

Application No : 16/03315/FULL1

**Ward:
Bickley**

**Address : St Hughes Playing Fields
Bickley Road
Bickley
Bromley**

OS Grid Ref: E: 541958 N: 169210

Applicant : Kier Construction (Southern)

Objections : YES

Description of Development:

Proposed erection of a 6FE Secondary Boys School comprising a part 2 storey, part 3 storey school building of 8,443m² including a sports hall (also for wider community use) together with hard and soft landscaping, creation of a new vehicular access on Chislehurst Road, 68 parking spaces, drop off/pick up area and associated works. Erection of a temporary 2 storey classroom block on site for 12 months to accommodate 5 classrooms, a laboratory, offices and toilets.

Key designations

Biggin Hill Safeguarding Area
London City Airport Safeguarding
Smoke Control SCA 10
Urban Open Space

Proposal

Full planning permission is sought for a new 6 Form Entry (FE) boys secondary school on the 4.69ha site, to accommodate up to 900 pupils with 64 full time equivalent staff. The age of boys is to be 11-16 and no sixth form entry is being proposed. The development is proposed to comprise the following elements:

Building and Works

- New split level school building of up to 3 storeys in height of 6770sqm
- Building will comprise main hall, dining hall, library, internal atrium, 39 teaching spaces and associated facilities
- Two storey Sports Hall including an activity studio which will also be available for community use (18m x 133m)
- Single entrance to building from Chislehurst Road
- Modern elevational treatment - grey brick to ground floor and some parts of the elevations of the building and a cladding system to the upper elevations in a mix of green, blue and grey panels, used

- horizontally and vertically
- PV panels to the roof
- Hard surfaced outdoor play areas around school building
- 2 hardstanding enclosed ball/games courts adjacent to school building
- Demolition of existing Pavilion and Cadet's Hut
- Relocation of Air Force Cadets to girls' school site during construction and use of school building once completed
- Retention of the majority of the existing playing fields and trees on the site
- Sports pitches to include 2 full sized pitches including a rugby union pitch, use for Football u13, Hockey and Lacrosse, in addition a 8 lane 100m running track and long jump pitch retained
- Separate bin store/delivery bay off Chislehurst Road including turning head
- Substation adjacent to Chislehurst Road

Access arrangements

- New primary vehicular and separate pedestrian access off Chislehurst Road with gates and welded mesh fencing
- New pedestrian access off Bickley Road
- One-way system through site with the ability to stack up to 50 cars on site
- Access and car parking with dedicated drop off area for 10 cars
- Reuse of existing vehicular exit off Bickley Road
- Main car park next to entrance for 11 visitor spaces inc. 5 DDA spaces
- Staff car parking area for 58 spaces also to be used for water attenuation
- Overflow car parking on games courts for events of up to 79 spaces (30/49 split between separate areas/courts)
- 36 cycle storage spaces in two locations and potential for a further 120 spaces if required.
- Construction access route from Chislehurst Road

Temporary development

A two-storey temporary mobile classroom building is also proposed and is to be sited close to Bickley Road which was originally due to commence a Year 7 intake in September 2017. It is expected that this structure will be in place for a one year period. This element includes:

- Two storey grey prefabricated temporary building 31m x10m
- Height of temporary building will be approximately 7m
- Comprising 5 classrooms, science laboratory, offices and toilets
- To accommodate 180 pupils and associated staff
- Proposed for a one year period and removed after completion of the main school building
- Provision of security fencing and temporary access gates
- Sited on proposed permanent staff car parking area

- Permanent parking area, upgrading of access drive, turning area and new pedestrian access to be implemented as part of the temporary accommodation
- Vehicular access from Bickley Road to be used for access and egress during school collection/drop-off hours
- Parking for staff and visitors - 9 spaces and a drop off area for 10 spaces including turning space
- Use of remaining hard surfaced area for outdoor play
- Use of existing playing fields throughout

Additional information was submitted in November 2016 to clarify and provide additional information in respect of a number of aspects.

Application Submission

The applicant has submitted the following documents to support the application:

Planning Statement: The statement sets out the overall policy background and identifies the planning considerations relevant to the application. It sets out the application and its background, the proposal being set out and the educational need for the school. It identifies the key planning considerations and concludes that the proposed development is sustainable and that all relevant material considerations have been addressed.

Additional Submissions Statement: This is an additional statement following the submission of revised information and clarification. It clarifies the need for the school and sets out the site selection consideration, playing fields and open space, community use, design and layout, access and highways issues, energy and sustainability and noise. It concludes that the revised and additional information adequately address the issues raised by the GLA and demonstrates that the scheme is appropriate in planning terms.

Alternative Site Selection Report: An additional report submitted to identify potential available sites for a school within a 5 mile radius. This identifies a wide number of potential sites and each have been considered in terms of their suitability. This includes residential sites, employment sites and sites within the MOL and GB. No sites have been identified as preferably more suitable for the construction of a new school.

Design and Access Statement: This document covers a wide range of aspects in relation to the proposed design and access arrangements to the building and site. It addresses the background, site analysis, proposed development including an assessment of the visual impact of the proposal and impact on the street scene, building and site access and circulation, appearance, landscaping and materials in all respects. The detailed aspects of the temporary accommodation are outlined and discussed and also the sports pitches and their provision.

Addendum: This document has been submitted to address comments received from local residents, the LPA, GLA, Sports England and other representations and consultees. It addresses in more detail the site viability, building positioning, building aesthetics, London Plan considerations (in particular sustainability measures) and access and transport options including alternative site entrance/exit options. It concludes that these aspects have been fully considered and the proposed scheme results in the best option for a school and its layout on the site.

Community Use Statement: An additional statement outlining the proposed community use of the resulting school building and site. It is expected the site will be available for sports, educational, health and community groups. However it is not anticipated that the site will be available for weddings or parties etc. The site is already used for football coaching, primary school events, the Local Astrological Society and running group practice. It is also used by the Air Training Cadets and Bickley Park Forest School and it is intended that these uses will continue.

After hours uses could include use of the school field (daylight hours only), Sports Hall, Dining Hall and Main Hall, Activity studio, Drama studio and classrooms. It is expected to be available to various community groups, activity programmes and adult education classes. Hours of use will be 17.00 – 21.30 Monday-Thursday and 09.00-12.30 on Saturdays except holidays and between 09.00-16.00 during the week in school holidays. These will be strictly controlled and a member of staff will be on-site at all times during a letting. Numbers on site will be limited to the vehicles which can be accommodated on site.

Statement of Community Involvement: Consultation was undertaken with the Borough Council, local residents and local Ward Councillors. A Public Consultation Event was held at Bullers Wood School for Girls on 29th June 2016. Prior to the event a poster was displayed at the site and advertised on the school website, 700 leaflets were also distributed and copies sent to the Ward Councillors. 198 people attended the event and 125 completed a feedback form. Further meetings have been held with local residents and local councillors. Similar concerns were raised to those submitted formally in respect of the application.

Transport Statement:

This has been amended and updated since submission. A detailed Transport Statement has been submitted which includes existing, proposed and predicted traffic flow data and counts, a Stage 1 Road Safety Audit, Parking Stress survey, traffic queue length surveys and traffic light timings. It identifies all aspects of the traffic implications of the proposals including vehicular and pedestrian routes and proposals, layouts, parking plans, swept path analysis, public transport availability and measures to minimise the need for the cars and encourage sustainable measures to encourage walking and public transport to the site for pupils and staff. It identifies that the school opening hours will be 7.45 – 14.15 with compulsory enrichment/homework sessions until 15.20 to minimise additional traffic at peak times. Alternative access arrangements and options have also been considered.

It concludes that a number of access options have been explored in the design process and explains that the chosen solution with a new access and entrance only from Chislehurst Road and exit only from the existing Bickley Road access was found to have the least environmental impact, be most technically sound, allow for traffic to be shared across both roads and is the preferred option from a highway engineering and safety perspective given the nearby junctions. Dedicated pedestrian access routes minimise conflict and provide access to public transport connections which will include a puffin crossing. A total of 69 car parking spaces are proposed, 36 cycle spaces, 10 vehicle drop off/pick up area and capacity for 50 cars on the site access road. All access points into the site can accommodate the appropriate size of vehicle, including service vehicles which can all turn on site. Therefore all vehicles can be accommodated on site and there is no need for parking on public highways.

Proposed traffic levels have been identified and sourced from staff and pupil levels and modal splits at the Girls School and it is estimated that 235 additional trips in the AM peak hour and 40 in the PM peak hour are proposed when taking into account measures in the Travel Plan. Whilst the junction modelling shows that 3 local junctions exceed their theoretical capacity in future year scenarios, the impact of the development traffic is minimal when compared to the base traffic flows and is not considered to be severe in accordance with paragraph 32 of the NPPF. Additional 152 rail trips, 218 bus trips are identified and there is capacity to accommodate these additional trips. The temporary accommodation will be served by 9 parking spaces, a 10 space drop –off/pick-up area, turning area and the use of Bickley Road for access and exit purposes during the use of the temporary accommodation. This part of the site will be fenced off from the construction site.

Highway safety implications have been considered and personal injury accidents are at a normal level for an urban location. Road safety concerns are not expected to be exacerbated by the proposed development. There is therefore no significant impact in transport terms and the Travel Plan identifies the commitment to minimise trips and maximise sustainable modes of travel.

Draft Travel Plan: The plan aims to minimise the impacts of the school on the surrounding environment with regard to vehicle trips and congestion. The objectives include the increased use of public transport and walking by both pupils and staff. The report sets out to reduce car travel by 10%, a minimum 10% increase in pupils travelling by sustainable modes and a minimum 20% reduction in staff using single occupancy travel. It identifies walking, cycling and public transport initiatives and measures to reduce staff travelling by car. The report is based on the travel patterns at the girls' school nearby and is initially set out for a 5 year period. The report is an ongoing strategy to encourage sustainable travel and will be regularly monitored with surveys every 6 weeks. The plan will be managed by the school with a travel plan co-ordinator appointed and a steering group set up to include members of the community.

Construction Traffic Management Plan: The plan outlines the management practices to be implemented throughout the period of construction works. It is expected the final Construction Management Plan (CMP) would be controlled through a condition. The CMP identifies the order of works with the first works providing a new access from Chislehurst Road, hardstanding for car parking and access and the temporary mobile school classrooms. The construction vehicles are to access the site from Chislehurst Road with turning and delivery provided on site. 67 car parking spaces for construction workers are to be provided on site. It identified that construction work is expected for a period of 18-24 months and indicative numbers for construction vehicles are provided. It is proposed to set up a Transport Steering group and a Transport Coordinator and the site will be controlled by a Banksman and Booking system for deliveries. Further details are to be discussed before works commence and include measures to minimise noise, vibration and dust from the site.

Arboricultural Report: The site is covered by a Tree Preservation Order and still shows signs of its past use, mainly by the trees present as the size and species show that they were landscape features of the manor house which used to be located on the site. This includes an avenue of pollarded Lime trees and established tree groups. A total of 90 individual trees, 16 groups and 1 woodland are the subject of the report which has been undertaken in accordance with BS 5837:2012. 15 individual trees have been categorised as 'A' grade trees of high quality and value, 54 individual trees, 8 groups and 1 woodland have been categorised as 'B' grade of moderate quality and value. 21 individual trees and 8 groups have been categorised as 'C' grade trees of low quality and value. C grade trees should not pose a constraint to development.

Arboricultural Impact Assessment: 5 B grade trees, a section of 1B grade group, a section of 1 B grade woodland, 5 C grade trees and 1C grade group will be removed to facilitate development and the impact to amenity should be minimal. Root protection zones (RPZ) have been identified and a preliminary tree protection plan has been produced. A final Tree Protection Plan and Arboricultural Method Statement will be required by condition in order to protect and retain the trees on site. Any works within a RPZ which includes the existing access road, new footpaths should be conducted using a minimal dig methodology and use cellular webbing.

Preliminary Ecological Appraisal: An appraisal was undertaken to determine the ecological value of the site, its habitats and if there are any protected species on the site. The site is dominated by amenity grassland, with areas of dense scrub habitat, mature tree lines, broad-leaved woodland, hardstanding and non-native boundary hedgerow. The pavilion building and ten onsite trees have potential to support roosting bats. Small areas of vegetation suitable for reptiles will be removed to facilitate development. Four invasive species are present on site. The appraisal concludes that further bat surveys are required. The small area of suitable reptile habitat that will be lost must be cleared under ecological supervision during April to September; any other vegetation clearance should be undertaken during October to February and will need to be preceded by a bird nesting check. Site enhancement measures include the establishment of a new hedgerow section on the

northern boundary, establishment of rough grass margins and the inclusion of nest bricks within the new building for house sparrow and starling. Other precautionary measures are advised during construction stages.

Bat Report: The survey results observed no bats emerging from the potential bat roosting features and it is unlikely that bats are roosting within the pavilion, a license will not be required for its demolition but ridge tiles should be removed under supervision. Bats are using the site and to ensure the grounds remain suitable for bat foraging and roosting, external lighting shall be minimised wherever possible, especially in the vicinity of boundary vegetation and trees that support features suitable for roosting bats. The lighting scheme will use warm white LED lighting which shall be directed to ground and light spill minimised. Further tree surveys will be required if illumination of any trees and used to inform mitigation and licensing requirements. Enhancement measures should include bat boxes affixed to boundary trees in dark areas. Further tree surveys, if required can be controlled through a condition.

Archaeological Desk-Based Assessment: The assessment did not identify any currently known significant archaeological remains, although there is potential for buried archaeological remains to be present, particularly associated with the Widmore estate within the northern part of the site. It is recommended a geophysical survey should be undertaken as a first phase of a staged scheme of evaluation. The results can be used to determine the best location for the proposed works and service trenches and if further works are appropriate. Several tree-lines and wooded areas have been identified within the boundaries of the proposed development area as qualifying as 'historically important' under the terms of the 1997 Hedgerows Regulations. It is recommended that any changes to these assets be avoided or minimised.

Written Scheme of Investigation: This outlines a scheme of evaluation to provide a programme and methodology for undertaking the works, the standards to be attained and the procedures for analysis and reporting. There is relatively low archaeological potential for the area prior to the post-medieval period. Evidence suggests the possibility that much of the footprint of the proposed development area may have been quarried in the early nineteenth century. This evaluation comprises fairly limited trenching on site to determine the presence or not of any quarries. The second phase would examine areas shown not to have been quarried.

Flood Risk Assessment: Assessment of flood risk and options for surface water drainage. The site is within Flood Zone 1 and therefore is considered to have a low risk from fluvial flooding. Infiltration drainage will be suitable for this site and porous paving within the proposed southern car park area is proposed. This will have the capacity to receive all runoff from the development. Connection to existing foul drainage is proposed.

Phase 1 Desk Study and Preliminary Risk Assessment & Phase 2 Ground Investigation Report: The preliminary risk assessment and site walkover identified a number of potential contaminant sources and pathways to potential receptors. Therefore it was advised that an intrusive ground

investigation to determine the extent of any potential contamination within any groundwater and soil strata was required. A number of exploratory holes were positioned across the site and samples exhibited levels of hydrocarbon contaminants above screening values and a pathway exists to potential receptors. It is therefore considered that a risk to human health is present and further investigation and remedial measures are required. The level of made ground on the site results in a recommendation that a suspended ground floor slab is adopted.

Air Quality Assessment: The proposed development lies outside the Air Quality Management Area (AQMA). This assessment is to determine the impact of emissions from road traffic on sensitive receptors. Additional car journeys generated by the development have been considered and will not have a significant impact on local pollutant concentrations. The assessment is in relation to the exposure of occupants of the new development rather than the impact of development.

Predicted concentrations have been compared with air quality objectives and indicate the annual mean NO₂ concentrations are below the objective in the worst case scenario. Concentrations of PM₁₀ are predicted to be within the annual mean objective in 2019. It is encouraged to extend the distance between the school buildings and outdoor play areas with the A222 road source to reduce exposure of children and school users to elevated pollutant levels.

Additional information: This includes the addition of an air quality monitor on the northern boundary before and during construction to log data electronically to allow this information to be monitored.

Acoustic Strategy Report: It details that a daytime noise survey was undertaken on the site to assess the acoustic performance specifications for glazing and façade construction and to assess the proposed ventilation strategy. The site is in a residential area but is affected by road traffic noise especially along Chislehurst Road and Bickley Road. Due to the background noise levels there will no requirement for enhanced acoustic glazing on the main school building; noise levels are expected to be limited to levels which are compliant to known standards when the proposed ventilation strategy of openable windows is implemented. The sports hall will have natural ventilation methods such as louvered openings and wind catchers and will require minimal attenuation. The noise levels will comply with relevant standards and the impact of noise from the car park and usage of the external areas is expected to be minor adverse in the short term, reducing to negligible in the long term.

Environmental Report: The energy strategy includes energy efficiency measures to minimise the carbon footprint and these measures alone show an improvement to Approved Document (2013) rates of 7%. Further improvements are not feasible within the scope of this development. The strategy has considered the feasibility of a wide range of low and zero technologies. The introduction of PVs is proposed and has the potential to reduce the buildings carbon footprint to a total of 21% below the 2013

requirements. The building has been assessed against the summertime overheating requirements and a combination of increased ventilation rates in summer, night cooling with exposed thermal mass and openable windows all occupied rooms comply with the requirements.

District Heating Strategy: The report outlines strategy for utilising district heating to supply heat to the proposed development and how the strategy meets the requirements of the London Plan. The heating system, its technical design and ground works are proposed to enable future connection to a district heating system if one becomes available.

Summertime Overheating Report: The report details the summertime overheating performance of the proposed development. The building has been designed with openable windows and extensive use of night cooling and solar control glass to reduce summertime temperatures. An evaluation of lifetime weather predications has also been established and mechanical ventilation may be required in the future to some rooms. The report identifies its compliance with London Plan policies and criteria.

Ventilation Statement: The report details what mechanical ventilation provision is proposed to serve the school, including preliminary sizes and locations for all fans and ventilation units and the approach to odour control and noise from ventilation plant. It is proposed that provision of attenuators, acoustic rated casing and silencers, and all plant to run at night 4dB lower than daytime limit will be incorporated into the installation of any external ventilation plant.

External Lighting Statement: The report details the external lighting provision proposed to illuminate the school site, which includes pedestrian walkways, roadways and car parks. Details of the type of lighting and its location on site are submitted. Roads will be illuminated by LED bollard lighting which limits overspill, car parks with 3m LED column lights and pedestrian pathways by bulkhead lights or low level bollard lighting. These will all be controlled via a photo cell to turn the lights on at dusk and turn them off at dawn, all lighting will be turned off at 22.00 until 07.00.

Location

The site is situated off Bickley Road in Bickley, Bromley. The site is designated as Urban Open Space in the Bromley Unitary Development Plan, and currently forms the playing fields and partial sports provision for the existing Bullers Wood Girls School to the north east of the site. The boundary of the adjacent Conservation Area extends along Pines Road to the east. The site sits on a slope with the northern part of the site being 2-3m higher than the southern part.

The site forms an almost triangular parcel of land with Bickley Road, Chislehurst Road and Pines Road bordering the site. To the western boundary of the site is a commercial car dealership garage. To the south eastern corner are a number of large detached dwellings and their respective garden areas which back immediately onto the site. Bickley Road is an 'A'

road (A222) controlled by Transport for London, and Pines Road is a one-way road access from the signalised junction on Bickley Road. The site is situated within PTAL Zone 2-3.

The site is largely grassed or tree covered and all of the trees on the site are covered by a Tree Preservation Order. The boundaries to the site are largely comprised of trees and hedgerow. There is currently a small grass running track, 3 hard surface tennis courts (disused), 6 grass tennis courts (disused) and 3 sports pitches (to be retained) on the site. There are 4 low key buildings on the site which are an Air Training Corps sectional building, a timber sports pavilion and two timber storage sheds. All of these would be demolished as part of the proposal.

