## **Supporting Communities**

## **Education Sites**

#### Context

Local authorities have a statutory duty under the Education Act 1944 to secure sufficient school places within their areas. Planning permission must nevertheless be obtained where necessary.

## National Planning Policy

The National Planning Policy Framework (NPPF) (2012) requires Local Planning Authorities to assess the quality and capacity of infrastructure (including education) and its ability to meet forecast demands; and to plan positively for the infrastructure required in the area.

The Government specifically "attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities" (NPPF). It states that Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education by giving great weight to the need to create, expand or alter schools; and by working with schools promoters to identify and resolve key planning issues before applications are submitted.

### London Plan

The London Plan highlights local authorities' strategic role in the new system will be to take a proactive, positive and collaborative approach to development that will widen choice in education, encouraging the development of Academies and Free Schools. (Policy 3.18 "Education Facilities") It advises that land already in educational use should be safeguarded and new sites secured to meet additional demands or changes in provision. The London Plan Policy requires the plan to "secure sites for future provision recognising local needs and the particular requirements of the education sector." Policy 3.16 "The Protection and Enhancement of Social Infrastructure" advises that the suitability of redundant social infrastructure premises for other forms of social infrastructure for which there is a defined need in the locality should be assessed before alternative developments are considered.

The Mayor's approach reflects the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on "Planning for Schools Development" (Aug 2011) which reiterates that there should be a presumption in favour of the development of state-funded schools, as expressed in the National Planning Policy Framework.

### Bromley Local Plan

Adopted Unitary Development Plan (UDP) Education Policy C7 supports applications for new or extensions to existing educational establishments provided

they are located so as to maximise access by means of transport other than the car. Similarly Policy C1 supports proposals that meet identified educational needs and resists the loss of community facilities.

In response to the increasing demand for school places the emerging Local Plan Policy, set out in the "Draft Policies and Designations" document (2014) seeks to address the need, in line with the requirements of the NPPF, by assessing the need, safeguarding education land, enabling necessary expansions and allocating sites. The emerging draft Local Policies are set out in Appendix 4

### Assessing Need for Provision

The Borough's projected education need is set out in the Council's "Review of the Primary School Development Plan" and "Planning of Secondary School Places" (2015), detailed below and summarised in Table 1. These plans which included recommendations to meet that need were agreed by the Council's Education Portfolio Holder (29<sup>th</sup> January 2015). Both documents form part of the Local Plan's Evidence Base.

Table 1. Education Proposals to Address Need in Forms of Entry (FE)

	Extensions to	New Schools	Total
	Existing		Need
Primary	20FE	10FE (5 schools)	30FE
Secondary	4 – 9 FE	24 - 31FE (4-5	35FE
		schools)	

Extracted from "Review of the Primary School Development Plan" (Jan 2015) "Planning of Secondary School Places" (Jan 2015)

The Council's "Review of the Primary School Development Plan" indicates that the primary requirement within the various education planning areas can be addressed through the provision of :

- over 20 additional forms of entry (FE) through increased places at existing schools;
- up to 10 additional FE from 5 new Free Schools which been granted approval to open by the Secretary of State for Education, including Harris Shortlands and La Fontaine, which are currently operating from temporary sites, and Harris Beckenham, Crystal Palace Free School and Langley Park Free School. Additionally there is a requirement for the expansion of Chislehurst St Nicholas which would necessitate a new site

It is noteworthy that the GLA high population projection underestimated the number of reception places needed for September 2014 by over 200, resulting in the addition of 8 bulge classes.

In respect of secondary school places, the Council's "Planning of Secondary School Places" (2015) advises that from 2016/17 onwards an additional 20 forms of entry (FE) are required, increasing to 28 FE by 2019 and to 34.5 FE by 2021. The Review suggests that expansions at existing secondary schools and the provision of 4 new secondary schools would substantially, but not wholly, address the need, and consideration of further extensions to existing schools or a 5<sup>th</sup> new school will be required.

Thus far two secondary Free Schools, The Beckenham Academy and Bullers Wood School for Boys, as well as a University Technical College (UTC) providing 5FE for 14 – 18 yr. olds, have received approval to open from the Secretary of State for Education, although no sites currently have planning permission.

There will additionally be requirements over the plan period for other forms of specialist educational facilities, including "Alternative Provision".

The Local Plan development process has run in parallel with the increasing pressure for school places. Appendix 2 illustrates how the Council's emerging Local Plan has developed alongside the evolving education need, as articulated through the primary and secondary education development plans. These plans, approved by the Education Portfolio Holder indicate proposed expansions to existing schools and proposals for new Free Schools.

