

Section '3' - Applications recommended for PERMISSION, APPROVAL or CONSENT

Application No : 15/00640/CONDT2

Ward:
Shortlands

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

OS Grid Ref: E: 539495 N: 168950

Applicant : Mr Paul Barry

Objections : YES

JOINT REPORT WITH 15/00640/CONDT3

Description of Development:

Details of conditions submitted in relation to planning permission ref: 15/00640:
Condition 12 – Car Park Management Plan
Condition 14 - Travel Plan

Key designations:

Biggin Hill Safeguarding Area
London City Airport Safeguarding
Smoke Control SCA 21
Smoke Control SCA 9

Proposal

Details pursuant to conditions 12 and 14 of permission 15/00640/FULL1 relating to submission and approval of a Car Park Management Plan and a Travel Plan have been submitted to the Council. The submissions relate to a new two form entry primary school (Harris Shortlands) which is being constructed at the site. The submissions have been made separately but are considered together in this report.

The relevant conditions are as follows:

12. Details of a scheme for the management of the car park shall be submitted to and approved in writing by the Local Planning Authority before any part of the development is first occupied and the car park shall be operated in accordance with the approved scheme at all times unless previously agreed in writing by the Authority.

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.

14. *Prior to the commencement of the use hereby permitted, a Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan should include measures to promote and encourage the use of alternative modes of transport to the car. It 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.

The submissions comprise a Car Park Management Plan document (condition 12) and Travel Plan document with Appendixes (condition 14).

The Car Park Management Plan document sets out how the car park will be managed to ensure it is only used by staff and visitors.

The Travel Plan is a detailed document which cross references the documents submitted with the planning application and provides additional data and information based on staff and pupil surveys, along with proposed measures to encourage sustainable travel to the site.

Confirmation has been received that the school will not be opening before September 2016. Also information has been received on Travel Plan data since original submission as follows. This does not alter the recommendation:

“The travel plan was submitted prior to the announcement of primary school allocations in May 2016. Therefore, no information on the new 2016 pupil’s intake was available at the time of writing the travel plan.

Subsequent to the submission, whilst an initial allocation of pupils for the September 2016 intake has been made, this is likely to be subject to change up to the beginning of the new school year 2016/17. For example, some offered places may be declined up to the opening of the school and also pupils can change schools during the academic year. Furthermore, whilst home postcodes for the children initially allocated a place could be obtained, no information on actual or anticipated travel behaviour can be obtained at this stage (or indeed could be estimated, e.g. based on home postcodes) which drives the baseline and mode split target setting for the Travel Plan.

It is therefore considered appropriate to maintain the Travel Plan baseline as provided and survey the final 2016/17 intake as part of the year 1 monitoring regime, as outlined in Section 8 of the Travel Plan; which suggests biennial surveys (year 1, 3, 5) to be undertaken. This will also allow for:

a) *settling in of new pupils into a new travel behaviour pattern, which can then be surveyed; and*

b) settling in of existing pupils to verify their anticipated travel behaviour (see section 4 of the TP) prior to the relocation against the actual travel behaviour to adjust the package of Travel Plan measures and targets, if required”

Consultation

A number of representations have been received from local residents, the Shortlands Residents Association and the vicar of St Mary’s Church regarding the Travel Plan submission (condition 14). These express concerns including points as follows:

- Concerns about parking data and parking layout
- Current traffic levels are dangerous and there is an accident risk
- There should be a Controlled Parking Zone introduced
- A high proportion of children will be driven to school
- Parking problems will occur including in dangerous locations
- Commuter parking will be displaced / affected
- Proposed CPZ is not sufficient
- Plan should include a greater commitment to reducing staff car journeys
- Inconsiderate parking is likely to take place
- Driveways will be blocked which will impact on resident’s amenities
- Concerns about the ability of the bus route to operate properly
- Junction at Mays Hill Road / Kingswood Road has restricted sightlines and Mays Hill Road has a blind bend which will increase collision potential
- Valley Road and Hillside Road is a rat run with safety issues
- Safety issues around Iden Close and entrance may be blocked
- A phone number should be available for residents to call when there is an obstruction by school or commuter parking
- Transport Assessment and Travel Plan figures are inconsistent
- Parking availability for visitors to local residents will be affected
- Travel Plan has been submitted late in the process
- Question data used, and assumptions that car use will fall are inaccurate
- Impact on groups using St Mary’s Church
- No solution is offered to the inevitable increase in congestion and parking
- Onsite parking is not adequate
- Emergency vehicles may be impeded

Representations have also been received in support of the Travel Plan from residents from a wider area.

The full text of representations made is available on the application file

At present one representation has been received in respect of the Car Park Management Plan (condition 12), which relates to issues of congestion, safety, parking problems, bus route issues, parking over driveways and the large proportion of staff who intend to travel by car.

