

Application No : 16/03145/OUT

**Ward:
Kelsey And Eden Park**

**Address : South Suburban Co Op Society
Balmoral Avenue
Beckenham
BR3 3RD**

OS Grid Ref: E: 536356 N: 168111

Applicant : E21C

Objections : YES

Description of Development:

Outline application for the erection of 2 buildings of two to three storeys comprising 13,508 square metres (Gross External Area) of Class D1 floorspace to provide an 8 form entry plus 6th form school (up to 1,680 pupils) and sports hall, 17,200 square metres for playing fields, 2,190 square metres Multi Use Games Area with community use and associated development including car parking spaces, cycle parking spaces, floodlighting, new pedestrian and vehicular accesses, servicing and storage.

Key designations

Biggin Hill Safeguarding Area
London City Airport Safeguarding
Smoke Control SCA 15
Urban Open Space

Proposal

Outline planning permission is sought for a new 8 form entry (FE) secondary school Eden Park High School plus a sixth form accommodating a total of 1,680 students (1200 secondary pupils and 480 sixth form pupils) and approximately 120 staff by the time the school is fully occupied in 2023. The proposed school would be operated by the E21C multi-Academy Trust which includes Ravensbourne School, Hayes.

The application seeks determination of the scale, layout and access at Outline stage with appearance and landscaping retained as reserved matters for later consideration.

There is no temporary accommodation for pupils proposed in this application as this is the subject of a separate application on a different site. Members should note that an application for the temporary siting of a two-storey structure for educational use (Class D1) for two academic years (until 31 July 2019) and associated external works including access ramp and stairs at Ravensbourne School for Eden Park High School (ref 16/04712) also appears on this Agenda.

The form of development will comprise the following elements:

Building and Works

- The main school building will be U shaped and located in the south east corner of the site. It will comprise 12,067 sqm (gross external area (GEA)) of floorspace spread over 3 storeys and the building will be 12.9m high. The width of the northeast elevation of the building will be approximately 61m and the wings will extend 87m and 93 m respectively. Between the wings will be a communal open space designed to be an informal recreation space for pupils including an outdoor dining space.
- The sports hall will be located close to the eastern boundary and will comprise 1400 sqm (GEA) of floorspace. The building will be 9m high and measure 42m by 42.8m.
- Both buildings will be flat roofed. Details of the appearance of the buildings have not been provided as the applicant has requested these to be dealt with as reserved matters
- The total GEA for the school buildings is 13,508 sqm.
- The boundary to the overall site will comprise partly a 1.8m palisade fence and partly a 1.8m acoustic boundary fence.
- The site levels reduce by approximately 3m across the site from the southern boundary towards Balmoral Avenue.

Car and cycle parking, servicing and access arrangements

- There are 2 vehicle access points shown on the submitted plans.
- A new one way entrance is shown set back from the eastern side of the Balmoral Avenue frontage. The gates to this access will be set back approximately 5m from Balmoral Avenue.
- A secondary vehicle access for exit only is proposed centrally within the site frontage. The configuration of this exit will be designed to prevent right turn from this exit.
- There are 2 pedestrian access points shown on the submitted plans
- A dedicated pedestrian/cycle access point is provided at the western end of the frontage and the entrance is set back to provide a wider pavement at this point. A dedicated pathway will around the top of the car park and follow the internal access road to the main school buildings.
- A further pedestrian entrance will be provided adjacent to north eastern boundary and will link to the pathway to the school buildings. A zebra crossing will be provided where this path crosses the main internal access road to the school buildings.
- 2 car parks are proposed as follows:
 - The main car park is located to the rear of the site along part of the eastern and southern boundaries and near the main entrance to the school. It provides 58 parking bays, plus 5 disabled spaces and 4 larger spaces for mini bus parking.

Access to this car park will be via a straight single width carriageway with several passing places along the eastern boundary.

