

SECTION '2' – Applications meriting special consideration

Application No : 14/02667/FULL1

Ward:
Shortlands

Address : Kingswood House Mays Hill Road
Shortlands Bromley BR2 0HX

OS Grid Ref: E: 539495 N: 168950

Applicant : Mr J McFarland

Objections : YES

Description of Development:

A two form entry primary school, involving the demolition of all existing buildings together with the erection of a two storey building with associated vehicular access, parking and landscaping

Key designations:

Biggin Hill Safeguarding Birds
Biggin Hill Safeguarding Area
London City Airport Safeguarding
London City Airport Safeguarding Birds

Proposal

Planning permission is sought for a two form entry primary school, involving the demolition of existing buildings together with the erection of a two storey building with associated vehicular access, parking and landscaping.

The application is submitted on behalf of The Harris Foundation and is for a two form primary school and will provide 420 school places. This includes two reception year classrooms and twelve classrooms for years 1 to 6, an assembly hall, studio, group rooms and specialist teaching areas and ancillary spaces. The new school is to be a Free School.

Revised plans were submitted on the 3rd October indicating a total of 22 car parking spaces fronting May Hill Road together with a revised transport technical note.

The main entrance to the school will be located on Kingswood Road. Year 2 to 6 access will be from Mays Hill Road. There is a small car park accessed from Kingwood Road. (This to provide disabled car parking facilities)

This proposal includes an hard play area, covered play area, cycle parking area and landscaping areas. The main playground is positioned behind the school building.

The building materials proposed includes a palette of render, coloured render, timber and coloured cladding panels.

A number of mature existing trees are being retained as part of the proposal and on the south western boundary additional planting is being introduced. The very steep north western corner will be largely unchanged with the tree planting retained and used as a supervised external learning area. A new planting area and habitat will be created on the 5 way junction corner in front of the proposed hall. The proposal has been designed despite being on a steep site to ensure level entry.

The application is accompanied by a technical report to address highways issues. The addendum report outlines the revised mode split and trip generation methodology based on travel plan data provided, and sets out the revised transport strategy to mitigate the impact of the development.

On-site parking for staff and visitors has been increased to 22 spaces. 28 cycle and 18 scooter spaces are provided for pupils and staff.

The applicants indicate in the technical highways report that the multimodal trip generation assessment of the fully occupied school shows that the proposed primary school has two clear peaks, with one in the morning between 08.00 and 09.00 and the second between 15.00 and 16.00, while the school operation is predicted to have no significant impact on the afternoon general traffic network peak hour between 17.00 and 18.00. The transport strategy outlines the impact on waiting and parking on the local highway network and has proposed two options as mitigation measures. Option 1 shows that the introduction of a limited amount of single yellow line can support the development and the existing parking pressure from residents and commuters, up to Year 2 after site opening. Should the Council deem the introduction of further restrictions necessary in the areas beyond 2017/2018 an extension of the existing CPZ is proposed. This would create on street parking capacity during the school periods.

Location

- The site is triangular in shape having an area of 0.512 ha.
- The Kingswood House site is a vacant residential care home currently owned by the London Borough of Bromley. It is located on the junction with Kingswood Road, Mays Hill Road and Valley Road.
- The site is bounded by residential development of varying age and character on all sides.
- The current buildings on site comprise a substantial two/three story building of brick and render with a tiled roof. The building is centrally located and arranged around a central courtyard.
- The topography of the site slopes steeply from the junction. There are 5 trees subject to a Tree Preservation order.

- The site is located short walk from Shortlands Station and is located along the 367 bus route with a bus stop located adjacent to the site on Kingswood Road.
- The site has no specific designation within the Unitary Development Plan.

Comments from Local Residents

Nearby owners/occupiers were notified of the application and a significant number of representations (over 100) were received. At the time of compiling this report there were approximately 80 letters of objections.

These are summarised as follows:

Objections:

- scale of the development
- impact on Traffic and parking
- impact on Built Environment
- 22 parking spaces on the site (up from 13). This is still inadequate.
- the proposed school will have a seriously detrimental impact on traffic, commuter parking and the quality of local life. Specifically
- parking still inadequate for 49 staff, many of who will be looking for parking spaces in the surrounding area
- the increased car parking provisions reduce the play area to 984.68m² hard area and 67.37m² covered area – a total 1,052.05m², compared with a previous total of 1102.90m².
- this results in 2.5m² recreational area per pupil (against 2.6).
- the site is not capable of accommodating 420 pupils (as well as 49 staff, services and visitors), and giving them the space they need;
- the proposals include “park and stride” but these figures are not counted as ‘vehicular’ trips.
- they will involve cars looking for parking spaces in the surrounding area thereby further increasing pressure on the area, on top of the commuter parking displaced by the existence of the school;
- the report states that it is proposed to monitor of street parking capacity and behaviour as part of an ongoing travel planning process. This is unacceptable as the damage to the local quality of life will already have been done;
- in proposing measures to restrict parking in the immediate area the plan also assumes “that all parking identifies as commuter parking has been displaced to other areas outside the CPZ. There is no evidence that the pressures on the surrounding area has been considered, a key part of the concerns expressed by residents;
- the plan assumes that 24% of pupils will arrive and depart by car in September 2015, and that this will reduce to just 14% when the school reaches full capacity in September 2020. This is wholly unrealistic and not supported by an evidence. Bromley’s own figures prove that 40% of the children at our local primary schools are taken by car. The figures for the

Harris free school are, if anything, likely to be higher as we know that they come from a wider catchment area;

- assessments about the impact on the junction are insufficient to support conclusions, and are not validated by external observers;
- it is assumed that a maximum drop off time will take five minutes. There is no evidence for this and we do not understand how any queuing system might work;
- figures for the numbers of children attending breakfast and after school clubs have been used to map arrival and departure times are based on experience of operation of the school in its temporary Bromley South site. It is not realistic to draw conclusions on the basis of this site or that fact that this has been operational for just a few weeks;
- the document states that cars dropping off in Mays Hill Road will proceed around to the crossroads of Mays Hill & Kingswood and then turn right down Kingswood Road. In reality they will not enter this already congested road but go straight across and down Mays Hill Road to Shortlands Road to exit the area under the railway bridge towards Bromley North. When approaching the school many vehicles will take this route in reverse to avoid queuing on Queen Anne Avenue;
- parking also needs to be controlled on Kingswood Road outside Orchard Court as its impossible to see up Kingswood Road when turning right out of Mays Hill Road.
- the Multimodal modal trip assessment is irrelevant
- pressure from EFA to find prospective buildings

In support:

- Bromley need good new schools
- the plans well thought out
- extending choice
- school places shrinking year on year
- good use for disused site
- easily accessed

The Shortland's Residents Association have submitted a 41 page document in opposition to the application together with an executive summary.

This is summarised as follows:

- The Kingswood site is completely unsuitable for the development of a primary school with proposed very high density of pupil at 420
- siting the school at Shortlands, does not prioritise school place provision in the specific areas of urgent need within borough
- the topography of the site, with its very steep gradient and overall fall of 9.5 metres will require extensive building works
- the usable area per pupil will be less than 25% recommended by the Department of Education
- building design is over intensive and bland
- lack of play area per pupil

- staggered breaks will result in unacceptable noise levels
- contrary to Unitary Development Plan
- not a sustainable development
- the transport data cannot be supported and unrealistic
- will cause traffic chaos
- parking is not sufficient
- haphazard CPZ will lead to problems elsewhere
- unsatisfactory and locally contentious way to resolve the inevitable parking problem.

The full text of comments received are available to view on the file.

The Shortlands Residents Association have commented further in respect of the amended Highways report:

They indicate it is worth commenting specifically on two issues:

- we note that the figures provided in this document show a significant increase in both arrivals and departures by car from the original submission – see comments on section 2. This gives a more realistic view of the adverse impact on both the immediate and surrounding areas;
- this revised report contains only one material change from the original submission in that it increases the parking available to staff from 13 to 22 places. Figures elsewhere in the report itself show that this remains inadequate. We calculate that there are likely to be 15 staff looking to park in our area before parents and children are brought into the equation. The expansion of on-site parking also has the unfortunate knock on effect of reducing still further the outside play area available for the pupils.

The full text of the additional comments received is repeated below:

Despite the fact that the cover sheet implies that the document has been checked and quality assured, it contains – like the original transport plan – a number of basic errors, inaccuracies and unsupported assumptions.