Existing vehicular access to the site is from Bickley Road and is formed of an old red brick wall with entrance gates and an original tree lined hard surfaced drive to central hard surfaced areas and an existing track through the trees. There is currently pedestrian access (used by the Girls School) from Pines Road.

The site is surrounded by residential properties to most boundaries and is in a predominantly residential area characterised by large detached and semi-detached dwellings.

Consultations

Comments from Local Residents

Nearby properties were notified and a significant number of representations (approximately 1500) have been received comprising objections and support. The split between the representations received is approximately 25% in objection (predominantly from local residential properties close to the site) and 75% in support (predominantly from prospective parents of the proposed school from a wider area).

In addition, 2 petitions have been received, one in objection and one in support.

Objections:

Objection comments have been received which are summarised as follows (all representations are available on file and have been considered in the production of this report):

- Efforts should be made to minimise environmental impacts and protect trees and wildlife
- Crossings in the area are dangerous for children
- Road safety and increased risk of accidents
- Congestion in the area is already very bad and roads at capacity
- Parking for the girls school is a big problem and there are a lot of car journeys causing road safety concerns

- Local roads will be used for parking
- Existing pavements are too narrow and dangerous
- Entrance should be on Bickley Road which is wider with transport connections
- Scale of development too great
- Detrimental and severe impact on the area and local residential amenities
- Increase in light, pollution, emissions and air quality
- Noise and in the area will increase especially from sports hall and playgrounds
- Site is Urban Open Space and should be protected
- Significant increase in traffic especially at peak times
- Construction traffic will have a major impact and routes are to use quiet residential roads
- Loss of trees, wildlife and greenspace
- Pines Road should become 2 way
- Exiting schools cause anti-social problems
- Site is not suitable for a school and too small for a school of this size
- School will not serve the local community
- This is a residential area
- Previous proposals on the site have been turned down by an Inspector due to the loss of valuable open space and trees and the impact on the character and appearance of the local environment
- More parking on site is required
- Exit onto Bickley Road is unsafe
- Chislehurst Road is too narrow for access and in a dangerous location
- Will affect Conservation Area
- Proposed buildings are not in keeping with the area and contrary of Policy BE1 of the UDP
- It is not possible to create a safe access from either Chislehurst Road or Bickley Road and the application must be refused.
- The conclusions of the revised Transport Assessment show over capacity in all directions indicating the site is not suitable for a school
- The submitted parking stress survey is inaccurate and counts non-existent spaces, it is a high parking stress area not low as being put forward
- A Travel Plan to reduce journeys by 10% is not sufficient or acceptable in an area subject to high congestion levels
- There is no parking for construction workers
- The proposal is premature in advance of the Local Plan process and undemocratic
- Nightingale Lane Adult Education centre would be a better site
- Students will come from outside the local area
- There will be accidents involving children
- The proposed school development will materially harm the site, urban open space and local environment and should be refused
- To improve visibility at the proposed access will result in more trees needing to be removed or cut back reducing screening and further tree loss

- Removing traffic islands for construction vehicles causing further highway safety concerns and more dangers for pedestrians
- Park and stride considerations have not been fully assessed or addressed in the reports
- Natural materials should be used for the buildings
- Public transport is already congested and at capacity
- Existing school sites should be extended
- Damage to area from HGVs
- Local residents will also be affected at evenings and weekends
- Parking controls are required and need to be enforced
- No evidence of other school sites considered
- Documents do not prove a need for a school on this site
- Transport assessment states all junctions will exceed capacity this is not acceptable
- There have already been 3 recent accidents at the junction with Pines Road and Chislehurst Road
- An independent traffic report should be commissioned by the Council
- Loss of existing facilities for the girls school
- Shawfield Road should not be used as a construction route
- Large and ugly building proposed
- School should be sited where it has room to expand with suitable infrastructure
- Too many schools in the area
- The application is misleading
- Playing fields should be protected
- Travel plan is incorrect and will not work in reality, it is not practical
- Construction access should be from the A222
- Pavements in the area are narrow, accidents will occur, these need to be upgraded
- The roads can't cope with another school
- Parking at junctions will cause visibility problems
- Access to residential properties will become a problem
- A crossing will bring traffic to a standstill
- Current traffic levels have not been adequately taken into account
- Illegal parking is already a problem and is dangerous
- Will result in a severe environmental impact affecting everyone
- Why is an unlisted wall being retained at the expense of the wider impact
- Double yellow lines are required
- Where will construction workers park
- Proof of the catchment area is required
- Urban green space should not be used for a school
- The transport report is of poor quality and is misleading in most respects
- Traffic surveys are not complete
- What about the effect on the quality of life for local residents
- 10 drop-off spaces is inadequate

- Parking problems at the girls' school cause major disruption and impact on residents getting to work
- Residents can't cope with more traffic
- Measures to reduce car use won't work
- Early start for children is not appropriate
- There are owls on the site
- All TPO trees should be retained
- Large vehicles will not be able to use mini-roundabouts proving the site is not suitable for this use
- Visibility at existing and proposed junctions is poor
- Not enough space to provide sports facilities for both schools
- Traffic calming will be required due to additional hazards
- There must be a better site available
- Impacts on existing junctions have not been properly considered
- Pedestrian safety, children don't use footpaths
- Traffic reports are inadequate and do not provide enough evidence
- Alternative sites have not been considered including Widmore Centre and the Civic Centre
- Community use is not acceptable - disruption outside school hours
- Existing secondary school are undersubscribed
- Existing schools have room for expansion
- It has not been proven that an access from Bickley Road is 'less preferable'
- Secondary School places are not linked to local catchment areas
- Why has this site been chosen above other sites identified in the local plan process
- The PTAL rating for the site is poor
- Open nature of the site is affected contrary to Policy G8 of the UDP
- School building is out of character in the area and contrary to policies 7.1, 7.4 & 7.6 of the London Plan
- The traffic and access problems associated with this development clearly identify this site is not suitable for a school
- There are only 2 bus routes that could serve the site this is not sufficient
- Additional car movements have been underestimated
- Roads in the area are regularly at a standstill
- Assumptions in the traffic assessment are not correct
- Neighbours were not consulted by the school as stated
- The school building is too close to residential properties (35m at the closest point)
- The development results in the loss of playing fields and is opposed by Sports England and contrary to Policy L6 of the UDP
- The proposed school and site do not comply with EFA basic standards
- The basic play provision standards are not achieved due to the restrictions on this site
- The proposed access is on the narrowest part of the road
- The route through the site will not be used to drop most children off
- The free flow of traffic around the site will be significantly affected

- Development is contrary to policy T18 of the UDP
- Children will congregate outside the school on a busy narrow road
- Signage will be in the direct view of residential properties
- Mitigation of noise for local residents has not been considered
- The building should be sited further away from Chislehurst Road
- Main pedestrian entrance should be from Pines Road which would be safer for pedestrians and the highway.
- The impact of the school development should be spread across the 3 adjoining roads not concentrated on Chislehurst Road
- Additional screening of the school is required
- Construction traffic should only enter from Bickley Road for safety reasons
- Questions raised over the need for a new school and in particular a boys school
- Bickley already has 9 schools in close proximity
- Proposed screening will not exist in the winter months
- Detrimental impact on privacy for nearby residential properties.
- The transport assessment confirms that Bickley Road has capacity but Chislehurst Road does not, why is the proposed access on Chislehurst Road
- No proper pavement for school children is being proposed in Chislehurst Road this is dangerous and unsafe
- Why is development concentrated in the northern part of the site, this has not been justified, why can't it be sited further south/more centrally within the site
- The Transport Assessment and its findings include a number of errors
- The school building will be overbearing for local residents
- The justification for educational need in the Borough is not correct
- Other site sites are preferable more suitable, this application is premature
- The site selection report submitted provides no comparison or assessment and its use is extremely limited
- Justification required by the Mayor of London has not been provided
- Bickley is in an area of open space deficiency and is an important local amenity space
- The disused tennis courts are used for football and rugby training
- The proposed sport pitch provision is inadequate for both schools
- Evening community uses will have a further impact on local residential amenity including additional cars, noise and lighting.
- Existing school places should be filled and unpopular schools made attractive with investment
- How can a school advertise places when it doesn't have planning permission
- Education provision in Bromley should be reviewed
- Public money should not be used to build a school which is not needed
- There are existing unfilled spaces in Bromley schools
- Estimates of the need for school places should be reassessed
- St Hughes Playing field was ranked a Group 4 B site and there are clearly other sites that are more suitable as identified in the Local Plan.

A petition with 702 signatures has been submitted objecting to the development on the grounds of increased traffic, parking difficulties, road safety issues, loss of playing fields and development on open space.

An Independent Traffic Report has also been commissioned and submitted by local residents and undertaken by Odyssey Markides. This has also been updated and revised following the revisions to the Transport Assessment. The report reviews the findings of the Transport Assessment and Construction Management Plan and highlights the highway impacts associated with the proposed development. It considers the local highway network, network capacity, parking, proposed access arrangements, traffic flow figures and ARCADY data and the construction traffic management plan including additional information submitted by the applicants. These reports conclude:

- The surrounding highway network is already operating significantly in excess of capacity with significant amounts of queues and the introduction of such a large trip attracting land use will compromise the operation of the local road network. No mitigation to address this has been proposed.
- In order to avoid queuing through the site via the one-way access arrangement, parents dropping off/collecting pupils will likely resort to waiting on Chislehurst Road and other local residential roads as opposed to using the one-way system resulting in reduced road safety and exaggerating congestion along Chislehurst Road.
- Increased levels of parking on private roads with residents liable for increased repairs
- Existing and proposed pedestrian facilities on Chislehurst Road are contrary to standards as they are not of sufficient width to accommodate the anticipated increase in footfall. This combined with increases in traffic volumes could lead to increased road safety concerns as pupils attempt to cross the road.
- The Stage 1 Road Safety Audit raises a range of serious highway safety concerns in relation to the schools proposed access arrangement.
- No assessment as to the catchments area of pupils and associated pedestrian/cycle routes has been provided or how these additional trips will be accommodated.
- The CMP provides an inadequate amount of detail and swept paths conclude that larger vehicles will not be able to manoeuvre onto Chislehurst Road. These will prejudice the safety and operation of the surrounding highway network.
- Consistent errors are present throughout the traffic flow figures which are used as the foundation for the junction capacity analysis. The traffic flow figures do not combine the various traffic scenarios correctly which results in an underestimate of the impacts of the development, particularly on Bickley, Chislehurst and Widmore Road roundabout which is already operating in excess of its capacity. Therefore the junction capacity analysis based on these figures is not fit for purpose.

- The significant variation of the results published in both versions of the TA and the sensitivity of the highway network, it is considered that the method of assessing junctions in isolation does not represent a sufficient nor credible analysis. As such, an alternative analysis model should be used to more accurately measure the impact of this development.
- A suitable construction route strategy has still not been established suggesting there is not a suitable route to accommodate construction vehicle access to the site.
- Given the existing stress on the junctions within the immediate vicinity of the site, the site is not suitable to accommodate the peak hour quantum of additional traffic associated with the proposed land use.
- The proposals will prejudice the operation and safety of the surrounding highway network which is contrary to the NPPF (2012) and should be refused on highway grounds.

A letter from Bromley Borough Road Safety Panel raising concerns has been submitted and identifies in summary that:

Adequate vehicle arrangements for the site are required to prevent traffic and road safety problems on the surrounding roads and also adequate on-site parking to prevent excess parking on public roads. On-site drop-off/pick-up point is welcomed but more parents will drop off on Chislehurst Road creating hold-ups. Chislehurst Road should be widened for a section to provide a layby for drop-off or create an additional internal road. On-site parking appears adequate for staff only with little scope for large groups of visitors. The internal road should be widened to create additional parking space along its entire length, minimising on street parking and congestion.

Chislehurst Society have also submitted an objection to the proposal stating: the D&A presented a very good heritage appraisal of the school buildings and site, but this appears to have little connection to the proposed design for the building which is a disappointing and mundane solution to the need for additional space.

Sundridge Residents Association has also written a letter of objection which is summarised as follows:

- There is no clear indication that a secondary school is required in this location.
- Loss of sports facilities from Bullers Wood Girls School and their intensive shared use with a Boys school cannot be a popular option.
- The single school building is clearly inadequate other than as an opening solution to a Government Directive to find space for a school. The design concept is cramped and ill conceived. The site is inappropriate.
- Where will the missing facilities be put? Valuable urban open space would soon evaporate.
- The proposal will increase traffic congestion and hazard in a location which is already at saturation point.

- It will impose related parking and drop-off and pick up activities in adjacent residential locations seriously eroding residential character
- We would urge therefore that the additional implications and consequences of this development are fully considered.
- We would urge that consideration is given to finding a more suitable larger site elsewhere with better access facilities.

Support

Letters of support have been received which are summarised as follows:

- Government supports additional schools and policies encourage education provision. This proposal accords with government policy.
- Serious lack of school places and choice especially for boys
- Boys school is much needed and a great opportunity in Bromley
- Not enough Secondary School places in the Borough
- Traffic and congestion will be limited
- Parents consider moving away to get secondary school places
- Only option for local area and parents
- Boys currently have to travel across the Borough
- Children can walk to school rather than be driven across the Borough
- Design is well considered and minimal visual impact
- Continued development will only increase the pressure on schools
- Environmental and infrastructure issues have been well considered
- This is in partnership with the Girls School and will complement it
- The demand is high locally - boys will walk or get the bus
- Staggered school hours have addressed traffic concerns
- Trees are retained and new tree planting is proposed
- Extra amenities and school places are required
- Need within the local community
- Such a school would be welcome in the Borough
- Schools should be available locally and in walking distance
- More desirable location to live in
- Schools are oversubscribed – a number already have ‘bulge’ classes
- The EFA have approved the site
- Bullers Wood Girls is a highly rated school
- Children will be able to walk or get a bus to school
- The site is already used by a school
- Meets educational needs of local children which are only going to increase
- Where else will a school go
- Lack of local schools increases congestion and traffic
- The efforts made to limit its effects on the environment and local residents are considerable
- The land is currently underused
- Last year there were 480 applicants for 180 places.
- Will relieve capacity issues at existing schools
- The proposed road system reduces congestion

- Can only benefit the local area
- Fits into its surroundings
- The site already has buildings on it
- Children will be able to walk to school
- Understand neighbours' concerns but these have been addressed
- Low key impact of the building
- There is a need for excellent facilities for boys in Bromley
- Better than housing on the site
- This is a great opportunity for Bromley and its education provision and choice
- Management is already in place at the Girls School
- Excellent choice of site
- Applicants have gone to great lengths to minimise traffic impact
- The new school proposes different start and finish times to avoid congestion
- Objectors have no personal need for the school
- Demand for a single sex boys school
- More housing needs more schools and education is crucial
- This should be approved for the wider community and its benefits for education
- Boys should have the same choices and education experiences as girls within the Borough
- The proposals should be supported and welcomed.

A petition with 782 signatures has been submitted in support of the application for a new school on the grounds of the need to show support from prospective parents for the school and to show the demand and difficulty in getting secondary school places.

Comments from Consultees

Highway Authority:

“Construction Management Plan: One issue with the construction phase is large vehicles being unable to use the Chislehurst Road / Bickley Road roundabout. Removing the islands here for a significant period of time would not be acceptable. The possible alternative for the vehicles to use Shawfield Park has raised a number of complaints. It would be helpful if more details could be given about the numbers of vehicles that cannot use the existing roundabout and over what period of time they are likely to need to access the site. It may be possible to look to remove the islands for short periods, particularly if alternative arrangements can be made.

An alternative would be to use a new access from Bickley Road as the construction access. There will need to be a restriction on vehicle movements during the peak hours but it should overcome these problems. I think a scheme should be drawn up to compare with the Chislehurst Road option to see what the impacts will be. There needs to be parking on-site for construction workers which was mentioned in the meeting but not referred to previously.

Construction period: In addition to the parking on site for the site workers, there also needs to be delivery / turning areas on site for the delivery vehicles. If there are large numbers of vehicles arriving per day during some periods of the construction phase there needs to be a system in place to ensure vehicles do not have to queue on the highway.

There would be no parking on site for parents during this phase. Parking on Bickley Road, the nearest available, is likely to cause interference to the free flow of traffic and congestion.

Access arrangements: The proposal is for the main access to be from Chislehurst Rd with the exit to Bickley Road. This has some merit in that it does spread any impact between the 2 roads. However, the Chislehurst access has raised a number of objections and issues were raised in the Road Safety Audit. As with the construction phase an alternative scheme(s) should be drawn up to see what the impacts would be on providing the access only from Bickley Road.

Full operation: There was a Road Safety Audit carried out on the proposed Chislehurst Road access. This should ideally have covered the other accesses in Bickley Road and any other highway works. The main issues raised were visibility splays, parking at the access, swept paths and the lack of footway. The visibility splays will require the removal of trees and vegetation and regular maintenance. I am not sure that I agree with the designer's response to items 3.1.3 or 3.4.1. There could be "School Keep Clear" markings provided but yellow lines have limited effect around schools unless a traffic warden is continually present.

Crossing Bickley Road in the vicinity of the school is a serious concern. There are options but if a pelican [crossing] is being proposed it needs to be justified, designed, safety audited, TfL's views sought etc. TfL raised the issue of bus overcrowding and suggested staggered timings with the Girls' School. Details are needed of how this being taken forward. Can coaches go into the site?

There is no mention of use of the Sports Hall. Depending on the type of use/events there could be overspill parking on Chislehurst Road. A more detailed assessment needs to be included.

A fundamental issue would be whether parents go onto the site to pick up /drop off pupils. This could depend on a number of factors, such as parent's routing. However, is there enough waiting space for the number of vehicles forecast? Will the length of time drivers take to go through and exit the site deter them from going in?

Trip generation /modal split / assignment: The modal split is from the Girls' school and the distribution from the pupil applications. Does the distribution correspond with the Girls' school? The number of vehicular trips has been reduced using various assumptions – siblings, use of Travel Plan etc but the modal split would already have taken these into account. Table 6-4 needs to

be expanded to show the working. Table 6-8 Local assignment – is that correct?

Junction modelling: Linsig - There were no issues with the overall construction of the model and all the stages/intergreen timings etc all matched with the timing sheet and all the flows were balanced.

However the following data was not gathered;

- Lane balancing - entry lane balancing was used within the model. However when traffic has the choice of two upstream lanes, the majority of flow was placed on one lane. For eg from Zone A to Zone C – 7 vehicles are placed in Lane 2 and 538 in Lane 2 – when in reality this would probably be more balanced.*
- Saturation flows – in the model the sat flows used were those calculated by the programme based on the geometric information. The saturation flows should have been collected on site during peak periods.*
- Cruise times – the default value was used in the model. These should have been collected on site also.*
- Signal timings – some stages are demand dependent - no evidence was provided of this data from TfL on the demand dependent stages (how often and for how long they are called) to be input into the model. Average signal timings should have been gathered on site and a spreadsheet with this information provided. All timings were running at max – which may not actually always be the case on site.*
- No validation results were provided – a comparison of degree of saturation values from the model results with those calculated from on-site measurements and no evidence of queue length survey results for comparison with the queues from the modelling. This is required to show that the model represents what is actually happening on site and is a TfL requirement.*

Other issues noted with the traffic flow diagrams;

- Although probably just a typing error – no flows were shown entering the site on any of the flow diagrams. The volume of traffic leaving the site on the flow diagrams did not match that contained in the 'in/out' box.*

Arcady - The modelling showed significant over capacity of the junction. There were no surveyed queue lengths provided. Given Arcady may be unreliable once the junction goes over capacity it is difficult to say how much reliance can be placed on the results.”

