



Councillor Peter Morgan  
Portfolio Holder for Renewal & Recreation  
LONDON BOROUGH OF BROMLEY

Free Schools CfBT Trust  
60 Queen's Road  
Reading, RG1 4BS

19<sup>th</sup> December 2013

Dear Sirs,

### **Stage One Bromley Bilingual School Consultation**

Thank you for the opportunity to respond to Stage One of the Bromley Bilingual School consultation. We have focused our consultation response on the proposed location of the school in respect to the adopted planning framework for the site and implications for wider town centre development.

### **Planning and Development Issues**

The Westmoreland Road site proposed for the new school is designated an Opportunity Site within the Adopted Bromley Town Centre Area Action Plan (AAP 2010). The Plan, through a combination of site allocations and specific policy requirements, seeks to make provision for planned growth and development over the next 15 years in order to strengthen Bromley's competitive position. The Plan has been through rigorous public consultation and an independent public examination in front of a planning inspector before being adopted by the Council in October 2010.

Policy OS1 of the AAP acknowledges that the Westmoreland site could play a key role in the re-provision of high quality office floor space, which is needed to provide balance growth in the town centre. In terms of supply, there is a marked deficit in quality Grade-A space and this lack of Grade A stock is an on-going disincentive to investment and employment growth in Bromley. Over the course of the last three years Council officers have negotiated with the previous site owners to agree an acceptable development land use mix for this site that included offices and this was approved by the Council Planning Committee on 8<sup>th</sup> October 2013. If this development were to have come forward it would have represented the first major office development in the town for over 20 years and would have consolidated Bromley South as the Borough's principle office location. The failure to bring forward this site for offices uses will have a negative impact on how the market views Bromley as a viable office location and represents a wasted opportunity to support balanced employment growth in the town.

## Highways Issues

Policy BTC23 of the AAP safeguards land within the selected site as the only southern approach to the Town Centre. The safeguarded land is for transport and bus priority improvements at the Masons Hill/Westmoreland Road junction (map attached). The AAP and supporting Transport Strategy make clear that transport improvements are required for the implementation of Phase Three of the AAP which focus on providing better quality retail shops in a new development west of the High Street. The need for such improvements has become even more pressing with the recently approved plans for the expansion of both Croydon town centre and Bluewater. Given this, the southern approach is absolutely vital to upholding the AAP policies and maintaining the Town Centres prosperity.

The Southern Approach junction is currently over capacity. The Council's modelling has shown that in both the weekday AM peak and PM peak, and Saturdays, the junction is severely over capacity by as much as 72% and virtually all the arms of the junction experience severe traffic congestion at some point, notwithstanding any generated traffic from the proposed school development.

As part of the previous planning permission granted for the site on 8<sup>th</sup> October 2013, officers negotiated with the applicant a design for the junction, which would have significantly reduced to levels where traffic congestion would still exist, but would be much less severe. A preliminary assessment by the Council's Highway Engineers has suggested that it would prove difficult to accommodate these improvements and retain the current building line without undertaking significant and expensive development works.

In addition to the general traffic congestion issue above, there is the addition impact of the proposed school development itself. Experience with the majority of schools across the Borough suggests that a significant proportion of children will arrive by car. This would place additional pressure on the junction. It is understood that the school is likely to be 3FE, plus around 60 staff, meaning there could be in excess of 200-275 vehicle movements associated with the development based on 40-45% car mode share, which is based on the mode share in all Bromley Primary schools from surveys undertaken by the Council. Given the likely in-take area for this school, this is probably a conservative estimate.

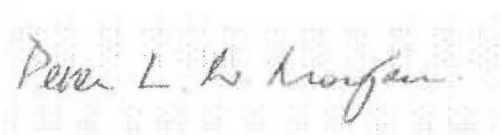
The Council is currently unaware of the School's proposal to deal with any parking impacts as it has not submitted any scheme details to the Council for comment. However, given the junction layout and site access point there is a concern that site servicing and drop off parking could be a major issue. There is a concern that given the number of vehicles loading and unloading trips generated these may not be able to be accommodated on local roads, and would be totally unacceptable on Westmoreland Road or Masons Hill anywhere near the junction. Again experience suggests that parents routinely ignore traffic and parking legislation in order to pick up/set down their children.

## School Places

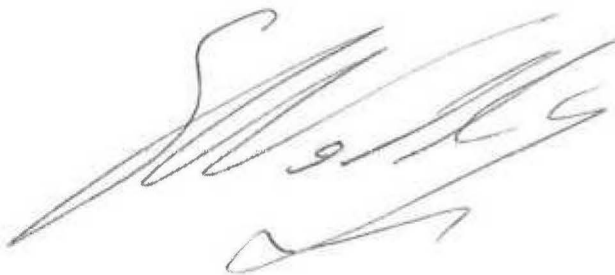
The Council acknowledge that the that new school places proposed at the Bromley Bilingual Free School, along with those proposed at Harris Shortlands Primary Free School and Harris Beckenham Primary Free School could make an important contribution to the provision of sufficient school places across the Borough from September 2014 onwards. The Council is supportive of Free School developments in the Borough and has been keen to work with potential providers to identify suitable sites. For example we have worked closely with the promoters of the Harris Shortlands Primary Free School and by agreeing Heads of Terms on a lease of the former Kingswood House to Harris, we have enabled the redevelopment of the site as a new school. However, the view of the Council is that 1 Westmoreland Road is not suitable for a 3FE primary school, located as it is on a major road junction and on a site allocated as a key development site in the town planning framework. If the Council had been consulted on the proposal prior to the Education Funding Agency deciding to purchase we would have expressed our concern that this site is not appropriate for this use.

Thank you again for the opportunity to comment on your phase one consultation and we would welcome the opportunity to discuss this matter further.

Yours sincerely



Councillor Morgan  
Portfolio Holder for Renewal & Recreation



Councillor Wells  
Portfolio Holder for Education

CC Councillors Stephen Carr & Colin Smith