

**Application No: 15/00909/FULL1**

**Ward:  
Kelsey And Eden Park**

**Address : Harris Academy Beckenham, Manor Way,  
Beckenham BR3 3SJ**

**OS Grid Ref: E: 537430 N: 168596**

**Applicant : Kier Construction**

**Description of Development:**

Demolition of all buildings on site (except the basketball block) and erection of replacement buildings to accommodate a 3 storey 6FE Academy (8,112 sqm GIA) for 1,150 pupils and a 2 storey primary Academy (2,012 sqm GIA) for 420 pupils together with temporary classroom accommodation for a period of two years, provision of 97 car parking spaces, 170 cycle parking spaces, associated circulation and servicing space, multi-use games areas and landscaping

**Key Designations**

Biggin Hill Safeguarding Birds  
London City Airport Safeguarding  
Urban Open Space  
Within Manor Way Conservation Area  
PTAL 1a

**Proposal**

Harris Primary Beckenham was given permission by the Secretary of State for Education to open a 2FE primary school in September 2014, however following the refusal of an application for temporary accommodation on this site (14/01636) the opening of the school was deferred for a year to September 2015. The application for temporary primary school classes (14/01636) was allowed on appeal.

The current application is for the new primary Free School 2 Forms of Entry (2FE) and the re-provision of the existing secondary Academy (including 6th form) (6FE) and temporary secondary school provision to provide accommodation during construction of the secondary school.

The application proposes:-

- All buildings except the existing substation, store and basketball block will be demolished;
- Erection of a two storey 'T-Shape' primary school building (2,012 sqm GIA) positioned on an east-west axis within the northeast corner of the site. The building would measure 62m x 30m (largest points) with an overall height of 7.8m. There is a single storey element on the northern elevation which reduces the depth of the extension by 6m at first floor level. The building would be constructed of buff brick (Ibstock Brunswick Buff) with dark grey aluminium fenestration (Kawneer AA541 RAL 7016), opening vents with louvres and curtain walling (RAL 7016) and a flat roof. The roof would incorporate plant and PV panels with an overall height of 1.6m from roof level (9.4m from ground);
- Erection of a three storey rectangular secondary school building (8,112 sqm) positioned on a north-south axis towards the centre of the site. The building would measure 79m x 44m (largest points) with an overall height of 11m. There is a single storey element on the southern elevation which reduces the width of the extension by 12m at first and second floor level. The building would be constructed of the same

buff bricks on the ground floor level with external insulated white render (StoSilco Ltd) on the upper floors, dark grey aluminium fenestration, opening vents with louvres and curtain walling (RAL 7016). The roof would incorporate PVs, plant and rooflights. The plant would have a maximum height of 1.0m from roof level (12m from ground)

- Erection of temporary accommodation for the secondary school to be located adjacent to the basketball block behind the main school building. The double height accommodation would measure 21.6m x 42m x 5.1m high
- Erection of temporary single storey changing facilities also to be located behind the main school building measuring 9.6m x 18m
- Creation of 97 parking spaces (including 6 disabled) in front of the secondary school buildings of which 22 spaces will be dedicated for primary school staff and 75 spaces for the secondary school
- Provision of cycle and scooter stores
- Creation of a new Multi Use Games Area (MUGA) between the secondary school building and parking area in the southeast section of the site and a hardcourt area for the primary school to be located between the primary and secondary school buildings
- Improvements will be made to the pedestrian provision within the existing access road
- Implementation of hard and soft landscaping scheme to complement the new buildings, facilitate improvements to the existing access and create habitat areas
- Existing basketball courts (southern end of site) and grass pitches (western side of site) will be retained
- The new two form entry primary school building (at capacity) will accommodate 420 pupils and 48 members of staff (32 FTE).
- The new secondary school will enable the school to operate at its current approved capacity of 1150 pupils and 125 FTE members of staff (the existing school currently operates at 100 pupils and 100 FTE staff)
- The primary school (including pre and post school clubs) would operate 08:00 – 18:00 weekdays only
- The secondary school would offer its facilities to the local community (which already takes place within the existing school) so would operate 06:30 – 22:00 on weekdays and 09:00 – 16:00 on weekends

## **Phasing**

A phasing plan has been provided to show how the development would be constructed over a period of 2.5 years:

- Phase 1A (four months from start) – installation of temporary classrooms for the secondary school and contractors site accommodation
- Phase 1B (four months from start) – Install temporary classrooms for the primary school (as approved under the appeal decision for DC/14/01636)
- Phase 2 (6 months from start) – asbestos survey removal and demolition of buildings in the northern sections of the site (Enterprise Building/Small Sorts Block and DT Block)
- Phase 3 (months 2 – 14) – construct primary school building anticipated to be complete August 2016 and demolish secondary school buildings
- Phase 4 (months 4 – 24) – construct secondary school buildings anticipated to be complete April 2017 and remove temporary classroom facilities for the primary school
- Phase 5 (14 months from start) – hand over primary school and continue with construction of secondary school

- Phase 6 (months 24-30) – handover secondary school building, remove temporary secondary school classrooms and complete landscaping.

### **Timing of Submission**

The applicant has advised that initial proposals for redeveloping the site commenced in 2014. However, the original contractor appointed in early 2014 had to withdraw from the project for commercial reasons unrelated to the project, which meant the EFA had to repeat its procurement process to find an alternative contractor. Whilst this procurement process was taking place proposed temporary accommodation for the primary school was subject to a separate planning application. Kier were subsequently appointed as the new contractor and have been working with the EFA to bring the project forward. This is the reason for the delay in submitting a full planning application for the provision of a permanent primary school.

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

#### Acoustics Assessment and Addendum (prepared by RPS)

This report provides details of external noise levels, internal noise levels within the building and necessary sound insulation. Noise sensitive receptors have been identified (residential properties in Manor Way, Little Acre, Kelsey Way, Village Way and Stone Park Avenue). Two 7 day baseline noise surveys were undertaken. As a result of the surveys sound insulation of facades has been recommended and it is suggested that partially opening windows for natural ventilation is appropriate.

Potential noise levels arising from the external teaching areas has been assessed, the report concludes that external teaching areas should not be used for prolonged periods of time but some external teaching and use of the playground and fields for break times would not cause excessive loss of amenity.

The report recommends that a more detailed plant noise assessment is undertaken once the detailed specification for plant and equipment is known and noise from mechanical services should be designed to be less than 5dB above the  $L_{A90}$  background noise. This could be controlled by condition.

The addendum was produced in response to the Council's Environmental Health Officers request for additional information in respect of the impact of additional onsite vehicle movements arising from an intensification of the use. A quantitative approach has been taken to assess the increase in sound levels resulting from an increase in pupil numbers using the external spaces within the site. The assessment shows an increase in +2.1dB as a result of the secondary school operating at capacity and 420 pupils attending the primary school. This is not considered to be significant and would likely not be noticeable.

The report concludes that there would be no change in character or timing of the sound effects. The report further assesses the impact on noise arising from additional traffic movements. Again the report concludes that there would be no significant noise impacts arising.

#### Air Quality Assessment (prepared by Air Quality Assessments)

This site lies within an Air Quality Management Area but is not located on any through roads so air quality conditions at the site are shown to be better than air quality neutral. The document considers the air quality impacts associated with the development in construction and operational phases. Existing air quality conditions have been identified. The potential dust impacts arising throughout construction have been assessed (traffic and construction related activity). The report concludes that mitigation such as a dust management scheme will be required but subject to appropriate measures being put in place the impacts during construction will not be significant. The report considers the potential for operational impacts (traffic and boiler plant) but concludes that there is no requirement to mitigate operational

traffic impacts due the number if vehicle movements anticipated. It is necessary to ensure that any boilers on the site comply with GLA standards and thus emit less than 40mg NOx/kWh.

Dust management measures are addressed in the Construction Management Plan and Dust Management Plan.

#### Arboricultural Method Statement (prepared by RPS)

This report includes details of the tree survey undertaken in order to inform the preparation of the arboricultural implications assessment and method statement.

There are a number of trees on the site located in areas of open space, verges and along the site boundaries. A large number of the trees on site will not be affected by the development as they are located on the north, west and southern boundaries far enough away from the development not to be affected. The majority of trees along the existing access route and boundary with Manor Way will be retained although a total of 26 trees and 4 groups need to be removed to facilitate the development. Some tree pruning works will be required.

The report suggests that the demolition of the existing school buildings will require a detailed method statement of demolition works indicating what precautions will be taken to prevent damage to retained trees. The construction process will need to be monitored and the Arboricultural Method Statement used to provide guidance. Tree protection fencing will need to be erected and necessary pruning works sensitively carried out.

#### Construction Management Plan (prepared by Kier)

This document confirms that all site vehicular access will be via Manor Way with traffic directed to arrive from the north only to avoid the traffic island outside of the site. Regular stakeholder meetings will be held to communicate and share programme of works, methods, specific tasks and opportunities to address any concerns raised. There will be a direct link between the Senior Project Team and local residents. Limited onsite parking for contractor and visitors will be provided and will be managed via a permit system. Car share and use of public transport will be promoted and active management of parking outside the site will be undertaken to ensure that this does cause problems with respect to parking across residents drives or within close proximity of the school entrance. Deliveries will be assigned time slots to avoid peak drop off and pickup times for the school. Use of articulated vehicles will be minimized.

Construction materials and plant will be stored within safe areas inside the site boundary and cleaned before being taken of site. Appropriate site hoardings and heras fencing will be installed to ensure the site is safe and access will be strictly controlled.

Wheel wash facilities will be set up within the site boundary, in addition a local road sweeping company will be employed to maintain the surrounding roads and footpaths.

Kier will register with the Considerate Contractors Scheme. Dust and noise monitoring will take place and level will not exceed British Standards. All works will be undertaken in accordance with relevant HSE Regulations.

The Councils Highways Officer has confirmed that the Construction Management Plan is acceptable.

#### Design and Access Statement (prepared by Nicholas Hare Architects)

This report sets out the site context, constraints and opportunities. The report confirms that the existing buildings on site have a total footprint of 8,056 sqm, the proposal will significantly consolidate the building area footprint to 5,890 sqm maintaining a 20m zone free of development from most of the site boundaries (existing buildings adjacent to Little Acres will be retained within the 20m zone). On page 34 a comparison diagram shows that there would be an increase in hard sports facilities (increase of 4,247 sqm) and access and parking areas

(increase of 1,496 sqm) but a reduction in hard informal and social landscaped space and an increase in habitat areas and soft informal and social space. Altogether hard landscaped space and building footprint combined would increase by 2,463 sqm.

The report describes the internal layout of each of the buildings and approach taken in terms of massing and architectural treatment.

The report includes a landscape masterplan with details of the widened pedestrian route within the existing access road. Indicative details of boundary treatment have been provided.

The report confirms the access strategy for pedestrians, cyclists, vehicles and servicing. DDA compliant access will be provided throughout the buildings with controlled lift access for staff and pupils with restricted mobility. Appropriate means of escape will be provided.