- A secondary car park (the frontage car park) is located along the northern boundary adjacent to Balmoral Avenue. This will provide car parking spaces for 40 vehicles and a drop off zone is provided for single storey coaches.
- Total number of spaces is 103 for staff and visitors plus 4 minibus spaces.
- A substation building is also shown within the frontage car park
- 242 cycle parking spaces will be provided in a covered store on the north side of the main school building.
- A plan has been submitted showing access capability for refuse, delivery and emergency vehicles.

Trees and landscaping

- The Tree Survey identifies the removal of 2 Category C trees and 20 Category U trees (the U category trees should be removed for arboricultural reasons irrespective of the development). Three hedges located internally within the site will also be removed.
- No Category A or B trees will be removed
- The row of mature and semi-mature Hornbeam trees along the eastern boundary require a reduction in the crown branches for good arboricultural management. The proposed building is shown to be set back 17.5m from this boundary.
- The row of mature and semi-mature lime trees along the western boundary have significant deadwood throughout the crowns which should be removed for good arboricultural management.
- Details of proposed landscaping have not been submitted as these will be considered as reserved matters should the planning application be approved. The Design and Access statement advises that buffer planting will be provided to reinforce the boundaries and bat and bird boxes located across the site. Also, internal landscaping will be provided to the communal areas.

Outdoor sports facilities

- 1 full size football pitch (9,650 sqm including run off). This will be located along the eastern boundary between the frontage car park and the sports hall and will be enclosed by a 1.2m fence. The pitch will be used by the school on weekdays and weekends with floodlighting until 18.30 on weekdays only.
- 1 multi-use games area (MUGA) (2,190 sqm) with court markings will be located in the centre of the site adjacent to the main school building and sports hall. The MUGA will be enclosed by a 3m weld mesh fence. The MUGA will be available for out of hours community use at evenings and weekends (the latter daytime only) and will be floodlit until 21.00 on weekdays. 2

- 2 Under 13/14 grass football pitches (3,760 sqm including run off) will be located along the western and part of the northern boundaries respectively.
- 2 grass training areas (25mx25m each) will be located near the southern and eastern boundaries respectively
- The total floorspace for outdoor recreation facilities will be 17,200 sqm.

Application Submission

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

Planning Statement: This statement seeks to describe the site and surrounding area and sets out the applicant's case in support of the proposal explaining how it addresses the development plan policy requirements and other material considerations.

Design and Access Statement: This statement sets out an assessment of the site and surrounding area and the rationale for the proposal having regard to relevant development plan policies. The statement confirms the amount of development proposed, parking strategy, refuse and sustainability strategy. The statement discusses the approach to access, landscaping and appearance of the development.

Landscape and Visual Impact Assessment: This report provides an analysis of the landscape effect and the visual impact of the proposed development. In terms of landscape effect the report concludes that this will be neutral. In terms of the visual effect there are 7 locations around the site where the development will have a substantial or moderate/substantial effect, the majority of which are at close range. The report suggests mitigation measures in the form of planting and sensitive use of materials for the building fabric and internal fence lines.

The landscape is defined as medium value at a local level. The site appraisal advises that whilst the proposal will cause change to the immediate landscape character of the site, the impact will be very local and within the wider urban townscape there will be very little change. Therefore, the landscape effect is defined as neutral in this respect.

In terms of the visual impact of the development the report finds there is substantial or moderate/substantial impact from the following viewpoints, the majority of which are at close range with one medium range:

- From rear upper windows of properties at 155-195 Upper Elmers End Road
- Upper windows of properties in Mountbatten Close
- From properties number 86-62 on the northern side of Balmoral Avenue
- Upper rear windows of properties along southern side of Eden Park Avenue
- Upper windows of 3 properties on east side of Stanhope Grove.

- Views from boundary fence with Stanhope Grove Playing Fields and Beckenham Rugby Club pitches

The report considers mitigation measures and comments on the effectiveness of these measures. The level of significance is primarily due to the site's location in a built up residential area and 5 of the affected viewpoints are from upper floor windows of adjacent properties that have views into the site, particularly during winter months. Whilst the effect is significant it is localised to these residents and will be less substantial when tree canopies are in leaf. Mitigation measures include sensitive selection of materials for the building fabric and internal fence lines and planting of trees and shrubs will provide more effective screening once they have become established.