In respect of condition 14 (Travel Plan), the Council’s Highway Engineer comments as follows:

“The school site is in an area with low PTAL rate of 2 (on a scale of 1 - 6, where 6 is the most accessible). The development comprises a two form entry primary free school which is anticipated to reach maximum its maximum capacity of 420 pupils and 36-50 staff in September 2020.

Temporary Site

The current (temporary) accommodation of the School is located at Westmoreland Road within Bromley town centre.

Future Site

The school is scheduled to open at the permanent site in September 2016 which is located at the junction of Mays Hill Road, Valley Road and Kingswood Road in Bromley.

An initial provision of 28 cycle parking spaces (14 stands) for staff and pupils, and 36 scooter parking spaces (two stands) for pupils has been provided in close proximity to the two pedestrian entrances.

Vehicular access to the Site is possible in two locations, one on Kingswood Road, providing access to the two disabled spaces and the other situated on Mays Hills Road, providing access to a 20 space car park for staff. This equates to a total of 22 spaces off street car parking spaces.

Servicing and refuse collection for the Site will occur from the loading bay located on Mays Hill Road.

Parking

Valley Road and Hillside Road form the boundary of Controlled Parking Zones (CPZ) (Bromley Central) and (Bromley South) which operate from Monday to Saturday, 12:00 to 14:00. Parking is controlled by residential, as well as business and visitor permits (Bromley South CPZ only).

Parking in Mays Hill Road and Kingswood Road is generally unrestricted, with white H-bar markings outside private residential drives, as well as single and double yellow lines.

A Parking Stress Survey was undertaken in June 2014 identifying 1,290 metres of available kerb length for parking, equivalent to 151 legal spaces.

During the key school run periods the survey shows occupancy of between 42% and 26% from 08:00 to 09:00, and 25% from 15:00 to 16:00. The impact of commuter parking during these periods is particularly high, with 56 to 75 vehicles between 08:00 and 09:00, and 84 to 92 vehicles between 15:00 and 16:00 associated with commuter parking.

Overall, the maximum number of parked vehicles with 124 occurred between 11:30 and 12:30 which equates to a parking stress of 82%. The lowest parking occupancy was observed at the start of the survey at 5:30

with 32 vehicles (21% parking stress), with the average number of parked vehicles across the survey period at 88 (42% parking stress).

Current Operation and Travel Behaviour

The existing travel behaviour at the temporary HPAS site on Westmoreland Road.

Pupil Intake - Phasing of School Pupil Population

	Westmoreland Road		Kingswood Road				
	2014	2015	2016	2017	2018	2019	2020
Reception	60	60	60	60	60	60	60
Year 1	-	60	60	60	60	60	60
Year 2	-	-	60	60	60	60	60
Year 3	-	-	-	60	60	60	60
Year 4	-	-	-	-	60	60	60
Year 5	-	-	-	-	-	60	60
Year 6	-	-	-	-	-	-	60
Total	60	120	180	240	300	360	420

Table below showing phasing of School Staff Population

	Westmoreland Road	Kingswood Road				
	2015	2016	2017	2018	2019	2020
Class Teachers	4	6	8	10	12	14
Other Teaching Staff	7	5-9	7-12	8-14	9-16	10-20
School Leadership Team	3	3	3	3	4	4
Other Teaching Staff	3	8	8	8	8-10	8-12
Total	17	22-26	26-31	29-37	33-42	36-50

The School was opened in September 2014 with two forms of entry to Reception (53 pupils). As of March 2016, the school currently has 113, and employs 16 staff, of which:

- 5 teachers;
- 4 teaching assistants;
- 2 school leadership team (SLT);
- 1 admin staff; and
- 4 support assistants

All class teachers are employed full-time, while other teaching staff are estimated 75% fulltime and 25% part-time. All SLT staff will be full-time, while other staff will include up to three full-time and the remainder part-time staff.

The School currently operates a full school day starting at 08:40 and ending at 15:20.

HPAS provides a breakfast club from 07:30 and afterschool club from 15.20 to 18.00. 15 children are currently registered for the afterschool club.

From September 2015, in order to support the children at the School, HPAS will introduce co-curricular clubs which will include:

This shows that the current mode split can be attributed to the current temporary location of the school at Westmoreland Road and to the unrepresentative catchment which is likely to change as the school grows in size, and is them more likely to reflect local travel behaviour to and from the school.

As part of the Travel Survey parents were also asked how they intended to travel to the new School site in September following the move. Anticipated Pupil Mode of Travel (Permanent Site) as follows:

Car 32%, car share 11%, Walk 28%, Scooter 22%, Bus 5% and Train 2%.

The majority of pupils arrive and depart in time for the start and end of the school day, with 8% and 17% stating that they partake in breakfast club and afterschool clubs respectively.

