



THE LONDON BOROUGH
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DATE: 17 January 2017

To: Members of the
DEVELOPMENT CONTROL COMMITTEE

Councillor Peter Dean (Chairman)
Councillor Richard Scoates (Vice-Chairman)
Councillors Vanessa Allen, Graham Arthur, Douglas Auld, Eric Bosshard,
Katy Boughey, Kevin Brooks, Lydia Buttinger, Nicky Dykes, Simon Fawthrop,
William Huntington-Thresher, Charles Joel, David Livett, Alexa Michael,
Neil Reddin FCCA, Pauline Tunnicliffe and Michael Turner

A meeting of the Development Control Committee will be held at Bromley Civic Centre on **WEDNESDAY 25 JANUARY 2017 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 24 NOVEMBER 2016 (Pages 1 - 8)**

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 5 pm on Thursday 19 January 2017.

5 PLANNING APPLICATION (16/03145/OUT) - SOUTH SUBURBAN CO OP SOCIETY, BALMORAL AVENUE, BECKENHAM BR3 3RD (Pages 9 - 108)

6 PLANNING APPLICATION (16/03315/FULL1) - ST HUGHES PLAYING FIELDS, BICKLEY ROAD, BICKLEY, BROMLEY (Pages 109 - 190)

7 PLANNING APPLICATION (16/04712/FULL1) - THE RAVENSBOURNE SCHOOL, HAYES LANE, HAYES, BROMLEY BR2 9EH (Pages 191 - 216)

8 ADDENDUM TO BROMLEY'S PLANNING OBLIGATIONS SUPPLEMENTARY PLANNING DOCUMENT (2010 AS AMENDED):- ESTABLISH CARBON OFFSET CONTRIBUTIONS - PAYMENTS IN LIEU OF ON-SITE PROVISION (Pages 217 - 222)

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DEVELOPMENT CONTROL COMMITTEE

Minutes of the meeting held at 7.30 pm on 24 November 2016

Present:

Councillor Peter Dean (Chairman)
Councillor Richard Scoates (Vice-Chairman)
Councillors Vanessa Allen, Graham Arthur, Douglas Auld,
Eric Bosshard, Katy Boughey, Kevin Brooks, Lydia Buttinger,
Nicky Dykes, Simon Fawthrop, William Huntington-Thresher,
Charles Joel, David Livett, Alexa Michael, Neil Reddin FCCA,
Pauline Tunncliffe and Michael Turner

21 APOLOGIES FOR ABSENCE AND NOTIFICATION OF SUBSTITUTE MEMBERS

There were no apologies for absence.

22 DECLARATIONS OF INTEREST

In relation to Minute 25, Councillor Allen declared that she was a Member of the Labour Party which used the HG Wells Centre.

23 CONFIRMATION OF THE MINUTES OF THE MEETING HELD ON 6TH SEPTEMBER 2016

RESOLVED that the minutes of the meeting held on 6 September 2016 be confirmed and signed as a correct record.

24 QUESTIONS BY MEMBERS OF THE PUBLIC ATTENDING THE MEETING

No questions were received.

25 PLANNING APPLICATION (16/02395/FULL1) - H G WELLS CENTRE, ST MARK'S ROAD, BROMLEY BR2 9HG

Description of application – Demolition of existing building and erection of a part 7, part 11, part 17 mixed use building comprising 210 sqm community uses (use class D1/D2), 42 sqm office use (flexible B1(a) and A3 use) and 68 residential flats with associated landscaping and public realm works, new

pedestrian links, refuse and cycle parking stores, plant room and 3 disabled parking spaces.

Oral representations in support of the application were received from Mr Mark Gibney on behalf of the applicants.

Mr Gibney stated that Members were familiar with the previous application which had been approved following appeal. The application now before the Committee was virtually identical however the applicant was seeking to replace office space into residential units. The issue of wheelchair access has been resolved earlier in the day and the applicant was proposing that four out of the proposed sixteen new residential units should be allocated as social housing. Mr Gibney reported that the site was ready to be developed. If approved the proposed application would make a valuable contribution to Bromley Town Centre.

In response to Member questions, Mr Gibney stated that following approval of the original application on appeal, and on review the applicant had felt that the development would be complicated with the office space that had been proposed and had therefore wanted to deliver more housing in the Town Centre. In relation to disabled parking bays and car club parking, Mr Gibney reported that the site was constrained in relation to additional disabled parking bays although additional on-street parking was available and essentially there was no demand for additional car club spaces as a result of the proposals. Finally, Mr Gibney reported that he had not been instructed by his client as to whether an appeal would be pursued in the event of the Committee refusing the application.

The Deputy DC Manager reported that through submission of updated plans and an updated accommodation schedule, the applicant had confirmed that the provision of wheelchair user dwellings within the development would be in accordance with the requirements set out in London Plan Policy 3.8 and the Mayors Housing SPG. The second reason for refusal as set out in the report was therefore removed from the recommendation.

Members expressed concerns surrounding the reduction in commercial floor space that was being proposed recognising the need for commercial floor space in the town centre. Concerns were also raised around inadequate disabled parking provision and inadequate provision of car club spaces. Furthermore, Members expressed concerns surrounding the lack of affordable housing provided by the proposed development.

The Chairman moved that the application be refused on the grounds outlined in the amended report tabled.

Members having considered the report and the update tabled at the meeting, objections and representations.

RESOLVED that PERMISSION BE REFUSED for the following reason:

1. Viability has not been agreed and the proposed development has not provided the required 35% provision of on-site affordable housing required under Policy H2 of the Unitary Development Plan and does not provide adequate justification for the proposed off-site payment in lieu, contrary to Policy H3 of the Unitary Development Plan (2006), Policy BTC3 of the Bromley Town Centre Area Action Plan (2010), Policies 3.9, 3.11 and 3.12 of the London Plan (2015) and Paragraph 50 of the National Planning Policy Framework (2012).

26 PLANNING APPLICATION (16/02613/OUT) - LAND AT JUNCTION WITH SOUTH EDEN PARK ROAD AND BUCKNALL WAY, BECKENHAM

Description of application – Residential development comprising of 105 units with a mixture of 4 bedroom houses and one, two and three bedroom apartments together with concierges office and associated basement car parking (outline application).

Oral representations in support of the application were received from Mr John Escott.

Mr Escott provided a brief history of the site. A Counsel's opinion that had been obtained by the applicant had been submitted to the authority. Mr Escott reported that he believed that an attractive scheme was in front of Members although he was aware that concerns had been raised round the number of proposed units. The applicant was willing to review the scheme if necessary and invited Members to defer consideration of the application to enable further review and consideration if necessary.

The Deputy DC Manager reported that following publication of the report, the following additional representations had been received in support of the application:

- A petition, containing 9 signatures, which confirms support for the development which will increase activity to shops and businesses in the parade in Wickham Road
- Additional comments from residents confirming their support for the proposed development which would provide new homes and is considered to be of a high quality and of benefit to the area

Representations had also been received from the West Kent Badger Group, confirming their agreement with the recommendations made in the ecological report submitted by the applicant.

The Deputy DC Manager confirmed that the Committee report had been updated, along with the recommended grounds of refusal, to cross reference relevant London Plan policies.

In opening the debate, the Chairman and Ward Member Councillor Peter Dean reported that he was familiar with the land and was aware of its history. It was the Chairman's personal feeling that the site has potential for development however there were two major objections. Firstly the land had been designated as Urban Open Space. The Chairman suggested the site was prime for development and as other areas of the Glaxo Wellcome had already been developed the precedent for this large piece of land had already been set. The Chairman further noted that any such development would represent a windfall for the housing supply. In this respect the Chairman would support development. The second objection related to over development of the site. The Chairman reported that he felt that 105 properties constituted inappropriate development which would also have an adverse impact on transport and infrastructure. As a result of this the Chairman moved that consideration of the application be deferred to enable the applicant to reconsider and revise the proposals before the Committee. A number of Committee Members supported deferral of the item indicating that this would give the applicant time to revise the proposals to allow more space between the houses and respect the openness of the land.

Councillor Scoates stated that he did not believe that the development in designated Urban Open Space should be permitted. Instead an application should be made to remove the designation. Only after the designation had been removed could an application such as this be approved. As a result of this Councillor Scoates recommended refusal.

Councillor Michael stated that she believed it was a matter of principle that the application be refused. The land was designated Urban Open Space and there were no circumstances which would justify building on the land and therefore the application should be refused.

In response to a question, the Chief Planner reported that the designation of the land is a matter for the Local Plan process. The Local Plan was currently out for consultation and it was envisaged that it would be adopted by the end of 2017.

In summing up, the Chairman noted that two motions had been put forward. The first motion for the Committee was to defer consideration of the item to enable the applicant to revise the proposals. The second motion was to refuse the application as it currently stood in line with the recommendations outlined in the update tabled at the meeting.

The Chairman moved that the application be deferred to enable the applicants to submit a revised proposal. Following a vote:

In favour: 8 Members
Against: 9 Members

The motion for deferral fell.

The Chairman moved that the application be refused for the reasons set out in the update tabled at the meeting. Following a vote:

In favour: 9 Members

Against 6 Members

The motion for refusal was carried.

Members having considered the report, objections and representations **RESOLVED that PERMISSION be REFUSED for the following reasons:**

1. The site is designated Urban Open Space in the Unitary Development Plan and Draft Local Plan and its development for residential purposes would be contrary to Policy G8, wherein there is a presumption against such development leading to the loss of open land that serves an important function in the locality and provides a break in the built up area, and contrary to London Plan Policies 2.18 and 7.18.

2. The development, as proposed, would result in a cramped overdevelopment of the site, out of character with and harmful to the visual amenities of the area and would fail to provide a satisfactory form of living accommodation for future occupiers contrary to Policies BE1 and H7 of the Unitary Development Plan and policies 7.4 and 7.15 of the London Plan and the Mayor's Housing SPG.

**27 LB BROMLEY FIVE YEAR HOUSING LAND SUPPLY PAPER -
NOV 2016
Report DRR16/086**

The National Planning Policy Framework (NPPF, March 2012) 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. The Committee considered a report setting out the five year housing supply position for the Council from 1st April 2016 to 31st March 2021. The report concluded that there was a suitable five year housing supply in the Borough.

Appendix 1 to the report set out the Borough's five year housing supply position (2016/17 – 2020/2021). This illustrated that the Borough could accommodate five years supply of housing through a variety of deliverable sites and had delivered sufficient completions over the past few years. As a result of this a buffer of 5% of units had been added to the Borough's overall five year target in line with the requirements of the NPPF to ensure choice and competition in the market for land. This included a small site allowance and relevant large identified sites and draft allocations.

The Chief Planner reported that since publication of the report the Council had received correspondence from Robinson Escott Planning LLP and Nathaniel

Lichfield & Partners. This correspondence was before Members in the packs of additional information that had been provided.

The Chairman noted that the established housing targets required in excess of 640 houses to be built across the Borough every year for the next five years and reported that he was more than happy with the sites and details that the Council's officers had put together in the Plan before the Committee.

In response to a question, the Chief Planner reported that an allowance was made in the figures provided for housing units above shops that were being brought back into residential use.

A Member stressed the importance of adopting the plan in order to provide confidence in the five year housing supply and reduce unwanted development across the Borough.

RESOLVED that the five year housing supply position from 1st April 2016 to 31st March 2021 as set out in appendix 1 of the report be agreed.

28 LOCAL DEVELOPMENT SCHEME 2016 -18 **Report DRR16/087**

The Committee considered a report seeking the agreement of Members to the Local Development Scheme (LDS) for 2016-18. The current legislative requirements for the LDS were to only include the development plan documents (DPD) which were subject to independent examination which for Bromley would be the Borough-wide Local Plan and the review of the Bromley Town Centre Area Action Plan which would follow the adoption of the first document. The Local Development Scheme also set out an indicative timescale for the preparation of a local Community Infrastructure Levy and a new Planning Obligations Supplementary Planning Document (SPD).

It had been anticipated that the planning and housing reforms including a revised National Policy Framework would have been published over the summer, however, while some parts had been produced details of the Starter Home Initiative and the revised NPPF had been delayed. The revised timescale in Appendix 2 to the LDS showed the proposed Submission Draft Local Plan consultation in November/December 2016 with submission to the Secretary of State in early 2017 and adoption of the Local Plan by the end of 2017.

The new Local Development Scheme sought to reflect (i) recent Government planning reforms and anticipate the work involved from any future changes, (ii) the Council's resources and lessons learnt from other authorities and Inspectors' reports regarding timescales, and (iii) the increased burden on authorities to demonstrate that plans were based on objective and up-to-date evidence to be found 'sound'. There was a requirement for the Local Plan to be in conformity with the London Plan which formed part of the Development Plan for the Borough.

The LDS outlined the further evidence required to support the Local Plan making process and ensure soundness, along with the risks and measures to mitigate these. The draft LDS also set out the timescale for the preparation of a Bromley Community Infrastructure Levy (CIL). The third set of CIL regulations increased the consultation period for each stage of the preparation of the charging schedule for CIL to six weeks, and again increased the burden for evidence of viability and the proposed infrastructure to be funded based on an up to date development plan. On this basis the LDS showed the CIL Examination following closely after the Local Plan Examination.

RESOLVED that the Executive be recommended to approve the revised Local Development Scheme for 2016-2018 as the formal management document for the production of the Bromley Local plan and the review of the Bromley Town Centre Area Action Plan

The Meeting ended at 8.21 pm

Chairman

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Agenda Item 5

Application No : 16/03145/OUT

Ward:
Kelsey And Eden Park

Address : South Suburban Co Op Society
Balmoral Avenue
Beckenham
BR3 3RD

OS Grid Ref: E: 536356 N: 168111

Applicant : E21C

Objections : YES

Description of Development:

Outline application for the erection of 2 buildings of two to three storeys comprising 13,508 square metres (Gross External Area) of Class D1 floorspace to provide an 8 form entry plus 6th form school (up to 1,680 pupils) and sports hall, 17,200 square metres for playing fields, 2,190 square metres Multi Use Games Area with community use and associated development including car parking spaces, cycle parking spaces, floodlighting, new pedestrian and vehicular accesses, servicing and storage.

Key designations

Biggin Hill Safeguarding Area
London City Airport Safeguarding
Smoke Control SCA 15
Urban Open Space

Proposal

Outline planning permission is sought for a new 8 form entry (FE) secondary school Eden Park High School plus a sixth form accommodating a total of 1,680 students (1200 secondary pupils and 480 sixth form pupils) and approximately 120 staff by the time the school is fully occupied in 2023. The proposed school would be operated by the E21C multi-Academy Trust which includes Ravensbourne School, Hayes.

The application seeks determination of the scale, layout and access at Outline stage with appearance and landscaping retained as reserved matters for later consideration.

There is no temporary accommodation for pupils proposed in this application as this is the subject of a separate application on a different site. Members should note that an application for the temporary siting of a two-storey structure for educational use (Class D1) for two academic years (until 31 July 2019) and associated external works including access ramp and stairs at Ravensbourne School for Eden Park High School (ref 16/04712) also appears on this Agenda.

The form of development will comprise the following elements:

Building and Works

- The main school building will be U shaped and located in the south east corner of the site. It will comprise 12,067 sqm (gross external area (GEA)) of floorspace spread over 3 storeys and the building will be 12.9m high. The width of the northeast elevation of the building will be approximately 61m and the wings will extend 87m and 93 m respectively. Between the wings will be a communal open space designed to be an informal recreation space for pupils including an outdoor dining space.
- The sports hall will be located close to the eastern boundary and will comprise 1400 sqm (GEA) of floorspace. The building will be 9m high and measure 42m by 42.8m.
- Both buildings will be flat roofed. Details of the appearance of the buildings have not been provided as the applicant has requested these to be dealt with as reserved matters
- The total GEA for the school buildings is 13,508 sqm.
- The boundary to the overall site will comprise partly a 1.8m palisade fence and partly a 1.8m acoustic boundary fence.
- The site levels reduce by approximately 3m across the site from the southern boundary towards Balmoral Avenue.

Car and cycle parking, servicing and access arrangements

- There are 2 vehicle access points shown on the submitted plans.
- A new one way entrance is shown set back from the eastern side of the Balmoral Avenue frontage. The gates to this access will be set back approximately 5m from Balmoral Avenue.
- A secondary vehicle access for exit only is proposed centrally within the site frontage. The configuration of this exit will be designed to prevent right turn from this exit.
- There are 2 pedestrian access points shown on the submitted plans
- A dedicated pedestrian/cycle access point is provided at the western end of the frontage and the entrance is set back to provide a wider pavement at this point. A dedicated pathway will around the top of the car park and follow the internal access road to the main school buildings.
- A further pedestrian entrance will be provided adjacent to north eastern boundary and will link to the pathway to the school buildings. A zebra crossing will be provided where this path crosses the main internal access road to the school buildings.
- 2 car parks are proposed as follows:
 - The main car park is located to the rear of the site along part of the eastern and southern boundaries and near the main entrance to the school. It provides 58 parking bays, plus 5 disabled spaces and 4 larger spaces for mini bus parking.

Access to this car park will be via a straight single width carriageway with several passing places along the eastern boundary.

- A secondary car park (the frontage car park) is located along the northern boundary adjacent to Balmoral Avenue. This will provide car parking spaces for 40 vehicles and a drop off zone is provided for single storey coaches.
- Total number of spaces is 103 for staff and visitors plus 4 minibus spaces.
- A substation building is also shown within the frontage car park
- 242 cycle parking spaces will be provided in a covered store on the north side of the main school building.
- A plan has been submitted showing access capability for refuse, delivery and emergency vehicles.

Trees and landscaping

- The Tree Survey identifies the removal of 2 Category C trees and 20 Category U trees (the U category trees should be removed for arboricultural reasons irrespective of the development). Three hedges located internally within the site will also be removed.
- No Category A or B trees will be removed
- The row of mature and semi-mature Hornbeam trees along the eastern boundary require a reduction in the crown branches for good arboricultural management. The proposed building is shown to be set back 17.5m from this boundary.
- The row of mature and semi-mature lime trees along the western boundary have significant deadwood throughout the crowns which should be removed for good arboricultural management.
- Details of proposed landscaping have not been submitted as these will be considered as reserved matters should the planning application be approved. The Design and Access statement advises that buffer planting will be provided to reinforce the boundaries and bat and bird boxes located across the site. Also, internal landscaping will be provided to the communal areas.

Outdoor sports facilities

- 1 full size football pitch (9,650 sqm including run off). This will be located along the eastern boundary between the frontage car park and the sports hall and will be enclosed by a 1.2m fence. The pitch will be used by the school on weekdays and weekends with floodlighting until 18.30 on weekdays only.
- 1 multi-use games area (MUGA) (2,190 sqm) with court markings will be located in the centre of the site adjacent to the main school building and sports hall. The MUGA will be enclosed by a 3m weld mesh fence. The MUGA will be available for out of hours community use at evenings and weekends (the latter daytime only) and will be floodlit until 21.00 on weekdays. 2

- 2 Under 13/14 grass football pitches (3,760 sqm including run off) will be located along the western and part of the northern boundaries respectively.
- 2 grass training areas (25mx25m each) will be located near the southern and eastern boundaries respectively
- The total floorspace for outdoor recreation facilities will be 17,200 sqm.

Application Submission

The applicant has submitted the following documents to support the application:

Planning Statement: This statement seeks to describe the site and surrounding area and sets out the applicant's case in support of the proposal explaining how it addresses the development plan policy requirements and other material considerations.

Design and Access Statement: This statement sets out an assessment of the site and surrounding area and the rationale for the proposal having regard to relevant development plan policies. The statement confirms the amount of development proposed, parking strategy, refuse and sustainability strategy. The statement discusses the approach to access, landscaping and appearance of the development.

Landscape and Visual Impact Assessment: This report provides an analysis of the landscape effect and the visual impact of the proposed development. In terms of landscape effect the report concludes that this will be neutral. In terms of the visual effect there are 7 locations around the site where the development will have a substantial or moderate/substantial effect, the majority of which are at close range. The report suggests mitigation measures in the form of planting and sensitive use of materials for the building fabric and internal fence lines.

The landscape is defined as medium value at a local level. The site appraisal advises that whilst the proposal will cause change to the immediate landscape character of the site, the impact will be very local and within the wider urban townscape there will be very little change. Therefore, the landscape effect is defined as neutral in this respect.

In terms of the visual impact of the development the report finds there is substantial or moderate/substantial impact from the following viewpoints, the majority of which are at close range with one medium range:

- From rear upper windows of properties at 155-195 Upper Elmers End Road
- Upper windows of properties in Mountbatten Close
- From properties number 86-62 on the northern side of Balmoral Avenue
- Upper rear windows of properties along southern side of Eden Park Avenue
- Upper windows of 3 properties on east side of Stanhope Grove.

- Views from boundary fence with Stanhope Grove Playing Fields and Beckenham Rugby Club pitches

The report considers mitigation measures and comments on the effectiveness of these measures. The level of significance is primarily due to the site's location in a built up residential area and 5 of the affected viewpoints are from upper floor windows of adjacent properties that have views into the site, particularly during winter months. Whilst the effect is significant it is localised to these residents and will be less substantial when tree canopies are in leaf. Mitigation measures include sensitive selection of materials for the building fabric and internal fence lines and planting of trees and shrubs will provide more effective screening once they have become established.

Transport Assessment and associated documents: The original TA has been updated since the original submission with later documents from the applicants Highway Consultant on November 28th and December 21st 2016. A draft School Travel Plan was received on January 3rd 2017.

A detailed Transport Assessment has been submitted which includes descriptions of the existing road network, on-street parking survey, local walking and cycling facilities, traffic surveys for junctions at Balmoral Avenue/Upper Elmers End Road, Balmoral Avenue/Eden Park Avenue, Eden Park Avenue/Croydon Road and Dunbar Avenue/Eden Park Avenue, on-street parking survey and accident data. The report also shows junction details and vehicle swept paths for emergency access and deliveries.

For the proposed development, the main vehicle entrance will be adjacent to the northern boundary of the Balmoral Avenue site frontage with a further separate exit only egress in the approximate centre of the site. The main car park for staff and visitors will have 63 car spaces (including 5 disabled bays) and 4 mini bus spaces and will be located adjacent to the main school building. A smaller car park for staff and visitors with 40 spaces will be located adjacent to the frontage of the site with a coach drop-off and pick-up lay-by at the rear of the car park. This area will also be used for dropping off and picking up pupils but there will not be the facility to park within the site as the frontage spaces are for staff parking only.

There will be a dedicated pedestrian access from Balmoral Avenue alongside the western boundary with another on the eastern boundary alongside the vehicle entrance roadway to serve pupils coming from the north and the south and to avoid pupils crossing proposed vehicle access and egress points. Pupils will then use a dedicated footway alongside the main internal access road to reach the school buildings. The report indicates that there are a sufficient number of car parking spaces to accommodate all predicted staff parking.

The applicant advises that the full capacity of the school will be up to 1680 pupils with numbers gradually increasing year on year from September 2019 until the school is fully operational in 2025. The school is non-selective and

open to all applicants. The school operating hours will be 08.30 to 17.30. The applicant has advised that 6th form pupils will leave at 5pm.

The peak times for traffic activity will fall within the periods of 0745 to 0845 and 1700 to 1800. The site has a PTAL rating of 3 at the school gate and 1b at the main school building entrance.

In terms of proposed traffic levels, a 'hands up' survey at Ravensbourne School has been used to determine the number of staff and pupils that will use car borne modes of transport. For pupils, the report forecasts 227 car arrivals and departures along Balmoral Avenue, Upper Elmers End Road and Eden Park Avenue in the AM peak and 182 in the PM peak. The applicant predicts that this will be reduced to 89 in the AM peak and 50 in the PM peak when the Travel Plan is fully in place.

In terms of on-street parking, the worst-case scenario for when the school is running at full capacity would result in a demand for 227 spaces in the AM peak and 182 in the PM peak, assuming that all car borne pupils arrive and depart at the same time. The on-street parking survey provided by the applicant indicates that there would be an average of 102 vacant on street spaces in the AM peak and 114 in the PM peak. The applicant has advised that there is other on-street parking in the wider area. Taking this into account there would sufficient on-street spaces but they would be spread further away from the school. This does not take account of the potential drop/off and pick up within the frontage car park on the site which would provide off street space for approximately 150 to 225 drop offs. Taking this into account it is considered that there would be sufficient space to accommodate the predicted car borne pupils. The applicant also predicts that the demand referred to above would be reduced through the school Travel Plan.

In terms of the impact on the highway network, 4 junctions (listed above) were assessed for existing and predicted capacity, delays and queuing. The report finds that the Eden Park Avenue/Croydon Road junction is already over capacity in terms of queuing traffic for two 15 minute period in the AM peak. Taking account of vehicle generation for pupils only this would increase the length of queues at this junction for two 15 minute periods in the AM peak. The applicant advises that this will reduce once a Travel Plan has been approved and implemented.

Revised plans have been submitted showing an amended layout to the exit only access which will prevent right turn from this exit resulting in left turn only manoeuvre into Balmoral Avenue. This will direct traffic using the on-site pick up and drop off facility away from the Balmoral/Eden Park Road and Eden Park Road/Croydon Road junctions. Revised traffic flow data has also been submitted to assess the impact of this alteration on these junctions and the Balmoral Avenue/Upper Elmers End Road junction.

A total of 242 cycle spaces will be provided.

The impact of the proposed community use is assessed in the document dated November 28th 2016. Community use will start at 18.00 and the site will be cleared by 21.30 on weekdays and from 09.00 to 16.00 on Saturdays and Sundays. The applicant predicts that use of the school hall and dance studio could generate up to 80 people and the MUGA could generate up to 72 people at any one time totalling 152 people, if each of these facilities was being used to its maximum extent at the same time. It is not proposed that the grass pitches would be used for community use in the evenings or weekends.

Road Safety Audit and Designers Response: This relates to the new site access and egress to Balmoral Avenue only and recommends the relocation of gullies away from the junction bellmouths, review of the impact of street trees on the junction visibility, footways should be provided where vehicle accesses can be used by pedestrians. The designer's response is that the gullies will be relocated, the location of trees that could affect the junction will be identified and the trees relocated or their foliage reduced where necessary and speed humps on the site accesses close to the footway will be provided to minimise vehicle speeds as they approach the path of any pedestrians crossing the junctions.

Travel Plan: The Travel Plan seeks to encourage staff and pupils to use alternative sustainable means of travel to and from school in such a way as to reduce car borne trips. The Travel Plan Coordinator appointed by the school will work with the Council's Travel Plan Officer to identify measures to achieve this objective. This will apply to the temporary school and this will set the ethos for good practice at the permanent school when it opens.

It should be noted that Ravensbourne School (operated by the applicant) already operates a Travel Plan that has been awarded a Gold accreditation under the 'STARS' programme and the experience of this school will be passed on to Eden Park High School staff and demonstrates the commitment of the Trust have in improving sustainable travel.

The plan does refer to the possibility of staggering the start and finish time of sixth form pupils when they are introduced to Eden Park High School to help disperse arrival and departure activity from the peak period.

Surface Water Drainage Strategy: The aim of the SWDS is to demonstrate the site can manage the surface water runoff from the new development in such a way to mitigate the impact of the new development on adjacent property. Following comments from the Council's Drainage Officer, a revised Surface Water Strategy was received in December 2016 which provided additional information.

The desk top 'Flood Risk Assessment' study has identified that the proposed development is located mostly in Flood Zone 1, with a small area within Flood Zone 2 and 3. It can be concluded that, providing the recommendations in the assessment are adhered to (subject to BRE365 tests), the proposed educational development will be safe from flooding hazards, not impede the

path of flood water, and it will remain safe for its lifetime while not increasing flood risk elsewhere. Their recommendations are:-

- Finished ground floor levels should be set no lower than 37.66m AOD or 150mm above ground level, whichever is greater to mitigate the risk of fluvial flooding.
- Detailed surface water drainage strategy be developed.
- Surface water be managed by feasible SuDS. Should infiltration prove unfeasible, 1,888m³ storage should be provided and discharged at 5.1l/s.
- Occupants should sign up to receive flood warnings from the Environment Agency to give them advance notice of flooding that may affect the local area.

The development proposals within this report are considered to be compliant with national, regional and local planning policy, as well as the Non-Statutory Technical Standards for Sustainable Drainage Systems published by DEFRA and the Lead Local Flood Authority (LLFA) requirements

Flood Risk Assessment: This report confirms that the majority of the site is located within Flood Zone 1 (an area with low probability of flooding). A triangle of the land located along the western boundary of the site is located in Flood Zone 3a and this land is more vulnerable to flooding. A culverted section of the Chaffinch Brook watercourse is situated along the banked railway line which borders the western boundary to the site. The report discusses the potential risks of flooding at the site and confirms the drainage strategy.

The report notes that

- The buildings have been located in the part of the site with the lowest area of flood risk, namely Flood Risk 1
- Any fluvial risk to the building can be mitigated by setting finished floor levels no lower than 35.91AOD or 150mm above the existing ground level, whichever is the greater and this will protect against medium risk of groundwater flooding.
- Surface water run-off can be effectively managed through the incorporation of Sustainable Urban Drainage Systems into the final drainage design.
- The report concludes that, providing the recommendations in this assessment are adhered to, the proposed educational development will be safe from flooding hazards, not impede the path of flood water and it will remain safe while not increasing flood risk elsewhere.

Following objections from the Environment Agency, a revised FRA dated 8th November 2016 and an Exception Test report have been submitted which consider the range of flooding events including extreme events on people and property using the most up to date site specific modelled flood levels and takes account of climate change.

Air Quality Assessment: The report considers that potential impacts of existing and future traffic levels on the application site. The impact of vehicle

emissions will be tested using techniques in the Design Manual for Roads and Bridges and the Local Air Quality Management Technique Guidance and the ADMS-air dispersal model. The report does not assess the potential impact from any proposed heating system.

In terms of vehicle emissions, the predicted concentrations of PM10 and NO² are below the relevant objectives across the proposed development site and fall within the APEC Category A, which states that there are no air quality grounds for refusal, however, mitigation of any emissions should be considered.' Based on the predicted mean PM10 and NO² concentrations are unlikely to be exceeded and the impact on playground facilities will be acceptable in terms of the likely short term effect.

In terms of activity associated with construction activities, the impact of dust can be reduced to negligible through appropriate mitigation measures which are summarised in the report.

Energy and Sustainability Report: Energy efficiency measures have been implemented to provide carbon saving in comparison to the Target Emission Rate regulated emissions. The energy efficiency measures include: improved fabric insulation, improved air tightness, high efficiency ventilation systems, high efficiency heating and cooling, and low energy lighting with daylight dimming.

These standards require an improvement in Carbon Dioxide (CO²) emissions of the new building of 35% over Part L 2013 of Building Regulations and identification of the feasibility of a range of potentially suitable renewable energy technologies. Local Plan requires for a 20% reduction from renewable energy wherever feasible.

For renewable provision a Photo Voltaic system was identified as the most technically viable solution for the site to both provide renewable energy and meet the carbon reduction requirements of the London Plan. Initial calculations show a total site carbon reduction of 136.989 tonnes per year will be achieved from the energy efficient measures and PV panels and equates to an overall 35% reduction. Continued design work is required as the project evolves.

Noise Assessment: The report considers the noise climate on the site, taking into account the noise sources around the site on the proposed use and buildings. The report concludes that the climate is entirely suitable for use as a school. Suitable internal ambient noise levels will need to be provided to internal accommodation through appropriate design of the external building fabric.

The report recommends numerous measures to achieve the required noise levels including, acoustic glazing, façade and roof construction, locating sensitive receptor uses in the school away from the part of the building close to the railway, internal ventilation to sensitive rooms where open windows will result in too much noise intrusion, setting of suitable limits for plant noise

levels, acoustic barriers along the majority of the site boundary adjacent to residents and panelling around the MUGA to prevent potential noise from ball impacts.

External Lighting Assessment: This report considers the impact of proposed lighting spill and light pollution from safe levels of lighting that are needed to illuminate the site and from floodlighting proposed for the rugby pitch and MUGA. Following comments from the Council's Environmental Health Officer regarding the proposed floodlighting installations a revised report was received in November 2016.

The performance objective is to provide adequate illumination for safe access for building users to satisfy the local authority/planning requirements and Secure by Design. In addition it is proposed to provide floodlighting to the MUGA and rugby pitch to provide adequate illumination for their safe use for sport and satisfy the local authority/planning requirements.

The local area contains residential properties and the scheme needs to address this issue in respect to light spill and light pollution. The car parks and access roads will generally be illuminated by low level bollards and bulkhead luminaires which adopt LED and flat dichroic glass to maximise control of unwanted upward light spill and light spill to adjoining areas. Low level bollards have been introduced to achieve the desired low lighting levels to ramps and walkways. Luminaires shall be mounted over each entrance/exit doorway with emergency modules as required.

In addition it is proposed to install floodlighting to the MUGA and the rugby pitch. The outline strategy has been calculated using discharge light sources, due to a lack of technical and performance data for LED floodlighting luminaires from manufacturers. At detailed design the feasibility for installation of LED floodlighting will be investigated with a specialist contractor.

BREEAM Pre Assessment: This report assesses the proposals against the BREEAM criteria and concludes that the development would meet a minimum 'Very Good' standard based on the number of targets that are currently achieved and possibly an 'Excellent' standard for potential credits that may be achieved.

Statement of Community Involvement: The Statement advises that 2 public exhibitions were held in March and May 2016 as part of the pre-application process. Ward Councillors and residents and a total of 68 people recorded their attendance at the meeting in March and 60 people in May. The applicant also met with councillors, local residents, community groups and neighbouring schools and followed the Planning pre-application process.

Extended Phase 1 Habitat Survey, Bat Activity Report and additional Badger Inspection Report: The reports advise that the site is of medium ecology value and will have a minor impact upon the site. The reports are summarised below.

- A Phase 1 Habitat Survey has been undertaken which included a Protected Species Assessment
- The site is not within 2km of any statutory or non-statutory designated sites for nature conservation.
- There is no evidence of Badgers, Otters, Water Vole, Great Crested Newts, Reptiles or Hazel Dormouse being present within the study area.
- There are 9 desk based records of bats within 1 km of the site and the site is considered to be of moderate value for foraging and of negligible bat roost potential.
- The Phase 1 report recommends that a further dedicated bat survey is carried out. This has been completed and submitted.
- The Bat Activity Report concludes that the site is regularly used by moderate numbers and variety of bat species for foraging and as a commuter route, particularly along the western and southern boundary trees. The site is of moderate value to bats in the local area.
- To protect the bat habitat the report recommends retaining and replacing vegetated boundaries, limiting the impact of light pollution, including wildlife friendly planting in the landscaping scheme and provision of bat boxes.
- A fox earth was identified along the southern section of the boundary but on inspection it was found to have collapsed. A further specialist Badger Inspection report finds that there is limited foraging activity and paw prints and hairs were still present. A new series of holes have been found along the northern boundary but these are shallow and a short distance into the ground. At no time were any badger prints, hair, trackways or dung pits found within the site.
- Any vegetation removal or tree works should be carried out outside the bird nesting season to avoid impacting on nesting birds. If not nests with eggs should not be disturbed until birds have fledged. This will ensure that there is no major impact on breeding birds which may occupy any of these features.
- The Habitat Report advises that the impact of the development in terms of biodiversity can be offset by enhancement measures associated with landscaping and inclusion of bat and bird boxes and ecological areas on the site.
- Landscaping should include native trees and shrubs and use wild flower seed mix.

Tree Report: This report, which was carried out in February 2016, has identified all of the trees on the site and considers the impact of the development on the trees and measures required for tree protection. The key arboricultural features are

- The row of mature and semi mature lime trees along the west boundary
- The mature oak trees on the south boundary
- The mature and semi mature hornbeam trees on the east boundary

A total of 92 trees were surveyed with trunk diameters over 75mm.

- There are no Category A trees and no Category B trees assessed for removal

- Two Category C trees have been assessed as requiring removal and will be removed for the development. These trees are situated within the site on the boundary with the railway embankment
- Twenty two individual Category U trees are designated for removal as they are dead or should be removed for safety reasons.
- Three hedges are to be removed for the development.

The report concludes that the arboricultural impact of this scheme is negligible and will not constitute any long term threat to the character of landscape of the proposed school grounds. Tree Protection measures are recommended.

Location

The application site is located on the south-eastern side of Balmoral Avenue and comprises around 4.6ha of open land which was formerly used by the South Suburban Co-Operative Group as a sports ground with sports pitches. A bowling green was also laid out on the site. The site is adjoined by the Beckenham Rugby Club to the north east and the David Lloyd Leisure Centre to the east, both of which are also designated Urban Open Space. The site is immediately adjoined by residential development to the north-west and west in Balmoral Avenue, Mountbatten Gardens and Upper Elmers End Road. To the south is an elevated railway line with residential properties beyond in Lloyds Way.

Balmoral Avenue is mainly residential in character and the site lies at the western end of the road closest to Upper Elmers End Road.

Part of the western edge of the site falls within Flood Zones 2 and 3.

The site is designated Urban Open Space (UOS).

There is a woodland or group Tree Preservation Order (TPO) protected trees within the southern railway embankment that adjoins the southern boundary of the site.

The site is not within a conservation area or within any designated areas of interest for nature conservation and there are no statutory listed or locally listed buildings in the vicinity of the site.

The site is within an area rated as having a public transport accessibility level (PTAL) of 3 at the front gate (on a scale of 1 to 6 where 6 is the most accessible) and 1b adjacent to the main building.

Consultations

Comments from Local Residents

Nearby properties were notified and 127 representations objecting to the proposal, including representations from West Beckenham Residents

Association, and 39 representations in support have been received at the time of writing this report.

In addition, a petition with over 480 signatures has been submitted in support of the development. The comments received are summarised below.

Objections:

Objection comments have been received which are summarised as follows (all representations are available on file and have been considered in the production of this report):

- Junction of Upper Elmers End Road, Elmers Green and Croydon Road is heavily congested at rush hour.
- Adverse impact on Eden Park Avenue/Croydon Road will affect both right and left turns as there is only 1 lane here.
- Significant loss of amenity and adverse impact on the character of the area from the additional traffic dropping of and picking up in Balmoral Avenue
- On street car parking demand from Marian Vian Primary School in Shirley Crescent already spills into Balmoral Avenue and causes chaos. Additional traffic from EPHS will push cars further away into surrounding streets which will impact more residents
- The capacity of buses to move children to and from the school is not enough – they are already overcrowded at school opening and closing times and crowds of tired children trying to get home could create an unpleasant atmosphere for residents.
- No. 367 bus is a single decker bus as Eden Park Avenue can only take single decker buses
- The TA relies too heavily on projected targets of reduced car use when calculating the number of vehicle movements in the area and parking demand on Balmoral Avenue
- The TA relies on parking spaces in Eden Park Avenue which cannot be used as the road is too narrow and parking would block traffic.
- School children on bikes use the pavement which is dangerous for pedestrians
- Number of parking spaces for staff is far too high – they should use public transport
- More children should walk to school
- Noise, pollution and light pollution from additional cars.
- Vehicle access to the site from Balmoral Avenue is unacceptable as the road is too narrow
- Width of Balmoral Avenue is incorrect on OS extract making it look wider than it is whereas it is narrower and not able to deal with extra traffic.
- Pupils walking along Upper Elmers End Road is dangerous as there will be a lot of them, the road is very busy so crossing will be dangerous and a lot of children on the pavements waiting for buses will be dangerous

- Anymore traffic on Balmoral Avenue will mean residents cannot get out of Osbourne Close where there is no alternative access.
- Additional traffic will lead to greater congestion and more accidents as people take risks to avoid queues
- Contractor can't regularly clean the road during construction so road will be messy and slippery.
- Traffic survey should have been carried out over several days to get a clear picture of existing traffic movements. Mode of transport data is 2011 and show of hands relates to a school with a smaller catchment area.
- Concern about reliability of some of the data in the TS especially relating to projected car generation as site will have a wide catchment area, number of existing parking spaces available in the area and walking distances for park and stride/walking pupils.
- Concern that school will try to open a new entrance to Stanhope Grove which will increase pupil and car numbers in this road.
- Maybe have a one way system and resident only parking to discourage parents using cars to drop off children
- Traffic congestion is severe when Beckenham Rugby Club have matches so a whole school worth of vehicles will cause chaos and gridlock.
- No allowance made for large numbers of parents visiting the school on parents evening or for school events.
- Right turn from site into Balmoral Avenue will add congestion at the junction of Balmoral Avenue and Upper Elmers End Road and cause severe congestion in Balmoral Avenue which is not wide enough for cars to pass each other when road has parked cars on each side.
- Junctions that are already overcapacity should have improvements made to them.
- No confidence that the Travel Plan will reduce car borne journeys

Specific concerns relating to traffic and highways raised in comments:

- Junction of Upper Elmers End Road, Elmers Green and Croydon Road is heavily congested at rush hour.
- Adverse impact on Eden Park Avenue/Croydon Road will affect both right and left turns as there is only 1 lane here.
- Significant loss of amenity and adverse impact on the character of the area from the additional traffic dropping of and picking up in Balmoral Avenue
- On street car parking demand from Marian Vian Primary School in Shirley Crescent already spills into Balmoral Avenue and causes chaos. Additional traffic from EPHS will push cars further away into surrounding streets which will impact more residents
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- No confidence that the Travel Plan will reduce car borne journeys

Support

- Growing need for school places in the area creating demand for this new school.
- The Council has identified the need for 4 additional schools to meet growing demand for school places
- New school offers greater choice in this area and will meet needs not met by other schools. Also there is a shortage of senior schools for boys in the area
- It will provide spaces for areas where there is a shortage of spaces, including Clock House and Kent House.
- Support the ethos of the Ravensbourne School, which is part of the E21 group
- Some disruption to residents is outweighed by increased house values resulting from the introduction to a good school in the area
- Highways problems will be limited to term time for a short time each day and the need for the new school outweighs this inconvenience.
- Makes good use of land that is no longer in its original use
- Site is well suited and accessible for education use
- Support for the temporary accommodation for Eden Park High School
- Support new school but want to see maximum amount of green space retained

Comments from Consultees

Highway Authority:

Initial comments from Highways were as follows:

“The application site is located adjacent to the Beckenham Rugby Football Club and it is designated as Urban Open Land. The site fronts onto Balmoral Avenue; an existing vehicle access and pedestrian access is provided for the site on to Balmoral Avenue. The site is bounded by Balmoral Avenue to the west, residential properties to the south east, railway line to the south, David Lloyd Gym to the East and Eden Sports Ground (Beckenham Rugby Club) to the north. The PTAL rating has been calculated from the school gate on Balmoral Avenue, returning a PTAL rating of 3, and from the entrance to the school building which has a PTAL rating of 1b.

Vehicular access is proposed from Balmoral Avenue with 103 parking spaces provided for staff and visitors together with facilities for drop-off / pick-up within the site adjacent to Balmoral Avenue. A small car park of 40 spaces with a coach drop-off / pick-up layby is proposed on the Balmoral Avenue frontage together to the front of the site with a larger car park of 63 spaces

(inclusive of 5 disabled bays) plus 4 spaces for mini buses situated to the rear of the site, adjacent to the school building. The main vehicular entrance will be adjacent to the northern boundary of the Balmoral Avenue site frontage with a further separate exit only egress from the car park on to Balmoral Avenue in the approximate centre of the site frontage. Pedestrian and cycle access is proposed from Balmoral Avenue to the school building which is located at the southern part of the site frontage. It is also intended to widen the footway along Balmoral Avenue site frontage. This is acceptable. However the applicant is required to carry out all the recommendations prescribed in the safety audit report.

On-Street Parking

The streets immediately surrounding the site have unrestricted on-street parking, with the exception of single / double yellow lines on Eden Park Avenue.

Traffic Surveys

Fully classified junction turning counts have been commissioned at the junctions of Balmoral Avenue / Upper Elmers End Road (A214) (Priority Junction), Balmoral Avenue / Eden Park Avenue (Priority Junction), Dunbar Avenue / Eden Park Avenue (Priority Junction) and Eden Park Avenue / A222 Croydon Road (Priority Junction) which were undertaken on Tuesday 15th March 2016 for weekday AM and PM periods between the hours of 0700-0930 and 1430-1830.

The highway network peak hours from these counts is considered to be 0745-0845 and 1600 – 1700. The two way vehicular traffic flow on the Balmoral Avenue to the north (at its junction with Eden Park Avenue) was 291 vehicles (two way) in the AM Peak and 183 vehicles in the PM Peak and to the south (at its junction with Upper Elmers End Road) 318 vehicles (two way) in the AM Peak and 196 vehicles in the PM Peak. The peak times for the school are considered to be fall within the periods 0745 to 0845 and 1700 to 1800. These are based on 30 mins each side of 0815 when pupils are recommended to be on site for registration at 0830 in the morning and 30 mins each side of 1730 when pupils finish the extended school day. At 1700 to 1800 the two way traffic flow on Balmoral Avenue to the north (at its junction with Eden Park Avenue) was 158 vehicles (two way) and to the south (at its junction with Upper Elmers End Road) 162 vehicles (two way).

On-Street Parking Survey

An on-street parking survey has been undertaken on Tuesday 15th March 2016 during the periods 0730 to 0930 and 1530 to 1830 with 30mins intervals and 0800- 0900 and 1700-1800 with 15mins intervals on Balmoral Avenue, and parts of Eden Park Avenue and Upper Elmers End Road.

Proposed Development

Existing Temporary School

Whilst the permanent site is being designed and constructed, it will be necessary for the School to be housed in temporary accommodation for a period of two years.

Proposals for a temporary school have been submitted for a period of two years at the Ravensbourne School Site and would accommodate 360 pupils. The existing Ravensbourne School is a secondary school with approximately 1400 pupils on site and 206 members of staff. The temporary school is planned to open in 2017.

The opening hours for the school are envisaged as follows:-
 Secondary school (operating hours) 0830 to 17.30
 Secondary school (opening hours) 0630 to 20.00 hours

Given the school hours the peak times of vehicular activity for the school are considered to be fall within the periods 0745 to 0845 and 1700 to 1800. These are based on 30 mins each side of 0815 when pupils are recommended to be on site for registration at 0830 in the morning and 30 mins each side of 1730 when pupils finish the extended school day.

The number of pupils would gradually increase to reach the full school roll and a phasing schedule is shown below:-

Year	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
	TEM P	TEM P	TEM P	Sch Ope ns						
Yr. 7	0	180	180	240	240	240	240	240	240	240
Yr 8			180	180	240	240	240	240	240	240
Yr 9				180	180	240	240	240	240	240
Yr 10					180	180	240	240	240	240
Yr 11							180	240	240	240
Yr 12							240	240	240	240
Yr 13								240	240	240
Total	0	180	360	600	840	1080	1380	1680	1680	1680

The surplus places in the 6th form year groups in 2022 – 24 would be offered externally as the 2 year groups who started in the temporary accommodation roll forward.

The number of staff would also gradually increase and a phasing schedule is shown below

Staff	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
SLT		1.5	1.7	2	3	4	7			
Teaching		8	15	26	36	47	52	57	57	57

<i>Pupil support</i>		7	12	16	19	21	21	21	21	21
<i>Admin</i>		4.1	6.1	10.1	13.4	15.5	15.5	15.5	15.5	15.5
<i>Premises</i>		1	1.5	2.3	2.8	4	4	4	4	4
<i>Catering</i>		2	2.5	2.5	3.9	44	4.4	4.4	4.4	44
<i>Other</i>		2	2	5	5	7	7	10	10	1
Total		26	41	64	83	103	111	120	120	120

No parking or arrangements for pupil pick-up and drop-off are envisaged on site with the exception for pupils with disabilities or other mobility impairment. There will be 105 parking spaces (inclusive of 6 disabled spaces) for staff and visitors plus 4 spaces for mini-buses served from the vehicular access to the school with an area for coach / pupil drop-off and pick-up off Balmoral Avenue.

Where Pupils Live, Pupils Postcode Data

A summary of the distance pupils might live from the proposed school is provided in the table below:-

Post Code	<i>0 to 800m</i>	<i>800 to 1km</i>	<i>1k to 1.6k m</i>	<i>1.6km to 2.0km</i>	<i>2.0km to 3.2km</i>	<i>3.2k m to 4.8k m</i>	<i>Over 4.8k m</i>	
BR	26	7	24	16	31	19	11	
SE	0	0	0	10	45	24	11	
CR	2	5	0	1	6	0	0	
Total	28	12	24	27	82	43	22	238
Percentage	11.8 %	5.0 %	10.1 %	11.3 %	34.5 %	18.1 %	9.2 %	100 %
Cumulative %	11.8 %	16.8 %	26.9 %	38.2 %	72.7 %	90.8 %	100 %	

The overall proportion of pupils in the BR postcode is 56%, SE postcode is 38% and CR postcode is 6%. Reference to drawing 9201-001 shows the main focus of where pupils live, this being to the West and North West of the proposed school.

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Existing School Travel Plans

Mode split data from school travel plans in Bromley and Croydon have been

obtained for the following three secondary schools:-
 Langley Park School - Girls school (Bromley)
 Langley Park School - Boys school (Bromley)
 Shirley High School (Croydon)

The average Pupil and Staff data is summarised below.

	Car	Car Share	Park & Stride	Rail	Tram	Bus	School Bus	Cycle	Scoot	Walk	Total
Langley Park School for Boys	216	23	58	64	43	383		18		843	1684
Shirley High School	127	0	0	0	91	518		5	0	237	978
Langley Park School for Girls	81	46	124	35	5	232	1	4	0	325	853
Total	520	92	215	138	139	1664	1	34	4	1554	4359
Proportion	12.2%	2%	5.2%	2.8%	4%	32.4%	0%	0.8%	0%	40.4%	100%

Based on the above average multi modal percentages, potential Multi Modal generations for the proposed 1,680 pupils is shown in the table below:

	Car	Car Share	Park & Stride	Rail	Tram	Bus	School Bus	Cycle	Scoot	Walk	Total
Proportion	12.2%	2%	5.2%	2.8%	4%	32.6%	0%	0.8%	0%	40.4%	100%
1680 Pupils	205	33	88	48	91	518	0	13	0	678	1680

As indicated from the table above 80.6% travel by non-car modes, which excludes car share and park and stride. Car sharing is 2% and park and stride is at 5.2% and car is 12.2%.

Staff Travel

	Car	Car Share	Park & Stride	Rail	Tram	Bus	School Bus	Cycle	Scoot	Walk	Total
Langley Park School for Boys	152	2	0	6	0	9	0	7	0	12	188
Shirley High School	119	4	0	0	0	10	0	3	0	9	145
Total	271	6	0	6	0	19	0	10	0	21	333
Proportion	81.4%	1.8%	0%	1.8%	0%	5.7%	0%	3.0%	0%	6.3%	100%

Based on the above average multi modal percentages, potential Multi Modal generations for the proposed 120 staff is shown in the tables below:

	Car	Car Share	Park & Stride	Rail	Tram	Bus	School Bus	Cycle	Scoot	Walk	Total
Proportion	81.4%	1.8%	0%	1.8%	0%	5.7%	0%	3%	0%	6.3%	100%
120 Staff	98	2	0	2	0	7	0	3	0	8	120

The table above indicates 16.8% travel by non-car modes, which excludes car share and park and stride. Car sharing is 1.8% and park and stride is at 0%.

2011 School Census Information

Mode split data for 5 schools in Bromley and Croydon has been obtained from the 2011 School Census website for the following secondary schools:-
Langley Park School - Boys and Girls school (Bromley)

The Hayes School (Bromley)
 Ravensbourne School
 Shirley High School
 Oasis Academy, Shirley Park (Croydon)

Based on the average multi modal percentages, potential Multi Modal generations for the proposed 1680 pupils is shown in the table below:

	Walk	Cycle	Car	Bus	Train	other	Total
<i>Proportion</i>	81.4%	1.8%	0%	1.8%	0%	3.0%	100%
<i>1680 Pupils</i>	760	20	191	610	39	60	1680

89% travel by non-car modes. On average 11% travel by car to the school based on the schools detailed above.