Transport Assessment and associated documents: The original TA has been updated since the original submission with later documents from the applicants Highway Consultant on November 28th and December 21st 2016. A draft School Travel Plan was received on January 3rd 2017.

A detailed Transport Assessment has been submitted which includes descriptions of the existing road network, on-street parking survey, local walking and cycling facilities, traffic surveys for junctions at Balmoral Avenue/Upper Elmers End Road, Balmoral Avenue/Eden Park Avenue, Eden Park Avenue/Croydon Road and Dunbar Avenue/Eden Park Avenue, on-street parking survey and accident data. The report also shows junction details and vehicle swept paths for emergency access and deliveries.

For the proposed development, the main vehicle entrance will be adjacent to the northern boundary of the Balmoral Avenue site frontage with a further separate exit only egress in the approximate centre of the site. The main car park for staff and visitors will have 63 car spaces (including 5 disabled bays) and 4 mini bus spaces and will be located adjacent to the main school building. A smaller car park for staff and visitors with 40 spaces will be located adjacent to the frontage of the site with a coach drop-off and pick-up lay-by at the rear of the car park. This area will also be used for dropping off and picking up pupils but there will not be the facility to park within the site as the frontage spaces are for staff parking only.

There will be a dedicated pedestrian access from Balmoral Avenue alongside the western boundary with another on the eastern boundary alongside the vehicle entrance roadway to serve pupils coming from the north and the south and to avoid pupils crossing proposed vehicle access and egress points. Pupils will then use a dedicated footway alongside the main internal access road to reach the school buildings. The report indicates that there are a sufficient number of car parking spaces to accommodate all predicted staff parking.

The applicant advises that the full capacity of the school will be up to 1680 pupils with numbers gradually increasing year on year from September 2019 until the school is fully operational in 2025. The school is non-selective and

open to all applicants. The school operating hours will be 08.30 to 17.30. The applicant has advised that 6th form pupils will leave at 5pm.

The peak times for traffic activity will fall within the periods of 0745 to 0845 and 1700 to 1800. The site has a PTAL rating of 3 at the school gate and 1b at the main school building entrance.

In terms of proposed traffic levels, a 'hands up' survey at Ravensbourne School has been used to determine the number of staff and pupils that will use car borne modes of transport. For pupils, the report forecasts 227 car arrivals and departures along Balmoral Avenue, Upper Elmers End Road and Eden Park Avenue in the AM peak and 182 in the PM peak. The applicant predicts that this will be reduced to 89 in the AM peak and 50 in the PM peak when the Travel Plan is fully in place.

In terms of on-street parking, the worst-case scenario for when the school is running at full capacity would result in a demand for 227 spaces in the AM peak and 182 in the PM peak, assuming that all car borne pupils arrive and depart at the same time. The on-street parking survey provided by the applicant indicates that there would be an average of 102 vacant on street spaces in the AM peak and 114 in the PM peak. The applicant has advised that there is other on-street parking in the wider area. Taking this into account there would sufficient on-street spaces but they would be spread further away from the school. This does not take account of the potential drop/off and pick up within the frontage car park on the site which would provide off street space for approximately 150 to 225 drop offs. Taking this into account it is considered that there would be sufficient space to accommodate the predicted car borne pupils. The applicant also predicts that the demand referred to above would be reduced through the school Travel Plan.

In terms of the impact on the highway network, 4 junctions (listed above) were assessed for existing and predicted capacity, delays and queuing. The report finds that the Eden Park Avenue/Croydon Road junction is already over capacity in terms of queuing traffic for two 15 minute period in the AM peak. Taking account of vehicle generation for pupils only this would increase the length of queues at this junction for two 15 minute periods in the AM peak. The applicant advises that this will reduce once a Travel Plan has been approved and implemented.