#### Dust Management Plan (prepared by Kier)

This document is intended to supplement the air quality assessment. The document has taken account of the GLA SPG 'The Control of Dust and Emissions during Construction and Demolition'. Potential sources of dust generating activity have been identified as well as management procedures.

The document has been reviewed by the Council's Environmental Health Officer and confirmed to be satisfactory.

#### Drainage Impact Assessment (prepared by Campbell Reith)

This report confirms that the site lies within Flood Zone 1 (low risk). The surface water run-off rates from the existing and proposed developments have been assessed, with the maximum proposed surface water run-off rates being 50% of the existing. Calculations show that even with a 50% reduction, the proposed surface after run-off rate is too high for the existing sewer capacity. Consequently there are requirements for attenuation in the site. Foul water discharge will be via the existing foul sewers on site which discharge the local public sewer in Manor Way.

#### Energy Strategies x 2 (one for the primary school and one for the secondary school) (prepared by Van Zyl & De Villiers Ltd)

The reports include a baseline energy demand assessment and details of measures that will be incorporated to reduce energy demand and CO<sub>2</sub> emissions. The reports confirm that for both buildings measures taken to reduce energy consumption and carbon emissions will include limiting heat loss through the fabric of the building, avoiding thermal bridging, maximizing natural daylight and ventilation, reducing air permeability, utilizing dimming controls linked to daylight sensors, local light switching, movement and absence sensors for lighting, low energy light fittings, heat recovery mechanical ventilation, low specific fan power and heating controls to optimize plant efficiency. Various low and zero carbon technologies were considered but only PV panels were deemed to be suitable for the development.

It is proposed to explore the use of PVs during the detailed design to achieve 41,971kWh/annum which will bring a total of 24% reduction in CO<sub>2</sub> for the secondary school and 17,526kWh/annum which will bring a total of 35.2% reduction in CO<sub>2</sub> for the primary school building.

#### Energy Statement Response to LBL Comments on Energy Strategy (prepared by TP Bennett)

This document was submitted in response to Officers concerns with the Energy Strategy in terms of its content and overall carbon reduction for the secondary school building. The response seeks to justify the approach taken in the Energy Strategy by referring to other schemes within the borough. The applicant is of the view that the strategy meets policy requirements and the proposed measures to reduce energy consumption and CO<sub>2</sub> are appropriate for this education site. The document confirms that the primary academy would achieve a carbon reduction of 35.2% and the secondary school a carbon reduction of 24.3%.

The primary school reduction would comply with London Plan policy but the secondary school would fall below London Plan requirements.

#### Phase 1 Preliminary Risk Assessment and Phase 2 Environmental and Geotechnical Site Investigation Report (prepared by RPS)

The report confirms that no potential sources of current ongoing contamination associated with the site or surrounding area have been identified. An unexploded ordnance report indicates that a heavy anti aircraft battery was present on site during the Second World War, which may represent an historical source of hydrocarbon, metal and asbestos contamination. Four small potentially backfield pond were noted on site which may represent a source of Made Ground. Two tanks potentially containing fuel associated with the historical maternity hospital located to the southwest of the site were also noted. Sampling was undertaken and the report confirms the potential risk posed by on site contaminants of concern to human health receptors is low, potential risk of hydrocarbon compounds is low and risk to surface water receptors and ground gas is also considered to be low.

#### Planning and Heritage Statement (prepared by TP Bennett)

This statement sets out the site description, planning history, assessment of the proposed development against relevant planning policy and the heritage implications. The applicant considers that the proposal would meet an identified educational need, would not unduly harm the openness of the site, would not have an unacceptable impact on neighbouring amenity, is of an appropriate design which would preserve the character and appearance of the conservation area and would not give rise to a significant detrimental impact on the highway and therefore the proposal is considered to be in accordance with relevant development plan policies.

#### Statement of Community Involvement (prepared by TP Bennett)

The report states that public consultation was undertaken in respect of the proposal for the replacement secondary school and new primary school. A public consultation exercise was undertaken in January 2014 but the project stalled due to issues with a contractor. As part of the application for temporary primary school facilities a leaflet drop was carried out in December 2014 notifying residents of the intention to re-consult in the New Year on the permanent primary school proposal. A further consultation event was held over 2 days in January 2015. The SCI confirms that 61 people signed the attendance register for the consultation event that took place in January and 50 questionnaires were completed. Some comments from the questionnaire have been included in the document.

#### Transport Assessment (prepared by RPS)

This assessment covers existing site conditions, trip generation, distribution and development impact and necessary mitigation. The report confirms that the sole access to the site would be via Manor Way, parents will not be allowed to drive into the school but will need to make drop-offs and pick-ups on the local highway network which is the same arrangement as the school currently operating on site. The school gate will remain locked with a member of staff supervising pick-up and drop-off on Manor Way. The nearest bus stops are located on Stone Park Avenue (370m walking distance from the site) which serves bus 352 running at a frequency of every 20 mins. Beckenham Junction Tram and Overground Rail are also located within walking distance of the site.

The report identifies 18 traffic accidents in the vicinity (500m) of the site over the past 5 years of which 15 have been slight and 3 serious with no fatal. One accident involved a child walking to school, this took place in Village Way. No accidents were recorded in Manor Way, the junction with Stone Park Avenue or Kelsey Way.

Manual Classified Turning Counts and parking beat surveys were undertaken on the local highway network during periods where pupils were expected to arrive and depart at the school. In addition staff travel surveys were undertaken for the existing school.

The report confirms that in response to a request by Council Officers to provide drop-off facilities for primary school pupils within the grounds this issue was investigated. However, the applicant has serious concerns about the potential safety impact of parents driving into the school grounds in an area which will be utilized by 420 primary aged children, 1150 secondary aged pupils and staff. The report also considers the request made to open up other pedestrian access points into the site but these have been discounted for the following reasons:

Kelsey Lane – There are advantages to attempting to dissipate the access to the two school sites across the surrounding network in order to minimize demand at one location. However, the access at Kelsey Lane via the small track raises concern in respect of restricted pedestrian access and the impact of having additional vehicle movements in Stone Park Avenue and Kelsey Way. It is considered that parents accompanying their children along the track and across the school field would increase dwell times which could have a worse impact on the highway network than drop-offs in Manor Way.

Stone Park Avenue – pedestrian access to Kelsey Lane can be gained from Stone Park Avenue. However, use of this access would encourage parents to drop-off in Stone Park Avenue which is a key road and bus route. This could cause more congestion.

The report concludes that Manor Way is the only viable option for pedestrian and vehicular access. In terms of trip generation the report concludes that the secondary school will not result in any additional pupils above the current authorized capacity and the trip generation from the primary school could be accommodated on the road network. The report suggests that queueing in Manor Way (north) approach to the junction will occur but will not result in severe driver delay. It is considered that sufficient capacity exists in terms of car parking on local roads to accommodate drop-off and pick up parking demands.

In terms of mitigation the report proposes a travel plan, improvements to the pedestrian route from Manor Way, coordinated service movements for both schools and controlled construction traffic.

The Councils Highways Officer has assessed the Transport Assessment and his conclusions are set out in the main body of this report.

#### Additional Technical Note: Junction Impact Review (prepared by RPS)

This note was submitted in response to questions raised by the Councils Highways Officer after assessment of the TA. The note considers further the impact of the proposal on the Manor Way/Stone Park Avenue junction. The note confirms that the junction will operate within capacity but there will be short term increases in queues on Manor Way. Short term impact is defined as 30 minute periods during the peak start and finish hours of the school day during term time only.

#### Travel Plan documents x 2 for the primary and secondary schools (prepared by Harris Federation)

A travel plan has been prepared for each of the schools. The documents set out details of the school operation, admissions policies, opening hours, location public transport links, academy ethos and sustainable travel plan, objectives and an action plan.

The plans have been reviewed by the Councils Travel Plan Coordinator who has confirmed that they do not contain sufficient detail at this at this stage so it is appropriate to attach a condition requiring further submissions.

#### Updated Ecological Appraisal (prepared by RPS)

The report confirms that an ecological appraisal of the site was undertaken in February 2015. There are 2 statutorily designated sites within 2km of the site and 9 non statutorily designated sites within 2km of the site. As a result of the survey it was concluded that the site has low biodiversity value and is not a recognized nature conservation site although the surrounding hedgerow and trees, mature trees and nature area have some local value. Conserving these

features would ensure that the invertebrate diversity on the site would remain undisturbed and feeding for roosting bats and hedgehogs would not be affected. On the assumption that great crested newt and reptiles might be present in the nature reserve area care should be taken to avoid disturbance to this area and its environs during demolition and construction phase. The report suggests that the three buildings and two trees identified as having potential to contain bat roosts will require further surveys to determine if bats are present before they are demolished or felled. The report further suggests that if any trees or other features likely to support breeding birds are to be removed during the breeding season necessary measures should be undertaken.

Measures to enhance ecology could be included in the detailed landscape strategy such as bird and bat boxes, use of dead wood to create habitat for invertebrates, amphibians and reptiles, inclusion of wildflower species and simple and inexpensive management of the existing pond. The report recommends a ratio of >3 boxes per tree being felled which would equate to a total of 78 bat boxes on the site.

### **Location**

Harris Beckenham School is located on the west side of Manor Way, the school and its grounds are designated as Urban Open Space. The existing school currently comprises an arrangement of 1-3 storey buildings with associated sports facilities, areas of hard standing and parking. The school site is accessed via a short road leading from Manor Way to the east. This existing access will be utilised by staff and pupils as part of the redevelopment .

The school site is bounded on all sides by residential properties in Kelsey Road, Kelsey Way, Village Way, Manor Way and Stone Park Avenue. Southwest of the site is Ralph Perring Court, a two/three storey development for elderly residents. The area is primarily residential in character. Beyond properties in Manor Way opposite the school is Kelsey Park. There are entrances to the Park in Manor Way and Stone Park Avenue. There are no restricted parking measures in place at this point along Manor Way.

### **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. Following the submission of additional information a re-consultation was undertaken.

Representations have been received from third parties both supporting and objecting to the proposal.

