate in reality. In particular queues increase exponentially in PICADY when the RFC goes above 1.0 and therefore the level of queuing the modelling results show would not be expected to be borne out to such an extent in reality.

It should also be noted that the assessments include for the provision of an additional 150 pupils and 25 staff that can be accommodated at the existing Harris Academy without any new planning permission, and therefore an element of the increase in RFC's / queues could be attributed to this increase.

It is however likely there will be some impact as the primary cause of congestion is parents wanting to drive as close as possible to the school entrance (during the morning drop off) some may double park and create congestion, regardless of available parking within walking distance of the school. When considering the distribution of pupils arriving / departing from the school, the assessment assumes that the route the parents take to / from the school on each trip is the same and is based on the nodal point catchment areas for the pupils. In reality, many of the parents will be travelling to other destinations once they have dropped their children at / picked their children up from school and therefore their access routes will vary. This could result in fewer trips travelling through the Manor Place Depot / Stone Park Avenue junction than currently predicted and / or with different directions of travel at the junction.

The School Travel Plan would be used and will evolve over the lifetime of the schools to promote and support a range of measures to encourage parents and their children to travel to the school site by sustainable means.

The trip generations assessments do not allow for car sharing by pupils, with all trips by car being considered as a single pupil trip. It is clear that the school will have a number of pupils that are siblings of other pupils at the school, and also potential siblings of pupils attending the Harris Academy. Previous experience with schools has demonstrated that up to 30% of pupils are siblings, and these are likely to car share to the school, reducing the number of trips. The assessment also does not include for car sharing arranged by parents for their children that live close to each other.

The primary school is proposing to provide a total of 22 car parking spaces and a minimum of five staff cycle parking spaces and 42 pupil scooter / cycle parking spaces. These will be monitored as part of the School Travel Plan to determine demand for their use and additional requirement if necessary. Similarly the Secondary School will increase its parking provision from 50 spaces to 75 spaces to ensure the needs of all staff can be accommodated on site.

Although the school will have an impact on the junction and surrounding road network for a brief period; the Council's Highways Officer is of the opinion the school will have a reduced impact than that predicted within the Transport Assessment. On balance, the proposal is considered to be acceptable from a highway perspective. However, due to the fact that the significant increase in pupil numbers on the site will give rise to an apparent increase in trip generation there is a need to mitigate this impact of the development by way of a financial contribution towards highway maintenance for Manor Way. The total cost of resurfacing Manor Way is £140,000 the proportion of the cost is attached to the development is £40000 which is approximately less than a third of the total. Furthermore this road has been identified in Planned Highway Maintenance Programme 2015/16 report (dated 26/November/2014) as Priority 3 Highway maintenance location. This report recommends programmes of planned road and footway maintenance and provides schemes of work to be considered for future years.

In summary the Council's Highways Officer is of the view that the proposal would have some impact in terms of traffic generation but this could be mitigated through the use of a Travel Plan and contribution towards highway improvements. It is not considered that a refusal on the ground of traffic generation or highways impact could be sustained. The NPPF clearly states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. In this instance the traffic impact of the scheme can be adequately mitigated in accordance with UDP Policy T2 and impact on parking is considered to be acceptable in accordance with Policy T3. Consequently the proposal is considered to be acceptable from a highways perspective.

Impact on neighbouring amenity

Policy BE1 of the UDP seeks to protect existing residential occupiers from inappropriate development. Issues to consider are the impact of a development proposal upon neighbouring properties by way of overshadowing, loss of light, overbearing impact, overlooking, loss of privacy and general noise and disturbance.

The concerns raised by neighbours in respect of the impact on their amenity by way of overlooking, loss of privacy, noise and disturbance have been duly considered in the balanced assessment of this application. When considering the impact of the proposal in this respect it is necessary to acknowledge that a school already exists on this site, the existing school comprises substantial buildings, car parking located between the buildings and the properties in Manor Way, the same access route as currently proposed and extensive areas of hard and soft landscape. Consequently there is already a degree of noise and activity associated with the use of the this site in its current form whereby pupils and teachers have access to the site in its entirety including the ability to utilise soft landscaped areas up to the adjoining boundaries with neighbouring properties. It is therefore necessary to consider whether the proposal would give rise to an increase in noise, activity, overlooking and loss of privacy and whether that increase would amount to significant harm so as to warrant refusal of this application.

An important consideration is the relationship of the new development to neighbouring properties. Taking the closest measurements based on the nearest residential property to the shared boundaries, the new primary school would be located 24m from the boundary with Kelsey Way at its nearest point (single storey element) with the two storey element being located 30m from the boundary, there would be a distance of over 150m between the new school buildings and the boundary with properties in Village Way, 20m between the primary school and Nos.1-4 Little Acre, the new secondary school would be located over 100m from the boundary with properties in Manor Way although it is recognized that the MUGA will be located closer at 40m and the parking area (15m) with a new path providing pedestrian access from the entrance road to the buildings

located at the southern end of the site incorporated into the landscaping scheme located 5m from the boundary of the rear gardens in Manor Way. It is also important to note that the properties adjoining this site benefit from generous rear gardens ranging between 20-40m in depth resulting in a significant distance between the rear elevations of residential dwellings and the proposed primary and secondary school buildings.

It is considered that sufficient distances would be retained between the new buildings and the rear elevations of neighbouring properties to prevent any adverse impact in terms of over shadowing, loss of light or light pollution. Furthermore it is not considered that any overlooking or loss of privacy that could occur in terms of residential gardens or windows would be so detrimental as to warrant refusal of this application given the generous distances that would be retained.

The MUGA, parking areas and new path will generate activity and noise. Pupils will utilize the path introducing more activity closer to the boundary with the rear gardens of properties in Manor Way. The path is required to provide pedestrian access to the school buildings without needing to walk through the car park. It is not considered that the parking area or new footpath would generate an unacceptable level of activity, noise and disturbance. There is already the potential for staff and pupils to utilise this area of the site should they choose to do so and any increase would be unlikely to cause significant harm to amenity.

It is important to note that the application does not include any flood lighting for the MUGA as it is not intended to use this facility in the evening. Whilst the school buildings will be available for community use until 22:00 on weekdays it is not considered appropriate to allow the MUGA to be used until this time. The acoustic assessment suggests that the external areas within the site should not be used for prolonged periods and therefore it is appropriate to attach a condition preventing use of the MUGA after 18:00 on any day. If flood lighting is sought in the future this would require a separate planning permission which would be assessed on its own merits and may not be granted. This issue has been raised with the applicant and they are fully aware that approving a MUGA as part of this application is entirely without prejudice to the assessment of any future proposal for flood lighting.

It is recognized that the addition of a primary school will result in a significant increase in pupils and teachers using the site. This will give rise to an increase in activity and noise as a result of drop offs, pick-ups and day to day operation. The increase in people using this site and the activities associated with the operation of the primary school will be noticeable from neighbouring properties, which cannot be avoided. However, it is not considered that this increase would give rise to unacceptable disturbance that would result in significant harm to neighbouring amenity, given the size of the site, its relationship to neighbouring properties, the fact that the noise and activity will be largely limited to daytime hours (albeit with some community use of the buildings in the evenings) and having regard to the existing and long established use of the site for educational purposes.

This application was supported by an acoustic assessment and addendum which calculated the potential increase in noise arising from the intensification of the use, the report concludes that there would not be an unacceptable noise impact. This report has been scrutinized by the Council's Environmental Health Officer and its conclusions are considered to be robust.

It is recognised that during implementation of the planning permission there could be an increase in noise and disturbance from construction related activity including vehicular traffic. Operational traffic has been discussed above and the impact has been deemed to be acceptable. Construction related noise and activity cannot be avoided when implementing a development of this nature and scale. This is a relatively short term impact that can be managed as much as practically possible through measures such as a Construction Management Plan (CMP) and control of construction hours. Construction related disturbance would be short term and it is not considered appropriate or reasonable to raise an objection to the proposal on the grounds of harm to neighbouring amenity from construction related activity.

Concerns regarding dust pollution have been duly considered. The applicant has submitted a Dust Management Plan which has been assessed by Environmental Health Officers and deemed to be acceptable.

Taking all of the above into account it is considered that whilst there will be additional activity relating from the intensification of this school site the proposal is not considered to have a significantly harmful impact on the amenities of nearby residents and therefore the proposal is considered to be acceptable in this respect.

Sustainability

The NPPF requires Local Planning Authorities to adopt proactive strategies to mitigate and adapt to climate change. London Plan and Draft Local Plan Policies advocate the need for sustainable development. All new development should address climate change and reduce carbon emissions. For major development proposals there are a number of London Plan requirements in respect of energy assessments, reduction of carbon emissions, sustainable design and construction, decentralised and renewable energy. Major developments are expected to prepare an energy strategy based upon the Mayors energy hierarchy adopting lean, clean, green principles.

The applicants Energy Strategy was originally considered to be insufficient in terms of its content and conclusions. This issue was raised with the applicant and a further note was submitted.

The development does not comply with the London Plan requirements as the overall CO₂ reduction for the secondary school building would be significantly less than the 35% required by Policy 5.2 of the London Plan (24%). The applicant was asked to address this matter further but has been unable to increase the CO₂ reduction for the secondary school which they attribute to the fact that there is limited roof space available for PV panels. This is extremely regrettable particularly as the development also fails to provide any living roofs which is contrary to London Plan Policy 5.11 which requires major development proposal to incorporate living roofs and walls where possible. It is possible for PV panels to be positioned on top of living roofs. Indeed the provision of living roofs below photo-voltaic panels optimises the efficiency of the PVs bringing additional sustainability benefits to the development. It is considered that the lack of a living roof is a missed opportunity to make a positive contribution in terms of SUDs, ecological benefits and visual amenity.

However, on balance taking account of the benefits of the scheme in meeting a demonstrable demand for education provision in the borough, Officers do not consider that a reason for refusal on the grounds of sustainability could be justified. However, it is necessary to ensure that 35% for the primary school and 24% for the secondary school CO₂ reduction is secured by way of a condition to ensure that the development makes maximum provision towards addressing sustainability policies.

Other Considerations

Drainage, air quality and land contamination has been addressed by way of submission of technical reports which have been scrutinised by relevant consultees. Appropriate conditions are recommended in most respects.

Planning Obligations

The National Planning Policy Framework (NPPF) states that in dealing with planning applications, local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. It further states that where obligations are being sought or revised, local planning authorities should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled. The NPPF also sets out that planning obligations should only be secured when they meet the following three tests:

- (a) Necessary to make the development acceptable
- (b) Directly related to the development; and
- (c) Fairly and reasonably related in scale and kind to the development

Paragraph 122 of the Community Infrastructure Levy Regulations (April 2010) puts the above three tests on a statutory basis. From 5th April 2015, the Council will need to link Education, Health and similar proposals to specific projects in the Borough.

In this instance in order to make the development acceptable in planning terms the following obligations are considered to be necessary:-

- A financial contribution towards the highway improvements (£40,000)
- Reimbursement of the Councils legal costs associated with the drafting, finalising and monitoring the agreement.

The applicant has agreed to enter into a s106 agreement to secure the above obligations.

Environmental Impact Assessment

A formal screening opinion was issued under Regulation 5 on 10 April 2015 confirming that the development is not EIA development.

Summary

The proposed development of the site raises issues associated with intensifying educational use of the site and the acceptability of the development in terms of its nature and scale, impact on the local environment and surrounding area. This report has considered those matters in the light of adopted and emerging development plan policies and other material considerations including third party representations.

As discussed in this report the redevelopment of this site in the nature proposed is considered to be a suitable form of development. The proposal would provide additional education facilities for the borough on an existing education site which meets the aims and objectives of national, regional and local policy, the proposal would have an acceptable impact on the designated Urban Open Space and would preserve the character and appearance of the conservation area.

It is considered that the transport impacts arising can be adequately mitigated through the use of a travel plan and financial contribution towards road improvements.

Officers consider that, with the recommended mitigation, planning conditions and obligations in place the proposal represents an appropriate form of development that would not give rise to unacceptable harm to amenity and save for the lack of living roofs and proposed reduction in CO₂ emissions would largely meet development plan policy requirements.

Consequently it is considered that the proposal is acceptable subject to recommended conditions.

Background papers referred to during the production of this report comprise all correspondence on file ref 15/0909, excluding exempt information.

RECOMMENDATION: PERMISSION Subject to a S106 legal agreement and the following conditions:

1. A01 Commencement of Development
A01 Reason – 3 years
2. The temporary accommodation for the secondary school hereby approved shall be removed and the land restored to a condition as set out in the plans hereby approved on or before 31st December 2017.

Reason: In accordance with the application details as submitted and in order to ensure that the additional buildings are removed once the permanent school is available for occupation in the interests of restricting the amount of development on site and protecting the character and amenity of the area in accordance with Policy BE1 of the UDP (2006)

3. NS - The development hereby approved shall be carried out strictly in accordance with the application plans, drawings and documents as detailed below:
Plans Nos. 688-HABE-PL-002-00, 003-00, 004-00, 014-00, 015-00, 016-00, 017-00, 018-00, 019-00; 020-00, 021-00; 022-00, 023-00, 024-00, 688-HPFSB-PL-008-00 and 009-00; Kier Construction Management Plan, Air Quality Assessment, RPS Transport Assessment, Campbell Reith Drainage Impact Assessment, Van Zyl & De Villiers Ltd Energy Strategy, RPS Phase 1 Preliminary Risk Assessment and Phase 2 Environmental and Geotechnical Site Investigation Report, RPS Arboricultural Method Statement, RPS Updated Ecological Appraisal, Design and Access Statement Received 04 March 2015;
Plan Nos. 688-HABE-PL-001-00, 005-00, 006--0, 007-00, 008-00, 009-00, 010-00, 011-00, 012-00, 013-00, 019-00; 688-HPFSB-PL-001-00, 002-00, 003-00, 004-00, 005-00, 006-00, 007-00, 010-00, 011-00, D2279_P_L.100 and L.200 Received 10 March 2015;
Plan No. 688-HABE-PL-025-01 Received 07 April 2015;
RPS Technical Note: Junction Impact Review Received 20 April 2015 and Kier Dust Management Plan Received 27 April 2015

Reason: To ensure that the development is carried out in accordance with the approved documents, plans and drawings submitted with the application and is acceptable to the local planning authority when judged against development plan policies in the London Plan 2015 and UDP 2006.

4. NS – (i) No demolition shall take place nor works to trees by way of felling or pruning until a survey has been carried out to ascertain the extent to which there is potential for roosting bats or nesting birds within the buildings, trees and hedgerows on site. If any potential is identified, details shall be submitted to and approved in writing by the local planning authority of the timing of the works and any necessary mitigation measures.
(ii) The works shall be carried out in full accordance with the approved timing and mitigation measures.
(iii) If any potential for roosting bats or nesting birds is identified works to trees and hedgerows shall only be undertaken between the months of November to February inclusive thus avoiding the potential to harm protected species.

Reason: In order to comply with Policy NE3 of the Unitary Development Plan and in order to safeguard the interests and well-being of bats and birds on the site which are specifically protected by the Wildlife and Countryside Act 1981 (as amended)

5. NS – (i) Above ground construction of the new buildings hereby approved shall not commence until a surface water drainage scheme for the site based on sustainable drainage principles, and an assessment of the hydrological and hydro geological context of the development has been submitted to, and approved by, the Local Planning Authority. The surface water drainage strategy should seek to implement a SUDS hierarchy that achieves reductions in surface water run-off rates to Greenfield rates in line with the Preferred Standard of the Mayor's London Plan.

(ii) The development insofar as it relates to each school building shall be implemented in full accordance with the details approved under Part (i) prior to any part of the relevant school building being brought into use.

Reason: To reduce the impact of flooding both to and from the proposed development and third parties in accordance with Policies 5.12 Flood Risk Management and 5.13 Sustainable Drainage of the London Plan (2015)

6. NS - (i) A detailed scheme of landscaping which shall include
- Details of bird and bat boxes
 - Details of log piles
 - Details of ecological improvements to the existing pond
 - Details and samples of any hard surfaces (NB: No loose materials shall be used for surfacing of the parking and turning area hereby permitted)
 - Full details of boundary treatments
 - Proposed plant numbers, species, location and size of trees and tree pits,
 - Furniture and lighting
 - Details of the management and maintenance of the landscaping for a period of five years

shall be submitted to and approved in writing by the local planning authority prior to construction of any above ground works.

(ii) The approved landscaping scheme shall be implemented in full and all planting, seeding or turfing shall be carried out in the first planting and seeding seasons following the completion of the new buildings hereby approved, in accordance with the approved scheme under part (i). Any trees or plants which within a period of five years from the completion of the development die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species.

Reason: In order that the local planning authority may be satisfied as to the details of the proposal and to comply with Policies BE1, BE7, NE3, NE5 and NE7 of the UDP.

7. NS - Whilst the principles and installation of sustainable drainage schemes are to be encouraged, no infiltration of surface water drainage into the ground is permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approved details.

Reason: Infiltrating water has the potential to cause remobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of groundwater. Consequently it is necessary to prevent harm to human health and pollution of the environment in accordance with Policy ER7 of the Unitary Development Plan.

8. NS - Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: Piling or other penetrative methods of foundation design on contaminated sites can potentially result in unacceptable risks to underlying groundwaters. Where soil contamination is present, a risk assessment should be carried out in accordance with our Environment Agency guidance 'Piling into Contaminated Sites'. Piling is not permitted on parts of a site where an unacceptable risk is posed to controlled waters in accordance with Policy ER7 of the Unitary Development Plan.

9. The development shall be carried out in full accordance with the Construction Management and Dust Management Plans hereby approved.

Reason: In order that the local planning authority may be satisfied that the demolition and construction process is carried out in a manner which will minimise possible noise, disturbance and pollution to neighbouring properties and to ensure satisfactory vehicle

management in accordance with Policies BE1 T5, T6, T7, T15, T16 & T18 of the Unitary Development Plan.

10. NS – The development hereby approved shall be carried out in strict accordance with the materials as submitted with this application. Namely Sto Silco 1.5mm white render, Kaweneer Aluminium AA0541 Fenestration (RAL 7016 Satin) and Ibstock Brunswick Buff Bricks.

Reason: In order to comply with Policy BE1 of the Unitary Development Plan and in the interest of the appearance of the building and the visual amenities of the area.

11. NS - Prior to the new buildings hereby permitted being brought into use all parking and turning spaces hereby approved shall be completed in accordance with the approved details and thereafter shall be kept available at all times for such use and no permitted development whether permitted by the Town and Country Planning (General Permitted Development Order 1995 (or any Order amending, revoking and re-enacting this Order) or not shall be carried out on the land or garages indicated or in such a position as to preclude vehicular access to the said land or garages.

Reason: In order to comply with Policy T3 of the Unitary Development Plan and to avoid development without adequate parking or garage provision, which is likely to lead to parking inconvenient to other road users and would be detrimental to amenities and prejudicial to road safety.

12. While the development hereby permitted is being carried out a suitable hardstanding shall be provided with wash-down facilities for cleaning the wheels of vehicles and any accidental accumulation of mud of the highway caused by such vehicles shall be removed without delay and in no circumstances be left behind at the end of the working day.

Reason: In the interest of pedestrian and vehicular safety and in order to comply with Policy T18 of the Unitary Development Plan

13. NS - Before any part of the new buildings hereby approved are first brought into use, bicycle parking shall be provided at the site in accordance with details hereby approved and shall be permanently retained thereafter.

Reason: In order to comply with Policy T7 and Appendix II.7 of the Unitary Development Plan and in order to provide adequate bicycle parking facilities at the site in the interest of reducing reliance on private car transport

14. NS - Prior to installation of any fixed noise generating plant an acoustic assessment shall be submitted to and approved by the Local Planning Authority to prevent adverse effects from plant noise on local amenity. Once approved the plant shall be installed as approved and permanently maintained thereafter.

Reason: In the interests of protecting residential amenity in accordance with Policy BE1 of the Unitary Development Plan.

15. NS – (i) Prior to any part of the new buildings hereby approved being brought into use a scheme for any external lighting that is to be installed at the site (which for the avoidance of doubt shall not include any flood lighting for the MUGA which will be subject to a separate planning application), including measures to prevent light spillage shall be submitted to and approved in writing by the local planning authority.

(ii) Any such external lighting as approved under part (i) shall be installed in accordance with the approved drawings and such directional hoods shall be retained permanently.

(iii) The applicant should demonstrate that the proposed lighting is the minimum needed for security and working purposes and that the proposals minimise pollution from glare and spillage.

Reason: In order that the local planning authority may be satisfied that the lighting is installed and maintained in a manner which will minimise possible light pollution to the night sky and neighbouring properties and to comply with Policy BE1 of the UDP.

16. NS –(i) Before any of the new school buildings hereby approved are first brought into use a Travel Plan shall be submitted to and approved in writing by the Local Planning Authority

(ii) The Travel Plan should include measures to promote and encourage the use of alternative modes of transport to the car and shall also include a timetable for the implementation of the proposed measures and details of the mechanisms for implementation and for annual monitoring and updating. The Travel Plan shall be implemented in accordance with the agreed timescale and details.

Reason: In order to ensure appropriate management of transport implications of the development and to accord with Policy T2 of the Unitary Development Plan

17. NS - The application site is located within an Air Quality Management Area declared for NO_x: In order to minimise the impact of the development on local air quality any gas boilers must meet a dry NO_x emission rate of <40mg/kWh

Reason: To minimise the effect of the development on local air quality within an Air Quality Management Area in line with NPPF p124 and Policy 7.14 of the London Plan.

18. An electric car charging point shall be provided to a minimum of 5 car parking spaces with passive provision of electric charging capacity provided to an additional 5 spaces before any part of the new buildings hereby approved are first brought into use.

Reason: To minimise the effect of the development on local air quality within an Air Quality Management Area in line with NPPF p124 and Policies 6.13 and 7.14 of the London Plan.

19. (i) The development hereby approved shall include the provision of Photovoltaic Panels on the roof of the secondary and primary school buildings in order to achieve a minimum of 41,971kWh/annum for the secondary school and 17,526kWh/annum for the primary school in addition to the implementation of all measures set out in the Energy Strategies hereby approved, in order to ensure that the secondary school will achieve a minimum of 24% reduction in CO₂ and the primary school a minimum of 35% reduction in CO₂ below ADL2013.

(ii) Within 3 months of the first occupation of either of the buildings hereby approved evidence shall be submitted to the local planning authority to demonstrate that the photovoltaic panels have been installed on each building and the minimum kWh/annum set out in (i) can be achieved.

Reason: In order to ensure that the development can achieve the CO₂ reduction identified in the application submission and will meet the aims and objectives of London Plan Policy 5.2 and UDP Policy BE1 in respect of sustainable design and construction.

20. The Multi Use Games Area (MUGA) hereby approved shall only be used between the hours of 08:25 – 18:00 on any day Monday to Sunday inclusive.

Reason: In the interests of protecting neighbouring residential properties from activities that could result in excessive noise and disturbance outside of normal school hours and in accordance with Policy BE1 of the UDP (2006).

21. NS - Notwithstanding the Town and Country Planning (General Permitted Development) Order 2015 (or any Order revoking, re-enacting or modifying that Order), no plumbing or pipes, other than rainwater pipes, shall be fixed on the external elevations of the buildings hereby approved.

Reason: It is considered that such plumbing or pipes would seriously detract from the appearance of the building(s) and to comply with Policy BE1 in the Unitary Development Plan.

22. NS – The only pedestrian and vehicular access to the school site shall be via Manor Way as shown on the plans hereby approved and no other access shall be created or utilised without prior written consent being first obtained in writing from the local planning authority.

Reason: In accordance with the details of the application as assessed and to prevent harm arising in respect of highway safety or amenity in accordance with Policies BE1 and T18 in the Unitary Development Plan.

23. NS - The development hereby approved shall be carried out strictly in accordance with the phasing plan hereby approved unless otherwise agreed in writing.

Reason: To ensure that the development is carried out in accordance with the approved documents submitted with the application and in the interests of protecting amenity in accordance with Policy BE1 of the UDP. .

Informatives

1. D125 – Mayoral Community Infrastructure Levy

2. NS - Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. The applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0800 009 3921.

3. NS - Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

4. NS - Where a developer proposes to discharge groundwater into a public sewer, a groundwater discharge permit will be required. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Groundwater permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 8507 4890 or by emailing wwriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991.

5. NS - If during the works on site any suspected contamination is encountered, Environmental Health should be contacted immediately. The contamination shall be fully assessed and an appropriate remediation scheme submitted to the Local Authority for approval in writing.

Application No 15/00908/FULL1

Ward: Kelsey And Eden Park

Address : Harris Academy Beckenham,
Manor Way, Beckenham BR3 3SJ

OS Grid Ref: E: 537430 N: 168596

Applicant : Kier Construction

Objections: Yes

Description of Development

Demolition of all buildings on site (except the basketball block) and erection of replacement buildings to accommodate a 3 storey 6FE Academy (8,112 sqm GIA) for 1,150 pupils together with temporary classroom accommodation for a period of two years, provision of 71 car parking spaces, 128 cycle parking spaces, associated circulation and servicing space, multi-use games areas and landscaping.

Key Designations

Biggin Hill Safeguarding Birds
London City Airport Safeguarding
Urban Open Space
Within Manor Way Conservation Area
PTAL1a

Proposal

Harris Primary Beckenham was given permission by the Secretary of State for Education to open a 2FE primary school in September 2014, however following the refusal of an application for temporary accommodation on this site (14/01636) the opening of the school was deferred for a year to September 2015. The application for temporary primary school classes (14/01636) was allowed on appeal.

The current application is for the re-provision of the existing secondary Academy (including 6th form) and temporary secondary school provision. A separate application has been submitted for re-building the secondary school together with a new primary school.