### Emerging Local Plan Approach to meeting need

The Draft Policies and Designations Document (Feb 2014) sets out the Council's emerging Local Plan draft education policies 6.5 and 6.6 which reflect the NPPF and the London Plan and state that the Council will ensure provision of an appropriate range of educational facilities by assessing the need over the plan period and allocating sites accordingly.

In addition to the planning constraints affecting any given site, a range of other factors and constraints need to be considered when assessing the potential of existing educational/school infrastructure to meet need through expansion, notably the catchment area of those schools in relation to demand. The catchment areas of primary schools are generally tightly drawn. For place planning purposes they are organised into nine Education Planning Areas.

The deliverability of any expansion proposal is also affected by educational and operational factors, notably the size of the existing intake, specific admission criteria, (e.g. faith) and the new legislative education landscape post the Academies Act 2010. Academies are state funded schools, independent of local authority control, and therefore expansion proposals to address need require strong partnership working. Academies comprise 16 of Bromley's 17 Secondary Schools, with the last maintained secondary school currently exploring conversion to academy status. 88%, that is 65 of the 74 Bromley primary schools are academies either converting to, or exploring conversion to academy status.

The provision of new schools is through the Free School process, whereby founding groups, including parents, education charities and religious groups submit applications to the Department for Education on the basis of parental demand to meet local need. As such the desired location of new schools can be difficult to anticipate. However the projections set out earlier in the paper indicate that the primary need is substantially to the north, northwest and centre of the Borough (Education Planning Areas 1-4) and this demand is generally reflected in the locations of Free School proposals coming forward. Secondary need is less localised and in theory is more "footloose", however, the circumstances surrounding some of the specific Free School applications to the Secretary of State for Education may have a particular locational site search focus.

The emerging Local Plan policies, reflecting national and regional policy, advise that the Council will look first at opportunities to maximise the use of existing Education Land or redundant social infrastructure in line with other existing community facilities / social infrastructure policies. In order to deliver sustainable site options, and acknowledging the changes to education delivery noted above, the approach to the expansion of existing provision and to new site allocations follows a site assessment and sequential approach. Such an approach ensures consistency, accessibility and transparency, as required by the National Planning Policy Guidance. It considers the range of planning designations and sets out a robust approach to assess the relative merits of sites for additional education provision.

## **Existing Education Sites**

To date much of the development seeking to address the need for additional education provision, already experienced in the primary sector, has been through planning applications on sites which are amongst the less constrained by strategic policy designations.

The strategic planning of primary school places is identified through the Primary Schools' Development Plan (PSDP), the most recet update in 2015. The overall strategy in the PSDP is to meet forecast growth through a combination of existing surplus capacity, permanent expansion of existing provision, new schools and bulge classes. Major expansion is considered where sustainable and feasible.

Larger school sites in Bromley tend to be covered by open space designations, thus the undesignated sites are by their very nature generally smaller, making extending these schools particularly challenging. However, of the 17 Primary Schools without open space designations, permanent additional places are being provided or explored at 6, with others providing bulge classes.

Table 8 in Appendix 3 set out the proposals detailed in the Primary School Development Plan (2015), which offer the potential for expansion by 15 primary forms of entry (FE). It should be noted that a number require planning permission.

The potential of existing infrastructure to address the projected Secondary need was considered in "Planning for Growth – Review of Secondary Education" (Jan 2014). Appended to that report was an assessment by school of the scope for expansion, understaken in partnership with the schools and taking account of the constraints of the individual sites.

All Bromley Secondary schools, save for Harris Academy Bromley, have some form of open space protection. Harris Academy Bromley however has other significant planning constraints (Conservation Area, locally listed building, and flood zone 3 a).

It is against this backdrop of significant constraints on existing sites that the outcome of the "Planning for Growth – Review of Secondary Education" and the subsequent update ("Planning of Secondary School Places" (2015) suggested secondary provision expansions on the seven school sites identified in Table 10 in Appendix 3. Subject to planning permission, expansions at these schools could provide an additional 9 FE

As options to expand the existing infrastructure to meet the local need reach exhaustion, the draft Local Plan proposes to employ a range of approaches to address the education needs over the plan period, specifically through:

- The assessment of the capacity of existing sites (including, redundant social infrastructure and other policy compliant sites in addition to the existing education land discussed above)
- Policy alteration to increase the flexibility of Urban Open Space (UOS) in respect of the expansion of existing educational premises,
- Appropriate -designation of existing school sites from Green Belt and Metropolitan Open Land to UOS, and
- Specific site allocations (with re-designations where required)

## Site Assessment methodology

In addition to considering existing education and social infrastructure sites the Local Plan Draft Policies and Designations consultation document (Feb 2014) also included a "Call for Sites" for a range of uses. Assessments, consistent with the criteria based approach to social infrastructure and specifically education, set out in London Plan policies 3.16 and 3.18, have been undertaken of all of the sites put forward as well as of other social infrastructure sites which offer potential, sites identified by proposed Free Schools in their submissions to the Secretary of State for Education and other sites known to be available.