The Ravensbourne School Travel Surveys.

A pupil and staff 'Hands Up' travel survey has been undertaken in October 2015 of the pupils at The Ravensbourne school, a second pupil 'Hands Up' travel survey has been undertaken in March 2016.

Also pupil and staff 'Hands Up' travel survey was undertaken in October 2015 of the pupils at the Ravensbourne school. It should be noted that the school comprises of approximately 1400 pupils and 206 members of staff. The survey comprised of 100% respondents and the modal split and potential Multi Modal generation for the proposed 1680 pupils.

Pupil Hands up survey Oct 2015 indicates that 87% travel by non-car modes, which excludes car share and park and stride. Car sharing is 1% and park and stride is at 6%.

The staff survey reveals 14% travel by non-car modes, which excludes car share and park and stride. Car sharing is 4% and park and stride is at 39%.

March 2016 Survey (Ravensbourne Hands Up Survey)

A pupil 'Hands Up' travel survey has been undertaken in March 2016 of the pupils at the Ravensbourne school accommodation. The school comprises of approximately 1400 pupils. The survey comprised of 88% respondents and the modal split and potential Multi Modal generations using this data for the proposed 1680 pupils.

84% travel to school by non-car modes, which excludes car share and park and stride. Car sharing is 5% and park and stride is at 2%. 87% travel from school by non-car modes, which excludes car share and park and stride. Car sharing is 4% and park and stride is at 2%.

Pupil Traffic Generations

For assessment purposes this Transport Assessment has used information recorded in the Ravensbourne School Hands Up Survey (March 2016) to assess the likely level of vehicle trips to/from the proposed school. A summary of the proposed and likely levels of pupils travelling to school in a vehicle is indicated below:

Pupil Travel to/from School	Car
Travel Proportions To School	16%
Pupils traveling to School in a Car	269
Travel Proportions From School	13%
Pupils traveling From School in a Car	218

Up to 269 Pupils could travel to school in a car and up to 218 pupils could travel from the school in a car. It should be noted that no allowance is made in this table for siblings or friends travelling together in a vehicle or car sharing.

A summary of the split of pupils is identified below:

Mode of Travel to School	1680 Pupils	
	Mode Share (%)	Trip Generation
Car	9%	154
Car Share	5%	76
Park and Stride	2%	35

Pupil Hands up survey (Travel to School by Car)

Mode of Travel to School	1680 Pupils	
	Mode Share (%)	Trip Generation
Car	7%	118
Car Share	4%	75
Park and Stride	2%	26

Pupil Hands up survey (Travel From School by Car)

The level of car sharing has been identified as 5% (76 pupils) travelling to school and 4% (75 pupils) travelling from school. For assessment purposes it has been assumed that there are 2 pupils per vehicle for Car Sharing. On this basis there would be one vehicular trip per two pupils. It is considered that the pupils who are identified as park and stride would not travel by car along Balmoral Avenue and the closest to the site they would be dropped-off and picked-up is along either Uppers Elmers End Road or Eden Park Avenue. It is further assumed for this analysis that a pupil car trip produces an arrival and departure trip.

Up to 454 vehicles (two way) could be generated in the AM Peak and 364 vehicles (two way) could be generated in the PM Peak for pupils travelling to and from the site. Given the school hours the peak times of vehicular activity for the school are considered to be fall within the periods 0745 to 0845 and 1700 to 1800. These are based on 30 mins each side of 0815 when pupils are recommended to be on site for registration at 0830 in the morning and 30 mins each side of 1730 when pupils finish the extended school day.

Staff Traffic Generations

For assessment purposes this Transport Assessment has used information recorded in the Ravensbourne (October 2015) travel survey to assess the likely level of vehicle trips to the proposed school for Staff. A summary of the proposed and likely levels of staff travelling to school in a vehicle is indicated below.

School name	Car
October 2015 (Ravensbourne Survey)	86%
Vehicle Generations Staff Travel	103

Up to 103 staff could travel to and from school in a car. A summary of the AM and PM peak arrivals and departures are indicated below.

	Arrivals	Departures	Total
AM Peak	103	0	103
PM Peak	0	103	103

As indicated from the tables up to 103 vehicles (two-way) could be generated in the AM Peak and 103 vehicles (two-way) could be generated in the PM Peak for staff travelling to and from the site. It is considered that staff would arrive about 30 mins before pupils and leave about 30 mins after pupils and staff trips would not be in the same time periods as pupils.

Traffic Distribution

The table below shows the percentage traffic assignments from the site to the main highway routes in the area of the school site:

Direction	Route	Distribution %
North and North West	Balmoral Ave / Eden Park Avenue / A22 Croydon Road	39.7%
East	Balmoral Avenue / Eden Park Avenue (East Bound)	26.1%
South and South East	Balmoral Ave / Upper Elmers End Road (South Bound)	20.2%
West	Balmoral Avenue / Upper Elmers End Road (North Bound)	14.1%
		100%

For pupils getting dropped off at the school gates the report assumes vehicles would depart in the same direction of their arrival. Pupils who are identified as

park and stride in section 7 would not travel by car along Balmoral Avenue and the closest to the site they would be dropped-off and picked-up is along either Uppers Elmers End Road or Eden Park Avenue. The traffic assignment for park and stride pupils assumes that a vehicle dropping of the pupil would carry on their journey rather than returning to their origin.

Distribution of staff travel has been based on an equal split staff travelling to the North, South, East and West. The table below shows the percentage traffic assignments from the site to the main routes in the area of the site

<i>Direction</i>	<i>Route</i>	<i>Distribution %</i>
<i>North</i>	<i>Balmoral Ave / Eden Park Avenue / A22 Croydon Road</i>	<i>25%</i>
<i>East</i>	<i>Balmoral Avenue / Eden Park Avenue (East Bound)</i>	<i>25%</i>
<i>South</i>	<i>Balmoral Ave / Upper Elmers End Road (South Bound)</i>	<i>25%</i>
<i>West</i>	<i>Balmoral Avenue / Upper Elmers End Road (North Bound)</i>	<i>25%</i>
		<i>100%</i>

Traffic Modelling

Transport Feasibility Assessment four junctions have been analysed as part of the Transport Assessment. These junctions are listed below:-

*Balmoral Avenue / Upper Elmers End Road (A214) (Priority Junction)
 Balmoral Avenue / Eden Park Avenue (Priority Junction)
 Dunbar Avenue / Eden Park Avenue (Priority Junction)
 Eden Park Avenue / A222 Croydon Road (Priority Junction)*

The computer program, PICADY 5, has been used to model these four junctions in order to assess the capacity, queuing and delay experienced at the accesses.

The OD Tab method of inputting traffic flows has been used in this analysis.

Ratio of Flow to Capacity value (RFC) exceeding 0.850 suggests that an arm of a junction is operating within capacity however delays and queuing are likely to be experienced. An RFC value exceeding 1.000 suggests that an arm of a junction is operating beyond its theoretical capacity and significant queuing and delay will be experienced.

Balmoral Avenue / Upper Elmers End Road (A214)

The results indicate that there is no adverse queuing or capacity problems at the priority junction given that the ratio of flow to capacity (RFC) is below 0.85. therefore sufficient spare capacity is available within this junction

Balmoral Avenue / Eden Park Avenue

Similarly there is no adverse queuing or capacity problems at the priority junction given that the ratio of flow to capacity (RFC) is well below 0.85. Sufficient capacity is available within this junction.

Dunbar Avenue / Eden Park Avenue

Again there is no adverse queuing or capacity problems at the priority junction given that the ratio of flow to capacity (RFC) is well below 0.85. Sufficient spare capacity is available within this junction

Eden Park Avenue / A222 Croydon Road

Finally no adverse queuing or capacity problems in the PM Peak period given that the ratio of flow to capacity (RFC) is below 0.85. However in the AM peak Eden Park Avenue is shown to be operating over capacity 0.906 in the 2016 base scenario and an increased RFC of 1.111 in the 2016 Base plus development traffic scenario.

Given the results for the AM assessment period further capacity analysis has been undertaken using the direct method of inputting traffic flow data and excluding staff traffic movements as it is considered that they will arrive before pupils and then leave after them. The tables below show the 2016 base situation together with the 2016 base plus development

Time Period	Movement	2016 Base AM	
		RFC	Queue
07:45-08:00	B-C	0.638	1.66
	B-A	0.094	0.1
	C-AB	0.717	2.46
08:00-08:15	B-C	0.657	1.83
	B-A	0.052	0.06
	C-AB	0.734	2.76
08:15-08:30	B-C	0.902	5.97
	B-A	0.225	0.28
	C-AB	0.666	2.17
08:30-08:45	B-C	0.767	3.69
	B-A	0.143	0.17
	C-AB	0.470	0.91

Table above 2016 Base

Time Period	Movement	2016 Base + Dev AM	
		RFC	Queue
07:45-08:00	B-C	0.807	3.5
	B-A	0.097	0.11
	C-AB	0.739	2.75
08:00-08:15	B-C	0.831	4.29

	B-A	0.053	0.06
	C-AB	0.759	3.15
08:15-08:30	B-C	1.077	18.04
	B-A	0.231	0.29
	C-AB	0.687	2.43
08:30-08:45	B-C	0.942	17.95
	B-A	0.147	0.18
	C-AB	0.485	0.97

Table above 2016 Base plus Development (pupils)

From the above table for the 2016 base scenario, it can be seen that only one RFC value is greater than 0.85 at 0.902 with a predicted queue of 5.97veh on the left turn out of Eden Park Avenue which is not considered unreasonable in the network peak period. It can be seen that the RFC values on the other movements are predicted at below 0.85. When development traffic is added the Eden Park Avenue left turn RFC increases from 0.902 to 1.077 and from 0.767 to 0.942 in the 08:15-08:30 and 08:30-08:45 15 minute interval periods respectively with corresponding queues of 18.04 and 17.95. There is no predicted direct increase to the left turn out traffic flow from the development. Whilst the predicted queue lengths increase. In this situation there is an alternative route which is to leave Balmoral Avenue via Upper Elmers End Road and then join Croydon Road which would assist in dispersing traffic. This junction does have reserve operational capacity.

A sensitivity test was requested by this office to understand the effect of some staff arriving with pupils is considered. In the foregoing capacity assessment it was assumed that staff would arrive 30 min before pupils in the period up to 0745. For this sensitivity test it is assumed that half of the staff would arrive between 0745 and 0815 indicating that 26 staff turn left into Eden Park Avenue in the AM peak with no departures and no staff arrives in the PM peak but with 25 departures in the PM peak. For this model scenario it is assumed that 14 staff vehicles turn left into Eden Park Avenue in addition to the pupil traffic movements in the AM peak. The initial capacity assessment in the PM peak allowed for all staff leaving in the same time period as pupils and shows that the RFC ratios are below 0.85.

The school is intended to adopt target modal splits which reduces the number of pupils travelling to school by car from 16% (March 2016 data) used for assessment purposes to 6.1% (May 2016 data) travelling to school by car which relates to the AM peak period. Overall the number of car trips using Balmoral Road would reduce from 192 arrivals and departures to 71 arrivals and departures. The number of park and stride car trips would reduce from 35 arrivals and departures to 18 arrivals and departures. With regard to the Croydon Road and Eden Park Avenue junction this has been re-assessed using the target pupil car trips. The results of the PICADY model for the 2016 base plus development (pupils only) is shown in the table below.

Time Period	Movement	2016 Base + Target Dev AM	
		RFC	Queue

07:45-08:00	B-C	0.663	1.84
	B-A	0.226	0.28
	C-AB	0.725	2.56
08:00-08:15	B-C	0.686	2.06
	B-A	0.196	0.25
	C-AB	0.744	2.9
08:15-08:30	B-C	0.938	7.37
	B-A	0.352	0.52
	C-AB	0.687	2.26
08:30-08:45	B-C	0.796	4.50
	B-A	0.264	0.37
	C-AB	0.476	0.93

Table above Base plus Target Development (pupils)

From the above table for the 2016 base plus target development scenario, it can be seen that only one RFC value is greater than 0.85 at 0.938 with a predicted queue of 7.37 vehicles in the 08:15-08:30, 15 minute interval on the left turn out of Eden Park Avenue which is not considered unreasonable in the network peak period and also that under the observed traffic flows the RFC is 0.902 for the same time period with a queue of 5.97. It can be seen that the RFC values on the other movements are predicted at below 0.85 so are within the practical capacity.

Summary

Whilst the permanent site is being designed and constructed, it will be necessary for the school to be housed in temporary accommodation for a period of two years.

Proposals for a temporary school have been submitted to the Local Planning Authority (LBB) for a period of two years at the Ravensbourne School 10.4 Eden Park High School is a proposed secondary school, which will provide 1,680 places for pupils aged 11-18. This comprises an 8 form-entry (8FE) secondary school (1,200 pupils) and 480 place sixth form. The permanent site for the new School is, off Balmoral Avenue, Beckenham, which is planned to open in 2019.

Pupil 'Hands Up' travel surveys was undertaken of the pupils at the Ravensbourne school accommodation. It should be noted that school comprises of approximately 1,400 pupils. Separate surveys have been undertaken for pupils travelling to school and pupils returning from school. For assessment purposes the submitted Transport Assessment used information recorded in the Ravensbourne Hands Up Survey (March 2016) to assess the level of Multi Modal and vehicle trips to the proposed school. The results show 84% (1,411 Pupils) travel to school by non-car modes and 87% (1,462 Pupils) travel from school by non-car modes. A further Hands Up Survey (May 2016) has been used to assess the target level of Multi Modal and vehicle trips to the proposed school.

The Ravensbourne Survey (October 2015) has been used to assess the likely level of staff Multi Modal and vehicle trips to the proposed school. The results

show 14% (17 staff) travel to school by non-car modes and 86% (103 staff) travel from school by car.

Vehicular access is proposed from Balmoral Avenue with 103 parking spaces provided for staff and visitors together with facilities for drop-off / pick-up within the site adjacent to Balmoral Avenue.

The traffic generation assessment considered the level of secondary school vehicular trips. Based on the Ravensbourne School 'Hands Up' (March 2016) survey up to 454 vehicles (two way) could be generated in the AM Peak and 364 vehicles (two way) could be generated in the PM Peak for pupils travelling to and from the site. Based on the Ravensbourne school October 2015 survey up to 103 (two way) car trips could be generated in the AM Peak and 103 trips (two way) could be generated in the PM Peak for staff travelling to and from the site.

The capacity assessments showed that the priority junctions of Balmoral Avenue/ Upper Elmers End Road (A214), Balmoral Avenue / Eden Park Avenue and Dunbar Avenue / Eden Park Avenue will operate within capacity for all modelled scenarios.

However, the junction of Eden Park Avenue / A222 Croydon Road is predicted to operate over capacity (0.906 RFC) on the Eden Park Avenue arm in the 2016 base traffic situation for the AM modelled period although it operates satisfactorily below 0.85 RFC in the PM period. When development traffic is added to the 2016 base scenario the RFC increases to 1.111. Further operational analysis of the junction operation shows that this would be a worst case and using the direct method of traffic flow data input the RFC is predicted to be 1.077 with a corresponding queue of 18 rather than 35.

As mentioned previously the school is intended to adopt target modal splits which reduces the number of pupils travelling to school by car from 16% (March 2016 data) used for assessment purposes to 6.1% (May 2016 data) travelling to school by car which relates to the AM peak period. In this situation the overall the number of car trips using Balmoral Road would reduce from 192 arrivals and departures to 71 arrivals and departures. The number of park and stride car trips would reduce from 35 arrivals and departures to 18 arrivals and departures in the AM peak.

With regard to the Croydon Road and Eden Park Avenue junction this has been re-assessed using the target pupil car trips. From this analysis, using the direct method of input and the 2016 base plus target development traffic flow scenario, it can be seen that only one RFC value is greater than 0.85 at 0.938 with a predicted queue of 7.37veh in the 08:15-08:30, 15 minute time interval. In comparison the RFC without development is 0.902 with a queue of 5.97veh. It should be noted that the number of pupils will increase gradually from 600 in 2019 when the school is predicted to open to 1680 in 2023. The School therefore has time to implement the Travel Plan and proposed measures to encourage travel by sustainable modes. In this case there is predicted to be no direct increase to the left turn out traffic flow from the development. In this situation there is an alternative route which is to leave

Balmoral Avenue via Upper Elmers End Road and then join Croydon Road which would assist in dispersing traffic. This junction shown to have reserve operational capacity.

The application will have an impact on surrounding road network and on the parking demand within the vicinity of the school site. 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.

In terms of planning obligations, the school will need to commit to fund (£20,000) a future traffic management scheme should the Council wish to do so, supported by ongoing monitoring of parking capacity issue beyond 2020/21. Also any works in order to modify the existing Traffic Regulation Order or introduce a new (waiting restrictions) within the vicinity must be funded by the applicant.

If minded to approve, please include the following with any permission:

CONDITION

H01 (Access- all the safety audit recommendations must be adhered to)

H03 (Car Parking)

H16 (Hardstanding for wash-down facilities)

H22 (Cycle parking)

H28 (Car park Management)

H29 (Construction Management Plan)

H30 (Travel Plan)

H32 (Highway Drainage)

INFORMATIVE

DI16 (Crossover)

*Non-standard informative – Street furniture/ Statutory Undertaker's apparatus
"Any repositioning, alteration and/ or adjustment to street furniture or Statutory Undertaker's apparatus, considered necessary and practical to help with the forming/ modification of vehicular crossover hereby permitted, shall be undertaken at the cost of the applicant"*

Further submissions from the applicant to address concerns raised by Transport for London (TfL) have been received and the Highways Officer provides further comments as follows:

"Impact on the Strategic Road Network

The applicant has redesigned the access creating one-way entry and exit system with the exit on to Balmoral Avenue laid out so that vehicles should turn left on to Balmoral Avenue. Because of the one-way circulation, the exit must be suitable for larger vehicles; this is acceptable as it reduces the conflict at the access points.

*Additionally a Car Park Management Plan (CPMP) was requested
The CPMP is envisaged to outline the following:*

- *Operating times of the school and facilities available for community use.*
- *Management arrangements at the beginning and end of the school day for pupil drop-off and pick-up. The layout envisages a barrier to control access to the rear car park during the school day.*
- *Management arrangements at the beginning and end of the school day for staff parking.*
- *Management arrangements at the end of the school day on weekdays and at weekends for the community use of school facilities.*

Cycle Parking

A further 17 short-stay cycle parking spaces be provided in addition to the 225 long stay spaces, which is satisfactory.

Travel Plan

The School Travel Plan working towards STARS accreditation and requested the introduction of target dates to achieve bronze (by the of the first academic year) and silver accreditation (two years after that).

Strategic Issues

With regard to pupil travel by car it should be noted that pupils would need to attend a school, even if Eden Park High School was not available and therefore it could be argued that in a broad sense travel by car would occur on the wider network to access these schools.

The Council's policy on off-street parking in development is set out in Policy T3 of the Unitary Development Plan. Appendix II – Parking Standards provides the maximum level of parking that could be provided in development for various types of use. No particular ratio is stated for class D1 Schools / Further Education, indicating that the level of parking should be assessed through the Transport Assessment.

In this case a parking survey has been undertaken and there are no restrictions to parking on Balmoral Avenue. However, Balmoral Avenue is a residential street with many properties having off-street parking. Parking outside schools is an emotive subject for residents and can lead to inconvenience, complaints and safety concerns. For this reason, parking for staff is provided on site as well some provision for pupil drop-off and pick-up.

The School proposals are supported by a School Travel Plan and targets have been set which are considered realistic by TfL. Nevertheless, some pupils will travel by car and therefore some provision is proposed at the beginning and end of the school day, in an effort to mitigate the potential concerns of residents living local to the school. It is considered that reducing the proposed level of parking would lead to increased concern from residents. With regard to the operational capacity concerns of the Croydon Road junction, reducing car parking for staff would not assist, since there are no staff departures in the AM peak period.

Furthermore, pupils starting year seven would have been attending primary school and would transfer to a secondary school, such as Eden Park High School and in this situation, those pupils travelling by car would again already be on the highway network. Those pupils leaving school after 6th form would no longer have the school as a travel destination.

The target modal splits are indicated in section 6 of the Transport Assessment which reduces the number of pupils travelling to school by car from 16% (March 2016 data) to 6.1% (May 2016 data) in the AM peak period. Overall the number of car trips using Balmoral Avenue would reduce from 192 arrivals and departures, to 71 arrivals and departures. The number of park and stride car trips would reduce from 35 arrivals and departures to 18 arrivals and departures.

With regard to the Croydon Road and Eden Park Avenue junction this has been re-assessed using the target pupil car trips. The results of the PICADY model for the 2016 base plus development (pupils only) is shown that only one RFC value is greater than 0.85 at 0.938 with a predicted queue of 7.37 vehicles in the 08:15-08:30 interval on the left turn out of Eden Park Avenue which is not considered unreasonable in the network peak period. Also for comparison under the observed base traffic flows the RFC is 0.902 for the same time period with a queue of 5.97. It can be seen that the RFC values on the other movements are predicted at below 0.85 so are within the practical capacity of the junction. In this situation queuing and delay at the junction occurs to the traffic on the side street and not on Croydon Road which is the priority route at the junction.

Furthermore the revised exit arrangement reduces predicted pupil car departure trips to the north by 47 of which 28 turned right towards Croydon Road in the AM peak period. In this time period, there are no departing staff trips so reducing staff car parking would not have any effect. The car trips categorised as park and stride would be unaffected since they do not travel along Balmoral Avenue.

The operational capacity of the Croydon Road junction has been tested under this scenario for the 2016 base plus target development scenario with a left turn exit, it can be seen that only one RFC value is greater than 0.85 at 0.911 with a predicted queue of 6.29 vehicles in the 08:15-08:30 time interval on the left turn out of Eden Park Avenue. This is not considered unreasonable in the network peak period. The RFC values on the other movements are predicted at below 0.85.

For comparison under the observed base traffic flows the RFC is 0.902 for the 08:15-08:30 time interval with a queue of 5.97 together with a RFC of 0.938 and queue of 7.37 if traffic can turn right out. Therefore, there is some benefit in providing an exit arrangement where traffic turns left out.

The operational capacity of the Balmoral Avenue / Upper Elmers End Road (A214) junction has been tested given the additional departing traffic and the results are summarised in the table below with a copy of the output attached: -

	AM Peak 07:45–08:45		Inter Peak 17:00– 18:00	
	Max RFC	Max Queue	Max RFC	Max Queue
B-C	0.290	0.41	0.353	0.54
B-A	0.215	0.27	0.326	0.48
C-A	0.662	3.12	0.199	0.47

From the above table, it can be seen that there are no adverse queuing or capacity problems at the priority junction given that the ratio of flow to capacity (RFC) is below 0.85. Spare capacity is available within this junction under this traffic scenario.

The Highways Officer has confirmed that the proposed changes to the exit access to provide left turn only from the site into Balmoral Avenue has overcome concerns relating to the impact on the capacity at the junction of Eden Park Avenue and Croydon Road.

In addition the Highways Officer advises that the impact of the proposed community use of the MUGA and sports hall is acceptable in terms of the impact on the highway network and can be accommodated on the site and on local streets.

Transport for London (TfL)

The initial comments from TfL are as follows:

Impact on Buses

TfL has considered the additional information provided by the applicant with respect to the proposed schools catchment area and confirms that the additional trips envisaged as a result of the proposed development can be accommodated on the network.

Notwithstanding this, the school should encourage active travel including trips made to/from public transport. For example, pupils should be encouraged to walk to alternative bus stops offering a greater choice of bus services to help to spread the demand. TfL requests that the school reconsider any options to stagger the arrival and departure times of pupils to aid the dispersal of demand for bus travel.

Impact on the Strategic Road Network

Given the expected number of vehicle trips and the likely distribution of traffic on the network TfL considers the impact of the proposed development on the Strategic Road Network (SRN) to be unacceptable in line with London Plan policy 6.3. The junction between Eden Park Road and the A222 Croydon Road is likely to operate over capacity in all development scenarios.

In the Stage 1 report TfL requested that the number of staff parking spaces and the availability of pupil drop-off/pick-up on site should be significantly reduced, as this would encourage car travel. TfL strongly advises the applicant to consider this approach to discourage car travel in favour of sustainable travel modes and to reduce the impact of traffic on the SRN.

To alleviate the impact of the proposed development on the junction between Eden Park Avenue and Croydon Road, the applicant should consider the implementation of a one-way entry and exit system with a right-turn ban on the exit on to Balmoral Avenue. This would have the effect of preventing vehicles from routing north bound on Balmoral Avenue from the site to disperse the traffic on the wider network, via Balmoral Avenue and Upper Elmers End Road which is less congested. The junction geometry should be designed as such to physically deter right-turn manoeuvres from the site. This should be accompanied by swept path analysis to consider the movement of all vehicles including larger vehicles (such as coaches and refuse). The proposed junction would need to be agreed with Bromley Council and delivered through a section 278 (s278) agreement.

A Car Park Management Plan (CPMP) should be prepared to set out the proposed management of pupil drop-off/pick-up. The CPMP should set out the proposed one-way routing arrangements through the site and the school should implement mechanisms to monitor appropriate use of this facility. This should be secured by a condition.

Cycle Parking

The school is proposed to accommodate a total of 1,680 pupils supported by around 120 staff. The proposals provide a total of 225 cycle parking spaces which does not comply with London Plan standards. The current London Plan standards require a minimum of 1 space per 8 staff plus 1 space per 8 students for long-stay cycle parking spaces, plus 1 space per 100 students to provide short-stay cycle parking spaces. Therefore a total of 225 long-stay plus 17 short-stay cycle parking spaces should be provided as a minimum.

Travel Plan

TfL welcomes the commitment to support a school travel plan with the school to work towards achieving a STARS accreditation. The school should stipulate within the Travel Plan the target date for when the bronze accreditation will be achieved by. Typically the school should aim for at least bronze accreditation by the end of their first academic year, followed by a silver accreditation two years prior to that.

It is understood that the proposed school is allied with the Ravensbourne School which has a gold STARS accreditation. It is proposed that the Head teacher of the temporary school site which is located at the Ravensbourne School will act as the interim Travel Plan Coordinator; however this role will need to be covered by a member of staff at the proposed school to enable implementation of the travel plan going forward.

The school should be aware that as part of the STARS programme they will be required to complete a pupil hands up travel survey on an annual basis which can be recorded through the STARS system. TfL confirms that the travel plan targets are realistic and should be reviewed once the school is in operation.”

Following submissions by the applicant to overcome TfL concerns a further comment from TfL has been received as follows:

“Subsequent to the additional information submitted by the applicant on 22nd December 2016 (by email), including the Transport Addendum (9201/DJC/004) and revised Masterplan, TfL confirms that the proposals address previous concerns that were raised within the Stage 1 report and letter dated 9th December 2016. TfL provides the following comments:

- TfL welcomes the consideration of staggered arrival and departure times, the provision of Electric Vehicle Charging Points (EVCPs) and the additional 17 cycle parking spaces which is compliant with the London Plan standards.*
- It was strongly advised by TfL that the applicant should reduce the number of parking spaces proposed and it is disappointing that this has not been considered. The demand and use of the parking should be monitored via a robust Car Park Management Plan (CPMP). The submission of the CPMP should be secured by condition.*
- As requested, the proposed access arrangements have been amended to provide a one-way route, with left-turn only restriction on the egress to Balmoral Avenue, to alleviate the impact on the junction between Eden Park Avenue and Croydon Road. This will be subject to a detailed design process, including a Road Safety Audit, to be approved by the Council and should include adequate signage to enforce the banned right-turn manoeuvres.*
- TfL support the Travel Plan objectives and commitment of the school to work towards targets to achieve STARS accreditation. The Travel Plan targets must be monitored appropriately and stringent measures implemented to encourage the use of non-car transport modes, specifically increasing the level of active travel amongst pupils and staff.*

Subject to the above conditions being met, the proposed development as it stands would have no significant detrimental impact on the Strategic Road Network (SRN).

TfL has confirmed that the proposed changes to provide a left turn only from the site into Balmoral Avenue has overcome concerns relating to the impact on the capacity at the junction of Eden Park Avenue and Croydon Road.”

Greater London Authority (GLA)

The Greater London Authority (GLA) is a statutory consultee for this application. A Stage 1 letter was received from the GLA which provided detailed comments and the conclusion raised the following concerns:

“London Plan policies on principle of land use: provision of school on open space/ playing fields, community use, urban design, inclusive access, sustainable development/energy and flood risk management and transport are the key strategic issues relevant to this planning application. On balance, the

application does not comply with the London Plan. The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- *Land use - educational facilities on open space/playing fields: Robust justification on educational need, and an alternative site search, including co-location options, is required in order to justify development on existing designated open space and playing fields. This should also address the concerns expressed previously to the Council regarding its proposed site designation.*
- *Playing fields and community use: A community use plan, which makes available the new sport facilities in the school for community use outside the school's core hours, should be secured. As the site is a designated open space/playing field, results of negotiations with Sport England should be shared with the GLA.*
- *Urban design: The Council should secure key details of the cladding system and materials to ensure the best possible build quality is delivered and ease of maintenance is prioritised.*
- *Access: To ensure the application accords with London Plan Policy 7.2, the Council should secure a full access strategy with condition for the detailed design phase.*
- *Sustainable development - energy and flood risk management: the carbon dioxide emission savings exceed the target set within Policy 5.2 of the London Plan. However, the concerns in regard to heating and cooling strategy, provision of the BRUKL sheets including efficiency measures alone to support the savings claimed, future proofing and a single heating system, the total PV output in kWp, roof plan and the assumed efficiency of the panels should be clarified and addressed before compliance with London Plan energy policies can be verified. The Council should also secure the submission of a detailed sustainable drainage strategy meeting the requirements of London Plan policy 5:13.*
- *Transport: A significant reduction in staff car parking and a reduction in the availability for on-site pupil drop-off are required to discourage car use and relieve the traffic issues on the strategic highway network. Issues in regard to bus capacity and school travel plan also need to be resolved in discussion with TfL in order to meet London Plan transport policies.”*

The issues raised by the GLA will be addressed in the Conclusion section of this report. Should members be minded to grant permission for the application, the case will be referred back to the GLA for Stage 2 for further consideration.

Drainage

The Council's Drainage Officer states the following:

“Reviewing the submitted “Initial Surface Water Drainage Strategy Report” with reference number. FS0391-MAC-XX-XX-SP-P-003 Dated 05/12/2016, Microdrainage calculations dated 30/11/2016 and “Underground Drainage Layout” Plan DRW No. MAC-XXXX-DR-P-003 Dated 15/06/2016, I note the applicant is proposing to incorporate green roofs, permeable paving and a total attenuation tank of 1888m³ to restrict run-off rate discharge to 5.1l/s for all events including the 1 in 100 plus 30% are acceptable.

Condition: The development permitted by this planning permission 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.

Reason: To reduce the impact of flooding both to and from the proposed development and third parties.”

Environment Agency

Initially the Environment Agency (EA) raised the following objection to the development for the following reasons:

“The FRA submitted with this application does not comply with the requirements set out in paragraph 9 of the Technical Guide to the National Planning Policy Framework. The submitted FRA does not, therefore, provide a suitable basis assessment to be made of the flood risks arising from the proposed development. In particular, the submitted FRA fails to:

- Consider the range of flooding events including extreme events on people and property, using the most up-to-date site specific modelled flood levels.*
- Take the impacts of climate change into account.*

The majority of the site is situated within Flood Zone 1, with part of the site situated within Flood Zone 2 and 3. Under the National Planning Policy Framework (NPPF) the site is classified as ‘more vulnerable’ and would be considered acceptable under certain conditions.”

In order to address the concerns raised by the EA, the applicant has submitted a revised FRA for consideration. The EA now advise that the proposed development will only meet the requirements of the National Planning Policy Framework if the following measures as detailed in the Flood Risk Assessment submitted with this application are implemented and secured by way of a planning condition on any planning permission and recommend the following condition, together with further other advice:

“The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk Assessment (FRA) titled ‘Eden Park Secondary School, Balmoral Avenue,

Beckenham, Flood Risk Assessment, Version 2.0' dated 8 November 2016 and the following mitigation measures detailed within the FRA: Finished floor levels will be set no lower than 37.66mAOD or 150mm above the existing ground level, whichever is greater.

Reason: Finished floor levels situated 300mm above the 1 in 1000 year (0.1% AEP) flood level will reduce the risk of flooding to the proposed development and future occupants.

The worst-case scenario flood levels of 37.36m AOD for the 0.1% AEP have been used instead of 1% AEP plus climate change. The new allowances of climate change have been considered and the applicant has used the 0.1% AEP as the worst-case scenario. We have compared these flood levels with provisional model levels for the 1% AEP plus climate change with a 35% increase in flows and these are similar. We therefore deem the use of the 0.1% AEP flood levels to be acceptable at this site. The applicant has therefore proposed finished floor levels to be 300mm above the 0.1% AEP flood level at 37.66m AOD.

Other advice: We would recommend flood resilient measures to be incorporated within the development to minimise the impact of flooding to the development. We fully support the inclusion of flood resilience techniques. Information on flood resilience can be found on the following link http://www.planningportal.gov.uk/uploads/br/flood_performance.pdf.

We would also recommend that occupants register with the Environment Agency's flood warning service, 'FloodLine', so that they may prepare themselves in case of a flood event. This can be done by calling 0345 988 1188 to register.

We are pleased that the FRA considers safe dry access and egress. Please be aware that the Environment Agency does not normally comment on or approve the adequacy of flood emergency response procedures, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network. Any evacuation plan should provide suitable access and egress from the site and would need to be approved by the Local Planning Authorities (LPA's) Emergency Planning Department (EPD).

Please note that as a result of the Flood and Water Management Act 2010, the responsibility for surface water runoff, groundwater and ordinary watercourses now sits with the Lead Local Flood Authority (LLFA), London Borough of Bromley."

Thames Water

TW advise that with regard to sewerage infrastructure capacity, they would not have any objection to the above planning application.

“There will be approximately 3l/s additional foul flow into the receiving FW sewer network, the downstream sewers have capacity. Also, as this development is a school it will not discharge during the peak diurnal flows.

The proposed 5l/s peak surface water run-off equates to 2l/s/ha this is less than the current calculated SW run-off. Also, the FRA states that infiltration techniques will be investigated so there might not be any SW drainage connected to the local SW network depending on the results.

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. In respect of surface water it is recommended that 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.

Thames Water recommend that all petrol/oil interceptor be fitted to 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.

We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Should the local planning authority be minded to approve the application Thames Water would like the following informative attached to the planning permission: A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer.

Thames Water recommend the following informative: Thames Water aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9litres/minute at the point where it leaves Thames Water pipes. The developer shall take account of this minimum pressure aim the design of the proposed development.”

Environmental Health

“Contamination: A condition requiring the submission of a contaminated land assessment and associated remedial strategy is recommended.

Air Quality: I note the air quality assessment does not include for any potential impact from any proposed heating system. The matter could be dealt with by condition.

Construction activities will involve vehicles movements within the AQMA. To ensure that construction works do not have an adverse impact on the transport network in accordance with London Plan I would normally recommend a condition requiring the submission of a Construction Logistics Plan.

I note the air quality report predicts the impact from vehicle emissions fall within APEC Category A and therefore have no substantial objections in respect of air quality. However I would seek mitigation as appropriate and a Dust Management plan for any demolition works.”

Noise: The EHO concurs with all of the findings of the Report prepared by Cole Jarman Associates (Report 15/0467/R2 June 2016) in terms of the Noise Impact Assessment. The Report makes a number of recommendations particularly concerning acoustic barriers to the boundaries and these should be implemented in full through the imposition of relevant conditions. The following condition is recommended:

The Recommendations of the Cole Jarman report (Report 15/0467/R2 June 2016) regarding acoustic barriers shall be implemented in full prior to the use commencing and permanently maintained thereafter.”

Reason: “In the interest of protecting neighbouring residential amenity in line with Policy BE1 of the Unitary Development Plan.”

Lighting: With regard to the Lighting Assessment, the proposed low level bollard and bulkhead lights to illuminate the car parks and other areas are considered acceptable. With regard to floodlighting for the proposed MUGA and rugby pitch, it appears that the levels given in this report are no more than a guide and are levels which satisfy the various standards but are not derived from light distribution figures relevant to each luminaire. I would therefore recommend that a Condition be imposed requiring that a lighting scheme be approved by the LPA.”

Ecology:

The Council has appointed a specialist ecologist to assess the Extended Phase 1 Habitat Survey, a Bat Activity Survey and a second inspection of the site for badgers.

On the Habitat Survey concerns were initially raised about the credentials of the report authors, the ecological definition of grassland, the lack of bat surveys in 2016, the apparent lack of reptiles on the site, the need for a further walkover to check for badgers and nesting birds.

The applicant responded to the concerns satisfactorily, including advising that the site strip had already commenced before they were able to do their site survey visit, and the Council appointed ecologist raises no objections to the proposal on ecological grounds. A condition to offset the impact on biodiversity with associated landscaping to encourage biodiversity an

inclusion of bat and bird boxes within the design development is recommended.

Metropolitan Police Crime Prevention Design Adviser:

The Met Police CPDA advises that he believes that this development, should it proceed should be built to achieve security specifications required with the guidance of Secured by Design (New Schools 2014), and the adoption of these standards will help to reduce the opportunity for crime, creating a safer, more secure and sustainable environment.

Employing the standards and principles of Secured by Design will provide a sensible and practical level of security, which will not adversely affect the efficient running of the school, is essential to the successful teaching and learning environment.

The majority of criminal incidents in schools relate to property crime. This is because modern schools contain a vast array of portable and desirable goods with a ready market, such as personal computers, laptops, digital projectors and other valuable equipment.

Other crimes that occur, particularly in our larger cities, are acts of vandalism, such as graffiti, arson and assaults. Assaults range from staff being physically assaulted by parents and students, to bullying by one or more students against another. In more recent times 'cyber' bullying has become a noticeable problem in schools, although there are now software solutions that are proving to be most effective. The victims of school crime can also extend beyond the staff and students as many schools open into the evenings and at weekends for use by the local community for activities such as adult education, sport and social events.

Sport England

"It is understood that the site forms part of, or constitutes land last used as playing field as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595).

However, as the playing field has not been used for at least five years, the consultation with Sport England is not a statutory requirement.

Notwithstanding the non-statutory nature of the consultation, Sport England has considered the application in the light of the National Planning Policy Framework (particularly Para 74) and Sport England's policy on planning applications affecting playing fields 'A Sporting Future for the Playing Fields of England' (see link below): www.sportengland.org/playingfieldspolicy

Sport England is content to remove its objection as it is considered the proposed development broadly meets exception 5 of the above policy. The absence of an objection is subject to the following condition(s) being attached

to the decision notice should the local planning authority be minded to approve the application:

- *No development shall commence until a community use agreement prepared in consultation with Sport England has been submitted to and approved in writing by the Local Planning Authority, and a copy of the completed approved agreement has been provided to the Local Planning Authority. The agreement shall apply to the outdoor sports pitches; MUGA and sports hall and include details of pricing policy, hours of use, access by non-educational establishment users, management responsibilities and a mechanism for review. The development shall not be used at any time other than in strict compliance with the approved agreement.*

Reason: To secure well managed safe community access to the sports facility/facilities, to ensure sufficient benefit to the development of sport and to accord with Development Plan Policy.

Informative: Guidance on preparing Community Use Agreements is available from Sport England www.sportengland.org.

- *No development shall commence until the following documents have been submitted to and approved in writing by the Local Planning Authority after consultation with Sport England:*
 - (i) A detailed assessment of ground conditions (including drainage and topography) of the land proposed for the playing field which identifies constraints which could affect playing field quality; and*
 - (ii) Based on the results of the assessment to be carried out pursuant to (i) above, a detailed scheme which ensures that the playing field will be provided to an acceptable quality. The scheme shall include a written specification of soils structure, proposed drainage, cultivation and other operations associated with grass and sports turf establishment and a programme of implementation.*

(b) The approved scheme shall be carried out in full and in accordance with a timeframe agreed with the Local Planning Authority after consultation with Sport England. The land shall thereafter be maintained in accordance with the scheme and made available for playing field use in accordance with the scheme.

Reason: To ensure that the playing field is prepared to an adequate standard and is fit for purpose and to accord with Development Plan Policy.

- *The Sports Hall and MUGA hereby permitted shall not be constructed other than substantially in accordance with Sport England's Technical Design Guidance Notes: Artificial Surfaces for Outdoor Sport (Updated guidance for 2013) and Developing the Right Sports Hall*

Reason: To ensure the development is fit for purpose and sustainable and to accord with Development Plan Policy.

- *Informative: The applicant is advised that the scheme should comply with the relevant industry Technical Guidance, including guidance published by Sport England, National Governing Bodies for Sport. Particular attention is drawn to 'Natural Turf for Sport', (Sport England, 2011).*

Should conditions recommended above not be imposed on any planning consent, Sport England would consider the proposal to not meet exception 5 of our playing fields policy, and we would therefore object to this application."

Network Rail

"The developer/applicant must ensure that their proposal, both during construction and after completion of works on site, does not:

- *encroach onto Network Rail land*
- *affect the safety, operation or integrity of the company's railway and its infrastructure*
- *undermine its support zone*
- *damage the company's infrastructure*
- *place additional load on cuttings*
- *adversely affect any railway land or structure*
- *over-sail or encroach upon the air-space of any Network Rail land*
- *cause to obstruct or interfere with any works or proposed works or Network Rail development both now and in the future*

The developer should comply with the following comments and requirements for the safe operation of the railway and the protection of Network Rail's adjoining land. As this proposal is a school, our main concern is to prevent trespass onto the railway. As such please note suitable fencing should be erected and discussed with Network Rail prior to any works commencing.

Additional advice is offered to the developer in terms of meeting Network Rail requirements in terms of future maintenance, drainage, plant and materials, scaffolding, piling, fencing, lighting, noise and vibration and landscaping which have been passed the applicant."

Trees and Landscaping

The Council's Tree Officer advises that "the arboricultural submissions have addressed the tree constraints associated with the proposed development and indicate protection measures for the duration of the scheme. Protection measures as illustrated on the Tree Protection Plan (TPP) are considered adequate for the needs of the site.

I can confirm that it is only the trees situated on the railway embankment that are protected under area Tree Preservation Order (TPO) 1273. This protects trees that are older than 20 years.

The proposed tree removals as listed within section 11 of the Tree Survey report are considered justified and acceptable. The removal of hedges H93-95

is equally acceptable as trees forming these hedges are of limited significance and were planted to conceal the bowls green. The retention of H96 is acknowledged and this is beneficial for screening purposes with regard to the neighbouring site in Mountbatten Close.

Conditions requiring compliance with the submitted Tree Survey and Tree Protection Plan and details of a landscaping scheme are recommended.”

Planning Policies

In determining planning applications, the starting point is the development plan and any other material considerations that are relevant. The adopted development plan in this case includes the Bromley Unitary Development Plan (UDP) (2006) and the London Plan (March 2015). Relevant policies and guidance in the form of the National Planning Policy Framework (NPPF), National Planning Policy Guidance (NPPG) as well as other guidance and relevant legislation, must also be taken into account. The draft Bromley Local Plan is also a consideration of limited weight.

Unitary Development Plan (2006)

BE1 Design of New Development
G8 Urban Open Space
L6 Playing Fields
C1 Community Facilities
C7 Educational and Pre-School Facilities
C8 Dual Community Use of Educational Facilities
NE3 Nature conservation and Development
NE5 Protected Species
NE7 Development and Trees
T1 Transport Demand
T2 Assessment of Transport Effects
T3 Parking
T6 Pedestrians
T7 Cyclists
T17 Servicing of Premises
T18 Road Safety
IMP1 Planning Obligations

London Plan (March 2015)

2.6 Outer London: vision and strategy
3.16 Protection and enhancement of social infrastructure
3.18 Education Facilities
5.0 Overheating and cooling
5.2 Minimising carbon dioxide emissions
5.3 Sustainable design and construction
5.7 Renewable energy
5.6 Decentralised energy in development proposals

5.8 Innovative energy technologies
5.10 Urban Greening
5.11 Green Roofs and Development Site Environs
5.12 Flood Risk Management
5.13 Sustainable Drainage
6.3 Assessing effects of development on transport capacity
6.9 Cycling
6.13 Parking
7.2 An inclusive environment
7.3 Designing out crime
7.4 Local character
7.5 Public Realm
7.6 Architecture
7.8 Heritage assets and archaeology
7.13 Safety, security and resilience to emergency
7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes
7.18 Protecting Open Space and Addressing Deficiency
7.21 Trees and woodlands
8.1 Implementation
8.2 Planning obligations

National Policy:

National Planning Policy Framework (NPPF) (2012): Most relevant sections include:

Paragraph 14: Achieving sustainable development
Para 17: Core planning principles
Paras 29 - 41: Promoting sustainable transport
Paragraph 32: Highway impacts
Paras 56 – 66: Requiring Good Design
Paras 69-78: Promoting healthy communities
Paragraph 72: Delivery of school places
Paragraph 74: Playing fields
Paras 93-103: Meeting the challenge of climate change & flooding
Paras 109-125: Conserving and enhancing the natural environment
Paras 188-195: Pre-application engagement
Paras 196-197: Determining applications
Paras 203-206: Planning conditions and obligations
Paras 215: consistency of local plans with NPPF

National Planning Practice Guidance (NPPG)

Communities and Local Government and Education “Policy statement – planning for school development” - August 2011 (the London Plan para 3.98 (supporting text to Policy 3.18 Education Facilities) sets out that the Mayor’s approach reflects this joint policy statement).

Sport England Planning Policy Statement – A Sporting Future for the Playing Fields of England is also relevant.

Bromley's Proposed Submission Draft Local Plan:

The final consultation for the emerging Local Plan was completed on December 31st 2016. It is expected that the Examination in Public will commence in 2017. The weight attached to the draft policies increases as the Local Plan process advances. These documents are a material consideration and weight may be given to relevant policies as set out in the NPPF paragraph 216 which states:

“From the day of publication, decision-takers may also give weight to relevant policies in emerging plans according to:

- *the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given)*
- *the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*
- *the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).”*

Current draft Policies relevant to this application include:

Policy 21 Opportunities for Community Facilities
Policy 27 Education
Policy 28 Educational Facilities
Policy 29 Education Site Allocations
Policy 31 Relieving Congestion
Policy 32 Road Safety
Policy 33 Access to services for all
Policy 34 Highway Infrastructure Provision
Policy 37 General Design of Development
Policy 40 Other Non-Designated Heritage Assets
Policy 42 Development adjacent to Conservation Areas
Policy 55 Urban Open Space
Policy 58 Outdoor Sport, Recreation and Play
Policy 70 Wildlife Features
Policy 72 Protected Species
Policy 73 Development and Trees
Policy 75 Hedgerows and Developments
Policy 113 Waste Management in New Development
Policy 115 Reducing flood Risk
Policy 116 Sustainable Urban Drainage Systems
Policy 118 Contaminated Land
Policy 119 Noise Pollution
Policy 120 Air Quality
Policy 121 Ventilation and Odour Control
Policy 122 Light Pollution

Policy 123 Sustainable design and construction
Policy 124 Carbon reduction, decentralised energy networks and renewable energy
Policy 125 Delivery and implementation of the Local Plan

Draft Local Plan documents of specific relevance are also:

Local Plan Education Background Document September 2015

In addition the Bromley Primary and Secondary Schools Development Plans (January 2015 and January 2016) are relevant.

Planning History

The site has been the subject of numerous previous relevant applications as follows:

92/02130/OUTMAJ and associated details: Detached Two Storey Block Comprising 20 Two Bedroom Flats With 40 Car Parking Spaces And Formation Of Car Park For Bowling Green Comprising 15 Spaces With Separate Access. Outline. Approved on appeal January 1994

DC/16/02014/EIA: Screening Opinion – No EIA required. 27th May 2016

The following applications are for development at Ravensbourne School, Hayes Lane, Bromley, which are relevant to this proposal:

DC/15/05521 - A planning application for temporary accommodation to take the first year 6FE pupils on the Ravensbourne School site was submitted to the Council on 18th December 2015. This was deferred from Plans Sub Committee and the applicant subsequently appealed against non-determination. On 17th November 2016 Members at Plans Sub Committee agreed not to contest the appeal, and the final decision from the Planning Inspector is awaited at the time of writing this report.

DC/16/04712: Temporary siting of a two-storey structure for educational use (Class D1) for two academic years (until 31 July 2019) and associated external works including access ramp and stairs.
This is a duplicate application for temporary accommodation submitted under ref 15/005521 and the report for this application appears elsewhere on this Agenda.

Conclusions

It is considered that the main planning issues relating to the proposed scheme are as follows:

- Principle of Development

- Compliance with Urban Open Space (UOS) policies
- Educational Policy
- Educational Need
- Site Selection Process
- Playing Fields and Sports Pitches
- Highways and Transport
- Design, Layout and Scale
- Residential Amenity
- Trees and Landscaping
- Temporary Accommodation and Phasing
- Contributions
- Other Technical Issues

It should be noted that this is an Outline application and at this stage the applicant has asked the Council to consider Scale, Layout and Access with Appearance and Landscape reserved for later consideration

Principle of Development

- Urban Open Space

The site is designated Urban Open Space and for the purposes of this application, the up to date development plan comprises the Unitary Development Plan (saved policies), the London Plan and the NPPF. In the first instance the application will be considered in the light of these policies. The weight and relevance attached to policies in the Proposed Submission Draft Local Plan is more limited but is a material consideration in the determination of the application as set out in paragraph 216 of the NPPF. The most relevant policy for this section is UDP Policy G8 which relates to development in Urban Open Space and states the following:

Proposals for built development in areas defined on the Proposals Map as Urban Open Space (UOS), will be permitted only under the following circumstances:

- (i) the development is related to the existing use (in this context, neither residential nor indoor sports development will normally be regarded as being related to the existing use); or*
- (ii) the development 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 the existing development on the site.*

Where built development is involved; the Council will weigh any benefits being offered to the community, such as new recreational or employment opportunities 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 supporting text of this policy advises that UOS is locally important public or private open space identified by individual Councils that needs protection. The identified Urban Open Spaces are considered to be of local significance as they fulfil a specific function in their localities, such as providing important breaks in the urban area. The primary purpose of the policy is to protect the open character of the UOS.

In their Planning Statement the applicant states in the section entitled The Land Use Policy Considerations that *“the 2006 is out of date and para 14 of the NPPF sets out the approach to decision-making when a plan is out of date. It suggests for decision-making that this means granting permission unless there are any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. The considerations when reaching a conclusion on this aspect involve the level of education need, the approach of the emerging development plan, the availability of alternative sites and the benefits of the development.”*

It is considered that this UDP policy is not out of date and the policy also complies with Policy 7.18 of the London Plan which is discussed below. The main elements of the UDP policy in the Proposed Submission for the Draft Local Plan indicate the Council’s view of the way forward for this policy in the future.

Assessing the proposed development solely against the requirements of the UDP Policy G8, it is considered that the current proposal would be contrary to the policy.

Turning to the London Plan, Policy 7.18 supports the protection of locally designated open space stating that *‘the loss of protected open spaces must be resisted unless equivalent or better quality provision is made within the local catchment area. Replacement of one type of open space with another is unacceptable unless an up to date needs assessment shows that this would be appropriate.’*

In their comments in the Stage 1 report from the GLA on this matter, they ask the applicant to demonstrate that the proposal fully complies with the London Plan Policy 7.18 requirements set out above.