The application proposes:-

- All buildings except the existing substation, store and basketball block will be demolished;
- Erection of a three storey rectangular secondary school building (8,112 sqm) positioned on a north-south axis towards the centre of the site. The building would measure 79m x 44m (largest points) with an overall height of 11m. There is a single storey element on the southern elevation which reduces the width of the extension by 12m at first and second floor level. The building would be constructed of the same buff bricks on the ground floor level with external insulated white render (StoSilco Ltd) on the upper floors, dark grey aluminium fenestration, opening vents with louvres and curtain walling (RAL 7016). The roof would incorporate PVs, plant and rooflights. The plant would have a maximum height of 1.0m from roof level (12m from ground)
- Erection of temporary accommodation for the secondary school to be located adjacent to the basketball block behind the main school building. The double height accommodation would measure 21.6m x 42m x 5.1m high and would accommodate 14 classrooms;
- Erection of temporary single storey changing facilities also to be located behind the main school building measuring 9.6m x 18m
- Creation of 75 parking spaces (including 4 disabled) in front of the secondary school buildings;
- Provision of cycle stores for 128 cycles
- Creation of a new Multi Use Games Area (MUGA) between the secondary school building and parking area in the southeast section of the site;

- Improvements will be made to the pedestrian provision within the existing access road
- Implementation of hard and soft landscaping scheme to complement the new building, facilitate improvements to the existing access and create habitat areas
- Existing basketball courts (southern end of site) and grass pitches (western side of site) will be retained
- The new secondary school will enable the school to operate at its current approved capacity of 1150 pupils and 125 FTE members of staff (the existing school currently operates at 1000 pupils and 100 FTE staff)
- The secondary school would offer its facilities to the local community (which already takes place within the existing school) so would operate 06:30 – 22:00 on weekdays and 09:00 – 16:00 on weekends

Phasing

A phasing plan has been provided to show how the development would be constructed over a period of 2.5 years:

- Phase 1 (five months from start) – installation of temporary classrooms for the secondary school and contractors site accommodation
- Phase 2 (five months from start) – asbestos survey removal and demolition of buildings in the northern sections of the site (Enterprise Building/Small Sports Block and DT Block)
- Phase 3 (months five – twenty one) – construct secondary school buildings
- Phase 4 (months twenty one – twenty eight) – handover secondary school building, remove temporary secondary school classrooms and complete landscaping.

Timing of Submission

The applicant has advised that initial proposals for redeveloping the site for both a replacement secondary school and new primary school commenced in 2014. However, the original contractor appointed in early 2014 had to withdraw from the project for commercial reasons unrelated to the project, which meant the EFA had to repeat its procurement process to find an alternative contractor. Whilst this procurement process was taking place proposed temporary accommodation for the primary school was subject to a separate planning application. Kier were subsequently appointed as the new contractor and have been working with the EFA to bring the project forward. This is the reason for the delay in submitting a full planning application for the provision of a permanent primary school. The applicant did not wish to submit an application for the replacement secondary school in isolation of the application for primary provision as they would like both applications to be determined at the same time.

The applicant has submitted the following detailed reports to support the application:

Acoustics Assessment (prepared by RPS)

This report provides details of external noise levels, internal noise levels within the building and necessary sound insulation. Noise sensitive receptors have been identified (residential properties in Manor Way, Little Acre, Kelsey Way, Village Way and Stone Park Avenue). Two 7 day baseline noise surveys were undertaken. As a result of the surveys sound insulation of facades has been recommended and it is suggested that partially opening windows for natural ventilation is appropriate.

Potential noise levels arising from the external teaching areas has been assessed, the report concludes that external teaching areas should not be used for prolonged periods of time but some external teaching and use of the playground and fields for break times would not cause excessive loss of amenity.

The report recommends that a more detailed plant noise assessment is undertaken once the detailed specification for plant and equipment is known and noise from mechanical services should be designed to be less than 5dB above the L_{A90} background noise. This could be controlled by condition.

Air Quality Assessment (prepared by Air Quality Assessments)

This site lies within an Air Quality Management Area but is not located on any through roads so air quality conditions at the site are shown to be better than air quality neutral. The document considers the

air quality impacts associated with the development in construction and operational phases. Existing air quality conditions have been identified. The potential dust impacts arising throughout construction have been assessed (traffic and construction related activity). The report concludes that mitigation such as a dust management scheme will be required but subject to appropriate measures being put in place the impacts during construction will not be significant. The report considers the potential for operational impacts (traffic and boiler plant) but concludes that there is no requirement to mitigate operational traffic impacts due the number of vehicle movements anticipated. It is necessary to ensure that any boilers on the site comply with GLA standards and thus emit less than 40mg NOx/kWh.

Dust management measures are addressed in the Construction Management Plan and Dust Management Plan.

Arboricultural Method Statement (prepared by RPS)

This report includes details of the tree survey undertaken in order to inform the preparation of the arboricultural implications assessment and method statement. The report is the same as that submitted for application DC/15/00909.

There are a number of trees on the site located in areas of open space, verges and along the site boundaries. A large number of the trees on site will not be affected by the development as they are located on the north, west and southern boundaries far enough away from the development not to be affected. The majority of trees along the existing access route and boundary with Manor Way will be retained although a total of 26 trees and 4 groups need to be removed to facilitate the development. Some tree pruning works will be required.

The report suggests that the construction process will need to be monitored and the Arboricultural Method Statement used to provide guidance. Tree protection fencing will need to be erected and necessary pruning works sensitively carried out.

Construction Management Plan (prepared by Kier)

This document confirms that all site vehicular access will be via Manor Way with traffic directed to arrive from the north only to avoid the traffic island outside of the site. Regular stakeholder meetings will be held to communicate and share programme of works, methods, specific tasks and opportunities to address any concerns raised. There will be a direct link between the Senior Project Team and local residents. Limited onsite parking for contractor and visitors will be provided and will be managed via a permit system. Car share and use of public transport will be promoted and active management of parking outside the site will be undertaken to ensure that this does not cause problems with respect to parking across residents drives or within close proximity of the school entrance. Deliveries will be assigned time slots to avoid peak drop off and pickup times for the school. Use of articulated vehicles will be minimized.

Construction materials and plant will be stored within safe areas inside the site boundary and cleaned before being taken off site. Appropriate site hoardings and heras fencing will be installed to ensure the site is safe and access will be strictly controlled.

Wheel wash facilities will be set up within the site boundary, in addition a local road sweeping company will be employed to maintain the surrounding roads and footpaths.

Kier will register with the Considerate Contractors Scheme. Dust and noise monitoring will take place and level will not exceed British Standards. All works will be undertaken in accordance with relevant HSE Regulations.

The Councils Highways Officer has confirmed that the Construction Management Plan is acceptable.

Design and Access Statement (prepared by Nicholas Hare Architects)

This report sets out the site context, constraints and opportunities. The report confirms that the existing buildings on site have a total footprint of 8,056 sqm, the proposal will significantly consolidate the building area footprint to 4,596 sqm maintaining a 20m zone free of development from most of the site boundaries (existing buildings adjacent to Little Acres will be retained within the 20m zone). On page 27

a comparison diagram shows that there would be an increase in hard sports facilities (increase of 3,481 sqm) and access and parking areas (increase of 1,496 sqm) but a reduction in hard informal and social landscaped space and an increase in habitat areas and soft informal and social space. Altogether hard landscaped space and building footprint combined would reduce by 1,156 sqm.

The report describes the internal layout of the new building and approach taken in terms of massing and architectural treatment.

The report includes a landscape masterplan with details of the widened pedestrian route within the existing access road. Indicative details of boundary treatment have been provided.

The report confirms the access strategy for pedestrians, cyclists, vehicles and servicing. DDA compliant access will be provided throughout the buildings with controlled lift access for staff and pupils with restricted mobility. Appropriate means of escape will be provided.

Dust Management Plan (prepared by Kier)

This document is intended to supplement the air quality assessment. The document has taken account of the GLA SPG 'The Control of Dust and Emissions during Construction and Demolition'. Potential sources of dust generating activity have been identified as well as management procedures.

The document has been reviewed by the Council's Environmental Health Officer and confirmed to be satisfactory.

Drainage Impact Assessment (prepared by Campbell Reith)

This report confirms that the site lies within Flood Zone 1 (low risk). The surface water run-off rates from the existing and proposed developments have been assessed, with the maximum proposed surface water run-off rates being 50% of the existing. Calculations show that even with a 50% reduction, the proposed surface after run-off rate is too high for the existing sewer capacity. Consequently there are requirements for attenuation in the site. Foul water discharge will be via the existing foul sewers on site which discharge the local public sewer in Manor Way.

Energy Strategy (prepared by Van Zyl & De Villiers Ltd)

The report includes a baseline energy demand assessment and details of measures that will be incorporated to reduce energy demand and CO₂ emissions. The report confirms measures taken to reduce energy consumption and carbon emissions will include limiting heat loss through the fabric of the building, avoiding thermal bridging, maximizing natural daylight and ventilation, reducing air permeability, utilizing dimming controls linked to daylight sensors, local light switching, movement and absence sensors for lighting, low energy light fittings, heat recovery mechanical ventilation, low specific fan power and heating controls to optimize plant efficiency. Various low and zero carbon technologies were considered but only PV panels were deemed to be suitable for the development.

It is proposed to explore the use of PVs during the detailed design to achieve 41,971kWh/annum which will bring a total of 24% reduction in CO₂ for the secondary school.

Energy Statement Response to LBL Comments on Energy Strategy (prepared by TP Bennett)

This document was submitted in response to Officers concerns with the Energy Strategy in terms of its content and overall carbon reduction for the secondary school building. The response seeks to justify the approach taken in the Energy Strategy by referring to other schemes within the borough. The applicant is of the view that the strategy meets policy requirements and the proposed measures to reduce energy consumption and CO₂ are appropriate for this education site. The document confirms that the secondary school would achieve a carbon reduction of 24.3%. The secondary school carbon reduction would fall below London Plan requirements.

Phase 1 Preliminary Risk Assessment and Phase 2 Environmental and Geotechnical Site Investigation Report (prepared by RPS)

The report confirms that no potential sources of current ongoing contamination associated with the site or surrounding area have been identified. An unexploded ordnance report indicates that a heavy anti aircraft battery was present on site during the Second World War, which may represent an historical

source of hydrocarbon, metal and asbestos contamination. Four small potentially backfield pond were noted on site which may represent a source of Made Ground. Two tanks potentially containing fuel associated with the historical maternity hospital located to the southwest of the site were also noted. Sampling was undertaken and the report confirms the potential risk posed by on site contaminants of concern to human health receptors is low, potential risk of hydrocarbon compounds is low and risk to surface water receptors and ground gas is also considered to be low.

Planning and Heritage Statement (prepared by TP Bennett)

This statement sets out the site description, planning history, assessment of the proposed development against relevant planning policy and the heritage implications. The applicant considers that the proposal would meet an identified educational need, would not unduly harm the openness of the site, would not have an unacceptable impact on neighbouring amenity, is of an appropriate design which would preserve the character and appearance of the conservation area and would not give rise to a significant detrimental impact on the highway and therefore the proposal is considered to be in accordance with relevant development plan policies.

Statement of Community Involvement (prepared by TP Bennett)

The report states that public consultation was undertaken in respect of the proposal for the replacement secondary school and new primary school. A public consultation exercise was undertaken in January 2014 but the project stalled due to issues with a contractor. As part of the application for temporary primary school facilities a leaflet drop was carried out in December 2014 notifying residents of the intention to re-consult in the New Year on the permanent primary school proposal. A further consultation event was held over 2 days in January 2015. The SCI confirms that 61 people signed the attendance register for the consultation event that took place in January and 50 questionnaires were completed. Some comments from the questionnaire have been included in the document.

Transport Assessment (prepared by RPS)

This assessment covers existing site conditions, trip generation, distribution and development impact and necessary mitigation. The report confirms that the sole access to the site would be via Manor Way, parents will not be allowed to drive into the school but will need to make drop-offs and pick-ups on the local highway network which is the same arrangement as the school currently operating on site. The school gate will remain locked with a member of staff supervising pick-up and drop-off on Manor Way. The nearest bus stops are located on Stone Park Avenue (370m walking distance from the site) which serves bus 352 running at a frequency of every 20 mins. Beckenham Junction Tram and Overground Rail are also located within walking distance of the site.

The report identifies 18 traffic accidents in the vicinity (500m) of the site over the past 5 years of which 15 have been slight and 3 serious with no fatal. One accident involved a child walking to school, this took place in Village Way. No accidents were recorded in Manor Way, the junction with Stone Park Avenue or Kelsey Way.

Parking beat surveys were undertaken on the local highway network during periods where pupils were expected to arrive and depart at the school. The report notes that the redevelopment of the school will not result in any additional pupils beyond the authorised capacity of the existing school. However, the applicant has sought to provide a robust assessment of the trip generation associated with the current shortfall of 150 pupils and 25 FTE of staff. The research undertaken shows that the shortfall in pupil numbers will generate 16 more trips to the school by parents in cars, 89 additional bus trips, 15 trips on foot and 11 by rail, in respect of staff the shortfall would result in 15 car movements, 3 rail movement, 1 cycle, 1 bus and 4 pedestrian movements. Whilst this will be an increase on the existing situation it is important to remember that this would still be within the existing capacity of the school. To accommodate the additional 15 car movements 25 additional parking spaces are proposed.

The report concludes that the additional traffic flow would be barely noticeable on the local network and Manor Way has sufficient parking capacity to address the shortfall.

In terms of mitigation the report proposes a travel plan, improvements to the pedestrian route from Manor Way and controlled construction traffic.

The Councils Highways Officer has assessed the Transport Assessment and his conclusions are set out in the main body of this report.

Travel Plan (prepared by Harris Federation)

A travel plan has been prepared for the secondary school. The document sets out details of the school operation, admissions policies, opening hours, location public transport links, academy ethos and sustainable travel plan, objectives and an action plan.

The plans have been reviewed by the Councils Travel Plan Coordinator who has confirmed that at this stage it does not contain sufficient detail so it is appropriate to attach a condition requiring further submissions.

Updated Ecological Appraisal (prepared by RPS)

The report confirms that an ecological appraisal of the site was undertaken in February 2015. There are 2 statutorily designated sites within 2km of the site and 9 non statutorily designated sites within 2km of the site. As a result of the survey it was concluded that the site has low biodiversity value and is not a recognized nature conservation site although the surrounding hedgerow and trees, mature trees and nature area have some local value. Conserving these features would ensure that the invertebrate diversity on the site would remain undisturbed and feeding for roosting bats and hedgehogs would not be affected. On the assumption that great crested newt and reptiles might be present in the nature reserve area care should be taken to avoid disturbance to this area and its environs during demolition and construction phase. The report suggests that the three buildings and two trees identified as having potential to contain bat roosts will require further surveys to determine if bats are present before they are demolished or felled. The report further suggests that if any trees or other features likely to support breeding birds are to be removed during the breeding season necessary measures should be undertaken.

Measures to enhance ecology could be included in the detailed landscape strategy such as bird and bat boxes, use of dead wood to create habitat for invertebrates, amphibians and reptiles, inclusion of wildflower species and simple and inexpensive management of the existing pond. The report recommends a ratio of >3 boxes per tree being felled which would equate to a total of 78 bat boxes on the site.

Location

Harris Beckenham School is located on the west side of Manor Way, the school and its grounds are designated as Urban Open Space. The existing school currently comprises an arrangement of 1-3 storey buildings with associated sports facilities, areas of hard standing and parking. The school site is accessed via a short road leading from Manor Way to the east. This existing access will be utilised by staff and pupils as part of the redevelopment .

The school site is bounded on all sides by residential properties in Kelsey Road, Kelsey Way, Village Way, Manor Way and Stone Park Avenue. Southwest of the site is Ralph Perring Court, a two/three storey development for elderly residents. The area is primarily residential in character. Beyond properties in Manor Way opposite the school is Kelsey Park. There are entrances to the Park in Manor Way and Stone Park Avenue. There are no restricted parking measures in place at this point along Manor Way.

Comments from Local Residents and Amenity Societies

This application was advertised in the local press, site notices were erected and letters sent to nearby properties. Representations have been received from third parties both supporting and objecting to the proposal. Following the submission of additional information re-consultation was undertaken.

At the time of writing 58 letters of objection had been received. It is noted that a number of the letters are submitted as one objection to DC/15/00908 and DC/15/00909 so some comments within the letters are more relevant to the application which includes a new secondary school.

The following issues have been raised in respect of objections:

- If the MUGA were to be moved to the rear (west) of the secondary school building this would greatly reduce its impact
- The car park could be moved to the north of the secondary school building (where the primary school is proposed) which would greatly reduce its impact
- This road is already heavily congested and this proposal will make the situation worse
- Increased parking problems for Manor Way
- There have been recent road traffic accidents involving the school
- The school doesn't police children coming and going at the moment so this situation will be made worse
- The existing access is insufficient for construction vehicles
- The existing access is not fit of purpose and cannot accommodate an intensified use
- A 3 storey building will be visible from the road and harmful to the conservation area
- The applicant has refused to consider alternative pedestrian access
- The proposal will degrade the conservation area
- The new buildings will give rise to a loss of privacy for neighbouring gardens and houses
- The new buildings will have an adverse impact on light to neighbouring gardens
- The access into the site is dangerous
- Residents full support the views of KEPA
- The proposal would result in a cramped form of overdevelopment
- The proposal represents a threat to the Urban Open Space
- The increase in pupil numbers and traffic will adversely affect the character of the conservation area
- The Transport Assessment does not assess the impact of use of the MUGA during non-school hours but this facility is an all-weather pitch which could be used during evening, weekends and holidays.
- The parking stress surveys undertaken are insufficient
- No mitigation for noise pollution has been offered
- The replacement school will open in the evenings and weekends which will cause more disruption
- There is concern that the hard surfaced play area will be turned into a sports pitch with floodlighting
- Pupils access to green space and playing fields will be reduced
- The quality of life for pupils will be reduced by overcrowding
- The information given with respect to works to trees in the submitted documents is inaccurate, more work will be required to facilitate the proposal
- This is an unjustified intensification of Urban Open Space
- The applicant has refused to consider alternative pedestrian access
- The proposal will degrade the conservation area
- The new buildings will give rise to a loss of privacy for neighbouring gardens and houses
- The new buildings will have an adverse impact on light to neighbouring gardens
- Pupils and staff will be able to see into adjoining residential properties any CCTV would further harm neighbours privacy
- The proposed MUGA is now closer to residential dwellings this will lead to noise and light pollution
- There are insufficient means of public transport in this area
- The access into the site is too dangerous for primary school children
- The PINS Inspector for the previous appeal confirmed that little weight had been given to education need. Now that Langley Primary School has been approved there is even less need for additional places in this area
- What sequential tests have been undertaken in respect of harm to the conservation area
- The Councils own evidence base for education need shows that there is only a need in Areas 5 & 6. Other areas have a surplus of places
- There has been no proper consultation between the Developer and residents
- The Statement of Community Involvement submitted by the applicant is flawed

- The proposal would result in a cramped form of overdevelopment
- The proposal represents a threat to the Urban Open Space
- The increase in pupil numbers and traffic will adversely affect the character of the conservation area, as this is a permanent proposal the harm will be significant and the proposal will permanently and unacceptable alter the character of the conservation area
- No mitigation for noise pollution has been offered
- A previous application was refused for temporary additional facilities on the site. This was only allowed on appeal because the proposal was for a 5% increase in intensification, was for a temporary period and would not result in permanent impact and no after school clubs. This is completely different to the current proposal
- The Council could use s106 powers to enforce access from Kelsey Way
- The PTAL Rating of this site is very low (1a) so this site is not suitable for additional development as parents will have to drive to the school
- The revised information submitted does not address the concerns raised originally
- The new buildings will provide opportunities for overlooking and loss of privacy
- Removal of 26 trees is unacceptable, this will affect wildlife and neighbouring amenity
- The new footpath providing access behind the car park will be located close to residents boundaries causing noise and disturbance
- There will be dust pollution as a result of the construction

Peacock and Smith Planning Consultants submitted a letter of objection on behalf of the Residents Association

The grounds of objection are summarised below (full comments can be viewed on the application file)

- There are serious shortcomings in the technical evidence which prevents third parties and the council understanding the application
- The acoustic assessment fails to address impact on the amenities of neighbouring residents resulting from increased intensity in use of the site (school buildings and MUGA)
- There are no times stated for use of the all weather pitch which means it could be used during the evenings and at weekends, this could generate noise and disturbance at sensitive times and the need for flood lighting
- The TA does not assess the impact of the site being used at evening, weekends and during holidays
- The parking surveys should have been undertaken in summer when Kelsey Park is used more intensively
- The assumption that 43% of pupils attending the primary school will arrive/leave by car is a substantial underestimate
- Additional information to address the points raised should be submitted
- The proposal will result in trees being felled
- The proposal introduces a new path close to neighbouring gardens which will cause harm to amenity
- There is no evidence that the Travel Plan will be implemented effectively

The applicant has submitted a response to the objections raised (attached as Appendix 1 to this report)

At the time of writing 54 letters of support had been received. The following issues have been raised in respect of support:

- Proposals for the primary and secondary schools would be positive
- This Academy is long overdue new facilities, the existing buildings are outdated and not fit for purpose
- Any adverse effects of construction will be temporary
- A new primary school on the same site as an existing secondary school will enable shared facilities
- This is a sustainable location for increased school facilities
- The transport statements shows that this proposal would not have a significant traffic impact
- Any harm to residents doesn't outweigh the benefits of the scheme
- A school has been in this location for years, expansion is needed and appropriate

- Temporary facilities for a primary school exist on this site, this is a material consideration
- When granting the appeal for temporary facilities the Inspector concluded that there is an educational need, the development would not adversely affect the conservation area and there would be no significant harm to neighbouring residents. He considered expansion to be sustainable.
- The proposals would provide much improved facilities
- The secondary school has a smaller footprint than the current buildings
- This is a really good school
- The transport assessment submitted shows that any impact can be mitigated
- Existing children in this area need to travel to school in other parts of the Borough so there is a need for a new school here

Additional comments received will be reported verbally to the committee.

Comments from Consultees

Thames Water: No objection subject to recommended Informatives

Environment Agency: No objection subject to recommended conditions

Drainage: The submitted Drainage Impact Assessment carried by CampbellReith consulting engineers with Project No. 11866 dated February 2015 to provide 2 tanks to reduce surface water run-off to 45l/s for all events including the 1 in 100 plus 20% storm event is acceptable. The applicant is also considering the use of soakaways and that will be confirmed at the later stage, once soakage test is carried out to establish the suitability of the soil for infiltration. Please impose condition to comply with the submitted strategy.

Highways (summary – full comments incorporated into the analysis below): The development proposals would have an impact on the operation of the local highway network, however as the development is within the authorised capacity and it was shown that the road network can manage the additional traffic, on balance I raise no objection subject to recommended conditions.

Environmental Health (initial comments): Noise: The acoustic report does not comment in depth on the possibility of noise from pupils affecting residential amenity and this has not been assessed. There may be a noticeable increase in noise from children on break times etc... If this is a concern then the applicant should provide a further acoustic assessment to determine the current and likely future noise levels affecting surrounding residents, taking account of these sources. An assessment would allow the applicant to address this concern directly. Given the existing permitted use is as a school this may be considered acceptable. Reasonable internal noise levels in the proposed buildings can be achieved as outlined in the acoustic report. I do not agree with the proposed plant noise standards although as plant is currently unknown anyway this can be dealt with by of the recommended condition.

Contamination: The report finds low risk and further contamination measures are not considered necessary. Contamination issues should not be a bar to the proposed development however I would recommend an informative.

Air Quality: The air quality assessment finds that the impact of the development with appropriate mitigation will be insignificant although it highlights the potential for dust emission. The construction management plan does not go into detail on dust control and only states: *'Each construction activity will be risk assessed with regards to process and Kier procedures and where necessary proprietary equipment will be used to control activities where dust and debris may be produced during any activity.'* In order that we can see and approve measures to control dust, a condition is recommended.

I would also suggest a condition in respect of controlling the NOx emissions from gas boilers to minimise air quality impact within the AQMA.

Lighting: No floodlights or MUGA\sports pitch lights are proposed. It may be prudent to attach a condition for submission of details of access road car park and other lighting to prevent any impact on amenity.

Environmental Health (final comments): The additional information submitted in respect of noise, dust and air quality is acceptable. The recommended condition regarding plant noise should remain. The other aspects I am satisfied have been addressed and I would not object to the development.

Cleansing: No objection

Design & Conservation: The proposal site lies outside the Manor Way conservation area with only an access route from the conservation area. Therefore Policy BE13 for Development adjacent to a conservation area and BE11 are relevant. The most important views into and out of this conservation area are along Manor Way itself, and the gaps between the houses. Given how far this proposal is set back there will be no visual harm caused in this respect and indeed the proposed buildings are more attractive and rational than the current dated buildings on site. Any views of the development from back gardens would not in my view be harmful due to the large separation and screening.

In the appeal decision on 14/01636/FULL1 the inspector noted that the “function” of a site could be considered as a factor impacting upon the conservation area. However, the educational use on this site is an established part of the character of this area and I note that there have not been any Highways objections in principle. Therefore I would expect that an increase in activity such as pedestrian or traffic movements within the conservation area could easily be handled and mitigated through the travel plan.

In conclusion I raise no conservation concerns and if minded to recommend permission I suggest that any boundary treatments are conditioned.