Local people do not have the time or resources to conduct local traffic surveys of their own, so we cannot therefore be confident that this work does not contain errors or mistakes in, for example, the application of transport planning methodologies or surveys that have not been independently verified or audited.

Indeed, the principal change to the original plan is to increase the provision for staff parking to 22 places (from 13). While this is still inadequate – see our detailed comments below - the increased car parking provisions reduce the play area to 984.68m² hard area and 67.37m² covered area – a total 1,052.05m², compared with a previous total of 1102.90m². This results in 2.5m² recreational area per pupil (against 2.6). We have already commented on the fact that the site is not capable of accommodating 420 pupils (as well as 49 staff, services and visitors), and giving them the space they need.

This revised technical note therefore leaves many unanswered questions and will do nothing to change the views of the SRA and of local people that the proposed school will have a seriously detrimental impact on traffic, commuter parking and the quality of local life.

Section 1, introduction etc.

No comments.

Section 2 – multimodal trip assessment

Tables 2.1 and 2.2: We recognise the value in using local statistics but using averages is always open to question. How can an average be applied to a specific site when this involves taking schools with very different locations, and therefore substantially different modes of travel, and averaging them. The geography of the individual site must be the most significant point in determining how pupils will arrive at school. This seems to be completely ignored.

As surveys of the pupils presently in the Westmoreland Road temporary site have been used elsewhere, why were they not used to assess the number of pupils currently arriving by car?

If the “park and stride” option means children being taken to school by car and then walking the last part of the journey, these figures should be included in the ‘vehicular’ trips listed. They will involve cars looking for parking spaces in the surrounding area thereby further increasing pressure on the area, on top of the commuter parking displaced by the existence of the school. This greatly changes the averages if all vehicle movements in the area are included as car journeys.

Table 2.3: What child departs from school between 07.00 and 0.800 not having arrived at the school (table 2.4)?

Table 2.4: The data imply that staff arrive between 07.00 and 09.00 and depart between 16.00 and 19.00. For staff this assumes that they all park at the school (in 22 spaces?) and a trip only implies a single journey. For pupils who are dropped off at the school, the data in the table suggests a trip implies a ‘double’ journey – a trip to drop off and a separate trip for the parent to drive away. Is this correct? For staff the figures for the total trips are 49 per day arrivals and 49 departures per day; for pupils there are a total of 982.9 arrivals and 986.3 departures (suggesting $2 \times 420 = 840 + 142.9 = 982.9$ arrivals for example. Presumably the 142.9 are other people – delivery, post, visitors etc.). What evidence and assumptions have been used to support this?

Para 2.10: The admin staff may arrive before 09.00 and depart after 16.00 but this would not apply to kitchen/ancillary staff. This may dilute the arrivals/departures at the peak times for ‘staff’ but increase the pupil figures. Either way, the document is unclear.

Table 2.4: What pupils arrive between 17.00 and 18.00 yet do not depart?

Table 2.5: These figures ignore the ‘park and stride’ pupils. Should they not be included – see above?

Ref Table 2.5: The pupil vehicular arrivals are now, by TPA figures, 124.6 between 08.00 and 09.00 compared with 39 previously – a significant increase! Departures between 15.00 and 16.00 are 158 compared with 44 previously.

Tables 2.3-2.5: these are difficult to interpret in any meaningful way. For example in 2.3, 'all person trips' (420 pupils) between 08:00 and 09:00 there are 523.3 arrivals and 105 departures. The data appears to have been derived from a software program and there appears to have been no external validation of its accuracy or relevance to the Kingswood House situation.

In addition, there appears to be no provision for any other arrivals or departs, for example from service vehicles. There is no estimate as to how many of these vehicles will arrive each day and there must be equivalent experience at the other four named schools.

Although the numbers are small, the report's credibility is undermined by a number of inaccuracies, for example in table 2.4 where between 07:00 and 08:00 referring to pupil trips, there are no arrivals but 1.3 departures. This cannot be explained by rounding. There are many examples of a similar nature.

Section 3 – junction capacity analysis

Paragraph 3.2: this section deals with the junction capacity analysis; this is based on what is described as a manual classified count at the junction on just one day, Tuesday, 10 June 2014. How representative was this of a normal day's activity and what external verification of the figures has been conducted?

There is other confusing material here. Should the heading before 3.14 be "Do Something Scenario (with development) 2020"? And in 3.15, should the third line last words refer to PM rather than AM according to Table 3.1?

Section 4 – transport strategy

Para 4.3: Why should it be assumed that "...administrative staff, part-time kitchen and ancillary staff, and visitors to the school are expected to have a less car dependent travel behaviour..."? This is entirely unsupported by any evidence, and if the modal split provided by the Council is used across the board, there will be demand for 35 parking spaces and only 2 available on the site, further increasing pressure on parking in the surrounding area.

Para 4.9: An on-street location is to be provided in either Kingswood Road or Mays Hill Road, for dropping off and picking up. How large is this planned to be? Just look at the situation in Pickhurst School where the road on both sides is full – and the access roads - for a considerable time. This also claims that "...Parents will not be permitted to use the car parks which will be reserved for visitors and staff" (our bold type). The car parks will be overfull with teachers and no estimate has been made of the number of visitors who will be looking to share these spaces (not that any will, in fact be available).

Para 4.10: The existing parking Stress seems irrelevant, other than to show the increase but the assumptions in 4.15 are suspect to say the least.

Para 4.11: this describes the observed parking survey area outside in 1290 m of kerb length for parking-but no clarity exactly where this is supposed to be.

Para 4.15: All the assumptions are based on the Harris school at Westmoreland House which cannot be assumed to be typical. Why not use data from the existing schools as done for the traffic analysis? For example the assumption of a 5 minute drop off time and then assuming this implies that the space is available 4 times over a 20 minute period is totally unrealistic. The assumption that "... 80% of pupils get picked up immediately at school closing time at 3.20..." is again a pipe dream.

Para 4.21: This assumes that parking on a single yellow line would be acceptable. Is it?

Table 4.3 A predicted occupancy of 98% does not allow for error in predictions!

Para 4.23. "It is proposed to monitor on-street car parking capacity and travel behaviour of staff and parents as part of the travel planning process ...". It is not acceptable to begin the project without having a fully worked out traffic and transport plan based on realistic assumptions and data, including proposals to deal effectively with displaced commuter parking.

Para 4.27: The CPZ would not cater for staff parking who "...would be prevented from obtaining business parking permits and therefore on street parking..." So where do they park if the car park is full?

Para 4.33: Note that the last line should read: "...and 94/95% between 15.00 and 16.00."

We have made the case very strongly that the introduction of a CPZ must have the knock on effect of driving commuter parking into nearby streets. Many of these are already blighted by commuter parking – Park Hill Road, Shortlands Road, Church Road and parts of Kingswood and South Hill Roads to name but a few, and no provisions have been made, or even considered, by the proposers or Bromley to deal with the additional pressures on the area from displaced commuters or staff seeking parking spaces in the area.

Section 5 – travel plan targets

Tables 5.1 and 5.2: It would present a far more realistic picture if these were adjusted to include 'Park and stride' figures as vehicular – not walking.

It is not clear what the Waiting Demand (Pupils) columns mean and the need for spaces appears to be speculative. The assumption appears to be that everybody will act in an orderly way and will find a space somewhere perhaps even a few hundred metres from the school. This is not going to happen. As we know from other local experience what will happen is double parking and parking across the drives of local residents.

Table 5.2: it is unrealistic to assume that pupil travel modes by car will fall to just 14% on full occupancy in 2020. Again, no evidence is provided to support this and we know that current rates for local primary schools far exceed these numbers. These rates will, if anything, be worse for the Kingswood House school given that we know that the demand for primary places is heavily focused on other parts of the borough.

Paras 5.4 and 5.5: these paragraphs make it clear that what is described as the “actual baseline mode share” will be determined following school travel surveys to be undertaken post-occupation. This implies that despite the volume of survey and other work presented here, the proposers have, in fact, very little idea now what will happen but will look at it again later when they are already operating the school at or near capacity. This is unacceptable given that, for local residents, the damage to their quality of life will already have been done. See above.

Section 6

Para 6.7: suggests a negligible impact on the junction. Whatever software is used, and referring back to table 2.5 we might have 124 vehicle arrivals and 158 departures at peak times. A substantial number of these vehicles will use the junction in one way or another over a short period of time and it is overly optimistic to assess the impact as being “negligible”.

Overall, the only material difference that this report makes to the original set of transport and traffic proposals is the addition of a small number of additional parking places for staff - and even these will be insufficient to meet demand. They in turn have a knock on effect of decreasing the already unacceptable playground area for the children.