Initially sites were grouped 1-4. As Table 2 below sets out the groupings relate to existing strategic policy constraints, past permissions and assessments and potential constraints, subject to the emerging Local Plan.

Table 2 Site Assessment Groups

Group	Compliance with existing or emerging local plan policy			
Group 1	Sites which comply with adopted local, regional and national planning policy.  undesignated sites, redundant community infrastructure, Site where development could be compliant with the existing UDP UOS policy or, in respect of MOL and Green Belt, compliant with the NPPF.			
Group 2	Sites with open space designations affected by <ul> <li>alterations through the Emerging Local Plan (i.e. amended UOS policy)</li> <li>UDP Inspectors assessment / planning permissions</li> </ul>			
Group 3	Existing schools sites (or adjacent land) assessed for redesignation from Green Belt or MOL to UOS,			
Group 4	Non-compliant sites, which would conflict with either existing or emerging Local Plan policy, national or regional policy.			

Sites within each of the four Groups were then assessed and ranked A - D according to the potential they offered as indicated in Table 3.

#### Table 3 Site Assessment Ranks

Rank	Assessment outcomes
A	These sites present realistic opportunities for school development NB those in Group 1 could be policy compliant under the current UDP. However, those in Groups 2 & 3 are dependent upon policy changes and designations in the emerging Local Plan being successfully taken through to adoption.
В	Offer potential, however, these sites  may be required to provide for other strategic needs within the Local Plan or;  involve the allocation of UOS sites which are in private ownership or have been inaccessible to the public for many years or;  would require the re-designation from Green Belt or MOL following the demonstration of "exceptional circumstances"
С	These sites are problematic because of a range of strategic policy, site specific and matters related to deliverability, but in the absence of appropriate A & B sites may need to be considered
D	These sites not considered realistic opportunities, This relates to a range of site specific reasons which cannot be mitigated notably size, the willingness of the owner as well as significant site constraints such as flood risk and /or strategic policy limitations associated with the protection of employment land and open spaces, notably the need to maintain the integrity of Green Belt / MOL policy and the robustness of their boundaries.

The outcomes of the site assessments are summarised below. The detailed assessments and further detail regarding the site assessment methodology form part of the Evidence Base.

#### **Site Assessment Results and Recommendations**

#### Group 1 Sites

A number of Group 1 sites currently offer potential for significant policy compliant developments and such sites need to be fully explored in the light of the local specific demand for places and public transport accessibility, site specific planning constraints, including flood risk and highways impacts, heritage and biodiversity before sites in less favourable groups can be considered.

The assessment of Group 1 sites revealed ten ranked A potential sites, of which two or three would enable significant expansion of the existing provision rather than potential new schools. Importantly these include sites which offer potential by virtue of the permitted infill or partial or total redevelopment of brownfield sites within the Green Belt or MOL.

Whilst Group 1 sites potentially make a significant contribution to meeting the need there may be limitations to deliverability on some sites related to timescales, ownership, current use and the contribution they might make to other Local Plan priorities. All other sites within Group 1 were not considered realistic opportunities (ranked D)

A couple of Group 1 sites, where the scale of policy compliant development is constrained by existing UOS policy, were also re assessed part of Group 2 as they could subject to the emerging UOS policy offer increased education development potential.

#### Group 2 Sites

Group 2 also revealed an additional two sites ranked A, and a further two sites ranked B, one of which is designated Green Belt and could not deliver sufficient development under the NPPF exceptions clauses. An allocation for education use would therefore be inconsistent with Green Belt or MOL policy designations, since the allocation of such sites requires, under the NPPF, the demonstration of "exceptional circumstances". Such circumstances would involve the demonstration of projected need, as outlined above; that other existing policy compliant sites outside these designations have been exhausted and that any other potential undesignated sites have been discounted on grounds sufficiently robust as to seek to justify release of alternative protected sites, for example on the grounds that

- Other more appropriate sites are required to meet alternative strategic needs of the plan which cannot be met elsewhere,
- There are flood risk issues or other site specific constraints that cannot be effectively mitigated
- The sites are not within the required location, where there is a demonstrable necessity for a particular catchment
- The sites are inadequate in terms of space NB schools can be provided on "restricted sites". (Education Funding Agency Building Bulletin 103 June 2014) with access to suitable off site provision of outdoor space. School Minimum Buildings and Site Areas are set out in Appendix 6 and by way of example the recently permitted Harris Shortlands, 2FE primary school will be developed on such a restricted site of 5,050m2

The NPPF advises that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. It goes on to advise that when defining boundaries they should ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development; satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

## Group 3 Sites

Group 3 sets out the potential for redesignating existing schools in Green Belt / MOL as Urban Open Space to facilitate their expansion or the construction ofnew schools. Approximately one third of Bromley school sites lie within the Green Belt or Metropolitan Open Land (MOL), where, under national and regional guidance, development for education is "inappropriate" by definition.