Revised plans have been submitted showing an amended layout to the exit only access which will prevent right turn from this exit resulting in left turn only manoeuvre into Balmoral Avenue. This will direct traffic using the on-site pick up and drop off facility away from the Balmoral/Eden Park Road and Eden Park Road/Croydon Road junctions. Revised traffic flow data has also been submitted to assess the impact of this alteration on these junctions and the Balmoral Avenue/Upper Elmers End Road junction.

A total of 242 cycle spaces will be provided.

The impact of the proposed community use is assessed in the document dated November 28th 2016. Community use will start at 18.00 and the site will be cleared by 21.30 on weekdays and from 09.00 to 16.00 on Saturdays and Sundays. The applicant predicts that use of the school hall and dance studio could generate up to 80 people and the MUGA could generate up to 72 people at any one time totalling 152 people, if each of these facilities was being used to its maximum extent at the same time. It is not proposed that the grass pitches would be used for community use in the evenings or weekends.

Road Safety Audit and Designers Response: This relates to the new site access and egress to Balmoral Avenue only and recommends the relocation of gullies away from the junction bellmouths, review of the impact of street trees on the junction visibility, footways should be provided where vehicle accesses can be used by pedestrians. The designer's response is that the gullies will be relocated, the location of trees that could affect the junction will be identified and the trees relocated or their foliage reduced where necessary and speed humps on the site accesses close to the footway will be provided to minimise vehicle speeds as they approach the path of any pedestrians crossing the junctions.

Travel Plan: The Travel Plan seeks to encourage staff and pupils to use alternative sustainable means of travel to and from school in such a way as to reduce car borne trips. The Travel Plan Coordinator appointed by the school will work with the Council's Travel Plan Officer to identify measures to achieve this objective. This will apply to the temporary school and this will set the ethos for good practice at the permanent school when it opens.

It should be noted that Ravensbourne School (operated by the applicant) already operates a Travel Plan that has been awarded a Gold accreditation under the 'STARS' programme and the experience of this school will be passed on to Eden Park High School staff and demonstrates the commitment of the Trust have in improving sustainable travel.

The plan does refer to the possibility of staggering the start and finish time of sixth form pupils when they are introduced to Eden Park High School to help disperse arrival and departure activity from the peak period.

Surface Water Drainage Strategy: The aim of the SWDS is to demonstrate the site can manage the surface water runoff from the new development in such a way to mitigate the impact of the new development on adjacent property. Following comments from the Council's Drainage Officer, a revised Surface Water Strategy was received in December 2016 which provided additional information.

The desk top 'Flood Risk Assessment' study has identified that the proposed development is located mostly in Flood Zone 1, with a small area within Flood Zone 2 and 3. It can be concluded that, providing the recommendations in the assessment are adhered to (subject to BRE365 tests), the proposed educational development will be safe from flooding hazards, not impede the

path of flood water, and it will remain safe for its lifetime while not increasing flood risk elsewhere. Their recommendations are:-

- Finished ground floor levels should be set no lower than 37.66m AOD or 150mm above ground level, whichever is greater to mitigate the risk of fluvial flooding.
- Detailed surface water drainage strategy be developed.
- Surface water be managed by feasible SuDS. Should infiltration prove unfeasible, 1,888m³ storage should be provided and discharged at 5.1l/s.
- Occupants should sign up to receive flood warnings from the Environment Agency to give them advance notice of flooding that may affect the local area.

The development proposals within this report are considered to be compliant with national, regional and local planning policy, as well as the Non-Statutory Technical Standards for Sustainable Drainage Systems published by DEFRA and the Lead Local Flood Authority (LLFA) requirements

Flood Risk Assessment: This report confirms that the majority of the site is located within Flood Zone 1 (an area with low probability of flooding). A triangle of the land located along the western boundary of the site is located in Flood Zone 3a and this land is more vulnerable to flooding. A culverted section of the Chaffinch Brook watercourse is situated along the banked railway line which borders the western boundary to the site. The report discusses the potential risks of flooding at the site and confirms the drainage strategy.