Tree Officer: Tree removals comprise the loss of 26 individual trees and 4 groups to facilitate the proposed scheme consisting 2 box elder, 2 mountain ash, 3 ash trees, 1 prunus, 1 maple, 1 oak tree , 1 field maple. 1 willow and 1 apple. Other trees are shown to be removed for arboricultural reasons distinct from the planning application proposal. The most significant of these are T83 Willow and T35 and T36 Ash of which are prominent within the site. The loss of T35 and T36 is required in order to upgrade internal vehicular access, with the removal of T83 required to enable the proposed building footprint for the new secondary school building and hardcourt area.

The loss of these trees is regrettable as they are high canopy and prominent when viewed from within the site, however on balance there is likely to be very little impact upon the streetscape, adjoining residential properties or local amenity, due to the presence of other existing trees close to the site boundaries, and I would therefore raise no objection subject to satisfactory mitigation.

The majority of trees are located mainly within the sites perimeter boundaries, and so unaffected by the proposal. Those trees which are within close proximity to the proposed construction are shown to be protected by way of ground protection, non-dig surface construction and fencing, based upon and in accordance with BS 5837: 2012 and described with Tree Protection Plan ref. JKK7990_figure 04.01 and JKK7990_figure 04.02. A new footpath is proposed to link the main pedestrian access and passing to the east of the upgraded parking arrangement. The line of the path will fall within and close to existing trees located within the protected areas adjacent to rear gardens within Manor Way. It is especially important that no-dig designs are implemented along this stretch of new hardstanding.

Tree losses based upon the above submitted details are in my opinion sustainable and can be mitigated. The remaining existing trees are to be retained in accordance with industry guidelines.

Subject to satisfactory drafting and implementation of Tree and Landscape condition I would recommend that no objection is raised.

Education Services: Although we would support the improvements to the secondary school set out in DC/15/00908 we are concerned about the implications of omitting the primary application for which there is a demonstrable need.

Planning Considerations

The application falls to be determined in accordance with the following Unitary Development Plan (UDP) policies:

T2 Assessment of Transport Effects
T3 Parking
T6 Pedestrians
T7 Cyclists
T15 Traffic Management
T18 Road Safety
BE1 Design of New Development
BE11 Conservation Areas
BE13 Development Adjacent to a Conservation Area
G8 Urban Open Space
C1 Community Facilities
C7 Educational and Pre School Facilities
NE7 Development and Trees

Bromley's Draft Local Plan: Policies and Designations Document has been subject to public consultation and is a material consideration (albeit it of limited weight at this stage). Of particular relevance to this application are policies:

Policy 6.5 Education
Policy 6.6 Education Facilities
Policy 7.1 Parking
Policy 7.2 Relieving congestion
Policy 7.3 Access to services for all
Policy 8.20 Urban Open Space
Policy 8.36 Conservation Areas
Policy 8.37 Development adjacent to a Conservation Area

In strategic terms the most relevant London Plan policies are:

Policy 3.18 Education Facilities
Policy 5.1 Climate Change Mitigation
Policy 5.2 Minimising Carbon Dioxide Emissions
Policy 5.3 Sustainable Design and Construction
Policy 5.5 Decentralised Energy Networks
Policy 5.6 Decentralised Energy in Development Proposals
Policy 5.7 Renewable Energy
Policy 5.11 Green Roofs and Development Site Environs
Policy 5.12 Flood Risk Management
Policy 5.13 Sustainable Drainage
Policy 6.3 Assessing effects of development on transport capacity
Policy 6.9 Cycling
Policy 6.10 Walking
Policy 6.11 Smoothing Traffic Flow and Tackling Congestion
Policy 6.13 Parking
Policy 7.1 Lifetime Neighbourhoods
Policy 7.2 An Inclusive Environment
Policy 7.4 Local Character
Policy 7.6 Architecture
Policy 7.8 Heritage Assets and Archaeology
Policy 7.14 Air Quality
Policy 7.15 Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and promoting Appropriate Soundscapes
Policy 7.19 Biodiversity and Access to Nature

Policy 7.21 Trees and Woodland

The National Planning Policy Framework 2012 (NPPF) is relevant, particularly paragraphs 72 (education) and 211 - 216 (status of adopted and emerging policies).

Planning History

The site has been the subject of numerous previous applications in respect of extensions and alterations to the school buildings.

The most relevant of which is 14/01636/FULL1 for "*erection of 3 temporary buildings to provide primary school accommodation for 2 forms in 2014/15 and 2 forms in 2015/16 plus staff support, together with associated hardstanding and landscaping works and 2 car parking spaces*".

This application was refused by Planning Sub-Committee on 17th July 2014 for the following reason:

The proposed development would represent a cramped, over-intensive use of the site, giving rise to a detrimental impact on the character of the area, including the Manor Way Conservation Area, and on the amenities of nearby residential properties by way of increased traffic generation and parking pressure, not outweighed by local educational need, and thereby contrary to Policy BE1, BE13, C1, C7, T3 and T18 of the Unitary Development Plan.

The application was subsequently allowed on Appeal. It is not considered that the appeal decision is particularly relevant to this application as this application relates to re-provision of the secondary school only. This application will be assessed on its merits having regard to development plan policies and other material planning considerations such as third party representations.

DC/14/04290: Erection of 2 temporary buildings to provide primary school accommodation for 60 pupils plus staff until September 2016, together with associated hardstanding and landscaping works and 7 additional car parking spaces. Withdrawn by the Applicant after Appeal Granted for DC/14/01636.

Conclusions

The main issues to be considered are:

- Principle and Educational Need
- Impact on designated Urban Open Space and Trees
- Design and impact on the Conservation Area
- Highways impact
- Impact on neighbouring amenity
- Impact on ecology
- Sustainability
- Planning obligations

Principle and Education Need

UDP Policy C7, London Plan Policy 3.18 and paragraph 72 of the National Planning Policy Framework set out requirements for the provision of new schools and school places. It is important to note that this proposal would result in new buildings for an existing school; the pupil intake would be the same as the existing school which currently does not operate a full capacity. Consequently the proposal would not actually result in new school places.

The NPPF, para 72 states that

The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen the choice in education. They should

- give great weight to the need to create, expand or alter schools; and

- work with schools promoters to identify and resolve key planning issues before applications are submitted

In this regard pre application meetings were held outlining the planning issues affecting the site, the emerging Local Plan and the timescales for the Development Control and Local Plan processes.

The NPPF was preceded in Aug 2011 by a joint ministerial statement on planning and education from Eric Pickles and Michael Gove. It was not replaced by the NPPF and therefore remains a material consideration. It is strongly worded to ensure that the answer to proposals for the development of state-funded schools should be, wherever possible, “yes”.

London Plan Policy 3.18 encourages new and expanding school facilities. Sections C&D are amended in the newly adopted March 2015 version to include new references to the projected shortage of secondary school places and the contribution of Free Schools and Additionally Section D indicates that, *proposals for new schools, should be given positive consideration and should only be refused where there are demonstrable negative local impacts which substantially outweigh the desirability of establishing a new school and which cannot be addressed through the appropriate use of planning conditions or obligations.*

UDP Policy C7 supports applications for new or extensions to existing schools provided they are located so as to maximise access by means other than the car.

As set out above there is planning policy support at local, regional and national level for the provision of education facilities within existing planning policy documents. There is a clear commitment to extending/intensifying existing sites where possible. The proposal to re-provide an existing school in new and fit for purpose buildings that would enable the school to operate at its full capacity accords with the aims and objectives of national and local policy.

In addition it is appropriate to consider emerging policies. Draft Policy 6.5 of the emerging Local Plan defines existing school sites as 'Education Land.' Policies 6.5 and 6.6 of the Draft Local Plan support the delivery of education facilities unless there are demonstrably negative impacts which substantially outweigh the need for additional education provision, which cannot be addressed through planning conditions or obligations. In the first instance opportunities should be taken to maximise the use of existing Education Land. Paragraph 216 of the NPPF enables due weight to be given to emerging policies depending on their degree of consistency with the policies in the Framework. In this instance it is considered that there is significant compliance with existing policies and so greater weight can be given to the emerging policies. As a recently adopted policy, considerable weight can be given to the London Plan policy 3.18. This will be further addressed at the end of this report.

The replacement secondary school is considered to be acceptable in principle as it would enable the existing school to reach its full capacity and would not have a significant adverse impact on open space, trees, neighbouring amenity or highways. Furthermore the proposal would preserve the character and appearance of the conservation area.

Impact on the designated Urban Open Space (UOS) and Trees

Adopted UDP Policy G8 permits built development in Urban Open Space where

- i. it is related to the existing use..., or
- ii. ...is small scale and supports the outdoor recreational uses or children’s play facilities on the site, or
- iii. any replacement buildings do not exceed the site coverage of existing development on the site,

Where built development is involved the Council will weigh any benefits to the community such against a proposed loss of open space.

In all cases, the scale, siting, and size of the proposal should not unduly impair the open nature of the site”

The draft Urban Open Space Policy 8.20 amends the last clause (as shown below) to increase the flexibility for school expansions on Urban Open Space sites

“Where there is a demonstrable need for additional education buildings sensitive siting will be sought to ensure that the impact on the open nature of the site is limited as far as possible without compromising the educational requirements. In all other cases, the scale, siting, and size of the proposal should not unduly impair the open nature of the site”

The proposal is related to the existing use in that it will replace an existing secondary school on the site. The proposed buildings would be located largely on the area of site already occupied by buildings, away from the main area of the UOS. The existing buildings on site have a total footprint of 8,056 sqm, the proposal will significantly consolidate the building area footprint to 4,596 sqm maintaining a 20m zone free of development from most of the site boundaries (existing buildings adjacent to Little Acres will be retained within the 20m zone). On page 27 a comparison diagram shows that there would be an increase in hard sports facilities (increase of 3,481 sqm) and access and parking areas (increase of 1,496 sqm) but a reduction in hard informal and social landscaped space and an increase in habitat areas and soft informal and social space. Altogether hard landscaped space and building footprint combined would reduce by 1,156 sqm.

Consequently the proposal will have less building and site coverage than the existing school and associated hard landscaped spaces which will improve the sense of openness on the site. The new buildings are located further away from the most sensitive eastern boundary of the site whilst not encroaching into the western section of the site which comprises open space with soft landscaped sports pitches. Consequently it is not considered that there would be any significant adverse impact on the UOS.

The additional car parking spaces will be located within an existing parking area albeit with some minor encroachment onto an area of soft landscape. However, this would not adversely affect the open character of the site.

In this instance it is considered that the proposed development meets the requirements of the adopted UOS policy G8.

The existing and emerging policies relating to UOS support the provision of new education facilities on UOS unless there are demonstrable negative local impacts.

Trees

Policy NE7 requires proposals for new development to take particular account of existing trees on the site and on adjoining land. It is recognized that a number of trees (26 individual trees and 4 groups) will be removed as part of the proposal. However a large number of trees will still be retained and a strong green buffer would still be present around the site boundaries, which will soften the impact of the development from neighbouring properties as well as providing good visual amenity for the school and opportunities for ecology. The Councils Tree Officer has confirmed that the loss of trees is acceptable.

The majority of trees are located mainly within the sites perimeter boundaries, and so unaffected by the proposal. Those trees which are within close proximity to the proposed construction are shown to be protected by way of ground protection, non-dig surface construction and fencing, based upon and in accordance with BS 5837: 2012 and described with Tree Protection Plan ref. JKK7990_figure 04.01 and JKK7990_figure 04.02. A new footpath is proposed to link the main pedestrian access and passing to the east of the upgraded parking arrangement. The line of the path will fall within and close to existing trees located within the protected areas adjacent to rear gardens within Manor Way. It is especially important that no-dig designs are implemented along this stretch of new hardstanding.

A landscape masterplan has been provided as part of the Design and Access Statement. Whilst this is considered to be acceptable to show the landscape concept for the site, it is not of sufficient detail to prevent the requirement for a further landscape submission which will be controlled by way of a condition. The detailed landscaping submission must include details of boundary treatments and ecological enhancement measures.

Ecology

Planning Authorities are required to assess the impact of a development proposal upon ecology, biodiversity and protected species. The presence of protected species is a material planning consideration. English Nature has issued Standing Advice to local planning authorities to assist with the determination of planning applications in this respect as they have scaled back their ability to comment on individual applications. English Nature also act as the Licensing Authority in the event that following the issue of planning permission a license is required to undertake works which will affect protected species.

In this instance it is considered that appropriate surveys have been taken to enable the local planning authority to determine the application. The assessment undertaken by the applicant sets out the measures that would be required to protect any species that may be present on site.

The habitat survey submitted suggests a range of mitigation to prevent adverse impact to Bats and to enhance ecology at the site. It is considered appropriate to secure suggested measures through the use of conditions.

Design and impact on the Conservation Area

Design is a key consideration in the planning process. Good design is an important aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. The NPPF states that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.

The NPPF requires Local Planning Authorities to undertake a design critique of planning proposals to ensure that developments would function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development. Proposals must establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit; optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks. Developments are required to respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation. New development must create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and are visually attractive as a result of good architecture and appropriate landscaping.

London Plan and UDP policies further reinforce the principles of the NPPF setting out a clear rationale for high quality design. UDP Policy BE1 sets out a list of criteria which proposals will be expected to meet, the criteria is clearly aligned with the principles of the NPPF as set out above.

The school site lies adjacent to the Manor Way Conservation Area (and part of the access route falls within the boundary of the Conservation Area). Consequently the proposal must be considered against Policy BE11 of the UDP in terms of impact upon the conservation area. This policy requires development proposals to preserve or enhance the character and setting of the conservation area.

The proposed building has been designed with a simple form and structure. The mass of the block is broken up and the facades articulated with uniform and well-proportioned fenestration. The set back on the first and second floor levels in the centre of the block and use of different external cladding material for the ground floor of the secondary school block helps to articulate the proportions of the building further breaking up the mass. The scale and form of the building is appropriate for this location.

The materials palette is limited to the use of brick, render and aluminium fenestration and detailing. Large scale bay studies have been provided to show how the design will be executed in detail to ensure that a good quality can be achieved through the use of 150mm rendered reveals, rendered soffits and drip details on the rendered sections, full brick reveals on the brick elements, return ends on cills, internal soil and vent pipes and a simple uncluttered approach to the facades. The submission of

such details enables officers to have confidence in the execution of the design and to secure design quality as an integral part of the permission. Material samples have been provided thus negating the need for any pre commencement conditions in respect of materials.

Officers initially raised concerns with the extensive use of white render for the secondary school building in terms of appearance, quality and longevity as this material is prone to staining and weathering which can result in a very poor appearance in a relatively short timeframe. When using render it is necessary to ensure that the building has been appropriately detailed to reduce the number of external pipes, vents and ad hoc apertures in the façade as these all contribute to staining of the render. It is also necessary to consider the location of the building as render is not a robust choice of material for heavily trafficked locations. In response to the concerns raised the applicant has confirmed the specific manufacturer for the render providing technical specification, has designed the building with internal soil and vent pipes and has reduced the need for external vents and ad hoc apertures in the façade consequently limiting the potential of excessive staining and has provided detailed bay studies and sections to show the build quality. This location is not heavily trafficked and as the buildings are set back into the site they will not suffer excessive pollution or weathering. On balance, in this specific location render is considered to be an appropriate material that will complement the remaining materials pallet.

Over all the design approach is simple but fit for purpose and will result in a good quality development.

The building will be visible from surrounding residential properties but not within the streetscene and will not be readily visible in the conservation area. Consequently there will be no impact in design terms on the character or appearance of the conservation area. The new school will enable the academy to operate at its currently authorised capacity and therefore Officers are not of the opinion that this will detract from the character of the conservation area. Overall the proposal is considered to preserve the character and appearance of the conservation area.

Impact on highways and parking

The NPPF recognises that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, safe and suitable access to the site can be achieved for all people. It should be demonstrated that improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. The NPPF clearly states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

London Plan and UDP Policies encourage sustainable transport modes whilst recognising the need for appropriate parking provision. Policy T2 requires the submission of Transport Assessments for development likely to be significant generators of travel and Policy T3 with Appendix II sets out adopted car parking standards which should be used as a basis for assessment.

The applicant has submitted a Transport Assessment (TS) which sets out details of the highway, traffic and parking implications of the scheme.

The proposals are to redevelop the Secondary School buildings at Harris Academy Beckenham. The school currently has in the region of 1,000 pupils enrolled; however the authorised capacity of the school is 1,150 pupils. These additional places are anticipated to be filled on completion of the redevelopment. In order to cater for the pupils a further 25 FTE staff will be employed further to the 100 existing FTE members of staff.

The site is located in an area with low PTAL rate of 1a (on a scale of 1 - 6, where 6 is the most accessible).

Vehicular Access

The school is accessed from Manor Way utilising the existing arrangement. The main pedestrian access to the site is from Manor Way on its western boundary. Footways are continuous along Manor Way between the school entrance to the south to Stone Park Avenue and to the junction with Kelsey Park Road to the north. This in turn provides foot access to A222 High Street, which forms Beckenham town centre. It is proposed to utilise the existing arrangements for the replacement secondary school. This is considered to be acceptable and it is important to note that the proposals do not exceed the already authorised capacity of the school. The school currently employs a management scheme whereby a member of staff stands at the school entrance to control movements into and out of the site at the start and end of the school day. Further to this the gates at the entrance to the school are locked at 08:10 to prevent people driving onto the site without prior appointment.

On-Street Parking Surveys of Local Highway Network

The school proposes that in line with current arrangements for the secondary school, parents driving their children to school should not enter the school site, but instead undertake to drop-off and pick-up their children from the local surrounding road network.

In order to establish the available parking capacity that exists on the local network at present, parking beat surveys were undertaken on Friday 6th February 2015 in line with the Lambeth Methodology which requires surveys to incorporate all roads within a 200m walking distance of the site, surveys should be undertaken at appropriate times of the day/week. The extent of the surveys were discussed and agreed with the Council's Highways Team. The results of the parking beat surveys show the impact on the local network for the peak hours of 08:00-09:00 and 14:30-15:30. This corresponds with the surveys in 2015 undertaken on a Friday when all pupils begin the day at 08:30 and finish the day at 14:50. These two peak hours therefore represent when at present most demand for on street parking associated with parents dropping-off and picking-up their children from the school would occur.

The parking beat survey results show maximum existing 'parking stress' in the AM Peak hour of 24% and 36% in the PM Peak hour. This means that there is considerable spare capacity to accommodate further on-street parking in close proximity to the school entrance.

Dwell Time Surveys

Dwell time surveys were recorded as part of the parking beat surveys in Manor Place and the surrounding roads in February 2015. The average dwell times were recorded as 4 minutes and 8 seconds for the AM Peak and 16 minutes and 31 seconds for the PM Peak.

Pupil Travel to School

In order to establish the modal splits of pupils travelling to the school site use has been made of pupil travel surveys undertaken at the existing Harris Academy Secondary School as part of the Travel Plan process. These surveys were undertaken in March 2014. Table below shows the modal splits from the pupil surveys:

Mode of Travel	Mode Share (%)
Walk	9.9%
Cycle	0%
Bus	59.6%
Rail	7.1%
Car Passenger	10.6%
Mixture	12.8%
Total	100%

Staff Travel to Work- Table below shows the modal splits from the staff surveys.

Mode of Travel	Mode Share (%)
Walk	16%
Cycle	3%

Bus	3.3%
Rail	11.3%
Car Driver	58%
Car passenger	3%
Other	5.4%
Total	100%

Car Parking

The total number of staff employed at the new Secondary School will be 125 FTE. Applying the staff car modal share of 58% identified in the March 2014 staff surveys, equates to a requirement of 73 spaces for members of staff. The proposals include 75 car park spaces. This means that there will be two parking spaces left over for visitors. Four of the parking spaces will be allocated to disabled standards.

128 cycle parking spaces will be provided for the revised Secondary School in line with the required standards. The uptake of such cycle parking spaces will be monitored as part of the Travel Plan and further spaces provided if deemed necessary.

Servicing Arrangements

The deliveries and refuse collections will be coordinated in line with existing arrangements for the school. The proposed layout includes a service yard and plant room located to the north of the secondary school buildings. A turning area has been provided to allow service vehicles to turn safely within the school site.

Trip Generation and Development Impact

The trip generation of the shortfall of 150 pupils has been based on Harris Academy Secondary School pupil surveys undertaken in March 2014.

Method of Travel	Pupil Mode Split	Pupil Trips (150 Pupil Shortfall)
Walk	9.9%	15
Cycle	0%	0
Bus	59.6%	89
Rail	7.1%	11
Car Passenger	10.6%	16
Mixture	12.8%	19
Total	100%	150

Table below provides a summary of the number of trips by each mode of travel.

The table shows that the shortfall in pupil numbers will generate 16 more trips to the school by parents driving their child to school. The majority of additional movements would be by bus generating 89 additional trips, 15 trips would be on foot and 11 by rail.

Staff Trip Generation

The modal split of 25 FTE members of staff travelling to the school site has been identified using data from the March 2014 surveys undertaken at the School.

Method of Travel	Staff	Staff
Walk	16%	4
Cycle	3%	1
Bus	3.3%	1
Rail	11.3%	3
Car Driver	58%	15
Car passenger	3%	1
Other	5.4%	1
Total	100%	25

The staff numbers would generate an additional 16 movements to the site by car. A total of 25 additional parking spaces have been provided for the use of the school on site, this will therefore more than comfortably address such a demand. Furthermore 4 additional movements would be on foot and 3 would utilise rail travel.

Impact on Manor Way

The table below provides the analysis of the increase in traffic flows on Manor Way.

Time Period	Manor Way (Existing Two-way Flow)	Pupil Shortfall Vehicular Trips	Staff Shortfall Vehicular Trips	Overall Change in Traffic Flows	% Impact on Manor Way
08:00-09:00	262	16	15	31	+12%
15:00-16:00	159	16	15	31	+19%

The table shows the increase in trips associated with the shortfall in pupil and staff numbers at the School will generate a small increase in traffic flows on Manor Way during the peak hours. This would equate to one additional vehicle movement every two minutes. Existing flows on Manor Way are low and therefore the development proposals are not expected to create any significant capacity constraint.

Parking Beat Assessments

Parking beat surveys were undertaken on the road network within 200 metres of the site to establish existing on-street ‘parking stress’ and the likely impact of future pick-up and drop off trips associated with the additional 150 pupils attending the School.

This assessment were based on the assumption that all pupils arrive between 08:00-09:00 and leave between 14:30-15:30. It also assumes that all pupils arriving / departing by car are travelling in separate vehicles. This modelled a worst case scenario.

The results show that the on-street parking demand that is likely to be generated by parents escorting the additional 150 pupils to the secondary school, the parking stress as a maximum could increase to 25% during the morning peak hour and 38% for the afternoon peak, which accounts for the longer dwell times expected in the PM peak. It is therefore concluded that there is sufficient on-street parking capacity to accommodate the requirements of the additional pupils at the secondary school when operating at full capacity.

In conclusion it is considered that the development proposals would have an impact on the operation of the local highway network; however as the development is within the authorised capacity and it was shown that the road network can manage the additional traffic; on balance the Council’s Highways Officer has advised that the proposal is considered to be acceptable from a highway perspective.

Impact on neighbouring amenity

Policy BE1 of the UDP seeks to protect existing residential occupiers from inappropriate development. Issues to consider are the impact of a development proposal upon neighbouring properties by way of overshadowing, loss of light, overbearing impact, overlooking, loss of privacy and general noise and disturbance.

The concerns raised by neighbours in respect of the impact on their amenity by way of overlooking, loss of privacy, noise and disturbance have been duly considered in the balanced assessment of this application. When considering the impact of the proposal in this respect it is necessary to acknowledge that a school already exists on this site, the existing school comprises substantial buildings, car parking located between the buildings and the properties in Manor Way, the same access route as currently proposed and extensive areas of hard and soft landscape. Consequently there is already a degree of noise and activity associated with the use of the this site in its current form whereby pupils and teachers have access to the site in its entirety including the ability to utilise soft landscaped areas up to the adjoining boundaries with neighbouring properties. It is therefore necessary to consider whether the

proposal would give rise to an increase in noise, activity, overlooking and loss of privacy and whether that increase would amount to significant harm so as to warrant refusal of this application. It is also necessary to have regard to the fact that the school could accommodate 1150 pupils within its authorised use.

An important consideration is the relationship of the new development to neighbouring properties. Taking the closest measurements based on the nearest residential property to the shared boundaries, the new secondary school would be located over 100m from the boundary with properties in Manor Way. It is recognized that the MUGA will be located closer at 40m and the parking area 15m with a new path providing pedestrian access from the entrance road to the buildings on the southern section of the site incorporated into the landscaping scheme located 5m from the boundary of the rear gardens in Manor Way. It is also important to note that the properties adjoining this site benefit from generous rear gardens ranging between 20-40m in depth resulting in a significant distance between the rear elevations of residential dwellings and the proposed secondary school building.

It is considered that sufficient distances would be retained between the new building and the rear elevations of neighbouring properties to prevent any adverse impact in terms of over shadowing, loss of light or light pollution. Furthermore it is not considered that any overlooking or loss of privacy that could occur in terms of residential gardens or windows would be so detrimental as to warrant refusal of this application given the generous distances that would be retained.

The MUGA, parking areas and new path will generate activity and noise. Pupils will utilize the path introducing more activity closer to the boundary with the rear gardens of properties in Manor Way. The path is required to provide pedestrian access to the school buildings without needing to walk through the car park. It is not considered that the parking area or new footpath would generate an unacceptable level of activity, noise and disturbance. There is already the potential for staff and pupils to utilise this area of the site should they choose to do so and any increase would be unlikely to cause significant harm to amenity.