The outcome of the "Assessment of Open Space Designations on School Sites" is found in the evidence base and identifies 11 existing school sites for potential redesignation from Green Belt / MOL to Urban Open Space. Of these Group 3 sites, all but two are already the subject of proposals or feasibility studies into expansion / new Free School proposals. The sites offer potential to facilitate partnership working between the Council and Academies to enable education development over the plan period, thus, producing boundaries that should sustain beyond the plan

period, as sought by the NPPF. Re-designated sites would remain subject to all other policies of the plan including the Urban Open Space Policy and the additional designation as "Education Land", proposed in the "Draft Policies and Designations" document (2014).

## **Group 4 Sites**

Group 4 includes non-policy compliant sites which would conflict with either existing or emerging local regional or national policies. This group includes three ranked B sites, none of which are accessible to the general public and two of which are Urban Open Space. Another site is on Green Belt which if, subject to the redesignation of the adjacent primary school as Urban Oepn Space would become isolated, from the Green Belt.

## **Conclusion and Sites for Allocation**

Having assessed sites for their potential to meet the evolving demand outlined in the needs section indicative tables 11 to 13 in Appendix 3 illustrate the most sustainable site options to meet the projected need for new school sites. The ranking process highlights the necessity to fully explore all potential "A" ranked sites before the release of any Green Belt of Metropolitan Open Land sites can be considered as "exceptional circumstances".

It is important to note that individual site constraints will influence the scale and nature of detailed proposals in terms of design, transport and other impacts. To enable a full assessment of any detailed proposals for expansion or new provision at any of the sites, a range of supporting documents would be required with the planning application submitted, including a full Transport Assessment. The mitigation of potential impacts would appropriately be secured through details of the development, planning conditions and Legal Agreements.

The assessment indicates that, in addition to existing "A" ranked education and social infrastructure sites, where use as education would not require specific allocation or designation, further sites are required. The sites listed in Table 4 are recommended for allocation as education sites, in part or in whole, to enable the provision of new education establishments.

Table 4 Sites Recommended for Allocation, in whole or in part, for Education Facilities (Maps 1- 7 in Appendix 1)

Site	Ward
1 Westmorland Road	Bromley Town
Bromley Civic Centre, Stockwell Close	Bromley Town
Bushell Way	Chislehurst
Turpington Lane Allotments	Bromley Common & Keston
St Hugh's Playing Fields, Bickley Road	Bickley
Co-op Sports Ground, Balmoral Avenue	Kelsey and Eden Park
Land adjacent to Edgebury Primary School, Slades	Chislehurst
Drive	

In order to facilitate new school opportunities at the existing education sites, listed in Table 5 designation changes from Green Belt / MOL to UOS is recommended and allocations for additional education facilities.

Table 5 Site Recommended Re-designation from Green Belt or

Metropolitan Open Land to Urban Open Space and Allocation for

Additional Education Facility (Maps 8 – 10 in Appendix 1)

Site	Ward
Langley Boys and Girls School complex, Hawkesbrook	Kelsey and Eden Park
Lane	
The BET (Hayes Lane site) former BAPA / Kingswood	Bromley Common & Keston
PRU	
Midfield Primary / Grovelands site, Midfield Way	Cray Valley West

Additionally, to provide the flexibility to work in partnership with Academies to secure the delivery of necessary expansions over the plan period, and to produce boundaries that should sustain beyond the plan period the re designation to Urban Open Space (from Green Belt or MOL) is recommended at the existing school sites, in Table 6. All but 2 of these sites are already highlighted in the "Review of the Primary School Development Plan". Designation change would mean that the educational uses were no longer "inappropriate" by definition, although proposals would remain subject to all other policies of the plan and the Urban Open Space policy.

Table 6 Existing School Sites Recommended for Re-designation from Green Belt or Metropolitan Open Land to Urban Open Space (Maps 11 – 18 in Appendix 1,)

Site	Ward	
Scotts Park Primary	Bickley	
James Dixon Primary School	Crystal Palace	
Castlecombe Primary (& youth centre)	Mottingham & Chislehurst North	
Oaklands Primary (& community	Biggin Hill	
playground)		
St Mary Cray Primary	Cray Valley East	
Wickham Common Primary	Hayes & Coney Hall	
Mead Road Infants	Chislehurst	

Edgebury Primary (which additionally opens potential to the land adjacent, Map 7) Taken together the recommendations above enable the Council to meet the currently projected need for education places as set out in the Council's Primary School Development Plan (2015), and "Planning of Secondary School Places" (2015), and provide flexibility to address the currently projected gap as summarised below in Table 7.