At the time of writing 102 letters of objection had been received. The following issues have been raised in respect of objections

- If the MUGA were to be moved to the rear (west) of the secondary school building this would greatly reduce its impact
- The car park could be moved to the north of the secondary school building (where the primary school is proposed) which would greatly reduce its impact
- This road is already heavily congested and this proposal will make the situation worse
- Increased parking problems for Manor Way
- There have been recent road traffic accidents involving the school
- The school doesn't police children coming and going at the moment so this situation will be made worse
- The existing access is insufficient for construction vehicles
- The existing access is not fit of purpose and cannot accommodate an intensified use
- A 3 storey building will be visible from the road and harmful to the conservation area
- There will be disruption to wildlife and trees
- There is no requirement for additional education facilities in this locality
- It is not local children using this school, the majority arrive by car
- Pupils access to green space and playing fields will be reduced
- The quality of life for pupils will be reduced by overcrowding



- The information given with respect to works to trees in the submitted documents is inaccurate, more work will be required to facilitate the proposal
- This is an unjustified intensification of Urban Open Space as there is no education need in this Ward
- The applicant has refused to consider alternative pedestrian access
- The proposal will degrade the conservation area
- The new buildings will give rise to a loss of privacy for neighbouring gardens and houses
- The new buildings will have an adverse impact on light to neighbouring gardens
- Pupils and staff will be able to see into adjoining residential properties any CCTV would further harm neighbours privacy
- The proposed MUGA is now closer to residential dwellings this will lead to noise and light pollution
- The primary school will result in an increase in pupils (60%), this raises health and safety issues
- There are insufficient means of public transport in this area
- The access into the site is too dangerous for primary school children
- The PINS Inspector for the previous appeal confirmed that little weight had been given to education need. Now that Langley Primary School has been approved there is even less need for additional places in this area
- What sequential tests have been undertaken in respect of harm to the conservation area
- The Councils own evidence base for education need shows that there is only a need in Areas 5 & 6. Other areas have a surplus of places
- There has been no proper consultation between the Developer and residents
- Residents full support the views of KEPA
- If approved this development should include conditions requiring an additional access from Village Way, more car parking spaces, the gates for the vehicular access should be open at all times, a drop off area should be provided adjacent to the primary school, no access should be provided to the green roof
- The Statement of Community Involvement submitted by the applicant is flawed
- The proposal would result in a cramped form of overdevelopment
- The proposal represents a threat to the Urban Open Space
- The increase in pupil numbers and traffic will adversely affect the character of the conservation area, as this is a permanent proposal the harm will be significant and the proposal will permanently and unacceptable alter the character of the conservation area
- The Transport Assessment does not assess the impact of use of the MUGA during non-school hours but this facility is an all-weather pitch which could be used during evening, weekends and holidays.
- The parking stress surveys undertaken are insufficient
- In respect of the primary school the TA assumes that only 43% of pupils will arrive by car, this is a substantial underestimate
- No mitigation for noise pollution has been offered
- A previous application was refused for temporary additional facilities on the site. This was only allowed on appeal because the proposal was for a 5% increase in intensification, was for a temporary period and would not result in permanent impact and no after school clubs. This is completely different to the current proposal
- The Council could use s106 powers to enforce access from Kelsey Way
- The PTAL Rating of this site is very low (1a) so this site is not suitable for additional development as parents will have to drive to the school
- The only educational need is within Areas 5 and 6, other areas have a surplus as shown in the paper reported to the Education PDS Meeting in January 2015. Consequently the primary school is not needed in this area
- The revised information submitted does not address the concerns raised originally
- The new buildings will provide opportunities for overlooking and loss of privacy
- Removal of 26 trees is unacceptable, this will affect wildlife and neighbouring amenity

- The new footpath providing access behind the car park will be located close to residents boundaries causing noise and disturbance
- There will be dust pollution as a result of the construction

Peacock and Smith Planning Consultants submitted a letter of objection on behalf of Kelsey Estate Protection Area (KEPA)

The grounds of objection are summarised below (full comments can be viewed on the application file)

- There are serious shortcomings in the technical evidence which prevents third parties and the council understanding the application
- The acoustic assessment fails to address impact on the amenities of neighbouring residents resulting from increased intensity in use of the site (school buildings and MUGA)
- There are no times stated for use of the all weather pitch which means it could be used during the evenings and at weekends, this could generate noise and disturbance at sensitive times and the need for flood lighting
- The TA does not assess the impact of the site being used at evening, weekends and during holidays
- The parking surveys should have been undertaken in summer when Kelsey Park is used more intensively
- The assumption that 43% of pupils attending the primary school will arrive/leave by car is a substantial underestimate
- Additional information to address the points raised should be submitted
- The proposal will result in trees being felled
- The proposal introduces a new path close to neighbouring gardens which will cause harm to amenity
- There is no evidence that the Travel Plan will be implemented effectively

The applicant has submitted the following response to the objections raised:-

- Residents question the need for additional primary school places in this location, particularly as a further 2FE primary school has been approved for Langley Park within the same education Planning Area. As set out in the submitted Planning and Heritage Statement (section 6.2), the Harris Primary Academy proposal has already been taken into account in the Council's latest Primary School Development Plan reported to the Education Policy Development and Scrutiny Committee on 27 January 2015. In Planning Area 2 (Copers Cope, Kelsey and Eden Park wards) there will continue to be a shortage of Reception places for the foreseeable future even with Harris Primary Beckenham in place (see Planning Statement appendix 5). The proposed Langley Park school would assist in off-setting this deficit, as well as meeting needs from the adjoining Planning Area 1, though it is important to note that this school is not yet the subject of any planning application proposal. The Harris Primary Beckenham has already accepted admissions for its first year of intake (in temporary accommodation) from September 2015.
- The Inspector considering the appeal for temporary accommodation for the Primary School took account of educational need, noting both the LPA's acceptance of the need for additional school places in the Borough and the Education Care and Health Services' support for the application (Appeal Decision 28 January 2015, APP/G5180/A/14/2228314, para 22). He concluded that: "... there is an educational need that the scheme seeks to address and in this context I attach a moderate positive weight to that in the determination of this appeal"
- Residents suggest that the Transport Assessment underestimates the likely impact of the Primary School on local road conditions on the basis of the timing of the surveys undertaken and the basic assumptions about the proportion of primary pupils who will travel to school by car. The scope of the TA was agreed with the Council's highways officer, including the timing of parking beat and dwell time surveys, modal split for staff travel, assignment of journeys to the network and the basis of junction capacity assessments.

- A supplementary technical note was submitted. It is considered that on-street drop-off and pick-up is appropriate and can be accommodated within existing kerbside parking capacity and the existing access road is sufficient and acceptable, no potential alternative access points on Kelsey Way and Stone Park Avenue are suitable and junction capacity assessments are very much a “worst-case scenario” unlikely to be borne out in reality given the nature of the PICADY model and with many trips likely already to be on the network
- The design team has actively considered potential alternative access locations, as well as provision of on-site drop-off and pick-up, but none of these is practical, desirable or achievable. On-site drop-off would push the school buildings further into the site, impacting on its openness, and would create unnecessary turning movements into and out of the school access, and increase vehicular activity adjoining neighbours’ back gardens.
- The basis of the parking surveys and trip generation are the same as those used in assessing the transport impacts of the temporary accommodation for the Primary Academy. It is notable that the Council did not object to the transport impacts of that scheme which effectively introduced two out of the five additional year groups of the Primary Academy to the site (120 of the total 420 pupils). In relation to trip generation the Inspector concluded (para 13) that “this has been derived from mode share surveys undertaken at a number of primary schools in the borough and is thereby reasonably representative.” Furthermore, he emphasised that the impact of traffic “must be considered in the context of the prevailing situation” (para 12) which also involves activity during constrained times (para 13). That prevailing situation also involves parking associated with visits to Kelsey Park, though this unsurprisingly tends to be concentrated around the entrance to the park 260m further north up Manor Way and at the other main entrances on Stone Park Avenue, Wickham Way and at the junction of Court Downs Road and Manor Way.
- School Travel Plans for both the Secondary and Primary Academies will help mitigate potential impacts through a combination of pupil/parent education to avoid car use and on-site management and supervision at school arrival and departure times.
- KEPA suggest that the TA underestimates traffic impacts as it does not allow for out of hours or weekend/holiday use of the school’s facilities. This is to ignore the fact that the school facilities (hall, basketball block) are already in use by local sports and community groups and these trips are already on the network. It is further suggested that the “all-weather pitch” will attract many visits out of hours – but it is not an “all-weather pitch” but rather a multi-use games area (MUGA) for use only by the school.
- It is acknowledged that the proposals will involve an intensification of the site’s use. The pupil numbers would increase from the existing capacity of 1,150 to 1,570, an increase of 37%. The number of staff would rise from 90 to 137 (52%). Some 120 (40%) of the additional Primary Academy pupils will be accommodated initially in temporary accommodation and the Inspector who heard that appeal was satisfied that this increase was acceptable in terms of residential amenity (para 18). Again, he emphasised the fact that such impacts had to be considered in the context of the prevailing situation: “... an existing school grounds where general activity already exists,, ... not therefore a quiet location where such activity would be particularly obtrusive and out of keeping. The times when activity would occur would be in term-time and during the school day and therefore not at particularly sensitive times” (para 18).
- In this context, KEPA’s concerns about noise cannot be substantiated. An addendum to the acoustic assessment (submitted by letter of 27 April 2015) concluded that the increase in pupil numbers would result in an increase in sound levels of +2.1dB (from current conditions) or +1.4dB from the secondary academy’s current capacity. This is not significant and would not likely be noticeable especially given the site’s existing use as a school. In relation to traffic-related noise the sound level change is assessed as being negligible.
- Some residents have expressed concern about a new path running along the eastern part of the site. This was permitted (albeit in a straighter form) as part of the scheme for the Primary Academy temporary accommodation (see drawing no 666HABE-002 rev 3). In any case, the path is located at least 6m from the mature and robust boundary to the adjoining houses in Manor Way.
- The potential disturbance arising from the location and use of the MUGA has also been raised. As noted above, this is not an “all-weather pitch” that would be available for non-school use. Nor would it be floodlit. It is a hard-surfaced area that is available for the

school's use for physical education and informal play only. In developing the scheme design in a way that protects the site's openness (as set out in detail in the submitted Design and Access Statement), the replacement Secondary Academy buildings have necessarily pushed the MUGA a little further east from the position shown in a public exhibition in early 2014; but the distance to the site boundary remains at some 45m and the closest residential building in Manor Way is 78m away. In the context highlighted by the previous appeal Inspector of an existing school, this cannot be considered a material impact on residential amenity.

- The Primary Academy introduces a new 2-storey building into a part of the site that is largely open at present. This is an outcome of the contextual analysis of the site and the pre-application advice that pointed strongly to the desirability of encroaching on the open, western part of the site which is designated Urban Open Space. The new building would be sited behind 7-19 (odd) Kelsey Way and 1-4 (consec) Little Acre (though 1 and 2 Little Acre have an existing sports hall building close to their existing boundary which is to be demolished). As set out in para 6.5.4 of the submitted Planning and Heritage Statement and in the long section drawing (HABE-688-PL-005-00), the separation distances are substantial: 27m to the Kelsey Way rear boundary (62m to the houses themselves) and 20m (45m) to Little Acre; the latter represents an improvement on the existing situation (13m/33m). There is no case therefore that there would be any loss of light to rear gardens of these properties or indeed any adverse impact on privacy; there would be no need for the windows in the northern elevation of the school to be obscure glazed. There is no intention to install CCTV.
- It is notable that no representations on the applications have been received from the occupiers of the two properties adjoining the school access road at 76 Manor Way and 1 Little Acre. Nor have four of the residents in Kelsey Way who back onto the Primary School.
- As set out in the submitted Planning and Heritage Statement (sections 6.6 and 7), there are no public views of the application site from the adjoining Conservation Area. The only public view that includes both the application site and the Conservation Area is from Kelsey Lane to the west: it is a distant view and the application proposals would serve to provide a unified foreground to the glimpsed houses in the Conservation Area beyond.
- The Inspector considering the appeal on the temporary accommodation for the Primary Academy noted (para 12) that: "character as a concept is influenced by more than appearance and is also a function of use and activity."