The current after-school club capacity for up to 21 children and this is set to increase next year to 28, also increasing the number of clubs to at least 3 per week.

The current Staff travel (Temporary Site) behaviour of staff as follows:

8% walking,

8% bus,

84% driving alone.

Anticipated Staff Mode of Travel (Permanent Site) as follows:

7% Walking

7% Cycle

14% Bus

72% Car (Single Driver)

The approximate arrival and departure times for staff are:

Half of staff arrives between 07:30 and 08:00 AM, with 37% arriving earlier and 13% later.

Targets

Targets are measurable goals by which the progress of the Travel Plan (TP) will be assessed. Targets are essential for monitoring the progress and success of the TP. Targets should be “SMART” – specific, measurable, achievable, realistic and time-bound.

The suggested targets are based on the existing travel survey data collected in March 2016 as part of the baseline for this TP. The suggested targets represent what is considered to be ambitious but achievable increase in sustainable travel as a result of the introduction of the TP. It may be possible that if sustainable transport modes are promoted before full occupation, travel behaviour can be positively influenced.

Furthermore the new site location is expected to positively impact on the sustainable travel behaviour of pupils in particular, with parents anticipating

the Kingswood Road location and additional siblings increasing the potential for car sharing.

Updated Impact Assessment

The impact of the school on the parking availability on Kingswood Road and Mays Hill Road has been assessed utilising the following (maintained) assumptions:

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

Conclusion & Recommendation

The current school catchment has been established as predominately to the north and northeast of the school, predominately from postcode areas BR1 and BR2 with 43% and 39% respectively.

A travel survey among pupils (and staff) has been carried out in March 2016, recording the existing behaviour at the existing Westmoreland Road site, and the anticipated travel behaviour at the new Kingwood Road site, establishing the baseline travel behaviour for the school.

The impact of vehicular traffic from staff and pupils has been assessed, based on the parking surveys carried out in June 2014, the above findings of the pupil survey and subsequent targets over the lifetime of this TP, reflecting the gradually increasing pupil and staff numbers.

It concludes that, capacity will remain available within Mays Hill Road and Kingswood Road, assuming that the Travel Plan targets set out not be met, the above planning condition and the corresponding funding provided by the Harris Federation provide the means to trigger the proposed parking restrictions, entailing the extension of the existing Controlled Parking Zone to cover Mays Hill Road and Kingswood Road.

By removing the existing level of all day commuters parking in the area, an extended CPZ would generate the kerbside space to accommodate car-based drop-off and pick-up movements by parents during the two main peak periods of the day, but throughout the working day.

Given the reasons above I raise no objection to the Travel Plan.”

In respect of details submitted pursuant to condition 12, the Car Park Management Plan, the Highway Authority has no objections.

Planning Considerations

Relevant Development Plan Policies and related guidance are as follows:

Unitary Development Plan Policy T2 – Assessment of Transport Effects

London Plan 2016 – Chapter 6 – London’s Transport, in particular Policy 6.3
Mayor of London Transport Strategy 2010

National Planning Policy Framework – in particular Chapter 4

National Planning Practice Guidance “Travel plans, transport assessments and statements in decision-taking”

Transport for London Travel Plan guidance

Planning History

Permission 14/02667/FULL1 was granted at Plans Sub Committee on 6th November 2014 for “A two form entry primary school, involving the demolition of all existing buildings together with the erection of a two storey building with associated vehicular access, parking and landscaping”.

Details pursuant to the following conditions were approved on 8th July 2015 under delegated powers under reference 14/02667/CONDIT:

Condition 2 - landscaping

Condition 3 - boundary enclosures

Condition 7 - external surfaces

Condition 8 - surface water drainage system

Condition 11 - refuse and recycling storage

Condition 19 - slab levels

Details pursuant to the following conditions were approved on 23rd April 2015 under delegated powers under reference 14/02667/CONDT1:

- Condition 15 - crime prevention
- Condition 16 - scheme of lighting

Details pursuant to the following conditions were approved on 10th June 2015 under delegated powers under reference 14/02667/CONDT2:

- Condition 13 - construction management plan

Details pursuant to the following conditions were approved on 8th July 2015 under delegated powers under reference 14/02667/CONDT3:

- Condition 24 - dust management
- Condition 25 - construction logistics plan
- Condition 26 - air quality assessment
- Condition 27 - mitigation measures

Permission 15/00640/FULL1 was granted under the Chief Planner's delegated powers on 7th May 2015 for "Variation of Condition 17 of permission ref. 14/02667/FULL1 (granted for a two form entry primary school, involving the demolition of all existing buildings together with the erection of a two storey building with associated vehicular access, parking and landscaping) to allow amendment to the approved scheme including the removal of part of the first floor, reconfiguration of the first floor, removal of the roof overrun of the external staircase and an increase of the screened roof plant area".

