

SECTION '1' – Applications submitted by the London Borough of Bromley

Application No : 15/02597/FULL1

Ward:
Clock House

Address : Stewart Fleming School Witham Road
Penge London SE20 7YB

OS Grid Ref: E: 535124 N: 168969

Applicant : Pioneer Academy

Objections : YES

Description of Development:

Part demolition to rear and demolition of single storey front element and erection of two storey building to northern elevation with roof level amenity area, two storey front extension with enclosed roof level games area, landscaping and expansion from 2FE to 3FE

Key designations:

Biggin Hill Safeguarding Birds
Biggin Hill Safeguarding Area
London City Airport Safeguarding
Smoke Control SCA 30

Proposal

Proposal

This application seeks permission for reorganisation and expansion of the school facilities through demolition of existing classrooms, hall, kitchen and WCs and construction of new classrooms, specialist teaching spaces, 2 new large halls, kitchen, staff and WC facilities. The proposal comprises:

- Erection of a part 1/part 2 storey extension along the northern boundary. The extension has been designed with a pitched roof to 3 sides concealing a roof level amenity space
- Erection of a ground floor extension with a roof top Multi Use Games Area (MUGA) along the western boundary
- Increase in school capacity from 2FE to 3FE (additional 203 pupils and 22 staff - 427 pupils and 75 staff in total)
- A new service access will be provided on Felmingham Road (with deliveries via an on street collection point).
- The main visitor entrance on Felmingham Road will remain.
- New additional pedestrian access point will be created from Witham Road
- Erection of cycle shelter to provide 20 new cycle parking spaces (40 in total)
- No existing parking onsite and none proposed

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

Air Quality Assessment (prepared by agb Environmental)

This report assesses the air quality impacts associated with the construction and operation of the proposal. The report suggests that the construction phase will have the potential to create dust it will therefore be necessary to implement mitigation measures to minimise dust emissions. The operational impacts are not considered to be significant.

Arboricultural Impact Assessment (prepared by agb Environmental)

This report sets out details of the tree survey undertaken. The results of the survey are that there are 11 trees and 1 hedge of moderate quality within the school grounds, 6 trees which are dead and should be removed irrespective of the development, 3 trees need to be removed as a direct consequence of the development and suggest that there no trees of high quality or value within the grounds. The site is not within a conservation area and none of the trees are protected. The proposed landscaping strategy includes replacement trees.

The report sets out details of the how tree woks will be undertaken and how retained trees will be protected during the development.

Community Engagement Report (prepared by CgMs)

This repots confirms that public engagement was undertaken by the applicant prior to submission of the application comprising:-

- Letter drop to properties surrounding the site, parents and councillors
- An exhibition was held at the school and an opportunity for feedback provided

A total of 53 residents responded to the public consultation as well as responses from residents. The responses are summarised in the document.

Design and Access Statement (prepared by Bailey Partnership)

This documents sets out an analysis of the site constraints, details of the proposal in respect of form, mass and appearance and access arrangements. The report confirms that the school expansion is required to meet local demand and need for school places as the existing school is operating at full capacity.

Daylight and Sunlight Assessment and Additional Statement (prepared by GIA Consultants)

The assessment has been prepared in accordance with BRE Guidance 'Site Layout and Planning for Daylight and Sunlight - A Guide to Good Practice' by a suitably qualified consultant. The assessment looks at daylight and sunlight impact on rooms as well as overshadowing of gardens for the following properties:-

- 29 to 47 Felmingham Road (odd numbers only)
- 27 - 47 Sheringham Road (odd numbers only)
- 25 - 28 Suffield Road

The report concludes that there is unlikely to be any noticeable loss of daylight or sunlight to the majority of properties assessed. Save for the 3 properties discussed below all other dwellings would still meet BRE Guidelines once the proposed development has been undertaken.

The following properties would be affected by the proposed development to an extent falling below BRE guidelines:

26 Suffield Road

Front and rear gardens have been assessed in order to establish whether the amenity spaces will still receive adequate sunlight throughout the year (50% of the area should receive 2 hours of sunlight on 21st March).

The report concludes that the front garden will fall below BRE Guidelines as only 45% of the garden will receive 2 hours of sunlight on 21st March. The rear garden will continue to meet guidelines with 99% of the garden meeting BRE levels.

Consequently the report concludes that the impact on this property is minor adverse.

27 Suffield Road

There are 9 windows serving 8 rooms within this dwelling.

One ground floor window will see a moderate reduction in daylight as a result of the proposal falling below BRE Guidelines. However, the room is served by a second window which would still meet BRE Guidelines. Consequently the room will receive no alteration in daylight distribution.

In respect of sunlight 4 windows would be affected by the proposal experiencing alterations below the recommended guidelines. However, one of the ground floor windows already falls below the recommended guidelines; two of the ground floor windows appear to serve a kitchen thus having a lower requirement for sunlight than other habitable rooms such as living rooms and the first floor window which serves a bedroom already falls below guidelines. Furthermore bedroom windows are also not considered to require the same level of sunlight as living rooms. The report notes that 3 of the 4 windows face east. BRE Guidelines acknowledge that windows that face east or west are less likely to receive adequate levels of sunlight.

Overall the report concludes that the impact of the proposal, on this property is moderate adverse in significance.

28 Suffield Road

Front and rear amenity spaces were tested. The front garden will be affected by the proposal and will fall below BRE Guidelines (81% before the development dropping to 18.23% with the development in place). However, the rear garden will continue to meet guidelines with 93% of the garden receiving 2 hours of sunlight. Consequently the report concludes the impact would be minor adverse.

Energy Assessment (prepared by Tsengi Building Simulation)

The report has been prepared in accordance with London Plan Policy 5.2. A full assessment of all renewable technologies has been undertaken. It is proposed to utilise Photo Voltaic Panels (116 sqm) with a 35% reduction in carbon emissions.

Flood Risk Assessment (prepared by agb Environmental)

The report states that the site is within Flood Zone 1. The report sets out the details of existing foul, surface and roof level drainage across the site. It is proposed to discharge additional foul and surface water run-off into the existing system. The report concludes that it is not considered necessary to incorporate flood risk mitigation.

Geo-Environmental Site Assessment (prepared by REC)

This report concludes that due to the industrial history of the site a detailed Phase II Intrusive ground investigation should be undertaken.