It is important to note that the application does not include any flood lighting for the MUGA as it is not intended to use this facility in the evening. Whilst the school buildings will be available for community use until 22:00 on weekdays it is not considered appropriate to allow the MUGA to be used until this time. The acoustic assessment suggests that the external areas within the site should not be used for prolonged periods and therefore it is appropriate to attach a condition preventing use of the MUGA after 18:00 on any day. If flood lighting is sought in the future this would require a separate planning permission which would be assessed on its own merits and may not be granted. This issue has been raised with the applicant and they are fully aware that approving a MUGA as part of this application is entirely without prejudice to the assessment of any future proposal for flood lighting.

It is recognized that the proposal will result in the school being fully utilised. This will result in an increase in pupils and teachers using the site. This will also give rise to an increase in activity and noise as a result of drop offs, pick-ups and day to day operation. However, it is not considered that the increase in people using this site and the activities associated with the operation of the new school building would give rise to unacceptable disturbance that would result in significant harm to neighbouring amenity, given the size of the site, its relationship to neighbouring properties, the fact that the noise and activity will be largely limited to daytime hours (albeit with some community use of the buildings in the evenings) and having regard to the existing and long established use of the site for educational purposes.

It is recognised that during implementation of the planning permission there could be an increase in noise and disturbance from construction related activity including vehicular traffic. Operational traffic has been discussed above and the impact has been deemed to be acceptable. Construction related noise and activity cannot be avoided when implementing a development of this nature and scale. This is a relatively short term impact that can be managed as much as practically possible through measures such as a Construction Management Plan (CMP) and control of construction hours. Construction related disturbance would be short term and it is not considered appropriate or reasonable to raise an objection to the proposal on the grounds of harm to neighbouring amenity from construction related activity.

Concerns regarding dust pollution have been duly considered. The applicant has submitted a Dust Management Plan which has been assessed by Environmental Health Officers and deemed to be acceptable.

Taking all of the above into account it is considered that whilst there will be additional activity resulting from the school operating at full capacity, the proposal is not considered to have a significantly harmful impact on the amenities of nearby residents and therefore the proposal is considered to be acceptable in this respect.

Sustainability

The NPPF requires Local Planning Authorities to adopt proactive strategies to mitigate and adapt to climate change. London Plan and Draft Local Plan Policies advocate the need for sustainable development. All new development should address climate change and reduce carbon emissions. For major development proposals there are a number of London Plan requirements in respect of energy assessments, reduction of carbon emissions, sustainable design and construction, decentralised and renewable energy. Major developments are expected to prepare an energy strategy based upon the Mayors energy hierarchy adopting lean, clean, green principles.

The applicants Energy Strategy was originally considered to be insufficient in terms of its content and conclusions. This issue was raised with the applicant and a further note was submitted.

The development does not comply with the London Plan requirements as the overall CO₂ reduction of 24% for the secondary school building would be significantly less than the 35% required by Policy 5.2 of the London Plan. The applicant was asked to address this matter further but has been unable to increase the CO₂ reduction for the secondary school which they attribute to the fact that there is limited roof space available for PV panels. This is extremely regrettable particularly as the development also fails to provide any living roofs which are contrary to London Plan Policy 5.11 which requires major development proposal to incorporate living roofs and walls where possible. It is possible for PV panels to be positioned on top of living roofs. Indeed the provision of living roofs below photo-voltaic panels optimises the efficiency of the PVs bringing additional sustainability benefits to the development. It is considered that the lack of a living roof is a missed opportunity to make a positive contribution in terms of SUDs, ecological benefits and visual amenity.

However, on balance taking account of the benefits of the scheme in meeting a demonstrable demand for education provision in the borough, Officers do not consider that a reason for refusal on the grounds of sustainability could be justified. However, it is necessary to ensure that 24% CO₂ reduction for the secondary school is secured by way of a condition to ensure that the development makes maximum provision towards addressing sustainability policies.

Other Considerations

Drainage, air quality and land contamination has been addressed by way of submission of technical reports which have been scrutinised by relevant consultees. Appropriate conditions are recommended in most respects.

Planning Obligations

The National Planning Policy Framework (NPPF) states that in dealing with planning applications, local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. It further states that where obligations are being sought or revised, local planning authorities should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled. The NPPF also sets out that planning obligations should only be secured when they meet the following three tests:

- (a) Necessary to make the development acceptable
- (b) Directly related to the development; and

(c) Fairly and reasonably related in scale and kind to the development

Paragraph 122 of the Community Infrastructure Levy Regulations (April 2010) puts the above three tests on a statutory basis. From 5th April 2015, the Council will need to link Education, Health and similar proposals to specific projects in the Borough.

In this instance because the replacement school buildings will allow the school to operate within existing capacity it is not considered that any obligations are necessary to mitigate the impact of development. Any necessary mitigation can be secured by way of conditions.

Environmental Impact Assessment

A formal screening opinion was issued under Regulation 5 on 10 April 2015 confirming that the development is not EIA development.

Summary

The proposed development of the site raises issues associated with the acceptability of the development in terms of its nature and scale, impact on the local environment and surrounding area. This report has considered those matters in the light of adopted and emerging development plan policies and other material considerations including third party representations.

As discussed in this report the redevelopment of this site in the nature proposed is considered to be a suitable form of development. The proposal would provide modern and rationalised buildings for an existing school, the building footprint would be significantly reduced improving the impact on the urban open space and preserving the character and appearance of the conservation area.

It is considered that the transport impacts arising can be adequately mitigated through the use of a travel plan and conditions.

Officers consider that, with the recommended mitigation and planning conditions in place the proposal represents an appropriate form of development that would not give rise to unacceptable harm to amenity and save for the lack of living roofs and proposed reduction in CO₂ emissions would largely meet development plan policy requirements.

As discussed throughout this report Development Plan Policies encourage new and expanding school facilities. Proposals for new schools, should be given positive consideration and should only be refused where there are demonstrable negative local impacts which substantially outweigh the desirability of establishing a new school and which cannot be addressed through the appropriate use of planning conditions or obligations. For the reasons demonstrated in this report and subject to the mitigation secured through conditions it is not considered that there are demonstrable negative local impacts that would substantially outweigh the benefits of the proposal.

Consequently it is considered that the proposal is acceptable subject to recommended conditions.

Background papers referred to during the production of this report comprise all correspondence on file ref 15/0908 and history files set out above, excluding exempt information.

RECOMMENDATION: PERMISSION

Subject to the following conditions:

1. A01 Commencement of Development
A01 Reason – 3 years

2. The temporary accommodation for the secondary school hereby approved shall be removed and the land restored to a condition as set out in the plans hereby approved on or before 31st December 2017.

Reason: In accordance with the application details as submitted and in order to ensure that the additional buildings are removed once the permanent school is available for occupation in the interests of restricting the amount of development on site and protecting the character and amenity of the area in accordance with Policy BE1 of the UDP (2006)

3. NS - The development hereby approved shall be carried out strictly in accordance with the application plans, drawings and documents as detailed below:

Plans Nos. 688-HABE-PL-002-00, 003-00, 004-00, 014-00, 015-00, 016-00, 017-00, 018-00, 019-00; 020-00, 021-00; 022-00, 023-00, D2279_P_L.100 and L.200, Kier Construction Management Plan, Air Quality Assessment, RPS Transport Assessment, Campbell Reith Drainage Impact Assessment, Van Zyl & De Villiers Ltd Energy Strategy, RPS Phase 1 Preliminary Risk Assessment and Phase 2 Environmental and Geotechnical Site Investigation Report, RPS Arboricultural Method Statement, RPS Updated Ecological Appraisal, Design and Access Statement Received 04 March 2015;

Plan Nos. 688-HABE-PL-001-00, 006--0, 007-00, 008-00, 009-00, 010-00, 011-00, 012-00, 013-00 Received 10 March 2015;

Plan No. 688-HABE-PL-025-01 Received 07 April 2015 and Kier Dust Management Plan Received 27 April 2015

Reason: To ensure that the development is carried out in accordance with the approved documents, plans and drawings submitted with the application and is acceptable to the local planning authority when judged against development plan policies in the London Plan 2015 and UDP 2006.

4. NS – (i) No demolition shall take place nor works to trees by way of felling or pruning until a survey has been carried out to ascertain the extent to which there is potential for roosting bats or nesting birds within the buildings, trees and hedgerows on site. If any potential is identified, details shall be submitted to and approved in writing by the local planning authority of the timing of the works and any necessary mitigation measures.

(ii) The works shall be carried out in full accordance with the approved timing and mitigation measures.

(iii) If any potential for roosting bats or nesting birds is identified works to trees and hedgerows shall only be undertaken between the months of November to February inclusive thus avoiding the potential to harm protected species.

Reason: In order to comply with Policy NE3 of the Unitary Development Plan and in order to safeguard the interests and well-being of bats and birds on the site which are specifically protected by the Wildlife and Countryside Act 1981 (as amended)

5. NS – (i) Above ground construction of the new buildings hereby approved shall not commence until a surface water drainage scheme for the site based on sustainable drainage principles, and an assessment of the hydrological and hydro geological context of the development has been submitted to, and approved by, the Local Planning Authority. The surface water drainage strategy should seek to implement a SUDS hierarchy that achieves reductions in surface water run-off rates to Greenfield rates in line with the Preferred Standard of the Mayor's London Plan.

(ii) The development insofar as it relates to each school building shall be implemented in full accordance with the details approved under Part (i) prior to any part of the relevant school building being brought into use.

Reason: To reduce the impact of flooding both to and from the proposed development and third parties in accordance with Policies 5.12 Flood Risk Management and 5.13 Sustainable Drainage of the London Plan (2015)

6. NS - (i) A detailed scheme of landscaping which shall include

- Details of bird and bat boxes
- Details of log piles
- Details of ecological improvements to the existing pond
- Details and samples of any hard surfaces (NB: No loose materials shall be used for surfacing of the parking and turning area hereby permitted)
- Full details of boundary treatments
- Proposed plant numbers, species, location and size of trees and tree pits,
- Furniture and lighting
- Details of the management and maintenance of the landscaping for a period of five years

shall be submitted to and approved in writing by the local planning authority prior to construction of any above ground works.

(ii) The approved landscaping scheme shall be implemented in full and all planting, seeding or turfing shall be carried out in the first planting and seeding seasons following the completion of the development, in accordance with the approved scheme under part (i). Any trees or plants which within a period of five years from the completion of the development die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species.

Reason: In order that the local planning authority may be satisfied as to the details of the proposal and to comply with Policies BE1, BE7, NE3, NE5 and NE7 of the UDP.

7. NS - Whilst the principles and installation of sustainable drainage schemes are to be encouraged, no infiltration of surface water drainage into the ground is permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approved details.

Reason: Infiltrating water has the potential to cause remobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of groundwater. Consequently it is necessary to prevent harm to human health and pollution of the environment in accordance with Policy ER7 of the Unitary Development Plan.

8. NS - Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: Piling or other penetrative methods of foundation design on contaminated sites can potentially result in unacceptable risks to underlying groundwaters. Where soil contamination is present, a risk assessment should be carried out in accordance with our Environment Agency guidance 'Piling into Contaminated Sites'. Piling is not permitted on parts of a site where an unacceptable risk is posed to controlled waters in accordance with Policy ER7 of the Unitary Development Plan.

9. The development shall be carried out in full accordance with the Construction Management and Dust Management Plans hereby approved.

Reason: In order that the local planning authority may be satisfied that the demolition and construction process is carried out in a manner which will minimise possible noise, disturbance and pollution to neighbouring properties and to ensure satisfactory vehicle management in accordance with Policies BE1 T5, T6, T7, T15, T16 & T18 of the Unitary Development Plan.

10. NS – The development hereby approved shall be carried out in strict accordance with the materials as submitted with this application. Namely Sto Silco 1.5mm white render, Kaweneer Aluminium AA0541 Fenestration (RAL 7016 Satin) and Ibstock Brunswick Buff Bricks.

Reason: In order to comply with Policy BE1 of the Unitary Development Plan and in the interest of the appearance of the building and the visual amenities of the area.

11. NS - Prior to the development hereby permitted being brought into use all parking and turning spaces hereby approved shall be completed in accordance with the approved details and thereafter shall be kept available at all times for such use and no permitted development whether permitted by the Town and Country Planning (General Permitted Development Order 1995 (or any Order amending, revoking and re-enacting this Order) or not shall be carried out on the land or garages indicated or in such a position as to preclude vehicular access to the said land or garages.

Reason: In order to comply with Policy T3 of the Unitary Development Plan and to avoid development without adequate parking or garage provision, which is likely to lead to parking inconvenient to other road users and would be detrimental to amenities and prejudicial to road safety.

12. While the development hereby permitted is being carried out a suitable hardstanding shall be provided with wash-down facilities for cleaning the wheels of vehicles and any accidental accumulation of mud of the highway caused by such vehicles shall be removed without delay and in no circumstances be left behind at the end of the working day.

Reason: In the interest of pedestrian and vehicular safety and in order to comply with Policy T18 of the Unitary Development Plan

13. NS - Before any part of the development hereby approved is first brought into use, bicycle parking shall be provided at the site in accordance with details hereby approved and shall be permanently retained thereafter.

Reason: In order to comply with Policy T7 and Appendix II.7 of the Unitary Development Plan and in order to provide adequate bicycle parking facilities at the site in the interest of reducing reliance on private car transport

14. NS - Prior to installation of any fixed noise generating plant an acoustic assessment shall be submitted to and approved by the Local Planning Authority to prevent adverse effects from plant noise on local amenity. Once approved the plant shall be installed as approved and permanently maintained thereafter.

Reason: In the interests of protecting residential amenity in accordance with Policy BE1 of the Unitary Development Plan.

15. NS – (i) Prior to any part of the development hereby approved being brought into use a scheme for any external lighting that is to be installed at the site (which for the avoidance of doubt shall not include any flood lighting for the MUGA which will be subject to a separate planning application), including measures to prevent light spillage shall be submitted to and approved in writing by the local planning authority.

(ii) Any such external lighting as approved under part (i) shall be installed in accordance with the approved drawings and such directional hoods shall be retained permanently.

(iii) The applicant should demonstrate that the proposed lighting is the minimum needed for security and working purposes and that the proposals minimise pollution from glare and spillage.

Reason: In order that the local planning authority may be satisfied that the lighting is installed and maintained in a manner which will minimise possible light pollution to the night sky and neighbouring properties and to comply with Policy BE1 of the UDP.

16. NS –(i) Before any of the school buildings hereby approved are first bought into use a Travel Plan shall be submitted to and approved in writing by the Local Planning Authority

(ii) The Travel Plan should include measures to promote and encourage the use of alternative modes of transport to the car and shall also include a timetable for the implementation of the proposed measures and details of the mechanisms for implementation and for annual monitoring and updating. The Travel Plan shall be implemented in accordance with the agreed timescale and details.

Reason: In order to ensure appropriate management of transport implications of the development and to accord with Policy T2 of the Unitary Development Plan

17._NS - The application site is located within an Air Quality Management Area declared for NOx: In order to minimise the impact of the development on local air quality any gas boilers must meet a dry NOx emission rate of <40mg/kWh

Reason: To minimise the effect of the development on local air quality within an Air Quality Management Area in line with NPPF p124 and Policy 7.14 of the London Plan.

18._An electric car charging point shall be provided to a minimum of 5 car parking spaces with passive provision of electric charging capacity provided to an additional 5 spaces.

Reason: To minimise the effect of the development on local air quality within an Air Quality Management Area in line with NPPF p124 and Policies 6.13 and 7.14 of the London Plan.

19. (i) The development hereby approved shall include the provision of Photovoltaic Panels on the roof of the secondary school building in order to achieve a minimum of 41,971kWh/annum in addition to the implementation of all measures set out in the Energy Strategy hereby approved, in order to ensure that the secondary school will achieve a minimum of 24% reduction in CO₂ below ADL2013.

(ii) Within 3 months of the first occupation of the building hereby approved evidence shall be submitted to the local planning authority to demonstrate that the photovoltaic panels have been installed on the building and the minimum kWh/annum set out in (i) can be achieved.

Reason: In order to ensure that the development can achieve the CO₂ reduction identified in the application submission and will meet the aims and objectives of London Plan Policy 5.2 and UDP Policy BE1 in respect of sustainable design and construction.

20. The Multi Use Games Area (MUGA) hereby approved shall only be used between the hours of 08:25 – 18:00 on any day Monday to Sunday inclusive.

Reason: In the interests of protecting neighbouring residential properties from activities that could result in excessive noise and disturbance outside of normal school hours and in accordance with Policy BE1 of the UDP (2006).

21. NS - Notwithstanding the Town and Country Planning (General Permitted Development) Order 2015 (or any Order revoking, re-enacting or modifying that Order), no plumbing or pipes, other than rainwater pipes, shall be fixed on the external elevations of the buildings hereby approved.

Reason: It is considered that such plumbing or pipes would seriously detract from the appearance of the building(s) and to comply with Policy BE1 in the Unitary Development Plan.

Informatives

1. D125 – Mayoral Community Infrastructure Levy

2. NS - Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. The applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site

drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0800 009 3921.

3. NS - Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

4. NS - Where a developer proposes to discharge groundwater into a public sewer, a groundwater discharge permit will be required. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Groundwater permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 8507 4890 or by emailing wwriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991.

5. NS - If during the works on site any suspected contamination is encountered, Environmental Health should be contacted immediately. The contamination shall be fully assessed and an appropriate remediation scheme submitted to the Local Authority for approval in writing.

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Agenda Item 6

Report No.
DRR15/075

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: DEVELOPMENT CONTROL COMMITTEE

Date: Monday 13th July 2015

Decision Type: Non-Urgent Non-Executive Non-Key

Title: LOCAL LIST OF VALIDATION REQUIREMENTS FOR PLANNING APPLICATIONS

Contact Officer: Gemma Usher, Deputy Development Control Manager
E-mail: gemma.usher@bromley.gov.uk

Chief Officer: Chief Planner

Ward: (All Wards);

1. Reason for report

National Government Guidance requires Local Planning Authorities to undertake a regular review of their validation requirements for planning applications. It is necessary to ensure that the list remains fit for purpose in the context of changes to National Legislation and development plan policies.

A revised local list was reported to DC Committee on 10th February 2015. Members agreed to the proposed revised list subject to some minor tweaks to wording and a period of public consultation on the revised list which is a statutory requirement before formally adopting any amendments.

A period of public consultation was undertaken for 8 weeks (13.04.2015 – 22.06.2015).

This report sets out the updated requirements taking account of the amendments requested at DC Committee on 10th February as well as addressing issues that arose as a result of public consultation and seeks Members agreement to formally adopt the updated document.

2. **RECOMMENDATION(S)**

Formally adopt the revised Local List of Validation Requirements.

Corporate Policy

1. Policy Status: Existing Policy:
 2. BBB Priority: Quality Environment:
-

Financial

1. Cost of proposal: No Cost:
 2. Ongoing costs: Not Applicable:
 3. Budget head/performance centre: Planning and Renewal
-

Staff

N/A

Legal

1. Legal Requirement: Statutory Requirement: Article 10 of the Town and Country Planning (Development Management Procedure) Order 2015
 2. Call-in: Not Applicable:
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): Users of planning service
-

Ward Councillor Views

1. Public consultation undertaken.
2. Summary of Ward Councillors comments: None received

3. COMMENTARY

On 8 October 2013 Members of the Development Control Committee agreed to adopt the Council's updated local list of validation requirements for planning applications. This list has been used since that time to ensure that planning applications are accompanied by all documentation necessary to ensure proper consideration, in addition to the basic documentation required by primary legislation.

The Town and Country Planning (Development Management Procedure) Order 2015 require the Local Planning Authority to review its local validation requirements every two years. However, it is open for a Local Planning Authority to review the requirements more frequently if necessary.

In the majority of cases agreement is easily reached with applicants regarding what is required to be submitted with an application, as officers use discretion to ask only for relevant documentation. The list predominantly provides guidance and help to those wishing to submit a planning application and explains why documents are required in certain circumstances. However, the legislation also introduced a right of appeal where an applicant disputes the necessity of a document required by the Authority. If such an appeal is submitted, the local validation document will provide the basic justification as to why the document was requested to help settle the dispute.

The review process for the local validation requirements is set out in National Planning Practice Guidance (2014). For the reasons set out above, the local list of validation requirements has been reviewed. As reported to the DC Committee on 10th February 2015 the review has led to minor changes to items already on the list by way of making requirements clearer for applicants and ensuring that the most up-to-date policies are referenced. The revised list also introduces some additional requirements for non-householder applications to ensure that proposals meet current legislative and policy requirements, are capable of delivering high quality design and addressing sustainability policies. Furthermore by requiring applicants to submit certain details as part of the planning application for major and/or complex and sensitive proposals it is possible to prevent the use of conditions requiring further submissions which will reduce timescales for implementing permissions as well as reducing pressure on workload and resources.

Public consultation was undertaken and only two representations were received. The first query related to whether the Council will make Financial Viability Assessments available for public view as part of the planning file. At present the Council do not make sensitive information such as this available for public view in general. However, such material may be open to public inspection as the Freedom of Information Act 2000 and Environmental Information Regulations 2004 apply. This has been explained in the relevant section of the document.

The second query related to whether the Council intend to use this document consistently to assess applications. It is confirmed that that once adopted this document will be used to determine whether applications are valid or not.

The following minor changes have been made to the attached document since formal consultation (the changes are highlighted in the attached)

- The Town and Country Planning (Development Management Procedure) Order 2015 came into effect on 15th April 2015
- Block/Site Plan – New development must be shown with written dimensions to boundaries (page 4)
- Wording amended in respect of the trigger for requesting documents. Wording amended from 'likely to be required for' to 'application trigger' (page 9 onwards)
- The Council has introduced a Commercial Property Database which should be used as part of a marketing strategy for vacant premises (page 22)

POLICY IMPLICATIONS

The continued ability to require applicants to submit additional material with applications will assist in assessing them against development plan policies and help to maintain the quality of decisions.

Non-Applicable Sections:	Financial; Legal; Personnel
Background Documents: (Access via Contact Officer)	Town and Country Planning (Development Management Procedure) Order 2015 National Planning Practice Guidance 2014



Validation Guidance and Local Information Requirements for Planning Applications

Introduction

Requirements for all planning applications

Standard application form including ownership certificates and agricultural land declaration (national requirement)
The correct fee (national requirement)
Site location plan (national requirement)
Site plan or block plan (national requirement)
Design and Access Statement
General guidance for drawings
Existing and proposed elevations, sections and floor plans
Existing and proposed site sections and finished floor levels
Existing and proposed roof plan
Existing site layout plan
Photographs of existing site
Advertisement drawing
Section 96a (Non-material) and 73 (Minor-material) Applications

Supporting documents required for common types of applications

Accommodation Schedule
Affordable Housing Statement
Air Quality Assessment
Biodiversity and Geological Survey and Report
Construction Logistics Plan
Daylight/Sunlight Assessment
Economic Statement
Energy Statement
Financial Viability Assessment
Flood Risk Assessment
Foul Sewage and Surface Water Drainage Assessment
Heritage Statement
Land Contamination Assessment
Landscaping Scheme
Landfill and Waste Transfer Statement
Landscape/Townscape and Views Impact Assessment
Lifetime Homes / Wheelchair Housing Statement
Lighting Assessment
Marketing Evidence
Noise and Vibration Impact Assessment
Parking Provision for Cars and Bicycles
Planning Obligations (s106 and Unilateral Undertaking Legal Agreements) – Draft Heads of Terms
Planning Statement
Refuse and Recycling Storage
Section Drawings and Levels
Statement of Community Involvement (SCI)
Structural Survey and Rebuilding Method Statement
Sustainability Statement
Telecommunication Development Information
Town Centre Uses and Retail Impact Assessment

Validation Guidance and Local Information Requirements for Planning Applications

Transport Assessment
Travel Plan
Tree Survey and Arboricultural Implications Report
Ventilation/Extraction Details and Specification

Introduction

The Growth and Infrastructure Act (2013) requires that Local Information Requirements must be:

- Reasonable having regard, in particular, to the nature and scale of the proposed development; and
- A matter that it is reasonable to think will be a material consideration in the determination of the application

This reflects the Town and Country Planning (Development Management Procedure) Order 2015 and Paragraph 193 of the National Planning Policy Framework (2012).

This document is provided to help ensure that you understand what we expect to receive with a planning application to make it valid and why. It also comprises the Council's local information requirements or local validation list.

The information required for a valid planning application consists of:

1. Mandatory national information requirements (set out in the Town and Country Planning (Development Management Procedure) Order 2015)
2. Information provided on the standard application form; and
3. Information to accompany the application as specified by the local planning authority on their local list of information requirements. **This document comprises the Council's local list of information requirements.**

The Council will only ask for what is required in order to determine the application. Each requirement has been tested against the Growth and Infrastructure Act and it is considered that the matters set out are reasonable having regard, in particular, to the nature and scale of the proposed development triggers and are matters that it is reasonable to think will be a material consideration in the determination of a planning application.

When received, all planning submissions will be reviewed against the requirements set out within the local list. The level of detail to be provided should always be proportionate to the scale of the development, however, the advice below sets out when such information is likely to be required and the **minimum** detail that all submissions will need to address in order for a submission to be valid.

If your application is made invalid due to lack of submission of any of the documents required by the Council which form part of our Local Validation Requirements, and you disagree with the requirement, you are encouraged to discuss your concerns with us initially. If we can't reach an agreement, there is a right of appeal – for information on the appeal process please refer to the website below

<http://www.planningportal.gov.uk/planning/appeals>

Validation Guidance and Local Information Requirements for Planning Applications

There are checklists provided for each application type on the Council's website at www.bromley.gov.uk/planningchecklists to help you make sure your application is valid and will be accepted.

For major applications (10+ dwellings of 1000sqm of floorspace there are additional requirements – highlighted in a blue text box for ease within this document.