Revised Highway Comments (following submission of further information):

“The site is located in the triangle of land surrounded by Bickley Road, a London Distributor Route and part of the A222, Chislehurst Road, a Local Distributor and part of the B264 and Pines Road. There is an existing vehicular access from Bickley Road and there is also a pedestrian access in Pines Road

The proposal is for a new secondary school for 900 pupils with 64 FTE staff. A number of documents relating to the potential highway impact of the

proposals including a Transport Assessment (TA), a stage 1 Road Safety Audit and a Construction Management plan were included with the application. These have been updated as the application has progressed.

Construction Management Plan: A CMP was supplied with the application. The proposal is to use the new Chislehurst Road access for construction traffic. The construction of the main school will take place while the first year intake (180 pupils) is on site. There will be 10 parking spaces for parent's drop off and pick up and 9 spaces for school staff accessed from Bickley Road. Site staff will park on the northern side of the site using the Chislehurst Road access. Although turning and parking areas are shown there do not appear to be any areas for material storage.

The approach / egress from the site is restricted by a number of existing features:

- Network Rail bridge that crosses the A222 @ Summer Hill – Height restriction 4.40m;
- Network Rail bridge that crosses the B264 @ Old Hill – Height restriction 3.80m;
- Single Access Point into the Playing Fields / Widmore House grounds – Width restriction 3.50m;
- Existing Access road serving Playing Fields / Widmore House grounds potentially unsuitable for heavy goods; and
- A222 / B264 roundabout junction at Widmore Road restricted access for vehicles heading north bound that need to turn right (“hairpin” bend that inhibits the turning circle of longer wheel base vehicles).

Options were looked at for a construction vehicle access from Bickley Road. However, these were discounted due to health and safety concerns because of the potential of conflict between the pupils and construction traffic, the works that would be needed to the internal road layout and the potential for disruption to the flow of traffic on Bickley Road.

In order to allow large vehicles to use the Chislehurst Rd / Bickley Road roundabout, turning to/from Widmore Road and Chislehurst Road, the traffic islands at the roundabout would have to be removed. The timescale given for this was up to 18 months. The islands are used by pedestrians, including pupils from Buller's Wood School for Girls, to cross the roads and they also control the deflection of vehicles around the roundabout. Removal of the islands for that period of time would not be acceptable. An alternative would be to route large vehicles around Shawfield Park. This is likely to require waiting restrictions at the junction with Chislehurst Road.

The CMP concludes that full details about the construction programme and vehicle routing will be discussed between Kier, Transport for London and LBB and secured by condition. This leaves the various issues unresolved.

Temporary Accommodation: A prefabricated building will be placed on the southern car park for a year to accommodate the first year intake of 180 pupils and 10 FTE staff while the main school is built. A total of 10 parent drop off

spaces will be provided during the construction period. A further 9 spaces will be provided for the staff and visitors. The access from Bickley Road is only wide enough for one vehicle and it is not clear how this will work during drop off and pick up periods.

In order to estimate the modal split, the travel survey data from the existing staff and pupils at the Girls School was used and the following table was given in the TA. The data from the Girls School would include siblings sharing so the figures for car sharing may be on the high side for a one year intake.

Mode	Pupils (180)		Staff (10)		Total
	%	Number	%	Number	
Car	15%	27	70%	7	34
Car share	10%	18	4%	0	18
Park & Stride	6%	11	3%	0	11
Rail	16%	29	7%	1	30
Bus	24%	43	1%	0	43
Cycle	0%	0	4%	0	0
Walk	28%	51	12%	1	52
Total	100%	180	100%	10	190

Proposed Development:

Access arrangements: A new access is proposed from Chislehurst Road. The existing access on Bickley Road is being retained as the exit for light vehicles. Service vehicles will enter and exit via Chislehurst Road. A new pedestrian access is also proposed from Bickley Road.

There is currently no footway along the south side of Chislehurst Road. A pedestrian access point is being provided adjacent to the vehicle access and sightlines are being provided by cutting back the existing vegetation.

On-site parking: Two areas of parking are proposed on the site. One car park for 11 vehicles, including 5 disabled spaces, is to the north of the site by the proposed Sports Hall. The main car park is in the south west of the site with provision for 58 vehicles. There is also a drop off / pick up bay for 10 vehicles on the northern edge of the main car park. A turning area is provided at the end of the car park. Coaches will not enter the site and it is suggested they will use the nearby bus stops. Although coaches can pick up and drop off passengers at bus stops they cannot wait there.

Cycle parking: A total of 18 Sheffield stands will be provided on the site, giving provision for 36 cycles. It was noted that surveys at Bullers Wood Girls School showed no pupils and 4% of staff currently cycle. Based on that, 7 cycle stands would be required for this site. There is space on site to provide more parking facilities if required.

Delivery and servicing: Servicing and deliveries to the site will take place from the new vehicular access on Chislehurst Road. All delivery and servicing

vehicles can turn on site and leave via the same access. Swept paths were provided for a large refuse collection vehicle.

Parking surveys: Parking stress surveys were carried out in roads within an approx. 400m walk distance of the site in May 2016. These were between 0700-1000 and 1430-1830 at 30 minute intervals. They showed that there were a large number of spaces available throughout the survey periods. However, a lot of the spaces are on roads such as Bickley Road and Chislehurst Road, the closest to the site accesses, where parking is likely to cause interference with traffic flows. The nearest roads such as Pines Road and Shawfield Park where parking could reasonably be accommodated are already heavily parked.

Main School Development: Again, applying the existing modal splits from the Girls School to the proposed Boys school would give the following results for the full school operation:

Mode	Pupils (900)		Staff (64)		Total
	%	Number	%	Number	
Car	15%	137	70%	45	182
Car share	10%	90	4%	2	92
Park & Stride	6%	53	3%	2	55
Rail	16%	147	7%	5	152
Bus	24%	217	1%	1	218
Cycle	0%	0	4%	2	2
Walk	28%	254	12%	8	262
Total	100%	900	100%	64	964

The TA then argues that this does not consider the effect of siblings sharing which would reduce the car trips by 5% and the effect of the School Travel plan which would reduce trips by 10%. However, this seems ambitious particularly given the modal split is taken from a school with a Travel Plan in place and where there would be siblings present.

Travel Plan: If the School should gain permission a School Travel Plan would be required which I assume can be conditioned.

Sports Hall – Out of hours community use

The hall has the potential to be open and operational after school opening hours and at the weekend. The TA indicates that it is intended the activities could include sports, health/community groups and educational related activities and not for social uses such as weddings and parties. The traffic would route as per the school, vehicles would enter via Chislehurst Road and exit onto Bickley Road. Parking on the site would accommodate 68 cars and in the event parking demand exceeds that, for example parents evenings, the two games courts will be open and accommodate up to 80 additional cars. This will require marshalling to ensure that level of parking can be achieved.

Junction Modelling

The 3 junctions at the corners of the site have been subject to modelling to demonstrate the effect of the additional school traffic. The surveys show that the junctions are working close to or over capacity at present.

The roundabout junction of Bickley Road and Chislehurst Road is overcapacity at present. There are substantial queues on Chislehurst Road in the AM peak. The computer model, ARCADY, is generally accepted as becoming unreliable once the junction goes over capacity and so it is unclear how much weight can be given to the results. There are other anomalies with the traffic flow diagrams shown in the TA. If the numbers input to the models are lower than those surveyed the results will underestimate the situation.

Given it is close to capacity, the highway network is obviously very sensitive to increases in traffic flows. As the junctions are likely to interact, together with the introduction of a signalised crossing on Bickley Road, there is a question whether the modelling will give a good indication of the existing and proposed situations. The additional school flows will only make the situation worse but, from the modelling presented in the TA, it is difficult to assess the level of the impact.

Impacts from the Development

The assumption that goes with the layout and access arrangements is that parents will drive into the site to drop off and pick up children. However, there are only 10 short term parking bays provided which is well below the estimate of 137 cars. There is space within the site on the access road for vehicles to queue but much of this is single track and so vehicles will be unable to overtake should a car in front be delayed for any reason. Although there is an estimate in the TA of how long it takes to drive through the site there is no assessment of how long it will take to exit onto Bickley Road. This is likely to be an issue given the amount of traffic on Bickley Road, particularly in the afternoon, when a large number of vehicles will be trying to leave the site at the same time.

This means that it is highly likely that parents will park and wait on nearby roads to avoid going through the site. The two nearest roads to the site, Chislehurst Road and Bickley Road, are likely to be the most attractive and parking here will interfere with the free flow of traffic. Chislehurst Road already has queuing from the mini roundabout going past the proposed access and this will only exacerbate the situation.

Waiting restrictions are unlikely to deter such parking unless there is a Traffic Warden present.

Chislehurst Road access

The Stage 1 Road Safety Audit raised a number of issues with the access. There is no footway present and so the visibility splays, both for vehicles and pedestrians exiting the site, rely on the vegetation being cut back. A crossing point is proposed, rather than a footway, and so there is unlikely to be sufficient width to cope with the people trying to use it. The advice in Manual for Streets is that footway widths in excess of 2m should be considered for areas around schools. If parents are dropping off children on this side of the

road they will end up walking in the road to the entrance. If they cross the road, the footway on the northern side is substandard. In the morning peak the pupils heading towards Bullers Wood School for Girls already take up the footway for periods of time.

Public transport use

Trains: There are 147 pupils estimated to use the train. The footway from Bickley station along Southborough Road towards Bickley Road is relatively narrow. In the morning peak pupils will be going against the flow of commuters going towards the station and people will step into the road. The carriageway is also relatively narrow so they will be in conflict with vehicles.

Buses

There are over 200 pupils estimated to come to the school by bus. There are 2 bus stops in proximity to the Bickley Road access. However, there is no nearby crossing point and, given the level of traffic flow, some form of crossing would be needed to get pupils across the road. A puffin crossing has been proposed to allow people to cross Bickley Road. If this is to be taken forward it will need to be secured via a s278 or s106 agreement. Alternatives would have been a traffic island or a zebra crossing. There is no indication an assessment was made of the alternatives. The island would be required to be of a suitable size to accommodate a relatively large number of people at one time. Given the road width there would need to be localised road widening which would mean land take from the school site.

The bus stop by the access in Bickley Road will need to be moved to accommodate the crossing. TfL have agreed to the principle of this.

TfL's initial response indicated that, given the number of pupils, there will be constraints on the local bus services (routes 162 and 269). Pressure on these services could be relieved if the school start and finish times are staggered with the nearby Bullers Wood School for Girls. Failure to do so would require mitigation to meet the demand for bus travel. The Boys School would start at 07:45 and end at 15:20, the Girls School would start at 08:25 and finish at 15:10. TfL have accepted this but there does not appear to be much of a difference given the additional distance to the Girl's School from the bus stops on Bickley Road.

Coaches will not be able to enter the site and it is suggested they will use the nearby bus stops. Although coaches can pick up and drop off passengers at bus stops they cannot wait there.

Conclusions:

There will be an impact during the construction period but the routing of large vehicles has not been determined. The local highway network is operating at or close to capacity and the traffic generated from the proposed school will only add to the sometimes substantial delays on the network.

Parents are likely to avoid going through the site due to the delays involved and will drop off and pick up pupils on the surrounding road network, in particular Chislehurst Road and Bickley Road.

The proposed access on Chislehurst Road has sub-standard pedestrian facilities. The items raised in the Stage 1 Road Safety Audit were not suitably addressed.

Consequently I would recommend refusal of the application due to the potential detrimental effect on road safety and free flow of traffic being contrary to policy T18 of the UDP 2006.”

Transport for London (TfL):

“Please note that these comments represent an officer level view from Transport for London and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this project. These comments also do not necessarily represent the views of the Greater London Authority, which should be consulted separately.

Site Context *The site is located within a parcel of land that is bound by the A222 Bickley Road to the south, Chislehurst Road to the west and Pines Road to the east. The Public Transport Accessibility Level (PTAL) ranges between 2 and 3 for the site which is considered average to poor accessibility. Bus stops are located on the A222 Bickley Road where access to two bus services can be achieved and Bickley Station lies approximately 650 metres to the southeast.*

Vehicle Access and Trip Generation *The main access to the site is proposed to be provided from Chislehurst Road to the north west of the site. This will form an ‘in only’ vehicle access, with vehicles then routing through the site and exiting onto the A222 Bickley Road. TfL considers the approach to trip generation and modal split acceptable and in line with London Plan Policy 6.3. Given that the site is not within close proximity to the Transport for London Road Network (TLRN) it is unlikely that the proposed development would result in an unacceptable impact to the TLRN.*

Car Parking *A total of 69 car parking spaces are proposed including 5 disabled parking spaces. A drop off / pick up bay is also proposed within the site to accommodate around 10 vehicles. The School Travel Plan should encourage use of more sustainable travel modes to reduce the amount of travel by car in line with London Plan policy 6.3. The applicant should also consider the inclusion of Electric Vehicle Charging Points (EVCPs) and a provision of 20% active EVCPs plus 10% passive EVCPs is recommended.*

Cycle Parking *A total of 36 cycle parking spaces are proposed which is less than the minimum standards set out in the London Plan. TfL requests that the number of spaces be increased to 129 spaces in line with required standards.*

Buses *As agreed with TfL in principle, the applicant seeks to relocate the existing bus stop (number 19745) and shelter (number 0106/1179) on the northern side of the A222 Bickley Road to a location around 40 metres to the east. The bus stop on the southern side of the carriageway (number 19744)*

and shelter (number 0106/1203) would remain in its current location. It has been requested by TfL that the bus shelter on the southern side of the A222 will be increased from a 2 bay to a 3 bay to meet the likely demand.

The highway works associated with the bus stop relocation and shelter upgrade will need to be confirmed via a detailed design process which should be secured via an appropriate condition or planning obligation in consultation with TfL. Furthermore the applicant is aware that they will be responsible for all costs associated with the works and again this should be secured by a condition.

TfL have considered the likely impact on bus capacity and it is noted that given the number of pupils proposed there would be some constraint on the local bus services (routes 162 and 269). Pressure on these services could however be relieved should the school ensure arrival and departure times are staggered with the nearby Bullers Wood School for Girls.

Failure to do so will require mitigation to meet the demand for bus travel in line with London Plan policy 6.7. This should be included as part of the School Travel Plan and secured by condition. It should be noted that the method of providing contributions towards bus network enhancements is currently subject to government advice. There is a limited settlement to TfL from the government to fund bus network improvements for free schools/academies. Should mitigation with regard to bus contributions be required the level of mitigation will need to be agreed with TfL.

Travel Plan TfL welcomes the provision of a draft School Travel Plan which sets out relevant aims and objectives to encourage sustainable travel. Involvement in the TfL school travel planning accreditation scheme (STARS) is encouraged and the Travel Plan should be regularly updated and monitored to ensure compliance with London Plan policy 6.11. A commitment to updating, monitoring and funding the travel plan and associated measures should be secured as part of any planning permission. As identified above measures to minimise impact on buses including staggering start times should be provided.

Community Infrastructure Levy (CIL) It is noted that the proposed secondary school use would be exempt from the Mayoral CIL.

Summary In summary, TfL confirms that the proposed development would be unlikely to result in an unacceptable impact to the TLRN; however given that a number of the pupils would be expected to travel by bus the arrival and departure times of the proposed school should be staggered with surrounding schools to alleviate the likely impact on bus capacity. Further discussions regarding the detailed design of the bus stops and shelters located on Bickley Road should be held between the applicant and TfL, electric vehicle charging points should be delivered, the level of cycle parking should be increased and the School Travel Plan will need to be updated and monitored to ensure consistency with London Plan policy.”

Revised comments:

“TfL provided initial comments which should be read in conjunction with the following comments:

The proposals comprise the development of a new secondary school to accommodate 900 pupils, supported by 64 staff. The site is allocated in Bromley Council’s draft Local Plan (November 2016) for education, to meet future demand for secondary school places. TfL is currently providing comments to Bromley Council with respect to the Local Plan policy.

The layout of the development includes an entrance to the site from Chislehurst Road and an exit only onto Bickley Road in the location of the existing site access. This would require moving the existing eastbound bus stop approximately 40 metres to the east of its current location to improve visibility from the junction. TfL has accepted that the existing east bound bus stop (number 19745) and shelter (number 0106/1179) can be relocated no more than 40 metres to the east. The west bound bus stop (number 19744) will be retained in its current location.

TfL welcomes the proposed staggered arrival and departure times which was requested to alleviate demand on existing bus services at peak times. This should be secured by an appropriate planning condition.

To consider future demand for bus services, TfL has requested that funding is secured to increase the size of the existing west bound bus stop (number 19744) and shelter (number 0106/1203) from a 2 bay to a 3 bay facility. The highway works associated with the relocation of the east bound bus stop, increase in the size of the west bound stop and shelter upgrades will be confirmed through the detailed design process which should be secured via an appropriate planning condition or obligation in consultation with TfL. The applicant will be responsible for all costs associated with the works.

TfL welcomes the proposal to provide puffin crossing facilities on Bickley Road. Details will need to be confirmed via the detailed design process which should ensure that there will be no conflict with bus movements which could result in road safety concerns.

There is no change to the proposed on-site car parking provision. TfL considers the proposed parking provision to be high and the School Travel Plan should aim to significantly reduce car trips in favour of active travel. TfL welcomes the commitment to provide two Electric Vehicle Charging Points (EVCPs).

The plans demonstrate that a total of 129 cycle parking spaces can be accommodated within the site, although 36 spaces will be provided on opening of the school. TfL confirms this approach to be acceptable provided that the space designated for future cycle parking provision is safeguarded and that this is monitored through the travel plan. This should be secured by a planning condition.

TfL welcomes the commitment from the school to participate in TFL's STARS accreditation scheme and the target to achieve bronze accreditation by June 2018 and silver accreditation the following year.

The provision of a Construction Management Plan (CMP) is welcomed and the applicant should ensure that no construction related deliveries will be undertaken during the peak periods (08:00-09:00 and 16:30-18:00). It is imperative that road safety measures are considered and preventative measures delivered through the construction and operational phases of the development and TfL encourages the use of contractors who are registered on the FORS system.

Subject to the above conditions being met, the proposal as it stands would not result in an unacceptable impact in strategic transport terms."

Sport England:

"It is understood that the site forms part of, or constitutes a playing field, or prejudices the use of a playing field, as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). The consultation with Sport England is therefore a statutory requirement. Sport England has considered the application in light of the National Planning Policy Framework (particularly Para 74) and Sport England's Playing Fields Policy.

Sport England's policy is to oppose the granting of planning permission for any development affecting playing field land unless it meets with one or more of the five exceptions stated in its policy. The proposed development would appear to be sited on an existing area of playing field. Locating this aspect of the proposed development on the existing playing field would prejudice the use of the playing field.

*In light of the above, Sport England **objects** to the application because it is not considered to accord with any of the exceptions to Sport England's Playing Fields Policy or with Paragraph 74 of the NPPF.*

Should your Council be minded to grant planning permission for the development then in accordance with The Town and Country Planning (Consultation) (England) Direction 2009, the application should be referred to the Secretary of State, via the National Planning Casework Unit."

Second comments following the submission of additional information:

"Further to Sport England's consultation response dated 09th August 2016 and subsequent response dated 31st August 2016, unfortunately Sport England is of the view that no new information has been provided and that all relevant considerations set out in the email and attached document recently provided were taken into account within Sport England's formal consultation response dated 9th August 2016. For the avoidance of doubt, this proposal does not meet exception E1 of Sport England's Playing Fields Policy as Bromley do not have a robust and up to date playing pitch strategy in place.

Sport England's statutory objection is on the basis of a loss of part of the overall playing field area (in physical and functional terms), which includes the area to the south east of the trees which has been marked out for playing pitches in the last five years and the area to the north east which currently is not marked out for pitches. Therefore, Sport England classifies the area to the north east of the trees as part of the whole area of playing field, unless the applicant provides a legal opinion to demonstrate otherwise. Notwithstanding this, there is evidence of mobile football goals on the right rectangular fenced area to the north west of the trees. Furthermore, the bin store and sub-station are proposed to be built on the part of the playing field which currently contains a football pitch (as illustrated on the Existing Sport Pitch Provision – Winter plan). An addition, as I am sure the Council will be aware, the St Hugh's Playing Fields are currently designated as Urban Open Space. A potential way forward would be to propose a replacement playing field or playing fields in line with policy exception E4 of Sport England's Playing Fields Policy.