Noise Impact Assessment (prepared by Red Twin Limited)

The assessment considers the impact of the new extension and raised play decks/amenity space. The report comprises an assessment of the existing noise climate, together with the predicted impact of using the proposed additional facilities. The report suggests that noise emissions from the outdoor play areas would not affect properties on Suffield Road to the north of the site but there would be a minor impact on properties in Witham and Sheringham Road. The most significant impact would occur during school break times. The report concludes that subject to design mitigation roof top play spaces are unlikely to result in the same sorts of noisy behaviour as those experienced in the playground and that noise levels would remain within acceptable limits.

In response to initial comments made by the Council's Environmental Health Officer Red Twin Limited provided further details about the proposed acoustic screening for the MUGA.

Planning Statement (prepared by CgMs)

This document sets out an analysis of the site and surrounding area and an assessment of the proposal against development plan policies.

Transport Assessment and Additional technical Note (prepared by Paul mews Associates)

The TA comprises a site assessment audit, baseline traffic surveys and accident data, an assessment of traffic generation and impact, parking and servicing proposals and construction logistics. The report confirms that the school currently operates with 427 pupils and 53 staff which will increase to 630 pupils and 75 staff. A new service access will be provided on Felmingham Road. The main visitor entrance on Felminham Road will remain and a new additional pedestrian access point will be created from Witham Road.

The school will update the current travel plan to take account of the proposal.

The TA concludes that any traffic generated from the proposal would not result in conditions prejudicial to the free flowing traffic on the adjoining road network. The increase in traffic generation could be adequately accommodated and the lack of onsite parking is acceptable.

In response to initial comments raised by the Council's Highways Officer an additional technical note was submitted. The technical note confirms that the

school will expand from 2 form entry to 3 form entry which will result in an additional 203 pupils and additional 22 staff. Of the additional staff and pupils 59 pupils and 11 staff are expected to access the site by car, 4 pupils will access the site by car sharing. The technical note provides further clarification in respect of parking beat surveys undertaken in the morning and afternoon and proposed mitigation in the travel plan.

The technical note confirms that the school does not have any existing car parking facilities and it is not possible to provide any onsite parking.

Location

The site is located to the northern edge of Witham Road and forms the junction with Felmingham Road to the north-eastern boundary. To the south-west of the site are the rear of the properties facing onto Sheringham Road whilst to the north-west of the site (the rear) are the properties of Suffield Road which adjoins perpendicular the site. Footpaths are present to the rear of the properties at Sheringham Road and Suffield Road and run for the entirety of the boundary with No.27 Suffield Road and No.32 Felmingham Road.

The area is characterised by two storey terraced dwellings forming a tight urban grain typical of the wider locality. As such the school, with its recreation area set to the front and occupying the land forming the junction with Witham Road and Felmingham Road, represents a break in this urban form and positively contributes to the spatial standards of the area with Beckenham Crematorium and South Norwood Country Park to the south being severed by the east to west railway line behind the properties of the southern edge of Witham Road.

The school itself comprises a linear one and two storey block set close to the north-western boundary as well as a detached single storey classroom block. The site is set below street level with steps down to the playground from the access with Witham Road. Servicing is typically from the access to Suffield Road.

Consultations

Comments from Local Residents and Amenity Societies

This application was advertised in the local press, site notices were erected and letters sent to nearby properties.

At the time of writing 30 letters of objection had been received. The following issues have been raised in respect of objections:

- o Traffic is already congested in this area, the proposal will make this worse
- o More parents will park in surrounding streets
- o The rooftop play area will result in loss of view and noise nuisance
- o The transport assessment contains inaccurate information more than 31% of pupils and 50% of staff drive to the school
- o As a successful school this school will attract pupils from outside of the area
- o Parents do not park considerably
- o The design would be out of character with the area
- o The proposal will result in a loss of light

- o If the MUGA is used at the weekends and evenings this will exacerbate noise and traffic issues
- o There will be an increase in traffic related accidents
- o There is no playing field on this site, the proposal will use up even more playground space
- o The proposal is disproportionate in scale
- o There are other schools in the borough which could be extended
- o The police have been involved in traffic issues in the surrounding streets
- o There will be an increase in overlooking and loss of privacy
- o House prices will drop if this proposal goes ahead
- o This school is already over populated which is a health and safety issue
- o There will be issues of noise and dust during construction
- o What compensation will there be for residents if this goes ahead
- o The proposal will give rise to security issues for neighbours
- o There will be an increase in litter
- o Any floodlights will harm neighbours
- o The MUGA should not be used after 18:00
- o The proposal will result in the demolition of the boundary wall at No.31 Sheringham Road - what will happen to the boundary_
- o Pupils will be affected by cramming them into this site
- o More traffic calming measures are needed

The applicant was asked to comment on the issue raised with respect to the demolition of the boundary wall at No. 31 Sheringham Road. They commented as follows:

"The boundary wall at this point is the school's wall and this is required to be removed once the building is demolished as it would not be structurally safe to leave it in place, particularly given its height.

Either side of the wall in question the boundary consists of metal fencing. The intention is to resecure the boundary with the same metal fencing which secures the school boundary to the rear of the Sheringham Road properties and provide additional timber fencing to the Sheringham Road properties face of the boundary, as can be found along the whole length of this boundary elsewhere. The boundary will therefore be continuous and matching between the school and Sheringham Road properties. The additional timber fencing will add a visual barrier in addition to the physical barrier. The existing metal fencing is approximately 1.6m high and the proposed boundary treatment would not seek to alter this. The trees close to the boundary will remain and new landscaping treatments have been proposed which will further soften the boundary between Sheringham Road and the proposed extension. A Party Wall Surveyor will be appointed to manage all boundary matters.

During construction the property in question will at all times be secure. Access will be required to demolish the wall and install the new boundary treatment and again this will be agreed through a Party Wall Surveyor. The main contractor will ensure that all neighbouring properties are secure through the use of temporary hoardings both to keep the properties and the contractor's site secure.

There will not be any overlooking of any properties on Sheringham Road due to the height of roof deck barriers from any of the roof decks and games area. The use of frosted glass high level windows restricted to opening only 100mm (this allows some degree of ventilation to the rooms but provides safety and security as well as preventing overlooking) will ensure that windows facing neighbouring properties do not cause overlooking"

At the time of writing no letters of support had been received.

Additional comments received will be reported to the committee.