This revised technical note therefore leaves many unanswered questions and does nothing to assuage the concerns of the SRA. We remain convinced that the proposed school will have a seriously detrimental impact on traffic, commuter parking and the quality of local life.

The applicant has responded to the objections in a written response which states as follows:

“A number of consultation responses have been received regarding this application, most notably an objection on behalf of the Shortlands Residents Association (SRA).

The school will be founded on a powerful vision and forward thinking ethos which will provide high quality teaching for both boys and girls between the ages of four and eleven. It will be based upon high expectations for behaviour and learning and will be brought about by having systems and processes in place that ensure good behaviour; engaging and rigorous teaching; learning and assessment combined with detailed monitoring of pupil achievement and personalised target setting.

Need for school places

Consultation responses have been received on the application regarding the need for primary school places, and thus the need for a school to be provided on the Kingswood House site. The need for additional primary school places has been identified by the London Borough of Bromley through their school places planning, which is undertaken by the Council as they have a statutory duty to provide school places. This need has also been acknowledged in the Shortlands Residents Association response to the application, where it is accepted in paragraph 1.6 that “there is an urgent need to find sufficient school places in Bromley”.

Currently without the additional school places that could be provided by the Harris Shortlands School there would be 55 children in need of school places in Bromley. The Harris Federation along with the Education Funding Agency and the London Borough of Bromley is working hard to meet this need and provide young children with a much needed school place. Further information on the need for primary school places and thus the need for the Harris Shortlands School is provided in a letter from Mr Terry Parkin, Executive Director of Education, Care and Health Services.

The National Planning Policy Framework (NPPF) and the London plan are very clear on how Local Planning Authorities should consider planning applications for new schools. The NPPF states in paragraph 72 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”. The NPPF goes on to state that “Local Planning Authorities should “take a proactive, positive and collaborative approach ... [and] they should give great weight to the need to create, expand or alter schools”.

Furthering this and specific to London, the London Plan is very clear on providing additional primary school places in London. London Plan Policy 3.18 Education Facilities supports the provision of primary school facilities adequate to meet the demands of the population. Specifically in relation to planning applications the policy states that “In particular, 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”.

Clearly the need for these additional school places has been demonstrated by the London Borough of Bromley, and in these circumstances planning policy is clear that such applications that meet an identified need should be given positive consideration.

The site

The Kingswood House site is a vacant brownfield site currently owned by the London Borough of Bromley. The re-use of a brownfield site complies with planning policy, making the best use of previously developed land, as well as being located within the community within which it will serve. The suitability of the site for a school has been fully assessed by the Education Funding Agency as part of their site selection process and procedures in procuring land, and to release funding for the lease of the site from the London Borough of Bromley, and construction of

school buildings. It should be noted that Bromley Council identified this site as one to be used to provide a school and made it available to the Harris Federation through the Education Funding Agency. Disposal of the site specifically for this use was sanctioned by the Council.

Whilst the topography of the site provides a challenge in terms of construction, a sound and feasible structural solution for the site has been developed by the structural engineers on the project. The proposed retaining wall replaces the existing retaining wall that is present on the site.

The existing former Kingswood Residential Care Home forms a retaining structure as part of its southern elevation, placing its mass at the top and middle of the site and as such presents an open aspect towards the five way junction. The proposal for the new Harris School reverses this relationship in order to achieve a number of benefits including:

- a protected play area secured by the built form of the school,*
- an enclosed rear play area out of view and separated from the five way junction*
- the built form of the proposal is positioned on the lowest part of the site meaning the overall mass of the scheme sits lower than the ridge line of the existing Kingswood House*
- the main hall is positioned on the apex of the triangular site giving a strong mass to address this junction. The internal floor level of the hall and ground floor of the school is set significantly above the road level at the junction, this has the effect of separating further the internal environment from activity beyond the site*
- The upper and steeper parts of the site will remain undeveloped but are intended to be utilised as supervised habitat areas to inspire a variety of learning opportunities. In addition the planting proposal looks to enhance and strengthen this boundary against the neighbouring residential properties where required*

The conclusion by objectors that the site is unsuitable for a school is unfounded, and based on guidance that does not form part of the statutory requirement for the free school programme. The site is suitable for a 2 form entry primary school and the plans clearly demonstrate the ability for the school to be accommodated on the site, in line with Education Funding Agency Statutory Requirements. The site would not be unstable, with the existing retaining wall on the site to be replaced.

Building design

The building has been designed taking full account of the topography and shape of the site, as set out in the Design and Access Statement submitted as part of the planning application. The architects, GSS, are experienced in designing schools and the building has been designed in conjunction with the Education Funding Agency and the education providers, the Harris Federation, to ensure that the layout and specification meets primary education needs creating an inspiring learning environment for children, and a practical and cohesive environment for staff.

The design of the building has taken into consideration the requirements set out by the Education Funding Agency and guidance contained in the Building Bulletin. The statutory requirements set out by the Education Funding Agency that have been used to design the building are appended to this letter. An Education and Design brief prepared by the Harris Federation has also been a key document influencing the design of the scheme.

The design of the building has taken account of the characteristics of the site and surrounding context, and fully complies with requirements of planning policies at national and local level. The building does not appear cramped or obtrusive in the street scene, with the proposed building being lower in height than that of the existing structure on the site, and taking advantage of the topography of the site. The building is of an appropriate scale and massing for the site and the area, not dominating the street scene and enhancing this key corner site.

The design and materials chosen are entirely appropriate and consistent with planning policy, including the London Borough of Bromley UDP Policy BE1 Design of New Development.

Key points on the building design are:

- Key stage one pupils have been positioned at ground floor level and all have direct access from their classrooms into the play areas*
- The Reception Years are afforded a separate defined hard play area on the Kingswood Road side of the building. Positioned on this side of the building it allows parents to see children enter their classes and easily and safely collect them again. This play area has been developed by pulling the building back from the Kingswood Road which in turn has also created an entrance point that allows parents, pupils and visitors off of the pavement as they pass through the first controlled secure line of the site*
- The plant room, bin store, kitchens and hall are positioned on the Mays Hill Road boundary using the built form to secure this side of the site and reduce the number of teaching spaces facing the roads*
- The remainder of year groups are clustered at first floor level which will allow year groups to work together and collaborate where required. At this floor there is access to the group rooms and specialist teaching spaces used more frequently by the older years.*
- A large hall has been provided which can accommodate all children for school meals and will be a good space for physical education able to host a range of activities. In addition to the large hall an additional studio space has been provided which will also accommodate larger groups of children. These amenities offer a variety of spaces to teaching staff in which to deliver the curriculum.*
- The staff spaces are positioned centrally at both ground floor and first floor allowing passive surveillance of circulation and external play spaces.*
- Vehicle access is available from both Mays Hill Road and Kingswood Road using existing access points from the highway. No new vehicle access will be created to the site*
- A drop off lay by will be created close to the kitchen for direct deliveries into the school*

External Play Space

The SRA and other objectors have raised concerns about the amount and location of the play space on the site. For clarification the total play space on site is 1197.68sqm, which is a combination of separate play space for reception children of 243sqm and a larger play area to the rear of the school of 954.68sqm for the remaining 320 pupils.

In addition to the formal hard play that is proposed as part of the planning application the parts of the site will remain undeveloped but are intended to be utilised as supervised habitat areas to inspire a variety of learning opportunities. Separately to the build of the school the Harris Federation will be providing both fixed and loose external play and educational equipment as part of the enhanced learning environment, which is clearly not a material planning consideration.

Objections are raised on the basis that staggered break and lunch times will be needed, and the impact this could have on the learning environment and noise levels. The EFA and the Harris Federation have both been integral to the design of this school, and although not a material planning consideration, the operation of a school with staggered break times is not an unusual concept and one that is used at a number of primary schools. The practice of staggered break times is something that the Harris Federation as the education provider will carefully manage and will be monitored.

Comments have also been received regarding the noise levels emanating from the play space at the site. The play space is located in a sunken area of the site, with enhanced planting towards the rear boundary to strengthen this boundary adjacent to the neighbouring residential properties where required. The planting scheme is outlined on the landscaping plan submitted with the planning application.

Activity at the site will take place during the day time only and on weekdays only. There will be no material disturbance to adjoining properties from children's play particularly at more sensitive times.

Highways and transport

A response on highway issues from Transport Planning Associates is appended to this application. This covers the issues raised in the objection comments.