In the Planning Statement and the Design and Access Statement, the applicant advises that

- the site has been vacant and disused for a number of years and has become overgrown
- a large part of the site will revert to its community use for sport and recreation
- The large majority of the site will remain open and for outdoor recreation:
 - the total site coverage of buildings is 13,508 sqm Gross External Area

- the total site coverage of pitches, car parking, circulation, hard and soft social and formal play areas is 33492 sqm
- The scheme will deliver high-quality sports pitches and out-of-hours community use, this being its previous use but now almost 20 years ago.

The applicant has not supplied a formal up to date needs assessment to demonstrate that the replacement of one type of open space with another can be justified.

Taking this policy in isolation, the lack of a needs assessment makes it difficult to conclude that the proposed development is policy compliant in respect of Policy 7.18 of the London Plan.

The Proposed Submission for the Draft Local Plan (Nov 2016) indicates the Council's view of the way forward for this Urban Open Space policy. Under paragraph 216 of the NPPF the emerging Local Plan carries some weight dependent upon the stage of preparation, the extent to which there are unresolved objections and the degree of consistency with the NPPF. At this stage, it is considered some weight can be attached to emerging Local Plan Policies.

The emerging Local Plan has taken the unusual step of amending existing UOS policy to reflect the urgent need for the Borough to find school places for pupils in the Borough. The draft policy increases the flexibility for school expansions on UOS sites in existing education use or allocated for education use in the Local Plan and relates this directly to policy support where there is a demonstrable need for additional education buildings.

Draft Policy 55 states:

Proposals for built development in Urban Open Space (UOS) will be permitted only under the following circumstances:

- a** - *The development is related to the existing or allocated use (in this context, neither residential nor indoor sports development, other than sports development related to educational use on the site, will normally be regarded as being related to the existing use); or*
- b** - *The development is small scale and supports the outdoor recreational uses or children's play facilities on the site; or*
- c** - *Any replacement buildings do not exceed the site coverage of the existing development on the site.*

Subject to the clauses above, where built development is involved; the Council will weigh any benefits being offered to the community, such as new recreational or employment opportunities, against a proposed loss of open space.

Where there is a demonstrable need for additional educational buildings sensitive design and siting will be sought to ensure that the impact on the open nature of the site is limited as far as is 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.

It should be noted that the application site was initially identified for education use in the document entitled Draft Allocations, further policies and Designations (September 2015). However, the site has not been brought forward for allocation in the emerging Draft Local Plan.

The proposed new build development to provide a secondary school, would not comply with this draft policy as it provides for the construction of a new school whereas the policy is restricted to the building of extensions or additional buildings where a school is already located in the UOS.

All of the up to date and emerging Urban Open Space policies seek to ensure that proposals would not unduly impair the open nature of designated UOS. In the case of this proposal, the introduction of built development on the site will have an impact on the openness of the site. However, measures have been taken to limit the impact, although this cannot be completely eliminated, as follows:

- Siting the buildings in the south eastern corner of the site adjacent to the built development at the David Lloyd Sports Centre, thereby keeping a cluster of buildings in close proximity to each other.
- Retaining open landscape, in the form of pitches, in the most visible public locations, for example along the street frontage and adjacent to the Rugby Club. This has the effect of co-locating adjacent open spaces which continues the contribution of the site to the overall openness of the area.
- Careful consideration of the external materials for the proposed building and fencing to minimise the bulk of the structures and their appearance within the open space.

The next section of the report will assess whether there are other material planning considerations which may be considered to outweigh the harm to the loss of UOS and justify some loss to the provision of open space on this site.

Notwithstanding the conclusions below, the current adopted and emerging policy position supports the protection of the UOS designation and a new school would not comply with adopted Policy G8, London Plan Policy 7.18 or Draft Local Plan policy 55.

- Educational Policy

This section sets out the national, regional and local planning policy background for considering an application for a new school.

The Education Act (2011) places a statutory duty on Local Authorities to provide sufficient pupil places for every child of school age in their local area and keep this under review. The Academies Act (2012) changed the approach to educational provision and encourages the establishment of new Free Schools. The Borough recognises the need to prepare overall strategies to

meet the current and future supply of Primary and Secondary School places, with Bromley experiencing a particular growth in demand for school places from increases in birth rates and migration.

The NPPF was preceded in August 2011 by a joint ministerial policy statement on planning and education “Policy statement – planning for schools development” which 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”. It sets out the Government’s commitment to support the development of state-funded schools and their delivery through the planning system. In summary it identifies the following:

The Government is firmly committed to ensuring there is sufficient provision to meet growing demand for state-funded school places, increasing choice and opportunity in state-funded education. State-funded schools include Academies and free schools. The Government wants to enable new schools to open, good schools to expand and all schools to adapt and improve their facilities. This will allow for more provision and greater diversity in the state-funded school sector to meet both demographic needs and the drive for increased choice and higher standards. Creating free schools remains one of the Government’s flagship policies. It is the Government’s view that the creation and development of state-funded schools is strongly in the national interest and that planning decision-makers can and should support that objective, in a manner consistent with their statutory obligations. The planning system should operate in a positive manner when dealing with proposals for the creation, expansion and alteration of state-funded schools, and that the following principles should apply:

- There should be a presumption in favour of the development of state-funded schools, as expressed in the NPPF.
- Local authorities should give full and thorough consideration to the importance of enabling the development of state-funded schools in their planning decisions. The Secretary of State will attach significant weight to the need to establish and develop state-funded schools.
- A refusal of any application for a state-funded school, or the imposition of conditions, will have to be clearly justified by the local planning authority. Given the strong policy support for improving state education, the Secretary of State will be minded to consider such a refusal or imposition of conditions to be unreasonable conduct, unless it is supported by clear and cogent evidence.

Paragraph 72 of the NPPF identifies that the government attaches great weight to the need to create, expand or alter schools and says that Local Planning Authorities should work with school promoters to identify and resolve key planning issues at an early stage, while Paragraph 73 of the NPPF says that access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of Communities.

The London Plan in Policy 3.18 Education Facilities supports proposals which enhance the expansion and provision of educational facilities including new build, expansion of existing or change of use to educational purposes. Those which address current and projected shortages of primary school places will be particularly encouraged. The London Plan para 3.98 emphasises the strength of this positive consideration and refers to the joint policy statement on Planning for Schools Development (Aug 2011).

Chapter 13 of the UDP sets out the Council's objectives in supporting the provision of local community services. Policy C1 of the UDP states that proposals for development that meet an identified education need in the Borough will normally be permitted provided it is accessible by modes of transport other than the car and accessible to members of the community it is intended to serve. Policy C7 of the UDP identifies that new or extensions to existing educational establishments will be permitted provided that they are located so as to maximize access by means of transport other than the car and are required to prepare a School Transport Plan. These policies represent the adopted Development Plan policies in respect of education provision.

The emerging Local Plan has been developed on the basis of the evidence base, including an Education Background Paper (Sept 2015) which set out the educational need on the basis of the Council's update of "Planning for Growth – Review of Secondary Education", and undertook an extensive site search of the full range of potential sites, including existing education sites, vacant social infrastructure sites and all sites submitted through the Local Plan "Call for Sites" process, along with sites identified by proposed Free School providers. On the basis of the evidence base the Council consulted on proposed allocations to meet educational needs in the Draft Allocations, Further Policies and Designations Document 2015. The Draft Local Plan was approved for consultation at Executive Committee on July 2016. The evidence base has been recently updated and published in the draft Education Policy Background Paper.

In response to increasing pressure for school places and the emphasis on the need to ensure sufficient places in the London Plan and the NPPF the Proposed Submission Draft Local Plan includes three draft education policies. These are:

Draft Policy 27 – Education - advises that the Council will assess the need for education infrastructure and allocate sites accordingly by safeguarding education sites for the plan period. It identifies *"In all cases new development should be sensitively designed to minimise the footprint of buildings and the impact on open space particularly playing fields, as well as seeking to secure, as far as possible the privacy and amenities of any adjoining properties, whilst delivering the necessary educational infrastructure."*

Draft Policy 28 – Educational Facilities - supports proposals for new educational facilities which meet local need, looking first at opportunities to maximise the use of existing education land. It states:

“The Council will support proposals for new educational facilities which meet local need, looking first at opportunities to maximise the use of existing Education Land or redundant social infrastructure.

Where new sites are required, proposals will be permitted unless there are demonstrably negative local impacts which substantially outweigh the need for additional education provision, which cannot be addressed through planning conditions or obligations, and subject to:

- i. open space and conservation policies*
- ii. the need for the provision locally,*
- iii. highway safety, and*
- iv. the accessibility of the site by means of transport other than the car.*

In all cases, new buildings should be sensitively designed to minimise the footprint, loss of open space and the impact of development, seeking to secure as far as possible the privacy and amenities of any adjoining properties, whilst delivering the necessary educational infrastructure.

Proposals involving the sharing of facilities, including open spaces, between educational facilities, and / or the dual use of educational facilities by the wider community will be encouraged.”

Draft Policy 29 – Education Site Allocations – this policy allocates a number of new school sites for primary and secondary education. It states:

“Subject to Local Plan Policy 27 ‘Education’ the Council will seek to meet the need for education provision over the Local Plan period as identified in the Council’s Primary and Secondary School Development Plans, by allocating sites for educational purposes and re-designating school sites in Green Belt and Metropolitan Open Land as Urban Open Space...

a –allocating the following sites for new/enhanced education provision:

- 1 Westmoreland Road*
- St Hughes Playing Field, Bickley Road*
- Land at Bushell Way, Chislehurst (note: this is for a primary school), and*
- Kentwood Site, High Street, Penge*

b - allocating sites for new education provision, removing them from the Green Belt or Metropolitan Open Land and re-designating them as Urban Open Space, safeguarded as ‘Education Land’ for education development only.....

c- Removing areas within the following existing school sites from Green Belt or Metropolitan Open Land and re-designating them as Urban Open Space, safeguarded as ‘Education Land’ for education development only....

Planning applications will be required to provide robust assessments of the impacts of development, including for example, highway implications, and provide appropriate mitigation to address adverse impacts.

The principle of the provision of new schools is therefore well established in planning policy from a National to a Borough level. The site would offer an option for education facilities that fulfil a need.

Therefore, 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.

- Educational Need

The most recent update of the Secondary School Development Plan, which is reflected in the updated Education Background Paper, was agreed by the Council (Portfolio Holder) in Jan 2016. This indicates the need for 17 additional forms of entry required for 2018/19 which is to be addressed by the expansion of Bishop Justus and the opening of two new schools (one being Bullers Wood Boys School), both of which are currently without permitted sites. Bullers Wood Boys School has been approved by the Secretary of State for Education to open a Secondary School sharing some functions with Bullers Wood Girls.

If this progresses in accordance with the site allocation in the draft Local Plan Policy 29, one of these new schools would be Bullers Wood Boys School and the other could be 1 Westmoreland Road or the Kentwood site. It is considered unlikely that other sites identified for secondary schools at Turpington Lane allotments, Bromley Education Trust and land adj to Edgebury Primary School could be available in the timeframe needed to provide sufficient FE places for 2018/19 due to the time required to change their current designation from Green Belt to UOS through the plan process, if this is ultimately supported at the Examination stage of the Plan.

There are 3 sites that have been approved by the Secretary of State for Education to open a Secondary School, namely Bullers Wood School, Eden Park High School and 1 Westmoreland Road. Planning permission has not been granted for education use and buildings on any of these sites. At this time, planning applications have been received for Bullers Wood School on St Hughes Playing Fields and Eden Park High School on the South Suburban Co-Op site.

In addition there is Ministerial approval for the opening of a University Technical College (UTC) which has been altered to take in students from 11yrs at 1 Westmoreland Road. Pre-application discussions for the site at 1 Westmoreland Road are underway and the current programme for this site is to submit a planning application in January and be open for pupil intake in September 2019. Subject to a planning application being submitted and agreed this provision will contribute to the need for imminent secondary provision. However, the timeframe to meet the need, as identified above, is extremely short.

If two secondary Free Schools were able to secure permission and open in temporary accommodation in September 2017, the projections from the Secondary School Development Plan 2015 – 2018 still indicate an

outstanding need of 95 places (3FE) by 2018/19, rising to 311 (10/11FE) in 2019/20.

If Bullers Wood School does not go ahead the shortfall by 2019/20 is projected at 491 places (16/17FE). Without both Bullers Wood School, which is elsewhere on this agenda for consideration the shortfall experienced over the last couple of years, resulting in the provision of bulge classes, will increase resulting in a projected shortfall of 731 places (24FE or 3 x 8FE new schools) by 2019/20.

It should be noted that the planning application for Bullers Wood Boys School appears elsewhere on this Agenda.

Turning to the longer term education need in the borough, the figure of up to 34 Forms of Entry within the Council's Secondary School Development Plan 2016 is based on birth rates and school census information. This figure is based on the 5% that the Pupil Places Working Group agreed should be added to the base GLA school roll projections to provide a contingency for fluctuation in growth and parental choice. The 34FE relates to 1,022 Year 7 places required in 2022 compared with the base school population in 2014/15.

According to the 2016 Summer School Census there are currently 1,292 places vacant across the whole of the secondary sector (ages 11-19). This equates to about 5% of total places. However, year 7 only have just over 150 places free. These 1,292 vacant places are spread across all years including sixth form, so these are not places that could automatically be offered as Year 7 places. Furthermore, based on all years, 9 existing secondary schools are already over capacity and need to adjust their intake to their respective capacity.

The ongoing growth in demand for secondary school places is also indicated by having proportionally fewer places available in Year 7 than Year 11. In Year 7 there are 160 spare places across the Borough, but these spare Year 7 places are in the east of the Borough (Kemnal & Priory) masking the shortfall in the Northwest & Centre of the Borough where the demand is highest. According to the GLA 2015 Pupil Roll Projections there is an estimated increase in demand of 5,444 11-18 age secondary places between 2016 and 2024. If you subtract the 1,292 places currently surplus within Bromley Schools as indicated by the Summer 2016 School Census, this suggests that there is currently deficit of 4,152 places by 2024. This equates to a shortfall of 138 classes.

In addition, a 5% allowance for parental choice (recommended in guidance and agreed by the Council's school place working group) would add a further 6FE. Admissions are reporting 200 additional admissions for 2017 - close to the GLA predicted 204 deficit - and late applications can be anticipated which may increase this further. It is clear from analysis that Bromley needs an additional 2 functioning secondary schools by Sept 2018, to provide for an 11 or 12 FE deficit which makes no allowance for parental choice.

There is, therefore, a recognised and strong case of educational need within the Borough that is required to be met by current pupil place legislation.

The decision “not to contest” the temporary provision for the Eden Park Academy to provide 6FE on Ravensbourne School, along with the permitted 2FE expansion at Bishop Justus, addresses the deficit for Sept 2017 and 2018, albeit in the short term only. At the time of writing this report, the Council has not received the Inspectors formal decision on this appeal.

Members should note that a duplicate planning application for an identical proposal for temporary accommodation for new pupils for Eden Park High School has been submitted (ref 16/04712) and the report for this proposal appears elsewhere on this agenda.

The Applicant in their submissions have also outlined this need and although this may be set out in a different format, the same evidence base and statistics has been used to set out their position and the case of need for educational sites and a free school on this site to serve the Borough. The case of need submitted is therefore considered to address the requirements identified by the GLA in their Stage 1 referral letter.

The Council has a statutory duty to secure sufficient school places under the Education Act (1944) and this is a pressing concern which from a planning perspective would be a material consideration. The NPPF para.72 and Aug 2011 joint ministerial statement also require Local Planning Authorities to give significant weight to the need to create schools. This is reflected in The London Plan (2016) Policy 3.18 and draft Local Plan Policy 28 “Education Facilities” which require that proposals for new schools should only be refused where there are demonstrable negative local impacts which substantially outweigh need for the provision and which cannot be addressed through the appropriate use of planning conditions or obligations.

Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The Planning Practice Guidance advises that “it is for the decision maker to decide what weight is to be given to the material considerations in each case, and (subject to the test of reasonableness)”.

In considering the balance to be made in respect of material considerations it is important to note that:

- the “great weight” that the NPPF attaches to the need to create, expand or alter schools.
- the policies and allocations in the Draft Local Plan propose to address the imminent shortage of secondary school places highlighted within the Secondary Schools Development Plan
- the lack of alternative provision, evidenced within the Local Plan Education Background Paper, capable of delivery within the necessary

timeframe, to meet the statutory duty under the Education Act to secure sufficient school places.

The Education Department have set out the key implications for education provision in Bromley, as follows:

- We have a serious issue around meeting our statutory sufficiency duty from September 2017 unless the supply of school places is increased.
- If nothing is done there will be a deficit of 702 places or 23 FE [per year] in 2022. This level of increase matches the quantum of increase in pupils that has been experienced in the primary sector.
- There will be a 6 or 7FE deficit September 2017. Even if Bishop Justus goes to 8FE in September 2017 (this is the only scheme that currently has planning permission) there is still a need for at least one of the proposed Free Schools to open. This is particularly the case as surplus places in existing schools will continue to be focussed in the East of the Borough whilst growth is in the West and Centre.
- Due to the level of need, in March 2017 we are unlikely to be able to offer every child a place through the co-ordinated admissions process even if the 2 Free Schools open. This problem will be exacerbated if neighbouring Boroughs are unable to offer additional places as in previous years.
- Admissions are currently reporting around 200 additional applications for secondary school places for September 2017, and this is before late applications are considered.

There is therefore policy support nationally, regionally and in the draft Local Plan for the provision of necessary school places. The demonstrable and imminent need for places and the emerging Local Plan are material considerations to the overall determination of the planning application.

- Site Selection Process

The Proposed Submission Draft Local Plan, as outlined above, has gone through a process of evidence based assessment and an extensive site selection process to identified sites that could be available for expansion of existing schools and new school sites to address the need for primary and secondary school places due to rising birth rates. This evidence and the site selection process have been agreed and accepted by the Council Education Select Committee and approved by the Education Portfolio Holder on behalf of the Council.

The Secondary Schools Development Plan (2016) indicates a need for an additional 34 FE by 2022, with almost half required by September 2018. To date 2FE have been permitted.

Secondary school catchments are significantly larger than for primary schools which enable expansions at existing schools. However, in providing secondary school places the local authority needs also to satisfy the statutory

requirement to provide a reasonable offer, including consideration of the travel distance and times for a child to access a school place.

To address the emerging need for additional school places the Council has undertaken a sequential approach in two stages; firstly, the assessment of the capacity of existing education sites, redundant social infrastructure and other policy compliant sites and secondly a proposed policy alteration to increase the flexibility of Urban Open Space (UOS) in respect of the expansion of existing educational facilities.

The first assessment of sites, involving the expansion of existing schools, does not identify a sufficient number of sites and forms of entry to address the identified need.

Therefore it has been necessary to identify sites for new schools. This involves sites which could be policy compliant in terms of land use but also the redesignation of existing school sites which are currently located in the Green Belt (GB) and on Metropolitan Open Land (MOL) as Urban Open Space along with specific site allocations.

The assessment found that there were insufficient policy compliant sites to fully address the identified need (known as Group 1 sites).

To identify sites for redesignation, a sequential approach to meeting the projected need has involved an assessment of the full range of potential sites. The Local Plan Draft Policies and Designation consultation document (Feb 2014) involved a call for sites. All sites were subsequently assessed where appropriate for their potential to address the education need, along with sites identified by proposed Free School providers and other vacant education and social infrastructure sites. The demonstrable absence of alternative sites presents exceptional circumstances to justify assessment of potential educational sites in the GB and MOL for expansion and for new specific education allocations.

Initially sites were grouped relating to existing strategic policy constraints. Sites in each group were assessed in line with the approach to social infrastructure and specifically education, set out in London Plan Policies 3.16 and 3.18 and ranked. The individual merits and recognised material considerations relating to each site were then assessed against local planning policy. Preferable sites were then considered by the Local Development Framework Advisory Panel in order to bring forward recommended site allocations for the draft Local Plan.

The assessment findings set out sites with the potential to deliver the education provision through policy compliant sites or through redesignations which cause least harm to the GB and MOL in line with the NPPF and as required by the Mayor. Group 1 sites have been identified which could potentially facilitate some expansions to schools over the Local Plan Period and two sites for new schools.

However, these sites are insufficient to address the projected need and it is therefore necessary, on the basis of the site rankings, to increase the flexibility of the Council UOS policy in relation to education development for existing schools. This proposed increased flexibility to the UOS policy produces another three sites ranked A with potential for expansion. However, collectively the A ranked sites are insufficient to address the need outlined in the approved School Development Plan 2016 and it is therefore necessary to assess the potential of other sites.

Whilst school expansions contribute significantly to meeting the education need over the plan period much of the need will be met through the provision of new 'Free Schools'. Collectively the sites in ranked Groups 1, 2 and 3 were unable to deliver sufficient new sites hence the assessment of the Group 4 sites. This group includes two ranked B sites, being St Hughes Playing Fields and one which is designated Green Belt.

As a result of this site selection process, two free school sites which are available and deliverable were identified namely, Bullers Wood School for Boys and Eden Park High School (previously known as The Beckenham Academy). However, of the two sites, only the site at St Hughes Playing Fields has been taken forward as an allocated site in the draft Local Plan.

To support the planning application, the Applicant has also undertaken their own site search and assessment process, in conjunction with the EFA, of all potential sites that could meet the identified education need and to demonstrate why shortages cannot be addressed on alternative sites. The findings of the report are summarised below.

The initial criteria for the site search required sites to be located close to the Beckenham and Penge wards, a site or building large enough to accommodate 9,701 sqm (98,705 ft²) which would accommodate 1200 pupils, large enough to provide external space for informal outside space and, ideally, sport pitches. The sites were also assessed against the criteria of the school and Department of Education (DfE)/Education Funding Agency (EFA) which include availability for acquisition (on-market), value to the public purse, large enough, capacity for walking/cycling in the catchment area, preferably conversion of an existing building.

The search started in October 2014 and by March 2015 five sites had been identified that were then assessed in more detail for their suitability and only 2 were found to be feasible, namely the application site at the former South Suburban Co-Op sports ground in Balmoral Avenue (4.7ha designated Urban Open Space) and the Cegas sports ground in Worsley Bridge Road (2.2 ha designated Metropolitan Open Land). The report recognises that both sites have high planning risk and involve development of undeveloped land with protective designations.

Both sites were then further assessed for the characteristics of the site, availability, suitability for development, deliverability and affordability. At the time of the applicant's site assessment, the Local Planning Authority were

supporting future educational development on the Balmoral Avenue site in the draft Local Plan process (the site was subsequently removed) but not on the Cegas site. In addition, the sites are located close to the identified are for a new school and freehold acquisition terms were achievable on both sites.

On availability and being suitably located, along with being larger and having lower planning risk in terms of protective designation (than the Cegas site), the Balmoral Avenue site was selected by the applicant.

The report goes on to say that the proposed scheme will provide benefits beyond the education need including retaining a substantial amount of open space for outdoor recreational use and providing pitches and training areas for community use.

In addition, the report comments on the draft sites for new schools identified in the draft Local Plan as follows:

- *The following sites confirm the approach in the Council's Proposed Submission Draft Local Plan that they would not be suitable for co-location: Beaverwood School, Ravens Wood School, Darrick Wood School*
- *The following sites have been already been identified for education use: St Hughes Playing Fields, 1 Westmoreland Road, Widmore Centre*
- *Turpington Lane Allotments – the site is not a suitable size for a school and not available or deliverable within sufficient timescales for Eden Park School*
- *Kentwood site – this is not currently available within the timescales to provide 17 secondary FE by 2018/19 and it has only been identified for 4 FE whereas the Balmoral Avenue site could deliver 8FE to help identify the considerable need in the borough.*
- *Bromley Education Trust on Hayes Lane – no feasibility study to demonstrate that the 2.9ha site is suitable for a secondary school, the site is in Green Belt and no school has been identified. The site is not suitable for Eden Park School.*
- *Land adjacent to Edgebury Primary School – the site is Green Belt and will need to be reassigned through the Local Plan process, a new school would have significant visual impact on the openness of the Green Belt, low accessibility for public transport and loss of existing playing fields. The site is not available due to the time needed to redesignate the site so is not suitable to enable delivery of Eden Park School within a suitable timeframe.*

This further identifies that alternative sites for new schools are limited within this part of the Borough and in all cases have restrictive designations that policies seek to preserve, are not available, not suitable for education use or too small. The deliverability of other sites for new schools is therefore restricted and the need for the application site for a school has been identified.

The GLA, in their Stage 1 comments, requires an alternative site search to justify development on existing designated sites and open land. It may be considered that the site selection process carried out by the applicant as set out above, and the initial identification of the site as part of the Local Plan process are the strongest justification that would be possible in this regard at the present time, acknowledging that the site was deleted from the draft Local Plan list of sites for schools.

Playing Fields and Sports Pitches

The NPPF para.74 and the London Plan Policy 3.19 preclude the loss of open space, sports and recreational land, including playing fields and wherever possible, multi-use public facilities for sport and recreational activity should be encouraged. Policy L6 of the UDP seeks to protect the loss of playing fields unless an assessment of open space provision reveals a surplus. Any deficiency could therefore be off-set against existing provision or re-provision. Draft Policy 58 also seeks suitable demonstration of existing pitch facilities and the re-provision to a higher quality if facilities are lost. NPPF para. 74 states that existing open spaces and playing fields should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

London Plan Policy 3.19 identifies that proposals that increase or enhance the provision of sports and recreation facilities will be supported; whereas those that result in a net loss of sports and recreation facilities, including playing fields should be resisted

The GLA Stage 1 report requires the applicant to demonstrate that there would not be a loss of sports facilities for which there is a defined need, and the applicant would need to demonstrate that the existing playing fields do not currently meet an identified current or future demand as they stand. The applicant needs to confirm what consultation with local residents, nearby schools, local cricket, rugby and football clubs has been undertaken so that any displacement can be assessed. A community use plan, which makes available the new sports facilities for the use outside school hours should be secured.

In terms of the use of the playing fields the applicant advises that they have not been in use since the early 1990's. The current proposal amounts to a partial loss of green space and playing fields on the site.

Comments have been received from Sport England (who are not a statutory consultee for this application as the pitches have not been in use for at least 5

years). Sport England have contacted the ECB, England Hockey, the FA, the RFU and the LTA who have expressed possible interest from local clubs for the use of both the internal and external facilities that would be provided on the site.

Following some changes to the scheme requested by Sport England, they now consider that the proposal meets Sport England's Playing Fields Policy E5 and Paragraph 74 of the NPP, subject to conditions requiring the submission of a community use agreement, a detailed assessment of the ground conditions of the land and implementation of the findings of the report and the construction of the Sports Hall and MUGA to Sport England's Design Standards. These have been recommended accordingly.

For the reasons above, it is considered that there is no overall loss of playing pitch provision on the site and high quality outdoor pitches and indoor sports facilities are to be provided. This, therefore, accords with the fundamental principle of the policies which seek to resist any loss of playing pitches and playing fields.

Highways and Transport

The NPPF recognises that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability objectives. All developments that generate significant amounts of movement should be supported by a 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 in Paragraph 32 that development should only be prevented or refused on transport grounds where the residual cumulative impacts are severe.

London Plan and UDP policies encourage sustainable transport modes whilst recognising the need for appropriate parking provision. Policies T1, T2, T3 and T18 of the UDP are relevant and car parking standards within the UDP should be used as a basis for assessment. The requirements for car and cycle parking are laid out within Tables 6.2 and 6.3 of the London Plan as subsequently amended. In addition, the requirements of Policy 6.13 require that 1 in 5 spaces should provide electrical charging points. Consideration should also be given to the location of the required 10% of wheelchair spaces and their proximity to the respective wheelchair accommodation. Cycle spaces should also be provided under these policies.

The applicant has submitted several documents relating to transport and highway issues, namely a Transport Assessment, a letter dated November 28th, an email dated November 17th with details of predicted use of public transport, a Technical Note responding to comments from TfL received on

December 21st and a Travel Plan. The reports assess the impact of the development on different travel modes available to pupils and staff

- Proposed Access Arrangements

Access is a matter to be considered at this stage for this outline application.

The development proposes 2 new vehicle access points to Balmoral Avenue. A two-way access will be provided set back from the north eastern boundary and an exit only access will be in the centre of the frontage. The vehicle entrance access leads into the frontage car park area and also to the access road that runs along the eastern boundary up to the main school car park.

The submitted plans show access to car parking spaces which are identified as parking for staff only. Beyond this parking is a wider roadway which will provide for on-site coach parking, when required, and also a pupil pick-up and drop off area for approximately 5 cars. It is intended that car borne pupils can be dropped in this area and cars will then exit the site to Balmoral Avenue. Revised plans show that the exit to Balmoral Avenue will be left turn only, preventing cars leaving the site from turning right along Balmoral Avenue. This is to help alleviate congestion at junctions in Eden Park Avenue, the details of which are discussed later in this section of the report

Two pedestrian access points are also shown; one adjacent to the main vehicle access close to the north eastern boundary and the other set back from the north western boundary. The latter is also shown to provide cycle access. Once on site pedestrians will make their way to the main pedestrian route from the frontage of the site to the main school building which runs between the proposed football pitch and the internal access road. Safety measures to ensure adequate protection of pupils from moving traffic where internal roads and pedestrian routes are next to each other is required and a condition requiring submission of details is recommended.

Plans showing the swept paths for the new access and egress to the site and the drop-off and pick up area, which is also used for coach parking when necessary, have also been submitted.

The Highways Officer advises that the configuration of the new access points is acceptable in terms of vehicle and pedestrian sightlines in principle, however a condition requiring the submission of detailed design of the junctions in this respect is recommended.

To ensure that the vehicle access and internal parking arrangements are controlled to prevent unauthorised use, a condition requiring the submission and approval of a Car Park Management Plan is also recommended.

- Impact of traffic generation on the capacity of the Strategic Network

The submitted TA has identified the proposed traffic levels and these have been sourced from travel survey data of staff and pupil car borne levels and

modal splits at Ravensbourne School. The worst case scenario estimates that a total of 192 arrivals travelling along Balmoral Avenue and 35 park and stride arrivals on Eden Park Avenue or Upper Elmers End Road in the morning with 156 arrivals and 26 arrivals respectively in the afternoon. The applicant advises that the target level is 71 arrivals along Balmoral Avenue and 18 park and stride in the morning is expected to be met through the implementation of a School Travel Plan.

To assess the impact of the development on the local highway network, the applicant has carried out Transport Feasibility Assessments of four junctions that could be affected by the development, namely:

- Balmoral Avenue/Upper Elmers End Road,
- Balmoral Avenue/Eden Park Avenue,
- Eden Park Avenue/Croydon Road, and
- Dunbar Avenue/Eden Park Avenue.

Initial findings identified that the junction at Eden Park Avenue/Croydon Road would exceed the accepted Ratio to Flow capacity (RFC) standard which would result in greater queuing and delays than currently exist for two 15 minute periods from 08.15 to 08.30 and 08.30 to 08.45 during the AM peak. The results based on the target traffic generation showed the junction exceeded capacity for one 15 minute period between 08.00 and 08.15. The results for all other junctions show that the traffic generated by the development would not exceed the Ratio to Flow capacity, thereby not significantly affect the operation of these junctions.

TfL consider that the approach to trip generation and modal split to be robust. However, they have expressed concern about the impact on the surrounding highway network as follows:

At the junction between Eden Park Avenue and the a222 Croydon Road, which forms part of the Strategic Road Network (SRN), the capacity assessment indicates that the junction will perform over capacity in the AM peak as a result of the proposed development. Despite Travel plan modal shift targets, TfL considers that the development will have a significant impact on the SRN and therefore is not compliant with London Plan Policy 6.3.

To address this concern, TfL have indicated a potential solution as follows:

To alleviate the impact of the proposed development on the junction between Eden Park Avenue and Croydon Road, the applicant should consider the implementation of a one-way entry and exit system with a right-turn ban on the exit on to Balmoral Avenue. This would have the effect of preventing vehicles from routing north bound on Balmoral Avenue from the site to disperse the traffic on the wider network, via Balmoral Avenue and Upper Elmers End Road which is less congested. The junction geometry should be designed as such to physically deter right-turn manoeuvres from the site. This should be accompanied by swept path analysis to consider the movement of all vehicles including larger vehicles (such as coaches and refuse).

In response, the applicant has reviewed the Ratio to Flow capacity data to assess the impact of the suggestion for a left-turn only exit from the car park to assess the impact on the Balmoral/Upper Elmers End Road and the Eden Park Avenue/Croydon Road junctions.

The submitted data shows that the revised exit arrangements will reduce predicted car departure trips to the north by 47 which would have a reduction on the affected junction. There would be one 15 minute period in the AM peak when the RFC standard was exceeded but this is by less than the original predication and would result in less queuing traffic at the junction. The applicant advises that the predicated capacity is not considered unreasonable in the network peak period and therefore there is some benefit in providing and exit arrangement when traffic leaving the school site turns left out only.

The operational capacity of the Balmoral Avenue/Upper Elmers End Road junction has also been tested to consider the impact of all vehicles using the on-site drop off facility turning left out of the school site. The data shows that the junction has the capacity to accommodate this additional traffic and there would be no adverse queuing or capacity problems as a result.

TfL have provided revised comments which state that:

the proposed access arrangements have been amended to provide a one way route, with left turn only restriction on the egress to Balmoral Avenue, to alleviate the impact on the junction between Eden Park Avenue and Croydon Road. This will be subject to a detailed design process, including a Road Safety Audit, to be approved by the Council and should include signage to enforce the banned right turn manoeuvre.

A condition to this effect has been recommended.

In summary, the application will have an impact on the surrounding road network. The relevant data submitted by the applicant is considered to be robust by Transport for London. The predicted traffic levels from the development will be an adverse impact on one junction, namely Eden Park Avenue and Croydon Road, which is already overcapacity, for one 15 minute period in the AM peak. The applicant has submitted a solution whereby traffic leaving the on-site drop off area hall turn left only and this has reduced pressure on this junction, although it is still over capacity compared with the existing situation. However, this is not considered to be unreasonable in the network peak period.

On the basis of the information above, it is considered that the predicted impact on the highway network and on highway safety is acceptable.

- Draft Travel Plan

A draft School Travel Plan has been submitted with the application. The plan aims to minimise the impacts of the school on the surrounding environment

with regard to vehicle trips and congestion. The objectives include the increased use of public transport and walking by both pupils and staff. The Travel Plan sets out the measures that the school propose to engage to reduce the dependence on car borne journeys as a travel method to and from the school.

The submission of the Travel Plan is acceptable in principle and is supported by TfL and the GLA and needs to accord with planning policies and Policy 6.11 of the London Plan. Although questions have been raised by local residents in regard to its implementation and practical benefits, it is a necessary requirement and the proposals are acceptable in principle. Its measures and implementation could be secured by a condition.

- Car Parking

Submitted details and data in respect of drop off and pick up times have been provided for the worst case scenario where the school is running at full capacity and also where the predicted reduction in car borne trips that could be achieved with an active Travel Plan have not been achieved.

In the worst case scenario there is insufficient number of on-street parking spaces in Balmoral Avenue, Eden Park Avenue and Upper Elmers End Road to accommodate all of the predicted vehicle demand in the AM and PM peak times, should all cars arrive at the school at the same time. However, it is unlikely that this would be the case and to reduce the demand for spaces, the applicant has advised that the two 6th form years leave the site at 5pm.

A wider parking survey in the TA has shown that there are spaces beyond these roads during peak times that could be used for park and stride.

Taking account of the measures in the Travel Plan to reduce demand for car parking, the number of car arrivals and park and stride trips is predicted to fall to levels where these vehicles can be accommodated in Balmoral Avenue, Eden Park Avenue and Upper Elmers End Road.

To further ease demand for on-street parking at pick up and drop off times, the frontage car park will provide drive through access for off-street drop off. The applicant has calculated that with space for 5 cars on the site at any one time with a 20-30 second stop time, between 150-225 drop-offs can be made in a 15 minute interval.

It is also noted that the intake of pupils to the school will be incremental with 540 pupils joining in 2019 and a further 180 pupils each year until 2023. The applicant advises that this will allow time for the Travel Plan to become established and therefore the amount of pupil travel by car can be restrained.

For the proposed arrangements for dropping off pupils via the frontage car park to work, it will be necessary for a Car Park Management Plan to be submitted and approved by the Council and then implemented by the school.

A condition has been recommended and the CPMP should include the following information

- Operating times of the school and facilities available for community use.
- Management arrangements at the beginning and end of the school day for pupil drop-off and pick-up. The layout envisages a barrier to control access to the rear car park during the school day.
- Management arrangements at the beginning and end of the school day for staff parking.
- Management arrangements at the end of the school day on weekdays and at weekends for the community use of school facilities.

In terms of staff travel, the number of staff, support staff and catering staff envisaged for a fully operational school is approximately 120. Based on the hands up survey at Ravensbourne School, it is expected that approximately 83% of staff will travel by car borne modes. The 2 car parks shown on the plans will provide a total of 103 parking spaces, which includes 5 disabled spaces. On this basis, it is envisaged that there will be sufficient space on site to accommodate the predicted demand for staff parking

It should be noted that TfL strongly advised that the applicant should reduce the number of on-site car parking spaces proposed.

The applicant has considered the request and advises as follows:

- London Plan policy 6.13, para 6.42j allows a more flexible approach to parking in Outer London.
- Balmoral Avenue is a residential street with many properties having off-street parking. Parking outside schools is an emotive subject for residents and can lead to inconvenience, complaints and safety concerns.
- For this reason, parking for staff is provided on site as well as some provision for pupil drop-off and pick-up.
- The School proposals are supported by the School Travel Plan and targets have been set which are considered realistic by TfL.
- Nevertheless, some pupils will travel by car and therefore some provision is proposed at the beginning and end of the school day, in an effort to mitigate the potential concerns of residents living local to the school.
- It is considered that reducing the proposed level of parking would lead to increased concern from residents.
- With regard to the operational capacity concerns of the Croydon Road junction, reducing car parking for staff would not assist, since there are no staff departures in the AM peak.

TfL has expressed disappointment that proposed car parking has not been reduced. They have advised that the demand and use of the parking should be monitored via a robust Car Park Management Plan, the submission of which should be secured by condition.

- Non car borne travel, including public transport, cycling and walking

The TA has identified the travel modes for pupils to and from Eden Park High School using a whole school 'Hands Up' survey of pupils at Ravensbourne School in May 2016. The survey revealed the following results;

Travelling to School – 29.2% walk; 1.2% cycle; 13% car; 58.6% bus; 4.8% train

Traveling from school – 31% walk; 1.2% cycle; 3.2% car; 59.8% bus; 4.8% train

For walking, the reports set out that the desirable walking distances for schools, including walking distances to bus stops, as set out in the recognised guidance documents and looks at the local footpath network. The report concludes that the bus stops are readily accessible using existing streets and are within the maximum recommended walking distance identified in the IHT publication entitled 'Guidelines for Planning for Public Transport in Developments' and within the PTAL assessment area and is considered that journeys on foot are a realistic prospect for future staff, pupils and visitors to the site.

For cycling, the report considers the availability of cycle routes and cycle distances from local residential centres within 5km of the site. It also looks at the London Cycling Guide for infrastructure advice. The submitted plans show 225 cycle parking spaces for staff and pupils which, the applicant advises, corresponds to the London Plan 2015 standard in this respect. This section concludes that there will be adequate cycle storage on the site and given the age of pupils this could be attractive to both pupils and staff and will be encouraged.

Transport for London initially commented that an additional 17 spaces were required to meet the London Plan. The applicant has submitted amended plans showing the provision of 242 cycle parking spaces which is now considered acceptable.

For bus travel, the TA report sets out distances to bus stops in Upper Elmers End Road and Eden Park Avenue. Access to north and south bound buses on Upper Elmers End Road is a maximum of 400m from the school gate with similar distances for buses along Eden Park Avenue.

Transport for London requested additional information from the applicant which has been supplied. TfL has assessed the information submitted by the applicant in respect of the impact on buses in the school catchment area and advises that the additional trips envisaged can be accommodated on the network. They go on to say that the school should encourage students to walk to alternative bus stops to disperse the demand and requests that the school consider options of stagger the arrival and departure times of pupils to also aid dispersal for bus travel.

The applicant advises that they will consider staggering the arrival and departure times for the 2 6th form year groups. This measure is referred to in the Travel Plan.

For train and tram travel, the closest station is at Elmers End which is 0.85km from the school gate which is within the maximum walking distance threshold in the Institute of Highways and Transportation Guidance. There is also a National Rail train station at Eden Park which could be used by pupils.

- Highway impact of community use

The applicant has provided details of the proposed community use that they envisage for the school. This involves the use of the sports hall and its integral dance studio and the Multi Use Games Area (MUGA) It is envisaged that the football pitch will be used for community purposes but details of the impact on the highways network has not been submitted at this time.

In terms of traffic generation, the impact of the proposed community use is assessed in the document dated November 28th 2016. Community use will start at 18.00 and the site will be cleared by 21.30 on weekdays and from 09.00 to 16.00 on Saturdays and Sundays. The applicant predicts that use of the school hall and dance studio could generate up to 80 people and the MUGA could generate up to 72 people at any one time totalling 152 people, if each of these facilities was being used to its maximum extent at the same time. In addition, the applicant advises that the community uses will not operate on those occasions when car parking is not available due to other school events taking place.

The on-site frontage car parking would be available from 18.00 and the parking in the main car park would be available from 18.30. The main highway effect would be between 17.45 to 18.15 on weekdays which is after the evening peak identified in the Transport Assessment. The National Travel Survey 2015 suggests that for all trip purposes 64% of all trips are made by car. On this basis, if all the facilities are used at the same time, around 97 community car trips could be generated.

In terms of the impact on the highway network, the TA has considered the impact of much higher traffic flows generated during pupil pick up and drop off times and found that the operational capacity of the 4 junctions can accommodate these higher Ratio to Flow rates. Therefore, it is anticipated that the traffic generated from the worst case scenario for community use would not adversely affect the strategic capacity of the highway network.

In term of car parking availability, the frontage and main car parks, which provide 103 parking spaces, will be available from 18.00 and 18.30 respectively and it is considered that this will accommodate most of the visiting cars. The TA on-street car parking surveys of Balmoral Avenue and surrounding streets indicate a vacancy rate that could accommodate additional cars if the need arises. Details of the community related use of proposed car parks will be included in the Car Park Management Plan

On this basis, it is considered that the traffic generated by the proposed community uses can be accommodated by the highway network and in the proposed car parks or using vacant on-street parking spaces.

- Servicing and refuse collection

All refuse collection, servicing and deliveries to and from the site will take place from the proposed access to Balmoral Avenue. A bin store area is shown adjacent to the main school building.

Plans showing the swept paths and turning area in the main parking area have been submitted which show that large vehicles can manoeuvre around the proposed parking spaces in this area. The plans also show that large vehicles can manoeuvre around the proposed frontage car park area and can leave the site using the left turn only exit access.

- Highways summary

There is no doubt that introducing a new school into a primarily residential area will generate a significant amount of activity and will have an impact on the highway network and local parking provision.

The applicant has presented evidence regarding all aspects of the impact of different travel modes by staff, pupils and community use of the school after hours.

The reports conclude that the local highways network can accommodate car borne staff and pupils at peak AM and PM times, taking account of the exit arrangements of the car park and the measures that the school envisages implementing to deter car borne travel through the School Travel Plan, which have been supported by Transport for London.

In terms of demand for car parking for staff it is considered that this can be accommodated within the proposed on-site car parks. For pupils, it is considered that the surveyed on-street parking capacity on local roads, the provision of an on-site drop-off facility and the implementation of a Car Park Management Plan will enable car borne pupils to be accommodated without causing unacceptable traffic congestion in Balmoral Avenue. The school anticipates reducing the number of predicted car borne pupils, through the Travel Plan, by the time the school is fully operational

In terms of the community use, it is considered that the likely traffic generation from the use of the MUGA, the main sports hall and dance studio and the football pitch can be accommodated using on-site car parking and vacant on-street car parking spaces in the immediate and vicinity further afield. Detailed consideration in this respect can be undertaken during the drafting of a community use agreement to further mitigate the impact of out of hours use of the school.

Overall, the highways impact of the development is considered acceptable and in accordance with identified policies.

Design, Layout and Scale

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.

This is an Outline application and, in this instance, Layout and Scale are to be determined at this stage with appearance and landscaping retained for future consideration as Reserved Matters. The applicant has not provided any information at this stage to indicate the likely appearance of the building or the proposed landscaping treatment within the site.

In terms of layout and scale, the relevant policy requirements are set out in Policy BE1 which requires new development to complement the scale, form, layout and materials of adjacent buildings and areas, Development should not detract from the existing street scene and the space around buildings should provide opportunities to create attractive settings.

The Design and Access Statement sets out the design evolution process for the site and the final layout for the site takes account of feedback from public consultation and pre-application advice from planning officers.

The layout of the site shows the main school building and the sports hall located together in the south east corner of the site. This sets the buildings to the rear of the site. There is clearance 17.3m from the south-east elevation to the boundary with the David Lloyd Sports Centre, which is a group of buildings of comparable size and configuration to those on the application site. Clearance to the southern boundary, which backs on to the elevated railway, is 3m. The nearest rear elevation of a residential property is 60m to properties in Lloyd Way which is separated from the building by the elevated

railway. The rear elevation of properties in Upper Elmers End Road, which have uninterrupted view of the new buildings, is 86m from the main building.

This will result in the built form of the development being located as far as possible from many of the residential properties that back on to the site as possible in an effort to reduce the impact of the development on these neighbours. In addition, the buildings will be set back as far from the front boundary of the site as possible which will limit the visibility of the buildings from the street.

It is considered that the design for the site layout and configuration of the proposed buildings has limited the impact of the introduction of the new buildings within the Urban Open Space, albeit there remains an obvious impact on the openness of this green space as a result of the built development proposed.

The remainder of the site accommodates playing pitches and the proposed car parking. The main car park is set to the east of the main school and behind the Sports Hall which sets it a considerable distance from residential properties. The frontage car park is set away from the boundaries with properties in Mountbatten Close and No 45 Balmoral Avenue, in order to provide some separation and protection from noise generated by school traffic. Submitted plans also indicate that acoustic fencing will be provided around these properties details of which can be secured by a detailed condition.

Playing pitches cover most of the remainder of the site and will make a significant contribution to the landscape of the site. There will be activity resulting from the use of the pitches. However, the applicant has indicated that the impact of this can be minimised using acoustic fencing around the site and tree and shrub planting along the most affected boundaries.

In terms of scale, the overall height of the 3 storey main building will be 12.90m and the sports hall will be 9m high. In order for the development to be acceptable to the Environment Agency in terms of flood risk, the finished floor level of the development must be no lower than 37.66m AOD or 150mm above the existing ground level, whichever is the greater. The submitted topographical plans show this part of the site between 38m and 39m AOD which will result in the tallest building being just over 13.5m above the existing ground level or 52.90 AOD.

Taking information from the Design and Access Statement, the proposed buildings would occupy approximately 28% of the site with the remainder set aside for pitches, car and cycle parking, landscaping and servicing area.

In summary, it is considered that the proposal would result in development that respects the scale, form and layout of adjacent buildings and areas. The main buildings are set back from Balmoral Avenue and the frontage of the site retains an open appearance with views into the site. In addition, the layout provides space around the buildings to create hard and soft landscaping to improve the setting of the buildings.

In assessing the impact of the development on the character and appearance of the area Policy BE1 requires development proposals to meet the following criteria:

- Should not detract from the existing street scene and/or landscapes and should respect important views, skylines, landmarks and landscape features;
- Space around buildings should provide opportunities to create attractive setting with hard and soft landscaping.

The local area is characterised by a mix of uses and style of buildings. To the north, west and south are residential properties mainly comprising terraced house and flats. To the south the houses are separated from the site by an elevated railway line. To the east are playing fields and the buildings that comprise the David Lloyd Sports Centre. From Balmoral Avenue, the site is hoarded at present but provides a landscaped area that creates a break in the urban fabric of the street.

A Landscape and Visual Impact Assessment of the development has been undertaken by the applicant to consider the impact on residents and the wider community. The report follows an objective methodology to establish the landscape character of the site and the effect of the development on that character. The report also assesses the visual effect of the development on local residents and this will be discussed in the next section relating to impact on neighbour amenity.

The landscape character assessment is based on reports relating to arboriculture, ecology, archaeology, flood risk and soil. The site is designated Urban Open Space but is not subject to any national landscape or statutory designations. The assessment concludes that the landscape is defined as “medium value at a local level. Pleasant but ordinary landscapes with intrusive elements such as infrastructure, unattractive buildings and industrial areas. Poor vegetation structure and management. Typified by urban fringes.”

In terms of the impact of the development on the landscape the report concludes that whilst the proposal will cause change to the immediate character of the site, the impact will be very local and within the wider context of the urban townscape there will be very little change. The landscape effect has therefore been defined as neutral for the following reasons:

- The development will fit in with the scale, land, form and pattern of the landscape; and
- The development will maintain the existing landscape quality

The siting of the buildings to the rear of the site and the grouping of the proposed buildings with the existing massing of the buildings at David Lloyd Sports Centre reduces that impact of the proposed buildings on the street scene in Balmoral Avenue. The visual impact is further mitigated by the railway embankment and mature tree line to the south. The overall appearance of the site will remain as an open landscape and as such it is

considered that the proposed development would not have an adverse impact on the visual character and appearance of the area.

- External lighting, including floodlighting for pitches.

The Council's Environmental Health Officer has advised that the proposed use of low level bollards and bulkhead lights on the site is acceptable. However, the applicant does not appear to have finalised the detail of the floodlighting that they wish to provide for the MUGA and football pitch. They indicate that they wish to investigate the use of LED flooding luminaires at detailed design stage with a specialist contractor.

Concerns have been raised by residents about the impact of the floodlighting from the pitches on residential amenity. The acceptability of the MUGA and playing pitches is discussed above and no objection to the provision of these facilities is raised in principle.

It is proposed to use the MUGA until 21.00 on weekdays and until 16.00 on Saturday and Sunday for school and community use and this will require the use of floodlights. The Masterplan shows 6 x 12m lighting columns around the MUGA but with no detail of their height. The closest light column to a residential property will be approximately 80m from the rear elevation of properties in Upper Elmers End Road.

For the football pitch, it is proposed to use this for school use until 18.30 on weekdays only. The Masterplan shows 6 x 16m lighting columns around the site. The closest light column to a residential property will be approximately 25m from the rear elevation of properties in Mountbatten Close and 65m to No 45 Balmoral Avenue.

In addition, 4m high lighting columns will be provided to light the main access road.

The Council's Environmental Health Officer advises that the report still seems to expect a lighting scheme to be approved by Bromley at a later date, after they have looked at the feasibility of LED lighting. It appears, therefore, that the levels given in this report are no more than a guide and are levels which satisfy the various standards but are not derived from light distribution figures relevant to each luminaire. It is recommended that a condition be imposed requiring a lighting scheme to be approved by the Council.

At this outline stage, it is considered that the provision of floodlighting and lighting columns for the internal road access is acceptable in principle. However, this will be subject to a condition requiring the submission of an acceptable lighting scheme that provides a detailed assessment of the actual light fittings to be used on the site and their impact on residents. It is anticipated that an acceptable scheme could be put forward and this matter is considered acceptable in principle.

Residential Amenity

The relevant UDP policy relating to the impact of development on the amenity of the residents of adjoining residential properties is Policy BE1: Design of New Development, which requires development proposals to safeguard the residential amenities of the area by ensuring that their current living conditions of occupiers of neighbouring buildings are not harmed through noise and disturbance or by inadequate daylight, sunlight, privacy or overshadowing. In addition to the site coverage, height and massing, which are discussed elsewhere in this report, it is necessary to assess the impact of overlooking that may result in the loss of privacy, and noise and disturbance to fully understand the impact of the proposed development on the amenity of occupants of adjoining residential properties.