#### The Beckenham Society

There is no objection to rebuilding the secondary school but the addition of the primary school would constitute over-development of the site and would be severely detrimental to the Manor Way Conservation Area. The use of the existing school access for the primary school is potentially dangerous and wholly inappropriate. The Council's own statistics show no shortfall of primary school places in this area. If a shortfall exists elsewhere in the borough the provision of additional school places should be within reasonable walking distance of the area with a shortfall. Primary school children have to be hand over within the school grounds which makes it inevitable that cars will either park in the road or attempt to drive up an unsuitable access. This will cause congestion and is unacceptable in the conservation area.

At the time of writing 145 letters of support had been received. The following issues have been raised in respect of support:

- The area is clearly in need of more school places
- Proposals for the primary and secondary schools would be positive
- This Academy is long overdue new facilities, the existing buildings are outdated and not fit for purpose
- Pupils in the temporary buildings deserve a permanent building
- Any adverse effects of construction will be temporary
- A new primary school on the same site as an existing secondary school will enable shared facilities
- This is a sustainable location for increased school facilities
- The transport statements shows that this proposal would not have a significant traffic impact

- Any harm to residents doesn't outweigh the benefits of the scheme
- There is a primary school crisis in Bromley with many schools having bulge classes
- A school has been in this location for years, expansion is needed and appropriate
- Temporary facilities for a primary school exist on this site, this is a material consideration
- When granting the appeal for temporary facilities the Inspector concluded that there is an educational need, the development would not adversely affect the conservation area and there would be no significant harm to neighbouring residents. He considered expansion to be sustainable.
- The proposals would provide much improved facilities
- The secondary school has a smaller footprint than the current buildings
- This is a really good school
- Permanent buildings are needed to ensure that children attending the temporary school can continue their education here
- The transport assessment submitted shows that any impact can be mitigated
- An alternative location for a primary school would be less sustainable, it makes sense for the two schools to share facilities
- There are primary aged children living within walking distance of this school that would benefit from this going ahead
- The Inspectors appeal decision on the temporary facilities is a material consideration. He concluded that the development would not adversely affect the conservation area, there would be no material harm to occupiers of surrounding properties and there is a general need for primary school places in the Borough.
- The Inspector also concluded that intensification of existing sites, provided it can be achieved without harm is a more sustainable approach than providing new school sites
- Existing children in this area need to travel to school in other parts of the Borough so there is a need for a new school here

A petition in supporting of the proposal was submitted (83 signatures)

Additional comments received will be reported verbally to the committee.

### **Comments from Consultees**

**Thames Water:** No objection subject to recommended Informatives

**Environment Agency:** No objection subject to recommended conditions

**APCA:** Accepting that this is a new school on an existing school site and despite the obvious increase in traffic the general principles are outside conservation area considerations.

**Drainage:** The submitted Drainage Impact Assessment carried by CampbellReith consulting engineers with Project No. 11866 dated February 2015 to provide 2 tanks to reduce surface water run-off to 45l/s for all events including the 1 in 100 plus 20% storm event is acceptable. The applicant is also considering the use of soakaways and that will be confirmed at the later stage, once soakage test is carried out to establish the suitability of the soil for infiltration. Please impose condition to comply with the submitted strategy.

**Highways (summary – full comments incorporated into the analysis below):** Although the school will have an impact on the junction and surrounding road network for a brief period; I am of the opinion the school will have a reduced impact than predicted within the Transport Assessment.

There is a need for the development to mitigate its impact by way of an s106 financial contribution. Due to the fact that the significant increase in pupil numbers on the site will give rise to an apparent increase in trip generation; there is a need to mitigate this impact of the development. The total cost of resurfacing Manor Way is £140,000 the proportion of the cost is attached to the development is £40,000 which is approximately less than a third of the total. Furthermore this road has been identified in Planned Highway Maintenance Programme 2015/16 report (dated

26/November/2014) as Priority 3 Highway maintenance location. This report recommends programmes of planned road and footway maintenance and provides schemes of work to be considered for future years. If minded to approve please secure the necessary s106 contribution and recommended conditions.

**Environmental Health (initial comments): Noise:** The report does not comment in depth on the possibility of noise from pupils affecting residential amenity and this has not been assessed. As this is a significant intensification of use there may be a noticeable increase in noise from children on break times etc., in particular if the primary school is also permitted. If this is a concern then the applicant should provide a further acoustic assessment to determine the current and likely future noise levels affecting surrounding residents, taking account of these sources. An assessment would allow the applicant to address this concern directly. Given the existing permitted use is as a school this may be considered acceptable. Reasonable internal noise levels in the proposed buildings can be achieved as outlined in the acoustic report. I do not agree with the proposed plant noise standards although as plant is currently unknown anyway this can be dealt with by of the recommended condition.

**Contamination:** The report finds low risk and further contamination measures are not considered necessary. Contamination issues should not be a bar to the proposed development however I would recommend an informative.

**Air Quality:** The air quality assessment finds that the impact of the development with appropriate mitigation will be insignificant although it highlights the potential for dust emission. The construction management plan does not go into detail on dust control and only states: *'Each construction activity will be risk assessed with regards to process and Kier procedures and where necessary proprietary equipment will be used to control activities where dust and debris may be produced during any activity.'* In order that we can see and approve measures to control dust, a condition is recommended.

I would also suggest a condition in respect of controlling the NOx emissions from gas boilers to minimise air quality impact within the AQMA.

**Lighting:** No floodlights or MUGA\sports pitch lights are proposed. It may be prudent to attach a condition for submission of details of access road car park and other lighting to prevent any impact on amenity.

**Environmental Health (final comments):** The additional information submitted in respect of noise, dust and air quality is acceptable. The recommended condition regarding plant noise should remain. The other aspects I am satisfied have been addressed and I would not object to the development.

**Cleansing:** No objection

**Design & Conservation:** The proposal site lies outside the Manor Way conservation area with only an access route from the conservation area. Therefore Policy BE13 for Development adjacent to a conservation area and BE11 are relevant. The most important views into and out of this conservation area are along Manor Way itself, and the gaps between the houses. Given how far this proposal is set back there will be no visual harm caused in this respect and indeed the proposed buildings are more attractive and rational than the current dated buildings on site. Any views of the development from back gardens would not in my view be harmful due to the large separation and screening.

In the appeal decision on 14/01636/FULL1 the inspector noted that the "function" of a site could be considered as a factor impacting upon the conservation area. However, the educational use on this site is an established part of the character of this area, although this proposal will add a primary school to the site. I note that there have not been any Highways objections in principle. Therefore I would expect that an increase in activity such as pedestrian or traffic movements within the conservation area could easily be handled and mitigated through the travel plan.

In conclusion I raise no conservation concerns and if minded to recommend permission I suggest that any boundary treatments are conditioned.

**Tree Officer:** Tree removals comprise the loss of 26 individual trees to facilitate the proposed scheme consisting 2 box elder, 2 mountain ash, 3 ash trees, 1 prunus, 1 maple, 1 oak tree , 1 field maple. 1 willow and 1 apple. Other trees are shown to be removed for arboricultural reasons distinct from the planning application proposal. The most significant of these are T83 Willow and T35 and T36 Ash of which are prominent within the site. The loss of T35 and T36 is required in order to upgrade internal vehicular access, with the removal of T83 required to enable the proposed building footprint for the new secondary school building and hardcourt area.

The loss of these trees is regrettable as they are high canopy and prominent when viewed from within the site, however on balance there is likely to be very little impact upon the streetscape, adjoining residential properties or local amenity, due to the presence of other existing trees close to the site boundaries, and I would therefore raise no objection subject to satisfactory mitigation.

The majority of trees are located mainly within the sites perimeter boundaries, and so unaffected by the proposal. Those trees which are within close proximity to the proposed construction are shown to be protected by way of ground protection, non-dig surface construction and fencing, based upon and in accordance with BS 5837: 2012 and described with Tree Protection Plan ref. JKK7990\_figure 04.01 and JKK7990\_figure 04.02. A new footpath is proposed to link the main pedestrian access and passing to the east of the upgraded parking arrangement. The line of the path will fall within and close to existing trees located within the protected areas adjacent to rear gardens within Manor Way. It is especially important that no-dig designs are implemented along this stretch of new hardstanding.

Tree losses based upon the above submitted details are in my opinion sustainable and can be mitigated. The remaining existing trees are to be retained in accordance with industry guidelines.

Subject to satisfactory drafting and implementation of Tree and Landscape condition I would recommend that no objection is raised.

**Education Services:** We would support application DC/15/00909 – Secondary and primary schools. This provides both the provision of new facilities for the secondary school replacing the current dilapidated buildings and sufficient accommodation for the primary school to operate as a 2FE school from reception through to year 6. Without the primary school being approved there will be insufficient primary school places in Beckenham in September 2016.

Although we would support the improvements to the secondary school set out in DC/15/00908 we are concerned about the implications of omitting the primary application for which there is a demonstrable need.

The GLA pupil planning projections demonstrate the need for Harris Beckenham Primary Academy.

The school is based in pupil place planning area 2 (Beckenham). Including Harris Beckenham there are currently 480 reception school places (September 2015) including the bulge class at Marian Vian School, this will reduce to 450 in subsequent years. The GLA projections indicate that demand for school places in planning area 2 will increase from 433 in 2015/16 to 443 in 2020/21. Based on the projections in planning area 6 including Harris Beckenham there would be 47 surplus places in 2015, falling to 7 surplus places in 2020/21. Without Harris Beckenham being able to provide 60 places we would have a deficit of 13 reception places in 2015/16 rising to 53 by 2020/21, the compound effect would be a shortfall of 233 primary places by 2021.

The Council has a policy to add 5% to GLA projections as part of its planning for school places to provide a contingency for changes in demand and to support diversity and choice. Including the

5%, without Harris Beckenham we would have a deficit of 35 reception places in pupil place planning area 3 in 2015/16 rising to 75 by 2020/21.

Without Harris Beckenham Primary Academy the local authority would not be able to meet its statutory requirement to provide sufficient local school places and every child an offer of a school place.

### **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  
BE11 Conservation Areas  
BE13 Development Adjacent to a Conservation Area  
G8 Urban Open Space  
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  
Policy 8.20 Urban Open Space  
Policy 8.36 Conservation Areas  
Policy 8.37 Development adjacent to a Conservation Area

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 site has been the subject of numerous previous applications in respect of extensions and alterations to the school buildings.

The most relevant of which is 14/01636/FULL1 for "*erection of 3 temporary buildings to provide primary school accommodation for 2 forms in 2014/15 and 2 forms in 2015/16 plus staff support, together with associated hardstanding and landscaping works and 2 car parking spaces*".

This application was refused by Planning Sub-Committee on 17<sup>th</sup> July 2014 for the following reason:

The proposed development would represent a cramped, over-intensive use of the site, giving rise to a detrimental impact on the character of the area, including the Manor Way Conservation Area, and on the amenities of nearby residential properties by way of increased traffic generation and parking pressure, not outweighed by local educational need, and thereby contrary to Policy BE1, BE13, C1, C7, T3 and T18 of the Unitary Development Plan.