Table 7: Education Proposals to Address Need in Forms of Entry (FE)

Ne	eed	Proposed	or Feasibility	To	otals	Gap (FE)
Extensions	New	Extensions	New Schools	Need	Proposed	
to Existing	Schools	(FE)			or	
(FE)					Feasibility	

Primary	20	10FE (5	17	10FE (5	30FE	27	-3
		schools)		schools)			
Secondary	4 – 9	24 - 31FE	7.5	24 – 30 FE	35FE	31.5 –	-3.5 to
		(4-5		(4-5 schools)		37.5	+2.5
		schools)					



## **APPENDIX 1**



Map1: 1 Westmoreland Road



Map 2: Bromley Civic Centre



Map 3: Bushell Way



Map 4: Turpington Lane



Map 5: St Hugh's Playing Field



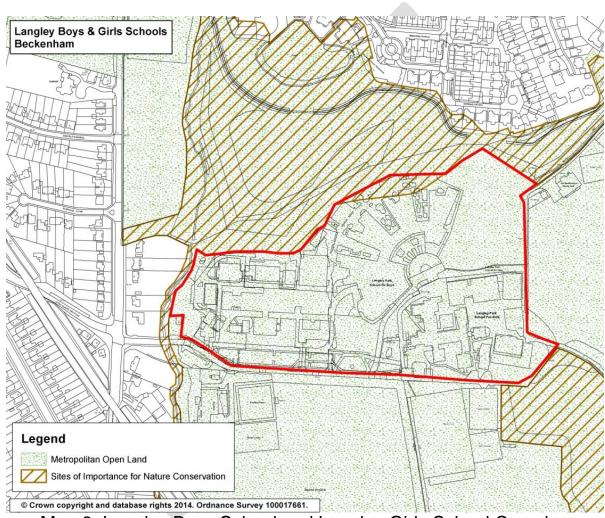
Map 6: Co-op Sports Ground





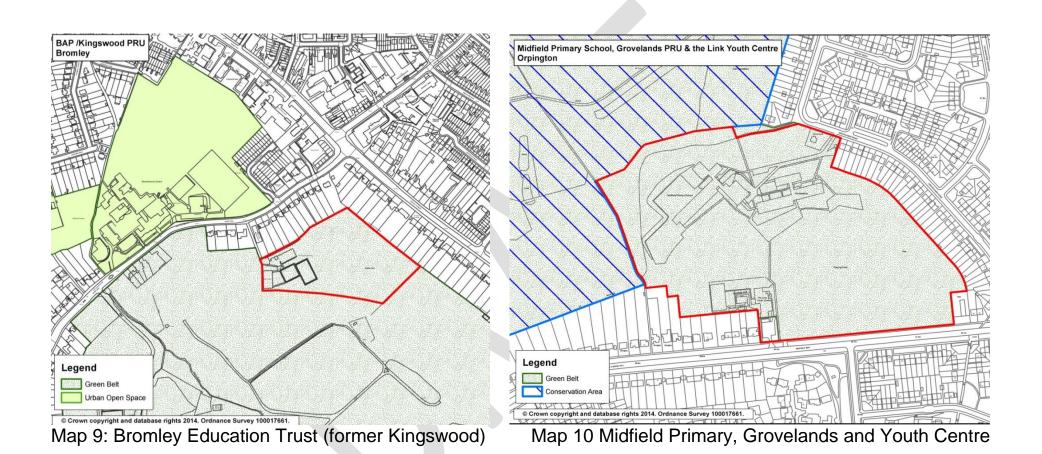
Map 7: Land adjacent to Edgebury Primary

# <u>Site Recommended Re-designation from Metropolitan Open Land to Urban Open Space and Allocation for Additional Education Facility</u>



Map 8: Langley Boys School and Langley Girls School Complex

# <u>Sites Recommended Re-designation from Green Belt to Urban Open Space and Allocation for Additional Education Facilities</u>



# Existing School Sites Recommended for Re-designation from Metropolitan Open Land to Urban Open Space



Map 11: Scotts Park Primary

Map 12: James Dixon Primary

# Existing School Sites Recommended for Re-designation from Metropolitan Open Land to Urban Open Space



Map 13 Castlecombe Primary (including youth centre)