Comments from Consultees

Thames Water: No objection, informatives recommended

Drainage: Reviewing the submitted FRA carried out by agb Environmental Ltd with report Reference No. p2339.6.1 dated 11/06/2015 I note that the applicant is committed to provide storage to mimic the existing pre-development regime, I do not agree with this approach and require surface water run-off rates and volumes from development to be managed in accordance with the London Plan which sets higher standards than the NPPF for the control of surface water run-off, Policy 5.13. A condition is recommended.

Highways (summary - full comments incorporated into the analysis below): Concerns were raised with the original Transport Assessment and lack of onsite parking provision. In response to initial concerns raised a further technical note was submitted. The proposal is considered to be acceptable from a highways perspective subject to recommended conditions.

Environmental Health: Noise: The conclusion of the report is that at certain times of day (break times) in two of the four assessed locations there would be a minor or moderate negative impact from noise. In one location there would be no change and in one an improvement in noise climate. Overall the noise levels are expected to increase and the change would be noticeable to affected residents. When averaged over 16 hours the changes are small but the proposal does potentially result in moderate negative impact for some residents at specific times of day, several times a day, during the school term. The results of the assessment have an inherent uncertainty owing to the difficulty in modelling this type of noise source.

Whilst there is a potential small detrimental impact in some locations clearly there are also other benefits with this application. It may be considered more of a Planning matter whether the potential detriment justifies the benefit. In purely noise terms there could be some detriment to local amenity although overall noise levels would remain reasonable.

Acoustic screens have been designed around the roof top amenity spaces to limit adverse noise impact. Additional details of the screens have been provided. The details are considered to be acceptable and conditions are recommended to ensure that they are implemented and retained. The MUGA should only be used Monday - Friday 08:00- 18:00.

Contamination: The Phase 1 report finds further site investigation is necessary therefore attach standard condition K09.

Air Quality: A Construction Logistics Plan should be submitted. A condition is recommended.

Tree Officer: The quality of the existing tree stock appears to be generally poor. I concur with the recommendations in the arboricultural report and agree that tree losses are acceptable. In respect of landscaping, the majority of existing trees located along Witham Road and Felmingham Road frontages are shown retained within the scheme. In terms of screening, the planting plan shows advanced nursery stock tree planting concentrating along the sites southwest boundary. These are likely to help disrupt views and soften the bulk of the building as seen from this elevation. Tree planting to the sites northern boundary is not likely to be possible due the distance separation between the new building line and adjoining residential properties. Landscape intervention is extended into the existing areas to the front of the building, however I would also suggest a review of existing tree cover along the road frontages in view of introducing supplementary tree planting.

Education Services: No comments received

Planning Considerations

Planning Considerations

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

T2 Assessment of Transport Effects
T3 Parking
T6 Pedestrians
T7 Cyclists
T15 Traffic Management
T18 Road Safety
BE1 Design of New Development
C1 Community Facilities
C7 Educational and Pre School Facilities
NE7 Development and Trees

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

Policy 6.5 Education
Policy 6.6 Education Facilities
Policy 7.1 Parking
Policy 7.2 Relieving congestion
Policy 7.3 Access to services for all

In strategic terms the most relevant London Plan policies are:

Policy 3.18 Education Facilities
Policy 5.1 Climate Change Mitigation
Policy 5.2 Minimising Carbon Dioxide Emissions
Policy 5.3 Sustainable Design and Construction
Policy 5.5 Decentralised Energy Networks
Policy 5.6 Decentralised Energy in Development Proposals
Policy 5.7 Renewable Energy
Policy 5.11 Green Roofs and Development Site Environs
Policy 5.12 Flood Risk Management
Policy 5.13 Sustainable Drainage
Policy 6.3 Assessing effects of development on transport capacity
Policy 6.9 Cycling
Policy 6.10 Walking
Policy 6.11 Smoothing Traffic Flow and Tackling Congestion
Policy 6.13 Parking
Policy 7.1 Lifetime Neighbourhoods
Policy 7.2 An Inclusive Environment
Policy 7.4 Local Character
Policy 7.6 Architecture
Policy 7.8 Heritage Assets and Archaeology
Policy 7.14 Air Quality
Policy 7.15 Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and promoting Appropriate Soundscapes
Policy 7.19 Biodiversity and Access to Nature
Policy 7.21 Trees and Woodland

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

Planning History

The school first opened in 1939 and has been subject to numerous planning applications. The following are the most relevant:

99/00138 Planning permission granted 15th April 1999 for a single storey extension to provide 4 classrooms and office and toilet accommodation and formation of pedestrian access

02/01830 Planning permission granted 15th August 2002 for single storey extensions to form store room and cloak room.

10/01722 Planning permission granted 13th December 2010 for a bicycle store, 2 timber storage sheds, 2 play area enclosures with artificial grass surface, new pedestrian ramp with handrail and balustrade and gate access and free standing canopy to pre-school classroom.

12/01057 Demolition of existing kitchen annexe building and cloakroom and erection of new single storey infill building to accommodate new kitchen annexe and toilets.

15/01691 Temporary two storey, four classroom modular block with entrance lobby, toilets, stoves and associated external works including ramps and steps. Pending consideration.

Conclusions

Conclusions

The main issues to be considered are:

- o Principle and Educational Need
- o Temporary accommodation
- o Design
- o Landscaping and impact on trees and ecology
- o Highways impact
- o Impact on neighbouring amenity
- o Sustainability

Principle and Education Need

The school is currently a 2FE operating at full capacity; an extension is required to enable the school to meet local need.

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

The NPPF, para 72 states that

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

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

In this regard pre application meetings were held outlining the planning issues affecting the site.

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

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

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

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

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

Local Plan Allocations Consultation (Autumn 2015)

In September 2015 the Council will be consulting on allocations to address the objectives of the emerging Local Plan. The proposed allocations have been reported to Development Control and Executive (13th and 15th July) are therefore in the public domain. The requirements for additional forms of primary education are outlined and, in addition to extensions to many existing schools the consultation involves 5 new primary schools. These proposals reflect those identified in the "Review of Primary School Development Plan" (Jan 2015), which, as indicated below, includes the expansion of Stewart Fleming Primary from 2 to 3 FE.

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

Stewart Fleming is a 2 form entry school (60 reception children) located within Education Planning Area 1 on a tight urban site. Last September, the school took a "bulge class" (an additional reception class producing an intake of 90 children).