Requirements for all planning applications

Standard application form including ownership certificates and agricultural land declaration (national requirement)

All applications for planning permission must include the appropriate standard application form fully completed and signed. The form includes appropriate certificate of ownership. An ownership certificate A, B, C or D must be completed stating the ownership of the property. **You should not sign more than one certificate as this will result in the application being invalid.** For this purpose an 'owner' is anyone with a freehold interest, or leasehold interest the unexpired term of which is not less than seven years.

Further advice on completing certificates and forms can be found at <http://www.planningportal.gov.uk/general/faq/faqonlineappsforms>

The agricultural land declaration must be completed for most applications to confirm whether the site includes an agricultural holding and ensure that any agricultural tenants. All forms must be signed and dated by or on behalf of the applicant.

Why is this needed?: The application form provides basic information required to register and assess the application and the declaration and certificates ensure that anyone with an interest in the application land is aware of the application.

The correct fee (national requirement)

All applications must be accompanied by the correct fee, or confirmation as to why no fee is provided where an exemption applies. You can check with the Council if you are unsure as to what fee applies (contact details at the end of this document). Payment can be made over the phone once the application has been submitted, by cheque at the time of making the application or online using the Planning Portal.

Why is this needed?: The government sets fees nationally to help Local Planning Authorities cover the cost of processing planning applications.

Site location plan (national requirement)

All applications must include 4 copies (unless submitted electronically) of a site location plan which should:

Validation Guidance and Local Information Requirements for Planning Applications

1. Be based on an up-to-date map.
2. At an identified standard metric scale (typically 1:1250 or 1:2500, but wherever possible the plan should be scaled to fit onto A4 or A3 size paper).
3. Identify sufficient roads and/or buildings on land adjoining the application site to ensure that the exact location of the application site is clear.
4. Show the application site edged clearly with a red line. The site must include all land necessary to carry out the proposed development – for example, land required for access to the site from a public highway, visibility splays, landscaping, car parking and open areas around buildings.
5. Show a blue line drawn around any other land owned by the applicant, close to or adjoining the application site.

Why is this needed?: To identify the land to which the application relates and any nearby land also in the control of the applicant

Site plan or block plan (national requirement)

All applications must include a site or block plan which should:

1. Be to an identified standard metric scale (normally 1:100, 1:200 or 1:500 but wherever possible the plan should be scaled to fit onto A4 or A3 size paper)
2. Show the direction of north, and the proposed development in relation to the site boundaries and other existing buildings on the site **with written dimensions to the boundaries.**

The plan should also include the following, unless these would not influence or be affected by the proposed development:

3. All buildings, roads and footpaths on land adjoining the site including access arrangements
4. All public rights of way crossing or adjoining the site
5. The position of all trees on the site, and those on adjacent land
6. The extent and type of any hard surfacing
7. Boundary treatment including walls or fencing where proposed

Why is this needed?: To ensure that the Council has sufficient information to understand how the development will relate to its surroundings and assess the impact of the proposal.

Design and access statement

The purpose of a Design and Access Statement is to provide a framework for applicants to explain how a proposed development is a suitable response to the site and its setting, and demonstrate that it can be adequately accessed by prospective users.

Statements are required only for the following applications (although it may be helpful to provide one to help justify other proposals such as for new dwellings)

- Planning applications for Major Development
- Applications in Conservation Area but only if for one or more dwellings or for building works with a floor space of over 100sqm

- Listed Building Consent

The statement should be proportionate to the scale of the development forming the basis of the application. The document should be very visual, using diagrams, sketches, plans and photographs to provide the necessary explanations and descriptions wherever possible and appropriate.

For major applications Design and Access Statements shall:

- Explain the design principles and concepts that have been applied to the development
- Demonstrate the steps taken to appraise the context of the development and how the design of the development takes that context into account
- Include all options considered in the evolution of a scheme with a clear explanation as to why other options were discounted
- Explain the policy adopted as to access
- Explain how any specific uses which might affect access to the development have been addressed

In addition for Outline Planning Applications where scale and/or layout are Reserved a Design and Access Statement must include details of the design approach and design intent for future Reserved Matters Applications.

For Listed Building or Conservation Area Applications reference must be made as to how the development will affect the heritage asset.

Why is this needed?: To ensure that the Council has sufficient information to understand what is proposed, how the development will relate to the existing situation and assess the impact of the proposal.

Drawings

General guidance for drawings

Drawings are preferred at A4 or A3, however where this is inappropriate larger drawings are acceptable. Drawings which say 'Do not scale' are not generally acceptable.

All drawings should include the following information:

- The scale of the drawing (e.g. 1:100, 1:200 – should be a metric scale).
- Indicate the direction of North on site location and block plans.
- A scale bar indicating a minimum of 0-10 metres (to assist with reading online).
- A title to identify the development and subject of the drawing
- A unique drawing number which also indicates any revisions
- All revisions should be described to identify any changes
- The date of the drawing and any changes made.
- Key external dimensions in metric.

Existing and proposed elevations and floor plans

Validation Guidance and Local Information Requirements for Planning Applications

Required for any new building work and certificates of lawfulness for proposed development (applications relating only to use require floor plans only) and should:

- Be at a scale of 1:50 or 1:100
- Only show existing or proposed development and not include any other proposed works, for example permitted development not yet carried out
- Include key written dimensions and a scale bar
- For applications for new buildings or substantial extensions to sensitive buildings, elevations and sections at 1:20 should be provided to show typical window sections, entrances and balconies. It may also be necessary to provide 1:5 details for important design features or at important junctions (further advice can be given during pre-application discussions).
- For Listed Building Consent applications 1:20 existing plans must be submitted to show all existing doors, windows, shop fronts, panelling, fireplaces, plaster moulding and other decorative details that are to be removed or altered and 1:20 proposed plans and sections to show all new doors, windows, shop fronts, panelling, fireplaces, plaster moulding and other decorative details

Why is this needed?: To ensure that the Council has sufficient information to understand what is proposed, how the development will relate to the existing situation and assess the impact of the proposal. Large scale plans and sections are required to demonstrate design detail and quality can be achieved in new buildings and/or sensitive extensions.

Existing and proposed site sections and finished floor levels

Normally required for any new building works for sites which slope or where a change in ground level is proposed and should:

- Be at a scale of 1:50 or 1:100
- Only show existing or proposed development and not include any other proposed works, for example permitted development not yet carried out
- Include key written dimensions and a scale bar

Why is this needed?: To ensure that the Council has sufficient information to understand what is proposed, how the development will relate to the existing situation and assess the impact of the proposal.

Section Drawings and Levels

Application trigger: Proposals that involve a change in levels and on sloping sites and tall buildings

Locations: Borough-wide

Such plans drawn at a scale of 1:50 or 1:100 should show cross sections through the proposed works, building(s) or extension(s). In all cases where a proposal involves a change in ground levels, illustrative drawings should be submitted to show both existing and finished levels, including details of foundations and eaves and how encroachment onto adjoining land is to be avoided.

Full information should also be submitted to demonstrate how proposed buildings relate to existing site levels and neighbouring development. Such plans should show existing site levels and finished floor levels (with levels related to a fixed datum point off site) and also show the proposals in relation to adjoining buildings.

Validation Guidance and Local Information Requirements for Planning Applications

In the case of householder development, the levels may be evident from floor plans and elevations, but particularly in the case of sloping sites it will be necessary to show how proposals relate to existing ground levels or where ground levels outside the extension would be modified. Levels should also be taken into account in the formulation of Design and Access Statements.

Existing and proposed street elevations

Normally required for any new building or proposals consisting of or including the increase in height of existing buildings and should:

- Be at a scale of 1:50 or 1:100
- Only show existing or proposed development and not include any other proposed works, for example permitted development not yet carried out
- Include key written dimensions and a scale bar
- Should show at least the property either side of the proposed development with clearly identifiable boundary lines

Why is this needed?: To ensure that the Council has sufficient information to understand what is proposed, how the development will relate to the existing situation and assess the impact of the proposal.

Existing and proposed roof plan

Normally required for building works where any changes to the roof of the building are not evident from the elevations and should:

- Be at a scale of 1:50 or 1:100
- Only show existing or proposed development and not include any other proposed works, for example permitted development not yet carried out
- Include key written dimensions and a scale bar
- Where a living/green/brown roof is proposed to address climate change policies it will be necessary to provide full details (see living roof section below).

Why is this needed?: To ensure that the Council has sufficient information to understand what is proposed, how the development will relate to the existing situation and assess the impact of the proposal.

Existing site layout plan

Normally required for certificates of lawfulness for an existing use and should:

- Be at a scale of 1:50, 1:100 or 1:200
- Include key written dimensions and a scale bar
- Show the precise area for each existing use

Why is this needed?: To set out what is being sought in the application and ensure that the Council has sufficient information to assess the lawfulness of the use.

Photographs of existing site

Whilst photographs are not required to validate an application, it is very helpful for photographs of the existing site and building(s) to be submitted in particular with listed building consent and conservation area consent applications and for major applications.

Whilst not a substitute for scaled plans, for major applications Computer Generated Images (CGIs) are very useful to demonstrate the visual impact of a proposal particularly for third parties who wish to comment on an application. In some instances Fully Verified Views will also be required. Further advice can be given by planning officers as part of the pre-application discussions.

Why is this needed?: It is helpful for consultees to be able to see the existing site (and where relevant visual images of the proposed development in its context) at an early stage in the application process as they are normally consulted before a site visit is carried out.

Advertisement drawings

Required for applications for advertisement consent showing advertisement size, siting, materials and colours to be used, height above ground, extent of projection and details of the method and colour(s) of illumination if applicable and should:

- Be at a scale of at 1:50 or 1:100
- Include written dimensions and a scale bar

Why is this needed?: To enable the Council to consider the impact of the advertisement

Section 96a (Non-material) and Section 73 (Minor-material) Amendments

Required for any application seeking amendments to an existing planning permission:

- Proposed plans, elevations and sections that meet the requirements set out above
- Copies of the approved plans marked up to show where the changes are for information purposes (the copies can be to A3 size even if the originals were larger).
- The proposed plans must be a full update/revision of that originally approved including all information originally shown on the plans that is not subject to change as well as the amendments sought (i.e. you cannot partially supersede a plan)
- A full schedule of originally approved and proposed replacement plans must be provided. The schedule must explicitly state which of the original plans is to be superseded by the proposed amendments.

Submission of Applications

Applications can be submitted electronically via the planning portal or in paper copy. When paper copies are submitted it is necessary to provide 4 copies of all plans and documents.

Whilst it is appropriate for householder and minor applications to be submitted electronically major applications are often accompanied by a number of large sized plans and range of technical supporting documents, which cannot be adequately assessed electronically. To prevent delays with validation and to assist with a more efficient assessment all major applications should be submitted in hard copy with a minimum of 4 paper copies and a disk (even if also submitted via the planning portal)

Supporting documents required for common types of applications

Validation Guidance and Local Information Requirements for Planning Applications

Supporting documents are most frequently required with applications for larger or more complex developments rather than householder extensions and are required to help explain the impacts of the proposal. In addition to the guidance in this document, the need for such further information can also be identified at pre-application meetings with Council planning officers, for which there is a charge.

The information submitted should provide material to enable the Council to assess the specific relevant impacts of the proposed development and put forward mitigation measures in relation to the effects identified. Material should also be provided to justify the proposal in relation to specific planning policies.

As a general rule it is suggested that the documents required for a planning or other application be prepared by a professional in the relevant field. If the Council finds during processing an application that the material included in a submitted document does not address the relevant issues, permission / consent may be refused on grounds of inadequate information.

Supporting documents that the Council may, at its discretion, require to be submitted for particular types of application are set out in the following section. The list is alphabetical and each item includes a summary of the relevant policies and the type of application and area of the Borough for which the item is likely to be required. There is also a detailed explanation of the expected content, reasons for requiring the item and where to look for further information.

Accommodation Schedule

Relevant policies: UDP Policies H1 Housing Supply, H2 & H3 Affordable Housing; London Plan Housing Policies 3.3, 3.4, 3.8, 3.10, 3.11, 3.12 and 3.13; Mayor's Housing SPD: Housing (2012); NPPF (2012) and NPG (2014)

Application trigger: All developments proposing new residential dwellings

Locations: Borough-wide

This document is required to demonstrate how the proposal will meet National Planning Legislation and Guidance and development plan policies in terms of housing provision, unit size and mix, affordable housing, standard of accommodation and density

The accommodation schedule must be submitted as a standalone document (not included within any other supporting statement) and must include the following details:

- Existing floor space Gross and Net (broken down into occupied and vacant floorspace at the time the application is submitted)
- Gross proposed floorspace
- Proposed unit numbers (broken down into size and tenure)
- Proposed habitable rooms
- Confirmation of unit sizes for each new dwelling
- Confirmation of residential density by unit number and habitable rooms
- Identified wheelchair units

For development proposals that trigger an affordable housing requirement it will also be necessary to provide a full Affordable Housing Statement (see below). If as part of the application, you are seeking to benefit from Vacant Building Credit it will be necessary to demonstrate that all existing floorspace within each building is vacant on the day that the application is submitted.

Affordable Housing Statement

Relevant policies: UDP Policies H2 & H3 Affordable Housing; London Plan Housing Policies 3.10, 3.11, 3.12 and 3.13; Mayor's Housing SPD: Housing (2012); NPPF (2012) and NPG (2014)

Validation Guidance and Local Information Requirements for Planning Applications

Application trigger: Residential developments of 11 or more dwellings or site area exceeding 0.4 hectares

Locations: Borough-wide

This will be required for all residential developments of 11 or more dwellings and residential proposals with a combined floorspace of 1000 sqm. Policy H2 of the UDP requires that 35% of the habitable rooms in such developments be affordable, comprising 70% social-rented and 30% intermediate housing, also 35% of the affordable housing should be family accommodation.

The Statement should include the number and mix of dwellings, with the numbers of habitable rooms and/or bedrooms, or the floor space of habitable areas of residential units, plans showing the location of units and their number of habitable rooms and/or bedrooms, and/or the floor space of the units. If different levels or types of affordability or tenure are proposed for different units this should be clearly and fully explained. The affordable housing statement should also include details of any Registered Provider acting as partners in the development. A planning obligation will be necessary to secure the provision of affordable housing.

All Affordable Housing should meet the current Homes and Communities Agency (HCA) Quality Standards and 10% should meet the South East London Housing Partnership Wheelchair Design Guide Standards – see Lifetimes Homes / Wheelchair Housing Statement below. See also Planning Obligations – Draft Head(s) of Terms below.

Useful references: Bromley Affordable Housing Supplementary Planning Document (SPD)
http://www.bromley.gov.uk/download/downloads/id/197/adopted_affordable_housing_spd

Air Quality Assessment

Relevant policies: London Plan Climate Changes Policies 5.1, 5.2 and 7.14 Improving Air Quality; NPPF (2012); NPG (2014)

Application trigger: Major developments and other potentially polluting & traffic generating development

Locations: Air Quality Management Areas (AQMA) and adjacent to them

This will be required for major developments and other potentially polluting and traffic-generating developments in or adjacent to the AQMA. The information should be sufficient to enable full consideration of the impact of the proposal on the air quality of the area. Where increased building and/or transport emissions are likely, reduction/mitigation measures should be set out in a detailed emissions statement.

Useful references: Bromley AQMA Map
http://www.bromley.gov.uk/downloads/file/682/bromley_air_quality_management_area_aqma_map

Biodiversity and Geological Survey and Report

Relevant policies: UDP Policies NE1, 2, 5 and 6 Nature Conservation and Development, Protected Species and World Heritage Site; Bromley Biodiversity Action Plan; London Plan Policies 7.19 Biodiversity and Nature Conservation and 7.20 Geological Conservation; NPPF (2012); Countryside / Wildlife Acts and related legislation

Application trigger: Major developments; Non-Major Developments in relevant locations; Hedgerow Removal

Locations: Within or adjacent to Site of Special Scientific Interest (SSSI), Local Nature Reserve (LNR), Site of Interest for Nature Conservation (SINC), Kent Downs Area of Outstanding Natural Beauty (AONB), and where protected species may be present on or adjacent to the site.

Validation Guidance and Local Information Requirements for Planning Applications

Developments within and adjacent to designated sites (Sites of Special Scientific Interest, Local Nature Reserves, Sites of Importance for Nature Conservation, the proposed World Heritage Site, Kent Downs Area of Outstanding Natural Beauty and Regionally Important Geological Sites) will need to be accompanied by such survey/report material.

Where a proposed development may have possible impacts on wildlife and biodiversity, information should be provided on existing biodiversity interests and possible impacts on them to allow full consideration of those impacts. Where proposals are being made for mitigation and / or compensation measures, information to support those proposals will be needed. Where appropriate, accompanying plans should indicate any significant wildlife habitats or features and the location of habitats of any species protected under the Wildlife and Countryside Act 1981, the Conservation (Natural Habitats etc) Regulations 1994 or the Protection of Badgers Act 1992.

Applications for development in the countryside that will affect areas designated for their biodiversity interests are likely to need to include assessments of impacts and proposals for long term maintenance and management. This information might form part of an Environmental Statement, where one is necessary. Certain proposals which include work such as the demolition of older buildings or roof spaces, floodlighting, removal of trees, scrub, hedgerows or alterations to water courses may affect protected species and will need to provide information about them, any potential impacts on them and any mitigation proposals for such impacts.

Useful references: See <http://www.biodiversityplanningtoolkit.com>; , www.naturalengland.org.uk and the Bromley Biodiversity Action Plan <http://www.bromley.org/ciswebpl/bbap/introbio.asp>

Construction Logistics Plan (CLP)

Relevant policies: UDP Policies T2 Assessment of Transport Effects, Policy T15 Traffic Management, T6 Traffic Management and Sensitive Environments, T18 Road Safety and London Plan Policy 6.14 Freight.

Application trigger: All major applications and others likely to have a significant impact on traffic congestion or pedestrian safety. Any application where loading activities associated with the construction phase of a development would cause congestion or obstruction on the highway.

Locations: Borough-wide

CLPs help to manage all types of freight movement to and from construction sites. They improve the safety and reliability of deliveries to a site, reduce congestion and minimise environmental impact. A CLP may be included within a Transport Assessment.

Depending on the scale of the development or particular sensitivities of the site the following information may be needed for an application to be determined:

- Construction vehicle routing (swept path analysis may be required) to demonstrate that construction vehicles can access the development and to limit or prevent HGV movements on residential roads
- Details for maintaining clean roads (wheel washing)
- Security and Access Controls (for larger sites)
- Details of waste management
- Numbers and times of deliveries

You are advised to speak to the Highways Team at an early stage to discuss your scheme and to agree the necessary scope of the application.

Further guidance can be found at

http://www.tfl.gov.uk/microsites/freight/documents/construction_logistics_plans.pdf

Daylight/Sunlight Assessment

Relevant policies: UDP Policy BE1 Design of New Development, NE1, 2 and 5 Nature Conservation and Development, Protected Species and Policy 7.7 Location and Design of Tall and Large Buildings

Application trigger: All major developments and any application where there is a potential adverse impact upon the current levels of sunlight/daylight enjoyed by adjoining properties or buildings including associated gardens or amenity space or in the vicinity of a river or open space

Locations: Borough-wide

A Daylight / Sunlight Assessment may be required for major developments, particularly in town centres, in circumstances where there is a potential adverse impact upon the current levels of sunlight / daylight enjoyed by adjoining properties or buildings, including associated gardens or amenity space or upon areas of public open space or rivers. An Assessment may also be required in situations where the application site itself is subject to potential adverse impact from adjoining buildings or features or where one part of the development is affected by another part of the same development. However the impacts of most developments on the amenities of adjoining and nearby properties will continue to be assessed on a case-by-case basis on their individual merits, without the need for a Daylight / Sunlight Assessment.

The assessment should be carried out in accordance with the Building Research Establishment document Site Layout Planning for Daylight and Sunlight – A guide to Good Practice. A daylight, vertical sky components, sunlight availability and shadow study should be undertaken and assessed against the criteria set out in the BRE document.

Useful references: Building Research Establishment <http://www.bre.co.uk/index.jsp>

Economic Statement

Relevant policies: UDP Policies EMP1, 4, 5 & 7 Office & Business Development and London Plan Economic Policies 4.1, 4.2, 4.3 and 4.4

Application trigger: Major developments >2000 sq m or >1ha; Redevelopments where loss of employment may arise

Locations: Borough-wide; Business Areas; Town / District Centres; Biggin Hill Airfield, applications that propose loss or creation of employment floorspace

The statement should set out any regeneration benefits from the proposed development, including: details of any new jobs that might be created or supported: the relative floor space totals for each proposed use (where known), any community benefits and reference to any regeneration strategies that might lie behind or be supported by the proposal. Proposals for redevelopment of employment sites should include details of existing employment that will be lost. The statement should include justification for the proposal in planning policy terms.

Energy Statement

Relevant policies: London Plan Climate Change Policies 5.1, 5.2, 5.3, 5.4, 5.5, 5.6 and 5.7; NPPF (2012) and NPG (2014)

Application trigger: Major developments

Locations: Borough-wide

The London Plan provides the policy framework in respect of sustainable construction and renewable energy, and attention is drawn to Chapter 5 of the London Plan and the Supplementary Planning Guidance entitled Sustainable Design and Construction

www.london.gov.uk/thelondonplan/guides/spg/spg_04.jsp - this document provides an example of a report format for an Energy Statement that is relevant and comprehensive.

The Statement should include an energy assessment which shows how the need for energy is to be minimised, and how it will be supplied. In accordance with the energy hierarchy, developments should firstly be designed to use less energy; secondly the energy needed should be supplied as efficiently as possible and thirdly should use renewable energy where feasible. The Energy Statement should show how building construction will provide energy efficiency savings that exceed the requirements of the Building Regulations and should include calculations of both carbon dioxide emissions and energy (in kWh) and show how options for producing renewable energy have been considered.

To comply with LP Policy 5.2 the development should provide at least a 40% reduction in carbon dioxide emissions (improvement on 2015 Building Regulations) through the energy efficient design of buildings, use of decentralised energy and then from onsite renewable energy generating technology. If a reduction of 40% carbon dioxide emissions on site is not feasible, the energy statement should explain why and any shortfall will be met through a cash in lieu contribution .

The Energy Statement should be related to the particular development proposed for the site and should demonstrate the feasibility of installing the particular measures proposed. The layout of the scheme should ensure that there is sufficient space on site for any equipment and fuel storage, if required, and should investigate implications of fuel delivery. The potential site and form of buildings and flues should be included in the information submitted with the application.

In cases where the form of renewable energy cannot be fully determined at time of application, feasible options must still be presented. It is unlikely to be possible to submit details for the compliance of a condition regarding energy efficient/renewable energy where additional permissions may be required (e.g. for flues or buildings not in the original application).

Useful references: <https://www.london.gov.uk/priorities/environment/tackling-climate-change>

Financial Viability Assessment

Relevant policies: UDP Policies H1 Housing Supply, H2 & H3 Affordable Housing, IMP1 Planning obligations and SPD Planning Obligations; London Plan Housing Policies 3.3, 3.4, 3.8, 3.10, 3.11, 3.12 and 3.13, Policy 8.2 Planning Obligations and 8.3 Community Infrastructure Levy; NPPF (2012) and NPG (2014)

Application trigger: Major development proposals and residential developments (11 + dwellings or site area of 0.4 hectares) that do not offer policy compliant planning obligations or less than 35% affordable housing (by Habitable room)

Locations: Borough-wide

A Financial Viability Assessment (FVA) will be required for any development that generates a need for developer contributions where the applicant is of the view that the economics of the development cannot support the likely requirements for contributions made by the Local Planning Authority or other stakeholders.

The Council will seek to enter into legal agreements under Section 106 regarding developments which trigger the threshold for planning obligations and affordable housing, in accordance with Government guidance and its Supplementary Planning Document (SPD) regarding Planning Obligations

http://www.bromley.gov.uk/info/856/local_development_framework/160/planning_obligations_supplementary_planning_document

When applicants are not able to offer such obligations (or less benefit than indicated by the SPD), this should be justified by such an Assessment. This requirement also applies where less or no affordable housing than is required by Policy H2 is included in a residential development of 11, or when public subsidy is sought for the affordable housing (SPD Planning Obligations paragraphs 2.16. and 3.2 refer).

The Assessment should set out in detail the costs of carrying out a development and the anticipated return on that investment. The purpose of the Assessment will be to allow the Local Planning Authority to have a clear understanding of the economics of development a particular site, and will be used to assess whether or not a development is able to meet the full requirements for planning obligations normally required.

The Viability Assessment should be in the form of a fully detailed land appraisal including reference to the scheme revenue and sales values. Details should also include the full costs of carrying out the development including for example land cost, construction costs, fees and the costs of the various contributions thought likely to be required (e.g. for community infrastructure, off site highway works etc). Viability information should be set out using Argus software (or other software as agreed with the Council in writing prior to submission) and must include a scheme layout plan and Land Registry Plan with a Statement of Ownership.

Such material may be submitted on a commercial and confidential basis. However, it may become open to public inspection as the Freedom of Information Act 2000 and Environmental Information Regulations 2004 apply. The Council will require the applicant to pay for an RICS certified consultant / organisation to be commissioned to independently appraise the FVA in order to assist the Council in processing the application.

See Planning Obligations – Head(s) of Terms below.