Sustainable Development

The proposed scheme fully complies with planning policies in the London Borough of Bromley's UDP. These requirements are fully met on site. The design and layout of the building has also taken account of key sustainability factors, including:

- In the south facing elevations of the building spaces are naturally ventilated via openable windows.*
- The concrete structure will be exposed on the classroom ceilings which will be used for night time heat purging by allowing cool air to flow over it. During the day its thermal mass will reduce temperature spikes.*

- A photovoltaic array will be installed on the building's roof as a source of renewable energy
- Window heads are positioned directly underneath the concrete soffits inside the classrooms, this allows a wider angle of the brightest part of the sky to be visible allowing natural daylight to enter the rooms, and this will decrease reliance on artificial lighting.
- High quality robust building materials have been specified that will stand up to use in a busy school
- We have designed to high standards of U-value for building elements and low air leakage targets.

Ecology and Trees

An arboricultural report, ecology survey and landscaping plan have been submitted with the planning application. There a number of trees that are being removed from the site which the arboricultural report has identified are either diseased or their loss will be mitigated. The ecology report, undertaken by a qualified ecologist, identified that the habitats within the site are considered to have low ecological importance, apart from trees and shrubs that are important for nesting and foraging birds. No protected species are considered to be present on site.

The landscaping plan has taken account of the mitigation measures put forward by the arboriculturalist for the planting of at least semi-mature heavy standard trees to replace those lost. The new planting will be native species and along with these additional nature conservation measures such as bird and bee boxes will form part of the curriculum. The felling of tress will follow the recommendations of the ecologist and take place outside of the bird nesting season or with a qualified ecologist on site during the works.

The applicant is happy to receive a condition on the planning application in relation to the tree planting and ecology mitigation measures.

Contamination

A Site Investigation (SI) report has been submitted as part of the application. Comments have been received by objectors that the site should not be considered for development until further reports have been submitted. The submitted SI clearly states that limited potential hazards have been identified, and the report clearly identifies the mitigation measures that are deemed necessary on the site and will be implemented as part of the scheme.

The applicant expects, as normal in these planning situations, that a condition will be attached to any planning permission which will requiring monitoring and reporting of the ground conditions through the development, reporting to Environmental Health. 6

Construction

The site construction will follow the Control of Pollution and Noise from Demolition and Construction Sites - Code of Practice ensuring that the contractor complies with measures to limit noise and disturbance to neighbouring properties.

In addition to this, as is standard with planning application for new development, the applicant expects to have to comply with planning conditions relating to the operation of the site. From the Code of Practice, acceptable site working hours are typically Monday to Friday 08.00 to 18.00 and Saturday 08.00 to 13.00. There may however need to be some exceptions to this, however written approval will be sought from LBB prior to this.

In addition to the above, certain decisions have been made through the design process in order to reduce the potential of noise pollution causing disruption to the neighbouring properties:-

- Bored piled foundations have been opted for to greatly reduce noise pollution when compared to driven piles*
- Lightweight building systems are also being utilised on the external fabric and internal partitions in order to reduce the noise pollution when compared to more traditional building systems such as masonry construction.*

In relation to the concerns raised over 'Long Vehicle' construction traffic, it was decided at an early stage of the design process that a concrete frame was the best solution for the structural frame, as delivery lorries would be restricted to 6 wheel lorries rather than articulate lorries associated with other forms of frame construction. Ditto the bored piled foundations compared against driven piles. As outlined in the Construction Method Statement (CMS), a designated traffic marshall will control the movements of vehicles to and from site.

In relation to the storage of hazardous materials being stored on site, this will primarily be limited to tins of glues and adhesives associated with general building methods. All hazardous materials will be stored in drip trays, in a locked container and will be managed as per COSHH Regulations. There will be no risk from spillage/leakage of these materials to any of the immediate residents.

The proposed area for the Waste Management compound is highlighted on the site plan within the CMS. The segregation of waste material is in line with best practice from Site Waste Management Plan Regs (2008). We would envisage 2 to 4 skips being removed from site per week. Hazardous waste material (glues/adhesives) will be secured within sealed drums within a container until there is sufficient waste to be disposed of by a licensed operator. As above, none of the hazardous materials which will be used on site, will pose any risk to the neighbouring residents.

Security lighting on site will be positioned so as not to create a nuisance to any neighbouring properties. All site lighting will be controlled by a motion sensor photocell.

Community Involvement

The London Borough of Bromley's adopted Statement of Community Involvement (SCI) requires developers as part of the planning process to engage with planning officers, stakeholders and the local community.

As part of the process of developing the scheme for the new primary school the applicant engaged with the officers through the formal pre-application planning process, meeting officers and receiving feedback on the progress of the scheme. In addition to this the Harris Federation held consultation meetings on the school in June 2013 which was held at Bromley Parish Church and advertised through the local press and schools and other groups were informed via the Bromley LA circular. The Harris Federation have also attended an SRA meeting in September 2013 to advise on the process and stage we were at. We also met with local councillors in October 2013 as well as subsequent meetings with the SRA in addition to the formal pre-planning application meetings with the local authority.

Following the requirements of the SCI the applicant has sent out leaflets to local residents informing them of the development proposal, and held a public exhibition at St Mary's Church, Kingswood Road to allow the proposal to be more fully understood by the local community prior to submission. In addition to this the project team also met with the SRA to outline the scheme proposals.

The SCI submitted with the planning application gives more detail on the consultation undertaken, and clearly demonstrates that the approach and process undertaken is in full compliance with the London Borough of Bromley adopted SCI.

Conclusions

This scheme for a new primary school is entirely consistent with national, regional and local planning policies, and many of the comments made by objectors to the scheme are unsubstantiated and not related to planning policies and considerations. The scheme is fully justified in meeting an identified education need, with a design that responds well to the site and surrounding context, and should be fully supported in line with UDP and London Plan policies."

Comments from Consultees

Highways comments are as follows: Updated information has provided a revised trip generation methodology using school travel plan data provided by the Council;

- an increase in on-site parking for staff from the proposed level of 13 spaces; and an on-street parking and drop-of/ pick-up strategy to avoid displacement of commuter parking.
- It can be assumed that some pupils and staff attend breakfast clubs, and extra-curricular activities and after school care in the afternoon, no firm details are given at this stage.

MULTIMODAL TRIP ASSESSMENT- Replacing the initial TRAVL/ TRICS based assessment approach, the Council provided historical Travel Plan data for four Bromley-based primary school sites to derive an appropriate multimodal mode split for the Application Site.

Modal Split Data Travel survey data for staff and pupils of the following schools has been presented to the Applicant by the Council;

- Clare House Primary School; Oakwood Avenue, Beckenham, (PTAL 2);
- Highfield Junior School, South Hill Road, Shortlands, (PTAL 1b);
- Pickhurst Infant and Junior Academy, Pickhurst Lane, (PTAL 1b); and
- Valley Primary Academy, Beckenham Lane, Bromley, (PTAL 3)

Time Period	Staff Trips (49 Staff)			Pupil Trips (420)		
	Arrivals	Departure	Total	Arrivals	Departure	Total
07:00-08:00	18.5	0.0	18.5	0.0	1.3	1.3
08:00-09:00	30.5	0.0	30.5	492.8	105.0	597.8
09:00-10:00	0.0	0.0	0.0	128.5	110.0	238.6
10:00-11:00	0.0	0.0	0.0	25.2	7.6	32.8
11:00-12:00	0.0	0.0	0.0	28.6	20.2	48.7
12:00-13:00	0.0	0.0	0.0	18.1	39.5	57.5
13:00-14:00	0.0	0.0	0.0	24.8	21.0	45.8
14:00-15:00	0.0	0.0	0.0	51.7	20.6	72.2
15:00-16:00	0.0	0.0	0.0	190.7	625.0	815.6
16:00-17:00	0.0	21.3	21.3	18.1	36.3	54.3
17:00-18:00	0.0	13.0	13.0	4.6	0.0	4.6
18:00-19:00	0.0	14.7	14.7	0.0	0.0	0.0
Daily	49.0	49.0	98.0	982.9	986.3	1969.2

Table above illustrates Primary School All People Trips by Staff and Pupils

Time Period	Staff Trips (49 Staff)			Pupil Trips (420)		
	Arrivals	Departure	Total	Arrivals	Departure	Total
07:00-08:00	12.9	0.0	12.9	0.0	0.3	0.3
08:00-09:00	21.2	0.0	21.2	124.6	26.5	151.1
09:00-10:00	0.0	0.0	0.0	32.5	27.8	60.3
10:00-11:00	0.0	0.0	0.0	6.4	1.9	8.3
11:00-12:00	0.0	0.0	0.0	7.2	5.1	12.3
12:00-13:00	0.0	0.0	0.0	4.6	10.0	14.5
13:00-14:00	0.0	0.0	0.0	6.3	5.3	11.6
14:00-15:00	0.0	0.0	0.0	13.1	5.2	18.3
15:00-16:00	0.0	0.0	0.0	48.2	158.0	206.2
16:00-17:00	0.0	14.8	14.8	4.6	9.2	13.7
17:00-18:00	0.0	9.1	9.1	1.2	0.0	1.2
18:00-19:00	0.0	10.2	10.2	0.0	0.0	0.0
Daily	34.1	34.1	68.2	248.5	249.4	497.9

Table above identifies that the proposed primary school has two clear peaks, with one in the morning between 08:00 and 09:00 with 146 vehicular arrivals and 27 departures, and the second between 15:00 and 16:00 with 48 vehicular arrivals and 158 departures. The school operation is predicted to have no significant impact on the afternoon network peak hour between 17:00 and 18:00 with nine vehicular departures.