## Existing School Sites Recommended for Re-designation from Green Belt to Urban Open Space



Map 14: St Mary Cray Primary



Map 15: Oaklands Primary

## Existing School Sites Recommended for Re-designation from Green Belt to Urban Open Space

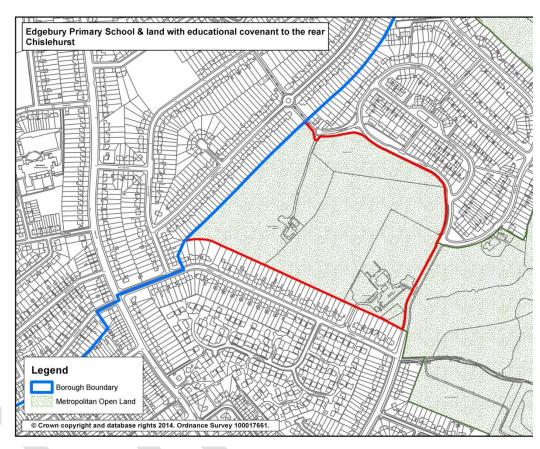


Map 16: Wickham Common Primary



Map 17: Mead Road Infants

## Existing School Sites Recommended for Re-designation from Green Belt to Urban Open Space



Map 18: Edgebury Primary (NB Highlighted land includes both Edgebury Primary school and the adjacent land identified in Map 7

## **Need for School Places**

## **Local Plan Process**

Academies Act 2010 - creation of Free Schools

## Primary Education Need (2009 - 11)

Primary Schools Development Plan (PSDP) Review 2009 - Expand 3 schools



## **Core Strategy Issues Document July 2011**

- Demographic changes (Issue 14)
- Changing nature of provision (Issue 15)

**Education Act 2011** – Local Authorities that need to create a new school must in most circumstances seek proposals for an Academy or Free School creation of Free

## **Primary Education Need (2012)**

 Primary Schools Development Plan (PSDP) Review Nov 2012 (EPDS Jan 2013) – proposed increased intake in 7 of 9 Education Planning Areas



## **Options and Preferred Strategy March 2013**

- Designate Education land,
- monitor need and allocate new sites as required
- develop criteria based policy for new sites

## Primary and Secondary Education Need (2013/14)

- Primary Schools Development Plan Review (EPDS Sept 2013 including 2011 Census data proposed increased intake in 7 of 9 Education Planning Areas
- Planning for Growth: Review of Secondary Education (EPDS Jan 2014) up to 30 additional FE by 2025



## **Draft Policies and Designations Feb 2014**

- Draft Policy 6.5, Education Land, extensions and allocations
- Draft Policy 6.6, criteria based policy
- Draft Policy 8.20, Urban Open Space, increased flexibility for educational development
- Call for Sites

## **Primary and Secondary Education Need**

- Primary Schools (PSDP)Review Sept 2013
  - over 20 additional FE through increased places at existing schools
  - $\circ$  up to 10 additional FE from 5 new Free Schools.
- Planning for Growth: Review of Secondary Education (Jan 2015)
   34 additionalFE by 2021.
  - o expansions at 7 existing secondary schools
  - 4 new secondary schools
  - o further extensions to existing schools or a 5th new school



## **Consultation (Summer 2015)**

- Urban Open Space (further amendment)
- Education Site Redesignations
- Education Site Allocations

## **Sequential Site Assessment**

- Sites grouped 1 4 according to the strategic policy constraints in respect of final Local Plan adoption (assuming the open space redesignations). Only the Group 1 sites are currently policy compliant.
- Sites within each group assessed and ranked A D according to the potential they offer

## **Primary and Secondary School Proposals**

Table 8. Existing Primary School Sites with proposals / potential for expansion (Primary School Development Plan 2014 agreed by the Council Jan 2015 (NB changes recommended to UOS where currently Green Belt / MOL designations)

FE	School	Expansion proposals	Open Space designations	Planning Status
1	Scotts Park	Expansion 2 to 3 FE	Metropolitan Open Land	planning application pending consideration
0.5	St Georges	Potential expansion to 2 FE	none	planning application pending consideration
0	Oaklands Primary	Extension to meet current 2FE intake	Green Belt	planning application anticipated
-	Southborough	Consider potential after 2017/18	Green Belt	
2	Princes Plain	Expansion from 2FE to 4FE	Green Belt	Planning application anticipated / part redevelopment of existing buildings
1	Edgebury	Expansion 1 to 2 FE	Green Belt	planning permission granted
1	Stewart Fleming	Potential expansion 2 to 3 FE	none	planning application pending consideration
1	Clare House	Expansion 1 to 2 FE	Urban Open Space	planning permission granted
1	Worsley Bridge	Expansion to 3 FE	Urban Open Space	planning permission granted
1	St Pauls Cray	Expansion 1 to 2 FE	none	planning permission granted
1	St Mary Cray	Consider potential after 2017/18	Green Belt	
1	Midfield Primary	Expansion 1 to 2 FE	Green Belt	
1	Leesons	Potential expansion 1 to 2 FE	Urban Open Space	
1	James Dixon	Potential expansion 2 to 3 FE	Metropolitan Open	
-	Farnborough	Consider potential after 2017/18	Green Belt	
0.5	Blenheim	Consider potential after 2017/18	Urban Open Space	
1	Parish Primary	Expansion 2 to 3 FE	Part Urban Open Space	planning permission granted
1	St Marks	Potential expansion 2 to 3 FE	none	
15	TOTAL			