Flood Risk Assessment

Relevant policies: London Plan Policies 5.12 Flood Risk Management and 5.13 Sustainable Drainage.; NPPF (2012); NPG (2014)

Application trigger: Sites of 1ha or more in Flood Zone 1 and any development in Flood Zones 2 & 3, except “minor development” as defined by Environment Agency

Environment Agency Guidance defines Flood Zones as follows-

Zone 1 – low probability of flooding (less than 1 in 1000 annual probability of river or sea flooding)

Zone 2 – medium probability – between 1 in 100 and 1 in 1000

Zone 3 – high probability – 1 in 100 or greater annual probability

A Flood Risk Assessment (FRA) will be required for development proposals of 1 hectare or greater in Flood Zone 1 and for all proposals for new development located in Flood Zones 2 and 3 as designated by the Environment Agency. It is a statutory requirement that such proposals be referred to the Agency, with the exception of “minor developments” (domestic extensions and garden buildings, and non-domestic extensions of <250m²).

The FRA should identify and assess the risks of all forms of flooding to and from the development and demonstrate how these flood risks will be managed, taking climate change into account. The FRA should identify opportunities to reduce the probability and consequences of flooding. The FRA should include the design of surface water management systems including Sustainable Drainage Systems (SUDs) and address the requirements for safe access to and from the development in areas at risk of flooding. It should be prepared with reference to the Council’s Strategic Flood Risk

Assessment (SFRA).

Though an FRA will not be required for “minor development” in Zones 2 and 3, flood resistance and resilience measures may be required and a condition will be imposed on planning permissions granted for such extensions. See Foul Sewage and Surface Water Drainage Assessment below.

Useful references: Environment Agency flood risk guidance <http://www.environment-agency.gov.uk/research/planning/82587.aspx>

Foul Sewage and Surface Water Drainage Assessment

Relevant policies: London Plan Policies 5.15 Water Quality and Wastewater Infrastructure, 5.15 Water Use and Supplies and 5.16 Water Self-Sufficiency

Application trigger: Developments that will increase surface water runoff and/or result in increased demand for sewerage and sewage treatment; Sites traversed by public sewers

Locations: Borough-wide

Most new developments need to be connected to existing utilities, particularly to mains foul drainage and (if on-site filtration like soakaways is not feasible) to the mains surface water sewer. Particular issues arise if there are existing sewers crossing a development site, as the proposal will need to take such infrastructure into account, including possible diversion, and the Assessment should put forward suitable proposals if this is necessary.

Proposals for disposal of surface water should be in line with the criteria set out in London Plan Policy 5.15, using the principles of Sustainable Drainage Systems (SUDS) to reduce and attenuate run-off from the proposal so that the development does not exacerbate the risk of flooding elsewhere. The use of soakaways is desirable where ground conditions are suitable, and this should be evidenced by percolation tests. The proposals for on-site infrastructure should show service routes that avoid as far as possible the potential for damage to trees and archaeological remains.

See Flood Risk Assessment above, and Tree Survey and Arboricultural Implications Report below.

Useful references: <http://www.thameswater.co.uk/home/11425.htm>

Heritage Statement

Relevant policies: UDP Chapter 6 Conservation & the Built Environment, in particular Policies BE8 – 16; NPPF (2012)

Application trigger: Planning applications in Conservations Areas, and affecting the setting of a Listed Building Conservation Area Consent; Listed Building Consent; Scheduled Ancient Monument Consent; Hedgerow Removal

Locations: Conservation Areas; Listed Buildings; Historic Parks & Gardens; Scheduled Ancient Monuments; Areas of Archaeological Significance

The scope and degree of detail necessary in a Heritage Statement will vary according to the particular circumstances of each application. Applicants are advised to discuss proposals with the conservation officer before any application is made. Pre-application advice relating only to heritage matters is currently not subject to a fee. The following is a guide to the information that may be required for different types of application:

One way of setting out a Heritage Statement is to assess the significance of the “heritage asset” the subject of the application in terms of the building or feature concerned (that part specifically affected by the proposal and the whole building / feature) and its site and setting, under the following

headings –

- historic significance – the age and history of the asset, its development over time, the strength of its tie to a particular architectural period, the layout of the site, the plan form of a building, and internal features of special character
- cultural significance – the role a site plays in a historic setting, village, town or landscape context, the use of a building perhaps tied to a local industry or agriculture, social connections of an original architect or owner
- aesthetic / architectural significance – the visual qualities and characteristics of the asset (settlement site or building), long views, legibility of building form, character of elevations, roofscape, materials and fabric, special features of interest
- archaeological significance – evolution of the asset, phases of development over different periods, important features, evidence in building fabric, potential for below ground remains.

For applications for listed building consent, a written statement that includes a schedule of works to the listed building(s), an analysis of the significance of archaeology, history and character of the building/structure, the principles of and justification for the proposed works and their impact on the special character of the listed building or structure, its setting and the setting of adjacent listed buildings may be required. When photographs are necessary they should be dated, numbered and cross-referenced to a plan. Perspectives, photomontages, models or computer visualisations may be helpful to show the impact of new works on the heritage asset and its setting.

Plans for listed building consent should usually be at 1:50 scale and show existing and proposed floor plans, internal and external elevations, and sections through affected floor, roof and wall structures. A structural survey by an engineer or surveyor familiar with historic buildings which identifies defects and proposes remedies is likely to be required in support of an application for listed building consent, when significant elements of demolition or rebuilding are proposed. When partial or complete demolition is proposed, a statement of justification should be based on the following criteria – the condition of the building, cost of repairing and maintaining it in relation to its importance and the value derived from its continued use, adequacy of efforts to retain the building in use (including evidence that it has been offered on the open market at a realistic price) and merits of alternative proposals for the site.

For applications for conservation area consent, a written statement that includes a structural survey, an analysis of the character and appearance of the building/structure, the principles of and justification for the proposed demolition and its impact on the special character of the area may be required.

For applications either related to or impacting on the setting of heritage assets a written statement that includes plans showing historic features that may exist on or adjacent to the application site including listed buildings and structures, historic parks and gardens and scheduled ancient monuments and an analysis of the significance of the archaeology, history and character of the building/structure, the principles of and justification for the proposed works and their impact on the special character of a listed building or structure, its setting and the setting of adjacent listed buildings may be required.

For applications within or adjacent to a conservation area, an assessment of the impact of the development on the character and appearance of the area may be required, to assist the Local Planning Authority in determining whether the proposal preserves or enhances the character and appearance of the conservation area.

For all applications involving the disturbance of ground within an Area of Archaeological Significance in the Unitary Development Plan and on sites >0.4ha, an desktop Archaeological Assessment is required.

It is suggested that the Heritage Statement be prepared by a professional with experience of working with historic structures and features. Descriptive information about the heritage asset should include photographs of the site and its surroundings, so that the context of the proposal can be understood. See also Landscape and Assessment Views impact below.

Useful references: Advice can be found on the joint English Heritage CABE website Building in Context (www.building-in-context.org)

Land Contamination Assessment

Relevant policies: UDP Policy ER7 Contaminated land; London Plan Policy 5.21 Contaminated Land; NPPF (2012) and National Planning Policy for Waste (2014)

Application trigger: Any redevelopment in relevant locations, in particular where the proposed use is sensitive eg residential, schools or where the previous use of land could give rise to contamination

Locations: Borough-wide - On and near former landfill sites; Sites that have a history of commercial use or where previous uses are unknown

This should comprise a desktop study setting out the previous uses of the site. Sufficient information should be provided to determine the existence or otherwise of contamination, its nature and the risks it may pose and whether these can be satisfactorily reduced to an acceptable level. Where contamination is known or suspected or the proposed use would be particularly sensitive (e.g. residential, children's nursery, school), the applicant should provide such information with the application as is necessary to determine whether the proposed development can proceed. If permission is granted, a condition will be imposed requiring submission of a contaminated land assessment (comprising sampling of soil, gas, surface water and groundwater) and details of proposed remediation works.

Useful references: Further advice on contaminated land can be found on the Environment Agency's website www.environment-agency.gov.uk/research/planning/40407.aspx And in Bromley's Contaminated Land Strategy http://www.bromley.gov.uk/info/418/pollution_control-contaminated_land/558/contaminated_land.

Landscaping Scheme

Relevant policies: UDP Policy BE1 Design of New Development, BE7 Boundary Walls and Other Means of Enclosure, Policy NE7 Trees; London Plan Policy 7.1 Building London's Neighbourhoods and Communities, 7.4 Local Character and 7.5 Public Realm.

Application trigger: All new build residential development, developments that include external amenity space and any proposals including alterations to a front garden

Locations: Borough-wide

Landscaping schemes are integral to good design and should be incorporated into schemes from the earliest stage of the design process. Good landscaping and trees designed in as a positive part of the design process can add amenity value to a development and the public realm as well as benefiting wildlife habitats and biodiversity.

The detail provided should be proportionate to the scale of the development. At the outset of a proposal areas for hard surfaces, soft landscaping, playspace etc... should be identified even if detailed soft planting specification is not yet known.

The landscaping scheme should include plans showing details of hard and soft landscaping proposals for all parts of the site where no buildings are proposed. This must indicate the relevant site features and note those to be retained and the presence of any species of nature conservation interest;

- Proposed plans must specify the plant species, their size and planting densities and any trees proposed stating their size and identify hard landscaping materials;
- Site levels, gradients and any earthworks required, storage areas for bicycles and/or refuse storage areas, boundary treatments and SUDs must be shown as relevant; and
- A management plan for a period of 5 years identifying how and by whom any communal landscaping or public realm areas would be managed.
- Applications proposing **hardstandings** must specify the location and area of porous paving materials if proposed.

Living Roof and Wall Details

Relevant policies: London Plan Policies 5.10 Urban Greening, 5.11 Green Roofs and Development Site Environs, 5.12 Flood Risk Management, 5.13 Sustainable Drainage; NPPF (2012)

Application trigger: All proposals that are seeking to include living roofs and walls as a way to address climate change policies

Locations: Borough-wide

Living roofs are an essential sustainable design consideration and can make a significant contribution to flood mitigation and climate change particularly when paired with other renewable energy sources such as PV panels. However, it is essential to ensure that a living roof has been design into a building from the outset and that appropriate maintenance is secured to ensure its success.

For applications proposing the incorporation of a living roof the following information must be provided

- Fully detailed plans (to scale) showing and stating the area of the roof. This should include any contoured information depicting the extensive substrate build up and details of how the roof has been designed to accommodate any plant, management arrangements, and any proposed photovoltaic panels and fixings.
- A scaled section through the actual roof (i.e. not a generic section of a living roof) showing the details of the extensive substrate base and living roof components.
- Details of the proposed plug planting and seed composition and planting methodology
- Details of the proposed plug plant and seed composition.
- A statement outlining a management strategy detailing how the living roof would be maintained and monitored for a period of at least 5 years post installation shall be provided.

Useful references: <http://livingroofs.org/>

Landfill and Waste Transfer Statement

Relevant policies: UDP Policy ER2 Waste management facilities; London Plan Policy 5.16 Waste Self-Sufficiency, 5.17 Waste Capacity, 5.19 Hazardous Waste, the Mayor's Waste Strategy and National Planning Policy for Waste (2014).

Application trigger: All proposals for transfer, treatment and deposit of waste

Locations: Borough-wide

This guidance applies to applications for all types of waste management and waste transfer facilities and proposals for landfill or re-contouring land with refuse or waste materials.

Validation Guidance and Local Information Requirements for Planning Applications

The Statement should supplement an application with the following information:

- details of the type of waste to be deposited or transferred, including source of input and destination of output, tonnage and expected duration of the landfill / waste management operation. Where relevant, a topographical survey including
- existing and proposed levels / contours and cross sections, showing relationship with adjacent land
- detailed technical information relating to the plant and equipment proposed for the site and a method statement for the processes involved, including on-site procedures / machinery and a phasing programme
- detailed assessment of the impact of the proposed processes in terms of surface water runoff, air quality, noise, vibration, odour, dust, gas, leachate and energy produced, attraction of birds and vermin and measures to mitigate these impacts (including the plant and equipment concerned). Effects assessed should include hydrology / geology / groundwater and risks of flooding, subsidence, landslides or avalanches on landfill sites
- details of the visual impact of all buildings, plant and structures including information relating to land levels, screening and landscaping, if necessary – see Landscape / Townscape and Views Impact Assessment
- details of all vehicular movements to and from the site, based on the maximum capacity of the site, including vehicle size, frequency of movements and load capacity – see also Transport Assessment
- details of proposed restoration works, landscaping and aftercare, including timing / phasing.

Details of any relevant information relating to the requirements of the Environment Agency should also be included in the Statement. In the case of applications for landfill sites, sufficient information should be provided in the Statement to enable the waste planning authority to fulfil its requirements under the Landfill (England and Wales) Regulations 2002.

If the application site lies within the Green Belt or on Metropolitan Open Land, a Planning Statement (see below) setting out details of 'very special circumstances' should be submitted, and it should also include an assessment of alternative sites to demonstrate the need for the development on designated land.

Separate statements may also be required in the form of a Flood Risk Assessment and / or Foul Sewage and Surface Water Drainage Assessment (see above). Pre-application discussions are recommended on all proposals in this category to ensure that individual site requirements can be identified and addressed in the Statement and other documents that may be required.

Useful references: National Planning Policy for Waste (2014) and PPG (2014)

Landscape/Townscape and Views Impact Assessment

Relevant policies: UDP Policies in Chapters 6 Conservation and the Built Environment, Chapter 8 Green Belt and open space; Bromley Town Centre AAP Policy BTC19 Building height; London Plan Policies 7.1 Buildings London's Neighbourhoods and Communities, 7.4 Local Character, 7.6 Architecture and 7.7 Location and Design of Tall and large Buildings. Kent Downs AONB Management Plan Policies incl LLC Policies Landscape and landform character

Application trigger: Development that may affect the openness of protected open spaces, important local views, or views of landmarks or major skyline ridges. Proposals for tall buildings

Validation Guidance and Local Information Requirements for Planning Applications

Locations: Borough-wide including Areas of Special Character; Town Centres, Conservation Areas, Historic Parks and Gardens, Green Belt / MOL, Urban Open Space, Kent Downs AONB and its setting

Some developments will have a visual impact over a wide area, not just on their immediate surroundings. An Assessment is likely to be necessary for developments-

- that exceed the general height of buildings in the area (see Policy BE19)
- that affect important local views, or views of landmarks or major skyline ridges (see Policy BE20 and Appendix VII of the UDP)
- for high buildings in Bromley Town Centre
- that are located in or adjoining open land
- that affect heritage assets - Conservation Areas, Historic Parks and Gardens , Kent Downs Area of Outstanding Natural Beauty, and nearby listed buildings.

Generally an Assessment for such proposals will be required in respect of major developments, though not for all. Some Assessments can comprise photographs and photomontages to help show how the development proposed can be satisfactorily integrated into the street scene and / or the surroundings generally, but for some proposals verified computer-generated visualisations/photomontages will be necessary. In such cases, the assessment should include a computer generated zone of visual influence and the impact on local, medium and long distant views which should be done through accurate visual modelling of proposals – photomontages or three-dimensional computer models (buildings fully rendered) – from relevant assessment points defined by the Council. Proposals should be shown in daylight and night conditions and in different seasons. The Assessment should be carried out by an appropriate professional in accordance with Guidelines for Landscape and Visual Impact Assessment 2nd Edition Landscape Institute and IEMA 2002.

If the proposal affects heritage assets the Assessment should include a historical analysis of the evolution of the landscape / townscape. It may also be necessary to produce a Heritage Statement (see above).

See relevant UDP policies, and (if relevant) the Kent Downs AONB Management Plan www.kentdowns.org.uk/Management%20Plan%202004%20-%202009

Lifetime Homes and/or Wheelchair Housing Statement

Relevant policies: UDP Policy BE1 Design of New Development; London Plan Policies 3.8 Housing Choice, 7.1 Building London's Neighbourhoods and Communities and 7.2 An Inclusive Environment; the Mayor's SPG: Accessible London: Achieving an Inclusive Environment Supplementary Planning Guidance (2014), SPD: Housing (2012) and South East London Housing Partnership Wheelchair Design Guide (2012)

Application trigger: Lifetime Homes Checklist – all new residential developments. Wheelchair Housing - proposals for major residential developments which trigger a requirement of 10% wheelchair provision

Locations: Borough-wide

London Plan Policies require all new housing to be built to "Lifetime Homes" standards and 10% of new housing to be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. Bromley Council require all affordable rent wheelchair units to meet SELHP Standards. Wheelchair units of other tenures will be required to meet Wheelchair Housing Design Guide (WHDG) Stephen Thorpe and Habinteg Housing Association 2006, the main elements of which are set out in Mayoral Housing SPG 2012 Annex 2 "Best Practice Guidance for Wheelchair Accessible Housing"

Validation Guidance and Local Information Requirements for Planning Applications

Provision of new housing with these criteria in mind will allow householders to remain in their homes when their mobility is reduced, due to illness, old age or other causes, thereby providing a sustainable housing stock that is adaptable, flexible, convenient, appropriate to changing needs and enabling independent living in a cost-effective way.

Lifetime Homes

In order to demonstrate compliance with the standards floor plans at a scale of 1:50 for each unit type proposed must be submitted. The floor plans must be annotated to show compliance with the 16 lifetime homes criteria.

A statement/checklist alone is not sufficient to demonstrate compliance.

Where standards cannot be met (for example due to existing access arrangements into a building) this must be clearly set out and justified in the application.

Wheelchair Homes

In order to demonstrate compliance with the standards floor plans at a scale of 1:50 for each unit type proposed must be submitted. The floor plans must be annotated to show compliance with **full** relevant criteria which for SELHP Units will include the provision of 2 lifts for units located above the ground floor and plans to show sufficient width of communal corridors and entrances.

A statement alone is not sufficient to demonstrate compliance.

For non affordable rent properties if the first occupants are unknown, the home should be designed to be easily adaptable for future occupation by a wheelchair user i.e. the home is designed from the outset with suitable accessibility, storage capacity, refuse storage, approach space to facilities and furniture, and circulation as defined by the WHDG, that enables later minor alterations to be easily undertaken to suit individual needs. Easily adaptable should not require structural alterations (such as removing walls to enlarge rooms) to make it suitable for wheelchair users, but might require minor alterations such as installing grab rails, replacing a bath with a shower or changing the kitchen units.

Useful references: Further information is available on the Lifetime Homes website and the South East London Housing Partnership Wheelchair housing design guidelines.

<http://www.lifetimehomes.org.uk/pages/revised-design-criteria.html>

http://www.selondonhousing.org/downloads/file/43/wheelchair_homes_design_guidelines

<https://www.london.gov.uk/priorities/planning/publications/housing-supplementary-planning-guidance>

Lighting Assessment

Relevant policies: UDP Policies BE1 Design of new development and NE1, 2 and 5 Nature Conservation and Development, Protected Species

Application trigger: Floodlights and other lights that may impact on visual or residential amenity or nature conservation interests on or adjacent to an application site

Locations: Borough-wide, particularly near residential property and in / close to Green Belt / MOL; Within or adjacent to SSSI, LNR and SINC, and where protected species may be present on or adjacent to the site

All proposals that include floodlighting or involve the provision of publicly accessible developments in the vicinity of residential property, a Listed Building or a Conservation Area, or open countryside, where external lighting would be provided or made necessary by the development, should be accompanied by details of external lighting and the proposed hours when the lighting would be switched on. These details shall include a layout plan with beam orientation, a schedule of the equipment in the design, and a lighting diagram showing the intensity of illumination.

Lighting schemes should take account of –

- any possible effects on wildlife that is sensitive to lighting eg bats
- security lighting being low level / low key to avoid adverse effects on nearby properties
- lighting of public and communal areas in developments including access drives and car parking should comply with BS5489-1:2003.

Useful references: Lighting in the Countryside: Towards Good Practice (1997)

<http://archive.defra.gov.uk/environment/quality/noise/neighbour/documents/lighting-in-the-countryside-970701.pdf> is a valuable source of advice which demonstrates what can be done to lessen the effects of external lighting, including street lighting and security lighting. It is applicable in towns and cities as well as in the countryside. Conditions may be imposed on permissions that include lighting eg to control hours of use.

Marketing Evidence

(including means and period of marketing, and justification for departure from policy)

Relevant policies: UDP Chapter 10 Business & Regeneration, in particular Policies EMP3, 4 & 5, also C1 Community facilities, H12 Conversion of non-residential buildings & S4 / S5 Local and neighbourhood centres and Chapter 4 of the London Plan: London's Economy.

Application trigger: Development / reuse of business premises for non-business purposes; Loss of community facilities; Change of use of retail shops to non-retail purposes

Locations: Business Areas, other business sites; shopping centres

Applications which involve the loss of retail use, loss of commercial use, and the loss of social and community uses will need to demonstrate that harm will not be caused by weighing market and other economic information alongside environmental and social information, take full account of any longer term benefits, as well as the costs, of development, such as job creation or improved productivity including any wider benefits to national, regional or local economies, and consider whether those proposals help to meet the wider objectives of the development plan.

The evidence should set out clearly the means and period of marketing (which should not normally be less than 18 months), and the justification for any departure from planning policies.

Marketing should include use of the Councils commercial property database

http://www.bromley.gov.uk/info/200018/commercial_property/250/bromley_commercial_property_database

Useful references: See The Economic Development and Employment Land Study prepared for the Council by GVA Grimley.

http://www.bromley.gov.uk/downloads/file/714/btcaap025-bromley_economic_development_employment_land_study

Material Samples

Relevant policies: UDP Policy BE1, London Plan Design Policies 7.1, 7.4, 7.5, 7.6 and 7.7.

Application trigger: Major development proposals and other complex or sensitive proposals as advised by Planning Officers as part of the pre-application process.

Locations: Borough-wide

Good design is indivisible from good planning and the detailing of a scheme and how it is delivered is key to ensuring that a scheme is capable of being delivered as designed and is of necessary high

quality. Such details, if not considered fully as part of the early design stages, can cause difficulties at a condition stage and this detail is therefore needed up front for major or complex/sensitive proposals which will make a significant contribution towards place-making in the Borough.

Details must include:

- A full specification of all materials (including windows, doors and balconies) with at least brochure details showing the appearance of materials or ideally samples of the materials to be provided. The specification must be accompanied by a statement explaining the choice and appropriateness of materials proposed.
- A clear explanation of the longevity of the materials chosen as well as details of any measures taken to prevent adverse weathering and/or staining
- Elevations and sections at a scale of at least 1:20 showing a bay study of the buildings which shall include a window within the façade and the reveals, cills etc...
- All pipework, drainage, vents etc... must be shown

Noise and Vibration Impact Assessment

Relevant policies: UDP Policy BE1; London Plan Policy 7.15 Reducing Noise and Enhancing Soundscapes; Kent Downs AONB Management Plan Policies GNR5 & SDT 6 & 10 Geology and natural resources, and Sustainable development and travel

Application trigger: All mixed use developments and Noise-sensitive development (including residential) close to noise generating activities; Proposals that include noise generating activities & equipment / machinery

Locations: Borough-wide

Applications for developments that raise issues of disturbance by noise to the occupants of nearby existing buildings, and for developments that are considered to be noise sensitive and which are close to existing sources of noise should be supported by a noise survey and report prepared by a suitably qualified acoustician.

Surveys should be carried out in accordance with British Standard 7445-1:2003 (see www.standardsuk.com) to determine the range of ambient and background noise levels, the report should contain details of noise assessments, predictions and calculations, and give recommendations and specifications of any works necessary to control noise – such works should be detailed on the planning application drawings.

Any works necessary to control noise should be detailed on the planning application drawings. Where external noise attenuation equipment is proposed, such as acoustic enclosures or acoustic screens, the noise survey report should demonstrate the location, size and visual impact of equipment on the site/building. This is especially important with regard to historic buildings or buildings situated in conservation areas. Noise measurement surveys undertaken to establish ambient and background noise levels should be undertaken in accordance with the recommendations of BS7445. Noise surveys and reports will generally be required for developments including:

- building services and other external plant
- Other commercial proposals that include noise-generating activities and equipment / machinery
- Places of entertainment, or uses which attract large numbers of people
- Residential and other noise-sensitive developments close to busy transport routes and other noise-generating activities.

Certain of the above will also require an assessment of the impact of vibration e.g. residential development adjacent to railway tracks, proposals that include use of heavy machinery or mobile

plant.

Useful references: Advice can be sought from the Environmental Health team on 020 8313 4953.

Parking Provision for Cars and Bicycles

Relevant policies: UDP Policies T3 & T7 Parking & Cyclists, UDP Appendix II; London Plan Policies 6.9 Cycling and 6.13 Parking

Application trigger: Residential development, places of employment, education & entertainment / leisure

Locations: Borough-wide

This requires that the level of parking for certain types of development should be determined by a Transport Assessment. The Council will seek a flexible approach to on-site parking for housing schemes which considers planning applications on their individual merits in the light of the particular circumstances of the locality, to deliver parking provision that is consistent with the character of the area, so as to minimise impact on on-street parking.

A site layout showing car parking spaces (including disabled and electric vehicle spaces) and bicycle parking should be provided for all residential, commercial, retail and business developments and other uses as set out in the UDP Appendix. The layout should clearly show how space can be provided within the development for bicycle parking appropriate to the particular use (in accordance with London Plan Standards), including secure/covered facilities, and details of the proposed bicycle stands and their spacing. In residential development, cycle parking can be provided within domestic garages and garden sheds, or in purpose-built secure structures.

The car and bicycle parking should be well related to the property they are intended to serve in terms of proximity, and secure in terms of surveillance from the relevant property within the development. Layouts should also show clearly where on-site Refuse and Recycling Storage will be provided (see below). See also Transport Assessment below.