There is potential for the proposal to result in harm to residential amenity as a result of the siting of the building, intensification of the use of the site, the location of the new vehicular access points, car parking areas and internal access road and the use of sports pitches and outdoor facilities.

Turning first to the impact of the development on privacy from overlooking, the submitted Landscape and Visual Impact Assessment (LVIA) considers the impact of the development on visual amenity for residential properties around the site.

The report finds that there will be a clear view of the site in each instance and the effectiveness of existing screening, where this is in place, is discussed.

The findings of this part of the LDIA relating to sites where there is a substantial or substantial/moderate impact has been summarised elsewhere in this report. In each instance, the primary mitigation offered is in the form of tree and shrub planting to supplement existing boundary tree screening, using native and evergreen species to provide winter screening. In addition, the report recommends the use of sensitive colour and materials for the school buildings and the boundary and internal fencing. In terms of the impact of the floodlighting, this could be mitigated by limiting the hours of operation of the lights and the careful design of the light fittings to minimise upward and downward light spill and this is acceptable in principle as set out above.

Whilst the suggested tree screening will soften the visual impact of the development, in many instances it will not completely remove views of the buildings and pitches in the winter. However, it is considered that the visual impact of the development following implementation of the mitigation measures described above and the chance for planting to become established and mature, is not so harmful as to justify a reason for refusal of the development.

It should also be noted that there is a significant separation distance between the school buildings and the neighbouring dwellings and, as such, the buildings will not appear overbearing or dominant. Whilst there will clearly be a change in the outlook from some properties which currently look out across

open and undeveloped land, this does not present significant grounds in itself to warrant refusal of this application.

In terms of the impact of the development on privacy, the main source of overlooking will be from any upper floor windows located in the south western elevations of each wing of the proposed building. The properties most affected by this are in Upper Elmers End Road and Lloyd Way where the closest back to back distance between the school and rear elevation of these properties is approximately 84m and 54m respectively. In addition to tree planting along the boundary, the applicant has advised that measures to reduce the impact of overlooking through the careful design of the window openings could be accommodated at the detailed design stage of the Reserved Matter relating to the appearance of the building.

The south-east and north east elevations will overlook the David Lloyd Sports Centre and the Rugby Club pitches respectively which will not suffer adversely in this respect. The north-west elevation will face properties in Mountbatten Close and Balmoral Avenue but these are separated by a minimum distance of approximately 129m which is considered to be sufficient separation to minimise loss of privacy.

It is not considered likely that occupants of residential properties will suffer a loss of overlooking from the use of the pitches or car parking and internal access road. The majority of private gardens of properties overlooking the site are protected by fencing. The applicant is proposing additional 1.8m fencing around the whole site to provide additional protection for occupants of neighbouring residential properties. A condition requiring details of the fencing is recommended.

In addition, a Noise Assessment has been submitted which considers the impact of noise generated by the activities. As previously mentioned, the report considers the impact of noise sources on the operation of the school and concludes that, subject to the implementation of the mitigation measures in the report the impact on the operation of the school will not be detrimental.

The report also considers noise generation from the Multi Use Games Area (MUGA) as this will be operating at less sociable times in the evening. The report finds that the MUGA is set back from the site boundary by 60m which will offset potential noise emission to nearby residential receivers. In addition, local panelling or fencing around the pitch will be installed utilising resilient fixings in order to reduce the noise generated by ball impacts. In addition, the 1.8m acoustic quality barrier along the majority of the length of adjacent residential properties will help protect garden areas from potential noise from the MUGA and other external areas of the school.

It has not considered the impact of the use of the football pitch as this will only operate up to 18.30 in accordance with the terms of the application. It should be noted that the current use and site conditions could revert back to the original scale of use which appears to be unrestricted.

The Council's Environmental Health Officer has reviewed the submitted report and advises that the proposal is acceptable subject to complying with the recommendations of the Noise Assessment and a condition to secure this is recommended.

With regard to the noise generated by traffic generated from car parking and the access road to the main school buildings, the acoustic fence referred to above will be erected along the boundary of the site at Mountbatten Close and No 45 Balmoral Avenue and extended along almost the full length of the Rugby Club boundary. It is considered sufficient to lessen the impact on amenities the occupants of nearby residential properties.

In terms of assessing the impact the evening and weekend community use of the site, the school have indicated a range of uses that could be available to community groups and clubs but, at this stage, it is not possible to specify the actual level of use of the school out of hours. Therefore, a specific condition is recommended requiring a Community Use Agreement to be entered into setting out the scope of the proposed community use to include details of pricing policy, hours of use, access by non-educational establishment users, management responsibilities and a mechanism for review to enable a more detailed assessment of the impact on neighbours to be undertaken.

In summary, the use of the site for education purposes will generate additional activity from people and vehicles on the site and in the local area. The school proposes to operate an extended school day, which will help reduce conflict with the closest school at Marian Vian, and will consider staggering the arrival and departure times for sixth form pupils which would help diffuse activity levels. It is considered that the impact of the general school use of the outside areas at break times and as part of the curriculum and the evening and weekend community use can be mitigated by the additional tree planting and acoustic fencing to such a level that the amenities of residents are protected.

Trees and Landscaping

Policy NE7 of the Unitary Development Plan provides policy guidance for the consideration of the impact of development on trees.

This policy requires new development to take particular account of existing trees on the site which, in the interests of visual amenity and wildlife habitat, are considered desirable to retain. Tree Preservation Orders will be used to protect trees of environmental importance and visual amenity. Where trees have to be felled, the Council will seek suitable replanting. Policy NE8 seeks to improve the amenity and conservation value of trees and woodlands and the Council will encourage appropriate beneficial management, appropriate new planting in suitable locations and promote public interest in and enjoyment of trees and woodlands.

The applicant has submitted a Tree Survey report to accompany the application. This advises that a total of 92 trees and 4 hedgerows were surveyed. Out of the 92 trees, 22 individual trees and 3 hedgerows are to be

removed. Of the 22 trees, 2 Category C (defined as low quality and value) trees are assessed for removal and the other 20 trees and the hedges are Category U (defined as poor condition with limited lifespan). The survey also advises that there will be no incursions into the root protection area of the remaining trees resulting from the construction of the development and the spatial relationship between the proposed development and the retained trees is such that it is unlikely that there will be future pressure to remove additional trees.

The majority of trees on the site are located in 2 belts along the south western boundary to the rear of the residential properties in Upper Elmers End Road and along the south eastern boundary adjacent to the David Lloyd Sports Centre. Six trees will be removed from the south western boundary belt and 12 from the south eastern boundary belt. The remaining 4 trees will be removed from the southern boundary. The report advises that 20 of the 22 trees (all Category U) need to be removed on arboricultural grounds as they are dead and should be removed for safety purposes. Two category C trees adjacent to the railway boundary and 3 hedges close to the frontage of the site need to be removed to allow the development to proceed.

The trees along the southern boundary are on Network Rail land and are protected by a Tree Preservation Order.

The Council's Tree Officer raises no objection to the removal of the identified trees and the 3 hedges and advises that the measures set out in the Tree Protection Plan are adequate for the needs of the site. The survey shows the retention of the large deciduous hedge that is on the boundary with Mountbatten Close as this will provide some visual and acoustic screening for some of the residents at both ground and upper floor levels. It is recommended that any works are carried out under the supervision of an arboriculturalist and a suitable condition is recommended.

In terms of landscaping for the site, no details of a landscaping scheme have been submitted at this stage and the applicant has retained this element of the development as a Reserved Matter for future consideration. As discussed elsewhere in this report, the Landscape and Visual Impact Assessment makes recommendations about the use of landscaping to minimise the visual impact of the development on those residential properties that overlook the site. This includes additional tree planting (both coniferous and deciduous) along the south western boundary in particular and details of all landscaping will be sought at Reserved Matters stage.

Planning Contributions

Policy IMP1 (Planning Obligations) and the Council's Planning Obligations SPD states that the Council will, where appropriate, enter into legal agreements with developers, and seek the attainment of planning obligations in accordance with Government Guidance. A Section 106 (S106) Legal Agreement or Unilateral Undertaking is required. The draft Heads of Term would need to be agreed in principle and would need to include:

- £20,000 for future traffic management schemes
- The cost of other highway works as may be required including yellow line marking for Keep Clear signs
- Travel Plan
- Reimbursement of the Councils legal costs.

At the time of reporting no heads of terms or draft agreement has been received.

Other Technical Matters

- Ecology

In policy terms this report is assessed against Policy 7.19 of the London Plan which seeks a proactive approach to the protection, enhancement, promotion and management of biodiversity in support of the Mayor's Biodiversity Strategy.

The site has potential to support wildlife habitats and an Extended Phase 1 Habitat Survey and the subsequent Bat Activity Survey has been submitted to assess the current ecological value of the site. The report found no record of Great Crested Newts, dormouse, reptiles and badgers. There are no specially protected species of birds or breeding habitat recorded but the site does contain mature trees suitable for nesting birds. For bats the survey found that the site has moderate value for foraging and negligible potential for bat roosting and makes recommendations to retain suitable habitat for foraging and commuting bats.

In summary, due to the presence of mature trees and the railway embankment, the site is classified as having Moderate habitat, which is suitable for bats. The overall impact on the ecology is classified as of Slight magnitude which will be offset by biodiversity enhancement with landscaping including ecological areas, wild flower seed mix planting, native trees and shrubs and the provision of bat and bird boxes within the development design. A condition requiring details of site enhancements to implement the recommendations of the reports is recommended. In addition, the details of the Reserved Matter for landscaping should take account of the biodiversity recommendation of these reports as part of its submission.

- Sustainability and Energy

The London Plan provides the policy framework in respect of sustainable construction and renewable energy and, in particular, Chapter 5 of the London Plan (in particular policies 5.3 and 5.6) and the Supplementary Planning Guidance entitled Sustainable Design and Construction. In addition, Policy BE1(vi) of the UDO, regarding sustainable design, construction and renewable energy is also relevant.

The applicant has submitted an Energy Statement which sets out measures to meet London Plan policies 5.2: Minimising carbon dioxide emissions and Policy 7.7: Renewable Energy. The report sets out the Low Energy Demand carbon emission results shows a 15% carbon reduction can be achieved from energy efficiency measures relating to the performance of the building fabric and services specification and passive design measures.

The Energy Statement has considered options for renewable energy and concludes that the installation of Solar PV panels is the most appropriate renewable energy solution.

A total site carbon reduction from energy efficiency measures and PV panels equates to an overall 35% reduction.

The GLA in their Stage 1 response advise that the carbon dioxide emission savings exceed the target set within Policy 5.2 of the London Plan. However, the concerns in regard to heating and cooling strategy, provision of the BRUKL sheets including efficiency measures alone to support the savings claimed, future proofing and a single heating system, the total PV output in kWp, roof plan and the assumed efficiency of the panels should be clarified and addressed before compliance with London Plan energy policies can be verified.

To secure this, a condition is recommended requiring the submission of a site-wide energy strategy prior to the commencement of development.

- Flood Risk Assessment and Sustainable Urban Drainage Systems (SUDS)

The site lies within Flood Zone 1 with a triangle of land located along the western boundary in Flood Zone 2. The applicant submitted a Flood Risk Assessment and a Strategic Drainage Report with the original submission.

In terms of flood risk the Environment Agency finds that the revised Flood Risk Assessment and associated Exception Test Report uses the correct methodology for assessment of the impact of flood risk and climate change. The building will be located away from the Flood Zone 2 area which will accommodate the car park and part of the pitches. However, to protect the proposed building the finished floor levels should be set no lower than 37.66AOD or 150mm above the existing ground level.

The surface water strategy identifies initial measures to reduce run-off including permeable surfaces, green roofs and attenuation tanks. Surface water drainage rates will be retained at green field rates in line with guidance. The principle of the drainage strategy for the site is considered to fulfil SUDS requirements and is acceptable, in principle, and in line with agreed standards. A condition is recommended requiring a detailed surface water strategy to consider the detailed design details for all aspects of the submitted strategy.

In addition Sport England have requested a detailed assessment of ground conditions of the land proposed for the playing field and a detailed scheme to ensure that the pitches are provided to an acceptable quality.

- Contaminated Land

Prior to the commencement of development, the applicant is required to submit a Phase 1 Desk Study and Preliminary Risk Assessment and Ground Investigation Report to identify any concerns in respect of contaminants that would pose a potential risk to human health and remediation measures should adverse land conditions be found. This should address all aspects in accordance with the requirements of Policy ER7 of the UDP. A condition requiring the submission of this report is recommended.

- Air Quality Management Area (AQMA)

The site lies within the Bromley Air Quality Management Area and an Air Quality Assessment is required to determine the impact of the development on air quality in accordance with the requirements of the Policy 7.14 of the London Plan that new developments should be 'air quality neutral' and not lead to further deterioration of air quality as a result of the development.

The applicant has assessed the impact of the development on vehicle Emissions and the impact of construction of activities.

In terms of vehicle emissions, based on the predicted mean PM10 and NO2 concentrations are unlikely to be exceeded and the impact on playground facilities will be acceptable in terms of the likely short term effect

In terms of activity associated with construction activities, the impact of dust is considered to be a low to medium risk to local receptors. The impact of dust soiling and PM10 can be reduced to negligible through appropriate mitigation measures which are summarised in the report. With these measures in place the likelihood of dust episodes occurring at those receptors adjacent to the site are considered low.

The Council's Environmental Health Officer has assessed the submitted report and advises that there are no substantial objections to air quality in terms of the impact from vehicle emissions.

In terms of construction activities concerning vehicles, he recommends the submission of a Construction Logistics Plan and for the impact of dust he recommends a Dust Management Plan for any demolition works.

He notes that that no air quality assessment has been included for any potential impact from any proposed heating system and recommends a condition to secure this assessment.

- Archaeology

The relevant UDP policy in this respect is Policy BE16: Ancient Monuments and Archaeology which states that planning permission will not be granted for development that would adversely affect scheduled ancient monuments or other nationally important archaeological sites, involve significant alterations to them or harm their settings.

An Archaeological Desk-Based Assessment has been submitted by the applicant in support of the application. The assessment did not identify any designated heritage assets within or adjacent to the site but has identified previously unidentified, undesignated assets in the form of 15th – 19th century field boundaries and a small section of 19th century (and 18th) canalised watercourse, both of which are considered to be of local significance. The assessment has also identified low – medium potential for sub-surface archaeological remains of prehistoric date. The report recommends that development is preceded by a programme of archaeological evaluation to characterise the sub-surface archaeological resource and inform a final mitigation scheme. It is recommended that this is secured as a condition of planning.

Historic England (Archaeology) have advise that there is a limited archaeological interest on the site and HE(A) has recommended a condition to require a potential two-stage process of archaeological investigation and possible mitigation.

- Secured by Design

The proposal needs to incorporate Secured by Design principles (as required by Policy BE1 (vii)) and H7 (vii) to take account of crime prevention and community safety. Paragraphs 58 and 69 of the NPPF are relevant. Compliance with the guidance in Secured by Design and the adoption of these standards will help reduce the opportunity for crime, creating a safer, more secure and sustainable environment. A condition securing measures to minimise the risk of crime could be attached to any planning permission.

- Mayoral Community Infrastructure Levy

The development would be liable for the payment of Mayoral CIL. However, it is anticipated that the development will fall within the exemption category for Education and, as such, CIL will not be payable.

- Environmental Impact Assessment

As the site has an area of over 1ha it was necessary to “screen” an application as to whether it requires to be accompanied by an Environmental Assessment under the Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2015. The screening process identified that an EIA was not required for the proposed school and a formal opinion was issued on 27th May 2016 under ref 16/02014/EIA.

Conclusions

This proposal for a new school on the application site is contrary to the adopted Urban Open Space Policy G8 in the UDP and Policy 7.18 relating to Protecting Open Space in the London Plan. In addition, the site is not allocated for education use in the draft Local Plan.

Therefore, in order for permission to be recommended for this application, as well as the impacts of the development being considered satisfactory, it would be necessary to conclude that there are sufficient material planning considerations to permit the proposed secondary education school development. Relevant material planning considerations in this case include: government advice and policy, the Bromley Secondary Schools Development Plans (Jan 2105 and Jan 2016), and the education need identified in the draft Local Plan.

This report has set out the clearly identified need for the provision of secondary school places in the borough from 2017 for the draft Local Plan period. This is set out in the Secondary Schools Development Plan 2016 and in the Education policies of the emerging draft Local Plan. The site selection process undertaken by the Council could not find sufficient places by extending existing facilities alone so there is a need to provide these places in new schools.

Eden Park High School has come forward as a new secondary school through the Education Funding Agency and with ministerial approval having been granted for a school on this site.

Despite the lack of formal allocation, this proposal does represent a deliverable secondary school site to meet a clearly identified need and this matter has significant weight as a material planning consideration at the present time.

This must be balanced with the other material considerations to be taken into account as set out in the report above.

In respect of residential amenity, the report concludes that while there is an inevitable change to the area as a result of the introduction of a new school, the development is not considered unacceptable in terms of impact in this regard.

The additional traffic generation in the area arising from the school has been assessed in terms of the impact on the highway network and the impact of car parking by the Council and Transport for London. This report concludes that although the junction of South Eden Park Road and Croydon Road will be over capacity for one 15 minute period in the AM peak, this is not an unreasonable situation and does not warrant a refusal of the application on highway capacity grounds. In terms of car parking, measures to provide for staff parking and for pupils arriving at the school by car have been proposed.

These are considered to provide sufficient space to accommodate the predicted traffic flow in the local area.

In terms of the Layout and Scale of this Outline application, it is considered that the location of the school represents the least impact on neighbouring residents and sufficient information has been provided to conclude that the pitches, car parking, circulation space and other facilities can be adequately accommodated on the site without significant harm to visual amenity or the quality of the existing landscape. The layout also represents minimal disruption to significant trees around the site that provide important screening and visual amenity. It is also an option which it is considered will least harm the Urban Open Space at the site.

Other technical considerations are assessed including drainage and flood risk, ecology, air quality, archaeology, secure by design, sustainability and site-wide energy have been assessed and found to be sufficient to meet up to date UDP and London Plan policies in each respect.

Conditions for many aspects of the development are recommended to identify and secure mitigation measures and to ensure these measures are in place and can be effective.

Additional benefits will be the community use of the school which will include the use of the MUGA, the sports hall and a dedicated dance studio. The facilities will also help meet demand for indoor and outdoor training needs identified by local sports organisations.

The demonstrated local level of need that has been identified supports a general increase in the need for school places. At national level, paragraph 72 of the NPPF requires local authorities to note the “great weight” that the NPPF attaches to the need to create, expand or alter schools; and work with school promoters to identify and resolve key planning issues before application are submitted.

In reaching a conclusion for the recommendation on this application, careful consideration has been given the government’s policy statement from 2011, in particular: *“A refusal of any application for a state-funded school, or the imposition of conditions, will have to be clearly justified by the local planning authority. Given the strong policy support for improving state education, the Secretary of State will be minded to consider such a refusal or imposition of conditions to be unreasonable conduct, unless it is supported by clear and cogent evidence.”*

Careful consideration has been given to all the representations from the public and matters raised within these have been addressed in the considerations set out in this report.

With regard to all of the planning considerations set out in this report, it is considered that whilst the proposal is contrary to adopted Urban Open Space Policy, there are convincing and demonstrable material considerations that

indicate otherwise and that justify the grant of planning permission to facilitate secondary education provision. There are no other matters which are found to be unacceptable so as to warrant refusal of the application, and permission is recommended.

The application would need to be referred back to the Mayor of London if it is resolved that permission be granted, however this would not be required if it was resolved to refuse the application.

Background papers referred to during the production of this report comprise all correspondence on file ref: 92/02130/OUTMAJ, 16/03315/FULL1, 15/05521/FULL1, 16/04712/FULL1 and 16/03145/OUT excluding exempt information.

**RECOMMENDATION: PERMISSION BE GRANTED
SUBJECT TO PRIOR COMPLETION OF A SECTION 106 AGREEMENT
(relating to £20,000 for a future traffic management scheme if required, other highways works as may be required and a Travel Plan)
and REFERRAL TO THE MAYOR OF LONDON**

and subject to the following conditions

01: Details required pursuant to outline permission (see DI01)

- (i) Details relating to the
(a) landscaping, and
(b) appearance**

**shall be submitted to and approved by the Local Planning Authority
before any development is commenced.**

- (ii) Application for approval of the details referred to in paragraph (i) above
must be made not later than the expiration of three years beginning with the
date of this decision notice.**

- (iii) The development to which this permission relates must be begun not later
than the expiration of two years from the final approval of the details
referred to in paragraph (i) above, or in the case of approval on different
dates, the final approval of the last such matter to be approved.**

**Reason: No such details have been submitted and to comply with the
requirements of Section 92 of the Town and Country Planning Act 1990**

**02: The development hereby permitted shall only be carried out in complete
accordance with the details shown on the submitted plans and documents, as
follows:**

Plans:

- **Site Location Plan MAC-00-ZZ-DR – A 100 Rev P1**
- **Existing Site Sections MAC-00-ZZ-DR – A-400 Rev P1 received 01.07.2016**
- **Proposed Site Plan MAC-00-ZZ-DR- A-110 Rev P3 received 12.01.2017**

- Proposed Site Sections MAC-00-ZZ-DR-A-401 Rev P1 received 01.07.2016
- General Development Areas Plan wwa_1609_LL_103 Rev P00
- Illustrative Masterplan wwa_1609_LL_101 Rev P06 received 11.01.2017
- Landscape Sections wwa_1609_LSe_401 Rev P03 received 11.01.2017
- Topographical Survey & Underground Services Trace L7194/T/1-3 Rev 1 Sheet 1 of 3 received 05.07.2016
- Topographical Survey & Underground Services Survey L7194/T/2-3 Rev 1 Sheet 2 of 3 received 05.07.2016
- Topographical Survey & Underground Services Survey L7194/T/3-3 Rev 1 Sheet 3 of 3 received 05.07.2016
- Underground Drainage Layout MAC-XXXX-DR-P-003 Rev P2 received 09.12.2016

Documents:

- Extended Phase 1 Habitat Survey by Innovation Group dated June 2016
- Bat Activity Surveys RT-MME-122399 by Middlemarch Environmental dated October 2016
- Badger Inspection at Eden Park E2602161154 by Innovation Group dated 7th April 2016
- Tree Survey by Tree Craft Ltd dated June 2016
- Flood Risk Assessment by Resilience and Flood Risk Version 2.0 dated 8th November 2016
- Statement of Community Involvement by RONIN Marketing Ltd dated June 2016
- BREEAM Pre Assessment by Southfacing dated June 2016
- Noise Assessment by Cole Jarman dated June 2016
- Landscape and Visual Impact Assessment WWA_1609_Doc_601_P03 by Wynne-Williams Associates Ltd dated 11.01.2017
- Designers Response to Stage 1 Road Safety Audit by Sanderson Associates (Consulting Engineers) Ltd dated June 2016
- Transport Assessment by Sanderson Associates (Consulting Engineers) Ltd dated June 2016, Letter and Technical Note dated November 28th 2016 from Sanderson Consulting and Letter dated December 21st 2016 from Sanderson Consulting.
- Design and Access Statement by Mace dated June 2016
- Planning Statement by JLL by September 2016 Archaeological Desk-Based Assessment by AOC Archaeology Group dated December 2015
- Beckenham Academy, Permanent Site (Eden Park): Air Quality Assessment by gem Air Quality Ltd dated January 2016

Reason: For the avoidance of doubt and to ensure the satisfactory implementation of the development in accordance with Policy BE1 of the Bromley Unitary Development Plan

03: Details of the layout of the access roads, pedestrian access and turning area at its junctions with Balmoral Avenue, including a Road Safety Audit, and dimensions of visibility splays shall be submitted to and approved in writing by the Local Planning Authority and these access arrangements shall be substantially completed before any part of the development hereby permitted is first occupied. There shall be no obstruction to visibility in excess of 1 metre in height within the approved splays except for trees selected by the Authority,

and which shall be permanently retained. All recommendations of the Road Safety Audit must be fully adhered to

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

04: Before any part of the development hereby permitted is first occupied that part of a sight line of 4.2m x 2.4m x 43m which can be accommodated within the site shall be provided in both directions at the junction with Balmoral Avenue and with the exception of trees selected by the Local Planning Authority no obstruction to visibility shall exceed 1m in height in advance of this sight line, which shall be permanently retained as such.

Reason: In order to comply with Policy T18 of the Unitary Development Plan and to ensure that the proposal does not prejudice the free flow of traffic and conditions of general safety along the adjoining highway.

05: Before any part of the development hereby permitted is first occupied, bicycle parking (including covered storage facilities where appropriate) shall be provided at the site in accordance with details to be submitted to and approved in writing by the Local Planning Authority, and the bicycle parking/storage facilities 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.

06: The development permitted by this planning permission 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.

Reason: To reduce the impact of flooding both to and from the proposed development and third parties.

07: The development hereby permitted shall incorporate measures to minimise the risk of crime and to meet specific needs of the application site and the development. Details of those measures shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the development above ground level hereby permitted and implemented in accordance with the approved details. The security measures to be implemented in compliance with this condition shall achieve the Secured by Design accreditation awarded by the Metropolitan Police.

Reason: In the interest of security and crime prevention and to accord with Policy BE1 of the Unitary Development Plan

08: Details and sample boards of all external materials to be used for the development, including roof cladding, wall facing materials and cladding, windows and door frames, window glass, decorative features, rainwater goods and any parts of the site not covered by buildings, including roads, pathways,

communal areas, parking areas, pitches, MUGA where appropriate, shall be submitted to and approved in writing by the Local Planning Authority before any work is commenced. Such details shall include permeable materials throughout, measures to minimise surface water flooding. The development shall be carried out in accordance with the approved details.

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

09: (i) Details of fencing/barriers on the southern boundary, adjoining the railway, shall be submitted to and approved by the Local Planning Authority, in consultation with Network Rail, prior to the commencement of any part of the development. The approved fencing shall be erected prior to commencement of any part of the development and permanently maintained thereafter.

(ii) Notwithstanding the content of the report entitled Noise Assessment by Cole Jarman dated June 2016 and for all other external boundaries, details of fencing/barriers, including the specification and appearance of the acoustic fencing, shall be submitted to and approved by the Local Planning Authority prior to the first use of any of the facilities on any part of the site. The approved fencing shall be erected prior to commencement of any part of the development and permanently maintained thereafter.

iii) for all other areas and on any internal part of the site, including (but not exclusively) around pitches and to separate pedestrian and vehicle traffic, details of fencing/barriers/gates shall be submitted to and approved prior to the first use of any of the facilities on any part of the site. The approved fencing shall be erected prior to commencement of any part of the development and permanently maintained thereafter

Reason: In the interests of the visual appearance of the site and the amenities of the occupants of nearby residential properties and to accord with Policy BE1 of the Unitary Development Plan.

10: A) No development other than demolition to existing ground level shall take place until the applicant (or their heirs and successors in title) has secured the implementation of a programme of archaeological evaluation in respect of any anticipated geotechnical site investigation, in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the local planning authority in writing and a report on that evaluation has been submitted to and approved by the local planning authority in writing.

B) Under Part A, the applicant (or their heirs and successors in title) shall implement a programme of archaeological evaluation in accordance with a Written Scheme of Investigation.

C) No development other than demolition to existing ground level shall take place until the applicant (or their heirs and successors in title) has secured the implementation of a programme of archaeological mitigation in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the local planning authority in writing and a report on that evaluation has been submitted to and approved by the local planning authority in writing.

D) Under Part A, the applicant (or their heirs and successors in title) shall implement a programme of archaeological mitigation in accordance with a Written Scheme of Investigation.

E) The development shall not be occupied until the site investigation and post-investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under Parts (A and C), and the provision for analysis, publication and dissemination of the results and archive deposition has been secured.

Reason: Heritage assets of archaeological interest may survive on the site. The planning authority wishes to secure the provision of appropriate archaeological investigation, including the publication of results, in accordance with Section 12 of the NPPF.

11: Prior to commencement of construction on the site, the applicant will carry out an assessment of the effect on local air quality as a result of the heating system provided as part of the proposed development. The objective of the assessment will be to demonstrate that the design of the heating system is such that emissions of nitrogen dioxide shall not have a significant detrimental impact on existing air quality. The applicant will agree the scope of and approach to the Air Quality Assessment with the Head of Planning, in consultation with the Council's Environmental Health Officer. The development shall not be carried out otherwise than in accordance with the approved plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

Reason: In order to comply with Policy BE1 of the Unitary Development Plan and in the interest of the amenities of adjacent properties and the wider area.

12: No development shall commence on site, including demolition until such time as a Demolition and Construction Noise and Dust Management Plan has been submitted to and approved in writing by the Local Planning Authority. The Plan shall be implemented in accordance with the approved details and to the agreed timescale throughout the period of the works.

Reason: In order to comply with Policy BE1 of the Unitary Development Plan and in the interest of the amenities of adjacent properties and the wider area.

13: Prior to the commencement of the development, including demolition and removal of site material, hereby permitted a Construction Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan shall include measures of how construction traffic can access the site safely and how potential traffic conflicts can be minimised; the route construction traffic shall follow for arriving at and leaving the site, measures to secure provisions of on-site delivery, off-loading, turning and parking of construction and operatives vehicles and the hours of operation, location of wheelwash facility but shall not be limited to these. The Construction Management Plan shall be implemented in accordance with the agreed timescale and details.

Reason: In order to comply with Policies T5, T6, T7, T15, T16 and T18 of the Unitary Development Plan and in the interest of the amenities of the adjacent properties.

14: Before any work on site is commenced a site wide energy assessment and strategy for reducing carbon emissions shall be submitted and approved by the Local Planning Authority. The results of the strategy shall be incorporated into the final design of the buildings prior to first occupation. The strategy shall include measures to allow the development to achieve an agreed reduction in carbon dioxide emissions of at least 35% above the TER level required by the Building Regulations 2013. The development shall aim to achieve a reduction in carbon emissions of at least 20% from on-site renewable energy generation. The final design, including the energy generation shall be retained thereafter in operational working order, and shall include details of schemes to provide noise insulation and silencing for and filtration and purification to control odour, fumes and soot emissions of any equipment as appropriate.

Reason: In order to seek to achieve compliance with the Mayor of London's Energy Strategy and to comply with Policy 5.2 and 5.7 of the London Plan 2015.

15: Details of the proposed slab levels of the building(s) and the existing site levels shall be submitted to and approved in writing by the Local Planning Authority before work commences and the development shall be completed strictly in accordance with the approved levels.

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

16: No part of the development hereby permitted shall be commenced prior to a contaminated land assessment and associated remedial strategy, together with a timetable of works, being submitted to and approved in writing by the Local Planning Authority.

- a) The contaminated land assessment shall include a desk study to be submitted to the Local Planning Authority for approval in writing. The desk study shall detail the history of the sites uses and propose a site investigation strategy based on the relevant information discovered by the desk study. The strategy shall be approved in writing by the Local Planning Authority prior to investigations commencing on site.
- b) The site investigation, including relevant soil, soil gas, surface water and groundwater sampling shall be approved in writing by the Local Planning Authority.
- c) A site investigation report detailing all investigative works and sampling on site, together with the results of analysis, risk assessment to any receptors, a proposed remediation strategy and a quality assurance scheme regarding implementation of remedial works, and no remediation works shall commence on site prior to approval of these matters in writing by the Authority. The works shall be of such a nature so as to render harmless the identified contamination given the proposed end-use of the site and surrounding environment.
- d) The approved remediation works shall be carried out in full on site in accordance with the approved quality assurance scheme to demonstrate compliance with the proposed methodology and best practise guidance. If during any works contamination is encountered which has not previously been identified then the

- additional contamination shall be fully assessed and an appropriate remediation scheme submitted to the Authority for approval in writing by it or on its behalf.
- e) Upon completion of the works, a closure report shall be submitted to and approved in writing by the Authority. The closure report shall include details of the remediation works carried out, (including of waste materials removed from the site), the quality assurance certificates and details of post-remediation sampling.
 - f) The contaminated land assessment, site investigation (including report), remediation works and closure report shall all be carried out by contractor(s) approved in writing by the Local Planning Authority.

Reason: In order to comply with Policy ER7 of the Unitary Development Plan and to prevent harm to human health and pollution of the environment

17: No development shall commence until the following documents have been submitted to and approved in writing by the Local Planning Authority after consultation with Sport England:

- (i) A detailed assessment of ground conditions (including drainage and topography) of the land proposed for the playing field which identifies constraints which could affect playing field quality; and
- (ii) Based on the results of the assessment to be carried out pursuant to (i) above, a detailed scheme which ensures that the playing field will be provided to an acceptable quality. The scheme shall include a written specification of soils structure, proposed drainage, cultivation and other operations associated with grass and sports turf establishment and a programme of implementation.
- (iii) The approved scheme shall be carried out in full and in accordance with a timeframe agreed with the Local Planning Authority after consultation with Sport England. The land shall thereafter be maintained in accordance with the scheme and made available for playing field use in accordance with the scheme.

Reason: To ensure the provision of quality playing fields

18: Details of all aspects of the external lighting, including technical details, impact on nearby residential properties and mitigation measures, shall be submitted to and approved by the LPA prior to the commencement of development and the development shall be carried out in accordance with the approved scheme and permanently retained thereafter

Reason: To protect the amenity of occupants of nearby residential properties in accordance with Policy BE1 of the Unitary Development Plan

19: With the exception of the details of the acoustic boundary fencing, the recommendations of the Cole Jarman report (Report 15/0467/R2 June 2016) shall be implemented in full prior to the use commencing and permanently maintained thereafter.

Reason: In the interest of protecting neighbouring residential amenity in line with policy BE1 of the Unitary Development Plan.

20: The development permitted shall be carried out in accordance with the Flood Risk Assessment (FRA) titled 'Eden Park Secondary School, Balmoral Avenue, Beckenham Floor Risk Assessment, Version 2.0' dated 8 November 2016 and the following mitigation measures detailed within the FRA: Finished floor levels will be site no lower than 37.66m AOD or 150mm above the existing ground level, whichever is greater.

Reason: To accord with Policy 5.12 of the London Plan and to reduce the risk of flooding to the proposed development and future occupants.

21: Details of measures to implement the recommendations of the Phase 1 Extended Habitat Report and the Bat Survey Report shall be submitted to and approved by the local planning authority and implemented prior to the first use of the development. The development shall be carried out in accordance with the approved details and permanently retained thereafter.

Reason: To comply with Policy NE3 of the Unitary Development Plan in order to safeguard and improve the provision for biodiversity on the site.

22: No part of the approved use of the site shall commence until a community use agreement, prepared in consultation with Sport England, has been submitted to and approved in writing by the Local Planning Authority, and a copy of the completed approved agreement has been provided to the Local Planning Authority. The agreement shall apply to the outdoor sports pitches; MUGA and sports hall and include details of pricing policy, hours of use, access by non-educational establishment users, management responsibilities and a mechanism for review. The development shall not be used at any time other than in strict compliance with the approved agreement.

Reason: To secure well managed safe community access to the sports facility/facilities, to consider the impact on amenity of local residents, to ensure sufficient benefit to the development of sport and to accord with Development Plan Policy.

23: Details of a scheme for the management of the car park shall be submitted to and approved in writing by the Local Planning Authority before any part of the development is first occupied and the car park shall be operated in accordance with the approved scheme at all times unless previously agreed in writing by the Authority. The content to be included in the Car Park Management Plan shall be agreed with the Local Planning Authority prior to submission of the draft Plan.

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

24: Before commencement of the use of the land or building hereby permitted car parking spaces and internal turning space shall be completed in accordance with the approved details and thereafter shall be kept available for such use and all spaces shall be 4.8m by 2.4m with a 6m rear clearance for each space with the exception of disabled spaces. 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 indicated or in such a position as to preclude vehicular access to the said land.

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.

25: Details of electric vehicle charging points in accordance with the requirements of the London Plan shall be submitted and approved by the Local Planning Authority and implemented prior to the first use of the development and shall be permanently retained thereafter.

Reason: To minimise the effect of the development on local air quality in line with NPPF p124 and Policies 6.13 and 7.14 of the London Plan

26: The Sports Hall shall be erected in accordance with the footprint of the building shown on plan 110 Rev P3, in consultation with Sport England, and fitted out in accordance with the Sport England's Technical Design Guidance Notes: Developing the Right Sports Hall.

Reason: To ensure the development is fit for purpose and sustainable and to accord with Development Plan Policy

27: The Multi Use Games Area hereby permitted shall not be constructed other than substantially in accordance with Sport England's Technical Design Guidance Notes: Artificial Surfaces for Outdoor Sport (Updated guidance for 2013)

Reason: To ensure the development is fit for purpose and sustainable and to accord with Development Plan Policy

28: Details of EVCP to be provided in accordance with the requirements of the London Plan shall be submitted and approved by the Local Planning Authority and implemented prior to the first use of the site for education purposes and retained.

Reason: To accord with Policy 6.13 of the London Plan and in the interests of improving air quality.

29: The community use of the Sports Hall, dance studio and the Multi Use Games Area only shall not commence

- before 18.00 and the site shall be cleared of all users no later than 21.30pm on weekdays and
- before 09.00 and the site shall be cleared of all users no later than 16.30 on Saturdays and Sundays.

There shall be no community use of the football pitch, the training pitches and summer sports layout without the prior approval of the Local Planning Authority.

Reason: In the interests of the amenities of the occupants of nearby residential properties and the highway network to accord with the provision of Policy BE1 and T18 of the Unitary Development Plan.

30: The floodlighting for the Multi Use Games Area hereby approved shall not operate after 21.00 on weekdays or 16.00 on Saturday or Sunday. The floodlighting for the Football pitch shall not operate after 18.30 on weekdays and shall only be available for Eden Park High School related activities. Reason: In the interests of the amenities of the occupants of nearby residential properties and to accord with the provision of Policy BE 1 of the Unitary Development Plan

31: The development shall be implemented in accordance with the Tree Survey and Tree Protection Plan approved as part of the planning application, under the supervision of a retained arboricultural specialist in order to ensure that the correct materials and techniques are employed.

Reason: To ensure that works are carried out according to good arboricultural practice and in the interests of the health and amenity of the trees to be retained around the perimeter of the site and to comply with Policy NE7 of the Unitary Development Plan.

32: None of the trees shown for retention shall be removed, felled, lopped or topped within a period of five years from the date of this permission without the prior approval of the Local Planning Authority. Any trees or plants which within a period of five years from the substantial completion of the development die, are removed or become seriously damaged or diseased shall be replaced within the next planting season with others of similar size and species to those originally planted.

Reason: In order to comply with Policy BE1 of the Unitary Development Plan and to secure a visually satisfactory setting for the development.

33: Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (or any Order amending, revoking and re-enacting this Order) no buildings or extensions shall be constructed within the school site hereby permitted without the prior approval in writing of the Local Planning Authority.

Reason: In order to prevent intensification of the site and to comply with Policy BE1 of the Unitary Development Plan and in the interest of amenity and public safety.

Informatives:

01: You are advised that this application may be liable for the payment of the Mayoral Community Infrastructure Levy under the Community Infrastructure Levy Regulations (2010) and the Planning Act 2008. The London Borough of Bromley is the Collecting Authority for the Mayor and this Levy is payable on the commencement of development (defined in Part 2, para 7 of the Community Infrastructure Levy Regulations (2010)). It is the responsibility of the owner and/or person(s) who have a material interest in the relevant land to pay the Levy (defined in Part2, para 4(2) of the Community Infrastructure Levy Regulations (2010)

If you fail to follow the payment procedure, the collecting authority may impose surcharges on this liability, take enforcement action, serve a stop notice to prohibit further development on this site and/or take action to recover the debt.

Further information about the Levy can be found on the attached information note and the Bromley website www.bromley.gov.uk/CIL.

02: You should consult Street Naming and Numbering/Address Management at the Civic Centre on 020 8313 4742, email address.management@bromley.gov.uk regarding Street Naming and Numbering.

03: We would recommend floor resilience measures to be incorporated within the development to minimise the impact of flooding to the development. The EA fully support the inclusion of flood resilience techniques. Information on flood resilience can be found on the following link http://www.planningportal.gov.uk/uploads/br/flood_performance.pdf

04: The EA would recommend that occupant register with the Environment Agency's flood warning service, Floodline, so that they may prepare themselves in case of a flood event. This can be done by calling 0345 988 1188 to register.

05: Written schemes of investigation will need to be prepared and implemented by a suitably qualified archaeological practice in accordance with Historic England Greater London Archaeology guidelines. They must be approved by the planning authority before any on-site development related activity occurs.

06: You should contact extension 4621 (020 8313 4621 direct line) at the Environmental Services Department at the Civic Centre with regard to the laying out of the crossover(s) and/or reinstatement of the existing crossover(s) as footway. A fee is payable for the estimate for the work which is refundable when the crossover (or other work) is carried out. A form to apply for an estimate for the work can be obtained by telephoning the Highways Customer Services Desk on the above number. Any repositioning, alteration and/or adjustment to street furniture or Statutory Undertaker's apparatus, considered necessary and practical to help with the forming/modification of vehicular crossover hereby permitted, shall be undertaken at the cost of the applicant.

07: 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. In respect of surface water it is recommended that 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

08: Thames Water recommends that all petrol/oil interceptor be fitted to 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. Thames Water aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9litres/minute at the point where it leaves Thames Water pipes. The developer shall take account of this minimum pressure aim the design of the proposed development.

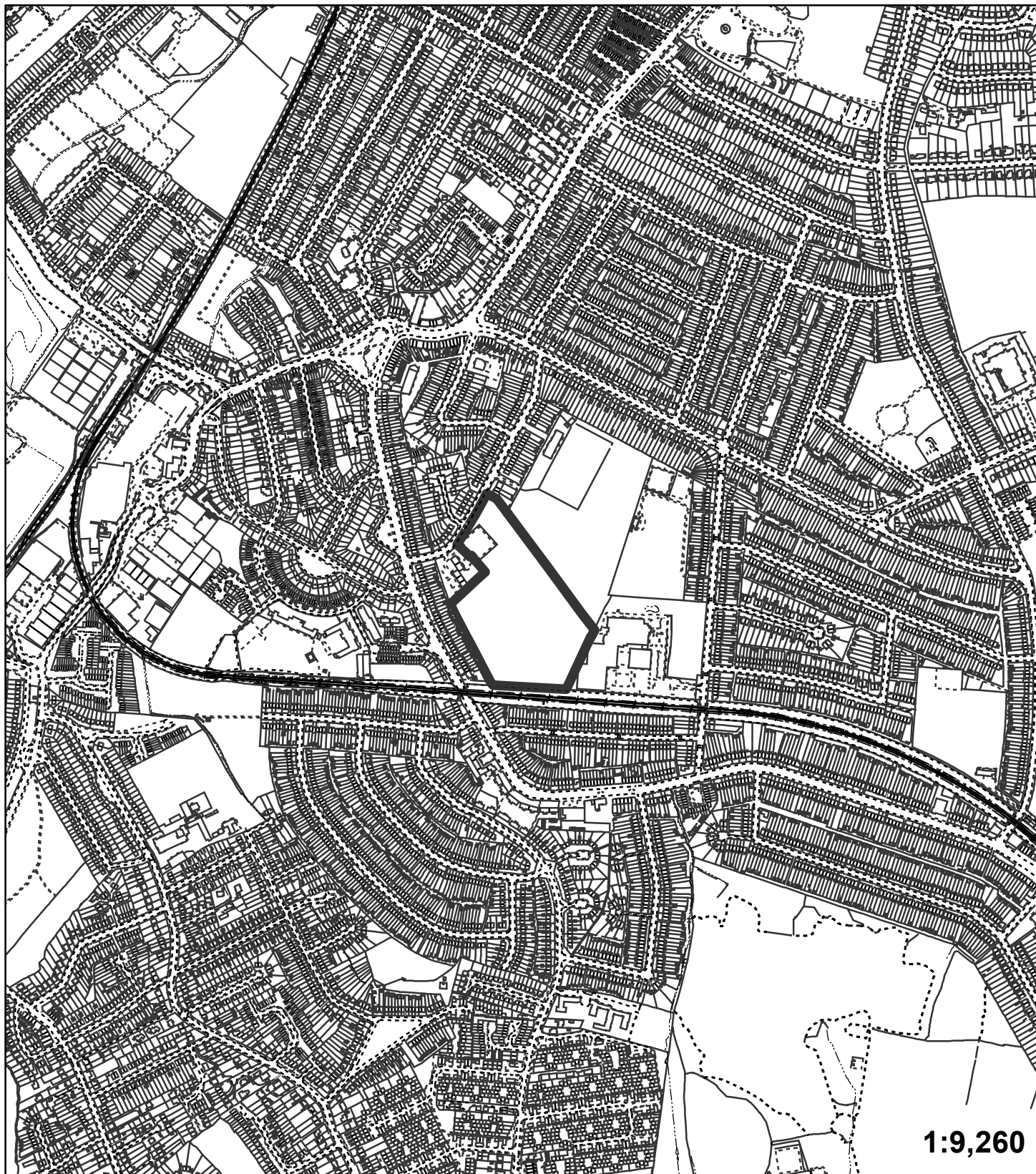
09: There is a Thames Water 8" cast iron distribution main crossing the development site directly adjacent to Balmoral Avenue. The main must be located and protected during construction. Unrestricted access must be available at all times for maintenance and repair. Please contact Thames Water Developer Services, Contact Centre on 0800 009 3921 for further information.

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Application:16/03145/OUT

Address: South Suburban Co Op Society Balmoral Avenue Beckenham
BR3 3RD

Proposal: Outline application for the erection of 2 buildings of two to three storeys comprising 13,508 square metres (Gross External Area) of Class D1 floorspace to provide an 8 form entry plus 6th form school (up to 1,680 pupils) and sports hall, 17,200 square metres for playing fields, 2,190



"This plan is provided to identify the location of the site and should not be used to identify the extent of the application site"

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Application No : 16/03315/FULL1

Ward:
Bickley

Address : St Hughes Playing Fields
Bickley Road
Bickley
Bromley

OS Grid Ref: E: 541958 N: 169210

Applicant : Kier Construction (Southern)

Objections : YES

Description of Development:

Proposed erection of a 6FE Secondary Boys School comprising a part 2 storey, part 3 storey school building of 8,443m² including a sports hall (also for wider community use) together with hard and soft landscaping, creation of a new vehicular access on Chislehurst Road, 68 parking spaces, drop off/pick up area and associated works. Erection of a temporary 2 storey classroom block on site for 12 months to accommodate 5 classrooms, a laboratory, offices and toilets.

Key designations

Biggin Hill Safeguarding Area
London City Airport Safeguarding
Smoke Control SCA 10
Urban Open Space

Proposal

Full planning permission is sought for a new 6 Form Entry (FE) boys secondary school on the 4.69ha site, to accommodate up to 900 pupils with 64 full time equivalent staff. The age of boys is to be 11-16 and no sixth form entry is being proposed. The development is proposed to comprise the following elements:

Building and Works

- New split level school building of up to 3 storeys in height of 6770sqm
- Building will comprise main hall, dining hall, library, internal atrium, 39 teaching spaces and associated facilities
- Two storey Sports Hall including an activity studio which will also be available for community use (18m x 133m)
- Single entrance to building from Chislehurst Road
- Modern elevational treatment - grey brick to ground floor and some parts of the elevations of the building and a cladding system to the upper elevations in a mix of green, blue and grey panels, used

- horizontally and vertically
- PV panels to the roof
- Hard surfaced outdoor play areas around school building
- 2 hardstanding enclosed ball/games courts adjacent to school building
- Demolition of existing Pavilion and Cadet's Hut
- Relocation of Air Force Cadets to girls' school site during construction and use of school building once completed
- Retention of the majority of the existing playing fields and trees on the site
- Sports pitches to include 2 full sized pitches including a rugby union pitch, use for Football u13, Hockey and Lacrosse, in addition a 8 lane 100m running track and long jump pitch retained
- Separate bin store/delivery bay off Chislehurst Road including turning head
- Substation adjacent to Chislehurst Road

Access arrangements

- New primary vehicular and separate pedestrian access off Chislehurst Road with gates and welded mesh fencing
- New pedestrian access off Bickley Road
- One-way system through site with the ability to stack up to 50 cars on site
- Access and car parking with dedicated drop off area for 10 cars
- Reuse of existing vehicular exit off Bickley Road
- Main car park next to entrance for 11 visitor spaces inc. 5 DDA spaces
- Staff car parking area for 58 spaces also to be used for water attenuation
- Overflow car parking on games courts for events of up to 79 spaces (30/49 split between separate areas/courts)
- 36 cycle storage spaces in two locations and potential for a further 120 spaces if required.
- Construction access route from Chislehurst Road

Temporary development

A two-storey temporary mobile classroom building is also proposed and is to be sited close to Bickley Road which was originally due to commence a Year 7 intake in September 2017. It is expected that this structure will be in place for a one year period. This element includes:

- Two storey grey prefabricated temporary building 31m x10m
- Height of temporary building will be approximately 7m
- Comprising 5 classrooms, science laboratory, offices and toilets
- To accommodate 180 pupils and associated staff
- Proposed for a one year period and removed after completion of the main school building
- Provision of security fencing and temporary access gates
- Sited on proposed permanent staff car parking area

- Permanent parking area, upgrading of access drive, turning area and new pedestrian access to be implemented as part of the temporary accommodation
- Vehicular access from Bickley Road to be used for access and egress during school collection/drop-off hours
- Parking for staff and visitors - 9 spaces and a drop off area for 10 spaces including turning space
- Use of remaining hard surfaced area for outdoor play
- Use of existing playing fields throughout

Additional information was submitted in November 2016 to clarify and provide additional information in respect of a number of aspects.

Application Submission

The applicant has submitted the following documents to support the application:

Planning Statement: The statement sets out the overall policy background and identifies the planning considerations relevant to the application. It sets out the application and its background, the proposal being set out and the educational need for the school. It identifies the key planning considerations and concludes that the proposed development is sustainable and that all relevant material considerations have been addressed.

Additional Submissions Statement: This is an additional statement following the submission of revised information and clarification. It clarifies the need for the school and sets out the site selection consideration, playing fields and open space, community use, design and layout, access and highways issues, energy and sustainability and noise. It concludes that the revised and additional information adequately address the issues raised by the GLA and demonstrates that the scheme is appropriate in planning terms.

Alternative Site Selection Report: An additional report submitted to identify potential available sites for a school within a 5 mile radius. This identifies a wide number of potential sites and each have been considered in terms of their suitability. This includes residential sites, employment sites and sites within the MOL and GB. No sites have been identified as preferably more suitable for the construction of a new school.

Design and Access Statement: This document covers a wide range of aspects in relation to the proposed design and access arrangements to the building and site. It addresses the background, site analysis, proposed development including an assessment of the visual impact of the proposal and impact on the street scene, building and site access and circulation, appearance, landscaping and materials in all respects. The detailed aspects of the temporary accommodation are outlined and discussed and also the sports pitches and their provision.

Addendum: This document has been submitted to address comments received from local residents, the LPA, GLA, Sports England and other representations and consultees. It addresses in more detail the site viability, building positioning, building aesthetics, London Plan considerations (in particular sustainability measures) and access and transport options including alternative site entrance/exit options. It concludes that these aspects have been fully considered and the proposed scheme results in the best option for a school and its layout on the site.

Community Use Statement: An additional statement outlining the proposed community use of the resulting school building and site. It is expected the site will be available for sports, educational, health and community groups. However it is not anticipated that the site will be available for weddings or parties etc. The site is already used for football coaching, primary school events, the Local Astrological Society and running group practice. It is also used by the Air Training Cadets and Bickley Park Forest School and it is intended that these uses will continue.