The report notes that

- The buildings have been located in the part of the site with the lowest area of flood risk, namely Flood Risk 1
- Any fluvial risk to the building can be mitigated by setting finished floor levels no lower than 35.91AOD or 150mm above the existing ground level, whichever is the greater and this will protect against medium risk of groundwater flooding.
- Surface water run-off can be effectively managed through the incorporation of Sustainable Urban Drainage Systems into the final drainage design.
- The report concludes that, providing the recommendations in this assessment are adhered to, the proposed educational development will be safe from flooding hazards, not impede the path of flood water and it will remain safe while not increasing flood risk elsewhere.

Following objections from the Environment Agency, a revised FRA dated 8th November 2016 and an Exception Test report have been submitted which consider the range of flooding events including extreme events on people and property using the most up to date site specific modelled flood levels and takes account of climate change.

Air Quality Assessment: The report considers that potential impacts of existing and future traffic levels on the application site. The impact of vehicle

emissions will be tested using techniques in the Design Manual for Roads and Bridges and the Local Air Quality Management Technique Guidance and the ADMS-air dispersal model. The report does not assess the potential impact from any proposed heating system.

In terms of vehicle emissions, the predicted concentrations of PM10 and NO² are below the relevant objectives across the proposed development site and fall within the APEC Category A, which states that there are no air quality grounds for refusal, however, mitigation of any emissions should be considered.' Based on the predicted mean PM10 and NO² concentrations are unlikely to be exceeded and the impact on playground facilities will be acceptable in terms of the likely short term effect.

In terms of activity associated with construction activities, the impact of dust can be reduced to negligible through appropriate mitigation measures which are summarised in the report.

Energy and Sustainability Report: Energy efficiency measures have been implemented to provide carbon saving in comparison to the Target Emission Rate regulated emissions. The energy efficiency measures include: improved fabric insulation, improved air tightness, high efficiency ventilation systems, high efficiency heating and cooling, and low energy lighting with daylight dimming.

These standards require an improvement in Carbon Dioxide (CO²) emissions of the new building of 35% over Part L 2013 of Building Regulations and identification of the feasibility of a range of potentially suitable renewable energy technologies. Local Plan requires for a 20% reduction from renewable energy wherever feasible.

For renewable provision a Photo Voltaic system was identified as the most technically viable solution for the site to both provide renewable energy and meet the carbon reduction requirements of the London Plan. Initial calculations show a total site carbon reduction of 136.989 tonnes per year will be achieved from the energy efficient measures and PV panels and equates to an overall 35% reduction. Continued design work is required as the project evolves.

Noise Assessment: The report considers the noise climate on the site, taking into account the noise sources around the site on the proposed use and buildings. The report concludes that the climate is entirely suitable for use as a school. Suitable internal ambient noise levels will need to be provided to internal accommodation through appropriate design of the external building fabric.

The report recommends numerous measures to achieve the required noise levels including, acoustic glazing, façade and roof construction, locating sensitive receptor uses in the school away from the part of the building close to the railway, internal ventilation to sensitive rooms where open windows will result in too much noise intrusion, setting of suitable limits for plant noise

levels, acoustic barriers along the majority of the site boundary adjacent to residents and panelling around the MUGA to prevent potential noise from ball impacts.

External Lighting Assessment: This report considers the impact of proposed lighting spill and light pollution from safe levels of lighting that are needed to illuminate the site and from floodlighting proposed for the rugby pitch and MUGA. Following comments from the Council's Environmental Health Officer regarding the proposed floodlighting installations a revised report was received in November 2016.

The performance objective is to provide adequate illumination for safe access for building users to satisfy the local authority/planning requirements and Secure by Design. In addition it is proposed to provide floodlighting to the MUGA and rugby pitch to provide adequate illumination for their safe use for sport and satisfy the local authority/planning requirements.