Useful references: Appendix II Parking standards of the UDP

http://www.bromley.gov.uk/info/1004/planning_policy/162/unitary_development_plan_udp gives guidance on criteria for numbers of parking spaces and acceptable layouts

Planning Obligations – Draft Heads of Terms

Relevant policies: UDP Policy IMP1 and SPD Planning obligations; London Plan Policy 8.2 Planning Obligations and 8.3 Community Infrastructure Levy; NPPF (2012); NPPG (2014)

Application trigger: Commercial and residential major proposals and residential developments comprising floorspace of more than 1000 sqm or 10+ residential dwellings. Certain Non-Major developments e.g in town centres

Locations: Borough-wide

Planning obligations (or “Section 106 agreements”) are private agreements negotiated between Local Planning Authorities and persons with an interest in land (or “developers”), and are intended to make acceptable development which would otherwise be unacceptable in planning terms.

In accordance with the Council’s adopted Supplementary Planning Document on Planning Obligations (December 2015),

http://www.bromley.gov.uk/info/856/local_development_framework/160/planning_obligations_supple

[mentary planning document](#)

In appropriate cases where S106 requirements are known, developers will be required to submit a draft “Heads of Terms” statement regarding those matters regarding which they are willing to enter into a legal agreement with the Council. Alternatively a draft legal agreement can be submitted with the application, using the template in the SPD. The matters that would be appropriate to include in a planning obligation should be identified in pre-application discussions with planning officers.

Applicants are also encouraged to prepare Unilateral Undertakings where appropriate.

For major applications, in order to facilitate the preparation of a legal agreement prior to a scheduled committee date so that decisions can be issued swiftly after a committee resolution, it will be necessary for the applicant to provide:

- Proof of the **owner’s title** (including title plan). All the owners of the site will need to enter into the agreement. If the land is registered this will be by recent office copy entries (no more than 21 days old). If it is unregistered, an epitome of title should be provided.
- **Names and addresses of any chargees, lessees, mortgages** or other holders of security on the land, as all parties with an interest in the land would need to sign the agreement.
- A written **agreement to pay the Council’s reasonable legal costs** in connection with the negotiation, preparation and monitoring of the legal agreement. In the event that the application is refused (contrary to Officers recommendation) it will still be necessary for the applicant to pay any legal fees associated with the draft of the s106.
- Contact details if there is a solicitor acting on behalf of the applicant

Useful references: Further information on planning obligations is available in the Planning Practice Guidance 2014
See also Financial Viability Assessment above.

Planning Statement

Relevant policies: Wide range of UDP Policies including G1, G2, G8 Green Belt, MOL & Urban Open Space, those in Chapter 10 Business & Regeneration, and C1 Community Facilities; BTC AAP

Application trigger: Major developments which raise a wide range of planning issues, including justification of “very special circumstances” regarding Green Belt / MOL

Locations: Borough-wide including applications in Green Belt / MOL / Urban Open Space and Town Centres

A planning statement identifies the context and need for a proposed development and includes an assessment of how the proposed development accords with relevant national, regional and local planning policies.

A Planning Statement will be required for certain “major” developments, developments not in accordance with the Unitary Development Plan / Local Development Framework (LDF), and other developments if specified in pre-application advice. One example is the need to submit a statement regarding any “very special circumstances” regarding “inappropriate” development in the Green Belt or on Metropolitan Open Land.

Another circumstance where a Planning Statement is likely to be required is when a proposal would lead to a loss of community facilities - if it can be demonstrated that there is no longer a need for the

facilities or alternative provision can be made in an equally accessible location, this should be explained in the Statement.

The statement will explain how the proposal relates in policy terms to national and regional planning guidance, the development plan and adopted Supplementary Planning Guidance; and as they emerge, the LDF and Supplementary Planning Documents. It should also include details of consultations with the Local Planning Authority and statutory consultees undertaken prior to submission. Pre-application consultation with the local community should be set out in the Statement of Community Involvement.

Refuse and Recycling Storage

Relevant policies: UDP Policy BE1 Design of New Development

Application trigger: Residential development, places of employment, education & entertainment / leisure

Locations: Borough-wide

The layout for developments should show where storage can be provided for refuse and recycling before it is collected. The location shown should be convenient for collection from an adopted highway in terms of distance, route and gradient, and comprise an adequate area for storage in relation to the proposal. Layouts should also show clearly where on-site Parking Provision for Cars and Bicycles will be provided (see above).

Useful references: Guidance is given in Notes for Developers and Architects (December 2009) The Storage and Collection of Refuse from Residential and Commercial Buildings, which is available on the Council's website.

Statement of Community Involvement (SCI)

Relevant policies: LDF Statement of Community Involvement

Application trigger: Major developments sites

Locations: Borough-wide

An SCI will normally only be required for major developments. It will explain how the applicant has complied with the requirements for pre-application consultation set out in Section 4 of the Local Development Framework Statement of Community Involvement http://www.bromley.gov.uk/info/856/local_development_framework/154/statement_of_community_involvement and demonstrate that the views of the local community have been sought and taken into account in the formulation of development proposals.

Structural Survey and Rebuilding Method Statement

Relevant policies: UDP Policies BE8, 9, 10 and 12 G1 & G2 Listed Buildings / Conservation Areas, Green Belt & MOL; NPPF 2012

Application trigger: Listed Building Consent; Demolition of Statutory & Locally Listed Buildings; Conversion / reuse of buildings in Green Belt /MOL

Locations: Borough-wide

Proposals for the conversion / reuse of an existing building in the Green Belt and Metropolitan Open Land are "appropriate" development providing certain criteria are met, including that the building is of permanent and substantial construction. A Structural Survey / Rebuilding Method Statement should be submitted with such proposals and include a survey of the structure and building fabric and a method statement setting out what existing fabric can be retained and what will be replaced, and the construction work and new materials necessary to bring the building up to modern standards to

comply with the Building Regulations.

A Statement may need to be submitted with an application for Listed Building Consent, though this material could form part of a Heritage Statement (see above). A Statement should be submitted with a planning application that involves the substantial alteration or demolition of a statutory or locally listed building, and for Conservation Area Consent applications to demolish – in the case of the latter, if the building concerned has a negative impact on the character and appearance of the area, a Statement will not be required. Pre-application advice can be given by the Council's conservation officer. The Statement could form part of a Heritage Statement (see above).

Sustainability Statement

Relevant policies: London Plan Climate Change Policies 5.1 and 5.3; NPPF (2012) and NPG (2014)

Application trigger: Non majors (i.e 1-10 dwellings which do not generate the need for a full energy assessment)

Locations: Borough-wide

The purpose of a Sustainability Statement is to demonstrate how a development has been designed to improve the environmental performance and efficiency of a building, at the construction and operational phase. The need for this type of assessment is outlined in London Plan Policies.

The statement must demonstrate energy efficiency and water saving measures and details of how these will be delivered as far as practically possible within the scale of the development proposed.

Further advice can be found in the GLA's supplementary planning guidance on Sustainable Design and Construction http://www.london.gov.uk/thelondonplan/guides/spg/spg_04.jsp

Telecommunication Development Information

Relevant policies: BE22 Telecommunications Apparatus

Application trigger: Telecommunications masts, base stations & related apparatus

Locations: Borough-wide

Planning applications for mast and antenna development by mobile phone network operators in England should be accompanied by a range of supplementary information including the area of search, details of any consultation undertaken, details of the proposed structure, and technical justification and information about the proposed development.

Planning applications should also be accompanied by a signed declaration that the equipment and installation has been designed to be in full compliance with the requirements of the radio frequency (RF) public exposure guidelines of the International Commission on Non-Ionizing Radiation Protection (ICNIRP).

Useful references: Further guidance on the information that may be required is set out in the Code of Practice on Mobile Network Development

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/11486/codemobilenet_work.pdf

Town Centre Uses and Retail Impact Assessment

Relevant policies: Policies in UDP Chapter 11 "Town Centres & Shopping"; London Plan Retail Policies 4.7 – 4.9; NPPF 2012

Application trigger: Major developments; Non-Major developments including changes of use of

retail premises

Locations: Commercial floorspace within and outside retail centres

Town Centre uses include retail, leisure / entertainment, sport / recreation, office and hotel developments. Dependent on their floor space and location (which type of Centre, or other location), evidence may need to be submitted providing-

- a needs assessment, including quantitative and qualitative need, justifying the development
- details of the sequential approach undertaken that have led to the proposed site being selected (excluding extensions to existing developments if they are less than 200 sq. m)
- an assessment of the proposed development's impact on the vitality and viability of existing centres
- an assessment of how the chosen location is accessible.

Applications for changes of use of ground floor premises in shopping centres from retail to other uses should be accompanied by a mapped survey of the uses of nearby premises and a statement to address issues in the relevant policy in Chapter 11 of the Unitary Development Plan

http://www.bromley.gov.uk/info/1004/planning_policy/162/unitary_development_plan_udp

See also Marketing Evidence above.

Useful references: Planning for Town Centres

<http://www.planningportal.gov.uk/planning/planningpolicyandlegislation/currentenglishpolicy/goodpracticeguides/towncentres>

Transport Assessment

Relevant policies: UDP Policies T1, T2, T3 & T18 Transport demands, Transport effects, Parking & Road safety; London Plan Policy 6.3 Assessing Effects of Development on Transport Capacity, Policy 6.9 Cycling, 6.10 Walking, 6.11 Smoothing Traffic Flow and Tackling Congestion, 6.12 Road Network Capacity and 6.13 Parking; NPPF 2012

Application trigger: Major developments and other developments which would have an impact on the highway

Locations: Borough-wide

A Transport Assessment (TA) should be submitted as part of any planning application where the proposed development has significant transport implications. The coverage and detail of the TA should reflect the scale of the development and the extent of the transport implications of the proposal. For smaller schemes the TA should simply outline the transport aspects of the application, while for major proposals, the TA should illustrate accessibility to the site by all modes of transport, and the likely modal split of journeys to and from site.

It should also give details of proposed measures to improve access by public transport, walking and cycling, to reduce the need for parking associated with the proposal, and to mitigate transport impacts. It may be necessary for the TA to determine the car parking requirement for the development.

Useful references: Further guidance can be found in the Department of Transport's Guidance on Transport Assessment (March 2007)

<https://www.gov.uk/government/publications/guidance-on-transport-assessment> and Transport for London's Transport Assessment Best Practice Guidance Document

<http://www.tfl.gov.uk/assets/downloads/businessandpartners/transport-assessment-best-practice-guidance.pdf> . See also Policies T1 and T2 and Appendix II.16 of the Unitary Development Plan.

http://www.bromley.gov.uk/info/1004/planning_policy/162/unitary_development_plan_udp

See Parking Provision for Cars and Bicycles above.

Travel Plan

Relevant policies: UDP Policy T2 Transport effects; London Plan Policy 6.3 Assessing Effects of Development on Transport Capacity, Policy 6.9 Cycling, 6.10 Walking, 6.11 Smoothing Traffic Flow and Tackling Congestion, 6.12 Road Network Capacity and 6.13 Parking; NPPF 2012

Application trigger: Major developments

Locations: Borough-wide

A Travel Plan is a general term for a package of measures tailored to meet the transport needs of individual developments and aimed at promoting environmentally sustainable travel choices for residents, staff, visitors and customers, including reductions in car use, particularly single occupancy car journeys. They are just as important as other transport infrastructure and mitigation measures addressed in a Transport Assessment and can be used to identify measures that would reduce the level of potential traffic impact of development proposals. These can include car sharing, encouraging cycling, providing information about public transport and promoting flexible working. Travel Plans can address commuter journeys, business travel undertaken during the working day, visitors and deliveries.

They should be submitted with applications for major developments that are likely to have significant transport implications. The Travel Plan should be worked up in consultation with the Council and local transport providers. In the case of speculative development it may be difficult to fully detail all aspects of a Travel Plan in the absence of a known occupier. The implementation of a Travel Plan is normally secured by a planning condition which will require that the Plan is regularly reviewed, and this can include updating once the development is occupied.

Useful references: Further information can be found in the Department for Transport's "Delivering Travel Plans Through the Planning System",

<http://www.planningportal.gov.uk/planning/planningpolicyandlegislation/currentenglishpolicy/goodpracticeguides/deveringtravelplans> and Transport for London's Guidance for residential travel planning in London

www.tfl.gov.uk/microsites/interchange/documents/guidance-residential-travel-planning-2008.pdf and Guidance for workplace travel planning in London

www.tfl.gov.uk/microsites/interchange/documents/guidance-workplace-travel-planning-2008.pdf .

Transport for London also have a travel plan tool ATTrBuTe for drawing up and evaluating Travel Plans www.attrbute.org.uk

Tree Survey and Arboricultural Implications Report

Relevant policies: UDP Policy NE7 Development & trees

Application trigger: Development on sites where there are existing trees

Locations: Borough-wide

Where there are trees within the application site, or on land adjacent to it that could influence or be affected by the development (including street trees), information will be required on which trees are to be retained and on the means of protecting these trees during construction works. This information should be prepared by a qualified arboriculturist.

Full guidance on the survey information, protection plan and method statement that should be provided with an application is set out in the current British Standard 5837:2005 'Trees in relation to construction – Recommendations', see www.standardsuk.com. Using the methodology set out in the BS should help to ensure that development is suitably integrated with trees and that potential conflicts are avoided.

Seeking pre-application advice from the Planning Divisions' Tree Officer is recommended to establish what level of information is required. The following information should normally be

submitted-

- Land Survey – this should be precise and show all relevant site features, including accurate location and identification of all trees, hedgerows and shrubs over 2 metres in height and/or with a stem diameter of 7.5cm measured at 1.5 metres above ground level. It should be made available at pre-application stage as scale drawings (1:100 or 1:200) and in a commonly agreed digital format, if available. The survey should also include spot heights of ground level throughout the site and location of trees on adjoining land less than half a tree height from the site boundary.
- Tree Survey – All trees should be numbered on the land survey plan. Where appropriate, due to dense tree cover, tags with a corresponding number should be attached to all trees. A tree survey should only be undertaken by a suitably qualified arboriculturist with experience of trees on development sites and will be expected to meet the requirements of sections 4.2 to 4.4 of BS5837 (or the current revision of this document). It should assess all existing trees, including those on neighbouring land that may be affected by the development, and should include at least the following information; Species of tree, height (in metres), diameter of the trunk (measured at 1.5m above ground level on single stem trees and immediately above the root flare on multi-stemmed trees), canopy spread in metres in relation to all four compass points (to be recorded on tree survey plan), height of crown base (i.e. clearance above ground of lowest branches; in metres), age class (young, middle age, mature, over mature, veteran), assessment of condition (physiological and structural), tree management recommendations (e.g. Remove deadwood, crown lift etc), desirability for retention in accordance with Table 1 of BS5837. The category of each tree should be clearly differentiated on the survey schedule and plan i.e. A, B, C and R (good, medium and low quality and value, or removal for reasons of sound arboricultural management respectively).

Unless otherwise agreed with the planning tree officers, the Tree Survey and Arboricultural Implications Report should be prepared in at least draft form prior to pre-application discussions regarding the proposed development, to establish which trees are desirable to retain. Where appropriate, the Council will impose conditions on planning permissions to protect trees on development sites during the construction period.

Useful references: Other sources of information are Arboricultural Practice Note 12 (APN 12) Through the Trees to Development www.treesource.co.uk and NJUG10 Guidelines for the Planning, Installation and Maintenance of Utility Services in Proximity to Trees <http://www.njug.org.uk/category/3/pageid/5/>

Ventilation/Extraction Details and Specification

Relevant policies: UDP Policies ER9 & S9 Ventilation & Food & drink premises; 7.14 Improving Air Quality; NPPF (2012); NPG (2014)

Application trigger: Restaurants, cafes & hot food takeaways (Classes A3, A4 & A5) and other commercial extraction flues

Locations: Borough-wide

Details of the position and design of ventilation and extraction equipment, including odour abatement techniques and acoustic noise characteristics, will be required to accompany all applications for the use of premises for purposes within Use Classes A3 (Restaurants and cafes – use for the sale of food and drink for consumption on the premises), A4 (drinking establishments – use as a public house, wine-bar or other drinking establishment), A5 (Hot food takeaways – use for the sale of hot food for consumption off the premises), B1 (general business) and B2 (general industrial).

This information (excluding odour abatement techniques unless specifically required) will also be



Validation Guidance and Local Information Requirements for Planning Applications

required for significant retail, business, industrial or leisure or other similar developments where substantial ventilation or extraction equipment is proposed to be installed. Please contact us for information about ventilation and ductwork systems for food and drink premises.

Even when a future occupier is not known, applicants are likely to be required to demonstrate that any necessary equipment and ducting can be provided without any harmful visual or amenity impact.

Contact Information

Planning – planning@bromley.gov.uk 020 8313 4956

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Report No.
CSD15091

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: Development Control Committee
Executive

Date: 13th July 2015
15th July 2015

Decision Type: Non-Urgent Executive Non-Key

Title: PETITION – BULL LANE ALLOTMENTS

Contact Officer: Graham Walton, Democratic Services Manager
Tel. 020 8461 7743 E-mail: graham.walton@bromley.gov.uk

Chief Officer: Mark Bowen, Director of Corporate Services

Ward: Chislehurst

1. Reason for report

At the full Council meeting on 29th June 2015 Members received a petition from the Bull Lane Action Group with 801 validated signatures calling on the Council to designate the Bull Lane Allotments in Chislehurst as Local Green Space. The Petition was referred to Development Control Committee and the Executive to consider.

2. **RECOMMENDATION(S)**

That Development Control Committee recommends to the Executive that the merits of designating the Bull Lane Allotments as Local Green Space be formally considered through the Local Plan process, and the Petition be included as a submission seeking this change.

Corporate Policy

1. Policy Status: Existing Policy:
 2. BBB Priority: Quality Environment Vibrant, Thriving Town Centres:
-

Financial

1. Cost of proposal: No Cost:
 2. Ongoing costs: Not Applicable:
 3. Budget head/performance centre: Not Applicable
 4. Total current budget for this head: £ Not Applicable
 5. Source of funding: Not Applicable
-

Staff

1. Number of staff (current and additional): Not Applicable
 2. If from existing staff resources, number of staff hours: Not Applicable
-

Legal

1. Legal Requirement: None:
 2. Call-in: Applicable:
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): The petition has been signed by 801 people who live or work in the borough.
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? Yes
2. Summary of Ward Councillors comments: Ward Councillors supported the aims of the petitioners at full Council on 29th June 2015.

3. COMMENTARY

- 3.1 The Council has received a petition with 801 validated signatures (with more signatures received since validation) from the Bull Lane Action Group. The petition stated –

“LOCAL GREEN SPACE” is the most protective of planning designations in recent legislation and will provide the best possible safeguards for the allotment, the surrounding area and the wider local environment in the long term. This measure has the advantage of linking the best interests of residents with those of the allotment tenants. All Bromley voters and those working or studying in the Borough can sign. If this petition is large enough we intend to request that the following motion be put before the full Council:

We, the undersigned, request that Bromley Borough Council designate the site of Bull Lane Allotments as Local Green Space

- 3.2 The Council’s formal response to the petition, from the Portfolio Holder for Renewal and Recreation, was as follows -

“Thank you for your petition with over 800 valid signatures requesting that the Council designates the site of the Bull Lane Allotments as Local Green Space.

The Bull Lane Allotments are at present subject to the Town Planning designation ‘Urban Open Space’.

The petition seeks designations as ‘Local Green Space’ which is another Town Planning designation. In general, this is a more exacting designation than Urban Open Space.

The designation is established via the Local Plan, which is at present in preparation.

It is therefore proposed to respond to the petition by assessing its merits through the Local Plan process and including the petition as a submission seeking the change of designation to ‘Local Green Space’.

If you are not satisfied with this response then, as you have more than 500 signatures on your petition, you can request to address the next meeting of the full Council for five minutes in support of your case. If you wish to do this please contact Graham Walton, Democratic Services Manager on 020 8461 7743 or graham.walton@bromley.gov.uk .”

- 3.3 The lead petitioners exercised their right to speak at a full Council meeting, and Mr Ben Lyon addressed the Council at the meeting on 29th June in support of the petition. He stated that local residents, allotment holders and other supporters objected to the possibility of the Diocese of Rochester, who owned the land, building a school on the site, which was designated as Urban Open Space and in a conservation area, but which needed and deserved the increased protection of being designated as Local Green Space. He declared that the special attributes of the land could be demonstrated in terms of its recreational value, historical significance and beauty and tranquillity.
- 3.4 The Council decided to refer the issue to Development Control Committee and then to the Executive for consideration.

Non-Applicable Sections:	Policy/Finance/Legal/Personnel
Background Documents: (Access via Contact Officer)	Petition submitted June 2015 from the Bull Lane Action Group

Report No.
DRR15/070

London Borough of Bromley

PART ONE – PUBLIC

Decision Maker: DEVELOPMENT CONTROL COMMITTEE
EXECUTIVE

Date: 13th July 2015
15th July 2015

Decision Type: Non-Urgent Non-Executive Non-Key

Title: BROMLEY'S LOCAL PLAN - 'POTENTIAL SITE ALLOCATIONS
DRAFT POLICY AND DESIGNATIONS ALTERATIONS' FOR
CONSULTATION

Contact Officer: Mary Manuel, Head of Planning Strategy and Projects
Tel: 020 8313 4303 E-mail: mary.manuel@bromley.gov.uk

Chief Officer: Chief Planner

Ward: (All Wards);

1. Reason for report

- 1.1 This report seeks Development Control Committee's (DCC) endorsement of Appendix 1 as the consultative 'Local Plan – Potential Sites, Draft Policy and Designation Alterations' stage in the preparation of Bromley's Local Plan. DCC is asked to consider the report and refer it to the Executive for approval for the purpose of consultation with residents, partner organisations, and the wider community.
- 1.2 The consultation is made under regulation 18 of the Town and Country Planning Regulations 2012. Early in 2014 the Council consulted on its Draft Policies and Designations, also under regulation 18. The planned consultation focuses on potential draft site allocations, in line with the vision and objectives in the earlier local plan documents. It also includes a limited number of new and revised policies and designations reflecting the requirement for the Local Plan to be in conformity with the London Plan (March 2015), and the updated evidence base. The report also sets out the proposed consultation in line with the Council's Statement of Community Involvement.
- 1.3 The report highlights the potential draft site allocations, policies and designations to be set out in the consultative document. Appendix 1 sets out the substantive content of the consultation document for approval.
-

2. RECOMMENDATION(S)

That Development Control Committee:

- 2.1 Endorse Appendix 1 as the 'Local Plan – Potential Sites, Draft Policy and Designation Alterations' document for the Executive to agree for public consultation.**

That the Executive:

- 2.2 Consider the comments from Development Control Committee with regard to the Local Plan – Potential Sites, Draft Policy and Designation Alterations, and**
- 2.3 Agree Appendix 1 as the Local Plan – Potential Sites, Draft Policy and Designation Alterations document for consultation, subject to the Director of Regeneration and Transformation, in consultation with the Chairman, being authorised to make any minor alterations to the document as required prior to publication.**

Corporate Policy

1. Policy Status: New Policy:
 2. BBB Priority: Children and Young People Excellent Council Quality Environment Safer Bromley Supporting Independence Vibrant, Thriving Town Centres
-

Financial

1. Cost of proposal: Estimated cost for the current consultation £3k
 2. Ongoing costs: Non-Recurring Cost
 3. Budget head/performance centre: Planning and Renewal
 4. Total current budget for this head: £2.2m
 5. Source of funding: Existing controllable revenue budget 2015/16
-

Staff

1. Number of staff (current and additional): 65ftes
 2. If from existing staff resources, number of staff hours:
-

Legal

1. Legal Requirement: Statutory Requirement
 2. Call-in: Not Applicable:
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): Borough-wide
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? Ward Councillors have been invited to participate in earlier stages of the plan preparation, and will be consulted as part of the wider consultation process.
2. Summary of Ward Councillors comments: Ward Councillors comments have been taken into account in the preparation of this stage of the Local Plan.

3. COMMENTARY

- 3.1 The Local Development Scheme (LDS) agreed in May 2015 by the Executive sets an ambitious programme for the Local Plan in recognition of the importance of the Borough having an 'up to date plan' as required by Government guidance.
- 3.2 Consultation on the 'Draft Policies and Designations' document was undertaken in early 2014 which followed the 'Options and Preferred Strategy' consultation in Spring 2013. DCC considered the response to the 'Options and Preferred Strategy' document consultation undertaken in Spring 2013 at its June 2013 meeting and agreed that the Preferred Options be progressed to draft policies and site allocations, with key issues and areas of potential non-conformity with the London Plan brought back to the Local Development Framework Advisory Panel (LDFAP) and Development Control Committee (DCC) for further discussion.
- 3.3 In 2014 the Council undertook consultation on its Draft Policies and Designations Document (DP&D) which also included a 'Call for Sites' inviting the submission of sites for assessment as potential draft site allocations in the Local Plan. Comments and sites continued to be received during 2014. During this time the Mayor consulted on his Further Alterations to the London Plan, to which the Council made representations. Following an Examination in Public, and an Inspector's report, in March 2015 the revised London Plan was published.
- 3.4 As planned this consultation focuses on the identification of Draft Site Allocations, however, it also includes a limited number of revised and new draft policies which are considered important alongside the proposed draft allocations to reflect the requirement for the Local Plan to be in general conformity with the amended London Plan (March 2015) and updated evidence base. The proposed consultation is an 'informal' stage under regulation 18. It plays an important role in ensuring the early and ongoing engagement of the community and partners in the plan making process as required by Government. It provides a timely opportunity for residents, statutory and other partners to respond to, and comment on the draft allocations and ensure that the Draft Local Plan when finalised is a robust and 'sound' plan that also meets regulatory requirements.
- 3.5 The intention is for responses to consultation to be reported to DCC and the Executive alongside the earlier consultation responses to enable consideration to inform the preparation of the Draft Local Plan and the formal consultation under Regulation 19 of the Town and Country Planning Regulations.
- 3.6 The Planning Strategy Team lead the Local Plan preparation, working with officers across the Council and partner organisations, producing further evidence where necessary and developing the plan in line with the 'Vision and Objectives' and the Council's priorities.
- 3.7 Appendix 1 comprises the draft consultative 'Potential Site Allocations, Further Draft Policy and Designations, a key stage in the development of Bromley's Local Plan.
- 3.8 Development Control Committee is asked to consider and comment on Appendix 1 in advance of the Executive being asked to endorse the document for consultation. Comments from the DCC meeting will be reported to the Executive.
- 3.9 The Local Plan sets out the vision and objectives, and the policies against which planning applications will be determined (together with the London Plan) and the priorities against which the plan will be monitored and reviewed. The Local Plan is the spatial expression of Bromley 2020 as the Borough's Community Strategy and extends the vision to 2031.
- 3.10 Bromley's Local Plan, together with the London Plan, when adopted, will form the Development Plan for the Borough. The Local Plan has to be in general conformity with the London Plan (March 2015) and with the National Planning Policy Framework published in March 2012.