The application was subsequently allowed on Appeal.

Whilst the appeal decision is a material planning consideration it is for an entirely different scale of development for a temporary period only, so will be given limited weight in the assessment of the current application. The fact that temporary facilities for the primary school are being provided does not mean that permanent facilities for 420 pupils will automatically be considered to be acceptable. This application will be assessed on its merits having regard to development plan policies and other material planning considerations such as third party representations.

**DC/14/04290:** Erection of 2 temporary buildings to provide primary school accommodation for 60 pupils plus staff until September 2016, together with associated hardstanding and landscaping works and 7 additional car parking spaces. Withdrawn by the Applicant after Appeal Granted for DC/14/01636.

### **Conclusions**

The main issues to be considered are:

- Principle and Educational Need
- Impact on designated Urban Open Space
- Design and impact on the Conservation Area
- Landscaping
- Impact on trees and ecology
- Highways impact
- Impact on neighbouring amenity
- Sustainability
- Planning Obligations

## Principle and Education 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

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

In this regard pre application meetings were held outlining the planning issues affecting the site, the emerging Local Plan and the timescales for the Development Control and Local Plan processes.

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. This will be further addressed at the end of this report.

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.

## Need for Primary School Places

The need for primary school places is set out in the Council's review of the Primary School Development Plan and the update of "Planning for Growth – Review of Secondary Education". These were reported to the Education Policy Development and Scrutiny Committee (EPDS 27th January 2015) and approved by the Portfolio Holder for Education 29th Jan 2015. The main points related to Primary School Places are set out below.

When considering the requirements suggested by the school projections it is important to note the scope for statistical variation due to wider factors, such as cross borough migration, and the changing development forecasts.

For the school year 2014 applicants for reception class places exceeded forecasts by some 225 places, requiring an additional 8 'bulge classes'. Given the accompanying increases in pressure for "in year" admissions across school ages this suggests families arriving in the Borough. The primary school on this site is shown in the Primary School Development Plan to address the forecast demand. The additional bulge classes (granted on Appeal) the bulges were necessary to deal with additional unforecast demand.

The Council's review of the Primary School Development Plan (PSDP) shows pressures across the whole Borough (excepting Biggin Hill and Darwin). The PSDP review, which this year includes expansions at a further 5 primary schools, indicates the extent of the proposals necessary to address the pressures. The proposals suggest 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, including Harris Shortlands, Harris Beckenham, La Fontaine, Crystal Palace Free School (all of which had approval from the Secretary of State for Education) and Langley Park Free School (which has subsequently been granted approval by the Secretary of State for Education)

The replacement secondary school is considered to be acceptable in principle as it would enable the existing school to reach its full capacity. It is considered that the need for additional primary school facilities has been demonstrated. Providing a primary school on this existing school site is considered to be appropriate as the proposal will not have a significant adverse impact on open space, trees, neighbouring amenity or highways. Furthermore the proposal would preserve the character and appearance of the conservation area.

## Impact on the designated Urban Open Space (UOS) and Trees

Adopted UDP Policy G8 permits built development in Urban Open Space where

- i. it is related to the existing use..., or
- ii. ...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 existing development on the site,

Where built development is involved the Council will weigh any benefits to the community such against a proposed loss of open space.

In all cases, the scale, siting, and size of the proposal should not unduly impair the open nature of the site"

The draft Urban Open Space Policy 8.20 amends the last clause (as shown below) to increase the flexibility for school expansions on Urban Open Space sites

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

The proposal is related to the existing use in that it will replace an existing secondary school on the site and expands the existing educational use of the site by including primary school provision. The proposed buildings would be located largely on the area of site already occupied by buildings, away from the main area of the UOS. The existing buildings on site have a total footprint of 8,056 sqm, the proposal will significantly consolidate the building area footprint to 5,890 sqm maintaining a 20m zone free of development from most of the site boundaries (existing buildings adjacent to Little Acres will be retained within the 20m zone). Based on the details provided in the Design and Access Statement, there would be an increase in hard sports facilities (increase of 4,247 sqm) and access and parking areas (increase of 1,496 sqm) but a reduction in hard informal and social landscaped space and an increase in habitat areas and soft informal and social space.

Altogether hard landscaped space and building footprint combined would increase by 2,463 sqm. However, it is important to note that building footprint would reduce and the increase would be associated with ground cover from the MUGA and parking areas. Whilst there would be more ground cover, consolidating the buildings would result in less visual clutter. Consequently the proposal will have less building coverage than the existing which will improve the sense of openness of the site. The new buildings are located further away from the most sensitive eastern boundary of the site whilst not encroaching into the western section of the site which comprises open space with soft landscaped sports pitches. It is considered that the adverse impact on the UOS would be limited.

The additional car parking spaces will be located within an existing parking area albeit with some minor encroachment onto an area of soft landscape. However, this would not adversely affect the open character of the site.

The existing and emerging policies relating to UOS support the provision of new education facilities on UOS unless there are demonstrable negative local impacts. In this instance it is considered that the proposed development meets the requirements of the UOS policy.

Policy NE7 requires proposals for new development to take particular account of existing trees on the site and on adjoining land. It is recognized that a number of trees and groups of trees will be removed as part of the proposal. However a large number of trees will still be retained and a strong green buffer would still be present around the site boundaries, which will soften the impact of the development from neighbouring properties as well as providing good visual amenity for the school and opportunities for ecology. The Councils Tree Officer has confirmed that the loss of trees is acceptable.

The majority of trees are located mainly within the sites perimeter boundaries, and so unaffected by the proposal. Those trees which are within close proximity to the proposed construction are shown to be protected by way of ground protection, non-dig surface construction and fencing, based upon and in accordance with BS 5837: 2012 and described with Tree Protection Plan ref. JKK7990\_figure 04.01 and JKK7990\_figure 04.02. A new footpath is proposed to link the main pedestrian access and passing to the east of the upgraded parking arrangement. The line of the path will fall within and close to existing trees located within the protected areas adjacent to rear gardens within Manor Way. It is especially important that no-dig designs are implemented along this stretch of new hardstanding.

A landscape masterplan has been provided as part of the Design and Access Statement. Whilst this is considered to be acceptable to show the landscape concept for the site, it is not of sufficient detail to prevent the requirement for a further landscape submission which will be controlled by way of a condition. The detailed landscaping submission must include details of boundary treatments and ecological enhancement measures.

### 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.

In this instance it is considered that appropriate surveys have been taken 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.

The habitat survey submitted suggests a range of mitigation to prevent adverse impact to Bats and to enhance ecology at the site. It is considered appropriate to secure suggested measures through the use of conditions.

### Design and impact on the Conservation Area

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 school site lies adjacent to the Manor Way Conservation Area (and part of the access route falls within the boundary of the Conservation Area). Consequently the proposal must be considered against Policy BE11 of the UDP in terms of impact upon the conservation area. This policy requires development proposals to preserve or enhance the character and setting of the conservation area.

The proposed buildings have been designed with a simple form and structure. The mass of the blocks is broken up and the facades articulated with uniform and well-proportioned fenestration. The set back on the first and second floor levels in the centre of the block and use of different external cladding material for the ground floor of the secondary school block helps to articulate the proportions of the building further breaking up the mass. The scale and form of the buildings is appropriate for this location.

The materials palette is limited to the use of brick, render and aluminium fenestration and detailing. The same brick, fenestration and detailing will be used on the primary and secondary buildings to create a visual connection between the two structures whilst the use of the render on the secondary building will add interest to the palette. Large scale bay studies have been provided to show how the design will be executed in detail to ensure that a good quality can be achieved through the use of 150mm rendered reveals, rendered soffits and drip details on the rendered sections, full brick reveals on the brick elements, return ends on cills, internal soil and vent pipes and a simple uncluttered approach to the facades. The submission of such details enables officers

to have confidence in the execution of the design and to secure design quality as an integral part of the permission. Material samples have been provided thus negating the need for any pre commencement conditions in respect of materials.

Officers initially raised concerns with the extensive use of white render for the secondary school building in terms of appearance, quality and longevity as this material is prone to staining and weathering which can result in a very poor appearance in a relatively short timeframe. When using render it is necessary to ensure that the building has been appropriately detailed to reduce the number of external pipes, vents and ad hoc apertures in the façade as these all contribute to staining of the render. It is also necessary to consider the location of the building as render is not a robust choice of material for heavily trafficked locations. In response to the concerns raised the applicant has confirmed the specific manufacturer for the render providing technical specification, has designed the building with internal soil and vent pipes and has reduced the need for external vents and ad hoc apertures in the façade consequently limiting the potential of excessive staining and has provided detailed bay studies and sections to show the build quality. This location is not heavily trafficked and as the buildings are set back into the site they will not suffer excessive pollution or weathering. On balance, in this specific location render is considered to be an appropriate material that will complement the remaining materials pallet.

Over all the design approach is simple but fit for purpose and will result in a good quality development.

The buildings will be visible from surrounding residential properties but not within the streetscene and will not be readily visible in the conservation area. Consequently there will be no impact in design terms on the character or appearance of the conservation area. Third party concerns have been raised in respect of the increase in traffic, parking and servicing and noise generated by the proposal, it is suggested that this will detract from the character of the conservation area. This has been duly considered but Officers are not of the opinion that the intensification of educational use at this site will detract from the character of the conservation area. The proposal is considered to preserve the character and appearance of the conservation area.

#### 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. Policy T2 requires the submission of Transport Assessments for development likely to be significant generators of travel and Policy T3 with Appendix II sets out adopted car parking standards which should be used as a basis for assessment.

The applicant has submitted a Transport Assessment (TA) which sets out details of the highway, traffic and parking implications of the scheme. A further technical note was submitted to demonstrate the impact of the development on junctions within the vicinity of the site.

#### Proposed Operation

The first academic year of the primary school would cater for 60 reception class age students across two classes and a total of 11 members of staff. The number of pupils and subsequently the number of staff will increase year on year, from the first academic year up to a maximum size of 420 students and 48 members of staff for the 2021/2022 academic year. The full time equivalent

members of staff will be 32. This will therefore result in the school providing two-form entry from reception class to year 6 when it reaches capacity.

It is recognised that as the proposed primary school will be sharing its site with Harris Academy Secondary School there is likely to be some interaction between the two facilities. This would be managed in order to ensure the safety, particularly of the younger primary school age pupils who would be in attendance at the new school. The secondary school caters for pupils between the ages of 11-18 and includes academic years of Year 7 through to Year 13; the school includes sixth form facilities on-site. The school currently has in the region of 1000 students in attendance, however the authorised capacity of the secondary school is 1150 and following redevelopment it is anticipated that this level will be reached.