After hours uses could include use of the school field (daylight hours only), Sports Hall, Dining Hall and Main Hall, Activity studio, Drama studio and classrooms. It is expected to be available to various community groups, activity programmes and adult education classes. Hours of use will be 17.00 – 21.30 Monday-Thursday and 09.00-12.30 on Saturdays except holidays and between 09.00-16.00 during the week in school holidays. These will be strictly controlled and a member of staff will be on-site at all times during a letting. Numbers on site will be limited to the vehicles which can be accommodated on site.

Statement of Community Involvement: Consultation was undertaken with the Borough Council, local residents and local Ward Councillors. A Public Consultation Event was held at Bullers Wood School for Girls on 29th June 2016. Prior to the event a poster was displayed at the site and advertised on the school website, 700 leaflets were also distributed and copies sent to the Ward Councillors. 198 people attended the event and 125 completed a feedback form. Further meetings have been held with local residents and local councillors. Similar concerns were raised to those submitted formally in respect of the application.

Transport Statement:

This has been amended and updated since submission. A detailed Transport Statement has been submitted which includes existing, proposed and predicted traffic flow data and counts, a Stage 1 Road Safety Audit, Parking Stress survey, traffic queue length surveys and traffic light timings. It identifies all aspects of the traffic implications of the proposals including vehicular and pedestrian routes and proposals, layouts, parking plans, swept path analysis, public transport availability and measures to minimise the need for the cars and encourage sustainable measures to encourage walking and public transport to the site for pupils and staff. It identifies that the school opening hours will be 7.45 – 14.15 with compulsory enrichment/homework sessions until 15.20 to minimise additional traffic at peak times. Alternative access arrangements and options have also been considered.

It concludes that a number of access options have been explored in the design process and explains that the chosen solution with a new access and entrance only from Chislehurst Road and exit only from the existing Bickley Road access was found to have the least environmental impact, be most technically sound, allow for traffic to be shared across both roads and is the preferred option from a highway engineering and safety perspective given the nearby junctions. Dedicated pedestrian access routes minimise conflict and provide access to public transport connections which will include a puffin crossing. A total of 69 car parking spaces are proposed, 36 cycle spaces, 10 vehicle drop off/pick up area and capacity for 50 cars on the site access road. All access points into the site can accommodate the appropriate size of vehicle, including service vehicles which can all turn on site. Therefore all vehicles can be accommodated on site and there is no need for parking on public highways.

Proposed traffic levels have been identified and sourced from staff and pupil levels and modal splits at the Girls School and it is estimated that 235 additional trips in the AM peak hour and 40 in the PM peak hour are proposed when taking into account measures in the Travel Plan. Whilst the junction modelling shows that 3 local junctions exceed their theoretical capacity in future year scenarios, the impact of the development traffic is minimal when compared to the base traffic flows and is not considered to be severe in accordance with paragraph 32 of the NPPF. Additional 152 rail trips, 218 bus trips are identified and there is capacity to accommodate these additional trips. The temporary accommodation will be served by 9 parking spaces, a 10 space drop –off/pick-up area, turning area and the use of Bickley Road for access and exit purposes during the use of the temporary accommodation. This part of the site will be fenced off from the construction site.

Highway safety implications have been considered and personal injury accidents are at a normal level for an urban location. Road safety concerns are not expected to be exacerbated by the proposed development. There is therefore no significant impact in transport terms and the Travel Plan identifies the commitment to minimise trips and maximise sustainable modes of travel.

Draft Travel Plan: The plan aims to minimise the impacts of the school on the surrounding environment with regard to vehicle trips and congestion. The objectives include the increased use of public transport and walking by both pupils and staff. The report sets out to reduce car travel by 10%, a minimum 10% increase in pupils travelling by sustainable modes and a minimum 20% reduction in staff using single occupancy travel. It identifies walking, cycling and public transport initiatives and measures to reduce staff travelling by car. The report is based on the travel patterns at the girls' school nearby and is initially set out for a 5 year period. The report is an ongoing strategy to encourage sustainable travel and will be regularly monitored with surveys every 6 weeks. The plan will be managed by the school with a travel plan co-ordinator appointed and a steering group set up to include members of the community.

Construction Traffic Management Plan: The plan outlines the management practices to be implemented throughout the period of construction works. It is expected the final Construction Management Plan (CMP) would be controlled through a condition. The CMP identifies the order of works with the first works providing a new access from Chislehurst Road, hardstanding for car parking and access and the temporary mobile school classrooms. The construction vehicles are to access the site from Chislehurst Road with turning and delivery provided on site. 67 car parking spaces for construction workers are to be provided on site. It identified that construction work is expected for a period of 18-24 months and indicative numbers for construction vehicles are provided. It is proposed to set up a Transport Steering group and a Transport Coordinator and the site will be controlled by a Banksman and Booking system for deliveries. Further details are to be discussed before works commence and include measures to minimise noise, vibration and dust from the site.

Arboricultural Report: The site is covered by a Tree Preservation Order and still shows signs of its past use, mainly by the trees present as the size and species show that they were landscape features of the manor house which used to be located on the site. This includes an avenue of pollarded Lime trees and established tree groups. A total of 90 individual trees, 16 groups and 1 woodland are the subject of the report which has been undertaken in accordance with BS 5837:2012. 15 individual trees have been categorised as 'A' grade trees of high quality and value, 54 individual trees, 8 groups and 1 woodland have been categorised as 'B' grade of moderate quality and value. 21 individual trees and 8 groups have been categorised as 'C' grade trees of low quality and value. C grade trees should not pose a constraint to development.

Arboricultural Impact Assessment: 5 B grade trees, a section of 1B grade group, a section of 1 B grade woodland, 5 C grade trees and 1C grade group will be removed to facilitate development and the impact to amenity should be minimal. Root protection zones (RPZ) have been identified and a preliminary tree protection plan has been produced. A final Tree Protection Plan and Arboricultural Method Statement will be required by condition in order to protect and retain the trees on site. Any works within a RPZ which includes the existing access road, new footpaths should be conducted using a minimal dig methodology and use cellular webbing.

Preliminary Ecological Appraisal: An appraisal was undertaken to determine the ecological value of the site, its habitats and if there are any protected species on the site. The site is dominated by amenity grassland, with areas of dense scrub habitat, mature tree lines, broad-leaved woodland, hardstanding and non-native boundary hedgerow. The pavilion building and ten onsite trees have potential to support roosting bats. Small areas of vegetation suitable for reptiles will be removed to facilitate development. Four invasive species are present on site. The appraisal concludes that further bat surveys are required. The small area of suitable reptile habitat that will be lost must be cleared under ecological supervision during April to September; any other vegetation clearance should be undertaken during October to February and will need to be preceded by a bird nesting check. Site enhancement measures include the establishment of a new hedgerow section on the

northern boundary, establishment of rough grass margins and the inclusion of nest bricks within the new building for house sparrow and starling. Other precautionary measures are advised during construction stages.

Bat Report: The survey results observed no bats emerging from the potential bat roosting features and it is unlikely that bats are roosting within the pavilion, a license will not be required for its demolition but ridge tiles should be removed under supervision. Bats are using the site and to ensure the grounds remain suitable for bat foraging and roosting, external lighting shall be minimised wherever possible, especially in the vicinity of boundary vegetation and trees that support features suitable for roosting bats. The lighting scheme will use warm white LED lighting which shall be directed to ground and light spill minimised. Further tree surveys will be required if illumination of any trees and used to inform mitigation and licensing requirements. Enhancement measures should include bat boxes affixed to boundary trees in dark areas. Further tree surveys, if required can be controlled through a condition.

Archaeological Desk-Based Assessment: The assessment did not identify any currently known significant archaeological remains, although there is potential for buried archaeological remains to be present, particularly associated with the Widmore estate within the northern part of the site. It is recommended a geophysical survey should be undertaken as a first phase of a staged scheme of evaluation. The results can be used to determine the best location for the proposed works and service trenches and if further works are appropriate. Several tree-lines and wooded areas have been identified within the boundaries of the proposed development area as qualifying as 'historically important' under the terms of the 1997 Hedgerows Regulations. It is recommended that any changes to these assets be avoided or minimised.

Written Scheme of Investigation: This outlines a scheme of evaluation to provide a programme and methodology for undertaking the works, the standards to be attained and the procedures for analysis and reporting. There is relatively low archaeological potential for the area prior to the post-medieval period. Evidence suggests the possibility that much of the footprint of the proposed development area may have been quarried in the early nineteenth century. This evaluation comprises fairly limited trenching on site to determine the presence or not of any quarries. The second phase would examine areas shown not to have been quarried.

Flood Risk Assessment: Assessment of flood risk and options for surface water drainage. The site is within Flood Zone 1 and therefore is considered to have a low risk from fluvial flooding. Infiltration drainage will be suitable for this site and porous paving within the proposed southern car park area is proposed. This will have the capacity to receive all runoff from the development. Connection to existing foul drainage is proposed.

Phase 1 Desk Study and Preliminary Risk Assessment & Phase 2 Ground Investigation Report: The preliminary risk assessment and site walkover identified a number of potential contaminant sources and pathways to potential receptors. Therefore it was advised that an intrusive ground

investigation to determine the extent of any potential contamination within any groundwater and soil strata was required. A number of exploratory holes were positioned across the site and samples exhibited levels of hydrocarbon contaminants above screening values and a pathway exists to potential receptors. It is therefore considered that a risk to human health is present and further investigation and remedial measures are required. The level of made ground on the site results in a recommendation that a suspended ground floor slab is adopted.

Air Quality Assessment: The proposed development lies outside the Air Quality Management Area (AQMA). This assessment is to determine the impact of emissions from road traffic on sensitive receptors. Additional car journeys generated by the development have been considered and will not have a significant impact on local pollutant concentrations. The assessment is in relation to the exposure of occupants of the new development rather than the impact of development.

Predicted concentrations have been compared with air quality objectives and indicate the annual mean NO₂ concentrations are below the objective in the worst case scenario. Concentrations of PM₁₀ are predicted to be within the annual mean objective in 2019. It is encouraged to extend the distance between the school buildings and outdoor play areas with the A222 road source to reduce exposure of children and school users to elevated pollutant levels.

Additional information: This includes the addition of an air quality monitor on the northern boundary before and during construction to log data electronically to allow this information to be monitored.

Acoustic Strategy Report: It details that a daytime noise survey was undertaken on the site to assess the acoustic performance specifications for glazing and façade construction and to assess the proposed ventilation strategy. The site is in a residential area but is affected by road traffic noise especially along Chislehurst Road and Bickley Road. Due to the background noise levels there will no requirement for enhanced acoustic glazing on the main school building; noise levels are expected to be limited to levels which are compliant to known standards when the proposed ventilation strategy of openable windows is implemented. The sports hall will have natural ventilation methods such as louvered openings and wind catchers and will require minimal attenuation. The noise levels will comply with relevant standards and the impact of noise from the car park and usage of the external areas is expected to be minor adverse in the short term, reducing to negligible in the long term.

Environmental Report: The energy strategy includes energy efficiency measures to minimise the carbon footprint and these measures alone show an improvement to Approved Document (2013) rates of 7%. Further improvements are not feasible within the scope of this development. The strategy has considered the feasibility of a wide range of low and zero technologies. The introduction of PVs is proposed and has the potential to reduce the buildings carbon footprint to a total of 21% below the 2013

requirements. The building has been assessed against the summertime overheating requirements and a combination of increased ventilation rates in summer, night cooling with exposed thermal mass and openable windows all occupied rooms comply with the requirements.

District Heating Strategy: The report outlines strategy for utilising district heating to supply heat to the proposed development and how the strategy meets the requirements of the London Plan. The heating system, its technical design and ground works are proposed to enable future connection to a district heating system if one becomes available.

Summertime Overheating Report: The report details the summertime overheating performance of the proposed development. The building has been designed with openable windows and extensive use of night cooling and solar control glass to reduce summertime temperatures. An evaluation of lifetime weather predications has also been established and mechanical ventilation may be required in the future to some rooms. The report identifies its compliance with London Plan policies and criteria.

Ventilation Statement: The report details what mechanical ventilation provision is proposed to serve the school, including preliminary sizes and locations for all fans and ventilation units and the approach to odour control and noise from ventilation plant. It is proposed that provision of attenuators, acoustic rated casing and silencers, and all plant to run at night 4dB lower than daytime limit will be incorporated into the installation of any external ventilation plant.

External Lighting Statement: The report details the external lighting provision proposed to illuminate the school site, which includes pedestrian walkways, roadways and car parks. Details of the type of lighting and its location on site are submitted. Roads will be illuminated by LED bollard lighting which limits overspill, car parks with 3m LED column lights and pedestrian pathways by bulkhead lights or low level bollard lighting. These will all be controlled via a photo cell to turn the lights on at dusk and turn them off at dawn, all lighting will be turned off at 22.00 until 07.00.

Location

The site is situated off Bickley Road in Bickley, Bromley. The site is designated as Urban Open Space in the Bromley Unitary Development Plan, and currently forms the playing fields and partial sports provision for the existing Bullers Wood Girls School to the north east of the site. The boundary of the adjacent Conservation Area extends along Pines Road to the east. The site sits on a slope with the northern part of the site being 2-3m higher than the southern part.

The site forms an almost triangular parcel of land with Bickley Road, Chislehurst Road and Pines Road bordering the site. To the western boundary of the site is a commercial car dealership garage. To the south eastern corner are a number of large detached dwellings and their respective garden areas which back immediately onto the site. Bickley Road is an 'A'

road (A222) controlled by Transport for London, and Pines Road is a one-way road access from the signalised junction on Bickley Road. The site is situated within PTAL Zone 2-3.

The site is largely grassed or tree covered and all of the trees on the site are covered by a Tree Preservation Order. The boundaries to the site are largely comprised of trees and hedgerow. There is currently a small grass running track, 3 hard surface tennis courts (disused), 6 grass tennis courts (disused) and 3 sports pitches (to be retained) on the site. There are 4 low key buildings on the site which are an Air Training Corps sectional building, a timber sports pavilion and two timber storage sheds. All of these would be demolished as part of the proposal.

Existing vehicular access to the site is from Bickley Road and is formed of an old red brick wall with entrance gates and an original tree lined hard surfaced drive to central hard surfaced areas and an existing track through the trees. There is currently pedestrian access (used by the Girls School) from Pines Road.

The site is surrounded by residential properties to most boundaries and is in a predominantly residential area characterised by large detached and semi-detached dwellings.

Consultations

Comments from Local Residents

Nearby properties were notified and a significant number of representations (approximately 1500) have been received comprising objections and support. The split between the representations received is approximately 25% in objection (predominantly from local residential properties close to the site) and 75% in support (predominantly from prospective parents of the proposed school from a wider area).

In addition, 2 petitions have been received, one in objection and one in support.

Objections:

Objection comments have been received which are summarised as follows (all representations are available on file and have been considered in the production of this report):

- Efforts should be made to minimise environmental impacts and protect trees and wildlife
- Crossings in the area are dangerous for children
- Road safety and increased risk of accidents
- Congestion in the area is already very bad and roads at capacity
- Parking for the girls school is a big problem and there are a lot of car journeys causing road safety concerns

- Local roads will be used for parking
- Existing pavements are too narrow and dangerous
- Entrance should be on Bickley Road which is wider with transport connections
- Scale of development too great
- Detrimental and severe impact on the area and local residential amenities
- Increase in light, pollution, emissions and air quality
- Noise and in the area will increase especially from sports hall and playgrounds
- Site is Urban Open Space and should be protected
- Significant increase in traffic especially at peak times
- Construction traffic will have a major impact and routes are to use quiet residential roads
- Loss of trees, wildlife and greenspace
- Pines Road should become 2 way
- Exiting schools cause anti-social problems
- Site is not suitable for a school and too small for a school of this size
- School will not serve the local community
- This is a residential area
- Previous proposals on the site have been turned down by an Inspector due to the loss of valuable open space and trees and the impact on the character and appearance of the local environment
- More parking on site is required
- Exit onto Bickley Road is unsafe
- Chislehurst Road is too narrow for access and in a dangerous location
- Will affect Conservation Area
- Proposed buildings are not in keeping with the area and contrary of Policy BE1 of the UDP
- It is not possible to create a safe access from either Chislehurst Road or Bickley Road and the application must be refused.
- The conclusions of the revised Transport Assessment show over capacity in all directions indicating the site is not suitable for a school
- The submitted parking stress survey is inaccurate and counts non-existent spaces, it is a high parking stress area not low as being put forward
- A Travel Plan to reduce journeys by 10% is not sufficient or acceptable in an area subject to high congestion levels
- There is no parking for construction workers
- The proposal is premature in advance of the Local Plan process and undemocratic
- Nightingale Lane Adult Education centre would be a better site
- Students will come from outside the local area
- There will be accidents involving children
- The proposed school development will materially harm the site, urban open space and local environment and should be refused
- To improve visibility at the proposed access will result in more trees needing to be removed or cut back reducing screening and further tree loss

- Removing traffic islands for construction vehicles causing further highway safety concerns and more dangers for pedestrians
- Park and stride considerations have not been fully assessed or addressed in the reports
- Natural materials should be used for the buildings
- Public transport is already congested and at capacity
- Existing school sites should be extended
- Damage to area from HGVs
- Local residents will also be affected at evenings and weekends
- Parking controls are required and need to be enforced
- No evidence of other school sites considered
- Documents do not prove a need for a school on this site
- Transport assessment states all junctions will exceed capacity this is not acceptable
- There have already been 3 recent accidents at the junction with Pines Road and Chislehurst Road
- An independent traffic report should be commissioned by the Council
- Loss of existing facilities for the girls school
- Shawfield Road should not be used as a construction route
- Large and ugly building proposed
- School should be sited where it has room to expand with suitable infrastructure
- Too many schools in the area
- The application is misleading
- Playing fields should be protected
- Travel plan is incorrect and will not work in reality, it is not practical
- Construction access should be from the A222
- Pavements in the area are narrow, accidents will occur, these need to be upgraded
- The roads can't cope with another school
- Parking at junctions will cause visibility problems
- Access to residential properties will become a problem
- A crossing will bring traffic to a standstill
- Current traffic levels have not been adequately taken into account
- Illegal parking is already a problem and is dangerous
- Will result in a severe environmental impact affecting everyone
- Why is an unlisted wall being retained at the expense of the wider impact
- Double yellow lines are required
- Where will construction workers park
- Proof of the catchment area is required
- Urban green space should not be used for a school
- The transport report is of poor quality and is misleading in most respects
- Traffic surveys are not complete
- What about the effect on the quality of life for local residents
- 10 drop-off spaces is inadequate

- Parking problems at the girls' school cause major disruption and impact on residents getting to work
- Residents can't cope with more traffic
- Measures to reduce car use won't work
- Early start for children is not appropriate
- There are owls on the site
- All TPO trees should be retained
- Large vehicles will not be able to use mini-roundabouts proving the site is not suitable for this use
- Visibility at existing and proposed junctions is poor
- Not enough space to provide sports facilities for both schools
- Traffic calming will be required due to additional hazards
- There must be a better site available
- Impacts on existing junctions have not been properly considered
- Pedestrian safety, children don't use footpaths
- Traffic reports are inadequate and do not provide enough evidence
- Alternative sites have not been considered including Widmore Centre and the Civic Centre
- Community use is not acceptable - disruption outside school hours
- Existing secondary school are undersubscribed
- Existing schools have room for expansion
- It has not been proven that an access from Bickley Road is 'less preferable'
- Secondary School places are not linked to local catchment areas
- Why has this site been chosen above other sites identified in the local plan process
- The PTAL rating for the site is poor
- Open nature of the site is affected contrary to Policy G8 of the UDP
- School building is out of character in the area and contrary to policies 7.1, 7.4 & 7.6 of the London Plan
- The traffic and access problems associated with this development clearly identify this site is not suitable for a school
- There are only 2 bus routes that could serve the site this is not sufficient
- Additional car movements have been underestimated
- Roads in the area are regularly at a standstill
- Assumptions in the traffic assessment are not correct
- Neighbours were not consulted by the school as stated
- The school building is too close to residential properties (35m at the closest point)
- The development results in the loss of playing fields and is opposed by Sports England and contrary to Policy L6 of the UDP
- The proposed school and site do not comply with EFA basic standards
- The basic play provision standards are not achieved due to the restrictions on this site
- The proposed access is on the narrowest part of the road
- The route through the site will not be used to drop most children off
- The free flow of traffic around the site will be significantly affected

- Development is contrary to policy T18 of the UDP
- Children will congregate outside the school on a busy narrow road
- Signage will be in the direct view of residential properties
- Mitigation of noise for local residents has not been considered
- The building should be sited further away from Chislehurst Road
- Main pedestrian entrance should be from Pines Road which would be safer for pedestrians and the highway.
- The impact of the school development should be spread across the 3 adjoining roads not concentrated on Chislehurst Road
- Additional screening of the school is required
- Construction traffic should only enter from Bickley Road for safety reasons
- Questions raised over the need for a new school and in particular a boys school
- Bickley already has 9 schools in close proximity
- Proposed screening will not exist in the winter months
- Detrimental impact on privacy for nearby residential properties.
- The transport assessment confirms that Bickley Road has capacity but Chislehurst Road does not, why is the proposed access on Chislehurst Road
- No proper pavement for school children is being proposed in Chislehurst Road this is dangerous and unsafe
- Why is development concentrated in the northern part of the site, this has not been justified, why can't it be sited further south/more centrally within the site
- The Transport Assessment and its findings include a number of errors
- The school building will be overbearing for local residents
- The justification for educational need in the Borough is not correct
- Other site sites are preferable more suitable, this application is premature
- The site selection report submitted provides no comparison or assessment and its use is extremely limited
- Justification required by the Mayor of London has not been provided
- Bickley is in an area of open space deficiency and is an important local amenity space
- The disused tennis courts are used for football and rugby training
- The proposed sport pitch provision is inadequate for both schools
- Evening community uses will have a further impact on local residential amenity including additional cars, noise and lighting.
- Existing school places should be filled and unpopular schools made attractive with investment
- How can a school advertise places when it doesn't have planning permission
- Education provision in Bromley should be reviewed
- Public money should not be used to build a school which is not needed
- There are existing unfilled spaces in Bromley schools
- Estimates of the need for school places should be reassessed
- St Hughes Playing field was ranked a Group 4 B site and there are clearly other sites that are more suitable as identified in the Local Plan.

A petition with 702 signatures has been submitted objecting to the development on the grounds of increased traffic, parking difficulties, road safety issues, loss of playing fields and development on open space.

An Independent Traffic Report has also been commissioned and submitted by local residents and undertaken by Odyssey Markides. This has also been updated and revised following the revisions to the Transport Assessment. The report reviews the findings of the Transport Assessment and Construction Management Plan and highlights the highway impacts associated with the proposed development. It considers the local highway network, network capacity, parking, proposed access arrangements, traffic flow figures and ARCADY data and the construction traffic management plan including additional information submitted by the applicants. These reports conclude:

- The surrounding highway network is already operating significantly in excess of capacity with significant amounts of queues and the introduction of such a large trip attracting land use will compromise the operation of the local road network. No mitigation to address this has been proposed.
- In order to avoid queuing through the site via the one-way access arrangement, parents dropping off/collecting pupils will likely resort to waiting on Chislehurst Road and other local residential roads as opposed to using the one-way system resulting in reduced road safety and exaggerating congestion along Chislehurst Road.
- Increased levels of parking on private roads with residents liable for increased repairs
- Existing and proposed pedestrian facilities on Chislehurst Road are contrary to standards as they are not of sufficient width to accommodate the anticipated increase in footfall. This combined with increases in traffic volumes could lead to increased road safety concerns as pupils attempt to cross the road.
- The Stage 1 Road Safety Audit raises a range of serious highway safety concerns in relation to the schools proposed access arrangement.
- No assessment as to the catchments area of pupils and associated pedestrian/cycle routes has been provided or how these additional trips will be accommodated.
- The CMP provides an inadequate amount of detail and swept paths conclude that larger vehicles will not be able to manoeuvre onto Chislehurst Road. These will prejudice the safety and operation of the surrounding highway network.
- Consistent errors are present throughout the traffic flow figures which are used as the foundation for the junction capacity analysis. The traffic flow figures do not combine the various traffic scenarios correctly which results in an underestimate of the impacts of the development, particularly on Bickley, Chislehurst and Widmore Road roundabout which is already operating in excess of its capacity. Therefore the junction capacity analysis based on these figures is not fit for purpose.

- The significant variation of the results published in both versions of the TA and the sensitivity of the highway network, it is considered that the method of assessing junctions in isolation does not represent a sufficient nor credible analysis. As such, an alternative analysis model should be used to more accurately measure the impact of this development.
- A suitable construction route strategy has still not been established suggesting there is not a suitable route to accommodate construction vehicle access to the site.
- Given the existing stress on the junctions within the immediate vicinity of the site, the site is not suitable to accommodate the peak hour quantum of additional traffic associated with the proposed land use.
- The proposals will prejudice the operation and safety of the surrounding highway network which is contrary to the NPPF (2012) and should be refused on highway grounds.

A letter from Bromley Borough Road Safety Panel raising concerns has been submitted and identifies in summary that:

Adequate vehicle arrangements for the site are required to prevent traffic and road safety problems on the surrounding roads and also adequate on-site parking to prevent excess parking on public roads. On-site drop-off/pick-up point is welcomed but more parents will drop off on Chislehurst Road creating hold-ups. Chislehurst Road should be widened for a section to provide a layby for drop-off or create an additional internal road. On-site parking appears adequate for staff only with little scope for large groups of visitors. The internal road should be widened to create additional parking space along its entire length, minimising on street parking and congestion.

Chislehurst Society have also submitted an objection to the proposal stating: the D&A presented a very good heritage appraisal of the school buildings and site, but this appears to have little connection to the proposed design for the building which is a disappointing and mundane solution to the need for additional space.

Sundridge Residents Association has also written a letter of objection which is summarised as follows:

- There is no clear indication that a secondary school is required in this location.
- Loss of sports facilities from Bullers Wood Girls School and their intensive shared use with a Boys school cannot be a popular option.
- The single school building is clearly inadequate other than as an opening solution to a Government Directive to find space for a school. The design concept is cramped and ill conceived. The site is inappropriate.
- Where will the missing facilities be put? Valuable urban open space would soon evaporate.
- The proposal will increase traffic congestion and hazard in a location which is already at saturation point.

- It will impose related parking and drop-off and pick up activities in adjacent residential locations seriously eroding residential character
- We would urge therefore that the additional implications and consequences of this development are fully considered.
- We would urge that consideration is given to finding a more suitable larger site elsewhere with better access facilities.

Support

Letters of support have been received which are summarised as follows:

- Government supports additional schools and policies encourage education provision. This proposal accords with government policy.
- Serious lack of school places and choice especially for boys
- Boys school is much needed and a great opportunity in Bromley
- Not enough Secondary School places in the Borough
- Traffic and congestion will be limited
- Parents consider moving away to get secondary school places
- Only option for local area and parents
- Boys currently have to travel across the Borough
- Children can walk to school rather than be driven across the Borough
- Design is well considered and minimal visual impact
- Continued development will only increase the pressure on schools
- Environmental and infrastructure issues have been well considered
- This is in partnership with the Girls School and will complement it
- The demand is high locally - boys will walk or get the bus
- Staggered school hours have addressed traffic concerns
- Trees are retained and new tree planting is proposed
- Extra amenities and school places are required
- Need within the local community
- Such a school would be welcome in the Borough
- Schools should be available locally and in walking distance
- More desirable location to live in
- Schools are oversubscribed – a number already have ‘bulge’ classes
- The EFA have approved the site
- Bullers Wood Girls is a highly rated school
- Children will be able to walk or get a bus to school
- The site is already used by a school
- Meets educational needs of local children which are only going to increase
- Where else will a school go
- Lack of local schools increases congestion and traffic
- The efforts made to limit its effects on the environment and local residents are considerable
- The land is currently underused
- Last year there were 480 applicants for 180 places.
- Will relieve capacity issues at existing schools
- The proposed road system reduces congestion

- Can only benefit the local area
- Fits into its surroundings
- The site already has buildings on it
- Children will be able to walk to school
- Understand neighbours' concerns but these have been addressed
- Low key impact of the building
- There is a need for excellent facilities for boys in Bromley
- Better than housing on the site
- This is a great opportunity for Bromley and its education provision and choice
- Management is already in place at the Girls School
- Excellent choice of site
- Applicants have gone to great lengths to minimise traffic impact
- The new school proposes different start and finish times to avoid congestion
- Objectors have no personal need for the school
- Demand for a single sex boys school
- More housing needs more schools and education is crucial
- This should be approved for the wider community and its benefits for education
- Boys should have the same choices and education experiences as girls within the Borough
- The proposals should be supported and welcomed.

A petition with 782 signatures has been submitted in support of the application for a new school on the grounds of the need to show support from prospective parents for the school and to show the demand and difficulty in getting secondary school places.

Comments from Consultees

Highway Authority:

“Construction Management Plan: One issue with the construction phase is large vehicles being unable to use the Chislehurst Road / Bickley Road roundabout. Removing the islands here for a significant period of time would not be acceptable. The possible alternative for the vehicles to use Shawfield Park has raised a number of complaints. It would be helpful if more details could be given about the numbers of vehicles that cannot use the existing roundabout and over what period of time they are likely to need to access the site. It may be possible to look to remove the islands for short periods, particularly if alternative arrangements can be made.

An alternative would be to use a new access from Bickley Road as the construction access. There will need to be a restriction on vehicle movements during the peak hours but it should overcome these problems. I think a scheme should be drawn up to compare with the Chislehurst Road option to see what the impacts will be. There needs to be parking on-site for construction workers which was mentioned in the meeting but not referred to previously.

Construction period: In addition to the parking on site for the site workers, there also needs to be delivery / turning areas on site for the delivery vehicles. If there are large numbers of vehicles arriving per day during some periods of the construction phase there needs to be a system in place to ensure vehicles do not have to queue on the highway.

There would be no parking on site for parents during this phase. Parking on Bickley Road, the nearest available, is likely to cause interference to the free flow of traffic and congestion.

Access arrangements: The proposal is for the main access to be from Chislehurst Rd with the exit to Bickley Road. This has some merit in that it does spread any impact between the 2 roads. However, the Chislehurst access has raised a number of objections and issues were raised in the Road Safety Audit. As with the construction phase an alternative scheme(s) should be drawn up to see what the impacts would be on providing the access only from Bickley Road.

Full operation: There was a Road Safety Audit carried out on the proposed Chislehurst Road access. This should ideally have covered the other accesses in Bickley Road and any other highway works. The main issues raised were visibility splays, parking at the access, swept paths and the lack of footway. The visibility splays will require the removal of trees and vegetation and regular maintenance. I am not sure that I agree with the designer's response to items 3.1.3 or 3.4.1. There could be "School Keep Clear" markings provided but yellow lines have limited effect around schools unless a traffic warden is continually present.

Crossing Bickley Road in the vicinity of the school is a serious concern. There are options but if a pelican [crossing] is being proposed it needs to be justified, designed, safety audited, TfL's views sought etc. TfL raised the issue of bus overcrowding and suggested staggered timings with the Girls' School. Details are needed of how this being taken forward. Can coaches go into the site?

There is no mention of use of the Sports Hall. Depending on the type of use/events there could be overspill parking on Chislehurst Road. A more detailed assessment needs to be included.

A fundamental issue would be whether parents go onto the site to pick up /drop off pupils. This could depend on a number of factors, such as parent's routing. However, is there enough waiting space for the number of vehicles forecast? Will the length of time drivers take to go through and exit the site deter them from going in?

Trip generation /modal split / assignment: The modal split is from the Girls' school and the distribution from the pupil applications. Does the distribution correspond with the Girls' school? The number of vehicular trips has been reduced using various assumptions – siblings, use of Travel Plan etc but the modal split would already have taken these into account. Table 6-4 needs to

be expanded to show the working. Table 6-8 Local assignment – is that correct?

Junction modelling: Linsig - There were no issues with the overall construction of the model and all the stages/intergreen timings etc all matched with the timing sheet and all the flows were balanced.

However the following data was not gathered;

- Lane balancing - entry lane balancing was used within the model. However when traffic has the choice of two upstream lanes, the majority of flow was placed on one lane. For eg from Zone A to Zone C – 7 vehicles are placed in Lane 2 and 538 in Lane 2 – when in reality this would probably be more balanced.*
- Saturation flows – in the model the sat flows used were those calculated by the programme based on the geometric information. The saturation flows should have been collected on site during peak periods.*
- Cruise times – the default value was used in the model. These should have been collected on site also.*
- Signal timings – some stages are demand dependent - no evidence was provided of this data from TfL on the demand dependent stages (how often and for how long they are called) to be input into the model. Average signal timings should have been gathered on site and a spreadsheet with this information provided. All timings were running at max – which may not actually always be the case on site.*
- No validation results were provided – a comparison of degree of saturation values from the model results with those calculated from on-site measurements and no evidence of queue length survey results for comparison with the queues from the modelling. This is required to show that the model represents what is actually happening on site and is a TfL requirement.*

Other issues noted with the traffic flow diagrams;

- Although probably just a typing error – no flows were shown entering the site on any of the flow diagrams. The volume of traffic leaving the site on the flow diagrams did not match that contained in the 'in/out' box.*

Arcady - The modelling showed significant over capacity of the junction. There were no surveyed queue lengths provided. Given Arcady may be unreliable once the junction goes over capacity it is difficult to say how much reliance can be placed on the results.”

Revised Highway Comments (following submission of further information):

“The site is located in the triangle of land surrounded by Bickley Road, a London Distributor Route and part of the A222, Chislehurst Road, a Local Distributor and part of the B264 and Pines Road. There is an existing vehicular access from Bickley Road and there is also a pedestrian access in Pines Road

The proposal is for a new secondary school for 900 pupils with 64 FTE staff. A number of documents relating to the potential highway impact of the

proposals including a Transport Assessment (TA), a stage 1 Road Safety Audit and a Construction Management plan were included with the application. These have been updated as the application has progressed.

Construction Management Plan: A CMP was supplied with the application. The proposal is to use the new Chislehurst Road access for construction traffic. The construction of the main school will take place while the first year intake (180 pupils) is on site. There will be 10 parking spaces for parent's drop off and pick up and 9 spaces for school staff accessed from Bickley Road. Site staff will park on the northern side of the site using the Chislehurst Road access. Although turning and parking areas are shown there do not appear to be any areas for material storage.

The approach / egress from the site is restricted by a number of existing features:

- Network Rail bridge that crosses the A222 @ Summer Hill – Height restriction 4.40m;
- Network Rail bridge that crosses the B264 @ Old Hill – Height restriction 3.80m;
- Single Access Point into the Playing Fields / Widmore House grounds – Width restriction 3.50m;
- Existing Access road serving Playing Fields / Widmore House grounds potentially unsuitable for heavy goods; and
- A222 / B264 roundabout junction at Widmore Road restricted access for vehicles heading north bound that need to turn right (“hairpin” bend that inhibits the turning circle of longer wheel base vehicles).

Options were looked at for a construction vehicle access from Bickley Road. However, these were discounted due to health and safety concerns because of the potential of conflict between the pupils and construction traffic, the works that would be needed to the internal road layout and the potential for disruption to the flow of traffic on Bickley Road.

In order to allow large vehicles to use the Chislehurst Rd / Bickley Road roundabout, turning to/from Widmore Road and Chislehurst Road, the traffic islands at the roundabout would have to be removed. The timescale given for this was up to 18 months. The islands are used by pedestrians, including pupils from Buller's Wood School for Girls, to cross the roads and they also control the deflection of vehicles around the roundabout. Removal of the islands for that period of time would not be acceptable. An alternative would be to route large vehicles around Shawfield Park. This is likely to require waiting restrictions at the junction with Chislehurst Road.

The CMP concludes that full details about the construction programme and vehicle routing will be discussed between Kier, Transport for London and LBB and secured by condition. This leaves the various issues unresolved.

Temporary Accommodation: A prefabricated building will be placed on the southern car park for a year to accommodate the first year intake of 180 pupils and 10 FTE staff while the main school is built. A total of 10 parent drop off

spaces will be provided during the construction period. A further 9 spaces will be provided for the staff and visitors. The access from Bickley Road is only wide enough for one vehicle and it is not clear how this will work during drop off and pick up periods.

In order to estimate the modal split, the travel survey data from the existing staff and pupils at the Girls School was used and the following table was given in the TA. The data from the Girls School would include siblings sharing so the figures for car sharing may be on the high side for a one year intake.

Mode	Pupils (180)		Staff (10)		Total
	%	Number	%	Number	
Car	15%	27	70%	7	34
Car share	10%	18	4%	0	18
Park & Stride	6%	11	3%	0	11
Rail	16%	29	7%	1	30
Bus	24%	43	1%	0	43
Cycle	0%	0	4%	0	0
Walk	28%	51	12%	1	52
Total	100%	180	100%	10	190

Proposed Development:

Access arrangements: A new access is proposed from Chislehurst Road. The existing access on Bickley Road is being retained as the exit for light vehicles. Service vehicles will enter and exit via Chislehurst Road. A new pedestrian access is also proposed from Bickley Road.

There is currently no footway along the south side of Chislehurst Road. A pedestrian access point is being provided adjacent to the vehicle access and sightlines are being provided by cutting back the existing vegetation.

On-site parking: Two areas of parking are proposed on the site. One car park for 11 vehicles, including 5 disabled spaces, is to the north of the site by the proposed Sports Hall. The main car park is in the south west of the site with provision for 58 vehicles. There is also a drop off / pick up bay for 10 vehicles on the northern edge of the main car park. A turning area is provided at the end of the car park. Coaches will not enter the site and it is suggested they will use the nearby bus stops. Although coaches can pick up and drop off passengers at bus stops they cannot wait there.

Cycle parking: A total of 18 Sheffield stands will be provided on the site, giving provision for 36 cycles. It was noted that surveys at Bullers Wood Girls School showed no pupils and 4% of staff currently cycle. Based on that, 7 cycle stands would be required for this site. There is space on site to provide more parking facilities if required.

Delivery and servicing: Servicing and deliveries to the site will take place from the new vehicular access on Chislehurst Road. All delivery and servicing

vehicles can turn on site and leave via the same access. Swept paths were provided for a large refuse collection vehicle.

Parking surveys: Parking stress surveys were carried out in roads within an approx. 400m walk distance of the site in May 2016. These were between 0700-1000 and 1430-1830 at 30 minute intervals. They showed that there were a large number of spaces available throughout the survey periods. However, a lot of the spaces are on roads such as Bickley Road and Chislehurst Road, the closest to the site accesses, where parking is likely to cause interference with traffic flows. The nearest roads such as Pines Road and Shawfield Park where parking could reasonably be accommodated are already heavily parked.

Main School Development: Again, applying the existing modal splits from the Girls School to the proposed Boys school would give the following results for the full school operation:

Mode	Pupils (900)		Staff (64)		Total
	%	Number	%	Number	
Car	15%	137	70%	45	182
Car share	10%	90	4%	2	92
Park & Stride	6%	53	3%	2	55
Rail	16%	147	7%	5	152
Bus	24%	217	1%	1	218
Cycle	0%	0	4%	2	2
Walk	28%	254	12%	8	262
Total	100%	900	100%	64	964

The TA then argues that this does not consider the effect of siblings sharing which would reduce the car trips by 5% and the effect of the School Travel plan which would reduce trips by 10%. However, this seems ambitious particularly given the modal split is taken from a school with a Travel Plan in place and where there would be siblings present.

Travel Plan: If the School should gain permission a School Travel Plan would be required which I assume can be conditioned.

Sports Hall – Out of hours community use

The hall has the potential to be open and operational after school opening hours and at the weekend. The TA indicates that it is intended the activities could include sports, health/community groups and educational related activities and not for social uses such as weddings and parties. The traffic would route as per the school, vehicles would enter via Chislehurst Road and exit onto Bickley Road. Parking on the site would accommodate 68 cars and in the event parking demand exceeds that, for example parents evenings, the two games courts will be open and accommodate up to 80 additional cars. This will require marshalling to ensure that level of parking can be achieved.

Junction Modelling

The 3 junctions at the corners of the site have been subject to modelling to demonstrate the effect of the additional school traffic. The surveys show that the junctions are working close to or over capacity at present.

The roundabout junction of Bickley Road and Chislehurst Road is overcapacity at present. There are substantial queues on Chislehurst Road in the AM peak. The computer model, ARCADY, is generally accepted as becoming unreliable once the junction goes over capacity and so it is unclear how much weight can be given to the results. There are other anomalies with the traffic flow diagrams shown in the TA. If the numbers input to the models are lower than those surveyed the results will underestimate the situation.

Given it is close to capacity, the highway network is obviously very sensitive to increases in traffic flows. As the junctions are likely to interact, together with the introduction of a signalised crossing on Bickley Road, there is a question whether the modelling will give a good indication of the existing and proposed situations. The additional school flows will only make the situation worse but, from the modelling presented in the TA, it is difficult to assess the level of the impact.

Impacts from the Development

The assumption that goes with the layout and access arrangements is that parents will drive into the site to drop off and pick up children. However, there are only 10 short term parking bays provided which is well below the estimate of 137 cars. There is space within the site on the access road for vehicles to queue but much of this is single track and so vehicles will be unable to overtake should a car in front be delayed for any reason. Although there is an estimate in the TA of how long it takes to drive through the site there is no assessment of how long it will take to exit onto Bickley Road. This is likely to be an issue given the amount of traffic on Bickley Road, particularly in the afternoon, when a large number of vehicles will be trying to leave the site at the same time.

This means that it is highly likely that parents will park and wait on nearby roads to avoid going through the site. The two nearest roads to the site, Chislehurst Road and Bickley Road, are likely to be the most attractive and parking here will interfere with the free flow of traffic. Chislehurst Road already has queuing from the mini roundabout going past the proposed access and this will only exacerbate the situation.

Waiting restrictions are unlikely to deter such parking unless there is a Traffic Warden present.

Chislehurst Road access

The Stage 1 Road Safety Audit raised a number of issues with the access. There is no footway present and so the visibility splays, both for vehicles and pedestrians exiting the site, rely on the vegetation being cut back. A crossing point is proposed, rather than a footway, and so there is unlikely to be sufficient width to cope with the people trying to use it. The advice in Manual for Streets is that footway widths in excess of 2m should be considered for areas around schools. If parents are dropping off children on this side of the

road they will end up walking in the road to the entrance. If they cross the road, the footway on the northern side is substandard. In the morning peak the pupils heading towards Bullers Wood School for Girls already take up the footway for periods of time.

Public transport use

Trains: There are 147 pupils estimated to use the train. The footway from Bickley station along Southborough Road towards Bickley Road is relatively narrow. In the morning peak pupils will be going against the flow of commuters going towards the station and people will step into the road. The carriageway is also relatively narrow so they will be in conflict with vehicles.

Buses

There are over 200 pupils estimated to come to the school by bus. There are 2 bus stops in proximity to the Bickley Road access. However, there is no nearby crossing point and, given the level of traffic flow, some form of crossing would be needed to get pupils across the road. A puffin crossing has been proposed to allow people to cross Bickley Road. If this is to be taken forward it will need to be secured via a s278 or s106 agreement. Alternatives would have been a traffic island or a zebra crossing. There is no indication an assessment was made of the alternatives. The island would be required to be of a suitable size to accommodate a relatively large number of people at one time. Given the road width there would need to be localised road widening which would mean land take from the school site.

The bus stop by the access in Bickley Road will need to be moved to accommodate the crossing. TfL have agreed to the principle of this.

TfL's initial response indicated that, given the number of pupils, there will be constraints on the local bus services (routes 162 and 269). Pressure on these services could be relieved if the school start and finish times are staggered with the nearby Bullers Wood School for Girls. Failure to do so would require mitigation to meet the demand for bus travel. The Boys School would start at 07:45 and end at 15:20, the Girls School would start at 08:25 and finish at 15:10. TfL have accepted this but there does not appear to be much of a difference given the additional distance to the Girl's School from the bus stops on Bickley Road.

Coaches will not be able to enter the site and it is suggested they will use the nearby bus stops. Although coaches can pick up and drop off passengers at bus stops they cannot wait there.

Conclusions:

There will be an impact during the construction period but the routing of large vehicles has not been determined. The local highway network is operating at or close to capacity and the traffic generated from the proposed school will only add to the sometimes substantial delays on the network.

Parents are likely to avoid going through the site due to the delays involved and will drop off and pick up pupils on the surrounding road network, in particular Chislehurst Road and Bickley Road.

The proposed access on Chislehurst Road has sub-standard pedestrian facilities. The items raised in the Stage 1 Road Safety Audit were not suitably addressed.

Consequently I would recommend refusal of the application due to the potential detrimental effect on road safety and free flow of traffic being contrary to policy T18 of the UDP 2006.”

Transport for London (TfL):

“Please note that these comments represent an officer level view from Transport for London and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this project. These comments also do not necessarily represent the views of the Greater London Authority, which should be consulted separately.

Site Context *The site is located within a parcel of land that is bound by the A222 Bickley Road to the south, Chislehurst Road to the west and Pines Road to the east. The Public Transport Accessibility Level (PTAL) ranges between 2 and 3 for the site which is considered average to poor accessibility. Bus stops are located on the A222 Bickley Road where access to two bus services can be achieved and Bickley Station lies approximately 650 metres to the southeast.*

Vehicle Access and Trip Generation *The main access to the site is proposed to be provided from Chislehurst Road to the north west of the site. This will form an ‘in only’ vehicle access, with vehicles then routing through the site and exiting onto the A222 Bickley Road. TfL considers the approach to trip generation and modal split acceptable and in line with London Plan Policy 6.3. Given that the site is not within close proximity to the Transport for London Road Network (TLRN) it is unlikely that the proposed development would result in an unacceptable impact to the TLRN.*

Car Parking *A total of 69 car parking spaces are proposed including 5 disabled parking spaces. A drop off / pick up bay is also proposed within the site to accommodate around 10 vehicles. The School Travel Plan should encourage use of more sustainable travel modes to reduce the amount of travel by car in line with London Plan policy 6.3. The applicant should also consider the inclusion of Electric Vehicle Charging Points (EVCPs) and a provision of 20% active EVCPs plus 10% passive EVCPs is recommended.*

Cycle Parking *A total of 36 cycle parking spaces are proposed which is less than the minimum standards set out in the London Plan. TfL requests that the number of spaces be increased to 129 spaces in line with required standards.*

Buses *As agreed with TfL in principle, the applicant seeks to relocate the existing bus stop (number 19745) and shelter (number 0106/1179) on the northern side of the A222 Bickley Road to a location around 40 metres to the east. The bus stop on the southern side of the carriageway (number 19744)*

and shelter (number 0106/1203) would remain in its current location. It has been requested by TfL that the bus shelter on the southern side of the A222 will be increased from a 2 bay to a 3 bay to meet the likely demand.

The highway works associated with the bus stop relocation and shelter upgrade will need to be confirmed via a detailed design process which should be secured via an appropriate condition or planning obligation in consultation with TfL. Furthermore the applicant is aware that they will be responsible for all costs associated with the works and again this should be secured by a condition.

TfL have considered the likely impact on bus capacity and it is noted that given the number of pupils proposed there would be some constraint on the local bus services (routes 162 and 269). Pressure on these services could however be relieved should the school ensure arrival and departure times are staggered with the nearby Bullers Wood School for Girls.

Failure to do so will require mitigation to meet the demand for bus travel in line with London Plan policy 6.7. This should be included as part of the School Travel Plan and secured by condition. It should be noted that the method of providing contributions towards bus network enhancements is currently subject to government advice. There is a limited settlement to TfL from the government to fund bus network improvements for free schools/academies. Should mitigation with regard to bus contributions be required the level of mitigation will need to be agreed with TfL.

Travel Plan TfL welcomes the provision of a draft School Travel Plan which sets out relevant aims and objectives to encourage sustainable travel. Involvement in the TfL school travel planning accreditation scheme (STARS) is encouraged and the Travel Plan should be regularly updated and monitored to ensure compliance with London Plan policy 6.11. A commitment to updating, monitoring and funding the travel plan and associated measures should be secured as part of any planning permission. As identified above measures to minimise impact on buses including staggering start times should be provided.

Community Infrastructure Levy (CIL) It is noted that the proposed secondary school use would be exempt from the Mayoral CIL.

Summary In summary, TfL confirms that the proposed development would be unlikely to result in an unacceptable impact to the TLRN; however given that a number of the pupils would be expected to travel by bus the arrival and departure times of the proposed school should be staggered with surrounding schools to alleviate the likely impact on bus capacity. Further discussions regarding the detailed design of the bus stops and shelters located on Bickley Road should be held between the applicant and TfL, electric vehicle charging points should be delivered, the level of cycle parking should be increased and the School Travel Plan will need to be updated and monitored to ensure consistency with London Plan policy.”

Revised comments:

TfL provided initial comments which should be read in conjunction with the following comments:

The proposals comprise the development of a new secondary school to accommodate 900 pupils, supported by 64 staff. The site is allocated in Bromley Council's draft Local Plan (November 2016) for education, to meet future demand for secondary school places. TfL is currently providing comments to Bromley Council with respect to the Local Plan policy.

The layout of the development includes an entrance to the site from Chislehurst Road and an exit only onto Bickley Road in the location of the existing site access. This would require moving the existing eastbound bus stop approximately 40 metres to the east of its current location to improve visibility from the junction. TfL has accepted that the existing east bound bus stop (number 19745) and shelter (number 0106/1179) can be relocated no more than 40 metres to the east. The west bound bus stop (number 19744) will be retained in its current location.

TfL welcomes the proposed staggered arrival and departure times which was requested to alleviate demand on existing bus services at peak times. This should be secured by an appropriate planning condition.

To consider future demand for bus services, TfL has requested that funding is secured to increase the size of the existing west bound bus stop (number 19744) and shelter (number 0106/1203) from a 2 bay to a 3 bay facility. The highway works associated with the relocation of the east bound bus stop, increase in the size of the west bound stop and shelter upgrades will be confirmed through the detailed design process which should be secured via an appropriate planning condition or obligation in consultation with TfL. The applicant will be responsible for all costs associated with the works.

TfL welcomes the proposal to provide puffin crossing facilities on Bickley Road. Details will need to be confirmed via the detailed design process which should ensure that there will be no conflict with bus movements which could result in road safety concerns.

There is no change to the proposed on-site car parking provision. TfL considers the proposed parking provision to be high and the School Travel Plan should aim to significantly reduce car trips in favour of active travel. TfL welcomes the commitment to provide two Electric Vehicle Charging Points (EVCPs).

The plans demonstrate that a total of 129 cycle parking spaces can be accommodated within the site, although 36 spaces will be provided on opening of the school. TfL confirms this approach to be acceptable provided that the space designated for future cycle parking provision is safeguarded and that this is monitored through the travel plan. This should be secured by a planning condition.

TfL welcomes the commitment from the school to participate in TFL's STARS accreditation scheme and the target to achieve bronze accreditation by June 2018 and silver accreditation the following year.

The provision of a Construction Management Plan (CMP) is welcomed and the applicant should ensure that no construction related deliveries will be undertaken during the peak periods (08:00-09:00 and 16:30-18:00). It is imperative that road safety measures are considered and preventative measures delivered through the construction and operational phases of the development and TfL encourages the use of contractors who are registered on the FORS system.

Subject to the above conditions being met, the proposal as it stands would not result in an unacceptable impact in strategic transport terms."

Sport England:

"It is understood that the site forms part of, or constitutes a playing field, or prejudices the use of a playing field, as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). The consultation with Sport England is therefore a statutory requirement. Sport England has considered the application in light of the National Planning Policy Framework (particularly Para 74) and Sport England's Playing Fields Policy.