Need for Primary School Places

For education place planning purposes the Borough is divided into 9 Education Planning Areas and in recent years the School Places Working Party has met annually and reports the "Review of Primary School Development Plan" to the Education PDS and Portfolio Holder. This review sets out the pressure for places and proposals to address the need.

The need for primary school places in Bromley is identified in the "Review of Primary School Development Plan", produced by the "School Places Working Group" and approved by the Education Portfolio Holder Jan 2015.

With reference to Planning Area 1 the School Places Working Group advised that

- the area remains one of the most volatile area in terms of rising demand for places. The numbers of 4 year olds in this area remains about 2FE above the total number of available places.
- bulge classes were added at James Dixon and Stewart Fleming to meet the Sept 2014 demand, and were fully subscribed
- a new free school opening in Crystal Palace should provide some additional capacity here as well as in neighbouring boroughs, depending upon its ultimate location

The report recommended that the projected school roll for Education Planning Area 1 in 2015 and thereafter (with rolls indicated as levelling off around this new high) could be addressed through the permanent expansion to 3 FE of both Stewart Fleming and James Dixon and the opening of the Crystal Palace Free School (although the potentially limited contribution of the Crystal Palace Free School to meeting Bromley's need should be noted).

In summary local, regional and national policies lend strong support proposals to meet education need and planning permission should be granted "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." There is significant pressure for additional primary school places, particularly in Planning Area 1 and consequently when weighing up relevant planning considerations significant weight should be given to the fact that there is a demonstrable need to expand this school and the proposal would comply with development plan policies in this respect.

Temporary Accommodation

Temporary planning permission is sought under a separate application (15/01691) for the erection of a two storey classroom building to be used whilst refurbishment work is undertaken on the existing school site and to facilitate future expansion plans. The temporary building will be located within the existing playground to the south-east of the site at the junction of Witham Road and Felmingham Road. The classrooms are sought for a period of two years ending in August 2017.

The building is two storeys in height and will feature four 59sq.m classrooms and toilets, lobby and storerooms on each level. Access is provided primarily by a ramped access to the north-west elevation which faces into the school site, with two ground floor exits/entrances to the ground floor classrooms.

This temporary proposal does not encompass any increase of pupil or staff numbers and the proposed classrooms are sought for decant purposes only. The temporary decant accommodation proposed to facilitate the future expansion works which are subject of this application will be integral to local policy and statutory responsibilities and will be required to meet the demand in 2015/16 for primary places.

Landscaping and Trees

Policy NE7 requires proposals for new development to take particular account of existing trees on the site and on adjoining land. Policy BE1 requires new development to include attractive landscaping which takes account of the proposed use and surrounding context. Landscaping is an important design consideration in respect of visual and residential amenity.

A detailed landscaping proposal has been submitted. The proposal comprises:-

- o 2m high timber fencing on the western boundary, 1.8m fencing on the northern boundary, 1.0m high railings on the western boundary and 1.6m high railings on the southern boundary
- o Retained trees along the south, east and west boundaries
- o 31 new trees and soft planting along the east and west boundaries and within the playground
- o A mix of hard surfaces within the school grounds
- o Inclusion of a pond, 3 bird boxes and 3 bat boxes

Existing and proposed levels have been shown on the landscape plans. The proposal would not result in any change in levels across the site.

The landscaping proposal reflects the use of the site, the need for hard surfacing for pupils and soft landscape to improve the relationship with properties along Sheringham Road. The landscape strategy and replacement tree planting is largely considered to be appropriate and fit for purpose. However, the Council's Tree Officer is of the view that additional tree planting could be introduced to the southern boundary and therefore a condition is recommended.

Ecology

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

This application was supported by a Habitat Survey which confirms that some of the mature trees on site could have the potential to support nesting birds and stag beetle beetles. Mitigation is suggested in the form of the creation of beetle loggeries and bird boxes as part of the detailed landscaping submission and a condition to control works during the breeding season.

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

Design

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

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

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

The proposal comprises two main elements, a part one/part two storey extension on the northern part of the school building, this element would have a roof top amenity space and a ground floor extension with roof top MUGA on the western edge of the school site. The proposed extensions have been sited along the boundaries to maximise the limited space within the site and to respect existing built form on the site. Existing extensions/building will be demolished to accommodate the proposal.

It is acknowledged that this is a constrained site in a densely populated setting. Existing school buildings are located close to rear gardens and space within the site is limited. The amount of new development has been set by strict funding

criteria and requirements set out in legislation which seeks to control space standards for schools. Given the constraints of the site it has been necessary to utilise rooftop amenity facilities to meet required standards. The location of the extensions is considered to be logical and appropriate given the constrained nature of the site and is considered to be acceptable subject to detailed design measures to prevent harm to neighbouring properties.

Western Extension

The proposed western extension has been designed as a recessed ground floor extension with roof top MUGA that would oversail the ground floor. The ground floor element would be constructed of bricks to match the existing building with dark grey fenestration. The proposed MUGA would comprise 4m high concrete posts supporting 3m high fencing. The fencing on the south and west sides would be clad with Trespa Panels in 3 shades of green adding a contemporary appearance to the development. A solid dark grey backing board would be installed behind the Trespa Panels to provide an acoustic screen and prevent overlooking into the gardens of properties in Sheringham Road. The Trespa Panels are lowered to 1.2m high along the western edge to enable views of the MUGA from the playground. The northern edge of the MUGA would comprise a brick wall. The proposed MUGA would represent an increase in the mass and scale to the western boundary and the rear gardens of the properties of Nos.25-47 Sheringham Road as well as an increased level of built form within the street scene given the proximity to the boundary with Witham Road. However, it is considered that the extension can be accommodated in this location without giving rise to unacceptable harm to neighbouring properties and the design of the extension would result in a high quality contemporary addition.

Northern Extension

The proposed two storey extension would be constructed of brick to match the existing building with profiled sandblasted glass within the stairwells and across the upper level of the hall spaces to help break up the mass of the block. The extension would have a pitched roof on the north, east and west sides which would conceal the roof top amenity space and running track. On the southern edge glass balustrading will provide views of the amenity space from the playground. The northern elevation has been broken up by utilising a range of recesses rather than a continuous façade. The extension would step down to single storey with roof top amenity space on the western edge. It is proposed to erect a 2m high sandblasted glass screen on the west elevation of the lower roof deck to protect residential amenity. Profiled zinc sheeting with matching zinc rainwater goods and dark grey fenestration will be utilised to complement the brick pallet.