## <u>Table 9. Title and add supporting text. Existing School Sites for consultation on changes for Open Space Designation</u> without current programmed expansion proposals (changes recommended to UOS where currently Green Belt / MOL designations)

FE	School	Current Open Space designations	Comment
1	Castlecombe Primary	Metropolitan Open Land	Feasibility study
	Wickham Common Primary	Green Belt	
	Mead Rd Infant	Metropolitan Open Land	

## **Secondary School Expansion Proposals**

## <u>Table 10</u> <u>Existing Secondary Schools which may offer potential for increased intake ("Planning of Secondary School Places" (2015), agreed by the Education Portfolio Holder Jan 2015)</u>

FE	Ward	School	Potential increased intake from
2	Bromley Common & Keston	Bishop Justus	2016/17
1	Darwin	Charles Darwin	2018/19
1	Bickley	Bullers Wood Girls	2018/19
1.5	Chislehurst	Chislehurst School for Girls	0.5 from 2015/16 : 1 from 2016/17
1	Chislehurst	Coopers	2017/18
1	Farnborough an Crofton	Darrick Wood	2016/17
1.3	Bromley Common & Keston	Ravens Wood	2016/17
8.8	TOTAL POTENTIAL EXPANSION	FE	

## **NEW PRIMARY SCHOOL SITES**

<u>Table 11 Indicative Site Options to Address Primary School Requirements</u> Potential sites indicated for 8 FE in new schools and a relocated school (Crystal Palace Free School site search)

<u>FE</u>	Potential Primary School	<u>Ward</u>	Potential Sites (rank)	Comment
2	Harris Free Shortlands Opened 2014	Shortlands	Kingswood House	Permission granted (work commencing on site) Located temporarily in 1 Westmorland Road
2	Harris Free Beckenham Agreed by Dept for Education -Opening deferred to Sept 2015	Kelsey & Eden Park	Harris Beckenham Secondary site (A2)	Temporary application for primary allowed on appeal on the Application for Primary being considered. No alternative sites of preferable ranking within EPA 2 have come forward
2	La Fontaine Free School Opened 2014 temporarily at	Bromley Town	Bromley Civic Centre (A1)	Policy compliant site, masterplan being prepared
	Princes Plain	Bickley	Widmore Centre (A1)	Policy compliant site. Not currently available but may present future potential for primary or secondary provision.
		Bromley Common & Keston	BET Hayes Site (B3)	In EPA 5 on the boundary with EPA 4, but lower rank requiring the demonstration of "exceptional circumstances" (including the absence of alternative sites) to justify Green Belt release. The site is also highlighted for potential secondary provision.
2	Crystal Palace Free School Agreed by Dept for Education -Opening deferred	Crystal Palace		EFA seeking policy sites in LBB and adjacent Boroughs
2	Langley Park Free School Agreed by Dept for Education - Opening Sept 2016	Kelsey & Eden Park	Langley Secondary Schools site (A1 or B3 dependent upon proposal)	In the absence of alternative sites of preferable ranking within the required location "exceptional circumstances" are advanced for the redesignation of Langley Girls and Boys school from MOL to UOS and a Primary Free School allocation is recommended.
1	Chislehurst St Nicholas (EXPANSION & RELOCATION)	Chislehurst	Bushell Way (B2)	In the absence of alternative sites of preferable ranking within EPA 6 an allocation be made for the potential relocated Chislehurst St Nicholas or alternative primary provision
11		TOTAL		

## **NEW SECONDARY SCHOOL SITES**

<u>Table 12 Indicative Site Options to Address Secondary School Requirements</u> 2 schools with DfE agreement for 6FE. Site specific constraints may limit these and the remaining possible 3 schools to 4FE – Potential for between 20 and 30FE)