Sport England's policy is to oppose the granting of planning permission for any development affecting playing field land unless it meets with one or more of the five exceptions stated in its policy. The proposed development would appear to be sited on an existing area of playing field. Locating this aspect of the proposed development on the existing playing field would prejudice the use of the playing field.

*In light of the above, Sport England **objects** to the application because it is not considered to accord with any of the exceptions to Sport England's Playing Fields Policy or with Paragraph 74 of the NPPF.*

Should your Council be minded to grant planning permission for the development then in accordance with The Town and Country Planning (Consultation) (England) Direction 2009, the application should be referred to the Secretary of State, via the National Planning Casework Unit."

Second comments following the submission of additional information:

"Further to Sport England's consultation response dated 09th August 2016 and subsequent response dated 31st August 2016, unfortunately Sport England is of the view that no new information has been provided and that all relevant considerations set out in the email and attached document recently provided were taken into account within Sport England's formal consultation response dated 9th August 2016. For the avoidance of doubt, this proposal does not meet exception E1 of Sport England's Playing Fields Policy as Bromley do not have a robust and up to date playing pitch strategy in place.

Sport England's statutory objection is on the basis of a loss of part of the overall playing field area (in physical and functional terms), which includes the area to the south east of the trees which has been marked out for playing pitches in the last five years and the area to the north east which currently is not marked out for pitches. Therefore, Sport England classifies the area to the north east of the trees as part of the whole area of playing field, unless the applicant provides a legal opinion to demonstrate otherwise. Notwithstanding this, there is evidence of mobile football goals on the right rectangular fenced area to the north west of the trees. Furthermore, the bin store and sub-station are proposed to be built on the part of the playing field which currently contains a football pitch (as illustrated on the Existing Sport Pitch Provision – Winter plan). An addition, as I am sure the Council will be aware, the St Hugh's Playing Fields are currently designated as Urban Open Space. A potential way forward would be to propose a replacement playing field or playing fields in line with policy exception E4 of Sport England's Playing Fields Policy.

Sport England therefore maintains its objection to this planning application. Should your Council be minded to grant planning permission for the development then in accordance with The Town and Country Planning (Consultation) (England) Direction 2009, the application should be referred to the Secretary of State, via the National Planning Casework Unit.

However, Sport England would be happy to review its position if it can be demonstrated that Sport England's Playing Fields Policy can be met. A potential way forward would be to propose a community size 4 court sports hall (34.5 x 20m) and position the proposed MUGAs side by side and fence them (sports lighting should also be considered). This would provide more capacity they would constitute formal sports facilities. Sport England would then assess this proposal against E5 of Sport England's Playing Fields Policy.

Please note that Sport England has assessed the application and commented accordingly and it is our view that this application does not comply with Sport England's Policy."

Third comments following the submission of additional information:

"Further to Sport England's consultation response dated 09th August 2016 and subsequent responses dated 31st August 2016 and 23rd September 2016, unfortunately Sport England is of the view that no new information has been provided and that all relevant considerations set out in the email and attached document recently provided were taken into account within Sport England's formal consultation response dated 9th August 2016.

Sport England therefore maintains its objection to this planning application.

Should your Council be minded to grant planning permission for the development then in accordance with The Town and Country Planning (Consultation) (England) Direction 2009, the application should be referred to the Secretary of State, via the National Planning Casework Unit.

If the Council are minded to approve this application, Sport England would recommend that the following condition is attached to the decision notice:

Use of the development shall not commence until a community use agreement prepared in consultation with Sport England has been submitted to and approved in writing by the Local Planning Authority, and a copy of the completed approved agreement has been provided to the Local Planning Authority. The agreement shall apply to the sports hall, changing rooms and remaining playing field and include details of pricing policy, hours of use, access by non-educational establishment users, management responsibilities and a mechanism for review [, and anything else which the Local Planning Authority in consultation with Sport England considers necessary in order to secure the effective community use of the facility]. The development shall not be used at any time other than in strict compliance with the approved agreement.

Reason: To secure well managed safe community access to the sports facility, to ensure sufficient benefit to the development of sport.

Informative: Guidance on preparing Community Use Agreements is available from Sport England www.sportengland.org.”

Environmental Health:

Contamination: *“The Phase 2 finds some elevated hydrocarbon levels and full ground gas results are still awaited. Contamination will not be a bar to the development but some further work is needed. A K09 condition should be attached.”*

Noise: *“The Planning statement recognizes the potential for an amenity impact from noise but states ‘it is not considered that the increase in people using this site and the activities associated with operation of the new school building will give rise to unacceptable disturbance...’. There is an ‘Acoustic Strategy Report’ which deals with Building Regulations \ BB93 compliance but I could not find any acoustic assessment to evidence this statement or to properly detail acoustic impact of the proposal on surrounding residents. There will be noise impacts from external games \ PE and playgrounds. I appreciate the current use is as a playing field but it appears to be little used with parts not used at all and this will be a very large intensification of use up to 900 pupils and 64 staff. There will also be noise from external traffic movements on site from the 68 vehicle car park and traffic from drop off and pick up vehicle movements. The impact is likely to be adverse on some residents. Whilst the adverse impact may ultimately be balanced against the benefits of the proposal I would suggest that we request an acoustic assessment to examine these points and cover reasonable mitigations.*

In respect of plant noise the documents state that the ventilation system will comply with certain standards but we would expect a full BS4142 assessment. This could be covered by an appropriately worded condition.”

Extraction\ Ventilation: “No odour abatement plant is proposed but given the use, location, and high level high velocity discharge, this is considered to be reasonable in this case. Noise would be covered by the plant noise condition.”

Lighting: “It will be possible to ensure reasonable residential amenity in respect of lighting however there will inevitably be some lighting impact on neighbouring properties as the existing situation is a dark field. A Lighting Statement document is included which is fine as far as it goes. I would suggest we still attach a condition for submission of final lighting details and including full lighting spread plans (which are omitted from the submitted document). My understanding is that no floodlighting is planned for fields.”

Air Quality: “The site is outside although fairly close to an AQMA. The Air Quality assessment finds that the impact of the development on the local area is not significant and the exposure of the site to poor air quality is also below acceptable limits. I would recommend that conditions relating to electric car charging points, non-road mobile machinery and the submission of a construction management plan are attached to mitigate and minimise impact as far as is reasonably practical.”

Additional comments following submission of further information:

“I have reviewed the additional information and have the following additional comments:

Contamination: I am now satisfied no condition is necessary however I would request that an appropriate informative is attached to any permission:

Noise: Comments noted. I will await updated report. Please ensure the report covers mitigation as per NPPF p.123 requirement to ‘mitigate and reduce to a minimum other adverse effects..’. In most cases where an impact is adverse but not significantly so we would expect mitigations like acoustic fencing, behavioural controls, controls on hours of use of playing fields etc.

Lighting: Comments noted. I will await updated plans. If final plans submitted in advance then we would have no need for a condition.

Air Quality: This covers air quality mitigation which is not included in the Traffic Management Plan. Whilst the attached may be suitable for Highways Section 5, Measures to reduce Environment Impact Noise, Vibration, Dust and Emissions, makes no reference to air quality mitigation.

The updated acoustic report finds that there will be a small increase in average noise level for residents surrounding the site. The report concludes this is ‘minor adverse’ in the short term, becoming ‘negligible’ in the long term. This short-term\long-term distinction is not based in planning policy but it is assumed the impact is reduced as people become accustomed to the noise. Whilst only a small increase in average noise level is predicted, this should be considered in light of the fact that existing average noise levels at this location already exceed WHO Community Noise recommendations (as is

fairly common in urban sites) so the development is contributing to a cumulative impact. I should also point out that the report only considers average noise level and states:

'Maximum noise levels such as shouts, whistles, screams or ball impacts are likely to be audible at the surrounding dwellings depending on the location of the source. However these are very difficult to quantify accurately given the large number of variables involved (e.g. noise type and location).'

The WHO document mentioned above states:

'It is not enough to characterize the noise environment in terms of noise measures or indices based only on energy summation (e.g. LAeq), because different critical health effects require different descriptions. Therefore, it is important to display the maximum values of the noise fluctuations, preferably combined with a measure of the number of noise events.'

It is very difficult to accurately assess this type of noise but maximum noise events such as those described also impact on residential amenity and the effect of this has not been considered in coming to the conclusion of negligible impact. Finally noise in gardens will in some cases slightly exceed the predicted levels, which are all predicted at building facades.

Overall I do not agree that the impact will be negligible. Based on the noise levels measured and with the expected noise character there will be a lower adverse impact on residential amenity from this development. The noise is likely to be 'Noticeable and intrusive' but not 'Noticeable and disruptive' as per Planning Practice Guidance. If you are minded to grant permission this impact needs to be accepted and whether the benefits of the proposal outweigh a small detriment to immediately surrounding residents.

It may be possible to mitigate and minimise further through use of carefully placed acoustic barriers such as fencing around the boundary, specific sports fields or the car park but the consultant would need to advise on the value or effectiveness of this in this case based on their assessment. In some cases this can be uneconomic or of very marginal benefit. As a minimum I would suggest that a condition is attached to restrict use of playgrounds and outdoor sports facilities to 8am -7pm Monday to Fridays. You could also attach a condition to prevent hire of facilities for use by other parties to restrict use to essential school activities only and prevent any noise at weekends.

The impact is clearly adverse for the reasons detailed, but in very general terms we need to be realistic that putting a school of 900 pupils and 64 staff on what was previously an open playing field is likely to adversely impact those living around it. I am not recommending refusal of the application but this detriment needs to be accepted if planning permission is granted. Interpretation of the NPPF and NPPG is that in this situation permission can be granted but we must 'mitigate and reduce to a minimum' the adverse impact. The NPPG is clear that this should be done 'taking account of the economic and social benefits being derived from the activity causing the noise'. There are several ways of mitigating and minimising noise ranging

from physical barriers to restrictions on hours of operation. However, the extent to which the use can be reasonably restricted or when the social benefit from the activities outweighs the impact on neighbours.

In respect of existing community uses clearly they do not increase noise level at the times of operation however they would in future be in addition to the impact from a new school. If the proposal also involves a significant expansion of community use of the site then this needs to be addressed and assessed and further details should be provided to clarify exactly what uses are proposed and when including a 'worst case' maximum use. If the intention is to make available the sports facilities for hire then this is a different prospect and arguably unnecessary to the successful operation of a school and could theoretically imply noisy activities every evening and all day every weekend and holiday which would be a different level of impact entirely.

Additional comments:

The acoustic report covers mitigation as per NPPF p.123 requirement to 'mitigate and reduce to a minimum other adverse effects..'. The revised acoustic report 'Bullers Wood Free School, Bromley – Environmental Noise Survey and Assessment' has not included a scheme of mitigations. The previous comments that mitigations are required to minimise adverse effects in accordance with NPPF still stand.

It may be possible to mitigate and minimise further through use of carefully placed acoustic barriers such as fencing around the boundary or specific sports fields or the car park but the consultant would need to advise on the value or effectiveness of this in this case based on their own assessment. In some cases this can be uneconomic or of very marginal benefit. As a minimum I would suggest that a condition is attached to restrict use of playgrounds and outdoor sports facilities to 8am -7pm Monday to Fridays. You could also attach a condition to prevent hire of facilities for use by other parties to restrict use to essential school activities only and prevent any noise at weekends.

There appears to be no changes to the acoustic report with regards to the recommendations and doesn't appear to have been revised. Whilst there are existing uses on site, which exceed the hours recommend as a condition, the school intensifies the use of the site throughout the day, which in conjunction with evening and weekend activities would adversely impact upon nearby residents, it would be beneficial for the applicant to consider mitigations for this and whether these are cost effective to the gain in order to adequately weigh this against the community benefit.

As no flood lighting is proposed the community benefit from use of external facilities is limited throughout the year anyway, therefore the main benefit comes from use of internal facilities such as the sport hall which would not be restricted by the above condition, though I would recommend that an acoustic barrier to the main car park is considered. Unless the applicant is willing to consider other mitigations then I would still recommend that the use of outdoor space is restricted."

Drainage:

“Reviewing the submitted FRA I note in paragraph 7.8 surface water will be stored in the sub-base of the lower car park before it infiltrate into the soil. The pavement for the car park will discharge to the sub-base which consists of gravel. The driveways will discharge to swales. I can confirm that the above strategy is acceptable subject to detailed design and an appropriate surface water condition.”

Thames Water:

“Waste Comments - Thames Water would advise that with regard to sewerage infrastructure capacity, we would not have any objection to the above planning application subject to informatives in respect of groundwater discharge requirements and petrol/oil interceptors to parking areas.

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. In respect of surface water it is recommended that 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. A condition needs to be imposed in this regard.

Water Comments: On the basis of information provided, Thames Water would advise that with regard to water infrastructure capacity, we would not have any objection to the above planning application subject to an appropriate informative regarding water pressure.”

Natural England:

Natural England has no comments to make on this application. The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment.”

Historic England (Archaeology):

“Recommend approval subject to a condition as the above planning either affects a heritage Asset of archaeological interest or lies in an area where such assets are expected. Although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a condition could provide an acceptable safeguard. A condition is therefore recommended to require a potential two-stage process of archaeological investigation and possible mitigation. A limited programme

of trail trench elevation is therefore recommended and that the archaeological interest should therefore be conserved by attaching a condition to secure the implementation of a programme of archaeological evaluation and mitigation.”

Greater London Authority (GLA):

Conclusions: “*London Plan policies on principle of land use: provision of school on playing fields, community use, urban design, inclusive access, sustainable development/energy, flood risk management and transport are the key strategic issues relevant to this planning application. The application does not comply with the London Plan; the following changes might, however, remedy the current deficiencies, and could possibly lead to the application becoming compliant with the London Plan:*

Principle of land use – provision of school on playing fields and open space: *The partial loss of playing fields and open space is a strategic concern. The applicant and the Council should submit a robust and comprehensive site search, including options of co-location with other existing schools, and an educational needs case specific to this location. The applicant also needs to demonstrate that the existing playing field use does not meet an identified need in order to justify its loss.*

Playing fields and community use: *A community use plan that demonstrates the extent of the proposed community use of the School’s facilities should be secured by the Council.*

Urban Design: *Further clarification is required in relation to access arrangement, repositioning of the pupils entrance, and appearance of the sports block. The Council is encouraged to secure key details of facing materials to ensure a high quality school building is delivered.*

Inclusive design: *Further details on accessible car parking and internal accessible arrangements, including lift provision, is required to ensure the development complies with policy 7.2 of the London Plan.*

Sustainable development-energy: *Further clarification is required with regards to energy efficiency, district heating network and site heat network, floor area and location of the energy centre, detailed roof layout for the proposed PV installation. The short fall in carbon dioxide reductions, equivalent to 18 tonnes of CO2 per annum, should be met off-site.*

Flood risk Management: *The proposal complies with policies 5.12 ‘Flood Risk’ and 5.13 ‘Sustainable Drainage’ of the London Plan. All the proposed measures should be secured.*

Transport: *The proposal would be unlikely to result in an unacceptable impact to the TLRN; however given that a number of the pupils would be expected to travel by bus the arrival and departure times of the proposed school should be staggered with surrounding schools to alleviate the likely impact on bus capacity. Further discussions regarding the detailed design of the bus stops and shelters located on Bickley Road should be held between the applicant*

and TfL. Electric vehicle charging points should be delivered, the level of cycle parking should be increased and the school travel plan will need to be updated and monitored to ensure consistency with London Plan transport policies.”

Planning Policies

In determining planning applications, the starting point is the development plan and any other material considerations that are relevant. The adopted development plan in this case includes the Bromley Unitary Development Plan (UDP) (2006) and the London Plan (March 2015). Relevant policies and guidance in the form of the National Planning Policy Framework (NPPF), National Planning Practice Guidance (NPPG) as well as other guidance and relevant legislation must also be taken into account. The draft Bromley Local Plan is also a consideration of limited weight.

Unitary Development Plan (2006)

BE1 Design of New Development
BE13 Development Adjacent to a Conservation Area
BE16 Archaeology
G8 Urban Open Space
L6 Playing Fields
C7 Educational and Pre-School Facilities
C8 Dual Community Use of Educational Facilities
NE3 Nature conservation and Development
NE5 Protected Species
NE7 Development and Trees
T1 Transport Demand
T2 Assessment of Transport Effects
T3 Parking
T6 Pedestrians
T7 Cyclists
T17 Servicing of Premises
T18 Road Safety
IMP1 Planning Obligations

London Plan (March 2015)

2.6 Outer London: vision and strategy
3.16 Protection and enhancement of social infrastructure
3.18 Education Facilities
5.0 Overheating and cooling
5.2 Minimising carbon dioxide emissions
5.3 Sustainable design and construction
5.7 Renewable energy
5.6 Decentralised energy in development proposals
5.8 Innovative energy technologies
5.10 Urban Greening
5.11 Green Roofs and Development Site Environs
5.12 Flood Risk Management

5.13 Sustainable Drainage
6.3 Assessing effects of development on transport capacity
6.9 Cycling
6.13 Parking
7.2 An inclusive environment
7.3 Designing out crime
7.4 Local character
7.5 Public Realm
7.6 Architecture
7.8 Heritage assets and archaeology
7.13 Safety, security and resilience to emergency
7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes
7.21 Trees and woodlands
8.1 Implementation
8.2 Planning obligations

National Policy:

National Planning Policy Framework (NPPF) (2012): Most relevant sections include:

Paragraph 14: Achieving sustainable development
Para 17: Core planning principles
Paras 29 - 41: Promoting sustainable transport
Paragraph 32: Highway impacts
Paras 56 – 66: Requiring Good Design
Paras 69-78: Promoting healthy communities
Paragraph 72: Delivery of school places
Paragraph 74: Playing fields
Paras 93-103: Meeting the challenge of climate change & flooding
Paras 109-125: Conserving and enhancing the natural environment
Paras 188-195: Pre-application engagement
Paras 196-197: Determining applications
Paras 203-206: Planning conditions and obligations

National Planning Practice Guidance (NPPG)

Communities and Local Government and Education “Policy statement – planning for school development” - August 2011 (the London Plan para 3.98 (supporting text to Policy 3.18 Education Facilities) sets out that the Mayor’s approach reflects this joint policy statement).

Sport England Planning Policy Statement – A Sporting Future for the Playing Fields of England is also relevant.

Bromley’s Proposed Submission Draft Local Plan:

The emerging Local Plan has completed its final consultation stage in December 2016. It is expected the Examination in Public will commence in 2017. The weight attached to the draft policies increases as the Local Plan

process advances. These documents are a material consideration and weight may be given to relevant policies as set out in the NPPF paragraph 216 which states:

“From the day of publication, decision-takers may also give weight to relevant policies in emerging plans according to:

- the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);*
- the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*
- the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).”*

Current draft Policies relevant to this application include:

Policy 21 Opportunities for Community Facilities
Policy 27 Education
Policy 28 Educational Facilities
Policy 29 Education Site Allocations
Policy 31 Relieving Congestion
Policy 32 Road Safety
Policy 33 Access to services for all
Policy 34 Highway Infrastructure Provision
Policy 37 General Design of Development
Policy 40 Other Non-Designated Heritage Assets
Policy 42 Development adjacent to Conservation Areas
Policy 46 Archaeology
Policy 55 Urban Open Space
Policy 58 Outdoor Sport, Recreation and Play
Policy 70 Wildlife Features
Policy 72 Protected Species
Policy 73 Development and Trees
Policy 75 Hedgerows and Developments
Policy 113 Waste Management in New Development
Policy 115 Reducing flood Risk
Policy 116 Sustainable Urban Drainage Systems
Policy 118 Contaminated Land
Policy 119 Noise Pollution
Policy 120 Air Quality
Policy 121 Ventilation and Odour Control
Policy 122 Light Pollution
Policy 123 Sustainable design and construction
Policy 124 Carbon reduction, decentralised energy networks and renewable energy
Policy 125 Delivery and implementation of the Local Plan

Draft Local Plan documents of specific relevance are also:

Local Plan Education Background Document September 2015

In addition the Bromley Primary and Secondary Schools Development Plans (January 2015 and January 2016) are relevant.

Planning History

87/03685/LBB: Indoor sports complex, single storey maintenance building and relocation of ATC building (OUTLINE) – Withdrawn

92/01032/FUL: Detached single storey building for sports store – Permitted 1.7.1992

95/02264/FULMAJ: Part one and two storey buildings for tennis and leisure centre with basement car parking landscaping and relocation of vehicular access to Bickley Road – Refused 14.11.1996 and appeal dismissed 12.3.1997

02/01003/FULL1: Boundary fencing facing Bickley Road – Approved 08.05.2002

16/03315/EIA: EIA Screening Opinion for 6FE Secondary School – EIA not required

Various applications for works to trees – approvals.

Permission was dismissed at appeal for a tennis and leisure centre in 1997 (95/02264/FULMAJ) primarily on the basis of the loss of open space and protected trees, however whilst this decision is a material consideration, it is only of limited weight given its age and the differences in the planning considerations relevant to the current proposal, which must be considered on its own merits as set out in this report.

Conclusions

It is considered that the main planning issues relating to the proposed scheme are as follows:

- Principle of Development
 - Compliance with Urban Open Space (UOS) policies
 - Educational Policy
 - Educational Need
 - Site Selection Process
 - Playing Fields and Sports Pitches
- Playing Fields and Sports Pitches
- Highways and Transport
- Design, Layout, and Scale
- Residential Amenity
- Trees and Landscaping

- Temporary Accommodation and Phasing
- Contributions
- Other Technical Issues

Principle of Development

- Urban Open Space

The application site comprises playing fields for Bullers Girls School, disused tennis courts, a wooded area, an Air Cadets building and Pavilion and is designated in the UDP as Urban Open Space. For the purposes of this application, the up to date development plan comprises the Unitary Development Plan (saved policies), the London Plan and the NPPF. In the first instance the application will be considered in the light of these policies. The weight and relevance attached to policies in the Proposed Submission Draft Local Plan is more limited but is a material consideration in the determination of the application as set out in paragraph 216 of the NPPF. The most relevant policy for this section is UDP Policy G8 which relates to development in Urban Open Space and states the following:

Proposals for built development in areas defined on the Proposals Map as Urban Open Space (UOS), will be permitted only under the following circumstances:

- (i) the development is related to the existing use (in this context, neither residential nor indoor sports development will normally be regarded as being related to the existing use); or*
- (ii) the development 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 the existing development on the site.*

Where built development is involved; the Council will weigh any benefits being offered to the community, such as new recreational or employment opportunities 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 supporting text of this policy advises that UOS is locally important public or private open space identified by individual Councils that needs protection. The identified Urban Open Spaces are considered to be of local significance as they fulfil a specific function in their localities, such as providing important breaks in the urban area. The primary purpose of the policy is to protect the open character of the UOS.

Assessing the proposed development solely against the requirements of the UDP Policy G8, it is considered that the current proposal would be contrary to the policy.

In the supporting statements and the additional information submitted the applicant sets out their view that the 2006 UDP Policy is out of date and that paragraph 14 of the NPPF sets out the approach to decision-making when a plan is out of date and for decision-making this means granting permission unless there are any adverse impacts of doing so which would significantly and demonstrably outweigh the benefits. The considerations when reaching a conclusion on this aspect are the educational need in the Borough, the availability of alternative sites, the emerging development plan and the community benefits of the development. This needs to be assessed against the impact on the local environment, residential amenities and the transport and traffic impacts of the development.

UDP Policy G8 is not considered out of date as it accords with Policy 7.18 of the London Plan. The main consideration identified under Policy 7.8 is the protection of locally designated open space stating that *'the loss of protected open spaces must be resisted unless equivalent or better quality provision is made within the local catchment area. Replacement of one type of open space with another is unacceptable unless an up to date needs assessment shows that this would be appropriate.'*

The applicant has not supplied a formal up to date needs assessment to demonstrate that the replacement of one type of open space with another can be justified (or playing pitch provision in the area). Consequently the lack of a needs assessment makes it difficult to conclude that the proposed development is policy compliant in respect of Policy 7.18 of the London Plan.

Therefore assessing the proposed development solely against the requirements of London Plan Policy 7.18, it is considered that the current proposal would be contrary to this policy.

The Proposed Submission for the Draft Local Plan (Nov 2016) indicates the Council's view of the way forward for this policy. Under paragraph 216 of the NPPF the emerging Local Plan carries some weight dependent upon the stage of preparation, the extent to which there are unresolved objections and the degree of consistency with the NPPF. At this stage it is considered some weight can be attached to emerging Local Plan Policies.

The emerging Local Plan has taken the unusual step of amending existing UOS policy to reflect the urgent need for the Borough to find school places for pupils in the Borough. The draft policy increases the flexibility for school expansions on UOS sites in existing education use or allocated for education use in the Local Plan and relates this directly to policy support where there is a demonstrable need for additional education buildings.

Draft Policy 55 states:

Proposals for built development in Urban Open Space (UOS) will be permitted only under the following circumstances:

a - *The development is related to the existing or allocated use (in this context, neither residential nor indoor sports development, other than sports*

development related to educational use on the site, will normally be regarded as being related to the existing use); or

***b** - The development is small scale and supports the outdoor recreational uses or children's play facilities on the site; or*

***c** - Any replacement buildings do not exceed the site coverage of the existing development on the site.*

Subject to the clauses above, where built development is involved; the Council will weigh any benefits being offered to the community, such as new recreational or employment opportunities, against a proposed loss of open space.

Where there is a demonstrable need for additional educational buildings sensitive design and siting will be sought to ensure that the impact on the open nature of the site is limited as far as is 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.

It is considered that the proposed new build development to provide a secondary school, would comply with this draft policy. In addition, given the scale of the building and associated development, the proposal minimises the harm to the open nature and character of the site with the retention of all the existing playing field area and retention of most trees.

There is a Draft Allocation for this site in the emerging Local Plan, which identifies the site as a location for a 6FE secondary school, however this can only be afforded limited weight in the overall planning balance at this stage given its draft status.

The use of this site for a school use, whilst retaining its UOS designation as identified in Draft Policy 55, is also considered to be benefit to the use of other sites that may be situated in the Green Belt or on Metropolitan Open Land, due to the limited availability of sites for schools within the Borough. This has been identified through a Borough wide assessment site selection process which has been used to inform the Draft Local Plan and the Draft allocation for a school on this site.

- Educational Policy

The Education Act (2011) places a statutory duty on Local Authorities to provide sufficient pupil places for every child of school age in their local area and keep this under review. The Academies Act (2012) changed the approach to educational provision and encourages the establishment of new Free Schools. The Borough recognises the need to prepare overall strategies to meet the current and future supply of Primary and Secondary School places, with Bromley experiencing a particular growth in demand for school places from increases in birth rates and migration.

The NPPF was preceded in August 2011 by a joint ministerial policy statement on planning and education “Policy statement – planning for schools development” which 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”. It sets out the Government’s commitment to support the development of state-funded schools and their delivery through the planning system. In summary it identifies the following:

The Government is firmly committed to ensuring there is sufficient provision to meet growing demand for state-funded school places, increasing choice and opportunity in state-funded education. State-funded schools include Academies and free schools. The Government wants to enable new schools to open, good schools to expand and all schools to adapt and improve their facilities. This will allow for more provision and greater diversity in the state-funded school sector to meet both demographic needs and the drive for increased choice and higher standards. Creating free schools remains one of the Government’s flagship policies. It is the Government’s view that the creation and development of state-funded schools is strongly in the national interest and that planning decision-makers can and should support that objective, in a manner consistent with their statutory obligations. The planning system should operate in a positive manner when dealing with proposals for the creation, expansion and alteration of state-funded schools, and that the following principles should apply:

- There should be a presumption in favour of the development of state-funded schools, as expressed in the NPPF.
- Local authorities should give full and thorough consideration to the importance of enabling the development of state-funded schools in their planning decisions. The Secretary of State will attach significant weight to the need to establish and develop state-funded schools.
- A refusal of any application for a state-funded school, or the imposition of conditions, will have to be clearly justified by the local planning authority. Given the strong policy support for improving state education, the Secretary of State will be minded to consider such a refusal or imposition of conditions to be unreasonable conduct, unless it is supported by clear and cogent evidence.

Paragraph 72 of the NPPF identifies that the government attaches great weight to the need to create, expand or alter schools and says that Local Planning Authorities should work with school promoters to identify and resolve key planning issues at an early stage, while Paragraph 73 of the NPPF says that access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of Communities.

The London Plan in Policy 3.18 - Education Facilities supports proposals which enhance the expansion and provision of educational facilities including new build, expansion of existing or change of use to educational purposes. Those which address current and projected shortages of primary school places will be particularly encouraged. The London Plan para 3.98

emphasises the strength of this positive consideration and refers to the joint policy statement on Planning for Schools Development (Aug 2011).

Chapter 13 of the UDP sets out the Council's objectives in supporting the provision of local community services. Policy C1 of the UDP states that proposals for development that meet an identified education need in the Borough will normally be permitted provided it is accessible by modes of transport other than the car and accessible to members of the community it is intended to serve. Policy C7 of the UDP identifies that new or extensions to existing educational establishments will be permitted provided that they are located so as to maximize access by means of transport other than the car and are required to prepare a School Transport Plan. These policies represent the adopted Development Plan policies in respect of education provision.

The emerging Local Plan has been developed on the basis of the evidence base, including an Education Background Paper (Sept 2015) which set out the educational need on the basis of the Council's update of "Planning for Growth – Review of Secondary Education", and undertook an extensive site search of the full range of potential sites, including existing education sites, vacant social infrastructure sites and all sites submitted through the Local Plan "Call for Sites" process, along with sites identified by proposed Free School providers. On the basis of the evidence base the Council consulted on proposed allocations to meet educational needs in the Draft Allocations, Further Policies and Designations Document 2015. This consultation included St Hugh's Playing Field as a proposed allocation for a secondary free school. The Draft Local Plan was approved for consultation at Executive Committee on July 2016 and retains the proposed allocation at St Hughes Playing Field. The evidence base has been recently updated and published in the draft Education Policy Background Paper.

In response to increasing pressure for school places and the emphasis on the need to ensure sufficient places in the London Plan and the NPPF the Proposed Submission Draft Local Plan includes three draft education policies. These are:

Draft Policy 27 – Education - advises that the Council will assess the need for education infrastructure and allocate sites accordingly by safeguarding education sites for the plan period. It identifies *"In all cases new development should be sensitively designed to minimise the footprint of buildings and the impact on open space particularly playing fields, as well as seeking to secure, as far as possible the privacy and amenities of any adjoining properties, whilst delivering the necessary educational infrastructure."*

Draft Policy 28 – Educational Facilities - supports proposals for new educational facilities which meet local need, looking first at opportunities to maximise the use of existing education land. It states:

"The Council will support proposals for new educational facilities which meet local need, looking first at opportunities to maximise the use of existing Education Land or redundant social infrastructure."

Where new sites are required, proposals will be permitted unless there are demonstrably negative local impacts which substantially outweigh the need for additional education provision, which cannot be addressed through planning conditions or obligations, and subject to:

- i. open space and conservation policies*
- ii. the need for the provision locally,*
- iii. highway safety, and*
- iv. the accessibility of the site by means of transport other than the car.*

In all cases new buildings should be sensitively designed to minimise the footprint, loss of open space and the impact of development, seeking to secure as far as possible the privacy and amenities of any adjoining properties, whilst delivering the necessary educational infrastructure.

Proposals involving the sharing of facilities, including open spaces, between educational facilities, and / or the dual use of educational facilities by the wider community will be encouraged.”

Draft Policy 29 – Education Site Allocations – allocates a number of new school sites for primary and secondary education. It states:

“Subject to Local Plan Policy 27 ‘Education’ the Council will seek to meet the need for education provision over the Local Plan period as identified in the Council’s Primary and Secondary School Development Plans, by allocating sites for educational purposes and re-designating school sites in Green Belt and Metropolitan Open Land as Urban Open Space...

a –allocating the following sites for new/enhanced education provision:

- 1 Westmoreland Road*
- St Hughes Playing Field, Bickley Road*
- Land at Bushell Way, Chislehurst (note: this is for a primary school),
and*
- Kentwood Site, High Street, Penge*

b - allocating sites for new education provision, removing them from the Green Belt or Metropolitan Open Land and re-designating them as Urban Open Space, safeguarded as ‘Education Land’ for education development only.....

c- Removing areas within the following existing school sites from Green Belt or Metropolitan Open Land and re-designating them as Urban Open Space, safeguarded as ‘Education Land’ for education development only....

Planning applications will be required to provide robust assessments of the impacts of development, including for example, highway implications, and provide appropriate mitigation to address adverse impacts.

The principle of the provision of new schools is therefore well established in planning policy from a National to a Borough level. The site would offer an option for education facilities that fulfil an identified need.

Therefore proposals for new schools should be given positive consideration and should only be refused where there are demonstrable negative 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.

- Educational Need

The most recent update of the Secondary School Development Plan, and reflected in the updated Education Background Paper, was agreed by the Council (Portfolio Holder) in January 2016, indicating the need for 17 additional forms of entry required for 2018/19 which is to be addressed by the expansion of Bishop Justus and the opening of two new schools (one being Bullers Wood Boys School), both of which are currently without permitted sites. Bullers Wood Boys School has been approved by the Secretary of State for Education to open a Secondary School sharing some functions with Bullers Wood Girls.

If both secondary Free Schools were able to secure permission and open in temporary accommodation in September 2017 the projections from the Secondary School Development Plan 2015 – 2018 still indicate an outstanding need of 95 places (3FE) by 2018/19, rising to 311 (10/11FE) in 2019/20.

Without Bullers Wood School the shortfall by 2019/20 is projected at 491 (16/17FE). Without both Bullers Wood School and the other secondary Free School currently seeking planning permission (Eden Park High School) on this Agenda, the shortfall experienced over the last couple of years, resulting in the provision of bulge classes, will increase resulting in a projected shortfall of 731 places (24FE or 3 x 8FE new schools) by 2019/20.

In addition to the two proposed Free Schools mentioned above there is Ministerial approval for the opening of a University Technical College (UTC) which has been altered to take in students from 11yrs, thus, subject to a planning application being submitted and agreed this provision will contribute to the need for secondary provision, however the timeframe to meet the need, as identified above, is extremely short.

Similarly there are other sites identified within the emerging Local Plan to meet the need over the Local Plan period but no further applications have been made to the Secretary of State to open free schools on these sites and as such they are unlikely to be able to provide for the need within the next couple of years

The figure of up to 34 FE within the Council's Secondary School Development Plan 2016 is based on birth rates and school census information. This figure is based on the 5% that the Pupil Places Working Group agreed should be

added to the base GLA school roll projections to provide a contingency for fluctuation in growth and parental choice. The 34FE relates to 1,022 Year 7 places required in 2022 compared with the base school population in 2014/15.

According to the 2016 Summer School Census there are currently 1,292 places vacant across the whole of secondary sector (ages 11-19). This equates to about 5% of total places. However, Year 7 only have just over 150 places free. These 1,292 vacant places are spread across all years including sixth form, so these are not places that could automatically be offered as Year 7 places. Furthermore, based on all years, 9 existing secondary schools are already over capacity and need to adjust their intake to their respective capacity.

The ongoing growth in demand for secondary school places is also indicated by having proportionally fewer places available in Year 7 than Year 11. In Year 7 there are 160 spare places across the Borough, but these spare Year 7 places are in the east of the Borough (Kemnal & Priory) masking the shortfall in the Northwest & Centre of the Borough where the demand is highest. According to the GLA 2015 Pupil Roll Projections there is an estimated increase in demand of 5,444 11-18 age secondary places between 2016 and 2024. If you subtract the 1,292 places currently surplus within Bromley Schools as indicated by the Summer 2016 School Census, this suggests that there is currently deficit of 4,152 places by 2024. This equates to a shortfall of 138 classes.

In addition, a 5% allowance for parental choice (recommended in guidance and agreed by the Council's school place working group) would add a further 6FE. The Council's School Admissions team are reporting 200 additional admissions for 2017 - close to the GLA predicted 204 deficit, and late applications can be anticipated which may increase this further. It is clear from analysis that Bromley needs an additional 2 functioning secondary schools by Sept 2018, to provide an 11 or 12 FE deficit which allows no allowance for parental choice.

There is, therefore, a recognised and strong case of educational need within the Borough that is required to be met, as required by current pupil place legislation.

The decision "not to contest" the planning appeal submitted against non-determination for temporary provision for the Eden Park Academy to provide 6FE on Ravensbourne School, along with the permitted 2FE expansion at Bishop Justus addresses the deficit for Sept 2017, albeit in the short term only. At the time of writing this report, the Council has not received the Inspectors formal decision on this appeal.

The Applicant in their submissions have also outlined this need and although this may be set out in a different format, the same evidence base and statistics has been used to set out their position and the case of need for educational sites and a free school on this site to serve the Borough. The

case of need submitted is therefore considered to address the requirements identified by the GLA in their Stage 1 referral letter.

The Council has a statutory duty to secure sufficient school places under the Education Act (1944) and this is a pressing concern which from a planning perspective would be a material consideration. The NPPF para.72 and Aug 2011 joint ministerial statement also require Local Planning Authorities to give significant weight to the need to create schools. This is reflected in The London Plan (2016) Policy 3.18 and draft Local Plan Policy 28 “Education Facilities” which require that proposals for new schools should only be refused where there are demonstrable negative local impacts which substantially outweigh need for the provision and which cannot be addressed through the appropriate use of planning conditions or obligations.

Whilst the site is allocated for secondary education within the draft Local Plan it is contrary to the adopted UDP Urban Open Space policy. The NPPF para 216 advises that the emerging Local Plan carries some weight dependent upon the stage of preparation, the extent to which there are unresolved objections and the degree of consistency with the NPPF.

Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The Planning Practice Guidance advises that *“it is for the decision maker to decide what weight is to be given to the material considerations in each case, and (subject to the test of reasonableness)”*.

In considering the balance to be made in respect of material considerations it is important to note that:

- the “great weight” that the NPPF attaches to the need to create, expand or alter schools.
- the policies and allocations in the Draft Local Plan propose to address the imminent shortage of secondary school places highlighted within the Secondary Schools Development Plan
- the lack of alternative provision, evidenced within the Local Plan Education Background Paper, capable of delivery within the necessary timeframe, to meet the statutory duty under the Education Act to secure sufficient school places.

The Education Department have set out the key implications for education provision in Bromley, as follows:

- We have a serious issue around meeting our statutory sufficiency duty from September 2017 unless the supply of school places is increased.
- If nothing is done there will be a deficit of 702 places or 23 FE [per year] in 2022. This level of increase matches the quantum of increase in pupils that has been experienced in the primary sector.
- There will be a 6 or 7FE deficit September 2017. Even if Bishop Justus goes to 8FE in September 2017 (this is the only scheme that currently

has planning permission) there is still a need for at least one of the proposed Free Schools to open. This is particularly the case as surplus places in existing schools will continue to be focussed in the East of the Borough whilst growth is in the West and Centre.

- Due to the level of need, in March 2017 we are unlikely to be able to offer every child a place through the co-ordinated admissions process even if the 2 Free Schools open. This problem will be exacerbated if neighbouring Boroughs are unable to offer additional places as in previous years.
- Admissions are currently reporting around 200 additional applications for secondary school places for September 2017, and this is before late applications are considered.

Objectors have raised concerns that other secondary schools within the Borough have capacity or are wishing to reduce their intake, however this is not supported by the Council's Education Officers and would compound the need for places as set out above.

There is therefore policy support nationally, regionally and in the draft Local Plan for the provision of necessary school places. The demonstrable need for places and the emerging Local Plan are material considerations to the overall determination of the planning application.

- Site Selection Process

The Proposed Submission Draft Local Plan, as outlines above, has gone through a process of evidence based assessment and an extensive site selection process to identified sites that could be available for expansion of existing schools and new school sites to address the need for primary and secondary school places due to rising birth rates. This evidence and the site selection process have been agreed and accepted by the Council Education Select Committee and approved by the Education Portfolio Holder on behalf of the Council.

The Secondary Schools Development Plan (2016) indicates a need for an additional 34 FE by 2022, with almost half required by September 2018. To date 2FE have been permitted.

Secondary school catchments are significantly larger than for primary schools which enable expansions at existing schools. However, in providing secondary school places the local authority needs also to satisfy the statutory requirement to provide a reasonable offer, including consideration of the travel distance and times for a child to access a school place.

To address the emerging need for additional school places the Council has undertaken a sequential approach in two stages, firstly the assessment of the capacity of existing education sites, redundant social infrastructure and other policy compliant sites and secondly a policy alteration to increase the flexibility of Urban Open Space (UOS) in respect of the expansion of existing educational facilities.

However, this is not sufficient to address the identified need and therefore it has been necessary to redesignate existing school sites from Green Belt and Metropolitan Open Land (MOL) along with specific site allocations. The sequential approach to meeting the projected need, has involved an assessment of the full range of potential sites. The Local Plan Draft Policies and Designation consultation document (Feb 2014) involved a call for sites. All sites were subsequently assessed where appropriate for their potential to address the education need, along with sites identified by proposed Free School providers and other vacant education and social infrastructure sites. The demonstrable absence of alternative sites presents exceptional circumstances to justify assessment of potential educational sites in the GB and MOL for expansion and for new specific education allocations.

Initially sites were grouped relating to existing strategic policy constraints. Only Group 1 sites could offer compliant opportunities. Sites in each group were assessed in line with the approach to social infrastructure and specifically education, set out in London Plan Policies 3.16 and 3.18 and ranked. The individual merits and recognised material considerations relating to each site were then assessed against local planning policy. Preferable sites were then considered by the Local Development Framework Advisory Panel in order to bring forward recommended site allocations for the draft Local Plan.

The assessment findings set out sites with the potential to deliver the education provision through policy compliant sites or through redesignations which cause least harm to the GB and MOL in line with the NPPF and as required by the Mayor. Group 1 sites have been identified which could potentially facilitate some expansions to schools over the Local Plan Period and two sites for new schools. These sites are insufficient to address the projected need and it is therefore necessary, on the basis of the site rankings, to increase the flexibility of the Council UOS policy in relation to education development for existing schools. This proposed increased flexibility to the UOS policy produces another three sites ranked A with potential for expansion. Collectively the A ranked sites are insufficient to address the need outlined in the approved School Development Plan 2016 and it is therefore necessary to assess the potential of other sites.

Whilst school expansions contribute significantly to meeting the education need over the plan period much of the need will be met through the provision of new 'Free Schools'. Collectively the three earlier ranked groups were unable to deliver sufficient new sites hence the assessment of the Group 4 sites. This group includes two ranked B sites, being St Hughes Playing Fields and one which is designated Green Belt.

Following the GLA's Stage 1 response which identified a need for the applicant to demonstrate why shortages cannot be addressed on alternative sites and to undertake a site search, the Applicant has also undertaken a site assessment process of all potential sites within a 5 mile radius from the application site which includes all development land of 4-10 acres or existing buildings of 70,00ft². The search includes and has identified all 'on market'

opportunities or development land and has had regard for 'off-market' land, including Bromley's employment land clusters, natural green space, parks and outdoor sports sites that meet the above parameters. The sites have been assessed according to their suitability, resulting in the selection of the preferred option.

This process identified a preferable site in Chelsfield which is situated in the Green Belt and a Conservation Area where new development is likely to be resisted in line with planning policies. The assessment identified 12 further potential sites in the Green Belt, 1 in Metropolitan Open Land, 2 sites sited within an Area of Nature Conservation Importance, 2 allocated housing sites that are currently being developed, The Widmore Centre and Balmoral Avenue (Beckenham Academy) both of which are already being brought forward for other Free Schools.

This further identifies that alternative sites for a new school are limited within this part of the Borough and in all cases have restrictive designations that policies seek to preserve or are allocated for housing or other schools. The deliverability of other sites for new schools is therefore restricted and the need for the application site for a school has been identified. The site selection process has therefore been rigorously considered by both the Council in the development of its emerging Local Plan and the Applicant in support of the application. The GLA's Stage 1 comments have therefore partially been addressed through the site selection process and are considered further in the educational need justification put forward by the applicant and discussed in the next section.

Playing Fields and Sports Pitches

The NPPF para.74 and the London Plan Policy 3.19 preclude the loss of open space, sports and recreational land, including playing fields and wherever possible, multi-use public facilities for sport and recreational activity should be encouraged. Policy L6 of the UDP seeks to protect the loss of playing fields unless an assessment of open space provision reveals a surplus any deficiency could therefore be off-set against existing provision or re-provision. Draft Policy 58 also seeks suitable demonstration of existing pitch facilities and the re-provision to a higher quality if facilities are lost. NPPF para. 74 states that existing open spaces and playing fields should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

London Plan Policy 3.19 identifies that proposals which increase or enhance the provision of sports and recreation facilities will be supported; whereas

those that result in a net loss of sports and recreation facilities, including playing fields should be resisted

The overall site forms a playing field, as defined in legislation and detailed plans showing the existing and proposed sports provision have been provided with the application. The site currently provides a small grass running track, long jump, 3 hard surfaced tennis courts (disused), 6 grass tennis courts (disused), and 3 sports pitches for on the site. These are used by Bullers Wood Girls School, the Air Cadets and for football coaching.

The proposed scheme following redevelopment will retain the 3 sports pitches and the majority of the immediate surrounding area around the pitches and a 100m running track. The school building will be constructed on the disused tennis court area and will provide a 4 court sports hall and two external hard surfaced multi-use games areas (MUGA's) which are large enough for two small pitches.

Sport England have made representations in respect of the application being a Statutory Consultee. They have raised a statutory objection to the proposal on the basis of a loss of part of the overall playing field area (in physical and functional terms), which includes the area to the south east of the trees which has been marked out for playing pitches in the last five years and the area to the north east which currently is not marked out for pitches. These are the two areas of the disused tennis courts and Sport England classifies these areas as part of the whole area of playing field. In addition, the bin store and sub-station are proposed to be built on the part of the playing field which contains a football pitch.

The applicants have been in discussion with Sports England and have put forward the view that tennis courts are not included in the definition of a playing pitch as identified in Sport England's 'Planning Policy Statement – A Sporting Future for the Playing Fields of England'. The 3 main sports pitches will be retained on site and are unaffected and is therefore in accordance with Exception Policy E3 of Sport England's requirements. Furthermore the proposed scheme incorporates a new 4 court Sports Hall and 2 MUGA's which will re-provide any provision which Sport England consider is lost through redevelopment and complies with Sport England Exception Policy E5 in that the nature of the proposals and sports offer included should be set against the quality of the provision being lost and that "the proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing fields".

Sport England have, however, maintained their objection and have expressed the view that the proposed development results in the loss of playing fields and does not meet any of their Exception Policies. Such an objection therefore requires the application to be referred to the National Planning Casework Unit if it was to be the intention of the Local Planning Authority to grant planning permission.

Sport England has further stated that a potential way forward would be to propose a community size 4 court sports hall (34.5 x 20m) and position the MUGA's side by side with fencing and lighting. In addition, if the Council were minded to approve the application a condition is recommended that requires a community use agreement to be prepared and approved to secure community access to the sports facilities.

The GLA identified some concern in respect of the loss of playing fields and playing pitch provision on the site which will result in the overall loss of playing fields and wish to see the demonstration that Sport England, London Plan and NPPF policies are met in full. They have also highlighted the need for the site to comply with Policy 3.18 of the London Plan in respect of the use of school sites for community use and the production of a community use plan to demonstrate the extent of proposed community use of the facilities which can be secured.

The applicants have subsequently submitted a Community Use Statement which identifies the type of additional community uses the site could accommodate. This includes the existing community users of the site and the potential after school hour uses the site could accommodate on the sports field, sports hall, dining hall and main hall as well as use of the other studios and classrooms. These uses would finish at 9.30pm with the use of the outdoor spaces during daylight hours only. In addition there is the potential for the use of the site on Saturdays and school holiday clubs.

In view of the above policy considerations and the facilities to be provided it is considered that although there is an overall loss of playing fields, this loss has been mitigated by the full retention of the existing playing pitches and the provision of the 4 court sports hall and 2 MUGA's, and that the proposed facilities are sufficient for the proposed school.

The sports hall and two MUGA's are partially proposed on the existing tennis courts. The provision of these facilities, that includes, two external 5 a side sports pitches is considered to be uplift in terms of the quality and quantity of pitch provision on the site, with no resulting loss of sports pitches. The Sports Hall will provide 4 further indoor courts and associated facilities which again is an uplift of the existing facilities, being disused tennis courts. This provision will therefore meet any deficiency and ensure pupils and the community benefit from high quality sports and the sport related benefits this facility will deliver both for the school and wider community. This is therefore considered to meet the policy requirements sufficiently, resulting in no net loss of pitches and further provision of sports and recreational facilities, as required under the above policies.

In terms of the use of the site for Bullers Wood Girls School, this will not be affected. The Girls School use the existing playing pitches but the disused tennis court area is not used. All these facilities will therefore be retained and changing facilities re-provided once works are complete. The Applicant has also identified how both schools will use the pitches during the school year with alternative use of the 'top and bottom field' for their sports curriculum.

The bin store and sub-station also extend onto the playing field area which is also contrary to playing field policies and Sport England's requirements, however, it has been demonstrated that this does not affect the laying out of the sports pitch and its use which are fully retained.

For these reasons, it is considered that there is no overall loss of playing pitch provision on the site, the use for Bullers Wood Girls School is fully retained and higher quality outdoor pitches and indoor sports courts are to be provided. This therefore accords with the fundamental principle of the policies which seek to resist any loss of playing pitches and playing fields. However, whilst the proposal involves alternative sports provision there remains an outstanding objection from Sport England.

The existing playing fields and the proposed MUGA's and Sports Hall are sited in relatively close proximity to a number of residential properties on Chislehurst Road and Pines Road. As will be discussed in detail in the report it is considered that the proximity of these dwellings does raise questions over the new facilities being suitable for use both within and outside of school hours due to the potential for noise and disturbance to these existing properties and their residential amenities. This is considered further later in this report.

It is likely that if an approval were to be recommended conditions could be imposed to control the use of the site for community purposes in the form of a community use agreement and further details of the proposed surface water drainage system, the proposed surface materials of the MUGA's, their fencing and hours of use of the site could all be dealt with by condition. Overall the matter of playing fields and sports pitches is considered acceptable.

Highways and Transport

The NPPF recognises that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability objectives. All developments that generate significant amounts of movement should be supported by a 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 in Paragraph 32 that development should only be prevented or refused on transport grounds where the residual cumulative impacts are severe.

London Plan and UDP policies encourage sustainable transport modes whilst recognising the need for appropriate parking provision. Policies T1, T2, T3 and T18 of the UDP are relevant and car parking standards within the UDP should be used as a basis for assessment. The requirements for car and cycle parking are laid out within Tables in the London Plan, as subsequently amended. In addition, the requirements of Policy 6.13 require that 1 in 5 spaces should provide electrical charging points. Consideration should also

be given to the location of the required 10% of wheelchair spaces and their proximity to entrances. Cycle spaces should also be provided under these policies.

The site is located in the triangle of land surrounded by Bickley Road, a London Distributor Route and the A222, Chislehurst Road, a Local Distributor and the B264 and Pines Road. There is an existing vehicular access from Bickley Road and there is also a pedestrian access in Pines Road to the site.

A number of documents relating to the potential highway impact of the proposals have been submitted in support of the application including a Transport Assessment (TA) (revised and updated since original submission), a stage 1 Road Safety Audit, a Draft Construction Management Plan (CMP) (also revised and updated since submission) and a Draft Travel Plan.

A detailed Transport Statement has been submitted which includes existing, proposed and predicted traffic flow data and counts, a Stage 1 Road Safety Audit, Parking Stress survey, traffic queue length surveys and traffic light timings. It identifies all aspects of the traffic implications of the proposals including vehicular and pedestrian routes, layouts, parking plans, swept path analysis, public transport availability and measures to minimise the need for the cars and encourage sustainable measures to encourage walking and public transport to the site for pupils and staff. It identifies that the school opening hours will be 7.45 – 14.15 with compulsory enrichment/homework sessions until 15.20 to minimise additional traffic at peak times.