The limited availability of space and the competing pressure for teaching space and outdoor recreational space has resulted in an innovative approach to the development, which increases the amount of play space and amenity space available. It has been necessary to design in appropriate acoustic and privacy screening in order to demonstrate that there would not be significant impact on the noise levels. As discussed below this has been achieved.

Overall the design approach for both elements of the extension is considered to be fit for purpose and subject to conditions to control detailed execution will result in a good quality development.

Impact on highways and parking

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

London Plan and UDP Policies encourage sustainable transport modes whilst recognising the need for appropriate parking provision. Policies T1, T2, T3, T6 and T18 relate to the Council's requirements in terms of parking, transport assessments, highway safety in addition to London Plan Policies under section 6 including Policies 6.8 (Coaches), 6.9 (Cycling), 6.10 (Walking) 6.13 (Parking).

The applicant has submitted a Transport Assessment (TA) which sets out details of the highway, traffic and parking implications of the scheme. The Council's Highways Officer raised concerns with the transport assessment as originally submitted in respect of clarity over parking beat surveys undertaken and lack of onsite parking provision. In response to the concerns raised the applicant submitted a Technical Note providing more detail in respect of parking beat surveys and the proposed travel plan. The applicant re-confirmed that it is not possible to provide any onsite parking.

The school fronts onto Witham Road and is bounded by Felmingham Road, Sheringham Road, and Suffield Road. The school's main pedestrian entrance is from Felmingham Road, with another gated pedestrian entrance is located on Witham Road. The site is located in an area with low PTAL rate of 2.

The school currently has 427 pupils and 53 staff. The proposal will see the school's capacity increased to a 3FE throughout, which means there will be three classes of 30 pupils per year group. Therefore the school's capacity will increase to 630 pupils from reception to years 6. The number of school staff is expected to increase to 75 staff. This translates to 203 additional pupils and 22 extra staff members.

The site does not provide off-street parking for its staff. The main service vehicle entrance is at the north of the site and is accessed from Suffield road. The school also has a vehicle access on Felmingham Road for emergency vehicles only. The site access arrangements will change, with a new service access provided on Felmingham Road. The main visitor entrance accessed from Felmingham Road

will remain, and there will be an additional pedestrian access point on Witham Road.

There will be no off-street car parking provided under the proposal, which is regrettable. However, the existing school operates with no onsite parking, this application must be considered on the basis of the additional pupils and staff only and cannot be used to rectify the fact that the school currently operates with no parking provision. Notwithstanding this the applicant has been asked if it is possible to provide any onsite parking facilities but due to the constrained nature of the site it is not possible.

Traffic surveys have been undertaken - data was collected from Monday 2nd to Sunday 8th February 2015 during normal school term time and during a period when all of The school was fully operational. The results indicate that Witham Road carries an average total of 968 northbound vehicles and 1091 southbound vehicle movements on a typical weekday. The recorded peak periods occur from 0800-0900 with a total of 219 two-way vehicle movements, and from 1700-1800 with a total of 195 two-way vehicle movements on a typical weekday.

In respect of baseline traffic data, the most recent iteration of the schools Travel Plan is from September 2013. The survey indicates that the pupil main mode of travel survey are as follows:

163 (42%) pupils travel to school on-foot.

In terms of drop off

111 (29%) pupils get dropped off alone by car,

9 (2%) pupils car share,

16 (4%) students cycle,

4 (1%) pupils travel by train,

29 (7%) pupils travel by bus,

4 (1%) pupils travel by tram

52 (13%) pupils travel by scooter.

Bromley Council provided the following travel survey data for staff (carried out in September 2013)

50% (21) of the school staff travel to work by car,

38% (16) walk,

5% (2) travel via rail,

5% (2) travel by bus

2% (1) cycle to work.

In respect of traffic generation impact, the proposal will see the school capacity increased from 2FE to 3FE. Using the travel mode split the projected increase in modal trips generated by the additional 203 pupils and 22 staff arising from the development proposal as follows: an additional 85 pupil trips on foot, inbound in the morning peak period and outbound in the afternoon peak period. The proposal is expected to generate an additional 59 car and further 4 car share set downs both in the morning and in the afternoon peak periods.

Of the 22 additional members of staff, eight are projected to walk to the site under the proposal and 11 are predicted to drive alone.

On-street parking surveys were undertaken using the Lambeth Methodology in order to assess the impact of the proposal on the surrounding road network. The parking survey area is split into individual street and sections of street comprising of the following:

Road	Kerb side inventory			
	Unrestricted		Disabled	
	Meters	Spaces	Meters	Spaces
Ashleigh Road	65	13	-	-
Elmers End Road (A214)	-	-	-	-
Flemingham Road	260	52	10	2
MacKenzie Road	45	9	-	-
Marlow Road	215	43	-	-
Piquet Road	155	31	.	.
Samos Road	65	13	-	-
Sheringham Road	305	61	-	-
Suffield Road	185	37	5	1
Tremaine Road	60	12	-	-
Warwick Road	190	38	-	-
Witham Road	360	72	-	-
Total	1905	381	15	3

Parking surveys were carried out on Wednesday 28th January 2015 in 15 to 20minute 'beats' between the hours of 0730 - 0915 and 1445 - 1615; hence capturing peak school traffic times.

Additional information was submitted in the technical note - The results of the surveys undertaken by the applicant demonstrate that at 0840-0855 in the morning peak there were a total of 97 free car parking spaces in the roads adjoining the site. However in respect of the two roads where the main access points are located between 8:40am and 8:55am, there was 1 parking space available on Felmingham Road and on 3 spaces on Witham Road.

Similarly in the afternoon peak there were 97 free parking spaces between 1515-1530; again on the two main access point's road between 15:15 and 15:30 1 space was available on Felmingham Road and on 2 spaces on Witham Road.

A new pedestrian access will be provided at the south-west corner of the site. The new south-west pedestrian access will be located close to the new Reception and Year one block. The results of the surveys undertaken demonstrate that Warwick Road, Sheringham Road and Ashleigh Road, located close to the new pedestrian access, both have capacity to accommodate additional drop-off demand generated by the proposed development.