The secondary school currently operates school hours of an 8:30am start for all pupils with them needing to be on site by 08:25am. On Mondays and Fridays all pupils finish at 2:50pm, while on Tuesdays to Thursdays Years 7 and 8 finish at 2:50pm, but Years 9 – 13 finishes at 3:40pm. The school also runs a breakfast club, which begins at 8:00am. Teachers generally leave between 4:30-6:00pm. The school does not permit parents to drop-off or collect their children from within the school site; instead they are expected to do this from the surrounding local road network. In order to enforce this a member of staff is currently located at the school gates at the start and end of the school day to ensure parents do not drive onto the site without a prior appointment and also to ensure that pupils leave the school site safely. To further enforce this, the gate at the entrance to the school is closed at 8:10 am, to prevent parents from driving onto / off of the site

The primary school will cater for Reception class through to Year 6. It is currently envisaged that the school day will begin at 08:55 and finish at 15:15. The proposed start and finish times have been staggered from those in operation at the secondary school in order to minimise the impact of trips to and from the site on the local highway and transport networks. Furthermore the Breakfast Club will operate between 08:00 -08:55 and after school activities will take place between 15:15-18:00. This will help to spread the peak of arrivals and departures to the school site further lessening its impact on the local network.

#### On-Street Parking Surveys of Local Highway Network

The school proposes, that in line with current arrangements for the secondary school, parents bringing their children to the Harris Primary Free School Beckenham should not enter the school site, but instead undertake to drop-off and pick-up their children from the surrounding road network. To establish the available parking capacity that exists on the local network at present parking beat surveys were undertaken on Tuesday 4th February 2014 in line with the Lambeth Methodology, the extent of the surveys were discussed and agreed with the Council's Highways Department. Such methodology indicates that people are willing to park a distance of 200 metres from their intended destinations, as such parking beat surveys have been undertaken on roads within a 200 metre walking distance of the school.

The surveys were subsequently updated on Friday 6th February 2015. This means that there are two sets of survey data to compare against in order to provide a robust indication of existing parking stress on the local highway network when pupils are arriving and leaving the school site. Furthermore as the 2015 survey data was undertaken on a Friday all existing secondary pupils started and ended the school day at the same time which provides an even further robust assessment of the impact the primary school may have on local parking stress.

The surveys show parking on the local network for the peak hours of 08:00-09:00 and 14:30-15:30. This corresponds with the surveys in 2015 undertaken on a Friday when all pupils begin the day at 08:30 and finish the day at 14:50. These two peak hours therefore represent when at present most demand for on street parking associated with parents dropping-off and picking-up their children from the school would occur. The 2015 survey analysis shows higher levels of existing parking demand, with average peak demand in the AM Peak period of 23% compared to 15% in 2014 and 32% in the PM Peak period compared to 28% in 2014.

## Comparative Dwell Time Surveys

The Council's Highways Department requested that dwell time surveys be undertaken at a comparable local primary school to determine the length of time parents spent parked on local roads while taking and collecting their children from school.

Surveys were undertaken at Harris Primary Academy, Benson on 4th February 2014. The dwell time surveys have indicated that during the morning peak hour the average dwell time for cars on the local network is just over 10 minutes while in the afternoon peak hours the average is almost double at approximately 20 minutes. This is often due to the fact that parents will arrive prior to the end of the school day to ensure they are ready for when their child leaves. Moreover parents are often more likely to undertake meetings with teachers or other parents at the end of the school day rather than the beginning. The average dwell times were recorded as 4 minutes and 8 seconds for the AM Peak and 16 minutes and 31 seconds for the PM Peak.

## Staff Travel to Work

The table below shows the modal splits from staff surveys undertaken for the existing secondary school.

Mode of Travel	Mode Share (%)
Walk	16%
Cycle	3%
Bus	3.3%
Rail	11.3%
Car Driver	58%
Car passenger	3%
Other	5.4%
Total	100%

The Primary School will be located on the same site; therefore the applicant assumed that staff travel patterns will be similar.

## Car Parking Arrangements

The Primary School is proposing to provide a total of 22 car parking spaces for the exclusive use of Primary School members of staff and visitors to the front of the school.

The new Secondary School building will have a total of 75 parking spaces provided alongside the facilities. The total number of staff employed at the new Secondary School will be 125. Applying the same car modal share of 58%, equates to a requirement of 73 spaces for members of staff. This means that there will be two parking spaces left over for the use of visitors. Four of the Secondary School parking spaces will be provided to disabled standards.

## School Drop-Off and Pick-Up Arrangements

Parents will not be able to drive into the school site to drop-off or collect their children. Pick-up and drop-offs will take place from the local road network, similar to existing arrangements for the secondary school.

The applicant was asked to consider the potential for on-site drop-off / pick-up arrangements for primary school pupils to be incorporated within the scheme. The applicant has investigated this and stated that there are significant concerns over the safety of mixing pupils and cars during drop-off and pick-up times. At a peak time there could be a total of 1,570 pupils on site and given the constrained nature of the site it would be inevitable that if drop-offs and pick-ups were to need to occur on site there would be a number of occasions where both pupils and drivers were looking to occupy the same space. For this reason the applicant has decided to adopt the same arrangements as the secondary school.



## School Access Arrangements

It is proposed that both schools will be accessed from the existing access point onto Manor Way. Improvements will be made to pedestrian provision on the access road into the site from Manor Way. The applicant has concluded that access to the school site via Kelsey Lane would not be an appropriate solution for the provision of access for pedestrians or vehicles as there is insufficient land available for the provision of a suitable vehicular and pedestrian access and it is anticipated that such a provision could have a detrimental impact on highway safety.

The existing school access via Manor Way provides for both pedestrians and vehicles and there is a pedestrian refuge island located immediately to the south of the access and adjacent to the bus stops located on Stone Park Avenue, assisting with the safe movement of children across this road. Also, all the school signage is already in place, therefore removing the requirement for any new off-site highway infrastructure to accommodate the new primary school. Furthermore, as the existing and proposed school buildings are located on the eastern side of the site, Manor Way provides the shortest route from the public highway to the school buildings, thereby minimising dwell times of parents undertaking drop-offs / pick-ups by car and therefore minimising any impacts on on-street car parking.

To utilise an alternative access would result in a longer walking distance for pupils to the school building and in turn would likely result in increased vehicle dwell times during school drop-off and pick-up periods aggravating impacts on the surrounding highway network. Therefore on balance Manor Way provides the viable means of vehicular / pedestrian access to the existing secondary school and proposed primary school.

## Trip Generation

In order to establish the proportion of pupils who would be likely to take part in additional activities beyond normal school operation, data was obtained from three of the Harris Federations existing primary schools in the local area namely; Crystal Palace, Kent House and Benson Primary Free Schools.

The average proportions of pupils using such facilities is presented in table below

	Crystal Palace	Kent House	Benson	Average
Total Number of Pupils	338	420	420	
Before / After School Club Average Attendance	29	36	16	7%

It's suggested that 7% of pupils are likely to use such facilities and therefore arrive and leave the school site outside of the peak hours of 08:00-09:00 and 15:00-16:00 respectively. Therefore in relation to the proposed school size of 420 pupils, 30 of these would travel outside the peak hours.

In order to establish the modal shares the remaining 390 pupils would use to travel to the school site during the peak hours, use has been made of school mode share surveys undertaken at a number of primary schools in Bromley.

Method of Travel	Mode Share	Total Trips
Walk	51%	199
Cycle / Scooter	2%	8
Car / Van	43%	168
Bus	4%	16
TOTAL	100%	390

The table shows that of the 390 pupils that would arrive and depart during the peak hours, the majority (51%) of pupils would be expected to walk to the school site. After this approximately 43%

of pupils would be expected to travel by car to school. Fewer than 25 pupils combined would be expected to either cycle/scooter or use public transport to travel.

#### Staff Trip Generation

In respect of the primary school, the modal split of the 48 members of staff travelling to the school site has been identified using data from the March 2014 surveys undertaken at Harris Academy Secondary School. This covers all staff employed at the site.

Mode of Travel	Staff Split	Mode	All Staff Trips (48 Staff)	FTE Staff Trips (32 Staff)
Walk	16%		8	5
Cycle	3%		1	1
Bus	3.3%		2	1
Rail	11.3%		5	4
Car Driver	58%		28	19
Car Passenger	3%		1	1
Other	5.4%		3	2
Total	100%		48	32

There would likely be a maximum of 32 FTE members of staff on site. Therefore the table shows that during these peak hours, 19 would be expected to travel to the school site by car and 1 by bicycle.

#### Trip Distribution and Development Impact

A junction capacity assessment has been undertaken on the local highway network in line with the request from the Council's Highways Department.

In the tables below **RFC** = Reserve Flow Capacity (usually below 0.85 means that the junction is operating satisfactory) **Q** = queue - indicates number of vehicles waiting at the junction.

#### Manor Way / Kelsey Way Priority Junction

Link	2014 Observed				2021 Baseline				2021 With Development			
	AM Peak 8:00- 9:00		PM Peak 15:00- 16:00		AM Peak 8:00- 9:00		PM Peak 15:00- 16:00		AM Peak 8:00- 9:00		PM Peak 15:00- 16:00	
	RFC	Q Veh	RFC	Q Veh	RFC	Q Veh	RFC	Q Veh	RFC	Q Veh	RFC	Q Veh
Manor Way (Right Turn)	0	0	0.01	0	0.0	0	0.0	0	0	0	0.0	0
Kelsey Way	0.04	0	0.04	0	0.0	0	0.0	0	0.0	0	0.0	0

The Manor Way / Kelsey Way Priority Junction – data indicates that the junction has enough capacity to cater for the additional traffic.

### Manor Way / School Access Priority Junction

Link	2014 Observed				2021 Baseline				2021 With Development			
	AM Peak 8:00- 9:00		PM Peak 15:00- 16:00		AM Peak 8:00- 9:00		PM Peak 15:00- 16:00		AM Peak 8:00- 9:00		PM Peak 15:00- 16:00	
	RFC	Q Veh	RFC	Q Veh	RF C	Q Veh	RF C	Q Veh	RF C	Q Veh	RF C	Q Veh
Manor Way (Right Turn)	0.01	0	0.0	0	0.0 1	0	0.0	0	0.0 3	0	0.0	0
Kelsey Way	0.01	0	0.02	0	0.0 1	0	0.0 3	0	0.0 1	0.	0.1 0	0

The above show that the Manor Way / School Access junction currently operates with spare capacity and would continue to do so when allowing for development.

### Manor Way / Stone Park Avenue Priority Junction

Link	2014 Observed				2021 Baseline				2021 With Development			
	AM Peak 8:00- 9:00		PM Peak 15:00- 16:00		AM Peak 8:00- 9:00		PM Peak 15:00- 16:00		AM Peak 8:00- 9:00		PM Peak 15:00- 16:00	
	RFC	Q Veh	RFC	Q Veh	RFC	Q Veh	RFC	Q Veh	RFC	Q Veh	RFC	Q Veh
Stone Park Ave East (Right Turn)	0.1 8	0	0.1 3	0	0.3 1	1	0.2 5	0	0.3 4	1	0.2 6	0
Manor Way (South)	0.0 2	0	0	0	0.0 3	0	0	0	0.0 3	0	0.0	0
Stone Park Ave West (Right Turn)	0	0	0	0	0	0	0	0	0	0	0	0
Manor Way (North)	0	0	0.2 5	0	0.6 7	2	0.5 9	1	1.3 0	25	1.0 9	15

In the 2021 baseline scenario the RFC on Manor Way North will increase significantly in both the morning and afternoon peak hours. The 2021 baseline scenario assumes that the secondary school is operating at capacity and therefore an additional 150 pupils will be travelling to the school site as well as 25 additional staff. The additional movements of parents to and from Manor Way gives rise to increased RFC's on Manor Way (North).