FE	Secondary School & Timescale	Potential Sites (rank)	Ward	Comment	Free School Locational requirement	Land use designation change to UOS
6	Beckenham Academy (6FE plus 6 <sup>th</sup> form) opening 2016	Co-op Sports Ground (B4)	Kelsey & Eden Park	In the absence of alternative sites of preferable ranking within the Beckenham area an allocation be made for the potential development of the Beckenham Academy secondary school	the Beckenham area	
6	Bullers Wood Boys (6FE) opening 2016	St Hugh's Playing field (B4)	Bickley	In the absence of alternative sites of preferable ranking within the vicinity of the Bullers Wood Girls School an allocation be made for the potential development of the Bullers Wood Boys secondary school	Near the Girls School - shared resources / management	
12- 18	Potential further 3 secondary	All Saints (A1)	Hayes & Coney Hall	Policy compliant site available but distance to Bromley college may be a factor to justify setting this site aside.		
	schools required from 2016, 2019 and 2021 onwards.	Widmore Centre (A1)	Bickley	Policy compliant tight site currently in use.		
		BET Hayes Site (B3)	Bromley Common & Keston	A1 policy compliant sites prioritised unless justification of "exceptional circumstances" can be demonstrated to support alternative less		From Green Belt
		Land adj Edgebury Primary (B4)	Chislehurst	favourable B ranked sites.		From Green Belt
		Turpington Lane (B2)	Bromley Common & Keston			From Green Belt
24 - 30	TOTAL NEW S	ECONDARY SCH	HOOL FE	,	1	1

<u>Table 13</u> <u>Indicative Site Options to Address Other Educational Requirements</u>

Facility	Timescale	Locational requirement	Potential Sites (assessment rank)	Comment
<b>Bromley College University</b>	opening	Central	1 Westmorland	In Education Funding Agency (EFA) ownership.
Technical College (UTC for	2016	Bromley	Rd (A1)	Temporary location for Harris Shortlands Primary, whilst
14 – 18 yrs)				the Kingswood House site is built.
Social, Emotional and		Linked with	Midfield /	Subject to the demonstration of the necessity for links to
Mental Health Specialism		existing	Grovelands	existing provision at Grovelands and in the absence of
		provisions	School Site (B3)	alternative sites of preferable ranking "exceptional
				circumstances" are advanced for the redesignation of the
				Midfield Primary / Grovelands Site from Green Belt to
				UOS and a Free School allocation is recommended.

"Indicative Tables" illustrate the most sustainable locations for school development, having regard to the limited availability of appropriate sites and the national and regional guidance in respect of the "great importance attached to ensuring sufficient choice of school places". The constraints of the sites have been assessed and they are considered to provide realistic opportunities for school development to address the current and projected need for education facilities. There will, as part of subsequent planning applications, need to be robust assessments of the impacts, including for example highways implications, and appropriate mitigation and conditions attached if planning permission is to be achieved.

## Relevant Emerging Local Plan Policies (Draft Policies and Designations Document Feb 2014)

Draft Emerging Policy 6.5 sets out the overarching education policy

The Council is committed to choice in education for parents and young people and will work in partnership with agencies and providers, to ensure the provision of an appropriate range of educational facilities to cater for lifelong learning across the spectrum from early years to further and higher education, and including specialist provision. It will achieve this by:

- i. assessing the need for the range of education infrastructure over the plan period and allocating sites accordingly,
- ii. defining land with permitted use for education purposes, including the sites of schools, colleges and purpose built day nurseries, as "Education Land" and safeguarding these sites for education purposes for the period of the plan. Whilst Education Land and buildings may also perform dual functions for wider community use, the redevelopment of education land for alternative uses will not normally be permitted,
- iii. permitting extensions to existing schools which seek to address local need, subject to Local Plan open space and conservation policies, 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. Proposals for school extensions on land adjacent to Education Land will also be considered favourably.

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 Emerging Policy 6.6 sets out the approach to new school sites

The Council will support for 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.

Particular weight will be attached for proposals involving the relocation of a Free School, which has operated from a site temporarily for a year, to a more suitable location.

Where Free Schools have operated from buildings for a year under Permitted Development (Class K), and, having been unable to secure a more appropriate location, are required to seek planning permission to remain permanently, applications for planning permission, will be supported subject to compliance with the limited requirements under "The Town and Country Planning (General Development) (Amendment) (England) Order 2013 Class C", which enables permanent changes of use.

In all cases new buildings should be sensitively designed to minimise the 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.

#### Schools on Urban Open Space

Draft emerging Policy 8.20 has been out for consultation as part of the "Draft Policies and Designations (2014)" document and carries some weight. Noting that draft emerging Policy 6.6 "Education Facilities" recognises that the expansion of existing schools can be the most efficient use of resources. The draft emerging Urban Open Space policy seeks to respond to need by further facilitating proposals on existing education sites in designated Urban Open Space, whilst seeking "to ensure that the impact on the open nature of the site is limited as far as possible without compromising the educational requirements".

#### Draft Policy 8.20

Proposals for built development in 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.

Where there is a demonstrable need for additional educational buildings sensitive 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.