The provision of the new pedestrian access to the south-west of the site is expected to change the pattern of vehicle trips to the site for pupil drop-offs and pick-ups. The location of the new pedestrian entrance will encourage parents to park in areas currently being underutilised, such as Warwick Road, Sheringham Road and Ashleigh Road; thus spreading peak period drop-offs and pick-ups to a wider area and reducing congestion at the main entrances.

It is expected that the proposed development, through the provision of revised and new pedestrian accesses, the location of pupil drop-offs and pick-ups will be altered; contributing to reducing congestion through increasing the areas where pupil drop-offs and pick-up occur.

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

It is however likely there will be some congestion on Felmingham Road and Witham Road, this is due to parents wanting to drive as close as possible to the school entrance (during the morning drop off) sometimes double parking and creating congestion, despite available parking within walking distance of the school. Whilst this is acknowledged the Councils Highways Officer does not raise an objection to the proposal on these grounds.

It is proposed to update the school travel plan and a condition is recommended to this effect.

The NPPF makes it clear that proposals should only be refused on highways grounds where traffic impacts are severe. Third party comments regarding traffic congestion and parking issues experienced in surrounding streets have been duly considered. However, on balance it is not considered that there are sufficient grounds for refusing the application from a highways perspective.

Impact on neighbouring amenity

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

At present there are single storey buildings located close to the north and west boundaries of the site. These buildings will be demolished as part of the proposal. The existing school buildings already have windows facing onto neighbouring properties and gardens at a close proximity to the north, east and west. It is proposed to erect extensions on the north and west edges of the site at a slightly more generous distance from the boundaries than the existing single storey structures although it is recognised that the extensions will be erected closer to the boundaries than existing permanent buildings and will introduce a new relationship at first floor level.

A distance of 5m would be retained between the extensions on the northern part of the school facing the flank elevations of Nos.27 and 28 Suffield Road. A distance of 5-7m would be retained between the proposed western extension and the boundary with Nos. 27-47 Sheringham Road. It is recognised that the extensions would be located in fairly close proximity to the shared boundaries with residential dwellings. However, the existing buildings on site are already located close to shared boundaries and this site is constrained in terms of space available for additional accommodation and external amenity space. The resultant relationship is not unusual with schools located in densely populated residential areas such as this.

It is important to note that there are no windows in the flank elevations of Nos. 28 and 27 Suffield Road or 32 Felmingham Road although the school buildings face directly onto the rear gardens of these properties.

The western extension with roof top amenity space and MUGA would introduce a new relationship to the adjacent properties in Sheringham Road.

The extensions have been designed to minimise the impact on neighbouring properties as much as possible. The landscaping proposals incorporate planting along the western boundary which will help to protect privacy at ground floor level for occupiers of Sheringham Road. Whilst it is not possible to introduce tree planting along the northern boundary due to the limited space available the existing brick wall along the boundary will help to alleviate issues of overlooking/loss of privacy at ground floor level.

At first floor level a combination of high level windows, sandblasted regilt glazing and obscure panels will be used within the fenestration to minimise any direct overlooking or loss of privacy onto neighbouring properties to the north and west. Such details are shown on the plans submitted with the application and will limit any direct overlooking and loss of privacy from the upper floors of the school. It is not considered that the proposal would give rise to unacceptable loss of privacy or overlooking issues.

Acoustic screens have been specified for the roof top amenity spaces and MUGA comprising a 2.3m high Obscure glass barrier installed to the Western edge of the lower roof deck. A 1.8m high Obscure glass barrier installed to the Eastern edge of the lower roof deck. The barriers will be constructed from laminated glass with a density in excess of 10Kg/m² with no gaps present. The glass panels will be fixed to a structural support or frame and sealed with an appropriate acoustic sealant or gasket where necessary to avoid gaps.

For the MUGA a 3m high solid barrier made from trespa panels would be installed on the Western perimeter. The panels will be installed with overlapping joints and fully sealed to avoid gaps. The barrier will have a density of at least 10Kg/m². The barrier will be sealed at the base of the MUGA with a suitable compressible strip. A 1.5m high solid barrier will be installed behind the trespa panels along the Southern and Eastern edges. The barrier will be of at least 10 Kg/m² with overlapping joints and sealed at the base with a suitable compressible strip. A

1.2m high double weld mesh fence installed around the entire internal perimeter of the MUGA to reduce impact noise.

The acoustic screens are considered to be essential to prevent significant harm arising in respect of noise and overlooking/loss of privacy. Therefore a detailed condition to control implementation of the screens is recommended below.

Whilst the development will introduce additional built form close to the neighbouring boundaries it is not considered that it would be of scale that would be overbearing when viewed from neighbouring properties and gardens. The bulk and mass has been reduced through the use of setbacks and an innovative approach to the architectural treatment which will help to reduce the negative impact of the development when viewed from neighbouring properties.

Concerns have been raised in respect of the impact on house prices but this is not a planning consideration.

The application was supported by a Daylight/Sunlight Assessment as discussed above. The report concludes that there will be a minor impact on three properties (26, 27 and 28 Suffield Road). Officers accept that using the BRE Guidance the impact on daylight and sunlight would be minor but the applicant was asked to try and further reduce any harm in this respect if possible. In response to this request they submitted the following additional statement:

"The design team have worked alongside the London Borough of Bromley planning team through a pre-app process prior to submission of the application. During this process the mass of the proposal was examined and resulted in the design team making significant alterations to reduce this. At first floor level the proposed building line was pulled around 2m further away from the boundary and resulted in the loss of 1st floor access between classrooms either side of the hall spaces. A pitched roof with the eaves dropped as low as possible over stairwells was introduced in place of vertical parapets previously proposed. This resulted in a reduction in size of roof deck which the school saw as a critical requirement to provide external space on an otherwise constrained site.

These changes were developed into the proposal brought forward and submitted. The design team have examined whether further design changes could be made to reduce the mass to see if the GIA report could be produced with no minor items. However, this would require the proposal being cut back by approximately 5m at first floor level. This is not achievable if the school is to expand to 3FE and would require a redistribution of spaces elsewhere on the site which given the compact nature of the site this would result in the potential loss of outside space and is not considered feasible.

The proposal has been designed to meet BB103 requirements for minimum space standards in schools and any reduction in floor area would be detrimental to the standard of educational facilities, fall below the minimum guidance for classroom areas and restrict the ability of the school to expand to 3FE which is required by the local authority to meet the rising demand for pupil places in the area.