In addition the applicant was requested during the course of the application to consider alternative access options into the site, particularly from Bickley Road. Details of potential alternative points of access on Chislehurst Road, Bickley Road and Pines Road have been put forward with the application including an assessment of their pros and cons. The applicant has discounted access from Bickley Road for a number of reasons which shall be discussed in more detail later in this report. An alternative access option for Chislehurst Road has been identified but has not been pursued further.

- Proposed Access Arrangements

The Proposed Development includes the provision of a new vehicular access on Chislehurst Road as the main entrance to the site. A one-way system through the site, utilising the existing road currently on the site, will provide a 10 space parent pick-up and drop-off area with a visitors parking area next to the school entrance for visitor and disabled car parking (11 spaces) and continuing through the site in a loop to a 58 car parking area for staff. The existing access on Bickley Road is being retained (largely in its current form) as the exit from the site. However service vehicles will enter and exit via Chislehurst Road with a delivery and turning area close to the new access. New separate pedestrian access points are also being proposed from Chislehurst Road and Bickley Road.

The new vehicular access proposed off Chislehurst Road has raised significant concerns regarding the impact of a new point of access, due to the

existing high volumes of traffic on Chislehurst Road, particularly at peak times, its narrow width (between 5-6m), lack of pedestrian footway, the safety of a vehicular access point for a large school in this location and the impact the additional traffic and cars will have on nearby residential properties. In addition a pedestrian access is proposed adjacent to the proposed vehicular access and small section of footpath and visibility splays. The impact this would have on the existing trees could be significant. A significant number of objections from local residents have been received raising such concerns.

A Stage 1 Road Safety Audit has been carried out on the proposed Chislehurst Road access. This has raised a number of issues with the proposed access. The main issues raised were visibility splays for both vehicles and pedestrians exiting the site, which will require the removal of trees and vegetation on a regular basis and continued maintenance, swept paths, potential parking at the access and the lack of footway. There is currently no footway along the south side of Chislehurst Road and the footpath on the northern side of the road is only 1.3m in width. A crossing point is also being proposed, rather than a footway, so there is unlikely to be sufficient width to cope with the number of pupils trying to use it. The advice in Manual for Streets is that footway widths in excess of 2m should be considered for areas around schools, and this will not be provided.

The proposal is for the main access to be from Chislehurst Road with the exit to Bickley Road. This has some merit in that it does spread any impact between the 2 roads. However, the Chislehurst Road access has raised a number of objections and issues raised in the Road Safety Audit. It is also highly likely that parents will drop off children on this side of the road and they could potentially end up walking in the road to the entrance. If they cross the road, the footway on the northern side is substandard. In the morning peak the pupils heading towards Bullers Wood School for Girls already take up the footway for periods of time.

The Safety Audit concludes that a number of access options have been explored in the design process but the chosen solution with a new access from Chislehurst Road and the Bickley Road access used for exit purposes only are found to have the least environmental impact, are most technically sound, allow for traffic to be shared across both roads and is the preferred option from a highway engineering and safety perspective given the nearby junctions.

A fundamental issue would be whether parents go onto the site to pick up /drop off pupils. This could depend on a number of factors, such as parent's routing. There are still questions around if there is enough waiting space for the number of vehicles forecast and whether the length of time drivers take to go through and exit the site deter them from going in.

The existing and proposed pedestrian facilities on Chislehurst Road are contrary to standards as they are not of sufficient width to accommodate the anticipated increase in footfall. This combined with increases in traffic volumes could lead to increased road safety concerns as pupils attempt to cross the road. The Stage 1 Road Safety Audit therefore raises a range of serious

highway safety concerns in relation to the schools proposed access arrangement and the sub-standard pedestrian facilities have been provided. The items raised in the Stage 1 Road Safety Audit have not been appropriately addressed in the application or its revisions and therefore raise significant pedestrian and road safety concerns.

No assessment of associated pedestrian/cycle routes has been provided or how these additional trips will be accommodated on local footways.

There could be “School Keep Clear” markings provided but yellow lines have limited effect around schools unless a traffic warden is continually present.

In respect of the proposed pedestrian access on Bickley Road this is likely to generate a significant increase in footfall on a London Distributor Road. Therefore crossing Bickley Road in the vicinity of the school is a serious concern and a dedicated pedestrian route to minimise conflict and provide access to public transport connections is required. It is proposed that a puffin crossing is to be installed however, such a provision needs to be designed, safety audited and secured through a s106 legal agreement. Limited details have been provided at this stage and it is not clear whether this could be satisfactorily achieved given the proximity of the nearby traffic light controlled junction.

Officers have suggested that an alternative scheme(s) for access should be explored in detail to see what the impacts would be on providing the access and egress to the site from Bickley Road. The supporting information indicates that this option has been discounted due to a number of factors including the existing wall and gates, potential problems relocating the bus stop on Bickley Road, and impact on trees and the playing fields. However, the existing brick wall and access gates are not either statutory or locally listed and although of some merit, their retention is not currently controlled. The other matters raised may not be fatal to any such proposal. Since this option for access has not been explored thoroughly (no detailed plans or studies showing its impact have been submitted for consideration), it cannot be discounted, and given the issues raised in the Safety Audit and elsewhere regarding the access arrangements proposed in the application, this is not considered acceptable, contrary to Policy T18. The impacts of the proposed access on vehicular and pedestrian safety are unacceptable.

- Traffic Generation

The submitted Transport Assessment (TA) has identified the proposed traffic levels which have been sourced from travel survey data of staff and pupil levels and modal splits at the nearby Girls School. The TA estimates that 235 additional trips in the AM peak hour and 40 in the PM peak hour will be likely when taking into account measures in the Travel Plan.

The TA states that whilst the junction modelling shows that 3 local junctions exceed their theoretical capacity in future year scenarios, the impact of the traffic during the development phase is minimal when compared to the base

traffic flows and is not considered to be severe in accordance with paragraph 32 of the NPPF.

With regard to impact once the school is open, an additional 152 rail trips, 218 bus trips are identified and there is capacity to accommodate these additional trips.

The data from the Girls School would include siblings sharing so the figures for car sharing may be on the high side for a one year intake.

The TA argues that this does not consider the effect of siblings sharing which would reduce the car trips by 5% and the effect of the School Travel plan which would reduce trips by 10%. However, this seems ambitious particularly given the modal split is taken from a school with a Travel Plan in place and where there would be siblings present.

The number of vehicular trips has been reduced using various assumptions – siblings, use of Travel Plan etc but the modal split would already have taken these into account.

There are therefore questions over the number of trips that the school will generate and whether the information provided is accurate. The potential for the Travel Plan to work has also been questioned, with a high likelihood that parents will drop off their children on the way to work.

- Capacity

The local highway network is operating at or close to capacity and the traffic generated from the proposed school will only add to the sometimes substantial delays on the network.

The 3 junctions at the corners of the site have been subject to modelling to demonstrate the effect of the additional school traffic. The surveys show that the junctions are working close to or over capacity at present.

The roundabout junction of Bickley Road and Chislehurst Road is overcapacity at present. There are substantial queues on Chislehurst Road in the AM peak. The computer model, ARCADY, is generally accepted as becoming unreliable once the junction goes over capacity and so it is unclear how much weight can be given to the results. There are other anomalies with the traffic flow diagrams shown in the TA. If the numbers input to the models are lower than those surveyed the results will underestimate the situation.

Given it is close to capacity, the highway network is obviously very sensitive to increases in traffic flows. As the junctions are likely to interact, together with the introduction of a signalised crossing on Bickley Road, there is a question whether the modelling will give a good indication of the existing and proposed situations. The additional school flows will only make the situation worse but, from the modelling presented in the TA, it is difficult to assess the level of the impact.

Consistent errors are present throughout the traffic flow figures which are used as the foundation for the junction capacity analysis. The traffic flow

figures do not combine the various traffic scenarios correctly which results in an underestimate of the impacts of the development, particularly on Bickley, Chislehurst and Widmore Road roundabout which is already operating in excess of its capacity. Therefore the junction capacity analysis based on these figures is not fit for purpose.

The significant variation of the results published in both versions of the TA and the sensitivity of the highway network, it is considered that the method of assessing junctions in isolation does not represent a sufficient nor credible analysis. As such, an alternative analysis model should be used to more accurately measure the impact of this development.

The surrounding highway network is already operating significantly in excess of capacity with significant amounts of queues and the introduction of such a large trip attracting land use will compromise the operation of the local road network. No mitigation to address this has been proposed. Given the existing stress on the junctions within the immediate vicinity of the site, the site is not suitable to accommodate the peak hour quantum of additional traffic associated with the proposed land use.

- Draft Travel Plan

A draft School Travel Plan has been submitted with the application. The plan aims to minimise the impacts of the school on the surrounding environment with regard to vehicle trips and congestion. The objectives include the increased use of public transport and walking by both pupils and staff. The report sets out to reduce car travel by 10%, a minimum 10% increase in pupils travelling by sustainable modes and a minimum 20% reduction in staff using single occupancy travel. It identifies walking, cycling and public transport initiatives and measures to reduce staff travelling by car. The report is based on the travel patterns at the girls school nearby and is initially set out for a 5 year period. The report is an ongoing strategy to encourage sustainable travel and will be regularly monitored with surveys every 6 weeks. The plan will be managed by the school with a travel plan co-ordinator appointed and a Steering group set up to include members of the community.

The submission of the Travel Plan is acceptable in principle and is also supported by TfL and the GLA and needs to accord with planning policies and Policy 6.11 of the London Plan. Although questions have been raised by local residents in regard to its implementation and practical benefits, it is a necessary requirement and the proposals are acceptable in principle. Its measures and implementation could be secured by a condition.

- Car Parking

A total of 69 car parking spaces are proposed on site across two car parking areas, one car park for 11 vehicles, including 5 disabled spaces, is to the north of the site by the proposed Sports Hall. The main car park is in the south west of the site with provision for 58 vehicles. There is also a drop off / pick up bay for 10 vehicles on the northern edge of the main car park. A turning area is provided at the end of the car park. Coaches will not enter the

site and it is suggested they will use the nearby bus stops. Although coaches can pick up and drop off passengers at bus stops they cannot wait there. There will also be capacity on-site for 50 cars queuing on the site access road. Links between the car park, school building and sports hall have also now been identified in the revised submission and show full accessibility on the site.

In addition and in accordance with London Plan requirements as requested by the GLA two electric vehicle charging points have been provided in the revised submission in accordance with policy 6.3 of the London Plan.

Parking stress surveys were carried out in roads within an approx. 400m walk distance of the site in May 2016. These were between 0700-1000 and 1430-1830 at 30 minute intervals. They showed that there were a large number of spaces available throughout the survey periods. However, a lot of the spaces are on roads such as Bickley Road and Chislehurst Road, the closest to the site accesses, where parking is likely to cause interference with traffic flows. The nearest roads such as Pines Road and Shawfield Park where parking could reasonably be accommodated are already heavily parked. The surveys submitted do not therefore accurately reflect the existing on-street parking situation and the issues that could be raised.

The TA advises that all vehicles can be accommodated on site and there is no need for parking on public highways, however, in practice it is considered that the proposed car parking provision and measures are unlikely to address the potential of parents preferences.

The assumption with the layout and access arrangements is that parents will drive into the site to drop off and pick up children. However, there are only 10 short term parking bays provided which is well below the estimate of 137 cars. There is space within the site on the access road for vehicles to queue but much of this is single track and so vehicles will be unable to overtake should a car in front be delayed for any reason. Although there is an estimate in the TA of how long it takes to drive through the site there is no assessment of how long it will take to exit onto Bickley Road. This is likely to be an issue given the high volumes of traffic on Bickley Road, particularly in the afternoon, when a large number of vehicles will be trying to leave the site at the same time.

This means that it is highly likely that parents will park and wait on the surrounding road network to avoid going through the site to avoid delays. The two nearest roads to the site, Chislehurst Road and Bickley Road, are likely to be the most attractive and parking here will interfere with the free flow of traffic. Chislehurst Road already has queuing from the mini roundabout going past the proposed access and this will only exacerbate the situation resulting in reduced road safety and exaggerating congestion along Chislehurst Road. Waiting restrictions are unlikely to deter such parking unless there is a Traffic Warden present which is unrealistic on a daily basis.

The site also is intended to be open and be operational after school opening hours and at the weekend for other community uses. The TA indicates that it is intended the activities could include sports, health/community groups and

educational related activities. The traffic would route as per the school, vehicles would enter via Chislehurst Road and exit onto Bickley Road. How car parking and use of the site and one-way system be sufficiently controlled outside of school hours is not clear, however it is advised that staff will always be present on site to address any matters. Parking on the site would accommodate 68 cars and for events where parking demand exceeds the normal provision, for example parents evenings, the two games courts can be utilised and accommodate up to 80 additional cars. This additional event parking provision has been included in the revised submission. This will require marshalling to ensure that level of parking can be achieved and it is outlined that these provisions will be available and the site appropriately managed. This has the potential to be addressed via a condition.

- Construction Traffic Management Plan

A draft Construction Management Plan (CMP) has been submitted to support the application which has been revised since original submission. The plan outlines the management practices to be implemented throughout the period of construction works. It identifies the order of works with the first works providing a new access from Chislehurst Road, hardstanding for car parking and access and the temporary mobile school classrooms. The construction vehicles are to access the site from Chislehurst Road with turning and delivery provided on site. The revised CMP includes 67 car parking spaces for construction workers to be provided on the northern side of the site using the Chislehurst Road access (the original scheme did not provide construction workers car parking). It identified that construction work is expected for a period of 18-24 months and indicative numbers for construction vehicles are provided. It is proposed to set up a Transport Steering group and a Transport Coordinator and the site will be controlled by a Banksman and Booking system for deliveries. Further details are to be discussed before works commence and include measures to minimise noise, vibration and dust from the site. It is expected the final CMP could be controlled through a condition.

The construction of the main school will take place while the first year intake (180 pupils) is on site in temporary accommodation. Although turning and parking areas are shown onsite there is no area identified for material storage.

The approach/egress from the site is restricted by a number of existing features including height restrictions to rail bridges which cross A222 Summer Hill and B264 Old Hill and the A222/B264 roundabout junction at Widmore Road where there is restricted access for vehicles heading north bound that need to turn right ("hairpin" bend that inhibits the turning circle of longer wheel base vehicles).

In order to allow large vehicles to use the Chislehurst Rd / Bickley Road roundabout, turning to/from Widmore Road and Chislehurst Road, the traffic islands at the roundabout would have to be removed. The timescale given for this was up to 18 months. The islands are used by pedestrians, including pupils from Buller's Wood School for Girls, to cross the roads and they also control the deflection of vehicles around the roundabout. Removal of the islands for that period of time would not be acceptable and would result in

highway safety concerns. An alternative would be to route large vehicles around Shawfield Park. This is likely to require waiting restrictions at the junction with Chislehurst Road. The CMP therefore provides an inadequate amount of detail and swept paths conclude that larger vehicles will not be able to manoeuvre onto Chislehurst Road. This could potentially prejudice the safety and operation of the surrounding highway network.

The CMP concludes that full details about the construction programme and vehicle routing will be discussed between Kier, TfL and LBB and could be secured by condition. However, there will be an impact during the construction period and a suitable construction route strategy has not been established which could suggest there is not a suitable route to accommodate construction vehicle access to the site. This therefore has not been resolved and remains a significant highway concern.

Options were looked at for a construction vehicle access from Bickley Road. However, these were discounted due to health and safety concerns due to the potential of conflict between the pupils and construction traffic, the works that would be needed to the internal road layout and the potential for disruption to the flow of traffic on Bickley Road. The existing access cannot be used as it is potentially unsuitable for heavy goods vehicles and the restricted width of the access, due to the wall and trees of 3.5m (although it is set out above that this wall and gates are not the subject of any statutory protection and on that basis their removal may be considered acceptable to secure other benefits).

- Public Transport

Buses: There are over 200 pupils estimated to come to the school by bus and there are two bus stops in proximity to the Bickley Road access. There are no bus stops on Chislehurst Road which forms the main entrance. However, there is currently no nearby crossing point and, given the level of traffic flow, some form of crossing would be needed to enable pupils to cross the road. A puffin crossing has been identified in the TA to allow pupils to cross Bickley Road this would require a contribution towards the cost of these works. For this to be taken forward it will need to be secured via a s106 legal agreement, to date no draft agreement has been submitted. Alternatives could include a traffic island or a zebra crossing however no assessment has been made of these alternatives in the submitted TA.

In addition, the bus stop (north bound) by the exit on Bickley Road will need to be moved 40 metres to the east to accommodate the crossing and provide suitable vision splays for the junction. TfL have agreed to this in principle, however limited details have been provided at this stage and it is expected that the applicant will pay for these works. No mechanism to secure this contribution has been submitted with the application. In addition, it is expected that the south bound bus stop will also need to be enhanced from a 2 bay bus shelter to a 3 bay shelter and TfL have stated that the applicant will need to fund this. No details or potential contribution have been provided.

TfL's response indicates that given the number of pupils, there will be constraints and potential overcrowding on the local bus services (routes 162

and 269). It is expected this will be accommodated but limited clarification on this is available at this stage and TfL have suggested that the applicants may need to contribute towards the enhancement of the bus service and that this needs to be secured in accordance with Policy 6.7 of the London Plan, again no details have been provided. Some pressure on these services could be relieved if the school start and finish times are staggered with the nearby Bullers Wood School for Girls. It is proposed that the Boys School would start at 07:45 and finish at 15:20; the Girls School would start at 08:25 and finish at 15:10. TfL have accepted these staggered times but there does not appear to be much of a difference between the times given the additional distance from the Girl's School to the bus stops on Bickley Road. No details of any mitigation, additional services or measures to meet the additional demand for bus travel has been provided.

Trains: There are 147 pupils estimated to use the train. The footway from Bickley station along Southborough Road towards Bickley Road is relatively narrow. In the morning peak pupils will be walking against the flow of commuters going towards the station and there is a likelihood that pupils will step into the road. The carriageway is also relatively narrow so there is likely to be a conflict with vehicles. The width of the footpaths and roads near the site therefore raises similar concerns to those already discussed in terms of pedestrian safety.

- Cycle Parking

Cycle parking is to be provided on site and a total provision of 36 cycle spaces including 18 Sheffield stands will be provided on the site. These are to be located in two areas, adjacent to the main entrance and to the south of the school building adjacent to the car park. This provision is based on surveys at Bullers Wood Girls School which showed no pupils and only 4% of staff currently cycle, which would generate a need for 7 cycle stands on the site. Highways are therefore satisfied with the level of provision being proposed, however the GLA and TfL required much higher standards in line with guidance in the London Plan. Therefore further spaces have now been provided for up to 120 spaces if more cycle parking facilities are required in the future. These additional spaces would be located to the south of the school building and are considered to address the London Plan requirements.

- Servicing

All servicing and deliveries to the site will take place from the proposed vehicular access on Chislehurst Road and leave via the same access. This includes refuse vehicles. A delivery area and bin store is to be provided adjacent to this access with a dedicated waiting and turning area. Swept paths have been provided for large vehicles and identify the acceptability for vehicles to turn on site and the provision of these facilities. However concerns have been raised over the practical use of this access/exit for service vehicles and how this will be managed. The limited ability to satisfactorily manage or control the use of this point of access for different purposes/users on a daily basis could be problematic and has not been fully addressed.

Use of this access for all servicing vehicles and the location of the bin store also raise issues in respect of increased noise and disturbance from this access and its use and the impact this will have on the amenities of nearby residential properties.

- Other transport considerations

In respect of the temporary accommodation, a prefabricated building will be placed on the southern car park for a year to accommodate the first year intake of 180 pupils and 10 FTE staff while the main school is built. It is now proposed that a 10 bay parent drop off and pick up is provided in addition to 9 spaces for school staff accessed from Bickley Road. This has been revised since submission which originally intended that the temporary accommodation would not be accessible from Bickley Road for parents cars. Nevertheless, the access from Bickley Road is only wide enough for one vehicle at a time and it is not clear how this will work or be managed during drop off and pick up periods.

Any highway works outside of the application site, to facilitate development on site, will be at the expense of the developer/applicant, in accordance with TfL or LB Bromley requirements. Contributions for these highway measures will be required and need to be included in a S106 Legal Agreement. Although there has been consideration by the Applicants of these matters and confirmation that contributions are likely to be forthcoming no head of terms or draft legal agreement has been submitted at the time of reporting to consider these matters further.

- Highways and Transport Conclusions

Given the importance of establishing new schools to meet identified need as clearly set out in government policy, the Local Planning Authority commissioned an independent highways consultant to review the key highways aspects of the application. The key findings of this report are as follows:

- The current proposals are considered potentially unsafe. It is recommended that further consideration is given to the pedestrian facilities with a view to providing a more conventional arrangement which would allow pedestrians exiting the school to dissipate rather than funnelling them to a single point.
- There is therefore currently insufficient information to determine if the drop off and pick up facility will operate effectively and safely.
- It is recommended that the impact of the development is tested using specific two-way trip attraction figures set out in the report rather than those used by the applicant.
- The 7% increase identified in the applicant's TA impact assessment does not prove that the impact will not be severe.
- Other concerns about the methodology for junction modelling used in the applicant's submission are raised

- Mitigation measures should be explored to determine if the impact at the nearby junctions can be brought back closer to the 'without development' scenario thereby ensuring that the impact will not be severe.
- Details of the proposed temporary islands should be provided to give officers comfort that the proposed arrangements are achievable. However, it is recognised that the delivery of CMP would normally be agreed through planning condition and its delivery is unlikely to frustrate the development.
- It is concluded that the applicant has not demonstrated that the residual cumulative impact of the development will fall short of severe in the context of paragraph 32 of the NPPF. As such, further information should be requested from the applicant or the application should be refused.

Any further comments from the applicant further to this report will be reported verbally.

Due to the level of highway and pedestrian safety concerns raised in the above section, the application is considered unacceptable in this regard due to the potential detrimental effect on road safety and free flow of traffic, being contrary to Policy T18 of the UDP 2006. The proposals will prejudice the operation and safety of the surrounding highway network which is contrary to Paragraph 32 of the NPPF (2012).

Design, Layout and Scale

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, 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.

Consistent with this, Policy BE1 of the UDP requires new developments to complement the scale, form, layout and materials of adjacent buildings and areas. Development should not detract from the existing street scene and the space about buildings should provide opportunities to create attractive settings.

The design, site layout and the configuration of the proposed building have been submitted in detail. The proposal includes a combined school and sports hall building, which results in a compact form of development on the site largely on the site of the existing tennis courts. It is proposed to position the school building fairly centrally within the site and this siting allows for most of the existing trees to be retained which also act as a landscaping screen to the main buildings. Two sycamore trees will be lost to enable this proposed siting, which enables the building to be constructed on the most developed part of the existing site, thereby resulting as far as possible, in a reduced impact on the open nature and character of the site.

The form and massing of the proposed building on the site would largely utilise and fit within the topography of the site and the stepped form of the building would appear to be a sensible solution to the changes in ground levels, whilst providing the level of accommodation required. The proposed siting is, nevertheless, in close proximity to existing residential properties (35m) and this does raise concerns in respect of the impact on existing residential amenities and the impact on the street scene. The proposed sports hall will be approximately 10 metres in height and the main school building will have a total height of 12.5m. It is submitted that the proposed building would be largely screened by the existing mature trees of up to 30m in height; however, this in itself will not fully address the visual impact nor the resulting impact on residential amenities.

Notwithstanding the above paragraph, there is limited scope to site the building further away from the boundary, due to the siting of mature and prominent trees on site, including an ancient Yew tree, which have informed the design process and siting of the proposed building. The adjacent/retained trees will also provide a significant level of screening to all boundaries. The applicant has submitted street scene sections and CGI images that show the limited visual impact of the building from outside the site, resulting from the level of existing tree screening and siting of the proposed building. However, an appropriate balance needs to be made between the need to present an appropriate building frontage to Chislehurst Road and Bickley Road, whilst respecting the existing character of these roads and neighbouring residential properties.

Concerns raised that the principle entrance to the school building and site is sited on Chislehurst Road and that this may not be appropriate for a residential road with a residential character, albeit a busy road. Suggestions were made that the principle entrance should be from Bickley Road instead. However the applicants discounted this opinion for a number of reasons set out in the Highways section above.

Significant concerns have been raised by residents over the siting of a large school building close to residential properties. This is compounded by the siting of the vehicular access to the school adjacent to the main building. This matter requires careful consideration in the overall balance of planning considerations.

The design and proposed external facing materials for the new school building are of an acceptable quality. The building will have a modern appearance that reflects its environment and is appropriate for its proposed use. Concerns have been expressed about the exterior cladding shown on the plans and whether it would be the most suitable material for this site. It was suggested that timber elevational treatment to blend the building into the green character of the immediate locality would be the most appropriate solution. However, the applicant has identified that timber would not provide the required 40 year lifespan and coloured cladding, broken up by glazing, alternative cladding and a grey brick to the lower elevation is proposed. The choice of colours proposed will soften the impact of the building on the open nature and character of the site and help blend the building into the site. On balance the appearance of the building would be acceptable.

From a planning (as opposed to technical highways) perspective, the additional access onto Chislehurst Road raises significant concerns regarding the amenity and landscape impacts of an additional access point. There will be an impact on the protected trees and root protection zones and any further loss of trees on the site would not be encouraged. The increased pressure on retained trees also increases with the proposed hardsurfacing on the site.

Visually, the proposed works to the Chislehurst Road frontage are likely to significantly change the character of this part of the site and the street scene. The character of this street will also alter significantly around the entrance to the site with a considerable increase in activity and vehicle and pedestrian movement. This is in addition to the existing use of this route by pupils travelling to the existing Bullers Wood Girls School. The consultation responses from neighbouring residential properties would raise significant additional concerns regarding safety and the impact on residential amenities and at this stage concern would continue to be raised with the proposed approach to the Chislehurst Road frontage.

The impact of the development to Bickley Road and Pines Road will be acceptable in visual amenity terms.

It is proposed to reinstate an existing roadway within the site that will require resurfacing to be brought up to standard. This loops through the trees on the north western corner of the site and addresses the impact on the trees in close proximity and their root systems. These aspects do increase the level of built development on site, which has been the intention to minimise as far as possible in terms of the built form. The plans submitted also result in an overly complicated layout that appears to be designed in part around reinstating this access road which results in limited benefits and is at odds with the need to minimise development.

Accessibility was raised as an issue by the GLA in the Stage 1 referral – additional details provided that satisfy these concerns and provide a level and safe means of access between different aspects of the site and buildings.

In conclusion, the design, scale and layout of the buildings is considered on balance to be acceptable, however there are concerns around the treatment

of the Chislehurst Road frontage and this raises a question of whether overall the proposal can be considered to comply with Policy BE1 of the UDP.

Residential Amenity

In determining any application, a key consideration would be the impact of the development on the amenities of neighbouring properties. Policy BE1 of the UDP requires development proposals to safeguard the residential amenities of the area by ensuring that the current living conditions of occupiers of neighbouring buildings are not harmed through noise and disturbance or by inadequate daylight, sunlight, privacy or overshadowing.

There is the potential for the proposal to result in harm to residential amenities as a result of the siting of the building, intensification of the use of the site, location of the new vehicular access point, car parking area and access road and the use of any additional sports pitches/outdoor facilities. Concern is raised specifically in relation to the siting of the school building in close proximity to the boundary at Chislehurst Road and the new vehicular access from Chislehurst Road.

The proposal to set the building behind existing tree screening will provide some mitigation to the development impact. Further, the new vehicular access to the site has been positioned/sited to allow a view through the site and of the games area rather than the proposed school building. Again, this will assist in minimising the visual impact to some extent. On balance the impact of the built development on residential amenities is considered acceptable.

Use of the Chislehurst Road access for all servicing vehicles and the location of the bin store in this area also raises issues in respect of increased noise and disturbance in this location, and the impact this will have on the amenities of nearby residential properties. Whilst there are concerns about the access from a technical highway viewpoint, on balance the impact of the new access on Chislehurst Road on residential amenities would not be so severe as to warrant a refusal, in particular as this would be primarily an access as opposed to an exit (deliveries would exit here but this would not result in substantial traffic movements), so this limits any waiting traffic that you would find when exiting a site.

The proposed activities associated with all elements of the proposal could also give rise to a degree of noise and disturbance to local residents, in particular any out of school hours uses. However, the benefits of the wider use of the facility and the vegetation screen around most of the site along with the distance of the facilities to be used means that it is considered that the proposed Community Use Agreements, along with appropriate conditions restricting hours of operation and lighting etc, are considered an acceptable way of mitigating any impact on neighbouring properties in terms of potential activities, noise and disturbance and on balance this impact may be considered acceptable.

Overall, whilst the proposal will clearly alter the residential environment, there is not considered to be any substantial harm identified that would conflict with development plan policies and warrant refusal of the application in this regard.

Trees and Landscaping

Policy NE7 requires proposals for new development to take particular account of existing trees and landscape features on the site and adjoining land and Policy BE1 requires proposals to respect existing landscape features.

The site is covered by a Tree Preservation Order and all the trees are protected. The site still shows signs of its past use, mainly by the trees present as the size and species show that they were landscape features of the manor house which used to be located on the site. This includes an avenue of old pollarded Lime trees and established tree groups. There are a total of 90 individual trees, 16 groups and 1 woodland. This includes an ancient Yew tree to the south of the site which is a significant constraint to development.

An Arboricultural Report and Arboricultural Impact Assessment have been submitted in support of the application and undertaken in accordance with BS 5837:2012. 15 trees have been categorised as 'A' grade trees of high quality and value, 54 trees, 8 groups and 1 woodland have been categorised as 'B' grade of moderate quality and value and 21 trees and 8 groups have been categorised as 'C' grade trees of low quality and value.

It is proposed to remove 5 'B' grade trees, a section of 1 'B' grade group, a section of 1 'B' grade woodland, 5 'C' grade trees and 1 'C' grade group to facilitate development and the impact to amenity should be minimal. Root protection zones (RPZ) have been identified and a preliminary tree protection plan has been produced. Any works within a RPZ which includes the existing access road and new footpaths would be conducted using a minimal dig methodology and use cellular webbing.

The design and layout of the proposal has given consideration to the impact of the development on the protected trees with most being retained and protected. The proposed school block is sited on the current tennis courts and therefore results in a minimal loss of trees on the site. The information provided as part of the Arboricultural Report has addressed the tree constraints and indicates the possibility of development with the retention of important trees. The tree works proposed are well justified and are proposed on the basis of good arboricultural management. The significant trees worthy of retention are incorporated into the scheme without any detrimental impact. The loss of trees on the site and the proposed works are therefore acceptable and in accordance with planning policies and recognized arboricultural practice.

All outstanding matters and a full and detailed landscaping scheme could therefore be required by conditions to include proposed areas of hard surfaces and soft landscaping, a final Tree Protection Plan and Arboricultural Method Statement in order to protect and retain the trees on site and details of

protective fencing during the course of building work.

Temporary Accommodation and Phasing

Due to the timescales involved in this proposal there is a need to provide temporary accommodation on site in the form of a two storey mobile classroom structure, with associated, access, drop-off area, car parking and outside play space. Details of this provision and siting are included within the submission. There is a requirement to open the school in September 2017 due to the intake this year and therefore a temporary building would be required for a period of 1 year which would be sited close to the Bickley Road boundary to accommodate up to 180 pupils. The temporary building is to be sited on the site of the main school car park and fencing off from the rest of the site during construction. It was originally submitted that parents would not be able to access the site for this first year which was not an appropriate solution. Access arrangements from Bickley Road and a drop-off area have now been provided for the temporary facilities.

The siting of the temporary facilities are well screened from the road and will utilise the existing vehicular access into and out of the site. Being of a temporary nature there is no objection to this aspect of the proposal for the first year during construction.

Continued use of the sports facilities on site by the Girls School has been outlined to maintain appropriate provision of sports and playing pitch facilities throughout the construction stages and on an on-going basis.

It is also noted that the replacement on-site ATC base/facilities have been identified in the submission. With facilities temporary provided off-site during the construction phase with access to meeting space to be provided within the main school building once completed.

It is noted that the original schedule included a start date for construction of January 2017 and the main school building to be ready for occupation by September 2018.

Planning Contributions

Policy IMP1 (Planning Obligations) and the Council's Planning Obligations SPD states that the Council will, where appropriate, enter into legal agreements with developers, and seek the attainment of planning obligations in accordance with Government Guidance. A Section 106 (S106) Legal Agreement or Unilateral Undertaking is required. The draft Heads of Term would need to be agreed in principle and would need to include:

- Potential Carbon offsetting contribution
- Contribution towards cost of repositioning north bound bus stop and extending the size of the south bound bus shelter on Bickley Road
- Potential contribution towards mitigation of capacity issues on the local bus network

- Highway puffin crossing works/contribution or similar
- Other highway works as may be required
- Travel Plan
- Reimbursement of the Councils legal costs.

At the time of reporting no heads of terms or draft agreement has been received.

Other Technical issues

- Ecology and Protected Species (Bats)

The planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes; minimising impacts on biodiversity and providing net gains in biodiversity where possible. The NPPF addresses ecology in paragraph 109 which states, the planning system should aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitments, which include establishing ecological networks that are more resilient to current and future pressures. Paragraph 118 of the NPPF also states that opportunities to incorporate biodiversity in and around developments should be encouraged. UDP Policies NE2, NE3 and NE5 seek to protect wildlife features and protected species requiring development proposals to incorporate appropriate mitigation where damage may occur.

The site has the potential to support wildlife habitats and protected species. A Preliminary Ecological Appraisal and Bat Report have been submitted in support of the application to determine the ecological value of the site, its habitats and if there are any protected species on the site. The pavilion building and ten onsite trees have potential to support roosting bats. Small areas of vegetation suitable for reptiles will be removed to facilitate development. The ecological appraisal concluded that a bat survey was required.

The Bat Report observed no bats emerging from the potential bat roosting features and it is unlikely that bats are roosting within the pavilion. Bats are using the site and to ensure the grounds remain suitable for bat foraging and roosting, external lighting shall be minimised wherever possible, especially in the vicinity of boundary vegetation and trees that support features suitable for roosting bats. Further tree surveys will be required if illumination of any trees and used to inform mitigation and licensing requirements. Enhancement measures should include bat boxes affixed to boundary trees in dark areas. Further tree surveys (if required) and bat mitigation measures could be controlled through conditions.

Other site enhancement measures include the establishment of a new hedgerow section on the northern boundary, establishment of rough grass margins and the inclusion of nest bricks within the new building for house sparrow and starling. Other precautionary measures are advised during

construction stages and these could all be controlled through suitably worded conditions. The development would therefore be in accordance with the above policies.

- External Lighting

An External Lighting Report was submitted with the application and details the external lighting provision proposed to illuminate the school site, which includes pedestrian walkways, roadways and car parks. Details of the type of lighting and its location on site are submitted. Roads will be illuminated by LED bollard lighting which limits overspill, car parks with 3m LED column lights and pedestrian pathways by bulkhead lights or low level bollard lighting. These will all be controlled via a photo cell to turn the lights on at dusk and turn them off at dawn, all lighting will be turned off at 22.00 until 07.00. The lighting scheme will use warm white LED lighting which shall be directed to ground and light spill minimised. This scheme addresses the use of the site by bats and minimises light pollution to other parts of the site and the wider area addressing the requirements of para. 125 of the NPPF.

- Air Quality

An Air Quality Assessment has been submitted in support of the application. The site is situated outside an Air Quality Management Area (AQMA). The Air Quality Assessment is to determine the impact of emissions from road traffic on sensitive receptors. Additional car journeys generated by the development have been considered and will not have a significant impact on local pollutant concentrations. The assessment is in relation to the exposure of occupants of the new development rather than the impact of development.

Predicted concentrations have been compared with air quality objectives and indicate the annual mean NO₂ concentrations are below the objective in the worst case scenario. Concentrations of PM₁₀ are predicted to be within the annual mean objective in 2019. It also identified a need to extend the distance between the school buildings and outdoor play areas with the A222 road source to reduce exposure of children and school users to elevated pollutant levels. Additional information submitted includes the addition of an air quality monitor on the northern boundary before and during construction to log data electronically and allow this information to be monitored.

The development therefore meets the London Plan requirements that new developments are air neutral and air quality impact in the local area as a result of this development is not expected to be significant. Conditions have been recommended to ensure and address any matters which could subsequently affect air quality and which could be attached to any approval.

- Acoustic Assessment

A noise impact assessment has been submitted which determines the appropriate levels of background noise and the noise associated with various aspects of the proposed use in accordance with policy 7.15 of the London

Plan and the NPPF. The calculations identify that the internal noise levels for the school will be acceptable and due to the background noise levels there will be no requirement for enhanced acoustic glazing on the main school building, noise levels are expected to be limited to levels which are compliant to known standards when the proposed ventilation strategy of openable windows is implemented. The sports hall will have natural ventilation methods such as louvered openings and wind catchers and will require minimal attenuation. The noise levels will comply with relevant standards and the impact of noise from the car park and usage of the external areas is expected to be minor adverse in the short term, reducing to negligible in the long term. It is confirmed that all the potential noise issues could be controlled through appropriate conditions in accordance with Policy 7.15 of the London Plan.

The report does not, however, address noise from the school and site and its impact on local residents and their amenities which requires consideration in respect of the impact on local residents and their amenities to fully comply with the requirements of Policy 7.15 of the London Plan.

- Sustainability and Renewable Energy

The London Plan provides the policy framework in respect of sustainable construction and renewable energy, and in particular Chapter 5 of the London Plan (in particular policies 5.3 & 5.6) and the Supplementary Planning Guidance entitled Sustainable Design and Construction. In addition, Policy BE1(vi) of the UDP, regarding sustainable design, construction and renewable energy is also relevant.

The application is accompanied by an Energy Report, District Heating Strategy, Summertime Overheating Report and Ventilation Statement which identifies how the need for energy is to be minimised and controlled throughout the lifetime of the development, design principles and in accordance with the energy hierarchy, London Plan policies and the SPG. The development has been designed to use less energy; is to be supplied as efficiently as possible and should use renewable energy where feasible. The Energy Statement shows how the development will provide energy efficiency savings that exceed the requirements of the Building Regulations 2013 by 7% including calculations of both carbon dioxide emissions and energy (in kWh).

The Energy Statement has considered the options for renewable energy, low and zero carbon technologies and demonstrated the feasibility of installing Solar PV panels as the most appropriate renewable energy solutions. The proposed installation of PV panels provides further energy savings and are expected to reduce Co2 emissions by a total of 21%.

The GLA in their Stage 1 response requested further information and clarification to show how the development accords with Policy 5.9 "Overheating and Cooling", how ventilation is to be controlled and whether there are options to connect to a District Heating Network, a detailed roof layout for the proposed PV installation and the shortfall in carbon emissions to be met off-site. These details have now all been submitted. This additional

information and the energy strategy is broadly supported and in line with policy expectations and the requirements of the GLA.

The reduction in co2 emissions falls short of the required 35% required under Policy 5.2 of the London Plan therefore a carbon offsetting payment would be payable based on GLA rates. This could be dealt with through a s106 legal agreement. However, the applicant has stated that an additional off-setting payment will not be offered due to the school being Government funded and the need to use these funds for the required provision of the school. This position has not been considered further by the GLA. Nevertheless, this is a significant improvement on the original position which did not include the provision of PV panels and therefore only a 9% carbon saving. It is not considered that such a shortfall should be the subject of a reason for refusal although the proposal does not fully comply with the energy policies and requirements identified in the London Plan and SPG.

- Conservation Area

The site lies adjacent to Bickley Park Conservation Area. Therefore Policy BE13 of the UDP and para 129 of the NPPF are relevant to development adjacent to a conservation area. Consideration of whether the proposal preserves or enhances the character and appearance of the Conservation Area (a heritage asset) is required. In addition, the function of the proposed use and whether this impacts on the character of the Conservation Area needs to be assessed.

The Conservation Area boundary includes the front gardens of the houses on the eastern side of Pines Road but not the road itself. There is substantial screening along the eastern side of the site even in the winter and there is a significant separation between the proposed school building and the boundary of the Conservation Area. Given the separation and screening important views into and out of the Conservation Area would not be affected and not from any public vantage points. Some glimpses of the new building would be visible from some locations but given how limited these would be it is considered that no harm would be caused. The existing school playing fields will be retained as a substantial parcel of open land and the development would not appear overbearing or cramped and the character and appearance of the Conservation Area will be preserved. The function of the proposed use with no direct access from Pines Road which is already heavily parked during the day is unlikely to have a bearing on the character of the Conservation Area or cause any harm due to any increase in traffic that may result.

The proposal is therefore considered to preserve the character and appearance of the adjacent Conservation Area and accords with Policies BE13 of the UDP, 7.8 of the London Plan and para.129 of the NPPF.

- Archaeology

An Archaeological Desk-Based Assessment and Written Scheme of Investigation have been submitted in support of the application. The assessment did not identify any currently known archaeological remains,

although there is potential for buried archaeological remains to be present, particularly associated with the Widmore estate within the northern part of the site. It is recommended a geophysical survey should be undertaken as a first phase of a staged scheme of evaluation. The results can determine the best location for the proposed works and service trenches and if further works are appropriate. Several tree-lines and wooded areas have been identified within the boundaries of the proposed development area as qualifying as 'historically important' it is recommended that any changes to these assets be avoided or minimised.

The scheme of evaluation provides a programme and methodology for undertaking the works and the procedures for analysis and reporting. This evaluation would comprise fairly limited trenching on site to determine the presence or not of any quarries. Historic England (Archaeology) have recommended a two-stage condition in respect of further archaeological investigation and possible mitigation which would safeguard any potential archaeology and could be attached to any approval in line with NPPF guidance and Policies BE16 of the UDP and 7.8 of the London Plan.

- Flood Risk Assessment + Sustainable Urban Drainage System (SUDS)

The site is within Flood Zone 1 and at a low risk of flooding, however in view of the size of the site (over 1 ha) a Flood Risk Assessment was required. The proposed development results in no greater risk to surface water flooding. The proposed surface water drainage system includes infiltration drainage and onsite storage/attenuation in the car park. Surface water drainage rates will be retained at greenfield rates in line with guidance. The principle of the drainage strategy for the site is considered to fulfil SUDS requirements and is acceptable and in line with agreed standards. A condition to ensure full compliance with the drainage statement could be attached.

- Contaminated Land

A Phase 1 Desk Study and Preliminary Risk Assessment and Phase 2 Ground Investigation Report has accompanied the application which has identified hydrocarbon contaminants and a potential risk to human health. Further investigation and remediation measures are therefore required and it is likely that a suspended ground floor slab will be required. However, a condition could be attached to any planning permission securing a contaminated land assessment and an appropriate remediation strategy, which could address all these aspects appropriately in accordance with Policy ER7 of the UDP.

- Secured by Design

The proposal needs to incorporate Secured by Design principles (as required by Policy BE1 (vii)) and H7 (vii) to take account of crime prevention and community safety. Paragraphs 58 and 69 of the NPPF are relevant. Compliance with the guidance in Secured by Design and the adoption of these standards will help reduce the opportunity for crime, creating a safer, more secure and sustainable

environment. A condition securing measures to minimise the risk of crime could be attached to any planning permission.

- Environmental Impact Assessment

As the site has an area of over 1ha it was necessary to “screen” an application as to whether it requires to be accompanied by an Environmental Assessment under the Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2015. The screening process identified that an EIA was not required for the proposed school and a formal opinion was issued on 5th August 2016.

Conclusions

The educational need for a new secondary school is fully acknowledged, and in the assessment of this application regard has been had to paragraph 72 of the NPPF (March 2012) which requires Local Planning Authorities to “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.” The applicant did engage in pre-application discussions with the Council, and there has been regular dialogue throughout the application process in attempts to resolve the matters of concern with this application.

In assessing this application, careful consideration has been given the government’s planning and educational policy statement from 2011 in particular: *“A refusal of any application for a state-funded school, or the imposition of conditions, will have to be clearly justified by the local planning authority. Given the strong policy support for improving state education, the Secretary of State will be minded to consider such a refusal or imposition of conditions to be unreasonable conduct, unless it is supported by clear and cogent evidence.”*

This application proposes a substantial development for a new secondary school on land current designated as Urban Open Space in the UDP, contrary to UDP Policy G8 and London Plan Policy 7.18. However a clear educational need for a new school has been demonstrated and the principle of the development of the site for a school is supported by the allocation of the site for a new school in the Bromley Draft Local Plan, (albeit that this draft plan has limited weight in the decision making process).

New school development to meet identified need is strongly supported through current government policy. The choice of this site has been substantiated by the submission of a detailed and comprehensive site selection study. Despite the conflict with the current Urban Open Space Policy G8, on the basis of the clearly identified need and site selection process undertaken by both the applicant and as part of the Local Plan process, the principle of a new secondary school on this site is considered acceptable as the need for a school would justify the setting aside of Policy G8 given the

demonstrated and imminent requirement for school places in the Borough, provided that site specific planning requirements can be met.

The proposed temporary accommodation is considered acceptable as part of the wider proposal for a school at the site for the reasons set out in the report.

There remains an objection from Sport England relating to the loss of playing field space, however in the overall assessment of the application, this matter is not considered to be so serious as to warrant refusal when considering the overall benefits of the new school as set out in the report. If permission was granted the application would need to be referred to the Secretary of State on the basis of Sport England's formal objection.

With regard to highways matters, Paragraph 32 of the NPPF sets out that planning decisions should take into account: whether:

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- safe and suitable access to the site can be achieved for all people; and improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development.
- Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

The views of the Council's Highway Engineer are that the proposal will result in severe impacts on the highways network both in terms of capacity and flow, and also pedestrian safety, thus making the proposal contrary to Policy T18 of the UDP and paragraph 32 of the NPPF. Specifically the new access to Chislehurst Road raises particular concerns which are detailed in the highways section of this report.

There will be an impact on the amenities of nearby residents as a result of this proposal and specifically there will be a change in the character of Chislehurst Road in the proximity of the new access. Whilst it would be desirable for access to the site to avoid Chislehurst Road altogether, the impact on residential amenities of this proposal would not be such a significant concern as to outweigh the benefits of a new school in light of the clear government policies on this matter.

The overall design, scale and layout of the development is considered to be acceptable and in accordance with policies. Whilst there are some concerns about the impact of the development given its proximity to some residential properties, these are not so severe as to warrant refusal and taking into account the benefits of the scheme this matter is considered acceptable.

Whilst the proposed development is, on balance considered to be acceptable in terms of all of the matters set out in the body of the report and related policies, unfortunately despite attempts to persuade the applicant to address these matters further, there remain a number of serious concerns about this

specific proposal in relation to vehicular and pedestrian safety and the impact on the highway network.

Given the strength of government policy supporting new school applications an independent consultant was engaged by the Local Planning Authority to provide a report to assess the highways aspects of the development. This report concludes that the applicant has not demonstrated that the residual cumulative impact of the development will fall short of severe in the context of paragraph 32 of the NPPF.

Careful consideration has been given to all the representations from the public and matters raised within these have been addressed in the considerations set out in this report.

Taking all of the planning considerations set out in this report into consideration, despite the clear need for new secondary school places, on balance the technical highways concerns raised are so severe that the proposal would not accord with development plan policy and it is recommended that on the basis of the application as submitted, permission be refused for these reasons.

The Mayor of London has stated that the application would not need to be referred back to him should it be refused, however it would need to be referred back if it was resolved that permission should be granted.

Background papers referred to during the production of this report include all correspondence on file ref: 02/01003/FULL1, 95/02264/FULMAJ 16/03315/FULL1 and 16/03145/OUT excluding exempt information.

RECOMMENDATION: PERMISSION BE REFUSED

Reasons for Refusal:

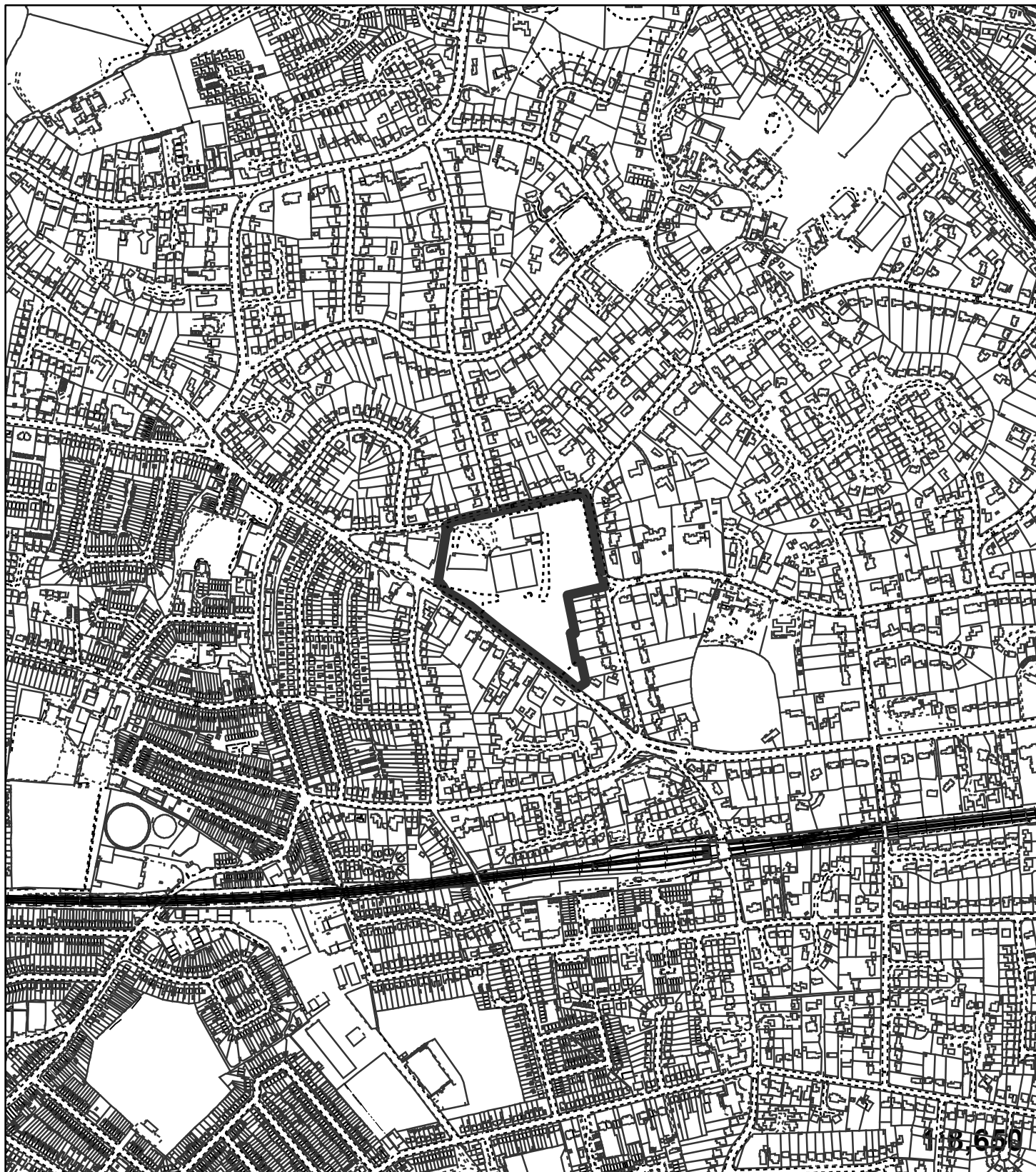
- 1. The potential traffic generation and capacity of the existing highway network along with the proposed access arrangements raise both road and pedestrian safety concerns that have not been fully addressed in the proposal and are likely to cause serve cumulative impacts contrary to Policy T18 of the Unitary Development Plan 2006 and paragraph 32 of the National Planning Policy Framework 2012.**

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Application:16/03315/FULL1

Address: St Hughes Playing Fields Bickley Road Bickley Bromley

Proposal: Proposed erection of a 6FE Secondary Boys School comprising a part 2 storey, part 3 storey school building of 8,443m² including a sports hall (also for wider community use) together with hard and soft landscaping, creation of a new vehicular access on Chislehurst Road, 68



"This plan is provided to identify the location of the site and should not be used to identify the extent of the application site"

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Application No : 16/04712/FULL1

Ward:
Bromley Town

Address : The Ravensbourne School Hayes Lane
Hayes Bromley BR2 9EH

OS Grid Ref: E: 540682 N: 168046

Applicant : Eden Park High School

Objections : YES

Description of Development:

Temporary siting of a two-storey structure for educational use (Class D1) for two academic years (until 31 July 2019) and associated external works including access ramp and stairs.