3.11 The preparation of the Local Plan has to meet the requirements of planning legislation and regulations, including the Duty to Co-operate introduced in the 2011 Localism Act, (amending the 2004 Planning and Compulsory Purchase Act). Planning legislation and regulations set out procedures to be followed in the preparation of development plans and for the plan to be 'legal and sound'. The Duty to Co-operate places a legal duty on the Council to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation relating to strategic cross boundary matters. This has been met to date through meetings and dialogue with individual boroughs and partners and sub-regional officer groups and is ongoing. The London Plan is also relevant in the context of Greater London.

3.12 National Context

The National Planning Policy Framework 2012 sets out the four 'Tests of Soundness' against which Bromley's Local Plan will be assessed by the Planning Inspectorate when examined. To demonstrate that the plan is 'sound' the Council the Plan will be:-

- Positively prepared –based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

The Government published the national planning policy guidance in March 2014, The relevant guidance to the plan making process has been followed

3.13 London Plan 2015

The Local Plan is required to be in 'general conformity with the London Plan. The formal amendments to the London Plan (March 2015) contain several key changes impacting on the preparation of the Local Plan. These include:

- Revised minimum housing figure of 641 homes per annum for the Borough, in the context of 423,887 per annum across London, and an identified need of 49,000 homes over a ten year period.
- Recognition of the need for flexibility for more generous parking standards in parts of Outer London where public transport is very poor.
- Bromley Town Centre designated as an Opportunity Area.
- Crystal Palace identified as a potential Strategic Outer London Development centre.
- Lower level classification of the guidelines for office development in Bromley Town Centre, and removal of office classification for Orpington Town Centre.
- Revised employment forecasts and wording requiring greater flexibility with regard to vacant commercial floorspace in particular, retail and office floorspace.

3.14 Consultation

It is proposed that the consultation on the 'Draft Allocations' follows the format used for the previous stages of the Local Plan preparation as outlined below. This consultation forms an informal stage of consultation in the Local Plan preparation, but a very important one. It will comply with the Council's adopted Statement of Community Involvement (2006).

Evidence of the consultation and engagement undertaken during the plan-making process will be required to demonstrate the Local Plan has followed the prescribed process, as set out in planning legislation and regulations, and the NPPF. This will be a matter for the Inspector at the Examination into the 'soundness' of the Local Plan.

The proposed consultation, as previously will be web based to minimise the costs to the Council and facilitate the analysis of responses. However, to maximise the awareness of the opportunity to respond it will include:

- Emails/ letters to around 1500 contacts on the planning database advising of the consultation details. This includes statutory consultees, adjoining boroughs and other partner agencies, residents associations and individuals, businesses and developers who have registered their interest in being consulted.
- A dedicated webpage and link from the Council's home page.
- Press releases and articles in the local papers and community newsletters.
- Poster and flyers placed in Council offices (including the Civic Centre, Mottingham and Cotmandene Outreach Centres and libraries).
- Article and link to the webpage in Community Links Bromley e-bulletin to over 500 voluntary and community organisations.
- Article and link to the webpage in the Council's business bulletin sent to over 2500 businesses.
- A display promoting the consultation within the Civic Centre
- Inclusion in 'Update' circulated to all residents associations.

In addition copies of the consultation document will be made available for inspection at the Civic Centre, Mottingham and Cotmandene Outreach Centres and Bromley Community Links.

Format of the Consultation Document

4.1 The **Introduction and Strategic Context** explain the purpose of the document and set the scene in relation to the scale and nature of the Borough. The Vision, Objectives, and Spatial Strategy forming the basis for the last consultation will be included to provide the context for the Potential Site Allocations, policies and further designations.

4.2 The **Spatial Strategy** is then set out, as in the Draft Policies and Designations document, highlighting:

- Bromley Town Centre – a focus for sustainable growth for retail, office, homes, and leisure and cultural activities
- Cray Business Corridor - the main industrial and business area within the borough, providing accommodation for a full range of businesses, and improving the offer for modern business
- Biggin Hill SOLDC a cluster of businesses focused on aviation and high tech related industries
- Protecting and enhancing the quality and character of all Bromley's Places
- Protecting and enhancing the Borough's varied open spaces and natural environment
- Improvement of Renewal Areas

- Maintaining and enhancing the network of town centres, local centres and neighbourhood parades.

Planning Strategy

- 4.3 The planning strategy is outlined followed by draft allocations, policies and designations set out under the thematic chapters, where appropriate, used in previous consultations for ease of reference.. The relevant chapters comprise: ***Living in Bromley, Supporting Communities, Getting Around, Valued Environments*** and ***Working in Bromley***.

Draft Revised and New Policies

- 4.4 The consultation document only includes draft revised and new policies where they directly relate to the revisions to the London Plan 2015 to ensure the emerging Local Plan is in conformity , or to new and revised designations. The policies are set out below, however, the consultation document includes supporting text, and the broader context and links to the associated documents and evidence.

Living In Bromley

Revised Draft Policy - Housing Supply

The Council will make provision for **a minimum of 641** additional homes per annum over the fifteen year Plan period which will be facilitated by:

- i. The development of Proposal Sites;
- ii. Town centre renewal involving the provision of housing;
- iii. The development of housing within Renewal Areas where appropriate;
- iv. The development or redevelopment of windfall sites;
- v. The conversion of suitable properties;
- vi. Mixed use developments including housing in suitable locations;
- vii. The provision of suitable non-self-contained units;
- viii. Vacant properties being brought back into use;
- ix. Resisting the loss of existing housing except where accommodation is unsuitable and incapable of being adapted for continued residential use or where the proposal meets an identified need for community facilities.

Getting Around

Revised Draft Policy - Parking

i. The Council will normally require off-street parking spaces to be provided in new residential development at the following minimum levels:

4 or more bedrooms	2 spaces
3 bedrooms	1.5 spaces
1-2 bedrooms	1 space

Except in the three 'parking zones' identified on Maps a, b, c where

The Council will normally require off-street parking spaces to be provided in new residential development at the following minimum levels:

4 or more bedrooms 1.5 spaces

3 bedrooms 1 space

1-2 bedrooms 0.7 space

ii. The accessibility, type, mix and use of any new development along with availability and opportunity for public transport will be considered when determining appropriate levels of residential vehicle parking.

iii. Parking for all other types of development is to be provided at levels set out in London Plan (LP) Table 6.2

iv. In addition to the above, developments must:

- provide designated blue badge parking as per LP Table 6.2.
- meet minimum cycle parking standards as per LP Table 6.3
- ensure 1 in 5 spaces have provision (both active and passive) for electric vehicle charge points.
- make provision for a car club, if above the minimum Transport for London (TfL) threshold.

v. Where parking pressures are identified at and around key public transport interchanges, new parking proposals will be supported on the basis that they do not undermine policies to encourage walking, cycling and public transport use.

vi. For development where servicing problems may arise, the Council will normally require off-street/rear servicing facilities.

Revised Draft Policy - Safeguarding land for transport investment

The Council will continue to safeguard land for the following transport investment schemes:

- A21 Masons Hill, between Kentish Way and the B265 intersection Hayes Lane and Homesdale Road

The Council will **continue** safeguards currently in force relating to land at:

- A233 Leaves Green Road/Downe Road to Blackness Lane, Keston
- A208 Mottingham Road/ Whitehorse Hill/ William Barefoot Drive/ Elmstead Lane
- B251 Hayes Lane/ Shortlands Road/ Scotts Lane

The Council proposes to explore with TfL the potential for improvements at the junction of the A232 Croydon Road and the A233 Westerham Road and Oakley Road.

The Council proposes the safeguarding of land and route alignment for the following public transport investment (including land for construction and operation):

- Docklands Light Railway from Catford to Bromley South via Bromley North
- Tramlink from Beckenham Junction to Crystal Palace

Valued Environments

Revised Draft Policy - Areas of Special Residential Character

Development proposed within Areas designated as Areas of Special Residential Character on the proposals maps will be required to respect, **enhance and strengthen their special and distinctive qualities.**

Working in Bromley

New Draft Policy - Crystal Palace Strategic Outer London Development Centre

The Council will expect any proposals for the Crystal Palace Strategic Outer London Development Centre (SOLDC) as defined on the policies map to maintain enhance and support the unique existing strategic cultural, sports, tourism and leisure functions of the Crystal Palace Park, and particularly the sub-regional importance of the National Sports Centre.

Any development proposals will be subject to other policies within the Local Plan, notably Metropolitan Open Land policies and guidance related to the Crystal Palace Park Conservation Area and will be required to be in accordance with the objectives identified as part of the approved masterplan for the park. They will be expected to contribute to and/or strengthen as appropriate the sub-regional importance of the SOLD having regards to its specialist identified strengths whilst maintaining and improving the park's open setting and the visual and landscaping amenities which inform its character and that of the key heritage assets within its boundaries.

The Council will work with the Mayor, the community and other stakeholders to ensure that development proposals and other initiatives within the SOLD contribute to the long term planning and regeneration strategies for the park and support where appropriate the wider Crystal Palace, Penge and Anerley renewal area objectives.

Proposed SOLDC Boundary



New Draft Policy - Key office Clusters (KOCs)

The council seeks to retain an adequate stock of good quality office floorspace to meet the forecast employment growth for the Borough.

The offices and sites in the following locations, defined as Key Office Clusters (KOCs) on the policies map, will be safeguarded for office use:

- i Beckenham High Street , Beckenham Town Centre
- ii Crayfield Business Park, The Crays
- iii Knoll Rise, Orpington Town Centre
- iv. Masons Hill, Bromley Town Centre

New Draft Policy - East of South Camp

Development proposals for the area east of South Camp will be restricted to airport and aviation related development. This location is not considered appropriate for non-airport related development but could be used for replacement or relocated flying club buildings, aircraft parking and maintenance and similar aviation facilities.

New Draft Policy - Terminal Area

Development proposals for the Terminal Areas will be restricted to airport and aviation related development. This location is not considered appropriate for non-airport related development.

Potential Draft Site Allocations and Designations

- 4.5 Table 1 summarises recommended draft site allocations and designations for inclusion in the consultation document. The local plan identifies, designates and safeguards land for a particular use (such as housing, employment, education and open space) to ensure sufficient land is available to implement the Local Plan vision and objectives.

Table 1

Ward	Site	Recommended Draft Designation/Allocation
Bickley	Vacant Gasholder Station, Homesdale Road / Liddon Rd,	Mixed Use Retail and Residential
Bickley	St Hugh's Playing Field, Chislehurst Road	Education Use
Bickley	Land Adjacent to Bickley Station	Residential
Bickley	Scotts Park Primary School	Safeguarded as Education Land - remove from Metropolitan Open Land and designate as Urban Open Space,
Biggin Hill	Strategic Outer London Development Centre (SOLDC), Biggin Hill (BH)	For employment development (aviation related) West Camp – remove from Green Belt for aviation related use airside and business/enterprise use as part of the SOLDC Terminal Area – remove from Green Belt for airport and aviation related uses as part of the SOLDC East Camp – retained in Green Belt for aviation and airport related uses as part of the SOLDC Land East of South Camp – remove from Green Belt for aviation and airport related use as part of the SOLDC South Camp - aviation and airport use airside and business/enterprise on remainder of land as part of SOLDC Biggin Hill Locally Significant Industrial Site for business use and part of the SOLDC
Biggin Hill	Oaklands Primary School	Safeguarded as Education Land - remove from Green Belt and designate as Urban Open Space,
Biggin Hill	Saltbox Hill	Traveller Site
Bromley Common & Keston	148 Croydon Road	Traveller Site
Bromley Common & Keston	The Beechwood Centre, Lower Gravel Road	Locally Significant Industrial Site
Bromley Common & Keston	Bencewell Business Park, Oakley Road	Locally Significant Industrial Site
Bromley Common & Keston	Bromley Education Trust (BET) Hayes Lane	Education Use, removal from Green Belt and designation as Urban open Space
Bromley Common & Keston	Enterprise House, Hastings Road	Locally Significant Industrial Site
Bromley Common & Keston	Land at Turpington Lane	Education Use, removal from Green Belt and re-designation as Urban Open Space

Ward	Site	Recommended Draft Designation/Allocation
Bromley Town	Bromley Industrial Centre + others, Waldo Road	Locally Significant Industrial Site
Bromley Town	1 Westmoreland Rd	Education Use
Bromley Town	Bromley Civic Centre	Mixed use with potential education use, housing , civic centre uses and other town centre uses.
Bromley Town	Bromley North Station	Mixed use including residential
Bromley Town	Masons Hill	Key Office Cluster
Chelsfield and Pratts Bottom	Chelsfield Park proposed ASRC	Area of Special Residential Character
Chislehurst	Edgebury Primary	Safeguarded as Education Land - remove from Green Belt and designate as Urban Open Space,
Chislehurst	Land adjacent Edgebury Primary	Safeguard for Education Use - remove from Green Belt and designate as Urban Open Space,
Chislehurst	Mead Road Infants School	Safeguarded as Education Land - remove from Metropolitan Open Land and designate as Urban Open Space,
Chislehurst	Marlings Park Estate proposed ASRC	Area of Special Residential Character
Chislehurst and Mottingham & Chislehurst North	Land at Bushell Way	Education Use
Copers Cope	Beckenham High Street	Key Office Cluster
Copers Cope	Maybrey Works, Worsley Bridge Road	Mixed use including residential
Cray Valley East	St Mary Cray Primary School	Safeguarded as Education Land - remove from Green Belt and designate as Urban Open Space,
Cray Valley East	Old Maidstone Road (Council Site)	Traveller Site
Cray Valley East	Star Lane (Council Site)	Traveller Site
Cray Valley East	Trunks Alley, Hockenden Lane	Traveller Site
Cray Valley East	Adj Vinsons Cottages, Hockenden Lane	Traveller Site”
Cray Valley West	Crayfields Industrial Park	Key Office Cluster
Cray Valley West	Bromley Valley Gymnastics Club, Chipper field Road	Mixed Use Including Residential
Cray Valley West	Midfield School / Groveland site	School sites safeguarded for Education Use, removal from Green Belt and re-designation as Urban Open Space
Crystal Palace	Crystal Palace	Strategic Outer London Development Centre
Crystal Palace	James Dixon Primary School	Safeguarded as Education Land - remove from Metropolitan Open Land and designate as Urban Open Space,

Ward	Site	Recommended Designation/Allocation
Darwin	Higham Hill Farm, Layhams Road Keston	Locally Significant Industrial Site
Darwin	Kimberley Business Park, Blackness Lane	Locally Significant Industrial Site
Darwin	Meads Green, Millies View, St Joseph's Place, Layhams Road	Traveller Sites
Darwin	Keston Mobile Park, Layhams Road	Traveller Site
Darwin	Keston's Showman's Park, Layhams Road	Traveller Site (Travelling Showmen's Yard)
Darwin	Land at junction with Sheepbarn Lane	Allocate as Traveller Site (extending the Travelling Showmen's Yard Traveller Site)
Farnborough and Crofton	No new proposed allocations/designations	
Hayes and Coney Hall	Wickham Common Primary	Safeguarded as Education Land - remove from Green Belt and designate as Urban Open Space,
Kelsey & Eden Park	Langley Park Girls & Boys Schools	Safeguarded for Education Use, remove from Green Belt and designate as Urban Open Space
Kelsey & Eden Park	Former Co-op Sports Ground, Balmoral Avenue	Safeguard for Education Use (retained as Urban Open Space)
Mottingham & Chislehurst North	Castlecombe Primary and Youth Centre	School site safeguarded as Education Land - remove from Metropolitan Open Land and designate as Urban Open Space,
Orpington	Former Milk Depot, Bruce Grove	Mixed use including residential
Orpington	Knoll Rise	Key Office Cluster
Penge & Cator	Franklin Industrial Centre, Franklin Road	Locally Significant Industrial Site
Petts Wood and Knoll	No new proposed allocations/designations	
Plaistow and Sundridge	No new proposed allocations/designations	
Shortlands	No new proposed allocations/designations	
West Wickham	No new proposed allocations/designations	

Ward	Site	Recommended Draft Designation/Allocation
Parking Standards - Revised		
Bromley Town, Plaistow & Sundridge, Shortlands	Parking Area covering area including parts of wards focused on Bromley Town Centre with high public transport accessibility and good connectivity	Residential parking standards in 'conformity' with London Plan
Orpington, Farnborough & Crofton, Petts Wood & Knoll	Parking Area covering areas within wards focused on Orpington Town Centre with high public transport accessibility and good connectivity	Residential parking standards in 'conformity' with London Plan
Crystal Palace, Penge & Cator, Clock House, Copers Cope	Parking Area identified including areas within wards in the NW of the borough with high public transport accessibility and good connectivity	Residential parking standards in 'conformity' with London Plan
Borough-wide	Various extended, new and upgraded SINC	Extended, new and upgraded Sites of Importance for Nature Conservation (SINCs)
Bromley Common and Keston	Junction A232 Croydon Road and A233 Westerham Road and Oakley Road (Keston Mark)	Junction improvements

4.6 The consultation process will include the opportunity for comments on all the draft designations, policies and potential site allocations. Maps will be included where appropriate. However, where these are numerous and large in terms of complexity and electronic size they may be provided in a separate document for ease of reading and reference. A series of appendices will be attached and links to background documents and the evidence base. This includes information regarding all the sites submitted in response to the 'Call for Sites'. Sites assessed for potential housing or mixed use as part of the site assessment process but not recommended to be taken forward as potential site allocations in the consultation document are set out in Table 2.

Table 2 – Sites not recommended for housing/mixed use allocations

Ward	Site
Bickley	Bickley Manor Hotel, Thornet Wood Road, Bickley
Bickley	Former MOD Playing field, Thornet Wood Road, Bickley
Bickley	Land on Thornet Wood Road, Bickley
Bickley	Land fronting Blackbrook Lane, Bickley
Biggin Hill	Land at Highfield Road and Beech Road, Biggin Hill
Biggin Hill	Land adjacent to no.1 Norheads Farm Cottages, Biggin Hill
Biggin Hill	Land to the north of Norheads Lane, Biggin Hill
Biggin Hill	Land to the rear of Norheads farm Cottages, Biggin Hill
Biggin Hill	Land to the SE of Swivelands Road, Biggin Hill
Bromley Common and Keston	Jackson Road Nursery, Jackson Road, Bromley BR2 8NS
Bromley Common and Keston	Land west of Randolph Rd, Randolph Road, Bromley Common
Bromley Common and Keston	Land west of Randolph Rd (combined sites), Randolph Road, Bromley Common
Bromley Common and Keston	Potters Yard, Turpington Lane, Bromley Common
Bromley Common and Keston	Sea Cadets site, Hastings Road, Bromley Common
Bromley Common and Keston	Keston Garden Centre, Oakley Road, Keston
Bromley Common and Keston	The Drift, Croydon Road, Keston
Bromley Common and Keston	Land rear of properties in Fox Lane (Option 1), Keston
Bromley Common and Keston	Land between 57 & 67 Fox Lane (Option 3), Keston
Bromley Common and Keston	Land between 57, 67 (part), 67, 69 Fox Ln & The Granary Jackass Ln (Option 2), Keston
Bromley Common and Keston	Land on the North East side of Princes Plain, Bromley Common
Bromley Common and Keston	Oakley Farm, Oakley Road, Bromley Common
Bromley Town	Bromley Fire Station, North Street, Bromley
Bromley Town	Church House Gardens Depot, Church Road, Bromley
Chelsfield and Pratts Bottom	Land bounded by The Highway, Warren Road & Orpington Bypass, Chelsfield
Chelsfield and Pratts Bottom	Lillys Farm, Chelsfield Lane, Chelsfield
Chislehurst	Beaverwood Depot, Beaverwood Rd, Chislehurst
Chislehurst	Flamingo Park, Sidcup Bypass, Chislehurst
Chislehurst	Land on the North West side of Kemnal Road, Chislehurst
Chislehurst	Virgin Active Health Club, Sidcup By-pass, Chislehurst
Chislehurst	World of Golf, A20 Sidcup By-pass
Chislehurst	Land off Bushell Way
Clock House	National Grid Site, Churchfields Road, Beckenham
Copers Cope	Former Nat West Bank Sports Ground, Copers Cope Road

Copers Cope	SeGas sports ground, Worsley Bridge Road
Cray Valley West	Crayfields Business Park (Area 1), Main Road St. Pauls Cray
Cray Valley East & West	Crayfields Business Park (Area 2a), Main Road St. Pauls Cray
Cray Valley East	Crayfields Business Park (Area 2b), Main Road St. Pauls Cray
Cray Valley West	Crayfields Business Park adjoining open land (Area 3), Main Road St. Pauls Cray
Cray Valley East	Crayfields Business Park adjoining open land (Area 4), Sandy Lane, St. Pauls Cray
Cray Valley East & West	Crayfields Business Park adjoining open land (Area 5), Sandy Lane. St. Pauls Cray
Cray Valley East	Land rear of Tesco, Edgington Way
Cray Valley East	Land off Chapmans Lane, Chalkpit Avenue, St Paul's Cray
Cray Valley East	Ruxley Cottage, Maidstone Road
Cray Valley East	Lower Hockenden Farm, Hockenden Lane
Cray Valley West	Gasholder Station St Mary Cray, Lessons Hill/ Sevenoaks Way, St Mary Cray
Cray Valley West	Bournewood Quarry, off A20
Cray Valley West	Land fronting Sevenoaks Way, adjoining Ruxley Lakes
Darwin	Land north west of Leaves Green Road Keston
Darwin	Land at Leaves Green Road (A233) Keston
Darwin	Land to the south-east of Belvedere Road, Biggin Hill
Darwin	Land to west of Blackness Lane (Adj Foxley) Keston
Darwin	Layhams Farm, Layhams Road, Keston
Kelsey and Eden Park	Land at North End Drive
Orpington	Priory Gardens Depot, High Street, Orpington
Penge and Cator	Penge Auto Sprays, 85 Maple Road, Penge

- 4.7 As indicated earlier the Local Plan process requires particular stages and steps to be followed to be found 'sound' at the Examination in Public. This also applies to associated documents including the Infrastructure Delivery Plan and supporting documents to introduce a Community Infrastructure Levy to help deliver the Local Plan. The Council has to pay the costs of the Examination in Public together with the cost of the further consultation stages of the plan preparation and the production of evidence where gaps need to be addressed or updates required as circumstances change.

5 POLICY IMPLICATIONS

- 5.1 Bromley 2020 as the Sustainable Community Strategy for the Borough was the starting point for developing the Core Strategy Issues Document in 2011 and for the Vision and Objectives in the Options and Preferred Strategy stage of the Local Plan preparation. The Local Plan will extend this vision until 2031 and contributes to all the priorities within Building a Better Bromley. The Local Plan together with the London Plan will form the development plan for the Borough. The Local Plan, once adopted will replace the saved policies of the UDP.
- 5.2 The Local Plan has to be in general conformity with the London plan (March 2015) and with the National Planning Policy Framework published in March 2012. Importantly the Local Plan sets out the vision and objectives, and the policies against which planning applications will be determined (together with the London Plan) and the priorities against which the plan will be monitored and reviewed.

6 FINANCIAL IMPLICATIONS

- 6.1 The cost of the consultation process for this stage of the Local Plan is estimated to be in the region of £3k which will be funded from the local plan budget within Planning.
- 6.2 The Executive agreed a carry forward sum of £60k to fund the preparation of the Council's Local Plan in June 2015. The revised timetable in the Local Development Scheme agreed by the Executive in May 2015 indicated that the examination of the Plan will now take place during 2016. A further request may have to be made to the Executive to carry forward some or all of the £60k into 2016/17, in order to meet the future costs of the examination in public and to undertake any further evidence work required.

7 LEGAL IMPLICATIONS

- 7.1 The proposals are consistent with the planning legislation and regulations.

Non-Applicable Sections:	Personnel Implications
Background Documents: (Access via Contact Officer)	<p>Report No DR 14/002 DCC and Executive 'Draft Policies and Designations for Consultation'</p> <p>Report No DRR13/016 DCC 29/1/13 Bromley's Local Plan – Options and Preferred Strategy for Consultation</p> <p>Report to Executive 12/6/13 Growth and Delivery Plans for Bromley Town Centre, Biggin Hill and Cray Corridor Employment Areas</p> <p>Report No DRR13/082 DCC Report on Local Plan 'Options and Preferred Strategy' consultation June 2013</p> <p>Bromley 2020 Bromley's Community Strategy</p> <p>National Planning Policy Framework March 2012</p> <p>London Plan (March 2015))</p> <p>LBB UDP 2006 (Saved)</p> <p>Local Plan Evidence Base http://www.bromley.gov.uk/ldf</p>

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