The result of additional development traffic associated with the new primary school will be increases in queuing on the Manor Way North arm only. This relates to 43% of 390 pupils being dropped off by their parents during the peak hour on Manor Way and 58% of 32 FTE members of staff arriving and departing the school site during peak hours.

During the AM Peak hour, PICADY (a computer software program package for designing and modelling priority junctions such as roundabouts and crossroads) shows that the RFC on the Manor Way North arm would only be above 1.0 for a half hour period between 08:15-08:45, whilst

outside of this period the RFC falls back to approximately 0.7, in line with the modelling shown for the 2021 Baseline peak period. Similarly during the PM Peak hour the RFC's on the arm are also only above 1.0 for a half hour period between 15:15 – 15:45, whereas outside of this period the RFC again reduces to similar levels experienced in the 2021 Baseline scenario peaks.

### Conclusions

The surveys have been prepared based on the assumption that all pupils at the primary school arrive between 08:00-09:00 and leave between 14:30-15:30 apart from 7% of students who would likely be taking part in before and after school activities. Furthermore the analysis assumes that all trips are new to the network and there will be no shared trips between primary and secondary school children. It also assumes that all pupils arriving / departing by car are travelling in separate vehicles.

Assessment Period	15 Minute Segment	Total On-Street Parking Available (Cars)	Maximum Existing Cars Parked	Total Parking Demand Primary School (168 Vehicles) and Residual Secondary School (65 Vehicles)	Average Dwell Time	Maximum Demand for spaces at any one time	Spaces Available	Parking Stress
8:00-9:00	8:00-8:15	233	46	233	10 mins 15 Secs	40	147	37%
	8:15-8:30	233	56	233	10 mins 15 Secs	40	137	41%
	08:30-08:45	23	53	233	10 mins 15 Secs	40	140	40%
	8:45-9:00	233	55	233	10 mins 15 Secs	40	138	41%
14:30-15:30	14:30-14:45	233	67	233	20 mins 14 Secs	79	87	63%
	14:45-15:00	233	79	233	20 mins 14 Secs	79	75	68%
	15:00-15:15	233	83	233	20 mins 14 Secs	79	71	69%
	15:15-15:30	233	64	233	20 mins 14 Secs	79	90	61%

The table shows that the on-street parking demand that is likely to be generated by parents escorting their children to and from the School and the shortfall in pupils currently at the secondary school, the parking stress as a maximum could increase to 41% during the morning peak hour and 69% for the afternoon peak, which accounts for the longer dwell times expected in the PM Peak. It can be concluded that there is sufficient on-street parking capacity to accommodate the primary school and the secondary school when operating at full capacity.

The combined operation of primary school and secondary school would have an impact on the junction of Manor Way / Stone Park Avenue. There will be increases in queuing along Manor Way compared to the baseline scenario; however, this impact is anticipated to last for a short period of time whilst pick-up and drop-off movements are occurring. Furthermore it does not impact on the operation of Stone Park Avenue which is a key corridor for east – west movements in the local area. Furthermore parking beat surveys have indicated that sufficient capacity exists on local roads to accommodate increased pick-up and drop-off trips.

The junction will operate within capacity in 2021 without the primary school provision; however, there would be short term increases in RFC and associated queues on Manor Way (north) following the introduction of the primary school. With the addition of the primary school and with the secondary school at maximum capacity, the RFC on Manor Way (north) will increase significantly in both the morning and afternoon peak hours. There would be an increase in RFC to 1.30 in the morning peak, and 1.09 in the school afternoon peak, with queues of 25 and 15 respectively, increasing from 2 and 1 without the school. It should be noted that there will be minimal or no increase in RFC or queues on any of the other arms.

The TA identified that the RFC was above 1.0 during a peak 30 minute period within the peak hours only, being 08.15 – 08.45 and 15.15 – 15.45. Outside of these two 30 minute periods per day, the junction operated within capacity. With regard to the afternoon peak, this is outside of the existing highway peak, and therefore some of the flows at this junction are considered to be associated with the Harris Academy, which finishes between 14.50 and 15.40 for various Year groups, rather than residents of Manor Way.

It should be noted whilst PICADY provides a good guide when comparing the relative impact of one set of flow scenarios to another, the impact it concludes when a junction is anticipated to operate above capacity is not a factual representation of how the junction would operate in reality. In particular queues increase exponentially in PICADY when the RFC goes above 1.0 and therefore the level of queuing the modelling results show would not be expected to be borne out to such an extent in reality.

It should also be noted that the assessments include for the provision of an additional 150 pupils and 25 staff that can be accommodated at the existing Harris Academy without any new planning permission, and therefore an element of the increase in RFC's / queues could be attributed to this increase.

It is however likely there will be some impact as the primary cause of congestion is parents wanting to drive as close as possible to the school entrance (during the morning drop off) some may double park and create congestion, regardless of available parking within walking distance of the school. When considering the distribution of pupils arriving / departing from the school, the assessment assumes that the route the parents take to / from the school on each trip is the same and is based on the nodal point catchment areas for the pupils. In reality, many of the parents will be travelling to other destinations once they have dropped their children at / picked their children up from school and therefore their access routes will vary. This could result in fewer trips travelling through the Manor Place Depot / Stone Park Avenue junction than currently predicted and / or with different directions of travel at the junction.

The School Travel Plan would be used and will evolve over the lifetime of the schools to promote and support a range of measures to encourage parents and their children to travel to the school site by sustainable means.

The trip generations assessments do not allow for car sharing by pupils, with all trips by car being considered as a single pupil trip. It is clear that the school will have a number of pupils that are siblings of other pupils at the school, and also potential siblings of pupils attending the Harris Academy. Previous experience with schools has demonstrated that up to 30% of pupils are siblings, and these are likely to car share to the school, reducing the number of trips. The assessment also does not include for car sharing arranged by parents for their children that live close to each other.

The primary school is proposing to provide a total of 22 car parking spaces and a minimum of five staff cycle parking spaces and 42 pupil scooter / cycle parking spaces. These will be monitored as part of the School Travel Plan to determine demand for their use and additional requirement if necessary. Similarly the Secondary School will increase its parking provision from 50 spaces to 75 spaces to ensure the needs of all staff can be accommodated on site.

Although the school will have an impact on the junction and surrounding road network for a brief period; the Council's Highways Officer is of the opinion the school will have a reduced impact than that predicted within the Transport Assessment. On balance, the proposal is considered to be acceptable from a highway perspective. However, due to the fact that the significant increase in pupil numbers on the site will give rise to an apparent increase in trip generation there is a need to mitigate this impact of the development by way of a financial contribution towards highway maintenance for Manor Way. The total cost of resurfacing Manor Way is £140,000 the proportion of the cost is attached to the development is £40000 which is approximately less than a third of the total. Furthermore this road has been identified in Planned Highway Maintenance Programme 2015/16 report (dated 26/November/2014) as Priority 3 Highway maintenance location. This report recommends programmes of planned road and footway maintenance and provides schemes of work to be considered for future years.

In summary the Council's Highways Officer is of the view that the proposal would have some impact in terms of traffic generation but this could be mitigated through the use of a Travel Plan and contribution towards highway improvements. It is not considered that a refusal on the ground of traffic generation or highways impact could be sustained. The NPPF clearly states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. In this instance the traffic impact of the scheme can be adequately mitigated in accordance with UDP Policy T2 and impact on parking is considered to be acceptable in accordance with Policy T3. Consequently the proposal is considered to be acceptable 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.

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. When considering the impact of the proposal in this respect it is necessary to acknowledge that a school already exists on this site, the existing school comprises substantial buildings, car parking located between the buildings and the properties in Manor Way, the same access route as currently proposed and extensive areas of hard and soft landscape. Consequently there is already a degree of noise and activity associated with the use of the this site in its current form whereby pupils and teachers have access to the site in its entirety including the ability to utilise soft landscaped areas up to the adjoining boundaries with neighbouring properties. It is therefore necessary to consider whether the proposal would give rise to an increase in noise, activity, overlooking and loss of privacy and whether that increase would amount to significant harm so as to warrant refusal of this application.

An important consideration is the relationship of the new development to neighbouring properties. Taking the closest measurements based on the nearest residential property to the shared boundaries, the new primary school would be located 24m from the boundary with Kelsey Way at its nearest point (single storey element) with the two storey element being located 30m from the boundary, there would be a distance of over 150m between the new school buildings and the boundary with properties in Village Way, 20m between the primary school and Nos.1-4 Little Acre, the new secondary school would be located over 100m from the boundary with properties in Manor Way although it is recognized that the MUGA will be located closer at 40m and the parking area (15m) with a new path providing pedestrian access from the entrance road to the buildings

located at the southern end of the site incorporated into the landscaping scheme located 5m from the boundary of the rear gardens in Manor Way. It is also important to note that the properties adjoining this site benefit from generous rear gardens ranging between 20-40m in depth resulting in a significant distance between the rear elevations of residential dwellings and the proposed primary and secondary school buildings.

It is considered that sufficient distances would be retained between the new buildings and the rear elevations of neighbouring properties to prevent any adverse impact in terms of over shadowing, loss of light or light pollution. Furthermore it is not considered that any overlooking or loss of privacy that could occur in terms of residential gardens or windows would be so detrimental as to warrant refusal of this application given the generous distances that would be retained.

The MUGA, parking areas and new path will generate activity and noise. Pupils will utilize the path introducing more activity closer to the boundary with the rear gardens of properties in Manor Way. The path is required to provide pedestrian access to the school buildings without needing to walk through the car park. It is not considered that the parking area or new footpath would generate an unacceptable level of activity, noise and disturbance. There is already the potential for staff and pupils to utilise this area of the site should they choose to do so and any increase would be unlikely to cause significant harm to amenity.

It is important to note that the application does not include any flood lighting for the MUGA as it is not intended to use this facility in the evening. Whilst the school buildings will be available for community use until 22:00 on weekdays it is not considered appropriate to allow the MUGA to be used until this time. The acoustic assessment suggests that the external areas within the site should not be used for prolonged periods and 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. This issue has been raised with the applicant and they are fully aware that approving a MUGA as part of this application is entirely without prejudice to the assessment of any future proposal for flood lighting.

It is recognized that the addition of a primary school 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 primary 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 size of the site, its relationship to neighbouring properties, the fact that the noise and activity will be largely limited to daytime hours (albeit with some community use of the buildings in the evenings) and having regard to the existing and long established use of the site for educational purposes.

This application was supported by an acoustic assessment and addendum which calculated the potential increase in noise arising from the intensification of the use, the report concludes that there would not be an unacceptable noise impact. This report has been scrutinized by the Council's Environmental Health Officer and its conclusions are considered to be robust.

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. The applicant has submitted a Dust Management Plan which has been assessed by Environmental Health Officers and deemed to be acceptable.

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 the proposal is not considered to have a significantly harmful impact on the amenities of nearby residents and therefore the proposal is considered to be acceptable in this respect.