The local area contains residential properties and the scheme needs to address this issue in respect to light spill and light pollution. The car parks and access roads will generally be illuminated by low level bollards and bulkhead luminaires which adopt LED and flat dichroic glass to maximise control of unwanted upward light spill and light spill to adjoining areas. Low level bollards have been introduced to achieve the desired low lighting levels to ramps and walkways. Luminaires shall be mounted over each entrance/exit doorway with emergency modules as required.

In addition it is proposed to install floodlighting to the MUGA and the rugby pitch. The outline strategy has been calculated using discharge light sources, due to a lack of technical and performance data for LED floodlighting luminaires from manufacturers. At detailed design the feasibility for installation of LED floodlighting will be investigated with a specialist contractor.

BREEAM Pre Assessment: This report assesses the proposals against the BREEAM criteria and concludes that the development would meet a minimum 'Very Good' standard based on the number of targets that are currently achieved and possibly an 'Excellent' standard for potential credits that may be achieved.

Statement of Community Involvement: The Statement advises that 2 public exhibitions were held in March and May 2016 as part of the pre-application process. Ward Councillors and residents and a total of 68 people recorded their attendance at the meeting in March and 60 people in May. The applicant also met with councillors, local residents, community groups and neighbouring schools and followed the Planning pre-application process.

Extended Phase 1 Habitat Survey, Bat Activity Report and additional Badger Inspection Report: The reports advise that the site is of medium ecology value and will have a minor impact upon the site. The reports are summarised below.

- A Phase 1 Habitat Survey has been undertaken which included a Protected Species Assessment
- The site is not within 2km of any statutory or non-statutory designated sites for nature conservation.
- There is no evidence of Badgers, Otters, Water Vole, Great Crested Newts, Reptiles or Hazel Dormouse being present within the study area.
- There are 9 desk based records of bats within 1 km of the site and the site is considered to be of moderate value for foraging and of negligible bat roost potential.
- The Phase 1 report recommends that a further dedicated bat survey is carried out. This has been completed and submitted.
- The Bat Activity Report concludes that the site is regularly used by moderate numbers and variety of bat species for foraging and as a commuter route, particularly along the western and southern boundary trees. The site is of moderate value to bats in the local area.
- To protect the bat habitat the report recommends retaining and replacing vegetated boundaries, limiting the impact of light pollution, including wildlife friendly planting in the landscaping scheme and provision of bat boxes.
- A fox earth was identified along the southern section of the boundary but on inspection it was found to have collapsed. A further specialist Badger Inspection report finds that there is limited foraging activity and paw prints and hairs were still present. A new series of holes have been found along the northern boundary but these are shallow and a short distance into the ground. At no time were any badger prints, hair, trackways or dung pits found within the site.
- Any vegetation removal or tree works should be carried out outside the bird nesting season to avoid impacting on nesting birds. If not nests with eggs should not be disturbed until birds have fledged. This will ensure that there is no major impact on breeding birds which may occupy any of these features.
- The Habitat Report advises that the impact of the development in terms of biodiversity can be offset by enhancement measures associated with landscaping and inclusion of bat and bird boxes and ecological areas on the site.
- Landscaping should include native trees and shrubs and use wild flower seed mix.

Tree Report: This report, which was carried out in February 2016, has identified all of the trees on the site and considers the impact of the development on the trees and measures required for tree protection. The key arboricultural features are

- The row of mature and semi mature lime trees along the west boundary
- The mature oak trees on the south boundary
- The mature and semi mature hornbeam trees on the east boundary

A total of 92 trees were surveyed with trunk diameters over 75mm.

- There are no Category A trees and no Category B trees assessed for removal

- Two Category C trees have been assessed as requiring removal and will be removed for the development. These trees are situated within the site on the boundary with the railway embankment
- Twenty two individual Category U trees are designated for removal as they are dead or should be removed for safety reasons.
- Three hedges are to be removed for the development.