Details pursuant to the following conditions were approved on 30th December 2015 under delegated powers under reference 15/00640/CONDIT:

- Condition 2 - Landscaping
- Condition 3 - Boundary enclosure
- Condition 7 - External surfaces
- Condition 8 - Surface water drainage
- Condition 11 - Refuse Storage
- Condition 15 - Crime
- Condition 16 - Lighting scheme
- Condition 19 - Slab levels
- Condition 24 - Dust management
- Condition 25 - Construction logistics plan
- Condition 26 - Air quality assessment
- Condition 27 - AQMA air quality

Details pursuant to the following conditions are currently being considered under delegated powers under reference 15/00640/CONDT1:

- Condition 21 - Noise insulation and mitigation for school building
- Condition 22 - Noise mitigation scheme for play areas

Conclusions

The construction of a new two form entry primary school was granted planning permission by the Council in November 2014 and a revised permission in May 2015. The school is currently being constructed.

A Car Park Management Plan and Travel Plan have been submitted pursuant to conditions 12 and 14 of the latest planning permission for the site.

Condition 12 – Car Park Management Plan:

The management plan sets out how the two approved on site car parking areas will be managed. The parking will provide sufficient space for all permanent staff. It clarifies that the main car park will be for staff only with a manually operated barrier which will be controlled by the school caretaker, and will be left open during the school day and available to staff on a first come first served basis. Visitors will be able to park if there is space available and will require a permit obtainable from the school reception.

The caretaker will be responsible for the overall management of the car park and will undertake checks to ensure users are permitted. The smaller car park will be controlled by automated barrier from the school reception. The car park management plan will be reviewed each term to ensure it is being managed appropriately.

The Highway Authority has no objection to the Car Park Management Plan, and it is considered to set out an acceptable and effective way to manage the car parking on site. It is recommended that the details pursuant to condition 12 be approved.

Condition 14 – Travel Plan:

A Travel Plan is defined in the National Planning Policy Framework as *“A long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives through action and is articulated in a document that is regularly reviewed.”*

In granting planning permission for the development, the Council considered the transport impacts of the proposed development including the submitted Transport Assessment. The transport impacts of the development have therefore been found to be acceptable. The submission and consideration of a Travel Plan is not to reconsider whether the transport impacts of the development are acceptable, but, as set out in the supporting text to UDP Policy T2:

“5.18 A Travel Plan will normally be required to ensure that methods of reducing the number of visits by car are thoroughly explored and then implemented. Travel Plans should set objectives for reducing car usage, increased walking, cycling and public transport use, improvements in safety features, environmentally friendly freight movement and delivery services.”

The government’s National Planning Practice Guidance states:

“Travel Plans are long-term management strategies for integrating proposals for sustainable travel into the planning process. They are based on evidence of the anticipated transport impacts of development and set measures to promote and encourage sustainable travel (such as promoting walking and cycling). They should

not, however, be used as an excuse for unfairly penalising drivers and cutting provision for cars in a way that is unsustainable and could have negative impacts on the surrounding streets.”

A number of representations in objection have been received from local residents, and some of these seek to challenge the approved scheme layout, and data and conclusions already accepted with the grant of planning permission for this development. However, the decision as to whether to approve the Travel Plan must be based on the merits of the Travel Plan and what it is intended to achieve, and not concerns about the principle of the development, which has already been found to be acceptable.

The Council's Highway Authority is considering measures to help manage the impact of the development on the surrounding area in terms of traffic movements and parking. The applicant has provided a contribution towards these measures as part of the s106 legal agreement which accompanied the planning permission. These have yet to be finalised but are expected to include changes to yellow line and waiting restrictions within the vicinity of the school. However, this application to discharge the Travel Plan condition is not a mechanism for approving, changing or not approving any on street parking measures such as yellow or white lines, a controlled parking zone or any other measures which are within the control of the Local Highway Authority and being taken forward in accordance with the normal procedures of the Highway Authority.

The Travel Plan is a document which requires ongoing monitoring. The Council's Highway Authority works with schools across the Borough to monitor and implement Travel Plans on an ongoing basis. This proposal includes such a review and monitoring mechanism which will continue to seek to improve sustainable travel measures for the school. The school will have a Travel Plan co-ordinator who will liaise with the Council as the school becomes established to ensure that appropriate measures are being implemented.

The submitted Travel Plan document is consistent with the NPPF and is considered to be fit for purpose. No objections to its form and content have been raised by the Highway Authority. It will be the subject of ongoing liaison and monitoring with the Local Highway Authority as in all cases. It is recommended that the details pursuant to condition 14 be approved.

RECOMMENDATION:

**Condition 12 – Car Park Management Plan
APPROVAL OF DETAILS**

**Condition 14 – Travel Plan
APPROVAL OF DETAILS**