JUNCTION CAPACITY ANALYSIS- Analysis of the junction was undertaken for the Valley Road/ Mays Hill Road/ Hillside Road/ Kingswood Road junction, utilising

traffic flows from MCC survey data, TRICS data obtained within the trip generation analysis, and growth factors obtained from TEMPro.

The proposed school is expected to have an acceptable impact upon the existing junction, with maximum RFC values increasing from 0.253 (25.3%) under the Do-Nothing Scenario to 0.512 (51.2%) under the Do-Something Scenario.

The Valley Road/ Mays Hill Road/ Hillside Road/ Kingswood Road junction is therefore expected to operate within its design capacity.

Proposed On-Site Parking Provision and Accesses- The proposal continues to utilise the existing vehicular access points for the Application Site, one on Kingswood Road and one on Mays Hill Road, providing access to two separate car parks. The northern Kingswood Road access car park will provide two parking spaces for disabled staff and visitors.

The southern Mays Hill Road access car park has been increased to 20 staff car parking spaces (from 10 spaces), at the request of this office. It will be secured by a manual barrier which will be kept open during main school opening hours.

Applying the staff mode split provided by LBB, which suggests 67.7% of staff drive and 4.0% car share, this parking provision is acceptable to cater for all 20 vehicles used by the 28 teaching staff. Any administrative staff, part-time kitchen and ancillary staff, and visitors to the school are expected to have a less car dependent travel behaviour which would be catered for by nearby free white bays and unrestricted on-street parking.

Proposed Servicing and Delivery Arrangements- Provision for servicing and delivery remains unchanged from the original proposals, enabled by an inclusion of loading bay situated in close proximity to the kitchen and bin store.

Proposed Emergency Access- Provision for emergency vehicles remains unchanged from the original proposals.

Proposed Cycle and Scooter Parking- Scooter and bicycle parking provision remains unchanged from the original proposals, with 28 cycle parking spaces (14 stands) for staff and pupils, and 18 scooter parking spaces (two stands) for pupils, provided near the two pedestrian entrances.

Pupil Drop-Off/ Pick-Up- It is proposed that pupils travelling by car will be dropped-off/ picked-up from an on-street location in either Kingswood Road or Mays Hill Road, using either of the two entrances. It is expected that parents will not be permitted to use either of the car parks, which will be earmarked for visitors and staff.

Proposed On-Street Parking Provision- Existing Parking Stress

In order to investigate the existing level of parking stress, a survey was undertaken between the hours of 05:30 and 21:00 on Tuesday 10th June 2014. The parking survey included license plate data to allow for duration of stay which can be used as a proxy for the identification of commuter traffic parking within the survey area.

The observed parking survey area has 1,290 metres of available kerb length for parking. The following areas not legal for parking have been deducted from the available kerb length:

- Junction areas (Iden Close);
- Bus stop areas (Kingswood Road, two bus stops);
- White Lines (3 spaces);
- Drop Kerbs (52 spaces);
- Single Yellow Lines (34 spaces); and
- Double Yellow Lines (5 spaces).

In line with Lambeth Methodology an average of 5m parking space was assumed.

During the key school run periods the survey shows an occupancy of between 58% and 74% from 08:00 to 09:00, and 75% from 15:00 to 16:00. The impact of commuter parking during these periods is particularly high, with 56 to 75 vehicles between 08:00 and 09:00, and 84 to 92 vehicles between 15:00 and 16:00 associated with commuter parking.

Overall, the maximum number of parked vehicles with 124 occurred between 11:30 and 12:30 which equates to a parking stress of 82%. It should be noted that this peak does not coincide with the demand associated to the school at the start and end of the school day. The lowest parking occupancy was observed at the start of the survey at 5:30 with 32 vehicles (21% parking stress), with the average number of parked vehicles across the survey period at 88 (42% parking stress).

Estimated Demand Profile- The following assumptions have been used for assessing the impact of the school development:

- In the morning, 20%* of all pupils partake in a breakfast club, arriving one hour early, i.e. between 07:30 and 08:00; during this period each kerbside space would be used twice only;
- The remainder of 80%* of pupils arrive over a 20 minute window between 08:30 and 08:50. For the purpose of the resulting parking demand, it has been assumed the maximum drop-off dwell time is 5 minutes, i.e. each kerbside space is available four times over a 20 minute period;
- A total of 80%* of staff arrive before the main school peak between 07:30 and 08:00. The remaining 20%* of staff arrive during the peak along with the pupils between 08:30 and 09:00;
- In the afternoon, 80%* of pupils get picked up immediately at school closing time at 15:20, with 20%* remaining in school for after-school clubs for one hour until the commuter peak period of 17:00 to 17:30;
- For those pupils picked up by private vehicle around 15:20 (80% of total), 40% of vehicles are expected to arrive after 15:00 and depart by or before 15:30, with each space only available once during this period; the remaining 40% of vehicles are expected to arrive by or after 15:30 and depart by 16:00 at the latest; as before, each space is only assigned once during this period;
- Staff depart after the main school peak, with 40%* of staff departing between 16:30 and 17:00 and 60%* between 17:00 and 17:30.

The above assumptions () are based on information provided by the Harris Federation on the current operation of the temporary site at Westmoreland House, where 12 out of 53 pupils (22%) participate both breakfast and after school clubs, and the majority of staff arrive early (80%) and stay late (60%), compared to the school opening and closing times.*

The two options have been consulted with this office and their impacts are as follows:

Option 1: Unrestricted Parking with Waiting/ Parking Restrictions

Option 1 (temporary measure) foresees to maintain unrestricted parking within the vicinity of the Application Site, and expand the existing single yellow line marking so that dropping-off and picking-up during the school peak hours can be facilitated.

This can be facilitated up to the end of year 2 after site opening (September 2017) with a reduced on-street parking capacity of 126 spaces, and an increased single yellow line for a maximum of 20 vehicles, to accommodate drop-off/ pick-up for 180 pupils. The proposals are illustrated in drawing 1401-68PL14C showing on street parking capacity which serves the demand from commuters, residents and staff.

It is intended to monitor on-street car parking capacity and travel behaviour of staff and parents as part of the travel planning process, and, should the need for further intervention be identified, a controlled parking zone (CPZ) is proposed, to be introduced at the discretion of the Council. The Harris Academy has stated that the “Federation commit the monies to fund the process into a bond, which would be secured by means of a S106 agreement. Commitment to funding a CPZ in the future (by means of a bond), should the Council wish to do so, supported by ongoing monitoring of parking capacity issue beyond 2017/18.”

Option 2: Controlled Parking Zone Extension

Should the monitoring process identify the need to address parking issues at the Application Site beyond 2017/18, it is proposed to extend the existing CPZ A and C to include Mays Hill Road and part of Kingswood Road, in order to facilitate residents parking, as well as accommodating the demand from the primary school development during school peak hours.

The CPZ is proposed to operate Monday to Saturday, between 12:00 and 14:00, in line with the time of the current CPZ A and C nearby. This is to deter commuter parking which is shown from the parking stress survey to occur during those times, while allowing parking for residents, visitors and school drop-off and pick-off outside these hours.

It should be noted that this measure is not designed to facilitate staff car parking, who would be prevented from obtaining business parking permits and therefore on-street parking by means of a S106 agreement. The proposed CPZ extension is illustrated in drawing 1401-68 PL17A in showing 77 on-street spaces.