### 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 was originally considered to be insufficient in terms of its content and conclusions. This issue was raised with the applicant and a further note was submitted.

The development does not comply with the London Plan requirements as the overall CO<sub>2</sub> reduction for the secondary school building would be significantly less than the 35% required by Policy 5.2 of the London Plan (24%). The applicant was asked to address this matter further but has been unable to increase the CO<sub>2</sub> reduction for the secondary school which they attribute to the fact that there is limited roof space available for PV panels. This is extremely regrettable particularly as the development also fails to provide any living roofs which is contrary to London Plan Policy 5.11 which requires major development proposal to incorporate living roofs and walls where possible. It is possible for PV panels to be positioned on top of living roofs. Indeed the provision of living roofs below photo-voltaic panels optimises the efficiency of the PVs bringing additional sustainability benefits to the development. It is considered that the lack of a living roof is a missed opportunity to make a positive contribution in terms of SUDs, ecological benefits and visual amenity.

However, on balance taking account of the benefits of the scheme in meeting a demonstrable demand for education provision in the borough, Officers do not consider that a reason for refusal on the grounds of sustainability could be justified. However, it is necessary to ensure that 35% for the primary school and 24% for the secondary school CO<sub>2</sub> reduction is secured by way of a condition to ensure that the development makes maximum provision towards addressing sustainability policies.

### 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 5<sup>th</sup> April 2015, the Council will need to link Education, Health and similar proposals to specific projects in the Borough.

In this instance in order to make the development acceptable in planning terms the following obligations are considered to be necessary:-

- A financial contribution towards the highway improvements (£40,000)
- Reimbursement of the Councils legal costs associated with the drafting, finalising and monitoring the agreement.

The applicant has agreed to enter into a s106 agreement to secure the above obligations.

#### Environmental Impact Assessment

A formal screening opinion was issued under Regulation 5 on 10 April 2015 confirming that the development is not EIA development.

#### 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, the proposal would have an acceptable impact on the designated Urban Open Space and would preserve the character and appearance of the conservation area.

It is considered that the transport impacts arising can be adequately mitigated through the use of a travel plan and financial contribution towards road improvements.

Officers consider that, with the recommended mitigation, planning conditions and obligations in place the proposal represents an appropriate form of development that would not give rise to unacceptable harm to amenity and save for the lack of living roofs and proposed reduction in CO<sub>2</sub> emissions would largely meet development plan policy requirements.

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 15/0909, excluding exempt information.

**RECOMMENDATION: PERMISSION** Subject to a S106 legal agreement and the following conditions:

1. A01 Commencement of Development  
A01 Reason – 3 years
2. The temporary accommodation for the secondary school hereby approved shall be removed and the land restored to a condition as set out in the plans hereby approved on or before 31<sup>st</sup> December 2017.

**Reason:** In accordance with the application details as submitted and in order to ensure that the additional buildings are removed once the permanent school is available for occupation in the interests of restricting the amount of development on site and protecting the character and amenity of the area in accordance with Policy BE1 of the UDP (2006)

3. NS - The development hereby approved shall be carried out strictly in accordance with the application plans, drawings and documents as detailed below:  
Plans Nos. 688-HABE-PL-002-00, 003-00, 004-00, 014-00, 015-00, 016-00, 017-00, 018-00, 019-00; 020-00, 021-00; 022-00, 023-00, 024-00, 688-HPFSB-PL-008-00 and 009-00; Kier Construction Management Plan, Air Quality Assessment, RPS Transport Assessment, Campbell Reith Drainage Impact Assessment, Van Zyl & De Villiers Ltd Energy Strategy, RPS Phase 1 Preliminary Risk Assessment and Phase 2 Environmental and Geotechnical Site Investigation Report, RPS Arboricultural Method Statement, RPS Updated Ecological Appraisal, Design and Access Statement Received 04 March 2015;  
Plan Nos. 688-HABE-PL-001-00, 005-00, 006--0, 007-00, 008-00, 009-00, 010-00, 011-00, 012-00, 013-00, 019-00; 688-HPFSB-PL-001-00, 002-00, 003-00, 004-00, 005-00, 006-00, 007-00, 010-00, 011-00, D2279\_P\_L.100 and L.200 Received 10 March 2015;  
Plan No. 688-HABE-PL-025-01 Received 07 April 2015;  
RPS Technical Note: Junction Impact Review Received 20 April 2015 and Kier Dust Management Plan Received 27 April 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.

4. NS – (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)

5. NS – (i) Above ground construction of the new buildings 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 insofar as it relates to each school building shall be implemented in full accordance with the details approved under Part (i) prior to any part of the relevant school building 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)

6. NS - (i) A detailed scheme of landscaping which shall include
- Details of bird and bat boxes
  - Details of log piles
  - Details of ecological improvements to the existing pond
  - Details and samples of any hard surfaces (NB: No loose materials shall be used for surfacing of the parking and turning area hereby permitted)
  - Full details of boundary treatments
  - Proposed plant numbers, species, location and size of trees and tree pits,
  - Furniture and lighting
  - Details of the management and maintenance of the landscaping for a period of five years

shall be submitted to and approved in writing by the local planning authority prior to construction of any above ground works.

(ii) The approved landscaping scheme shall be implemented in full and all planting, seeding or turfing shall be carried out in the first planting and seeding seasons following the completion of the new buildings hereby approved, in accordance with the approved scheme under part (i). 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, BE7, NE3, NE5 and NE7 of the UDP.

7. NS - Whilst the principles and installation of sustainable drainage schemes are to be encouraged, no infiltration of surface water drainage into the ground is permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approved details.

**Reason:** Infiltrating water has the potential to cause remobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of groundwater. Consequently it is necessary to prevent harm to human health and pollution of the environment in accordance with Policy ER7 of the Unitary Development Plan.

8. NS - Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

**Reason:** Piling or other penetrative methods of foundation design on contaminated sites can potentially result in unacceptable risks to underlying groundwaters. Where soil contamination is present, a risk assessment should be carried out in accordance with our Environment Agency guidance 'Piling into Contaminated Sites'. Piling is not permitted on parts of a site where an unacceptable risk is posed to controlled waters in accordance with Policy ER7 of the Unitary Development Plan.

9. The development shall be carried out in full accordance with the Construction Management and Dust Management Plans hereby approved.

**Reason:** In order that the local planning authority may be satisfied that the demolition and construction process is carried out in a manner which will minimise possible noise, disturbance and pollution to neighbouring properties and to ensure satisfactory vehicle

management in accordance with Policies BE1 T5, T6, T7, T15, T16 & T18 of the Unitary Development Plan.

10. NS – The development hereby approved shall be carried out in strict accordance with the materials as submitted with this application. Namely Sto Silco 1.5mm white render, Kaweneer Aluminium AA0541 Fenestration (RAL 7016 Satin) and Ibstock Brunswick Buff Bricks.

**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. NS - Prior to the new buildings hereby permitted being brought into use all parking and turning spaces hereby approved shall be completed in accordance with the approved details and thereafter shall be kept available at all times for such use and no permitted development whether permitted by the Town and Country Planning (General Permitted Development Order 1995 (or any Order amending, revoking and re-enacting this Order) or not shall be carried out on the land or garages indicated or in such a position as to preclude vehicular access to the said land or garages.

**Reason:** In order to comply with Policy T3 of the Unitary Development Plan and to avoid development without adequate parking or garage provision, which is likely to lead to parking inconvenient to other road users and would be detrimental to amenities and prejudicial to road safety.

12. 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

13. NS - 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

14. NS - Prior to installation of any fixed noise generating plant an acoustic assessment shall be submitted to and approved by the Local Planning Authority to prevent adverse effects from plant noise on local amenity. Once approved the plant shall be installed as approved and permanently maintained thereafter.

**Reason:** In the interests of protecting residential amenity in accordance with Policy BE1 of the Unitary Development Plan.

15. NS – (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 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.

16. NS –(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

17. NS - The application site is located within an Air Quality Management Area declared for NO<sub>x</sub>: In order to minimise the impact of the development on local air quality any gas boilers must meet a dry NO<sub>x</sub> emission rate of <40mg/kWh

**Reason:** To minimise the effect of the development on local air quality within an Air Quality Management Area in line with NPPF p124 and Policy 7.14 of the London Plan.

18. An electric car charging point shall be provided to a minimum of 5 car parking spaces with passive provision of electric charging capacity provided to an additional 5 spaces before any part of the new buildings hereby approved are first brought into use.

**Reason:** To minimise the effect of the development on local air quality within an Air Quality Management Area in line with NPPF p124 and Policies 6.13 and 7.14 of the London Plan.

19. (i) The development hereby approved shall include the provision of Photovoltaic Panels on the roof of the secondary and primary school buildings in order to achieve a minimum of 41,971kWh/annum for the secondary school and 17,526kWh/annum for the primary school in addition to the implementation of all measures set out in the Energy Strategies hereby approved, in order to ensure that the secondary school will achieve a minimum of 24% reduction in CO<sub>2</sub> and the primary school a minimum of 35% reduction in CO<sub>2</sub> below ADL2013.

(ii) Within 3 months of the first occupation of either of the buildings hereby approved evidence shall be submitted to the local planning authority to demonstrate that the photovoltaic panels have been installed on each building and the minimum kWh/annum set out in (i) can be achieved.

**Reason:** In order to ensure that the development can achieve the CO<sub>2</sub> 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.

20. The Multi Use Games Area (MUGA) hereby approved shall only be used between the hours of 08:25 – 18:00 on any day Monday to Sunday 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).

21. NS - Notwithstanding the Town and Country Planning (General Permitted Development) Order 2015 (or any Order revoking, re-enacting or modifying that Order), no plumbing or pipes, other than rainwater pipes, shall be fixed on the external elevations of the buildings hereby approved.

**Reason:** It is considered that such plumbing or pipes would seriously detract from the appearance of the building(s) and to comply with Policy BE1 in the Unitary Development Plan.

22. NS – The only pedestrian and vehicular access to the school site shall be via Manor Way as shown on the plans hereby approved and no other access shall be created or utilised without prior written consent being first obtained in writing from the local planning authority.

**Reason:** In accordance with the details of the application as assessed and to prevent harm arising in respect of highway safety or amenity in accordance with Policies BE1 and T18 in the Unitary Development Plan.

23. NS - The development hereby approved shall be carried out strictly in accordance with the phasing plan hereby approved unless otherwise agreed in writing.

**Reason:** To ensure that the development is carried out in accordance with the approved documents submitted with the application and in the interests of protecting amenity in accordance with Policy BE1 of the UDP. .

## **Informatives**

1. D125 – Mayoral Community Infrastructure Levy

2. NS - 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. NS - Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

4. NS - 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 [wwriskmanagement@thameswater.co.uk](mailto:wwriskmanagement@thameswater.co.uk). Application forms should be completed on line via [www.thameswater.co.uk/wastewaterquality](http://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.

5. NS - If during the works on site any suspected contamination is encountered, Environmental Health should be contacted immediately. The contamination shall be fully assessed and an appropriate remediation scheme submitted to the Local Authority for approval in writing.