As there are no primary amenity spaces to neighbouring properties which fall below BRE guidance for hours in sun (overshadowing) and no rooms within neighbouring properties which fall below the levels of daylight (NSL) within the BRE guidance, the design team believe that the proposal has been designed with the mass reduced and cut back as much as possible to respect the neighbouring properties and as GIA concludes "performs very well in terms of daylight, sunlight and overshadowing".

Officers conclude with the applicant's assessment that the level of harm that may arise in this respect is minor and on balance do not consider that any harm that could arise would be significant enough to warrant refusal of this application. It is important to recognise that the properties in question already fall below recommended BRE guidelines. On balance the impact on daylight/sunlight is considered to be acceptable.

It is important to note that the application does not include any flood lighting for the MUGA . It is not considered appropriate to allow the MUGA to be used outside of normal daytime hours. Therefore it is appropriate to attach a condition preventing use of the MUGA after 18:00 on any day. If flood lighting is sought in the future this would require a separate planning permission which would be assessed on its own merits and may not be granted.

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

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

Concerns regarding dust pollution have been duly considered and can be addressed through the use of conditions recommend below.

The concerns raised by neighbours in respect of the impact on their amenity by way of overlooking, loss of privacy, noise and disturbance have been duly considered in the balanced assessment of this application.

Taking all of the above into account it is considered that whilst there will be additional activity relating from the intensification of this school site and this will have an effect in terms of both traffic and noise generated from use of the external amenity and sports facilities; and the proposal will have an impact in terms of daylight/sunlight to 3 properties, on balance the level of harm that may arise would not be so significant as to warrant refusal of this application. There will be a noticeable impact on amenity but on balance the wider public benefits of the proposal are considered to outweigh the harm that could arise with sufficient mitigation in place.

Sustainability

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

The applicants Energy Strategy has been prepared in accordance with London Plan Policy. It is proposed to meet the 35% carbon reduction by a combination of energy efficiency measures and roof-mounted PV panels. This is an appropriate approach for school extensions.

Other Considerations

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

Planning Obligations

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

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

Paragraph 122 of the Community Infrastructure Levy Regulations (April 2010) puts the above three tests on a statutory basis. From 5th April 2015, the Council will

need to link Education, Health and similar proposals to specific projects in the Borough.

In this instance, given the nature and scale of the development no obligations are considered to be necessary.

Environmental Impact Assessment

The proposal would be classified as an Urban Development Project within the Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2015. The Regulations set a threshold for Schedule 2 development (requiring EIA Screening) of sites which are more than 1 hectare. This site has a site area of 00.78 ha and therefore falls below the threshold for EIA Screening.

Summary

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

As discussed in this report the redevelopment of this site in the nature proposed is considered to be a suitable form of development. The proposal would provide additional education facilities for the borough on an existing education site which meets the aims and objectives of national, regional and local policy.

It is considered that the transport impacts arising would not be severe and could be adequately mitigated through the use of a travel plan.

Whilst there could be an impact on amenity by way of additional activity, noise and a minor change in daylight/sunlight conditions for 3 properties subject to appropriate mitigation it is not considered that the level of harm that could arise would be significant enough to warrant refusal of this application.

Officers consider that on balance, with the recommended mitigation and planning conditions in place the benefits of the proposal would outweigh any harm that may arise. Consequently it is considered that the proposal is acceptable subject to recommended conditions.

Background papers referred to during the production of this report comprise all correspondence on file ref 15/02597, excluding exempt information.

RECOMMENDATION: PERMISSION Subject to the following conditions:

Subject to the following conditions:

- 1 The development to which this permission relates must be begun not later than the expiration of 3 years, beginning with the date of this decision notice.

Reason: Section 91, Town and Country Planning Act 1990.

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

Plan Nos. 26052/101; 26052/102; 26052/103; 26052/104; 26052/105; 26052/106; 26052/108; 26052/107; 26052/109; 26052_110; 26052_112; 26052_113; Design and Access Statement, Daylight and Sunlight Report, Transport Assessment, Energy Assessment, Phase 1 Ecological Habitat Survey Report, Noise Impact Assessment, Planning Statement and Flood Risk Assessment submitted 15 June 2015;

Plan No. 26052/111 Rev A; Outline landscape Design Proposals - Stage C - Rev A submitted 21 July 2015;

IA-384-LD-P01; IA-384-LP-P01, IA-384-LP-P01, Traffic Consultants Technical Note submitted 22 July 2015;

Arboricultural Impact Assessment submitted 23 July 2015 and Daylight and Sunlight Addendum submitted 24 July 2015

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

- 3** Prior to the commencement of development hereby approved a demolition and construction noise and dust management plan shall be submitted to the Local Planning Authority for approval prior to the works commencing. Once approved the plan shall be implemented in full for the duration of works.

Reason: In order to protect residential amenity and to comply with Policy BE1 of the Unitary Development Plan

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

a) The contaminated land assessment shall include a desk study to be submitted to the Local Planning Authority for approval in writing. The desk study shall detail the history of the sites uses and propose a site investigation strategy based on the relevant information discovered by the desk study. The strategy shall be approved in writing by the Local Planning Authority prior to investigations commencing on site.

b) The site investigation, including relevant soil, soil gas, surface water and groundwater sampling shall be approved in writing by the Local Planning Authority.

c) A site investigation report detailing all investigative works and sampling on site, together with the results of analysis, risk assessment to any receptors, a proposed remediation strategy and a quality assurance scheme regarding implementation of remedial works, and no remediation works shall commence on site prior to approval of these matters in writing by the Authority. The works shall be of such a nature so as to render harmless the identified contamination given the proposed end-use of the site and surrounding environment.

d) The approved remediation works shall be carried out in full on site in accordance with the approved quality assurance scheme to demonstrate compliance with the proposed methodology and best practise guidance. If during any works contamination is encountered which has not previously been identified then the additional contamination shall be fully assessed and an appropriate remediation scheme submitted to the Authority for approval in writing by it or on its behalf.

e) Upon completion of the works, a closure report shall be submitted to and approved in writing by the Authority. The closure report shall include details of the remediation works carried out, (including of waste materials removed from the site), the quality assurance certificates and details of post-remediation sampling.

f) The contaminated land assessment, site investigation (including report), remediation works and closure report shall all be carried out by contractor(s) approved in writing by the Local Planning Authority.