To summarise:

On-site car parking spaces for 20 staff and a further 2 spaces for disabled staff or visitors displaying Blue Badges will be provided, which is considered acceptable to

accommodate teaching staff at the car driving (67.7%) and car sharing (4.0%) mode split.

Twenty eight cycle parking 18 scooter parking spaces will be created near the two main entrance points in sheltered, safe and secure locations.

Two options for the on-street parking strategy have been indicated to the Council for consideration, and agreed in principle by this office.

The proposals will increase the traffic in the area. It is proposed that 22 car parking spaces would be provided on site to help mitigate staff parking on the adjacent roads.

Residents have raised concerns as the roads during the morning dropping off and afternoon picking up can be heavily congested. Notwithstanding this, the surveys confirm that traffic generated by the school can be accommodated on the local road network.

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.

The Environment Agency advise the nearest river is the Ravensbourne, well to the north of the site. It's possible that there is a Thames Water sewer running through the site although I would've expected that to be shown on our map. The application should be referred to your drainage team and Thames Water on this.

The submitted drainage strategy indicate that the applicant is proposing an underground tank to attenuate for surface water run-off. Standard condition D02 is suggested.

Any comments from a Landscaping and Tree point of view will be reported verbally.

The Environmental Health officer advises that the contamination report identifies some contamination from PAH species, Arsenic and Lead and some remedial measures are necessary which we need to approve. A K09 condition should be attached to cover this.

Noise

The noise assessment indicates that specific noise insulation and ventilation requirements would be needed to meet the requirements of BB93 and provide a good internal environment. The documents mention staggered playtimes, in which case the effect of noise from playing on classrooms adjacent to the play areas should additionally be considered when specifying insulation to those facades. In theory some of these requirements should come under Approved Document E of Building Regs so this may be a duplicate control for some of the issues but if it is felt that further control is desirable then the following condition could be attached:

Details of a scheme of noise insulation and mitigations for the school buildings (including mechanical ventilation where necessary) to meet the requirements of Building Bulletin 93 shall be submitted to the Local Planning Authority for approval. Once approved the scheme shall be implemented in full prior to the use commencing and permanently maintained thereafter.

The report states 'It is noted that on the drawings, a moveable wall is included between the Hall and the Studio. It is expected that the airborne sound insulation requirements are unlikely to be achieved and so derogation from the criteria in BB93 may be required'. The proposed situation is likely to lead to a poor quality noise environment or the spaces being unusable simultaneously.

The acoustic assessment does not consider the effect of noise from children on surrounding amenity. Noise from children playing can be a source of complaints and the play areas are in close proximity to housing. If you are minded to approve the application it is likely that residents would have to accept some loss of amenity as a result of noise during outdoor play times. Also, the external areas are exposed to more noise than is currently recommended by BB93 but no further investigation and options for reducing the noise level have yet been considered (as stated in BB93). It is likely that further mitigations such as acoustic fencing and possibly sound absorption may be reasonable.

If you are minded to grant permission I would recommend that the following condition is attached to cover treatments to the outdoor play areas:

A scheme of noise mitigation (to reduce as far as reasonably practical ambient noise levels within the play areas and noise escape from the play areas) shall be submitted to the Local Planning Authority for approval. Once approved the scheme shall be implemented in full prior to the use commencing and permanently maintained thereafter.

In respect of plant noise the following condition should be attached:

At any time the combined noise level from all plant at this site in terms of dB(A) shall be 10 decibels below the relevant minimum background noise level, LA90(15mins) measured at any noise-sensitive building. If the plant has a distinctive tonal or intermittent nature the predicted noise level of the plant shall be increased by a further 5dBA. Thus if the predicted noise level is 40dB(A) from the plant alone and the plant has a tonal nature, the 40dB(A) shall be increased to 45dB(A) for comparison with the background level. The L90 spectra can be used to help determine whether the plant will be perceived as tonal.

Air Quality

The sites lies within an Air Quality Management Area for NOx and may lead to significant traffic generation but no Air Quality Assessment has been submitted.

Bromley Education, Care and Health Services have written in support of the application. They state that Harris Primary Academy Shortlands is a new free school opening in September 2014 in off- temporary accommodation. The Council

has agreed to dispose of the Kingswood House site to enable permanent accommodation to be constructed for the school. The new school will be 2 Forms of Entry and when full accommodate approximately 420 pupils.

The new school has been included as part of the Councils strategy for providing sufficient high quality school places in the borough. Currently, in Shortlands there are streets that cannot access a local school due to increased demand and this development will help the needs of local parents. Without opening the school in September 2014 there would have been a shortage of school places across Education planning area 1 to 4.

Comments from Executive Director Education, Care and Health Services:

“We welcome comments from the Shortlands Residents’ Association (SRA) on the Council’s proposals to deliver its statutory duty to ensure a sufficiency of high quality school places for its residents. However, I find nothing in this submission that leads me to believe the consent applied for should not be awarded.

Site

It is Government policy that novel sites should be explored for free schools. Changes to planning regulations introduced in 2013 mean that in England free schools can open in offices, hotels and shops. As such, the planning guidance referred to in the SRA submission on p6 does not relate to free schools. Further, the standards quoted on p3 of the submission have no place in Statute and therefore no place in the formal planning process.

The plans prepared for the site provide an interesting and creative use of a brown field site, consistent with planning requirements contained within the existing and indeed draft Local Area Plan for the London Borough of Bromley. p8 et seq of the submission again makes reference to outdated guidance.

The site is at the heart of the area of greatest need in the borough which spans pupil place planning areas 1 to 4: this has been established by the Members Working Party considering school places. The argument both for the need and the location seems irrefutable. P4 of the submission refers to ‘we are informed..’: the documentation approved by the Members’ Working Party is on our website and therefore freely available. These make the case for further places in this location (p5 of the submission). According to the most recent GLA projections without Harris Primary Academy Shortlands opening in September 2014 there would have been a deficit of 44 places across planning areas 3 & 4 that encompasses Shortlands.

Furthermore the need for school has been proven by the actual demand for school places in Shortlands for September 2014. If places at Harris Primary Academy Shortlands had not have been available there would have been 55 children in the Shortlands area without an offer of a school place. Out of 55 places accepted at the school by the end of summer term 2014, over 75% of children lived less than a mile from Kingswood House.

The Learning Environment is a matter for the head teacher and trustees of the school. It is for them to organise the learning in an appropriate manner and that these arrangements will be monitored and overseen by Ofsted. The providers, Harris, have an excellent reputation for delivering high quality education in a wide variety of contexts and the Council is confident that they will be able to repeat this on this site. The report author knows little about schools day and school planning, and p12 makes reference in emotive language to 'pupils being cooped-up'. This will certainly not be the case. Staggered breaks have been common in many schools for many years. We must be careful that we do not apply an outdated model of how education is delivered to a new school and a provider with an outstanding record of high quality provision.

The school is sustainable and the evidence provided by the providers indicate that to be the case. The development meets the energy and sustainability requirements and policies of the London Borough of Bromley, the London Plan 2010 and current Building Regulations. The proposed sustainability principles and engineering concepts also incorporate the requirements and guidelines of the relevant British Standards, CIBSE guides and DfE Building Bulletins. The SRA may disagree with this and again make use of outdated guidance (eg p15). The SRA submission itself states that the school will comply, for example, with CO2 emissions. 'Just comply' is to comply. We do not ask any applicant to significantly exceed the planning requirements.

The detailed transport assessment produced in association with the scheme concludes that proposed development, supported by the Travel Plan Framework, is sustainable and has a negligible impact on the local highway network. There will be issues at the beginning and end of the school day. The provider has discussed the possible solutions to mitigate these concerns with the Council and a number put forward, including increasing on-site parking.

Consultation

We are aware of a number of consultation events held by Harris and are content that they would normally be sufficient for such a scheme. The EFA hold numbers for those attending such events and we have been assured that they have had very good coverage. “

In terms of overall size Education advise:

The recommended site minimum size for a 2FE Primary school under BB103 is 16,632m². However, this is not statutory and consideration is also given to the introduction on pg 2 of BB103 that states:

“The purpose of this document is to set out simple, non-statutory area guidelines for mainstream school buildings (part A) and sites (part B) for all age ranges from 3 to 19. It supersedes the area guidelines in Building Bulletins (BB) 98 and 99, recommending reduced minimum internal and external areas.