Key designations

Biggin Hill Safeguarding Area
London City Airport Safeguarding
Open Space Deficiency
Smoke Control SCA 51
Urban Open Space

Proposal

Planning permission is sought for the temporary siting of a two-storey structure for educational use (Class D1) for 2 academic years (until 31 July 2019) and associated external works including access ramp and stairs.

The proposed temporary building is proposed to provide accommodation for Eden Park High School (formerly known as The Beckenham Academy), a planned 8 form entry Secondary School proposed in the Beckenham/Eden Park area.

The proposed development would provide accommodation for up to 6 forms of entry for two academic years, after which it is anticipated that the school would be relocated to its permanent home. The school would have an intake of 180 pupils in the first academic year (2017-18) and take a further 180 in the second (2018-19) meaning that 360 additional pupils would be accommodated on the Ravensbourne School site by the 2018-19 academic year. The proposed temporary school would utilise existing facilities at the Ravensbourne School site. The proposed school would operate an extended school day from 08:20 to 17:30 which varies from that in operation at the Ravensbourne School.

The proposed development comprises a two storey temporary building, which will accommodate 6 classrooms per floor accessed via a central corridor, together with toilet facilities. A generator is proposed alongside the north-eastern side of the building, within a timber enclosure. The building is proposed to be located to the north-west of the existing MUGA, on land currently used as playing fields. The

building occupies an elevated position in relation to the adjacent playground, and works are proposed to provide improved access in the form of new steps and a ramp.

The application proposes to utilise part of the Ravensbourne School's playground to provide a dedicated off-street drop off/collection arrangement for parents to drop off and collect pupils via private car.

The applicant has submitted the following reports and technical documents in support of the application:

- Planning Statement (JLL, October 2016)
- Transport Statement (Robert West, October 2016 - updated to include all base line transport conditions, the proposed drop-off and collection arrangements and the predicted travel behaviour and demand submitted during the determination of the previous application)
- Mechanical and Electrical Scheme Proposal and Energy and Sustainability Strategy (Pinnacle ESP, December 2016)
- Desk Study (Momentum, December 2016)
- Design and Access Statement (Innes Associates, December 2015)
- Acoustic Feasibility Report (Cole Jarman, April 2016)

Members may recall that a duplicate application (ref 15/05521) of this current scheme was previously reported to Plan Sub-Committee No. 3 at the meeting held on 28th July 2016. The application was deferred without prejudice for the following:

- To await outcome of the application for a permanent site, and
- To seek further information in respect of the demand for pupil places in the local area

Subsequently, the applicant has exercised their right of appeal against the Council's non-determination of the application.

At Plans Sub Committee No3 on November 17th 2016 Members resolved not to contest the appeal. At the time of writing the report, a decision is awaited from the Planning Inspectorate.

In the Planning Statement that accompanies this application, the applicant advises that the position has changed in assessing the current application due to the submission of a planning application for a permanent school for Eden Park High School on the South Suburban Co-Op Sports Ground site in Balmoral Avenue.

Members should note that a report relating to the permanent school appears elsewhere on this agenda for consideration.

Location

The application site is located on the western side of Hayes Lane, Hayes, and comprises a Grade II Listed school which originally opened in 1911. The

immediate surrounding area is mainly residential in character. The school site is designated as Urban Open Space (UOS).

Consultations

Comments from Local Residents

Nearby owners/occupiers were notified of the application by letter, a site notice was displayed and an advertisement published in the local press. Comments received can be summarised as follows:

Objections

- Unclear why it is necessary to build in urban open space and there are no overriding arguments to overcome policy
- School will serve pupils from Beckenham and Croydon with no benefit to local community
- Would be better to locate school to new permanent site
- Impact on community in terms of traffic, littering, and nuisance
- Disruption from building works (Cromwell Close should not be used for access) and further detail required on proposed arrangements
- Impact on existing school facilities - teaching staff will work on both schools which potentially reduces time and effort spent on existing pupils
- Concern that development will not be temporary
- Loss of the cricket square is regrettable
- Bromley residents should not have their Urban Open Space impacted upon when the benefit will be for another Borough
- No point providing temporary accommodation if there is no permanent site yet
- Application should make more convincing case that there are overriding community benefits
- No compelling reason why new school will be chosen by Bromley residents and is likely to be populated by Croydon and Lewisham borough pupils which invalidates any reason for building on Urban Open Space
- Concerning that no specified location for the Elmers End coaches to pick up/drop off
- School car park already overcrowded
- Vincent Close already heavily congested and should not be used for proposed coach drop off and turning
- Recent incident of conflict between a resident driver and a delivery lorry in Cromwell Close raises safety concerns for the public and the school as this could have led to a serious incident

Support comments

- Significant need for school places and support new permanent and temporary school

Comments from Consultees

Historic England (historic buildings) (summary)

Advised that it was not necessary for the application to be referred to them for comment.

Sport England (summary)

Raised no objection to the application, subject to the imposition of two conditions, to require the submission and approval of a scheme to ensure the continuity of the existing sports use of the playing fields, and to require the removal of the temporary structure and the land reinstated to its former condition following the expiry of the planning permission.

Thames Water (summary)

Raised no objection with regard to sewerage and water infrastructure capacity.

Drainage

No comment.

Environmental Health

No objection subject to Informative to contact Control of Pollution Team

Highways

“The temporary accommodation the school will be 6FE rather than 8FE, and will not have any Sixth Form. Up to 360 pupil places will be provided during the second year by the time the School decants to its permanent site. 180 pupil places will be offered in the first year of establishment and a further 180 in the second.

It is proposed to provide accommodation for pupils of The Beckenham Academy within temporary buildings, to be located on the playing fields adjacent the existing MUGA.

It is proposed to provide on-site pick-up or drop-off facilities within the Ravensbourne School site. The School will only provide the facility for pupil drop-off and collection for the temporary pupil places proposed.

Existing Trip Generation

Mode shares from a student hands up survey, completed in March 2016, have been used to understand how pupils currently travel to and from Ravensbourne School. Table below shows mode share and calculated person trip generation for pupils at Ravensbourne School for both arrivals in the morning and departures in the afternoon.

Mode of Travel	Journey to School		Journey from School	
	Mode Share (%)	Trip Generation	Mode Share (%)	Trip Generation
<i>Car</i>	9.2%	121	7.1%	93
<i>Car Share</i>	4.5%	60	4.5%	59
<i>Park and Stride</i>	2.1%	28	1.5%	20
<i>DLR</i>	0.1%	1	0.1%	1
<i>Rail</i>	2.1%	28	2.2%	29
<i>Tram</i>	0.2%	2	0.2%	2
<i>Tube</i>	0.1%	1	0.1%	1
<i>Public Bus</i>	58.2%	767	60.0%	790
<i>School Bus</i>	0.2%	2	0.2%	2
<i>River</i>	0.0%	0	0.0%	0
<i>Cycle</i>	0.6%	7	0.6%	7
<i>Scooter</i>	0.0%	0	0.0%	0
<i>Walking</i>	22.9%	301	23.7%	313
Total	100%	1318	100%	1318

The above table demonstrates that pupils are using sustainable modes of travel for trips to and from school. Few car journeys are made and those that are made are split between car (as passenger, parking close to the School gate), car sharing (with friends) and car (as passenger, parking in the wider area and walking to the School gate).

It should be noted that there is variation between modes used to travel to School and those used to travel from School. More pupils are dropped at School by car in the mornings. This is reasonable on the basis that parents that have done this on the way to work would not necessarily be available to collect in the afternoon and other modes would be used to get home.

The survey also shows that 88 members of staff would generate a car trip and demand for parking at the school, and an additional 80 park in the wider area and walk to the School (i.e. Park and Stride). The level of parking that would be generated on-site appears to be consistent with that indicated by the school (approx. 100).

Given that not all staff members are full-time, that the school car park is not accessible between 08:10 - 14:50, and that only 88 parking spaces of 150 available are used, it is assumed that the level of park & stride recorded relates to inability to access the car park rather than it being as a result of capacity constraint.

Parking Beat Surveys

A street inventory and parking beat survey was undertaken at 15 minute intervals, within a 500m radius of the site and on a single neutral weekday (Wednesday 16th March 2016). The surveys were taken during School term in the morning peak period (07:30 - 09:45) and afternoon peak period (16:30 - 18:45).

It should be noted that the surveys were undertaken during times which coincide with the start and finish time of the temporary school i.e. 08:20 - 17:30 and as such

should provide an overview of parking conditions during the time in which pupils would arrive and depart.

There was found to be theoretical capacity to accommodate 229 parked cars in the study area (based on all unrestricted parking space, parking bays, permit holders, pay and display and shared use).

The results demonstrate that there is residual capacity for on-street parking in the study area surrounding the site. There is evidence of parking associated with Ravensbourne occurring in the study area with a gradual increase in parking demand in the morning period, yet there was found to be residual capacity for parking in all time intervals.

The parking occupancy data indicates that within the study area, Hayes Road and Hayes Lane had the highest level of demand, with a clear peak in demand during School pick-up, which was related to parking bays and unrestricted parking.

While Hayes Road had a high level of demand both in parking bays there was minimal fluctuation in demand which suggest this is associated with residential parking, and not School drop-off. It is expected that Hayes Lane is used. The results show there is no capacity available for additional parking in the morning and some capacity in the afternoon. On the basis of constraints in the morning and understanding that Hayes Lane is heavily trafficked, it would not be desirable for new demand to occur in this location and other locations were therefore investigated.

Cromwell Road and Sandford Road are locations where residual capacity for on-street parking exists. It is noted that these are also located within the CPZ and provide a mix of shared use bays, permit holder bays. Only shared use bays could be used by non-residents.

There is some capacity for additional parking in shared use bays on these streets. They are located to the north of Ravensbourne School where there is an opportunity to gain access to the site that will be used for the temporary accommodation for Beckenham Academy.

Proposed drop-off and collection

The parking beat data has identified that whilst residual capacity to accommodate parking demand exists in the wider area surrounding the school, Hayes Lane would be sensitive to any additional demand.

To wholly mitigate the potential for any parking impact, the School proposes to manage parking demand from pupil drop-off and collection by providing an area on-site for this purpose.

This area of the site is currently used for outdoor play space and congregation. The use of the area for curriculum based activities does not occur until after 10:00 on any day, and all finish prior to the Ravensbourne's School day at 15:25. Due to the

temporary pupils extended school day, drop-off and collection demand will not conflict with any curriculum based activities.

Access to the proposed drop-off and collection area will be taken via the existing gated access from Hayes Lane at the western extents of the site. Vehicles will continue on the existing route through the staff car parking area to access the drop-off and collection location. Egress is proposed to occur via the existing gated exit point onto Hayes Lane from the centre of the site.

The provision of separate access / egress is proposed to both maximise the capacity for vehicles within the site, and minimise disruption to Hayes Lane.

The access gate is currently used by staff for access to dedicated car parking towards the north of the site, and is locked at 08:10 as staff are expected to be on-site for 08:00 in the morning. It is recognised this will change as a result of the proposal, and the gate will remain open to allow access for pupil drop-off associated with the temporary pupil places.

Existing Ravensbourne School staff members are required to be on-site prior to 08:00, and will therefore not place significant conflicting demand on the access or internal route to the drop-off at the same time as parents of temporary pupils. The School do receive visitors who also arrive via the proposed egress. It is understood that visitors do not arrive on site until after 09:00 in the morning, and therefore do not occur at the same time as the proposed drop-off.

As staff will have left the site by 17:00, further parking on-site outside of collection area will be available should it be required in the afternoon. The site as a whole has provision for 150 vehicles in marked bays.

During the morning drop-off the area is not proposed to be used as a formal parking area. It will operate as a drop-off point only which will be managed to facilitate the circulation of vehicles to minimise dwell time.

The School will deploy trained staff to act on the marshals. The Marshalls primary role will be to ensure the safe and effective movement of vehicles and pedestrians. It is initially proposed that five Marshalls will be deployed at various points within the site to ensure that parents know where they should go, although it is anticipated this could be reduce in the future once new parents become acquainted to the site / operation.

A Marshall will be deployed at the site access and will be responsible for ensuring vehicles entering the site are authorised to do so. In order to regulate entries of vehicles onto the site and ensure they are restricted to parents / pupils of Beckenham Academy.

Drop-off movements will happen on the eastern side of the play area to allow pupils to depart and head east towards the temporary classroom location. This will remove any requirement for pupils to cross the path of vehicles.

In year 1, the School is expected to generate demand for drop-off from 26 vehicles in the morning and 21 vehicles in the afternoon. In year 2 this would increase to 52 in the morning and 44 in the afternoon.

Despite the lower public transport accessibility level and the non-distance based criteria for the non-selective Schools, the mode share statistics are comparable.

Parking behaviour

It is anticipated that not all parking impact will occur at any one time and that the way in which vehicles arrive and depart vary across the morning and afternoon period.

In the morning, the operation of the proposed drop-off will limit the amount of dwell time that vehicles can experience and are not expected to be stationary for greater than 10-20 seconds. As such, vehicles will not be on site for greater than a 2-3 minute period of time and will be spread over the 30 minute period prior to the start of classes.

The variance in the afternoon is due to increased dwell time as parking space requirements for pick-up can be much longer than for drop-off as waiting is unavoidable prior to pupils being released from class. Parents typically park for 15 - 30 minutes. This has influenced the projected arrival and departure profile, and calculation of cumulative parking demand.

Conclusion

Based on the assessment of comparable sites the temporary School is expected to generate demand for up to 26 vehicles in the morning and 22 vehicles in the afternoon peak period during Year 1 and up to 52 in the morning and 44 in the afternoon peak period in Year 2.

During the morning the dwell time of vehicles is expected to be much lower (10-20 seconds) compared to the afternoon (15-30 minutes). This is predominantly due to parents having to wait prior to pupils being released from class.

The anticipated demand for parking and the average dwell time the maximum demand for parking during the morning is expected to be 15 vehicles and during the afternoon is expected to be 42 vehicles. This demand for parking can be accommodated within the 55 marked parking spaces located within the internal access route and drop-off area. Therefore the impact of demand for travel by vehicle associated with pupil drop-off and collection can be dealt with through use of off-street parking within the site of Ravensbourne School.

If minded to approve please include the following:

H03 (Car Parking)

H22 (Cycle)

H29 (Construction Management Plan)

H30 (Travel Plan)

Nonstandard condition- off street facility for drop-off and pickup should be provided within the school five Marshals must be deployed at various points within the site to ensure that parents know where they should go. This may be reduced after six months to four marshals, once new parents become acquainted to the site / operation.”

Planning Considerations

The proposal falls to be considered primarily with regard to the following policies.

Relevant UDP policies include:

- T1 Transport Demand
- T2 Assessment of Transport Effects
- T3 Parking
- T6 Pedestrians
- T7 Cyclists
- T9 and T10 Public Transport
- T15 Traffic Management
- T18 Road Safety
- C1 Community Facilities
- C7 Educational and Pre-School Facilities
- BE1 Design of New Development
- BE8 Statutory Listed Buildings
- G8 Urban Open Space
- L6 Playing Fields

The following Supplementary Planning Documents (SPD) produced by the Council are relevant:

SPG1 Good Design Principles

The final consultation for the Preferred Submission draft Local Plan was completed on December 31st 2016. It is expected that the Examination in Public will commence in 2017. The weight attached to the draft policies increases as the Local Plan process advances. These documents are a material consideration (albeit it of limited weight at this stage). Policies relevant to this application include:

- 6.5 Education
- 6.6 Educational Facilities
- 7.1 Parking
- 7.2 Relieving Congestion
- 8.1 General Design of Development
- 8.20 Urban Open Space
- 8.23 Outdoor Sport, Recreation and Play
- 10.6 Noise Pollution
- 10.7 Air Quality
- 10.10 Sustainable Design and Construction
- 10.11 Carbon reduction, decentralise energy networks and renewable energy

Relevant London Plan Policies include:

Policy 1.1 Delivering the strategic vision and objectives for London
Policy 2.6 Outer London: vision and strategy
Policy 2.7 Outer London: economy
Policy 2.8 Outer London: transport
Policy 3.18 Education Facilities
Policy 3.19 Sports Facilities
Policy 5.1 Climate change mitigation
Policy 5.2 Minimising carbon dioxide emissions
Policy 5.3 Sustainable design and construction
Policy 5.7 Renewable energy
Policy 5.8 Innovative energy technologies
Policy 5.9 Overheating and cooling
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 7.2 An inclusive environment
Policy 7.4 Local character
Policy 7.5 Public realm
Policy 7.6 Architecture
Policy 7.14 Improving air quality
Policy 7.15 Reducing noise and enhancing soundscapes

The London Plan SPG's relevant to this application are:
Accessible London: Achieving an Inclusive Environment (2014)
Sustainable Design and Construction (2014)

National Planning Policy Framework 2012 (NPPF)

The NPPF contains a wide range of guidance relevant to the application specifically sections covering sustainable development, delivering a wide choice of quality homes, requiring good design, conserving and enhancing the natural environment, decision-taking and implementation. The NPPF makes it clear that weight should be given to emerging policies that are consistent with the NPPF.

Paragraph 7 states: 'There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

An economic role - contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure

A social role - supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations;

and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being

An environmental role - contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.'

Paragraph 14 makes it clear that at the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as the golden thread running through both plan-making and decision taking. In terms of decision taking it states that, 'where a development plan is absent, silent or relevant policies are out-of-date, permission should be granted unless any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted (specific policies in the NPPF cover issues such as land designated a Green Belt).

Paragraph 56 that 'Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.'

Paragraph 60 states that 'Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.'

Paragraph 61 states that 'Although, visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment. '

Paragraph 64 states that 'Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.'

Paragraph 65 states that 'Local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits).

Paragraph 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 choice in education'.

Paragraph 96 states that 'In determining planning applications, local planning authorities should expect new development to: 'take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.'

Planning History

There is extensive planning history at the site. The following recent applications are of relevance (a full list can be viewed on the planning application file):

15/02777/FULL1 - Single storey extension to the gym
Planning permission granted 18.8.15

15/02780/LBC - Single storey extension to the gym - Listed Building Consent
Listed Building Consent granted 18.8.15

15/01254/FULL1 - Single storey extension to the gym
Planning permission granted 21.5.15

15/01255/LBC - Single storey extension to the gym - Listed Building Consent
Listed Building Consent granted 21.5.15

13/01251/ELUD - Retention of 2 screens adjacent to hard surfaced sports pitch
Lawful development certificate granted 12.2.14

12/01840/FULL1 - First floor extension to sports hall (over existing changing rooms) to provide 2 classrooms
Planning permission granted 18.9.12

15/05521 - Temporary siting of a two-storey structure for educational use (Class D1) for 2 academic years (until 31 July 2019) and associated external works including access ramp and stairs.

Application deferred at Plans Sub Committee No. 3 on 28th July 2016. An appeal against non-determination of the application was submitted to the Planning Inspectorate. On Plans Sub Committee No. 3 on 17th November 2016, Members resolved not to contest the appeal and the Planning Inspectorate was advised accordingly. A decision is awaited at the time of writing this report.

Conclusions

The main issues for consideration in this case are as follows:

- The acceptability of the proposed development in principle including the impact on the Urban Open Space and the availability of sports pitches
- The impact of the development on local character
- The impact on the setting of the Grade II listed school buildings
- The impact on the amenities of neighbouring dwellings

- Traffic and parking issues
- Other technical matters

The acceptability of the proposed development in principle

There is significant need for new school places within the Borough and strong policy support for new education related development at a national, regional and local level. The government attaches great weight to ensuring that a sufficient choice of school places is available to meet demand and says that local planning authorities should give great weight to the need to create, expand or alter schools (Para.72, NPPF). The London Plan, at policy 3.18, is consistent with this stating that development proposals which address the current and projected shortage of secondary school places will be particularly encouraged. At a local level, UDP Policy C7 states that new or existing educational establishments or pre-school facilities will be permitted provided that they are located as to maximise access by means of transport other than the car. The site benefits from a PTAL rating of 3 (moderate) and is already occupied by a school site which is close to a number of public transport links including bus routes in Hayes Lane and Masons Hill.

The proposed development would provide temporary accommodation for a new secondary Free School pending the development of a permanent site. The permanent location is anticipated to be at Balmoral Avenue in Beckenham and is subject to a pending planning application. The Draft Local Plan identifies a need for up to 34 additional secondary school forms of entry over the plan period. The proposed Eden Park High School has the potential to meet some of this need, but is not subject to a draft site allocation in the Draft Local Plan.

The applicant states that the Ravensbourne School has been chosen for the temporary accommodation for the following reasons:

- Access to shared facilities with Ravensbourne School
- Connection to existing services (including electricity and drainage); and
- A central location that is easy to reach from Beckenham because it has existing and well-established routes serving the Ravensbourne School

It has been suggested in the local representations that the temporary school should be located on the proposed permanent site, however the proposed arrangement would provide temporary educational facilities at an existing school site, which would allow the existing school facilities to be utilised to ensure an acceptable quality of education provision for the two year period for which planning permission is sought.

With regard to the Urban Open Space designation, the proposed development would be related to the existing use and is therefore supported in principle in accordance with UDP Policy G8. Policy G8 also requires that any development proposal does not unduly impair the open nature of the site, and that where built development is involved, the Council will weigh any benefits being offered to the community, such as new recreational or employment opportunities, against a proposed loss of open space. In this case, the proposal would result in a loss of open space, although this would be for a temporary period only. There are

nonetheless benefits to the community in the form of the temporary educational facilities to assist in meeting the significant demand for school places in the Borough, which would outweigh the loss of open space in this instance.

With regard to the impact of the development on the open nature of the site, there would be some harm given the scale of the building and its siting, which would be prominent in views from Hayes Lane and across the playing fields from the north, however this would be for a temporary period only, and following the cessation of the use, the building would be removed and the land restored to its former condition. This can be secured through the use of a planning condition.

In respect of the impact on playing fields, the proposed building would be positioned on existing playing field land to the north of the school's MUGA. UDP Policy L6 states that the loss of sports grounds or playing fields will not be permitted, except where the Council's assessment of open space provision has revealed a surplus of playing fields. In this case, the proposal would result in a partial loss of playing fields and sports facilities, for a temporary period. There would however continue to be extensive playing field land on the site whilst the temporary building is in place and it is not anticipated that the development would unduly harm the sporting use of the school site.

The application has been referred to Sport England for comment, who have advised that whilst the application does not strictly accord with their playing fields policy, a flexible approach has been adopted with the siting of temporary structures where there is no undue impact on the sporting use of the playing field, and once temporary structures are removed, that the land is restored to playing field quality. This can be secured by condition.

On balance, it is considered that the proposed development is acceptable in principle, subject to more detailed consideration of the character, amenity and highways impacts.

The impact of the development on local character

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.

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 proposed building is utilitarian in character and appearance which is acceptable on the basis that planning permission is sought for a temporary period only. The permanent works proposed in the form of the new steps and ramps will result in a minimal impact on the wider character of the area, but will ensure

inclusive access to the proposed development and, beyond its lifetime, the playing fields and MUGA.

The impact on the setting of the Grade II listed school building

In policy terms the application falls to be considered against policies BE8 of the UDP and Policy 7.8 of the London Plan. These policies seek to identify heritage assets so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account. UDP Policy BE8 states that applications for development involving a listed building or its setting will be permitted provided that the character, appearance and special interest of the listed building are preserved and there is no harm to its setting.

In addition the NPPF para 132 states that 'great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Paragraph 134 states that 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use'.

In this case, the proposal includes built development close to the main school building which is Grade II listed. The proposed temporary building would be likely to have an impact on the setting of the listed building for the 2 year period for which planning permission is sought, given its scale and siting. This would be considered 'less than substantial harm' to the setting of the heritage asset, particularly given the temporary period for which planning permission is sought. In this instance there are significant public benefits through the provision of additional school places that would outweigh the limited and temporary harm, and on balance this aspect of the scheme is considered to be acceptable. The proposed permanent works to provide steps and a ramp would replace existing steps in a similar location, and would result in minimal impact on the setting of the listed building.

The impact on the amenities of neighbouring dwellings

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. London Plan Policy 7.15 states that development proposals should seek to manage noise by (inter alia) avoiding significant adverse noise impacts on health and quality of life as a result of new development.

The proposed building is well separated from neighbouring dwellings and it is not expected that the proposed development would give rise to a significant impact on the amenities currently enjoyed by surrounding residents. Whilst there is likely to be a degree of additional noise and disturbance arising from the increase in pupil numbers, and associated movements to and from the site including increased

pedestrian activities in surrounding residential roads, this is likely to be dispersed across the surrounding area and is not expected to give rise to a significant loss of amenity.

With particular regard to noise impacts arising from the proposed generator, Environmental Health advise that a plant noise emission criteria is recommended for the diesel generator and a barrier is necessary to meet this. This can be secured by condition to safeguard the amenities of neighbouring residents and ensure a satisfactory learning environment for the future pupils at the school.

Traffic and parking issues

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. Car parking standards within the UDP and London Plan should be used as a basis for assessment.

The introduction of an additional 360 pupils on site over the 2 year temporary period could have the potential to result in a significant impact on the local highway network, particularly as a result of drop off and collection by parents by car, noting the location of the school as remote from the proposed permanent location of the Academy in Beckenham. The applicant has undertaken a mode share study to establish the travel modes for existing Ravensbourne School pupils, which states that car journeys (including car share) represent 13.7% (am) and 11.6% (pm) of the mode share. The majority of journeys (58.2% (am) and 60% (pm)) are made by public bus. Based on this, it is anticipated that in Year 1 of the temporary accommodation on the journey to School there would be demand for drop-off from 24 vehicles (including 8 persons car sharing in four vehicles). In Year 2 this will increase to 49 with car sharing occurring in the same proportion. In the afternoons, demand for collection would be 20 (including 8 persons sharing in four vehicles). In Year 2 this would increase to 39.

However, noting the remote nature of the site from the proposed permanent location, an alternative mode share scenario based on longer travel distances has been developed. This utilises travel census data from two non-selective schools (where admissions are not based on distance and journey times are longer) in the Borough (Newstead Wood School for Girls and St Olave's), both of which are located in areas with poor accessibility to public transport, in comparison to the

Ravensbourne School which has a moderate PTAL rating. In year 1, the School is expected to generate demand for drop-off from 26 vehicles in the morning and 21 vehicles in the afternoon. In year 2 this would increase to 52 in the morning and 42 in the afternoon. Despite the lower public transport accessibility level and the non-distance based criteria for the non-selective Schools, the mode share statistics are comparable.

Parking beat surveys undertaken by the applicant have identified limited spare on-street parking capacity in the vicinity of the site in residential roads to the north (Sandford Road and Cromwell Avenue), however it has been confirmed that by Year 2 the demand for parking would exceed availability resulting in parking stress. It is also acknowledged by the applicant that Hayes Lane has no residual capacity to absorb additional parking demand.

Accordingly the applicant has explored alternative options to facilitate off-street set down and pick up facilities, including the provision of a coach service setting off from the vicinity of the catchment area for the permanent site (exact location to be confirmed). The deliverability of such a service has not been confirmed however, and accordingly the applicant has sought to provide an on-site drop off and collection area to mitigate the impact of the development. The proposed arrangement is for parents to enter the site via the main Hayes Lane access and drop off and wait to collect pupils in an existing area of hardstanding in a central courtyard area within the main school building complex. Vehicles would then exit back onto Hayes Lane via a separate access to the north-west. In the mornings (7:50am - 8:20am), the area would only be used for drop off with minimal dwell time. In the afternoons (5pm - 5.30pm) parents/guardians would be able to park and wait to collect pupils. An additional area for parking would be available in the existing school car park should demand exceed capacity at this time.

This part of the site is currently used for outdoor play and congregation, although its use for curriculum based activity this does not occur until after 10am on any day and finishes prior to the Ravensbourne's School day at 3.25pm. Children currently use the area to congregate before the start of the school day (8.30am registration) and it will therefore need to be demonstrated that the proposed use of the area would not conflict with this and give rise to safety concerns. It is proposed that the operation would be marshalled to ensure safe and efficient movement of vehicles through the site.

With regard to staff travel and parking demand, the applicant submits that around 10 additional staff members will be required for the temporary school (with 80% of the staffing requirements for temporary classrooms undertaken by existing Ravensbourne School staff). The applicant submits that any additional staff parking can be accommodated within the existing Ravensbourne School car park.

Having regard to the above, it is considered that the development would not result in a significant impact on the operation of the local highway network, provided that the proposed on-site drop off and collection arrangements are implemented prior to the first use of the temporary school and retained in operation for the duration of the temporary planning permission. This, together with the final details of the operation of the drop off and collection arrangements, can be secured by condition.

It is further recommended that a Travel Plan, to encourage the use of sustainable travel modes throughout the temporary period, is secured by condition.

In addition and noting the comments received from local residents, it is recommended that a Construction Logistics/Management Plan be secured by condition to ensure that the construction works do not unduly impact on the local highway network or amenities of local residents.

Other technical matters

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 application includes an energy strategy which indicates that a 1% reduction in carbon emissions (over the Building Regulations Target Emission Rate (TER)) could be achieved through passive measures including enhanced thermal efficiency in the proposed building. This would not comply with the requirements of the London Plan which seeks a 35% reduction of the TER, although it is acknowledged that the ability of the development to achieve this target is limited by virtue of its temporary nature. Nevertheless it is recommended that a revised strategy is secured by way of a planning condition to seek to achieve the highest level of carbon emissions reduction as possible.

Air quality

London Plan Policy 7.14 requires development to minimise increased exposure to existing poor air quality and make provision to address local problems of air quality, particularly within Air Quality Management Areas (AQMAs) and where development is likely to be used by large numbers of those particularly vulnerable to poor air quality (such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes.

The application site lies within the AQMA and the combustion of diesel as proposed through the use of a generator will give rise to air pollutants, particularly oxides of nitrogen (NOx), which convert to nitrogen dioxide (NO₂) in the air. To protect the amenities of nearby residents conditions are recommended to secure the implementation and testing of NOx abatement equipment to ensure its effectiveness, in compliance with London Plan Policy 7.14.

Drainage

Policy 5.13 of the London Plan requires development to utilise SUDS, unless there are practical reasons for not doing so though supporting text to the policy also recognises the contribution 'green' roofs can make to SUDS. The hierarchy within that policy is for a preference for developments to store water for later use.

In this case as the proposed development is for a temporary building, it would not be considered practical or proportionate to provide a SUDS system. No technical objections have been raised to the proposal from the Council's Drainage Advisor nor from Thames Water.

Summary and conclusion

The proposed development would result in a degree of impact to the designated Urban Open Space, playing fields and sports provision, and the setting of the Grade II listed school building, however in this instance it is considered that there are significant public benefits in the form of the additional school places, which would outweigh any temporary harm. It is recommended that any grant of planning permission is conditional to specify that the school should not operate before the start of the academic year in 2017 and that the building should be removed from the site and the land reinstated to its former condition following the end of the 2019 academic year.

It is not anticipated that the development would give rise to a significant loss of amenity to local residents, to the extent that planning permission should be withheld.

Subject to conditions to secure the implementation of the on-site drop off and collection arrangements for the school, it is not anticipated that the development would result in a significant residual impact on the operation of the local highway network.

Having regard to the above, it is considered that the proposed development is acceptable on balance and accordingly it is recommended that Members resolve to grant permission for the temporary use subject to recommended conditions.

Background papers referred to during production of this report comprise all correspondence on the file ref(s) set out in the Planning History section above, excluding exempt information.

RECOMMENDATION: PERMISSION

Subject to the following conditions:

- 1 The building hereby permitted shall be removed from the site on or before the 30th November 2019. In the first planting season following removal, the playing field land shall be reinstated to a playing field of a quality at least equivalent to the quality of the**

playing field immediately before the development was erected in accordance with 'Natural Turf for Sport', (Sport England, 2011).

REASON: In order that the situation can be reconsidered in the light of the circumstances at that time in the interest of the amenities of the area, and to ensure that the site is restored to a condition fit for purpose, to comply with Policies BE1, BE8, G8 and L6 of the Unitary Development Plan.

- 2 Before the development hereby permitted is commenced, details of the proposed on-site drop off/collection arrangements as set out in the submitted Transport Response (Robert West, July 2016 ref. 2915/042/R03 REV A) shall be submitted to the Local Planning Authority for approval. The submission shall include (but not be limited to) details of any permit scheme proposed and details of the number and location of marshalls to be deployed.

The on-site pupil drop-off/collection arrangements shall be implemented before the first occupation of the development hereby permitted and retained and operated in accordance with the approved details for the duration of this planning permission.

REASON: To ensure the delivery and safe operation of the proposed measures to mitigate the impact of the development on the local highway network with particular regard to on-street parking congestion, in accordance with Policy T18 of the Unitary Development Plan.

- 3 The building hereby permitted shall not be occupied by pupils before the start of the 2017/2018 academic year in September 2017.

REASON: To comply with the terms of the application in seeking planning permission for the use of the building for two academic years.

- 4 No development shall commence until a scheme to ensure the continuity of the existing sports use of the playing fields and sport facilities shown on Drawing No. 00 00, during construction works and the temporary siting of the school including its removal and land restoration, is submitted to and approved in writing by the Local Planning Authority, after consultation with Sport England. The scheme shall ensure that the sports facilities remain at least as accessible and at least equivalent in terms of size, usefulness, attractiveness and quality to the existing sports facilities and shall include a timetable for implementation. The approved scheme shall be implemented and complied with in full throughout the carrying out of the development.

REASON: To protect playing fields and sports facilities from damage, loss or availability of use and to accord with Policy L6 of the Unitary Development Plan.

- 5 The development hereby permitted shall not be carried out otherwise than in complete accordance with the following plans and supporting documents approved under this planning permission unless previously agreed in writing by the Local Planning Authority:

Site Plan - 100 01 00 Rev B

Location Plan 100 00 00

Proposed site plan with generator compound - P1512052-Y-DR-010-XX-00-0001 Rev 1

Proposed elevations and sections - P1512052-Y-DR-020-XX-00-0002 Rev 3

Proposed Ground Floor Plan with Module Layout - P1512052-Y-DR-010-XX-00-0000 Rev 5

Proposed First Floor Plan with Module Layout - P1512052-Y-DR-010-XX-01-0001 Rev 3

Existing and Proposed Stairs and Ramp Details - 100 04 00

Proposed Ramp Details - 100 04 01 Rev A

Topographic Surveys - L7154/T/1-3

Topographic Surveys - L7154/T/2-3

Topographic Surveys - L7154/T/3-3

External Finish of the Temporary Building (Image)

Planning Statement (JLL, October 2016)

Transport Statement (Robert West, October 2016)

Desk Study (Momentum, December 2016)

Design and Access Statement (Innes Associates, December 2015)

Acoustic Feasibility Report (Cole Jarman, April 2016)

REASON: For the avoidance of doubt and to ensure the satisfactory implementation of the development in accordance with Policy BE1 of the Bromley Unitary Development Plan

- 6 The development shall be carried out in compliance with the plant noise emission criteria detailed in Table T4 of Cole Jarman acoustic report 15/0647/R1 Revision 2.

REASON: To provide a satisfactory learning environment for pupils and protect the amenities of neighbouring residents, to comply with Policies BE1 and C7 of the Unitary Development Plan and Policy 7.15 of the London Plan.

- 7 Prior to the commencement of development, details of the windows and roof construction to insulate the development against external

noise and rainfall noise (including details of acoustically treated background ventilation) shall be submitted to and approved in writing by the Local Planning Authority. The measures shall be implemented in accordance with the approved details prior to first occupation and retained for the lifetime of the development.

REASON: To provide a satisfactory learning environment for pupils and to comply with Policy C7 of the Unitary Development Plan and Policy 7.15 of the London Plan.

- 8** Prior to the commencement of development, details of an acoustic barrier to the proposed plant equipment shall be submitted to and approved in writing by the Local Planning Authority. The barrier shall be installed in accordance with the approved details before the plant first becomes operational and shall be retained for the lifetime of the development.

REASON: To safeguard the amenities of neighbouring residential properties in accordance with Policy BE1 of the Unitary Development Plan and Policy 7.15 of the London Plan.

- 9** The diesel generator shall not be operated without the fitting of suitable NOx abatement equipment. Before the installation of the diesel generator details of NOx abatement equipment including technical data and manufacturers certification shall be submitted to and approved in writing by the Local Planning Authority. The NOx abatement equipment shall be installed in accordance with the approved details and retained for the lifetime of the development.

Once the diesel generator becomes operational an emissions test shall be carried out to ensure the emissions of NOx have been reduced. The results shall be submitted to the Local Planning Authority for approval within one month of the first use of the generator.

REASON: In the interest of improving air quality and to comply with Policy 7.14 of the London Plan.

- 10** Before any part of the development hereby permitted is first occupied, bicycle parking (including covered storage facilities where appropriate) shall be provided at the site in accordance with details to be submitted to and approved in writing by the Local Planning Authority, and the bicycle parking/storage facilities 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.

- 11 Prior to the commencement of the development hereby permitted a Construction Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan shall include measures of how construction traffic can access the site safely and how potential traffic conflicts can be minimised; the route construction traffic shall follow for arriving at and leaving the site and the hours of operation, but shall not be limited to these. The Construction Management Plan shall be implemented in accordance with the agreed timescale and details.

REASON: In order to comply with Policy T5, T6, T7, T15, T16 & T18 of the Unitary Development Plan

- 12 Prior to the commencement of the use hereby permitted, a Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan should include measures to promote and encourage the use of alternative modes of transport to the car. It 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

- 13 Before any works on site are commenced, a site-wide energy strategy assessment shall be submitted to and approved by the Local Planning Authority. The results of this strategy shall be incorporated into the final design of the buildings prior to first occupation.

REASON: In order to seek to achieve compliance with the Mayor of London's Energy Strategy and to comply with Policy 5.2 of The London Plan.

- 14 The on-site pupil drop-off/collection arrangements shall be implemented before the first occupation of the development hereby permitted and retained and operated in accordance with the approved details for the duration of this planning permission.

REASON: To ensure the delivery and safe operation of the proposed measures to mitigate the impact of the development on the local highway network with particular regard to on-street parking congestion, in accordance with Policy T18 of the Unitary Development Plan.

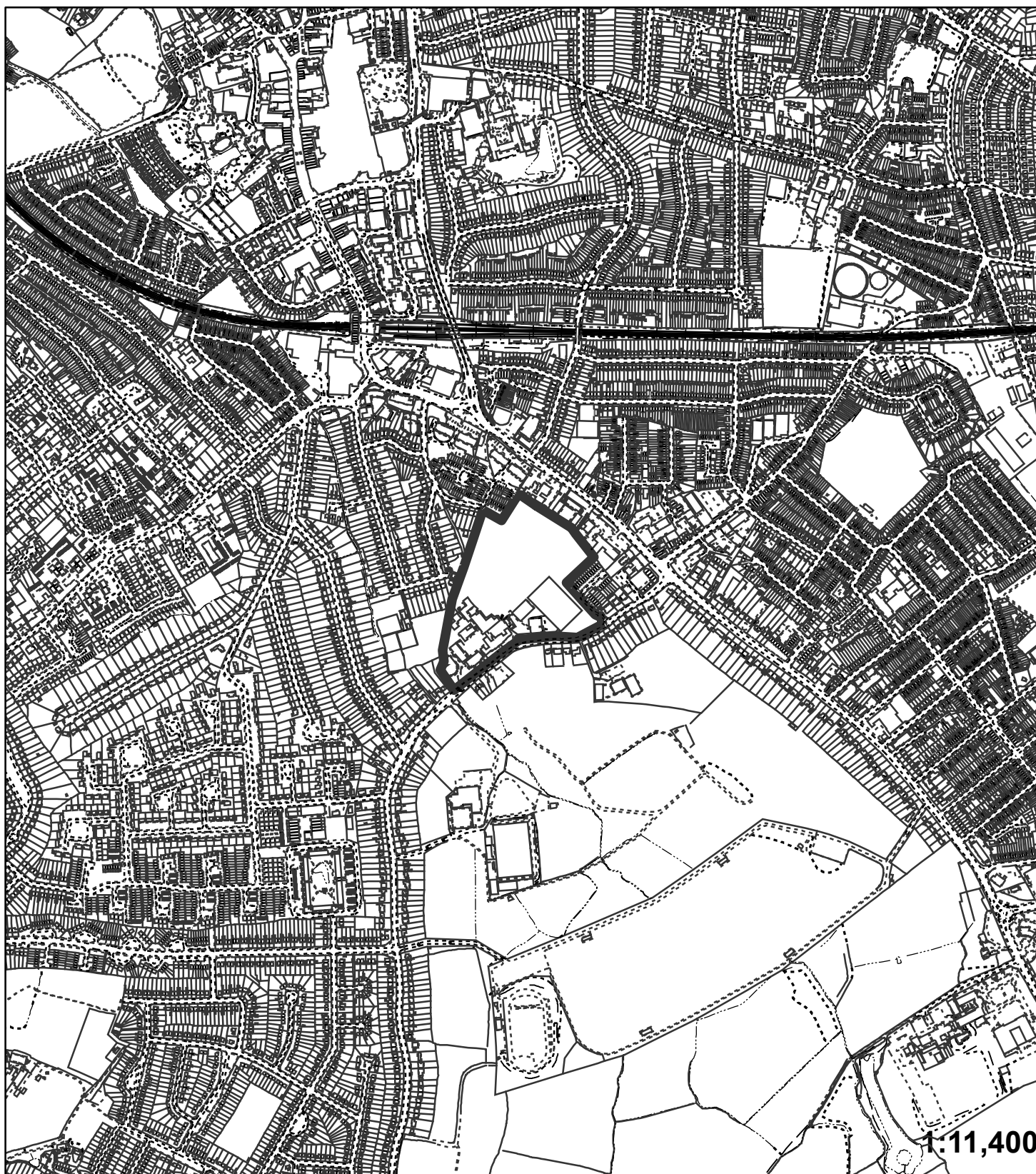
You are further informed that :

- 1** It is recommended that a restoration scheme for playing field land is undertaken by a specialist turf consultant. The applicant should be aiming to ensure that any new or replacement playing field is fit for its intended purpose and should have regard to Sport England's technical Design Guidance Note entitled "Natural Turf for Sport" (2011) and relevant design guidance of the National Governing Bodies for Sport e.g. performance quality standards produced by the relevant pitch team sports, for example the Football Association.
- 2** Before works commence, the Applicant is advised to contact the Pollution Team of Environmental Health & Trading Standards regarding compliance with the Control of Pollution Act 1974 and/or the Environmental Protection Act 1990. The Applicant should also ensure compliance with the Control of Pollution and Noise from Demolition and Construction Sites Code of Practice 2008 which is available on the Bromley web site.
- 3** 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.
- 4** Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
- 5** 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. In respect of surface water it is recommended that 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. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

Application:16/04712/FULL1

Address: The Ravensbourne School Hayes Lane Hayes Bromley BR2 9EH

Proposal: Temporary siting of a two-storey structure for educational use (Class D1) for two academic years (until 31 July 2019) and associated external works including access ramp and stairs.



"This plan is provided to identify the location of the site and should not be used to identify the extent of the application site"

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Report No.
DRR17/010

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: **Development Control Committee**

Date: **25 January 2017**

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

Title: **Addendum to Bromley’s Planning Obligations Supplementary Planning Document (2010 as amended): - Establish Carbon Offset Contributions – payments in lieu of on-site provision**

Contact Officer: Mary Manuel, Head of Planning Strategy
Tel: 020 8313 4303 E-mail: mary.manuel@bromley.gov.uk

Chief Officer: Jim Kehoe, Chief Planner
Tel: 020 8313 4794 E-mail: jim.kehoe@bromley.gov.uk

Ward: All wards

1. Reason for report

- 1.1. This report proposes an Addendum to the Planning Obligations SPD to ensure that payments in lieu of on-site provision for carbon offsetting purposes are made in conformity with LB Bromley and London planning and national policies and guidance on carbon reduction for new major developments.
- 1.2. Where these carbon dioxide reduction targets cannot be met on-site, this obligation will require developers to make payments to the Council to implement energy efficiency measures (to reduce carbon emissions) elsewhere to achieve the shortfall between the developer’s proposal and the policy objectives.

2. **RECOMMENDATIONS**

That Development Control Committee:

- 2.1. Approves the Addendum to the Planning Obligations SPD as shown at Appendix One, with immediate effect, for the purposes of meeting local and regional policies and guidance on carbon offsetting, in particular for payments *in lieu*.
- 2.2. Approves the carbon offset price of £60 per tonne of carbon dioxide for a period of 30 years.

Impact on Vulnerable Adults and Children

1. Summary of Impact: Not Applicable
-

Corporate Policy

1. Policy Status: New Policy
 2. BBB Priority: Excellent Council Quality Environment Vibrant, Thriving Town Centres
-

Financial

1. Cost of proposal: N/A
 2. Ongoing costs: N/A
 3. Budget head/performance centre: N/A
 4. Total current budget for this head: N/A
 5. Source of funding: N/A
-

Personnel

1. Number of staff (current and additional):
 2. If from existing staff resources, number of staff hours:
-

Legal

1. Legal Requirement: Statutory Requirement Non-Statutory - Government Guidance None: Further Details
 2. Call-in: Applicable Not Applicable: Further Details
-

Procurement

1. Summary of Procurement Implications: Projects will follow Council's CPR's
-

Customer Impact

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

Ward Councillor Views

1. Have Ward Councillors been asked for comments? Not Applicable
2. Summary of Ward Councillors comments: Not Applicable

3. COMMENTARY

Summary

- 3.1. The London Plan 2016 (Policy 5.2) requires developers to reduce carbon emissions associated with major new residential and non-residential developments. On 1 October 2016 this target increased and it will become more difficult for some developments to meet this requirement on-site. The policy states that any shortfall may be provided off-site or through a payment *in lieu* contribution to the relevant borough. Payments may be secured through Section 106 agreements and contribute towards funding local carbon reduction projects off-site.

Policy Context

- 3.2. The London Plan sets out increased carbon reduction targets for new major developments. From 1 October 2016:
- *Residential* developments are required to be ‘zero carbon’
 - *Non-residential* developments are required to achieve a continued 35% reduction against Building Regulations 2013 ‘Part L’
- 3.3. ‘Zero Carbon’ homes (GLA Energy Planning Guidance: March 2016) must achieve a minimum 35% reduction in regulated carbon dioxide emissions (beyond Part L 2013) on-site. If the remaining emissions (65%) cannot be reduced on-site, they should be offset through a payment to the relevant borough, into a ring-fenced fund, to secure the carbon reduction off-site.
- 3.4. LB Bromley has been using the London Plan policies on energy and carbon since 2009. Since then, the majority of major developments have successfully achieved the carbon reduction targets required by the London Plan but there have been cases where a pragmatic approach has been needed – usually due to particular physical on-site challenges or listed buildings.
- 3.5. The emerging Local Plan has included the ‘carbon offsetting’ principle since 2014 and the Council’s carbon reduction policy has recently been updated for the Draft Local Plan Consultation to ensure that the Council’s intentions are clear.

Payments in lieu for Carbon Offset purposes

- 3.6. The specific amendments of the Planning Obligations (S106) SPD are set out in Appendix One. Where a carbon shortfall is identified in a development proposal, the Council will need to agree (with the developer) that a payment *in lieu* is made. The use of payments *in lieu* may make it easier and quicker for some developments to meet the policy requirements but the Council will need to be satisfied that every effort has been made achieve the targets on-site first.
- 3.7. It is proposed that the Council should use the Mayor’s established carbon offset price of £60 per tonne of carbon dioxide for a period of 30 years (£1,800/t lifetime price) as the GLA guidance states that where the borough applies a carbon dioxide off-set price of £60 per tonne, it is not considered necessary for boroughs to carry out a further viability assessment of the policy approach.
- 3.8. Carbon emissions associated with new developments should be calculated by the developer using the guidance and information set out in Sections 7 and 8 of the GLA Guidance on Preparing Energy Assessments (March 2016). These calculations will be verified by the Council prior to any payments being made.
- 3.9. The decision of when to collect the payment will be made on a case-by-case basis, with smaller developments potentially paying on commencement but having a phased approach to payments for larger developments.

3.10. In order to comply with CIL Regulations on 'Pooling' of planning obligation s106 contributions, there may be a need to identify specific projects before the s106 obligation is completed. These should normally be identified from existing or future approved spending plans of the Council and subject to the Council's Financial Regulations.

4. POLICY IMPLICATIONS

4.1 LB Bromley's Planning Obligations SPD will be amended to reflect the London Plan and Bromley's emerging Local Plan.

5. FINANCIAL IMPLICATIONS

5.1 The Council will collect payments in lieu for carbon reduction purposes via s106 agreements

6. LEGAL IMPLICATIONS

6.1 Planning obligation contributions will be subject to the CIL Regulations.

7. PROCUREMENT IMPLICATIONS

7.1 Procuring carbon offset projects will follow the Council's Contract Procedure Rules.

Non-Applicable Sections:	IMPACT ON VULNERABLE ADULTS AND CHILDREN PERSONNEL IMPLICATIONS
Background Documents: (Access via Contact Officer)	The London Plan 2016 (Policy 5.2) Greater London Authority Guidance on Preparing Energy Assessments (March 2016) Draft Local Plan (November 2016)

REPORT No. DRR17/010

ADDENDUM (January 2017) TO COUNCIL'S:

ADOPTED SUPPLEMENTARY PLANNING DOCUMENT PLANNING OBLIGATIONS (2010)

Chapter 3 Topic areas for which obligations should be sought where they are directly related to the proposed development.

Section – 'Mitigation of Environmental Impacts on air, soil and water'

Page 25 –

Insert new paragraph 3.49

3.49 The London Plan 2016 (Policy 5.2)¹ requires developers to reduce carbon emissions associated with major new residential and non-residential developments. On 1 October 2016 this target increased in line with improvements to Part L of the Building Regulations², and it will become more difficult for some developments to meet this requirement on-site. The policy states that any shortfall may be provided off-site or through a payment in lieu contribution to the relevant borough. Payments may be secured through Section 106 agreements and contribute towards funding local carbon reduction projects off-site.

Appendix 1 Summary of Planning Obligations and Costs Table

Add to current subject area text as stated in bold below.

Subject	Threshold	Criteria	Types of obligation sought where they are directly related to the proposed development	Formula	Detail
Mitigation of environmental impacts on air, soil and water	Any development may have an impact. Add: Carbon Offset = Major developments.	Borough-wide	Add: Carbon Offset: Where carbon reduction targets cannot be met on-site or off-site, developers will be required to make a payment in lieu.	Add: Carbon Offset = £60 per tonne of carbon dioxide for a period of 30 years (£1,800/t lifetime price).	Add: London Plan 2016, Minimising Carbon Dioxide Emissions (Policy 5.2).

¹ The London Plan 2016 (Policy 5.2)

² GLA Energy Planning Guidance March 2016

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