Sport England therefore maintains its objection to this planning application. Should your Council be minded to grant planning permission for the development then in accordance with The Town and Country Planning (Consultation) (England) Direction 2009, the application should be referred to the Secretary of State, via the National Planning Casework Unit.

However, Sport England would be happy to review its position if it can be demonstrated that Sport England's Playing Fields Policy can be met. A potential way forward would be to propose a community size 4 court sports hall (34.5 x 20m) and position the proposed MUGAs side by side and fence them (sports lighting should also be considered). This would provide more capacity they would constitute formal sports facilities. Sport England would then assess this proposal against E5 of Sport England's Playing Fields Policy.

Please note that Sport England has assessed the application and commented accordingly and it is our view that this application does not comply with Sport England's Policy."

Third comments following the submission of additional information:

"Further to Sport England's consultation response dated 09th August 2016 and subsequent responses dated 31st August 2016 and 23rd September 2016, unfortunately Sport England is of the view that no new information has been provided and that all relevant considerations set out in the email and attached document recently provided were taken into account within Sport England's formal consultation response dated 9th August 2016.

Sport England therefore maintains its objection to this planning application.

Should your Council be minded to grant planning permission for the development then in accordance with The Town and Country Planning (Consultation) (England) Direction 2009, the application should be referred to the Secretary of State, via the National Planning Casework Unit.

If the Council are minded to approve this application, Sport England would recommend that the following condition is attached to the decision notice:

Use of the development shall not commence until a community use agreement prepared in consultation with Sport England has been submitted to and approved in writing by the Local Planning Authority, and a copy of the completed approved agreement has been provided to the Local Planning Authority. The agreement shall apply to the sports hall, changing rooms and remaining playing field and include details of pricing policy, hours of use, access by non-educational establishment users, management responsibilities and a mechanism for review [, and anything else which the Local Planning Authority in consultation with Sport England considers necessary in order to secure the effective community use of the facility]. The development shall not be used at any time other than in strict compliance with the approved agreement.

Reason: To secure well managed safe community access to the sports facility, to ensure sufficient benefit to the development of sport.

Informative: Guidance on preparing Community Use Agreements is available from Sport England www.sportengland.org.”

Environmental Health:

Contamination: *“The Phase 2 finds some elevated hydrocarbon levels and full ground gas results are still awaited. Contamination will not be a bar to the development but some further work is needed. A K09 condition should be attached.”*

Noise: *“The Planning statement recognizes the potential for an amenity impact from noise but states ‘it is not considered that the increase in people using this site and the activities associated with operation of the new school building will give rise to unacceptable disturbance...’. There is an ‘Acoustic Strategy Report’ which deals with Building Regulations \ BB93 compliance but I could not find any acoustic assessment to evidence this statement or to properly detail acoustic impact of the proposal on surrounding residents. There will be noise impacts from external games \ PE and playgrounds. I appreciate the current use is as a playing field but it appears to be little used with parts not used at all and this will be a very large intensification of use up to 900 pupils and 64 staff. There will also be noise from external traffic movements on site from the 68 vehicle car park and traffic from drop off and pick up vehicle movements. The impact is likely to be adverse on some residents. Whilst the adverse impact may ultimately be balanced against the benefits of the proposal I would suggest that we request an acoustic assessment to examine these points and cover reasonable mitigations.*

In respect of plant noise the documents state that the ventilation system will comply with certain standards but we would expect a full BS4142 assessment. This could be covered by an appropriately worded condition.”

Extraction\ Ventilation: *“No odour abatement plant is proposed but given the use, location, and high level high velocity discharge, this is considered to be reasonable in this case. Noise would be covered by the plant noise condition.”*

Lighting: *“It will be possible to ensure reasonable residential amenity in respect of lighting however there will inevitably be some lighting impact on neighbouring properties as the existing situation is a dark field. A Lighting Statement document is included which is fine as far as it goes. I would suggest we still attach a condition for submission of final lighting details and including full lighting spread plans (which are omitted from the submitted document). My understanding is that no floodlighting is planned for fields.”*

Air Quality: *“The site is outside although fairly close to an AQMA. The Air Quality assessment finds that the impact of the development on the local area is not significant and the exposure of the site to poor air quality is also below acceptable limits. I would recommend that conditions relating to electric car charging points, non-road mobile machinery and the submission of a construction management plan are attached to mitigate and minimise impact as far as is reasonably practical.”*

Additional comments following submission of further information:

“I have reviewed the additional information and have the following additional comments:

Contamination: *I am now satisfied no condition is necessary however I would request that an appropriate informative is attached to any permission:*

Noise: *Comments noted. I will await updated report. Please ensure the report covers mitigation as per NPPF p.123 requirement to ‘mitigate and reduce to a minimum other adverse effects..’. In most cases where an impact is adverse but not significantly so we would expect mitigations like acoustic fencing, behavioural controls, controls on hours of use of playing fields etc.*

Lighting: *Comments noted. I will await updated plans. If final plans submitted in advance then we would have no need for a condition.*

Air Quality: *This covers air quality mitigation which is not included in the Traffic Management Plan. Whilst the attached may be suitable for Highways Section 5, Measures to reduce Environment Impact Noise, Vibration, Dust and Emissions, makes no reference to air quality mitigation.*

The updated acoustic report finds that there will be a small increase in average noise level for residents surrounding the site. The report concludes this is ‘minor adverse’ in the short term, becoming ‘negligible’ in the long term. This short-term\long-term distinction is not based in planning policy but it is assumed the impact is reduced as people become accustomed to the noise. Whilst only a small increase in average noise level is predicted, this should be considered in light of the fact that existing average noise levels at this location already exceed WHO Community Noise recommendations (as is

fairly common in urban sites) so the development is contributing to a cumulative impact. I should also point out that the report only considers average noise level and states:

'Maximum noise levels such as shouts, whistles, screams or ball impacts are likely to be audible at the surrounding dwellings depending on the location of the source. However these are very difficult to quantify accurately given the large number of variables involved (e.g. noise type and location).'

The WHO document mentioned above states:

'It is not enough to characterize the noise environment in terms of noise measures or indices based only on energy summation (e.g. LAeq), because different critical health effects require different descriptions. Therefore, it is important to display the maximum values of the noise fluctuations, preferably combined with a measure of the number of noise events.'

It is very difficult to accurately assess this type of noise but maximum noise events such as those described also impact on residential amenity and the effect of this has not been considered in coming to the conclusion of negligible impact. Finally noise in gardens will in some cases slightly exceed the predicted levels, which are all predicted at building facades.

Overall I do not agree that the impact will be negligible. Based on the noise levels measured and with the expected noise character there will be a lower adverse impact on residential amenity from this development. The noise is likely to be 'Noticeable and intrusive' but not 'Noticeable and disruptive' as per Planning Practice Guidance. If you are minded to grant permission this impact needs to be accepted and whether the benefits of the proposal outweigh a small detriment to immediately surrounding residents.

It may be possible to mitigate and minimise further through use of carefully placed acoustic barriers such as fencing around the boundary, specific sports fields or the car park but the consultant would need to advise on the value or effectiveness of this in this case based on their assessment. In some cases this can be uneconomic or of very marginal benefit. As a minimum I would suggest that a condition is attached to restrict use of playgrounds and outdoor sports facilities to 8am -7pm Monday to Fridays. You could also attach a condition to prevent hire of facilities for use by other parties to restrict use to essential school activities only and prevent any noise at weekends.

The impact is clearly adverse for the reasons detailed, but in very general terms we need to be realistic that putting a school of 900 pupils and 64 staff on what was previously an open playing field is likely to adversely impact those living around it. I am not recommending refusal of the application but this detriment needs to be accepted if planning permission is granted. Interpretation of the NPPF and NPPG is that in this situation permission can be granted but we must 'mitigate and reduce to a minimum' the adverse impact. The NPPG is clear that this should be done 'taking account of the economic and social benefits being derived from the activity causing the noise'. There are several ways of mitigating and minimising noise ranging

from physical barriers to restrictions on hours of operation. However, the extent to which the use can be reasonably restricted or when the social benefit from the activities outweighs the impact on neighbours.

In respect of existing community uses clearly they do not increase noise level at the times of operation however they would in future be in addition to the impact from a new school. If the proposal also involves a significant expansion of community use of the site then this needs to be addressed and assessed and further details should be provided to clarify exactly what uses are proposed and when including a 'worst case' maximum use. If the intention is to make available the sports facilities for hire then this is a different prospect and arguably unnecessary to the successful operation of a school and could theoretically imply noisy activities every evening and all day every weekend and holiday which would be a different level of impact entirely.

Additional comments:

The acoustic report covers mitigation as per NPPF p.123 requirement to 'mitigate and reduce to a minimum other adverse effects..'. The revised acoustic report 'Bullers Wood Free School, Bromley – Environmental Noise Survey and Assessment' has not included a scheme of mitigations. The previous comments that mitigations are required to minimise adverse effects in accordance with NPPF still stand.

It may be possible to mitigate and minimise further through use of carefully placed acoustic barriers such as fencing around the boundary or specific sports fields or the car park but the consultant would need to advise on the value or effectiveness of this in this case based on their own assessment. In some cases this can be uneconomic or of very marginal benefit. As a minimum I would suggest that a condition is attached to restrict use of playgrounds and outdoor sports facilities to 8am -7pm Monday to Fridays. You could also attach a condition to prevent hire of facilities for use by other parties to restrict use to essential school activities only and prevent any noise at weekends.

There appears to be no changes to the acoustic report with regards to the recommendations and doesn't appear to have been revised. Whilst there are existing uses on site, which exceed the hours recommend as a condition, the school intensifies the use of the site throughout the day, which in conjunction with evening and weekend activities would adversely impact upon nearby residents, it would be beneficial for the applicant to consider mitigations for this and whether these are cost effective to the gain in order to adequately weigh this against the community benefit.

As no flood lighting is proposed the community benefit from use of external facilities is limited throughout the year anyway, therefore the main benefit comes from use of internal facilities such as the sport hall which would not be restricted by the above condition, though I would recommend that an acoustic barrier to the main car park is considered. Unless the applicant is willing to consider other mitigations then I would still recommend that the use of outdoor space is restricted."

Drainage:

“Reviewing the submitted FRA I note in paragraph 7.8 surface water will be stored in the sub-base of the lower car park before it infiltrate into the soil. The pavement for the car park will discharge to the sub-base which consists of gravel. The driveways will discharge to swales. I can confirm that the above strategy is acceptable subject to detailed design and an appropriate surface water condition.”

Thames Water:

“Waste Comments - Thames Water would advise that with regard to sewerage infrastructure capacity, we would not have any objection to the above planning application subject to informatives in respect of groundwater discharge requirements and petrol/oil interceptors to parking areas.

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. In respect of surface water it is recommended that 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. A condition needs to be imposed in this regard.

Water Comments: On the basis of information provided, Thames Water would advise that with regard to water infrastructure capacity, we would not have any objection to the above planning application subject to an appropriate informative regarding water pressure.”

Natural England:

Natural England has no comments to make on this application. The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment.”

Historic England (Archaeology):

“Recommend approval subject to a condition as the above planning either affects a heritage Asset of archaeological interest or lies in an area where such assets are expected. Although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a condition could provide an acceptable safeguard. A condition is therefore recommended to require a potential two-stage process of archaeological investigation and possible mitigation. A limited programme

of trail trench elevation is therefore recommended and that the archaeological interest should therefore be conserved by attaching a condition to secure the implementation of a programme of archaeological evaluation and mitigation.”

Greater London Authority (GLA):

Conclusions: “*London Plan policies on principle of land use: provision of school on playing fields, community use, urban design, inclusive access, sustainable development/energy, flood risk management and transport are the key strategic issues relevant to this planning application. The application does not comply with the London Plan; the following changes might, however, remedy the current deficiencies, and could possibly lead to the application becoming compliant with the London Plan:*

Principle of land use – provision of school on playing fields and open space: *The partial loss of playing fields and open space is a strategic concern. The applicant and the Council should submit a robust and comprehensive site search, including options of co-location with other existing schools, and an educational needs case specific to this location. The applicant also needs to demonstrate that the existing playing field use does not meet an identified need in order to justify its loss.*

Playing fields and community use: *A community use plan that demonstrates the extent of the proposed community use of the School’s facilities should be secured by the Council.*

Urban Design: *Further clarification is required in relation to access arrangement, repositioning of the pupils entrance, and appearance of the sports block. The Council is encouraged to secure key details of facing materials to ensure a high quality school building is delivered.*

Inclusive design: *Further details on accessible car parking and internal accessible arrangements, including lift provision, is required to ensure the development complies with policy 7.2 of the London Plan.*

Sustainable development-energy: *Further clarification is required with regards to energy efficiency, district heating network and site heat network, floor area and location of the energy centre, detailed roof layout for the proposed PV installation. The short fall in carbon dioxide reductions, equivalent to 18 tonnes of CO2 per annum, should be met off-site.*

Flood risk Management: *The proposal complies with policies 5.12 ‘Flood Risk’ and 5.13 ‘Sustainable Drainage’ of the London Plan. All the proposed measures should be secured.*

Transport: *The proposal would be unlikely to result in an unacceptable impact to the TLRN; however given that a number of the pupils would be expected to travel by bus the arrival and departure times of the proposed school should be staggered with surrounding schools to alleviate the likely impact on bus capacity. Further discussions regarding the detailed design of the bus stops and shelters located on Bickley Road should be held between the applicant*

and TfL. Electric vehicle charging points should be delivered, the level of cycle parking should be increased and the school travel plan will need to be updated and monitored to ensure consistency with London Plan transport policies.”

Planning Policies

In determining planning applications, the starting point is the development plan and any other material considerations that are relevant. The adopted development plan in this case includes the Bromley Unitary Development Plan (UDP) (2006) and the London Plan (March 2015). Relevant policies and guidance in the form of the National Planning Policy Framework (NPPF), National Planning Practice Guidance (NPPG) as well as other guidance and relevant legislation must also be taken into account. The draft Bromley Local Plan is also a consideration of limited weight.

Unitary Development Plan (2006)

BE1 Design of New Development
BE13 Development Adjacent to a Conservation Area
BE16 Archaeology
G8 Urban Open Space
L6 Playing Fields
C7 Educational and Pre-School Facilities
C8 Dual Community Use of Educational Facilities
NE3 Nature conservation and Development
NE5 Protected Species
NE7 Development and Trees
T1 Transport Demand
T2 Assessment of Transport Effects
T3 Parking
T6 Pedestrians
T7 Cyclists
T17 Servicing of Premises
T18 Road Safety
IMP1 Planning Obligations

London Plan (March 2015)

2.6 Outer London: vision and strategy
3.16 Protection and enhancement of social infrastructure
3.18 Education Facilities
5.0 Overheating and cooling
5.2 Minimising carbon dioxide emissions
5.3 Sustainable design and construction
5.7 Renewable energy
5.6 Decentralised energy in development proposals
5.8 Innovative energy technologies
5.10 Urban Greening
5.11 Green Roofs and Development Site Environs
5.12 Flood Risk Management

5.13 Sustainable Drainage
6.3 Assessing effects of development on transport capacity
6.9 Cycling
6.13 Parking
7.2 An inclusive environment
7.3 Designing out crime
7.4 Local character
7.5 Public Realm
7.6 Architecture
7.8 Heritage assets and archaeology
7.13 Safety, security and resilience to emergency
7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes
7.21 Trees and woodlands
8.1 Implementation
8.2 Planning obligations

National Policy:

National Planning Policy Framework (NPPF) (2012): Most relevant sections include:

Paragraph 14: Achieving sustainable development
Para 17: Core planning principles
Paras 29 - 41: Promoting sustainable transport
Paragraph 32: Highway impacts
Paras 56 – 66: Requiring Good Design
Paras 69-78: Promoting healthy communities
Paragraph 72: Delivery of school places
Paragraph 74: Playing fields
Paras 93-103: Meeting the challenge of climate change & flooding
Paras 109-125: Conserving and enhancing the natural environment
Paras 188-195: Pre-application engagement
Paras 196-197: Determining applications
Paras 203-206: Planning conditions and obligations

National Planning Practice Guidance (NPPG)

Communities and Local Government and Education “Policy statement – planning for school development” - August 2011 (the London Plan para 3.98 (supporting text to Policy 3.18 Education Facilities) sets out that the Mayor’s approach reflects this joint policy statement).

Sport England Planning Policy Statement – A Sporting Future for the Playing Fields of England is also relevant.

Bromley’s Proposed Submission Draft Local Plan:

The emerging Local Plan has completed its final consultation stage in December 2016. It is expected the Examination in Public will commence in 2017. The weight attached to the draft policies increases as the Local Plan

process advances. These documents are a material consideration and weight may be given to relevant policies as set out in the NPPF paragraph 216 which states:

“From the day of publication, decision-takers may also give weight to relevant policies in emerging plans according to:

- the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);*
- the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*
- the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).”*

Current draft Policies relevant to this application include:

Policy 21 Opportunities for Community Facilities
Policy 27 Education
Policy 28 Educational Facilities
Policy 29 Education Site Allocations
Policy 31 Relieving Congestion
Policy 32 Road Safety
Policy 33 Access to services for all
Policy 34 Highway Infrastructure Provision
Policy 37 General Design of Development
Policy 40 Other Non-Designated Heritage Assets
Policy 42 Development adjacent to Conservation Areas
Policy 46 Archaeology
Policy 55 Urban Open Space
Policy 58 Outdoor Sport, Recreation and Play
Policy 70 Wildlife Features
Policy 72 Protected Species
Policy 73 Development and Trees
Policy 75 Hedgerows and Developments
Policy 113 Waste Management in New Development
Policy 115 Reducing flood Risk
Policy 116 Sustainable Urban Drainage Systems
Policy 118 Contaminated Land
Policy 119 Noise Pollution
Policy 120 Air Quality
Policy 121 Ventilation and Odour Control
Policy 122 Light Pollution
Policy 123 Sustainable design and construction
Policy 124 Carbon reduction, decentralised energy networks and renewable energy
Policy 125 Delivery and implementation of the Local Plan

Draft Local Plan documents of specific relevance are also:

Local Plan Education Background Document September 2015

In addition the Bromley Primary and Secondary Schools Development Plans (January 2015 and January 2016) are relevant.

Planning History

87/03685/LBB: Indoor sports complex, single storey maintenance building and relocation of ATC building (OUTLINE) – Withdrawn

92/01032/FUL: Detached single storey building for sports store – Permitted 1.7.1992

95/02264/FULMAJ: Part one and two storey buildings for tennis and leisure centre with basement car parking landscaping and relocation of vehicular access to Bickley Road – Refused 14.11.1996 and appeal dismissed 12.3.1997

02/01003/FULL1: Boundary fencing facing Bickley Road – Approved 08.05.2002

16/03315/EIA: EIA Screening Opinion for 6FE Secondary School – EIA not required

Various applications for works to trees – approvals.

Permission was dismissed at appeal for a tennis and leisure centre in 1997 (95/02264/FULMAJ) primarily on the basis of the loss of open space and protected trees, however whilst this decision is a material consideration, it is only of limited weight given its age and the differences in the planning considerations relevant to the current proposal, which must be considered on its own merits as set out in this report.