The document aims to assist architects, sponsors and those involved in creating a design brief for new school buildings, or for school refurbishment or conversion projects. It may also be of interest to head teachers, governors and others who need advice on the appropriate amount of space for teaching and learning activities.

However, in line with policies which seek to increase choice and opportunity in state funded education, these guidelines will not necessarily have to be met in every case and should always be applied flexibly in light of the particular circumstances.”

Furthermore in Annex B on page 44 that specifically deals with site size the following caveat is provided:

“Where there is limited outdoor space available to pupils on a restricted site, consideration should be given to providing the following:

- 1. firstly, hard informal and social area, including outdoor play area immediately accessible from early years classrooms;*
- 2. then hard outdoor PE space, ideally in the form of a multi-use games area;*
- 3. then soft informal and social area;*
- 4. finally soft outdoor PE area.”*

Planning Considerations

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

- BE1 Design of New Development
- NE7 Development and Trees
- C1 Community Facilities
- C7 Educational and Pre School Facilities
- T1 Transport Demand
- T3 Parking
- T18 Road Safety

London Plan policies:

- 3.18 Education facilities
- 5.1 Climate change mitigation
- 5.2 Minimising carbon dioxide emissions
- 5.3 Sustainable Design and Construction.
- 5.7 Renewable Energy
- 5.13 Sustainable Drainage
- 6.9 Cycling
- 6.10 Walking
- 6.11 Smoothing traffic flow and tackling congestion
- 6.12 Road network capacity
- 6.13 Parking.
- 7.2 An Inclusive Environment.

- 7.3 Designing out Crime
- 7.4 Local Character
- 7.6 Architecture
- 7.21 Trees and woodlands
- 8.3 Community infrastructure levy

The above policies are considered to be consistent with the principles and objectives of the National Planning Policy Framework which is a key consideration in the determination of this application.

The Councils adopted SPG design guidance is also a consideration.

Planning History

There is no recent planning history.

Conclusions

The main planning considerations relevant to this application are:

- Whether the principle of the a new school on the site is acceptable.
- The design and appearance of the proposed scheme and the impact of the new school buildings and site alterations on the character and appearance the locality
- The impact of the scheme on the residential amenity of neighbouring properties.
- Traffic, parking and servicing.
- Sustainability and Energy.
- Ecology and Landscaping.

Principle of Development

Policy C1 is concerned with community facilities and states that a proposal for development that meets an identified education needs of particular communities or areas of the Borough will normally be permitted provided the site is in an accessible location.

Policy C7 is concerned with educational and pre school facilities and states that applications for new or extensions to existing establishments will be permitted provided they are located so as to maximise access by means of transport other than the car.

The London Plan policy 3.18 states that "proposals for new schools should be given positive consideration and should only be refused where there are demonstrable negative local impacts which substantiality outweigh the desirability of establishing a new school and which cannot be addressed through appropriate use of planning conditions or obligations."

Design

Paragraph 63 of the NPPF states that 'in determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area'. Paragraph 131 states that 'in determining applications, local planning authorities should take account of the desirability of new development making a positive contribution to local character and distinctiveness.

Policy BE1 requires that new development is of a high standard of design and layout which complements the surrounding area and respects the amenities of the occupants of nearby buildings.

In terms of design the proposed building design is contemporary and uses a modern palette of materials with a high quality approach. This approach is supported within this context with the proposed building .

The layout and access has echoes the original building and is smaller in height than the original.

The building is located to respect the existing street form and allow for a buffer space to be provided.

The scale of the school building is designed to broadly reflect the scale of buildings in the area. In particular, the height of the building reflects that of buildings in the vicinity. The separation from residential properties is considered acceptable. Members may consider that the scale of the development given the sense of place and destination it would create as a school building in a residential area is acceptable.

In terms of appearance and elevational treatment the applicant intends that all of the building will have a consistent design. In principle the materials palette as detailed above is considered acceptable subject to further details and samples which can be obtained by planning condition.

It may be considered that the layout, scale and mass, elevational treatment and composition of the frontages to public roads would be particularly successful. The proposed elevational treatment and use of materials can be secured by a condition on a planning permission.

The position of the building has been set back from the boundaries with minimum distance of 3 metres from the boundary to the building.

Residential Amenity and Impact on Adjoining Properties

Policy BE1 also requires that development should respect the amenity of occupiers of neighbouring buildings and those of future occupants and ensure their environments are not harmed by noise and disturbance or by inadequate daylight, sunlight or privacy or by overshadowing.

In terms of neighbouring residential amenity it is considered that there would be no significant impact on the privacy and amenity of adjoining occupiers in terms of loss of light and outlook, siting and position of the replacement school building.

The bulk and mass of the building is set away from the site boundary to at a lower level.

Given the separation distance and function of the rooms it is not considered that the residential amenity of occupiers will be affected significantly.

A number of mature street trees are located in the footway and given the below street level siting of the building and substantial separation distance across the road to these properties it is not anticipated that any loss of privacy or overlooking will occur in accordance with Policy BE1. It is acknowledged that the outlook from these properties will be altered. It is considered that the siting of the building at a lower level goes some way to mitigate this and account must be taken of the need for the building to provide school places.

Highways and Traffic Issues

The applicants have provided a Transport statement to accompany the application, this states in order to facilitate the existing parking pressures from residents and commuters, as well as creating capacity for car-borne drop off and pick-up traffic associated with the proposed development, mitigation measures are indicated.

Short term: unrestricted Parking with waiting Restrictions (Option 1)
Optional Long Term: Controlled Parking Zone (Option 2)

Option 1:

Option 1 foresees to maintain unrestricted parking within the vicinity of the application site and expand the existing single yellow marking so that dropping -off and picking-up during the school peak hours can be facilitated. This can be facilitated up to the end of year 2 after opening (September 2017) with a reduced on street parking capacity of 126 spaces and an increased single yellow line for a maximum of 20 vehicles to accommodate drop-off/pickup for 180 pupils.

It is proposed to monitor on- street car parking capacity and travel behaviour of staff and parents as part of the travel planning process and should further intervention be identified, a controlled parking zone (CPZ) is proposed, to be introduced at the direction of the Council. The Foundation will commit monies to fund the process which would be secured by legal agreement.

Option 2:

Option 2 - should the monitoring process identify the need to address parking issues beyond 2017/2018, it is proposed to extend the existing CPZ A and C to include Mays Hill Road and part of Kingwsod Road.

The full detail of this is outlined in the transport statement.

A Transport Statement has been submitted, the contents of which have been reviewed by the Council's Highway's Officer - see consultee comments above

It is noted that many representations have been received from local residents about parking congestion on street, parking provision on site and highway safety issues.

However, taking these issues into account, along with the Highways Officers findings it is considered that the proposal is acceptable subject to a Section 106 Legal Agreement regarding traffic management options and possible extension of CPZ. A condition regarding a Travel Plan would also be necessary.

Sustainability and Energy

Policy 5.3 Sustainable Design and Construction of the London Plan states that the highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime.

The scheme is a major application and therefore is required by Policy 5.2 of the London Plan to achieve a 40% reduction in carbon emission on 2010 Building Regulations between 2013 and 2016.

The proposal includes the use of photovoltaic cells positioned on the roof which will contribute to renewable energy.

Play area, Ecology, Landscaping

A phase 1 habitat survey has been carried out on the site. The survey concluded that in general the site was of low ecological value. The site was able to support breeding and foraging bats and birds. No protected species were found. The recommendation of the report was that works should be timed to avoid the bird nesting season and no objection is raised in this regard.

It is noted that the play area is limited and objections have been raised in this respect. The play area is located at a lower level than neighbouring properties and below a retaining wall. The impact of this area is lessened due to these factors.

In terms of overall play area the comments from education are noted.

General landscaping works are proposed.

An Extended Phase 1 Habitat Report has been submitted. The findings have been reviewed

Land contamination and Site Investigation

A Site Investigation report has been submitted to the Council as part of the application. Any comments from the Environmental Health Officer will reported.

Summary

The application site was visited by the case officer and the aims and objectives of the above policies, national and regional planning guidance, all other material planning considerations including any objections, other representations and relevant planning history on the site were taken into account in the assessment of the proposal.

Should Members consider the development acceptable, having taken into account all factors including the Transport Assessment submitted as part of this application, a legal agreement should be undertaken to enable the London Bromley of Bromley to undertake waiting and parking traffic measures adjacent to the site and consult, and if agreed undertake an extension to the CPZ if required. A robust Travel Plan would also be required which would be subject of a condition.