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

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

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

(iii) If any potential for roosting bats or nesting birds is identified works to trees and hedgerows shall only be undertaken between the months of

November to February inclusive thus avoiding the potential to harm protected species.

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

6 (i) Notwithstanding the details set out within the Flood Risk Assessment submitted with this application the development hereby approved shall not commence until a surface water drainage scheme for the site based on sustainable drainage principles, and an assessment of the hydrological and hydro geological context of the development has been submitted to, and approved by, the Local Planning Authority. The surface water drainage strategy should seek to implement a SUDS hierarchy that achieves reductions in surface water run-off rates to Greenfield rates in line with the Preferred Standard of the Mayor's London Plan.

(ii) The development shall be implemented in full accordance with the details approved under Part (i) prior to any part of the extensions hereby approved being brought into use.

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

7 (i) Prior to commencement of development a revised landscaping strategy that reflects the details hereby approved together with additional tree planting on the southern boundary of the site and the inclusion of stag beetle loggeries shall be submitted to and approved in writing by the local planning authority.

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

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

8 (i) Construction works shall not begin until a Construction Logistics and Management Plan to manage all construction related vehicle movements to and from the site, identifying efficiency and sustainability measures to be undertaken during site construction of the development, measures of how construction traffic can access the site safely, how potential traffic conflict can be minimised, the route of construction traffic for arriving and

leaving the site and hours of operation has been submitted to approved in writing by the Local Planning Authority.

(ii) The development shall not be carried out otherwise than in accordance with the approved Construction Logistics and Management Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

Reason: To minimise the effect of the development on local air quality within an Air Quality Management Area and in the interests of reducing traffic and protecting amenity in line with Policies T5, T6, T7, T15, T16, T18 and BE1 of the UDP and Policy 7.14 of the London Plan.

- 9 The roof top Multi Use Games Area (MUGA), amenity space and running track hereby approved shall not be brought into use until all balustrading, boundary treatments and acoustic screens have been erected in full compliance with the details hereby approved and such features shall be retained and maintained in perpetuity.

For the avoidance of doubt the acoustic screens shall comprise:

Lower play deck

A 2.3m high Obscure glass barrier installed to the Western edge of the lower roof deck. A 1.8m high Obscure glass barrier installed to the Eastern edge of the lower roof deck. The barriers will be constructed from laminated glass with a density in excess of 10Kg/m² with no gaps present. The glass panels will be fixed to a structural support or frame and sealed with an appropriate acoustic sealant or gasket where necessary to avoid gaps.

MUGA

A 3m high solid barrier made from trespa panels or similar shall be installed on the Western perimeter. The external panels will be installed with 30mm gaps that are overlapped on the inside face with panels to provide a solid wall and fully sealed to avoid gaps. The barrier will have a density of at least 10Kg/m². The barrier will be sealed at the base of the MUGA with a suitable compressible strip.

A 1.5m high solid barrier will be installed behind the trespa panels along the Southern and Eastern edges. The barrier will be of at least 10 Kg/m² with overlapping joints and sealed at the base with a suitable compressible strip.

A 1.2m high double weld mesh fence installed around the entire internal perimeter of the MUGA to reduce impact noise.

A 1.5m high solid barrier will be installed behind the trespa panels along the Southern and Eastern edges. The barrier will be of at least 10 Kg/m² with overlapping joints and sealed at the base with a suitable compressible strip.

A 1.2m high double weld mesh fence will be installed around the entire internal perimeter of the MUGA to reduce impact noise.

Reason: In order to protect residential amenity and to comply with Policy BE1 of the Unitary Development Plan

10 The development hereby approved shall be carried out in strict accordance with the materials as set out within the Design and Access Statement submitted and approved as part of this application. Namely Blue Engineering Bricks with Charcoal Coloured Mortar; London Stock Bricks; Reglit Profiled Glass Panels (Opaque, Clear and Coloured); Dark Grey Polyester Powder Coated Aluminium Fenestration (RAL 7022); Dark Grey Polyester Powder Coated Aluminium Curtain Walling (RAL 7022); Dark Grey Polyester Powder Coated Aluminium Parapet Trims (RAL 7022); Zinc Standing Seam Roof and Rainwater Goods; PPC Aluminium Louvres (RAL 7022) and Green Trespa Panels.

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

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

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

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

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

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

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

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

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

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

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

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

15 (i) The development hereby approved shall include the provision of a minimum of 116 sqm of Photovoltaic Panels on the roof of the school buildings in addition to the implementation of all measures set out in the Energy Strategy hereby approved, in order to ensure that the school will achieve a minimum of 35% reduction in CO₂ below ADL2013.

(ii) Within 3 months of the first occupation of the new school buildings hereby approved evidence shall be submitted to the local planning authority to demonstrate that the photovoltaic panels have been installed.

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

16 At any time the combined noise level from fixed plant 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.

Reason: In order to protect residential amenity and to comply with Policy BE1 of the Unitary Development Plan

17 The Multi Use Games Area (MUGA) and roof top amenity spaces hereby approved shall only be used between the hours of 08:00 - 18:00 Monday to Friday inclusive.

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

18 The development hereby approved shall be undertaken in accordance with the proposed ground and finished floor levels as shown on Plan Nos. IA-384-LP-P01 and 26052/111 hereby approved.

Reason: In the interests of controlling the height of the development and protecting visual and residential amenity in accordance with Policy BE1 of the UDP (2006).

19 The development hereby approved does not include the provision of any floodlighting for the roof top amenity spaces or Multi Use Games Area. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (or any Order amending, revoking and re-enacting this Order), no floodlighting shall be provided within the curtilage of the school without the prior approval in writing of the Local Planning Authority.

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

You are further informed that :

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

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

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

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

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

- 4 The applicant is advised that the LLFA would expect a drainage proposal to meet the following criteria: - To demonstrate that opportunities to implement sustainable drainage techniques at the site have been maximised. - Surface water from the site should reflect greenfield run-off rate for the area of the site, typically 2 to 8l/s/ha. - The surface water attenuation system must be able to accommodate any storm event up to the critical duration 1 in 100 plus climate change storm event for the site without the flow balancing system being bypassed. Sufficient information must be provided to demonstrate that the critical duration has been used. - Management plan for future maintenance of all SUDS.