Conclusions

It is considered that the main planning issues relating to the proposed scheme are as follows:

- Principle of Development
 - Compliance with Urban Open Space (UOS) policies
 - Educational Policy
 - Educational Need
 - Site Selection Process
 - Playing Fields and Sports Pitches
- Playing Fields and Sports Pitches
- Highways and Transport
- Design, Layout, and Scale
- Residential Amenity
- Trees and Landscaping

- Temporary Accommodation and Phasing
- Contributions
- Other Technical Issues

Principle of Development

- Urban Open Space

The application site comprises playing fields for Bullers Girls School, disused tennis courts, a wooded area, an Air Cadets building and Pavilion and is designated in the UDP as Urban Open Space. For the purposes of this application, the up to date development plan comprises the Unitary Development Plan (saved policies), the London Plan and the NPPF. In the first instance the application will be considered in the light of these policies. The weight and relevance attached to policies in the Proposed Submission Draft Local Plan is more limited but is a material consideration in the determination of the application as set out in paragraph 216 of the NPPF. The most relevant policy for this section is UDP Policy G8 which relates to development in Urban Open Space and states the following:

Proposals for built development in areas defined on the Proposals Map as Urban Open Space (UOS), will be permitted only under the following circumstances:

- (i) the development is related to the existing use (in this context, neither residential nor indoor sports development will normally be regarded as being related to the existing use); or*
- (ii) the development is small scale and supports the outdoor recreational uses or children's play facilities on the site; or*
- (iii) any replacement buildings do not exceed the site coverage of the existing development on the site.*

Where built development is involved; the Council will weigh any benefits being offered to the community, such as new recreational or employment opportunities against a proposed loss of open space.

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

The supporting text of this policy advises that UOS is locally important public or private open space identified by individual Councils that needs protection. The identified Urban Open Spaces are considered to be of local significance as they fulfil a specific function in their localities, such as providing important breaks in the urban area. The primary purpose of the policy is to protect the open character of the UOS.

Assessing the proposed development solely against the requirements of the UDP Policy G8, it is considered that the current proposal would be contrary to the policy.

In the supporting statements and the additional information submitted the applicant sets out their view that the 2006 UDP Policy is out of date and that paragraph 14 of the NPPF sets out the approach to decision-making when a plan is out of date and for decision-making this means granting permission unless there are any adverse impacts of doing so which would significantly and demonstrably outweigh the benefits. The considerations when reaching a conclusion on this aspect are the educational need in the Borough, the availability of alternative sites, the emerging development plan and the community benefits of the development. This needs to be assessed against the impact on the local environment, residential amenities and the transport and traffic impacts of the development.

UDP Policy G8 is not considered out of date as it accords with Policy 7.18 of the London Plan. The main consideration identified under Policy 7.8 is the protection of locally designated open space stating that *'the loss of protected open spaces must be resisted unless equivalent or better quality provision is made within the local catchment area. Replacement of one type of open space with another is unacceptable unless an up to date needs assessment shows that this would be appropriate.'*

The applicant has not supplied a formal up to date needs assessment to demonstrate that the replacement of one type of open space with another can be justified (or playing pitch provision in the area). Consequently the lack of a needs assessment makes it difficult to conclude that the proposed development is policy compliant in respect of Policy 7.18 of the London Plan.

Therefore assessing the proposed development solely against the requirements of London Plan Policy 7.18, it is considered that the current proposal would be contrary to this policy.

The Proposed Submission for the Draft Local Plan (Nov 2016) indicates the Council's view of the way forward for this policy. Under paragraph 216 of the NPPF the emerging Local Plan carries some weight dependent upon the stage of preparation, the extent to which there are unresolved objections and the degree of consistency with the NPPF. At this stage it is considered some weight can be attached to emerging Local Plan Policies.

The emerging Local Plan has taken the unusual step of amending existing UOS policy to reflect the urgent need for the Borough to find school places for pupils in the Borough. The draft policy increases the flexibility for school expansions on UOS sites in existing education use or allocated for education use in the Local Plan and relates this directly to policy support where there is a demonstrable need for additional education buildings.

Draft Policy 55 states:

Proposals for built development in Urban Open Space (UOS) will be permitted only under the following circumstances:

a - *The development is related to the existing or allocated use (in this context, neither residential nor indoor sports development, other than sports*

development related to educational use on the site, will normally be regarded as being related to the existing use); or

***b** - The development is small scale and supports the outdoor recreational uses or children's play facilities on the site; or*

***c** - Any replacement buildings do not exceed the site coverage of the existing development on the site.*

Subject to the clauses above, where built development is involved; the Council will weigh any benefits being offered to the community, such as new recreational or employment opportunities, against a proposed loss of open space.

Where there is a demonstrable need for additional educational buildings sensitive design and siting will be sought to ensure that the impact on the open nature of the site is limited as far as is possible without compromising the educational requirements. In all other cases the scale, siting, and size of the proposal should not unduly impair the open nature of the site.

It is considered that the proposed new build development to provide a secondary school, would comply with this draft policy. In addition, given the scale of the building and associated development, the proposal minimises the harm to the open nature and character of the site with the retention of all the existing playing field area and retention of most trees.

There is a Draft Allocation for this site in the emerging Local Plan, which identifies the site as a location for a 6FE secondary school, however this can only be afforded limited weight in the overall planning balance at this stage given its draft status.

The use of this site for a school use, whilst retaining its UOS designation as identified in Draft Policy 55, is also considered to be benefit to the use of other sites that may be situated in the Green Belt or on Metropolitan Open Land, due to the limited availability of sites for schools within the Borough. This has been identified through a Borough wide assessment site selection process which has been used to inform the Draft Local Plan and the Draft allocation for a school on this site.

- Educational Policy

The Education Act (2011) places a statutory duty on Local Authorities to provide sufficient pupil places for every child of school age in their local area and keep this under review. The Academies Act (2012) changed the approach to educational provision and encourages the establishment of new Free Schools. The Borough recognises the need to prepare overall strategies to meet the current and future supply of Primary and Secondary School places, with Bromley experiencing a particular growth in demand for school places from increases in birth rates and migration.

The NPPF was preceded in August 2011 by a joint ministerial policy statement on planning and education “Policy statement – planning for schools development” which 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”. It sets out the Government’s commitment to support the development of state-funded schools and their delivery through the planning system. In summary it identifies the following:

The Government is firmly committed to ensuring there is sufficient provision to meet growing demand for state-funded school places, increasing choice and opportunity in state-funded education. State-funded schools include Academies and free schools. The Government wants to enable new schools to open, good schools to expand and all schools to adapt and improve their facilities. This will allow for more provision and greater diversity in the state-funded school sector to meet both demographic needs and the drive for increased choice and higher standards. Creating free schools remains one of the Government’s flagship policies. It is the Government’s view that the creation and development of state-funded schools is strongly in the national interest and that planning decision-makers can and should support that objective, in a manner consistent with their statutory obligations. The planning system should operate in a positive manner when dealing with proposals for the creation, expansion and alteration of state-funded schools, and that the following principles should apply:

- There should be a presumption in favour of the development of state-funded schools, as expressed in the NPPF.
- Local authorities should give full and thorough consideration to the importance of enabling the development of state-funded schools in their planning decisions. The Secretary of State will attach significant weight to the need to establish and develop state-funded schools.
- A refusal of any application for a state-funded school, or the imposition of conditions, will have to be clearly justified by the local planning authority. Given the strong policy support for improving state education, the Secretary of State will be minded to consider such a refusal or imposition of conditions to be unreasonable conduct, unless it is supported by clear and cogent evidence.

Paragraph 72 of the NPPF identifies that the government attaches great weight to the need to create, expand or alter schools and says that Local Planning Authorities should work with school promoters to identify and resolve key planning issues at an early stage, while Paragraph 73 of the NPPF says that access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of Communities.

The London Plan in Policy 3.18 - Education Facilities supports proposals which enhance the expansion and provision of educational facilities including new build, expansion of existing or change of use to educational purposes. Those which address current and projected shortages of primary school places will be particularly encouraged. The London Plan para 3.98

emphasises the strength of this positive consideration and refers to the joint policy statement on Planning for Schools Development (Aug 2011).

Chapter 13 of the UDP sets out the Council's objectives in supporting the provision of local community services. Policy C1 of the UDP states that proposals for development that meet an identified education need in the Borough will normally be permitted provided it is accessible by modes of transport other than the car and accessible to members of the community it is intended to serve. Policy C7 of the UDP identifies that new or extensions to existing educational establishments will be permitted provided that they are located so as to maximize access by means of transport other than the car and are required to prepare a School Transport Plan. These policies represent the adopted Development Plan policies in respect of education provision.

The emerging Local Plan has been developed on the basis of the evidence base, including an Education Background Paper (Sept 2015) which set out the educational need on the basis of the Council's update of "Planning for Growth – Review of Secondary Education", and undertook an extensive site search of the full range of potential sites, including existing education sites, vacant social infrastructure sites and all sites submitted through the Local Plan "Call for Sites" process, along with sites identified by proposed Free School providers. On the basis of the evidence base the Council consulted on proposed allocations to meet educational needs in the Draft Allocations, Further Policies and Designations Document 2015. This consultation included St Hugh's Playing Field as a proposed allocation for a secondary free school. The Draft Local Plan was approved for consultation at Executive Committee on July 2016 and retains the proposed allocation at St Hughes Playing Field. The evidence base has been recently updated and published in the draft Education Policy Background Paper.

In response to increasing pressure for school places and the emphasis on the need to ensure sufficient places in the London Plan and the NPPF the Proposed Submission Draft Local Plan includes three draft education policies. These are:

Draft Policy 27 – Education - advises that the Council will assess the need for education infrastructure and allocate sites accordingly by safeguarding education sites for the plan period. It identifies *"In all cases new development should be sensitively designed to minimise the footprint of buildings and the impact on open space particularly playing fields, as well as seeking to secure, as far as possible the privacy and amenities of any adjoining properties, whilst delivering the necessary educational infrastructure."*

Draft Policy 28 – Educational Facilities - supports proposals for new educational facilities which meet local need, looking first at opportunities to maximise the use of existing education land. It states:

"The Council will support proposals for new educational facilities which meet local need, looking first at opportunities to maximise the use of existing Education Land or redundant social infrastructure."

Where new sites are required, proposals will be permitted unless there are demonstrably negative local impacts which substantially outweigh the need for additional education provision, which cannot be addressed through planning conditions or obligations, and subject to:

- i. open space and conservation policies*
- ii. the need for the provision locally,*
- iii. highway safety, and*
- iv. the accessibility of the site by means of transport other than the car.*

In all cases new buildings should be sensitively designed to minimise the footprint, loss of open space and the impact of development, seeking to secure as far as possible the privacy and amenities of any adjoining properties, whilst delivering the necessary educational infrastructure.

Proposals involving the sharing of facilities, including open spaces, between educational facilities, and / or the dual use of educational facilities by the wider community will be encouraged.”

Draft Policy 29 – Education Site Allocations – allocates a number of new school sites for primary and secondary education. It states:

“Subject to Local Plan Policy 27 ‘Education’ the Council will seek to meet the need for education provision over the Local Plan period as identified in the Council’s Primary and Secondary School Development Plans, by allocating sites for educational purposes and re-designating school sites in Green Belt and Metropolitan Open Land as Urban Open Space...

a –allocating the following sites for new/enhanced education provision:

- 1 Westmoreland Road*
- St Hughes Playing Field, Bickley Road*
- Land at Bushell Way, Chislehurst (note: this is for a primary school),
and*
- Kentwood Site, High Street, Penge*

b - allocating sites for new education provision, removing them from the Green Belt or Metropolitan Open Land and re-designating them as Urban Open Space, safeguarded as ‘Education Land’ for education development only.....

c- Removing areas within the following existing school sites from Green Belt or Metropolitan Open Land and re-designating them as Urban Open Space, safeguarded as ‘Education Land’ for education development only....

Planning applications will be required to provide robust assessments of the impacts of development, including for example, highway implications, and provide appropriate mitigation to address adverse impacts.

The principle of the provision of new schools is therefore well established in planning policy from a National to a Borough level. The site would offer an option for education facilities that fulfil an identified need.

Therefore proposals for new schools should be given positive consideration and should only be refused where there are demonstrable negative 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.

- Educational Need

The most recent update of the Secondary School Development Plan, and reflected in the updated Education Background Paper, was agreed by the Council (Portfolio Holder) in January 2016, indicating the need for 17 additional forms of entry required for 2018/19 which is to be addressed by the expansion of Bishop Justus and the opening of two new schools (one being Bullers Wood Boys School), both of which are currently without permitted sites. Bullers Wood Boys School has been approved by the Secretary of State for Education to open a Secondary School sharing some functions with Bullers Wood Girls.

If both secondary Free Schools were able to secure permission and open in temporary accommodation in September 2017 the projections from the Secondary School Development Plan 2015 – 2018 still indicate an outstanding need of 95 places (3FE) by 2018/19, rising to 311 (10/11FE) in 2019/20.

Without Bullers Wood School the shortfall by 2019/20 is projected at 491 (16/17FE). Without both Bullers Wood School and the other secondary Free School currently seeking planning permission (Eden Park High School) on this Agenda, the shortfall experienced over the last couple of years, resulting in the provision of bulge classes, will increase resulting in a projected shortfall of 731 places (24FE or 3 x 8FE new schools) by 2019/20.

In addition to the two proposed Free Schools mentioned above there is Ministerial approval for the opening of a University Technical College (UTC) which has been altered to take in students from 11yrs, thus, subject to a planning application being submitted and agreed this provision will contribute to the need for secondary provision, however the timeframe to meet the need, as identified above, is extremely short.

Similarly there are other sites identified within the emerging Local Plan to meet the need over the Local Plan period but no further applications have been made to the Secretary of State to open free schools on these sites and as such they are unlikely to be able to provide for the need within the next couple of years

The figure of up to 34 FE within the Council's Secondary School Development Plan 2016 is based on birth rates and school census information. This figure is based on the 5% that the Pupil Places Working Group agreed should be

added to the base GLA school roll projections to provide a contingency for fluctuation in growth and parental choice. The 34FE relates to 1,022 Year 7 places required in 2022 compared with the base school population in 2014/15.

According to the 2016 Summer School Census there are currently 1,292 places vacant across the whole of secondary sector (ages 11-19). This equates to about 5% of total places. However, Year 7 only have just over 150 places free. These 1,292 vacant places are spread across all years including sixth form, so these are not places that could automatically be offered as Year 7 places. Furthermore, based on all years, 9 existing secondary schools are already over capacity and need to adjust their intake to their respective capacity.

The ongoing growth in demand for secondary school places is also indicated by having proportionally fewer places available in Year 7 than Year 11. In Year 7 there are 160 spare places across the Borough, but these spare Year 7 places are in the east of the Borough (Kemnal & Priory) masking the shortfall in the Northwest & Centre of the Borough where the demand is highest. According to the GLA 2015 Pupil Roll Projections there is an estimated increase in demand of 5,444 11-18 age secondary places between 2016 and 2024. If you subtract the 1,292 places currently surplus within Bromley Schools as indicated by the Summer 2016 School Census, this suggests that there is currently deficit of 4,152 places by 2024. This equates to a shortfall of 138 classes.

In addition, a 5% allowance for parental choice (recommended in guidance and agreed by the Council's school place working group) would add a further 6FE. The Council's School Admissions team are reporting 200 additional admissions for 2017 - close to the GLA predicted 204 deficit, and late applications can be anticipated which may increase this further. It is clear from analysis that Bromley needs an additional 2 functioning secondary schools by Sept 2018, to provide an 11 or 12 FE deficit which allows no allowance for parental choice.

There is, therefore, a recognised and strong case of educational need within the Borough that is required to be met, as required by current pupil place legislation.

The decision "not to contest" the planning appeal submitted against non-determination for temporary provision for the Eden Park Academy to provide 6FE on Ravensbourne School, along with the permitted 2FE expansion at Bishop Justus addresses the deficit for Sept 2017, albeit in the short term only. At the time of writing this report, the Council has not received the Inspectors formal decision on this appeal.

The Applicant in their submissions have also outlined this need and although this may be set out in a different format, the same evidence base and statistics has been used to set out their position and the case of need for educational sites and a free school on this site to serve the Borough. The

case of need submitted is therefore considered to address the requirements identified by the GLA in their Stage 1 referral letter.

The Council has a statutory duty to secure sufficient school places under the Education Act (1944) and this is a pressing concern which from a planning perspective would be a material consideration. The NPPF para.72 and Aug 2011 joint ministerial statement also require Local Planning Authorities to give significant weight to the need to create schools. This is reflected in The London Plan (2016) Policy 3.18 and draft Local Plan Policy 28 “Education Facilities” which require that proposals for new schools should only be refused where there are demonstrable negative local impacts which substantially outweigh need for the provision and which cannot be addressed through the appropriate use of planning conditions or obligations.

Whilst the site is allocated for secondary education within the draft Local Plan it is contrary to the adopted UDP Urban Open Space policy. The NPPF para 216 advises that the emerging Local Plan carries some weight dependent upon the stage of preparation, the extent to which there are unresolved objections and the degree of consistency with the NPPF.

Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The Planning Practice Guidance advises that *“it is for the decision maker to decide what weight is to be given to the material considerations in each case, and (subject to the test of reasonableness)”*.

In considering the balance to be made in respect of material considerations it is important to note that:

- the “great weight” that the NPPF attaches to the need to create, expand or alter schools.
- the policies and allocations in the Draft Local Plan propose to address the imminent shortage of secondary school places highlighted within the Secondary Schools Development Plan
- the lack of alternative provision, evidenced within the Local Plan Education Background Paper, capable of delivery within the necessary timeframe, to meet the statutory duty under the Education Act to secure sufficient school places.

The Education Department have set out the key implications for education provision in Bromley, as follows:

- We have a serious issue around meeting our statutory sufficiency duty from September 2017 unless the supply of school places is increased.
- If nothing is done there will be a deficit of 702 places or 23 FE [per year] in 2022. This level of increase matches the quantum of increase in pupils that has been experienced in the primary sector.
- There will be a 6 or 7FE deficit September 2017. Even if Bishop Justus goes to 8FE in September 2017 (this is the only scheme that currently

has planning permission) there is still a need for at least one of the proposed Free Schools to open. This is particularly the case as surplus places in existing schools will continue to be focussed in the East of the Borough whilst growth is in the West and Centre.

- Due to the level of need, in March 2017 we are unlikely to be able to offer every child a place through the co-ordinated admissions process even if the 2 Free Schools open. This problem will be exacerbated if neighbouring Boroughs are unable to offer additional places as in previous years.
- Admissions are currently reporting around 200 additional applications for secondary school places for September 2017, and this is before late applications are considered.

Objectors have raised concerns that other secondary schools within the Borough have capacity or are wishing to reduce their intake, however this is not supported by the Council's Education Officers and would compound the need for places as set out above.

There is therefore policy support nationally, regionally and in the draft Local Plan for the provision of necessary school places. The demonstrable need for places and the emerging Local Plan are material considerations to the overall determination of the planning application.

- Site Selection Process

The Proposed Submission Draft Local Plan, as outlines above, has gone through a process of evidence based assessment and an extensive site selection process to identified sites that could be available for expansion of existing schools and new school sites to address the need for primary and secondary school places due to rising birth rates. This evidence and the site selection process have been agreed and accepted by the Council Education Select Committee and approved by the Education Portfolio Holder on behalf of the Council.

The Secondary Schools Development Plan (2016) indicates a need for an additional 34 FE by 2022, with almost half required by September 2018. To date 2FE have been permitted.

Secondary school catchments are significantly larger than for primary schools which enable expansions at existing schools. However, in providing secondary school places the local authority needs also to satisfy the statutory requirement to provide a reasonable offer, including consideration of the travel distance and times for a child to access a school place.

To address the emerging need for additional school places the Council has undertaken a sequential approach in two stages, firstly the assessment of the capacity of existing education sites, redundant social infrastructure and other policy compliant sites and secondly a policy alteration to increase the flexibility of Urban Open Space (UOS) in respect of the expansion of existing educational facilities.