Taking into account the submitted Transport Assessment and subject to conditions and a legal agreement, the highways impacts of the proposal may be considered acceptable, particularly in light of the other benefits of the scheme including the clearly urgent requirement for school places.

The proposed school building and external works are considered to be of appropriate scale, mass and design and relate well to their context in the locality. It is not considered that the proposal would have an unacceptable impact on visual amenity in the locality or the amenity of neighbouring occupiers.

On balance, it is considered that the proposal represents a sustainable form of development in accordance with the aims and objectives of adopted development plan policies.

Background papers referred to during production of this report comprise all correspondence on the file ref(s) excluding exempt information.

RECOMMENDATION: PERMISSION SUBJECT TO THE PRIOR COMPLETION OF A LEGAL AGREEMENT

and the following conditions:

- | | | |
|---|-----------------|--|
| 1 | ACA01
ACA01R | Commencement of development within 3 yrs
A01 Reason 3 years |
| 2 | ACA04
ACA04R | Landscaping Scheme - full app no details
Reason A04 |
| 3 | ACA07
ACA07R | Boundary enclosure - no detail submitted
Reason A07 |
| 4 | ACB01
ACB01R | Trees to be retained during building op.
Reason B01 |
| 5 | ACB03
ACB03R | Trees - no bonfires
Reason B03 |
| 6 | ACB16
ACB16R | Trees - no excavation
Reason B16 |
| 7 | ACC01 | Satisfactory materials (ext'nl surfaces) |

- 8 ACC01R Reason C01
ACD02 Surface water drainage - no det. submitt
AED02R Reason D02
- 9 ACH03 Satisfactory parking - full application
ACH03R Reason H03
- 10 ACH16 Hardstanding for wash-down facilities
ACH16R Reason H16
- 11 ACH18 Refuse storage - no details submitted
ACH18R Reason H18
- 12 ACH28 Car park management
ACH28R Reason H28
- 13 ACH29 Construction Management Plan
ACH29R Reason H29
- 14 ACH30 Travel Plan
ACH30R Reason H30
- 15 ACI21 Secured By Design
ACI21R I21 reason
- 16 ACJ22 Lighting Scheme
ACJ22R J22 reason
- 17 ACK01 Compliance with submitted plan
ACK03R K03 reason
- 18 No plant, equipment or machinery shall be placed erected or installed on or above the roof or on external walls without the prior approval in writing by the Local Planning Authority.
ACK03R K03 reason
- 19 ACK05 Slab levels - no details submitted
ACK05R K05 reason
- 20 The targets for carbon dioxide emissions reduction detailed within the Sustainability and Energy Strategy Report hereby approved shall be achieved on site prior to occupation of the new school building.
- Reason:** In order to achieve compliance with the Mayor of London's Energy Strategy and to comply with Policy 5.2 of The London Plan.
- 21 Details of a scheme of noise insulation and mitigations for the school buildings (including mechanical ventilation where necessary) to meet the requirements of Building Bulletin 93 shall be submitted to the Local Planning Authority for approval. Once approved the scheme shall be implemented in full prior to the use commencing and permanently maintained thereafter.
- 22 A scheme of noise mitigation (to reduce as far as reasonably practical ambient noise levels within the play areas and noise escape from the play areas) shall be submitted to the Local Planning Authority for approval. Once approved the scheme shall be implemented in full prior to the use commencing and permanently maintained thereafter.
- 23 At any time the combined noise level from all plant at this site in terms of dB(A) shall be 10 decibels below the relevant minimum background noise level, LA90(15mins) measured at any noise-sensitive building. If the plant has a distinctive tonal or intermittent nature the predicted noise level of the plant shall be increased by a further 5dBA. Thus if the predicted noise level is 40dB(A) from the plant alone and the plant has a tonal nature, the 40dB(A) shall be increased to 45dB(A) for comparison with the background

level. The L90 spectra can be used to help determine whether the plant will be perceived as tonal.

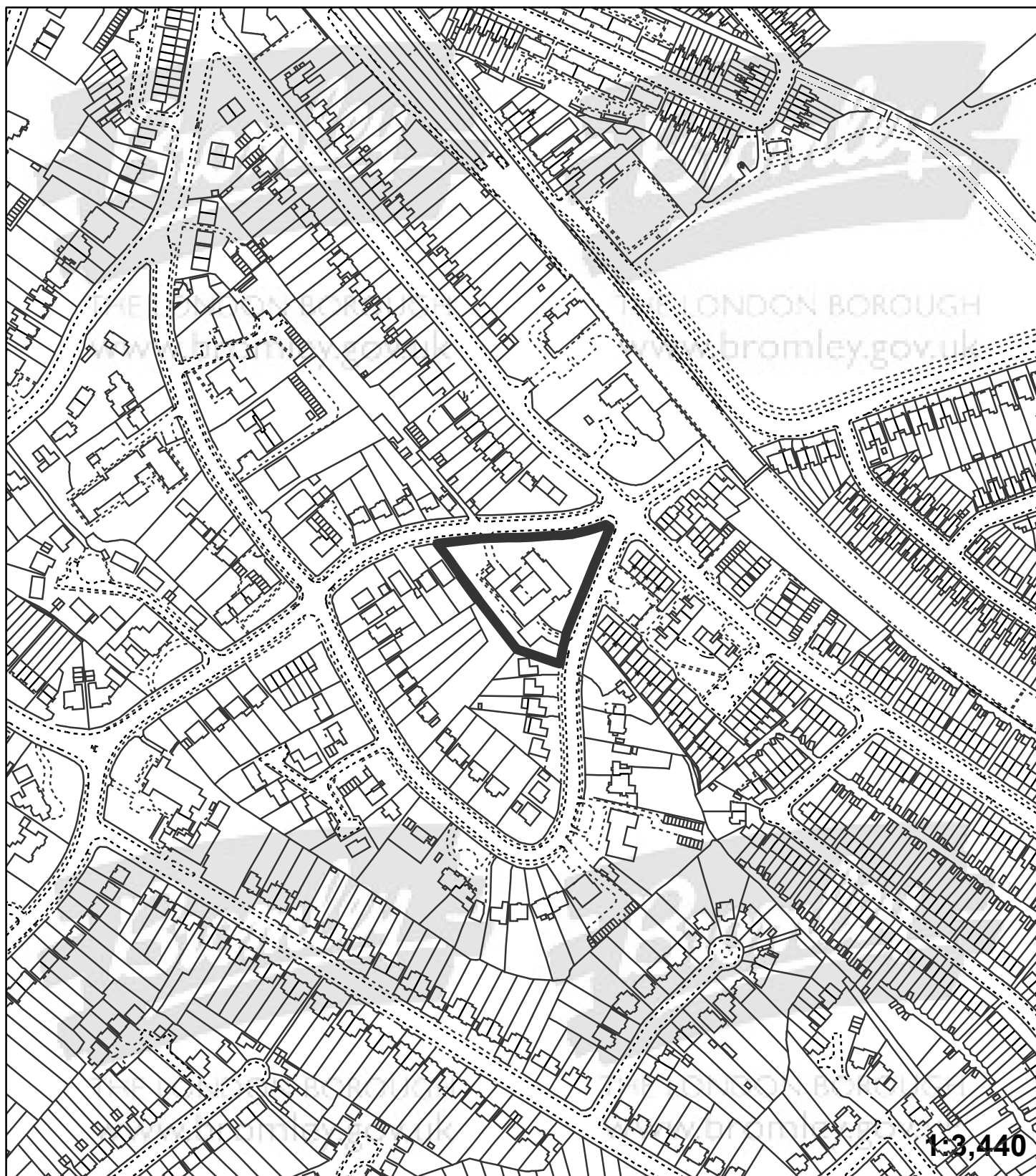
INFORMATIVE(S)

- 1 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.
- 2 Any repositioning, alteration and/ or adjustment to street furniture or Statutory Undertaker's apparatus, considered necessary and practical to help with the forming of vehicular crossover hereby permitted, shall be undertaken at the cost of the applicant.
- 3 Federation commit to fund the process secured by means of a S106 agreement. Commitment to funding a CPZ in the future (by means of a bond), should the Council wish to do so, supported by ongoing monitoring of parking capacity issue beyond 2017/18." 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.

Application:14/02667/FULL1

Address: Kingswood House Mays Hill Road Shortlands Bromley BR2 0HX

Proposal: A two form entry primary school, involving the demolition of all existing buildings together with the erection of a two storey building with associated vehicular access, parking and landscaping



"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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