However, this is not sufficient to address the identified need and therefore it has been necessary to redesignate existing school sites from Green Belt and Metropolitan Open Land (MOL) along with specific site allocations. The sequential approach to meeting the projected need, has involved an assessment of the full range of potential sites. The Local Plan Draft Policies and Designation consultation document (Feb 2014) involved a call for sites. All sites were subsequently assessed where appropriate for their potential to address the education need, along with sites identified by proposed Free School providers and other vacant education and social infrastructure sites. The demonstrable absence of alternative sites presents exceptional circumstances to justify assessment of potential educational sites in the GB and MOL for expansion and for new specific education allocations.

Initially sites were grouped relating to existing strategic policy constraints. Only Group 1 sites could offer compliant opportunities. Sites in each group were assessed in line with the approach to social infrastructure and specifically education, set out in London Plan Policies 3.16 and 3.18 and ranked. The individual merits and recognised material considerations relating to each site were then assessed against local planning policy. Preferable sites were then considered by the Local Development Framework Advisory Panel in order to bring forward recommended site allocations for the draft Local Plan.

The assessment findings set out sites with the potential to deliver the education provision through policy compliant sites or through redesignations which cause least harm to the GB and MOL in line with the NPPF and as required by the Mayor. Group 1 sites have been identified which could potentially facilitate some expansions to schools over the Local Plan Period and two sites for new schools. These sites are insufficient to address the projected need and it is therefore necessary, on the basis of the site rankings, to increase the flexibility of the Council UOS policy in relation to education development for existing schools. This proposed increased flexibility to the UOS policy produces another three sites ranked A with potential for expansion. Collectively the A ranked sites are insufficient to address the need outlined in the approved School Development Plan 2016 and it is therefore necessary to assess the potential of other sites.

Whilst school expansions contribute significantly to meeting the education need over the plan period much of the need will be met through the provision of new 'Free Schools'. Collectively the three earlier ranked groups were unable to deliver sufficient new sites hence the assessment of the Group 4 sites. This group includes two ranked B sites, being St Hughes Playing Fields and one which is designated Green Belt.

Following the GLA's Stage 1 response which identified a need for the applicant to demonstrate why shortages cannot be addressed on alternative sites and to undertake a site search, the Applicant has also undertaken a site assessment process of all potential sites within a 5 mile radius from the application site which includes all development land of 4-10 acres or existing buildings of 70,00ft². The search includes and has identified all 'on market'

opportunities or development land and has had regard for 'off-market' land, including Bromley's employment land clusters, natural green space, parks and outdoor sports sites that meet the above parameters. The sites have been assessed according to their suitability, resulting in the selection of the preferred option.

This process identified a preferable site in Chelsfield which is situated in the Green Belt and a Conservation Area where new development is likely to be resisted in line with planning policies. The assessment identified 12 further potential sites in the Green Belt, 1 in Metropolitan Open Land, 2 sites sited within an Area of Nature Conservation Importance, 2 allocated housing sites that are currently being developed, The Widmore Centre and Balmoral Avenue (Beckenham Academy) both of which are already being brought forward for other Free Schools.

This further identifies that alternative sites for a new school are limited within this part of the Borough and in all cases have restrictive designations that policies seek to preserve or are allocated for housing or other schools. The deliverability of other sites for new schools is therefore restricted and the need for the application site for a school has been identified. The site selection process has therefore been rigorously considered by both the Council in the development of its emerging Local Plan and the Applicant in support of the application. The GLA's Stage 1 comments have therefore partially been addressed through the site selection process and are considered further in the educational need justification put forward by the applicant and discussed in the next section.

Playing Fields and Sports Pitches

The NPPF para.74 and the London Plan Policy 3.19 preclude the loss of open space, sports and recreational land, including playing fields and wherever possible, multi-use public facilities for sport and recreational activity should be encouraged. Policy L6 of the UDP seeks to protect the loss of playing fields unless an assessment of open space provision reveals a surplus any deficiency could therefore be off-set against existing provision or re-provision. Draft Policy 58 also seeks suitable demonstration of existing pitch facilities and the re-provision to a higher quality if facilities are lost. NPPF para. 74 states that existing open spaces and playing fields should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

London Plan Policy 3.19 identifies that proposals which increase or enhance the provision of sports and recreation facilities will be supported; whereas

those that result in a net loss of sports and recreation facilities, including playing fields should be resisted

The overall site forms a playing field, as defined in legislation and detailed plans showing the existing and proposed sports provision have been provided with the application. The site currently provides a small grass running track, long jump, 3 hard surfaced tennis courts (disused), 6 grass tennis courts (disused), and 3 sports pitches for on the site. These are used by Bullers Wood Girls School, the Air Cadets and for football coaching.

The proposed scheme following redevelopment will retain the 3 sports pitches and the majority of the immediate surrounding area around the pitches and a 100m running track. The school building will be constructed on the disused tennis court area and will provide a 4 court sports hall and two external hard surfaced multi-use games areas (MUGA's) which are large enough for two small pitches.

Sport England have made representations in respect of the application being a Statutory Consultee. They have raised a statutory objection to the proposal on the basis of a loss of part of the overall playing field area (in physical and functional terms), which includes the area to the south east of the trees which has been marked out for playing pitches in the last five years and the area to the north east which currently is not marked out for pitches. These are the two areas of the disused tennis courts and Sport England classifies these areas as part of the whole area of playing field. In addition, the bin store and sub-station are proposed to be built on the part of the playing field which contains a football pitch.

The applicants have been in discussion with Sports England and have put forward the view that tennis courts are not included in the definition of a playing pitch as identified in Sport England's 'Planning Policy Statement – A Sporting Future for the Playing Fields of England'. The 3 main sports pitches will be retained on site and are unaffected and is therefore in accordance with Exception Policy E3 of Sport England's requirements. Furthermore the proposed scheme incorporates a new 4 court Sports Hall and 2 MUGA's which will re-provide any provision which Sport England consider is lost through redevelopment and complies with Sport England Exception Policy E5 in that the nature of the proposals and sports offer included should be set against the quality of the provision being lost and that "the proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing fields".

Sport England have, however, maintained their objection and have expressed the view that the proposed development results in the loss of playing fields and does not meet any of their Exception Policies. Such an objection therefore requires the application to be referred to the National Planning Casework Unit if it was to be the intention of the Local Planning Authority to grant planning permission.

Sport England has further stated that a potential way forward would be to propose a community size 4 court sports hall (34.5 x 20m) and position the MUGA's side by side with fencing and lighting. In addition, if the Council were minded to approve the application a condition is recommended that requires a community use agreement to be prepared and approved to secure community access to the sports facilities.

The GLA identified some concern in respect of the loss of playing fields and playing pitch provision on the site which will result in the overall loss of playing fields and wish to see the demonstration that Sport England, London Plan and NPPF policies are met in full. They have also highlighted the need for the site to comply with Policy 3.18 of the London Plan in respect of the use of school sites for community use and the production of a community use plan to demonstrate the extent of proposed community use of the facilities which can be secured.

The applicants have subsequently submitted a Community Use Statement which identifies the type of additional community uses the site could accommodate. This includes the existing community users of the site and the potential after school hour uses the site could accommodate on the sports field, sports hall, dining hall and main hall as well as use of the other studios and classrooms. These uses would finish at 9.30pm with the use of the outdoor spaces during daylight hours only. In addition there is the potential for the use of the site on Saturdays and school holiday clubs.

In view of the above policy considerations and the facilities to be provided it is considered that although there is an overall loss of playing fields, this loss has been mitigated by the full retention of the existing playing pitches and the provision of the 4 court sports hall and 2 MUGA's, and that the proposed facilities are sufficient for the proposed school.

The sports hall and two MUGA's are partially proposed on the existing tennis courts. The provision of these facilities, that includes, two external 5 a side sports pitches is considered to be uplift in terms of the quality and quantity of pitch provision on the site, with no resulting loss of sports pitches. The Sports Hall will provide 4 further indoor courts and associated facilities which again is an uplift of the existing facilities, being disused tennis courts. This provision will therefore meet any deficiency and ensure pupils and the community benefit from high quality sports and the sport related benefits this facility will deliver both for the school and wider community. This is therefore considered to meet the policy requirements sufficiently, resulting in no net loss of pitches and further provision of sports and recreational facilities, as required under the above policies.

In terms of the use of the site for Bullers Wood Girls School, this will not be affected. The Girls School use the existing playing pitches but the disused tennis court area is not used. All these facilities will therefore be retained and changing facilities re-provided once works are complete. The Applicant has also identified how both schools will use the pitches during the school year with alternative use of the 'top and bottom field' for their sports curriculum.

The bin store and sub-station also extend onto the playing field area which is also contrary to playing field policies and Sport England's requirements, however, it has been demonstrated that this does not affect the laying out of the sports pitch and its use which are fully retained.

For these reasons, it is considered that there is no overall loss of playing pitch provision on the site, the use for Bullers Wood Girls School is fully retained and higher quality outdoor pitches and indoor sports courts are to be provided. This therefore accords with the fundamental principle of the policies which seek to resist any loss of playing pitches and playing fields. However, whilst the proposal involves alternative sports provision there remains an outstanding objection from Sport England.

The existing playing fields and the proposed MUGA's and Sports Hall are sited in relatively close proximity to a number of residential properties on Chislehurst Road and Pines Road. As will be discussed in detail in the report it is considered that the proximity of these dwellings does raise questions over the new facilities being suitable for use both within and outside of school hours due to the potential for noise and disturbance to these existing properties and their residential amenities. This is considered further later in this report.

It is likely that if an approval were to be recommended conditions could be imposed to control the use of the site for community purposes in the form of a community use agreement and further details of the proposed surface water drainage system, the proposed surface materials of the MUGA's, their fencing and hours of use of the site could all be dealt with by condition. Overall the matter of playing fields and sports pitches is considered acceptable.

Highways and Transport

The NPPF recognises that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability objectives. All developments that generate significant amounts of movement should be supported by a 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 in Paragraph 32 that development should only be prevented or refused on transport grounds where the residual cumulative impacts are severe.

London Plan and UDP policies encourage sustainable transport modes whilst recognising the need for appropriate parking provision. Policies T1, T2, T3 and T18 of the UDP are relevant and car parking standards within the UDP should be used as a basis for assessment. The requirements for car and cycle parking are laid out within Tables in the London Plan, as subsequently amended. In addition, the requirements of Policy 6.13 require that 1 in 5 spaces should provide electrical charging points. Consideration should also

be given to the location of the required 10% of wheelchair spaces and their proximity to entrances. Cycle spaces should also be provided under these policies.

The site is located in the triangle of land surrounded by Bickley Road, a London Distributor Route and the A222, Chislehurst Road, a Local Distributor and the B264 and Pines Road. There is an existing vehicular access from Bickley Road and there is also a pedestrian access in Pines Road to the site.

A number of documents relating to the potential highway impact of the proposals have been submitted in support of the application including a Transport Assessment (TA) (revised and updated since original submission), a stage 1 Road Safety Audit, a Draft Construction Management Plan (CMP) (also revised and updated since submission) and a Draft Travel Plan.

A detailed Transport Statement has been submitted which includes existing, proposed and predicted traffic flow data and counts, a Stage 1 Road Safety Audit, Parking Stress survey, traffic queue length surveys and traffic light timings. It identifies all aspects of the traffic implications of the proposals including vehicular and pedestrian routes, layouts, parking plans, swept path analysis, public transport availability and measures to minimise the need for the cars and encourage sustainable measures to encourage walking and public transport to the site for pupils and staff. It identifies that the school opening hours will be 7.45 – 14.15 with compulsory enrichment/homework sessions until 15.20 to minimise additional traffic at peak times.

In addition the applicant was requested during the course of the application to consider alternative access options into the site, particularly from Bickley Road. Details of potential alternative points of access on Chislehurst Road, Bickley Road and Pines Road have been put forward with the application including an assessment of their pros and cons. The applicant has discounted access from Bickley Road for a number of reasons which shall be discussed in more detail later in this report. An alternative access option for Chislehurst Road has been identified but has not been pursued further.

- Proposed Access Arrangements

The Proposed Development includes the provision of a new vehicular access on Chislehurst Road as the main entrance to the site. A one-way system through the site, utilising the existing road currently on the site, will provide a 10 space parent pick-up and drop-off area with a visitors parking area next to the school entrance for visitor and disabled car parking (11 spaces) and continuing through the site in a loop to a 58 car parking area for staff. The existing access on Bickley Road is being retained (largely in its current form) as the exit from the site. However service vehicles will enter and exit via Chislehurst Road with a delivery and turning area close to the new access. New separate pedestrian access points are also being proposed from Chislehurst Road and Bickley Road.

The new vehicular access proposed off Chislehurst Road has raised significant concerns regarding the impact of a new point of access, due to the

existing high volumes of traffic on Chislehurst Road, particularly at peak times, its narrow width (between 5-6m), lack of pedestrian footway, the safety of a vehicular access point for a large school in this location and the impact the additional traffic and cars will have on nearby residential properties. In addition a pedestrian access is proposed adjacent to the proposed vehicular access and small section of footpath and visibility splays. The impact this would have on the existing trees could be significant. A significant number of objections from local residents have been received raising such concerns.

A Stage 1 Road Safety Audit has been carried out on the proposed Chislehurst Road access. This has raised a number of issues with the proposed access. The main issues raised were visibility splays for both vehicles and pedestrians exiting the site, which will require the removal of trees and vegetation on a regular basis and continued maintenance, swept paths, potential parking at the access and the lack of footway. There is currently no footway along the south side of Chislehurst Road and the footpath on the northern side of the road is only 1.3m in width. A crossing point is also being proposed, rather than a footway, so there is unlikely to be sufficient width to cope with the number of pupils trying to use it. The advice in Manual for Streets is that footway widths in excess of 2m should be considered for areas around schools, and this will not be provided.

The proposal is for the main access to be from Chislehurst Road with the exit to Bickley Road. This has some merit in that it does spread any impact between the 2 roads. However, the Chislehurst Road access has raised a number of objections and issues raised in the Road Safety Audit. It is also highly likely that parents will drop off children on this side of the road and they could potentially end up walking in the road to the entrance. If they cross the road, the footway on the northern side is substandard. In the morning peak the pupils heading towards Bullers Wood School for Girls already take up the footway for periods of time.

The Safety Audit concludes that a number of access options have been explored in the design process but the chosen solution with a new access from Chislehurst Road and the Bickley Road access used for exit purposes only are found to have the least environmental impact, are most technically sound, allow for traffic to be shared across both roads and is the preferred option from a highway engineering and safety perspective given the nearby junctions.

A fundamental issue would be whether parents go onto the site to pick up /drop off pupils. This could depend on a number of factors, such as parent's routing. There are still questions around if there is enough waiting space for the number of vehicles forecast and whether the length of time drivers take to go through and exit the site deter them from going in.

The existing and proposed pedestrian facilities on Chislehurst Road are contrary to standards as they are not of sufficient width to accommodate the anticipated increase in footfall. This combined with increases in traffic volumes could lead to increased road safety concerns as pupils attempt to cross the road. The Stage 1 Road Safety Audit therefore raises a range of serious

highway safety concerns in relation to the schools proposed access arrangement and the sub-standard pedestrian facilities have been provided. The items raised in the Stage 1 Road Safety Audit have not been appropriately addressed in the application or its revisions and therefore raise significant pedestrian and road safety concerns.

No assessment of associated pedestrian/cycle routes has been provided or how these additional trips will be accommodated on local footways.

There could be “School Keep Clear” markings provided but yellow lines have limited effect around schools unless a traffic warden is continually present.

In respect of the proposed pedestrian access on Bickley Road this is likely to generate a significant increase in footfall on a London Distributor Road. Therefore crossing Bickley Road in the vicinity of the school is a serious concern and a dedicated pedestrian route to minimise conflict and provide access to public transport connections is required. It is proposed that a puffin crossing is to be installed however, such a provision needs to be designed, safety audited and secured through a s106 legal agreement. Limited details have been provided at this stage and it is not clear whether this could be satisfactorily achieved given the proximity of the nearby traffic light controlled junction.

Officers have suggested that an alternative scheme(s) for access should be explored in detail to see what the impacts would be on providing the access and egress to the site from Bickley Road. The supporting information indicates that this option has been discounted due to a number of factors including the existing wall and gates, potential problems relocating the bus stop on Bickley Road, and impact on trees and the playing fields. However, the existing brick wall and access gates are not either statutory or locally listed and although of some merit, their retention is not currently controlled. The other matters raised may not be fatal to any such proposal. Since this option for access has not been explored thoroughly (no detailed plans or studies showing its impact have been submitted for consideration), it cannot be discounted, and given the issues raised in the Safety Audit and elsewhere regarding the access arrangements proposed in the application, this is not considered acceptable, contrary to Policy T18. The impacts of the proposed access on vehicular and pedestrian safety are unacceptable.

- Traffic Generation

The submitted Transport Assessment (TA) has identified the proposed traffic levels which have been sourced from travel survey data of staff and pupil levels and modal splits at the nearby Girls School. The TA estimates that 235 additional trips in the AM peak hour and 40 in the PM peak hour will be likely when taking into account measures in the Travel Plan.

The TA states that whilst the junction modelling shows that 3 local junctions exceed their theoretical capacity in future year scenarios, the impact of the traffic during the development phase is minimal when compared to the base

traffic flows and is not considered to be severe in accordance with paragraph 32 of the NPPF.

With regard to impact once the school is open, an additional 152 rail trips, 218 bus trips are identified and there is capacity to accommodate these additional trips.

The data from the Girls School would include siblings sharing so the figures for car sharing may be on the high side for a one year intake.

The TA argues that this does not consider the effect of siblings sharing which would reduce the car trips by 5% and the effect of the School Travel plan which would reduce trips by 10%. However, this seems ambitious particularly given the modal split is taken from a school with a Travel Plan in place and where there would be siblings present.

The number of vehicular trips has been reduced using various assumptions – siblings, use of Travel Plan etc but the modal split would already have taken these into account.

There are therefore questions over the number of trips that the school will generate and whether the information provided is accurate. The potential for the Travel Plan to work has also been questioned, with a high likelihood that parents will drop off their children on the way to work.

- Capacity

The local highway network is operating at or close to capacity and the traffic generated from the proposed school will only add to the sometimes substantial delays on the network.

The 3 junctions at the corners of the site have been subject to modelling to demonstrate the effect of the additional school traffic. The surveys show that the junctions are working close to or over capacity at present.

The roundabout junction of Bickley Road and Chislehurst Road is overcapacity at present. There are substantial queues on Chislehurst Road in the AM peak. The computer model, ARCADY, is generally accepted as becoming unreliable once the junction goes over capacity and so it is unclear how much weight can be given to the results. There are other anomalies with the traffic flow diagrams shown in the TA. If the numbers input to the models are lower than those surveyed the results will underestimate the situation.

Given it is close to capacity, the highway network is obviously very sensitive to increases in traffic flows. As the junctions are likely to interact, together with the introduction of a signalised crossing on Bickley Road, there is a question whether the modelling will give a good indication of the existing and proposed situations. The additional school flows will only make the situation worse but, from the modelling presented in the TA, it is difficult to assess the level of the impact.

Consistent errors are present throughout the traffic flow figures which are used as the foundation for the junction capacity analysis. The traffic flow

figures do not combine the various traffic scenarios correctly which results in an underestimate of the impacts of the development, particularly on Bickley, Chislehurst and Widmore Road roundabout which is already operating in excess of its capacity. Therefore the junction capacity analysis based on these figures is not fit for purpose.

The significant variation of the results published in both versions of the TA and the sensitivity of the highway network, it is considered that the method of assessing junctions in isolation does not represent a sufficient nor credible analysis. As such, an alternative analysis model should be used to more accurately measure the impact of this development.

The surrounding highway network is already operating significantly in excess of capacity with significant amounts of queues and the introduction of such a large trip attracting land use will compromise the operation of the local road network. No mitigation to address this has been proposed. Given the existing stress on the junctions within the immediate vicinity of the site, the site is not suitable to accommodate the peak hour quantum of additional traffic associated with the proposed land use.

- Draft Travel Plan

A draft School Travel Plan has been submitted with the application. The plan aims to minimise the impacts of the school on the surrounding environment with regard to vehicle trips and congestion. The objectives include the increased use of public transport and walking by both pupils and staff. The report sets out to reduce car travel by 10%, a minimum 10% increase in pupils travelling by sustainable modes and a minimum 20% reduction in staff using single occupancy travel. It identifies walking, cycling and public transport initiatives and measures to reduce staff travelling by car. The report is based on the travel patterns at the girls school nearby and is initially set out for a 5 year period. The report is an ongoing strategy to encourage sustainable travel and will be regularly monitored with surveys every 6 weeks. The plan will be managed by the school with a travel plan co-ordinator appointed and a Steering group set up to include members of the community.

The submission of the Travel Plan is acceptable in principle and is also supported by TfL and the GLA and needs to accord with planning policies and Policy 6.11 of the London Plan. Although questions have been raised by local residents in regard to its implementation and practical benefits, it is a necessary requirement and the proposals are acceptable in principle. Its measures and implementation could be secured by a condition.

- Car Parking

A total of 69 car parking spaces are proposed on site across two car parking areas, one car park for 11 vehicles, including 5 disabled spaces, is to the north of the site by the proposed Sports Hall. The main car park is in the south west of the site with provision for 58 vehicles. There is also a drop off / pick up bay for 10 vehicles on the northern edge of the main car park. A turning area is provided at the end of the car park. Coaches will not enter the

site and it is suggested they will use the nearby bus stops. Although coaches can pick up and drop off passengers at bus stops they cannot wait there. There will also be capacity on-site for 50 cars queuing on the site access road. Links between the car park, school building and sports hall have also now been identified in the revised submission and show full accessibility on the site.

In addition and in accordance with London Plan requirements as requested by the GLA two electric vehicle charging points have been provided in the revised submission in accordance with policy 6.3 of the London Plan.

Parking stress surveys were carried out in roads within an approx. 400m walk distance of the site in May 2016. These were between 0700-1000 and 1430-1830 at 30 minute intervals. They showed that there were a large number of spaces available throughout the survey periods. However, a lot of the spaces are on roads such as Bickley Road and Chislehurst Road, the closest to the site accesses, where parking is likely to cause interference with traffic flows. The nearest roads such as Pines Road and Shawfield Park where parking could reasonably be accommodated are already heavily parked. The surveys submitted do not therefore accurately reflect the existing on-street parking situation and the issues that could be raised.

The TA advises that all vehicles can be accommodated on site and there is no need for parking on public highways, however, in practice it is considered that the proposed car parking provision and measures are unlikely to address the potential of parents preferences.

The assumption with the layout and access arrangements is that parents will drive into the site to drop off and pick up children. However, there are only 10 short term parking bays provided which is well below the estimate of 137 cars. There is space within the site on the access road for vehicles to queue but much of this is single track and so vehicles will be unable to overtake should a car in front be delayed for any reason. Although there is an estimate in the TA of how long it takes to drive through the site there is no assessment of how long it will take to exit onto Bickley Road. This is likely to be an issue given the high volumes of traffic on Bickley Road, particularly in the afternoon, when a large number of vehicles will be trying to leave the site at the same time.

This means that it is highly likely that parents will park and wait on the surrounding road network to avoid going through the site to avoid delays. The two nearest roads to the site, Chislehurst Road and Bickley Road, are likely to be the most attractive and parking here will interfere with the free flow of traffic. Chislehurst Road already has queuing from the mini roundabout going past the proposed access and this will only exacerbate the situation resulting in reduced road safety and exaggerating congestion along Chislehurst Road. Waiting restrictions are unlikely to deter such parking unless there is a Traffic Warden present which is unrealistic on a daily basis.

The site also is intended to be open and be operational after school opening hours and at the weekend for other community uses. The TA indicates that it is intended the activities could include sports, health/community groups and

educational related activities. The traffic would route as per the school, vehicles would enter via Chislehurst Road and exit onto Bickley Road. How car parking and use of the site and one-way system be sufficiently controlled outside of school hours is not clear, however it is advised that staff will always be present on site to address any matters. Parking on the site would accommodate 68 cars and for events where parking demand exceeds the normal provision, for example parents evenings, the two games courts can be utilised and accommodate up to 80 additional cars. This additional event parking provision has been included in the revised submission. This will require marshalling to ensure that level of parking can be achieved and it is outlined that these provisions will be available and the site appropriately managed. This has the potential to be addressed via a condition.

- Construction Traffic Management Plan

A draft Construction Management Plan (CMP) has been submitted to support the application which has been revised since original submission. The plan outlines the management practices to be implemented throughout the period of construction works. It identifies the order of works with the first works providing a new access from Chislehurst Road, hardstanding for car parking and access and the temporary mobile school classrooms. The construction vehicles are to access the site from Chislehurst Road with turning and delivery provided on site. The revised CMP includes 67 car parking spaces for construction workers to be provided on the northern side of the site using the Chislehurst Road access (the original scheme did not provide construction workers car parking). It identified that construction work is expected for a period of 18-24 months and indicative numbers for construction vehicles are provided. It is proposed to set up a Transport Steering group and a Transport Coordinator and the site will be controlled by a Banksman and Booking system for deliveries. Further details are to be discussed before works commence and include measures to minimise noise, vibration and dust from the site. It is expected the final CMP could be controlled through a condition.

The construction of the main school will take place while the first year intake (180 pupils) is on site in temporary accommodation. Although turning and parking areas are shown onsite there is no area identified for material storage.

The approach/egress from the site is restricted by a number of existing features including height restrictions to rail bridges which cross A222 Summer Hill and B264 Old Hill and the A222/B264 roundabout junction at Widmore Road where there is restricted access for vehicles heading north bound that need to turn right ("hairpin" bend that inhibits the turning circle of longer wheel base vehicles).

In order to allow large vehicles to use the Chislehurst Rd / Bickley Road roundabout, turning to/from Widmore Road and Chislehurst Road, the traffic islands at the roundabout would have to be removed. The timescale given for this was up to 18 months. The islands are used by pedestrians, including pupils from Buller's Wood School for Girls, to cross the roads and they also control the deflection of vehicles around the roundabout. Removal of the islands for that period of time would not be acceptable and would result in

highway safety concerns. An alternative would be to route large vehicles around Shawfield Park. This is likely to require waiting restrictions at the junction with Chislehurst Road. The CMP therefore provides an inadequate amount of detail and swept paths conclude that larger vehicles will not be able to manoeuvre onto Chislehurst Road. This could potentially prejudice the safety and operation of the surrounding highway network.

The CMP concludes that full details about the construction programme and vehicle routing will be discussed between Kier, TfL and LBB and could be secured by condition. However, there will be an impact during the construction period and a suitable construction route strategy has not been established which could suggest there is not a suitable route to accommodate construction vehicle access to the site. This therefore has not been resolved and remains a significant highway concern.

Options were looked at for a construction vehicle access from Bickley Road. However, these were discounted due to health and safety concerns due to the potential of conflict between the pupils and construction traffic, the works that would be needed to the internal road layout and the potential for disruption to the flow of traffic on Bickley Road. The existing access cannot be used as it is potentially unsuitable for heavy goods vehicles and the restricted width of the access, due to the wall and trees of 3.5m (although it is set out above that this wall and gates are not the subject of any statutory protection and on that basis their removal may be considered acceptable to secure other benefits).

- Public Transport

Buses: There are over 200 pupils estimated to come to the school by bus and there are two bus stops in proximity to the Bickley Road access. There are no bus stops on Chislehurst Road which forms the main entrance. However, there is currently no nearby crossing point and, given the level of traffic flow, some form of crossing would be needed to enable pupils to cross the road. A puffin crossing has been identified in the TA to allow pupils to cross Bickley Road this would require a contribution towards the cost of these works. For this to be taken forward it will need to be secured via a s106 legal agreement, to date no draft agreement has been submitted. Alternatives could include a traffic island or a zebra crossing however no assessment has been made of these alternatives in the submitted TA.

In addition, the bus stop (north bound) by the exit on Bickley Road will need to be moved 40 metres to the east to accommodate the crossing and provide suitable vision splays for the junction. TfL have agreed to this in principle, however limited details have been provided at this stage and it is expected that the applicant will pay for these works. No mechanism to secure this contribution has been submitted with the application. In addition, it is expected that the south bound bus stop will also need to be enhanced from a 2 bay bus shelter to a 3 bay shelter and TfL have stated that the applicant will need to fund this. No details or potential contribution have been provided.

TfL's response indicates that given the number of pupils, there will be constraints and potential overcrowding on the local bus services (routes 162

and 269). It is expected this will be accommodated but limited clarification on this is available at this stage and TfL have suggested that the applicants may need to contribute towards the enhancement of the bus service and that this needs to be secured in accordance with Policy 6.7 of the London Plan, again no details have been provided. Some pressure on these services could be relieved if the school start and finish times are staggered with the nearby Bullers Wood School for Girls. It is proposed that the Boys School would start at 07:45 and finish at 15:20; the Girls School would start at 08:25 and finish at 15:10. TfL have accepted these staggered times but there does not appear to be much of a difference between the times given the additional distance from the Girl's School to the bus stops on Bickley Road. No details of any mitigation, additional services or measures to meet the additional demand for bus travel has been provided.

Trains: There are 147 pupils estimated to use the train. The footway from Bickley station along Southborough Road towards Bickley Road is relatively narrow. In the morning peak pupils will be walking against the flow of commuters going towards the station and there is a likelihood that pupils will step into the road. The carriageway is also relatively narrow so there is likely to be a conflict with vehicles. The width of the footpaths and roads near the site therefore raises similar concerns to those already discussed in terms of pedestrian safety.

- Cycle Parking

Cycle parking is to be provided on site and a total provision of 36 cycle spaces including 18 Sheffield stands will be provided on the site. These are to be located in two areas, adjacent to the main entrance and to the south of the school building adjacent to the car park. This provision is based on surveys at Bullers Wood Girls School which showed no pupils and only 4% of staff currently cycle, which would generate a need for 7 cycle stands on the site. Highways are therefore satisfied with the level of provision being proposed, however the GLA and TfL required much higher standards in line with guidance in the London Plan. Therefore further spaces have now been provided for up to 120 spaces if more cycle parking facilities are required in the future. These additional spaces would be located to the south of the school building and are considered to address the London Plan requirements.

- Servicing

All servicing and deliveries to the site will take place from the proposed vehicular access on Chislehurst Road and leave via the same access. This includes refuse vehicles. A delivery area and bin store is to be provided adjacent to this access with a dedicated waiting and turning area. Swept paths have been provided for large vehicles and identify the acceptability for vehicles to turn on site and the provision of these facilities. However concerns have been raised over the practical use of this access/exit for service vehicles and how this will be managed. The limited ability to satisfactorily manage or control the use of this point of access for different purposes/users on a daily basis could be problematic and has not been fully addressed.

Use of this access for all servicing vehicles and the location of the bin store also raise issues in respect of increased noise and disturbance from this access and its use and the impact this will have on the amenities of nearby residential properties.

- Other transport considerations

In respect of the temporary accommodation, a prefabricated building will be placed on the southern car park for a year to accommodate the first year intake of 180 pupils and 10 FTE staff while the main school is built. It is now proposed that a 10 bay parent drop off and pick up is provided in addition to 9 spaces for school staff accessed from Bickley Road. This has been revised since submission which originally intended that the temporary accommodation would not be accessible from Bickley Road for parents cars. Nevertheless, the access from Bickley Road is only wide enough for one vehicle at a time and it is not clear how this will work or be managed during drop off and pick up periods.

Any highway works outside of the application site, to facilitate development on site, will be at the expense of the developer/applicant, in accordance with TfL or LB Bromley requirements. Contributions for these highway measures will be required and need to be included in a S106 Legal Agreement. Although there has been consideration by the Applicants of these matters and confirmation that contributions are likely to be forthcoming no head of terms or draft legal agreement has been submitted at the time of reporting to consider these matters further.

- Highways and Transport Conclusions

Given the importance of establishing new schools to meet identified need as clearly set out in government policy, the Local Planning Authority commissioned an independent highways consultant to review the key highways aspects of the application. The key findings of this report are as follows:

- The current proposals are considered potentially unsafe. It is recommended that further consideration is given to the pedestrian facilities with a view to providing a more conventional arrangement which would allow pedestrians exiting the school to dissipate rather than funnelling them to a single point.
- There is therefore currently insufficient information to determine if the drop off and pick up facility will operate effectively and safely.
- It is recommended that the impact of the development is tested using specific two-way trip attraction figures set out in the report rather than those used by the applicant.
- The 7% increase identified in the applicant's TA impact assessment does not prove that the impact will not be severe.
- Other concerns about the methodology for junction modelling used in the applicant's submission are raised

- Mitigation measures should be explored to determine if the impact at the nearby junctions can be brought back closer to the 'without development' scenario thereby ensuring that the impact will not be severe.
- Details of the proposed temporary islands should be provided to give officers comfort that the proposed arrangements are achievable. However, it is recognised that the delivery of CMP would normally be agreed through planning condition and its delivery is unlikely to frustrate the development.
- It is concluded that the applicant has not demonstrated that the residual cumulative impact of the development will fall short of severe in the context of paragraph 32 of the NPPF. As such, further information should be requested from the applicant or the application should be refused.

Any further comments from the applicant further to this report will be reported verbally.

Due to the level of highway and pedestrian safety concerns raised in the above section, the application is considered unacceptable in this regard due to the potential detrimental effect on road safety and free flow of traffic, being contrary to Policy T18 of the UDP 2006. The proposals will prejudice the operation and safety of the surrounding highway network which is contrary to Paragraph 32 of the NPPF (2012).

Design, Layout and Scale

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, 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.

Consistent with this, Policy BE1 of the UDP requires new developments to complement the scale, form, layout and materials of adjacent buildings and areas. Development should not detract from the existing street scene and the space about buildings should provide opportunities to create attractive settings.

The design, site layout and the configuration of the proposed building have been submitted in detail. The proposal includes a combined school and sports hall building, which results in a compact form of development on the site largely on the site of the existing tennis courts. It is proposed to position the school building fairly centrally within the site and this siting allows for most of the existing trees to be retained which also act as a landscaping screen to the main buildings. Two sycamore trees will be lost to enable this proposed siting, which enables the building to be constructed on the most developed part of the existing site, thereby resulting as far as possible, in a reduced impact on the open nature and character of the site.

The form and massing of the proposed building on the site would largely utilise and fit within the topography of the site and the stepped form of the building would appear to be a sensible solution to the changes in ground levels, whilst providing the level of accommodation required. The proposed siting is, nevertheless, in close proximity to existing residential properties (35m) and this does raise concerns in respect of the impact on existing residential amenities and the impact on the street scene. The proposed sports hall will be approximately 10 metres in height and the main school building will have a total height of 12.5m. It is submitted that the proposed building would be largely screened by the existing mature trees of up to 30m in height; however, this in itself will not fully address the visual impact nor the resulting impact on residential amenities.

Notwithstanding the above paragraph, there is limited scope to site the building further away from the boundary, due to the siting of mature and prominent trees on site, including an ancient Yew tree, which have informed the design process and siting of the proposed building. The adjacent/retained trees will also provide a significant level of screening to all boundaries. The applicant has submitted street scene sections and CGI images that show the limited visual impact of the building from outside the site, resulting from the level of existing tree screening and siting of the proposed building. However, an appropriate balance needs to be made between the need to present an appropriate building frontage to Chislehurst Road and Bickley Road, whilst respecting the existing character of these roads and neighbouring residential properties.

Concerns raised that the principle entrance to the school building and site is sited on Chislehurst Road and that this may not be appropriate for a residential road with a residential character, albeit a busy road. Suggestions were made that the principle entrance should be from Bickley Road instead. However the applicants discounted this opinion for a number of reasons set out in the Highways section above.

Significant concerns have been raised by residents over the siting of a large school building close to residential properties. This is compounded by the siting of the vehicular access to the school adjacent to the main building. This matter requires careful consideration in the overall balance of planning considerations.

The design and proposed external facing materials for the new school building are of an acceptable quality. The building will have a modern appearance that reflects its environment and is appropriate for its proposed use. Concerns have been expressed about the exterior cladding shown on the plans and whether it would be the most suitable material for this site. It was suggested that timber elevational treatment to blend the building into the green character of the immediate locality would be the most appropriate solution. However, the applicant has identified that timber would not provide the required 40 year lifespan and coloured cladding, broken up by glazing, alternative cladding and a grey brick to the lower elevation is proposed. The choice of colours proposed will soften the impact of the building on the open nature and character of the site and help blend the building into the site. On balance the appearance of the building would be acceptable.

From a planning (as opposed to technical highways) perspective, the additional access onto Chislehurst Road raises significant concerns regarding the amenity and landscape impacts of an additional access point. There will be an impact on the protected trees and root protection zones and any further loss of trees on the site would not be encouraged. The increased pressure on retained trees also increases with the proposed hardsurfacing on the site.

Visually, the proposed works to the Chislehurst Road frontage are likely to significantly change the character of this part of the site and the street scene. The character of this street will also alter significantly around the entrance to the site with a considerable increase in activity and vehicle and pedestrian movement. This is in addition to the existing use of this route by pupils travelling to the existing Bullers Wood Girls School. The consultation responses from neighbouring residential properties would raise significant additional concerns regarding safety and the impact on residential amenities and at this stage concern would continue to be raised with the proposed approach to the Chislehurst Road frontage.

The impact of the development to Bickley Road and Pines Road will be acceptable in visual amenity terms.

It is proposed to reinstate an existing roadway within the site that will require resurfacing to be brought up to standard. This loops through the trees on the north western corner of the site and addresses the impact on the trees in close proximity and their root systems. These aspects do increase the level of built development on site, which has been the intention to minimise as far as possible in terms of the built form. The plans submitted also result in an overly complicated layout that appears to be designed in part around reinstating this access road which results in limited benefits and is at odds with the need to minimise development.

Accessibility was raised as an issue by the GLA in the Stage 1 referral – additional details provided that satisfy these concerns and provide a level and safe means of access between different aspects of the site and buildings.

In conclusion, the design, scale and layout of the buildings is considered on balance to be acceptable, however there are concerns around the treatment

of the Chislehurst Road frontage and this raises a question of whether overall the proposal can be considered to comply with Policy BE1 of the UDP.

Residential Amenity

In determining any application, a key consideration would be the impact of the development on the amenities of neighbouring properties. Policy BE1 of the UDP requires development proposals to safeguard the residential amenities of the area by ensuring that the current living conditions of occupiers of neighbouring buildings are not harmed through noise and disturbance or by inadequate daylight, sunlight, privacy or overshadowing.

There is the potential for the proposal to result in harm to residential amenities as a result of the siting of the building, intensification of the use of the site, location of the new vehicular access point, car parking area and access road and the use of any additional sports pitches/outdoor facilities. Concern is raised specifically in relation to the siting of the school building in close proximity to the boundary at Chislehurst Road and the new vehicular access from Chislehurst Road.

The proposal to set the building behind existing tree screening will provide some mitigation to the development impact. Further, the new vehicular access to the site has been positioned/sited to allow a view through the site and of the games area rather than the proposed school building. Again, this will assist in minimising the visual impact to some extent. On balance the impact of the built development on residential amenities is considered acceptable.

Use of the Chislehurst Road access for all servicing vehicles and the location of the bin store in this area also raises issues in respect of increased noise and disturbance in this location, and the impact this will have on the amenities of nearby residential properties. Whilst there are concerns about the access from a technical highway viewpoint, on balance the impact of the new access on Chislehurst Road on residential amenities would not be so severe as to warrant a refusal, in particular as this would be primarily an access as opposed to an exit (deliveries would exit here but this would not result in substantial traffic movements), so this limits any waiting traffic that you would find when exiting a site.

The proposed activities associated with all elements of the proposal could also give rise to a degree of noise and disturbance to local residents, in particular any out of school hours uses. However, the benefits of the wider use of the facility and the vegetation screen around most of the site along with the distance of the facilities to be used means that it is considered that the proposed Community Use Agreements, along with appropriate conditions restricting hours of operation and lighting etc, are considered an acceptable way of mitigating any impact on neighbouring properties in terms of potential activities, noise and disturbance and on balance this impact may be considered acceptable.

Overall, whilst the proposal will clearly alter the residential environment, there is not considered to be any substantial harm identified that would conflict with development plan policies and warrant refusal of the application in this regard.

Trees and Landscaping

Policy NE7 requires proposals for new development to take particular account of existing trees and landscape features on the site and adjoining land and Policy BE1 requires proposals to respect existing landscape features.

The site is covered by a Tree Preservation Order and all the trees are protected. The site still shows signs of its past use, mainly by the trees present as the size and species show that they were landscape features of the manor house which used to be located on the site. This includes an avenue of old pollarded Lime trees and established tree groups. There are a total of 90 individual trees, 16 groups and 1 woodland. This includes an ancient Yew tree to the south of the site which is a significant constraint to development.

An Arboricultural Report and Arboricultural Impact Assessment have been submitted in support of the application and undertaken in accordance with BS 5837:2012. 15 trees have been categorised as 'A' grade trees of high quality and value, 54 trees, 8 groups and 1 woodland have been categorised as 'B' grade of moderate quality and value and 21 trees and 8 groups have been categorised as 'C' grade trees of low quality and value.

It is proposed to remove 5 'B' grade trees, a section of 1 'B' grade group, a section of 1 'B' grade woodland, 5 'C' grade trees and 1 'C' grade group to facilitate development and the impact to amenity should be minimal. Root protection zones (RPZ) have been identified and a preliminary tree protection plan has been produced. Any works within a RPZ which includes the existing access road and new footpaths would be conducted using a minimal dig methodology and use cellular webbing.

The design and layout of the proposal has given consideration to the impact of the development on the protected trees with most being retained and protected. The proposed school block is sited on the current tennis courts and therefore results in a minimal loss of trees on the site. The information provided as part of the Arboricultural Report has addressed the tree constraints and indicates the possibility of development with the retention of important trees. The tree works proposed are well justified and are proposed on the basis of good arboricultural management. The significant trees worthy of retention are incorporated into the scheme without any detrimental impact. The loss of trees on the site and the proposed works are therefore acceptable and in accordance with planning policies and recognized arboricultural practice.

All outstanding matters and a full and detailed landscaping scheme could therefore be required by conditions to include proposed areas of hard surfaces and soft landscaping, a final Tree Protection Plan and Arboricultural Method Statement in order to protect and retain the trees on site and details of

protective fencing during the course of building work.

Temporary Accommodation and Phasing

Due to the timescales involved in this proposal there is a need to provide temporary accommodation on site in the form of a two storey mobile classroom structure, with associated, access, drop-off area, car parking and outside play space. Details of this provision and siting are included within the submission. There is a requirement to open the school in September 2017 due to the intake this year and therefore a temporary building would be required for a period of 1 year which would be sited close to the Bickley Road boundary to accommodate up to 180 pupils. The temporary building is to be sited on the site of the main school car park and fencing off from the rest of the site during construction. It was originally submitted that parents would not be able to access the site for this first year which was not an appropriate solution. Access arrangements from Bickley Road and a drop-off area have now been provided for the temporary facilities.

The siting of the temporary facilities are well screened from the road and will utilise the existing vehicular access into and out of the site. Being of a temporary nature there is no objection to this aspect of the proposal for the first year during construction.

Continued use of the sports facilities on site by the Girls School has been outlined to maintain appropriate provision of sports and playing pitch facilities throughout the construction stages and on an on-going basis.

It is also noted that the replacement on-site ATC base/facilities have been identified in the submission. With facilities temporary provided off-site during the construction phase with access to meeting space to be provided within the main school building once completed.

It is noted that the original schedule included a start date for construction of January 2017 and the main school building to be ready for occupation by September 2018.

Planning Contributions

Policy IMP1 (Planning Obligations) and the Council's Planning Obligations SPD states that the Council will, where appropriate, enter into legal agreements with developers, and seek the attainment of planning obligations in accordance with Government Guidance. A Section 106 (S106) Legal Agreement or Unilateral Undertaking is required. The draft Heads of Term would need to be agreed in principle and would need to include:

- Potential Carbon offsetting contribution
- Contribution towards cost of repositioning north bound bus stop and extending the size of the south bound bus shelter on Bickley Road
- Potential contribution towards mitigation of capacity issues on the local bus network

- Highway puffin crossing works/contribution or similar
- Other highway works as may be required
- Travel Plan
- Reimbursement of the Councils legal costs.

At the time of reporting no heads of terms or draft agreement has been received.

Other Technical issues

- Ecology and Protected Species (Bats)

The planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes; minimising impacts on biodiversity and providing net gains in biodiversity where possible. The NPPF addresses ecology in paragraph 109 which states, the planning system should aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitments, which include establishing ecological networks that are more resilient to current and future pressures. Paragraph 118 of the NPPF also states that opportunities to incorporate biodiversity in and around developments should be encouraged. UDP Policies NE2, NE3 and NE5 seek to protect wildlife features and protected species requiring development proposals to incorporate appropriate mitigation where damage may occur.

The site has the potential to support wildlife habitats and protected species. A Preliminary Ecological Appraisal and Bat Report have been submitted in support of the application to determine the ecological value of the site, its habitats and if there are any protected species on the site. The pavilion building and ten onsite trees have potential to support roosting bats. Small areas of vegetation suitable for reptiles will be removed to facilitate development. The ecological appraisal concluded that a bat survey was required.

The Bat Report observed no bats emerging from the potential bat roosting features and it is unlikely that bats are roosting within the pavilion. Bats are using the site and to ensure the grounds remain suitable for bat foraging and roosting, external lighting shall be minimised wherever possible, especially in the vicinity of boundary vegetation and trees that support features suitable for roosting bats. Further tree surveys will be required if illumination of any trees and used to inform mitigation and licensing requirements. Enhancement measures should include bat boxes affixed to boundary trees in dark areas. Further tree surveys (if required) and bat mitigation measures could be controlled through conditions.

Other site enhancement measures include the establishment of a new hedgerow section on the northern boundary, establishment of rough grass margins and the inclusion of nest bricks within the new building for house sparrow and starling. Other precautionary measures are advised during

construction stages and these could all be controlled through suitably worded conditions. The development would therefore be in accordance with the above policies.

- External Lighting

An External Lighting Report was submitted with the application and details the external lighting provision proposed to illuminate the school site, which includes pedestrian walkways, roadways and car parks. Details of the type of lighting and its location on site are submitted. Roads will be illuminated by LED bollard lighting which limits overspill, car parks with 3m LED column lights and pedestrian pathways by bulkhead lights or low level bollard lighting. These will all be controlled via a photo cell to turn the lights on at dusk and turn them off at dawn, all lighting will be turned off at 22.00 until 07.00. The lighting scheme will use warm white LED lighting which shall be directed to ground and light spill minimised. This scheme addresses the use of the site by bats and minimises light pollution to other parts of the site and the wider area addressing the requirements of para. 125 of the NPPF.

- Air Quality

An Air Quality Assessment has been submitted in support of the application. The site is situated outside an Air Quality Management Area (AQMA). The Air Quality Assessment is to determine the impact of emissions from road traffic on sensitive receptors. Additional car journeys generated by the development have been considered and will not have a significant impact on local pollutant concentrations. The assessment is in relation to the exposure of occupants of the new development rather than the impact of development.

Predicted concentrations have been compared with air quality objectives and indicate the annual mean NO₂ concentrations are below the objective in the worst case scenario. Concentrations of PM₁₀ are predicted to be within the annual mean objective in 2019. It also identified a need to extend the distance between the school buildings and outdoor play areas with the A222 road source to reduce exposure of children and school users to elevated pollutant levels. Additional information submitted includes the addition of an air quality monitor on the northern boundary before and during construction to log data electronically and allow this information to be monitored.

The development therefore meets the London Plan requirements that new developments are air neutral and air quality impact in the local area as a result of this development is not expected to be significant. Conditions have been recommended to ensure and address any matters which could subsequently affect air quality and which could be attached to any approval.

- Acoustic Assessment

A noise impact assessment has been submitted which determines the appropriate levels of background noise and the noise associated with various aspects of the proposed use in accordance with policy 7.15 of the London

Plan and the NPPF. The calculations identify that the internal noise levels for the school will be acceptable and due to the background noise levels there will be no requirement for enhanced acoustic glazing on the main school building, noise levels are expected to be limited to levels which are compliant to known standards when the proposed ventilation strategy of openable windows is implemented. The sports hall will have natural ventilation methods such as louvered openings and wind catchers and will require minimal attenuation. The noise levels will comply with relevant standards and the impact of noise from the car park and usage of the external areas is expected to be minor adverse in the short term, reducing to negligible in the long term. It is confirmed that all the potential noise issues could be controlled through appropriate conditions in accordance with Policy 7.15 of the London Plan.

The report does not, however, address noise from the school and site and its impact on local residents and their amenities which requires consideration in respect of the impact on local residents and their amenities to fully comply with the requirements of Policy 7.15 of the London Plan.

- Sustainability and Renewable Energy

The London Plan provides the policy framework in respect of sustainable construction and renewable energy, and in particular Chapter 5 of the London Plan (in particular policies 5.3 & 5.6) and the Supplementary Planning Guidance entitled Sustainable Design and Construction. In addition, Policy BE1(vi) of the UDP, regarding sustainable design, construction and renewable energy is also relevant.

The application is accompanied by an Energy Report, District Heating Strategy, Summertime Overheating Report and Ventilation Statement which identifies how the need for energy is to be minimised and controlled throughout the lifetime of the development, design principles and in accordance with the energy hierarchy, London Plan policies and the SPG. The development has been designed to use less energy; is to be supplied as efficiently as possible and should use renewable energy where feasible. The Energy Statement shows how the development will provide energy efficiency savings that exceed the requirements of the Building Regulations 2013 by 7% including calculations of both carbon dioxide emissions and energy (in kWh).

The Energy Statement has considered the options for renewable energy, low and zero carbon technologies and demonstrated the feasibility of installing Solar PV panels as the most appropriate renewable energy solutions. The proposed installation of PV panels provides further energy savings and are expected to reduce Co2 emissions by a total of 21%.

The GLA in their Stage 1 response requested further information and clarification to show how the development accords with Policy 5.9 "Overheating and Cooling", how ventilation is to be controlled and whether there are options to connect to a District Heating Network, a detailed roof layout for the proposed PV installation and the shortfall in carbon emissions to be met off-site. These details have now all been submitted. This additional

information and the energy strategy is broadly supported and in line with policy expectations and the requirements of the GLA.

The reduction in co2 emissions falls short of the required 35% required under Policy 5.2 of the London Plan therefore a carbon offsetting payment would be payable based on GLA rates. This could be dealt with through a s106 legal agreement. However, the applicant has stated that an additional off-setting payment will not be offered due to the school being Government funded and the need to use these funds for the required provision of the school. This position has not been considered further by the GLA. Nevertheless, this is a significant improvement on the original position which did not include the provision of PV panels and therefore only a 9% carbon saving. It is not considered that such a shortfall should be the subject of a reason for refusal although the proposal does not fully comply with the energy policies and requirements identified in the London Plan and SPG.

- Conservation Area

The site lies adjacent to Bickley Park Conservation Area. Therefore Policy BE13 of the UDP and para 129 of the NPPF are relevant to development adjacent to a conservation area. Consideration of whether the proposal preserves or enhances the character and appearance of the Conservation Area (a heritage asset) is required. In addition, the function of the proposed use and whether this impacts on the character of the Conservation Area needs to be assessed.

The Conservation Area boundary includes the front gardens of the houses on the eastern side of Pines Road but not the road itself. There is substantial screening along the eastern side of the site even in the winter and there is a significant separation between the proposed school building and the boundary of the Conservation Area. Given the separation and screening important views into and out of the Conservation Area would not be affected and not from any public vantage points. Some glimpses of the new building would be visible from some locations but given how limited these would be it is considered that no harm would be caused. The existing school playing fields will be retained as a substantial parcel of open land and the development would not appear overbearing or cramped and the character and appearance of the Conservation Area will be preserved. The function of the proposed use with no direct access from Pines Road which is already heavily parked during the day is unlikely to have a bearing on the character of the Conservation Area or cause any harm due to any increase in traffic that may result.

The proposal is therefore considered to preserve the character and appearance of the adjacent Conservation Area and accords with Policies BE13 of the UDP, 7.8 of the London Plan and para.129 of the NPPF.

- Archaeology

An Archaeological Desk-Based Assessment and Written Scheme of Investigation have been submitted in support of the application. The assessment did not identify any currently known archaeological remains,

although there is potential for buried archaeological remains to be present, particularly associated with the Widmore estate within the northern part of the site. It is recommended a geophysical survey should be undertaken as a first phase of a staged scheme of evaluation. The results can determine the best location for the proposed works and service trenches and if further works are appropriate. Several tree-lines and wooded areas have been identified within the boundaries of the proposed development area as qualifying as 'historically important' it is recommended that any changes to these assets be avoided or minimised.

The scheme of evaluation provides a programme and methodology for undertaking the works and the procedures for analysis and reporting. This evaluation would comprise fairly limited trenching on site to determine the presence or not of any quarries. Historic England (Archaeology) have recommended a two-stage condition in respect of further archaeological investigation and possible mitigation which would safeguard any potential archaeology and could be attached to any approval in line with NPPF guidance and Policies BE16 of the UDP and 7.8 of the London Plan.

- Flood Risk Assessment + Sustainable Urban Drainage System (SUDS)

The site is within Flood Zone 1 and at a low risk of flooding, however in view of the size of the site (over 1 ha) a Flood Risk Assessment was required. The proposed development results in no greater risk to surface water flooding. The proposed surface water drainage system includes infiltration drainage and onsite storage/attenuation in the car park. Surface water drainage rates will be retained at greenfield rates in line with guidance. The principle of the drainage strategy for the site is considered to fulfil SUDS requirements and is acceptable and in line with agreed standards. A condition to ensure full compliance with the drainage statement could be attached.

- Contaminated Land

A Phase 1 Desk Study and Preliminary Risk Assessment and Phase 2 Ground Investigation Report has accompanied the application which has identified hydrocarbon contaminants and a potential risk to human health. Further investigation and remediation measures are therefore required and it is likely that a suspended ground floor slab will be required. However, a condition could be attached to any planning permission securing a contaminated land assessment and an appropriate remediation strategy, which could address all these aspects appropriately in accordance with Policy ER7 of the UDP.

- Secured by Design

The proposal needs to incorporate Secured by Design principles (as required by Policy BE1 (vii)) and H7 (vii) to take account of crime prevention and community safety. Paragraphs 58 and 69 of the NPPF are relevant. Compliance with the guidance in Secured by Design and the adoption of these standards will help reduce the opportunity for crime, creating a safer, more secure and sustainable

environment. A condition securing measures to minimise the risk of crime could be attached to any planning permission.

- Environmental Impact Assessment

As the site has an area of over 1ha it was necessary to “screen” an application as to whether it requires to be accompanied by an Environmental Assessment under the Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2015. The screening process identified that an EIA was not required for the proposed school and a formal opinion was issued on 5th August 2016.

Conclusions

The educational need for a new secondary school is fully acknowledged, and in the assessment of this application regard has been had to paragraph 72 of the NPPF (March 2012) which requires Local Planning Authorities to “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.” The applicant did engage in pre-application discussions with the Council, and there has been regular dialogue throughout the application process in attempts to resolve the matters of concern with this application.

In assessing this application, careful consideration has been given the government’s planning and educational policy statement from 2011 in particular: *“A refusal of any application for a state-funded school, or the imposition of conditions, will have to be clearly justified by the local planning authority. Given the strong policy support for improving state education, the Secretary of State will be minded to consider such a refusal or imposition of conditions to be unreasonable conduct, unless it is supported by clear and cogent evidence.”*

This application proposes a substantial development for a new secondary school on land current designated as Urban Open Space in the UDP, contrary to UDP Policy G8 and London Plan Policy 7.18. However a clear educational need for a new school has been demonstrated and the principle of the development of the site for a school is supported by the allocation of the site for a new school in the Bromley Draft Local Plan, (albeit that this draft plan has limited weight in the decision making process).

New school development to meet identified need is strongly supported through current government policy. The choice of this site has been substantiated by the submission of a detailed and comprehensive site selection study. Despite the conflict with the current Urban Open Space Policy G8, on the basis of the clearly identified need and site selection process undertaken by both the applicant and as part of the Local Plan process, the principle of a new secondary school on this site is considered acceptable as the need for a school would justify the setting aside of Policy G8 given the

demonstrated and imminent requirement for school places in the Borough, provided that site specific planning requirements can be met.

The proposed temporary accommodation is considered acceptable as part of the wider proposal for a school at the site for the reasons set out in the report.

There remains an objection from Sport England relating to the loss of playing field space, however in the overall assessment of the application, this matter is not considered to be so serious as to warrant refusal when considering the overall benefits of the new school as set out in the report. If permission was granted the application would need to be referred to the Secretary of State on the basis of Sport England's formal objection.

With regard to highways matters, Paragraph 32 of the NPPF sets out that planning decisions should take into account: whether:

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- safe and suitable access to the site can be achieved for all people; and improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development.
- Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

The views of the Council's Highway Engineer are that the proposal will result in severe impacts on the highways network both in terms of capacity and flow, and also pedestrian safety, thus making the proposal contrary to Policy T18 of the UDP and paragraph 32 of the NPPF. Specifically the new access to Chislehurst Road raises particular concerns which are detailed in the highways section of this report.

There will be an impact on the amenities of nearby residents as a result of this proposal and specifically there will be a change in the character of Chislehurst Road in the proximity of the new access. Whilst it would be desirable for access to the site to avoid Chislehurst Road altogether, the impact on residential amenities of this proposal would not be such a significant concern as to outweigh the benefits of a new school in light of the clear government policies on this matter.

The overall design, scale and layout of the development is considered to be acceptable and in accordance with policies. Whilst there are some concerns about the impact of the development given its proximity to some residential properties, these are not so severe as to warrant refusal and taking into account the benefits of the scheme this matter is considered acceptable.

Whilst the proposed development is, on balance considered to be acceptable in terms of all of the matters set out in the body of the report and related policies, unfortunately despite attempts to persuade the applicant to address these matters further, there remain a number of serious concerns about this

specific proposal in relation to vehicular and pedestrian safety and the impact on the highway network.

Given the strength of government policy supporting new school applications an independent consultant was engaged by the Local Planning Authority to provide a report to assess the highways aspects of the development. This report concludes that the applicant has not demonstrated that the residual cumulative impact of the development will fall short of severe in the context of paragraph 32 of the NPPF.

Careful consideration has been given to all the representations from the public and matters raised within these have been addressed in the considerations set out in this report.

Taking all of the planning considerations set out in this report into consideration, despite the clear need for new secondary school places, on balance the technical highways concerns raised are so severe that the proposal would not accord with development plan policy and it is recommended that on the basis of the application as submitted, permission be refused for these reasons.

The Mayor of London has stated that the application would not need to be referred back to him should it be refused, however it would need to be referred back if it was resolved that permission should be granted.

Background papers referred to during the production of this report include all correspondence on file ref: 02/01003/FULL1, 95/02264/FULMAJ 16/03315/FULL1 and 16/03145/OUT excluding exempt information.

RECOMMENDATION: PERMISSION BE REFUSED

Reasons for Refusal:

- 1. The potential traffic generation and capacity of the existing highway network along with the proposed access arrangements raise both road and pedestrian safety concerns that have not been fully addressed in the proposal and are likely to cause serve cumulative impacts contrary to Policy T18 of the Unitary Development Plan 2006 and paragraph 32 of the National Planning Policy Framework 2012.**