The report concludes that the arboricultural impact of this scheme is negligible and will not constitute any long term threat to the character of landscape of the proposed school grounds. Tree Protection measures are recommended.

Location

The application site is located on the south-eastern side of Balmoral Avenue and comprises around 4.6ha of open land which was formerly used by the South Suburban Co-Operative Group as a sports ground with sports pitches. A bowling green was also laid out on the site. The site is adjoined by the Beckenham Rugby Club to the north east and the David Lloyd Leisure Centre to the east, both of which are also designated Urban Open Space. The site is immediately adjoined by residential development to the north-west and west in Balmoral Avenue, Mountbatten Gardens and Upper Elmers End Road. To the south is an elevated railway line with residential properties beyond in Lloyds Way.

Balmoral Avenue is mainly residential in character and the site lies at the western end of the road closest to Upper Elmers End Road.

Part of the western edge of the site falls within Flood Zones 2 and 3.

The site is designated Urban Open Space (UOS).

There is a woodland or group Tree Preservation Order (TPO) protected trees within the southern railway embankment that adjoins the southern boundary of the site.

The site is not within a conservation area or within any designated areas of interest for nature conservation and there are no statutory listed or locally listed buildings in the vicinity of the site.

The site is within an area rated as having a public transport accessibility level (PTAL) of 3 at the front gate (on a scale of 1 to 6 where 6 is the most accessible) and 1b adjacent to the main building.

Consultations

Comments from Local Residents

Nearby properties were notified and 127 representations objecting to the proposal, including representations from West Beckenham Residents

Association, and 39 representations in support have been received at the time of writing this report.

In addition, a petition with over 480 signatures has been submitted in support of the development. The comments received are summarised below.

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):

- Junction of Upper Elmers End Road, Elmers Green and Croydon Road is heavily congested at rush hour.
- Adverse impact on Eden Park Avenue/Croydon Road will affect both right and left turns as there is only 1 lane here.
- Significant loss of amenity and adverse impact on the character of the area from the additional traffic dropping of and picking up in Balmoral Avenue
- On street car parking demand from Marian Vian Primary School in Shirley Crescent already spills into Balmoral Avenue and causes chaos. Additional traffic from EPHS will push cars further away into surrounding streets which will impact more residents
- The capacity of buses to move children to and from the school is not enough – they are already overcrowded at school opening and closing times and crowds of tired children trying to get home could create an unpleasant atmosphere for residents.
- No. 367 bus is a single decker bus as Eden Park Avenue can only take single decker buses
- The TA relies too heavily on projected targets of reduced car use when calculating the number of vehicle movements in the area and parking demand on Balmoral Avenue
- The TA relies on parking spaces in Eden Park Avenue which cannot be used as the road is too narrow and parking would block traffic.
- School children on bikes use the pavement which is dangerous for pedestrians
- Number of parking spaces for staff is far too high – they should use public transport
- More children should walk to school
- Noise, pollution and light pollution from additional cars.
- Vehicle access to the site from Balmoral Avenue is unacceptable as the road is too narrow
- Width of Balmoral Avenue is incorrect on OS extract making it look wider than it is whereas it is narrower and not able to deal with extra traffic.
- Pupils walking along Upper Elmers End Road is dangerous as there will be a lot of them, the road is very busy so crossing will be dangerous and a lot of children on the pavements waiting for buses will be dangerous

- Anymore traffic on Balmoral Avenue will mean residents cannot get out of Osbourne Close where there is no alternative access.
- Additional traffic will lead to greater congestion and more accidents as people take risks to avoid queues
- Contractor can't regularly clean the road during construction so road will be messy and slippery.
- Traffic survey should have been carried out over several days to get a clear picture of existing traffic movements. Mode of transport data is 2011 and show of hands relates to a school with a smaller catchment area.
- Concern about reliability of some of the data in the TS especially relating to projected car generation as site will have a wide catchment area, number of existing parking spaces available in the area and walking distances for park and stride/walking pupils.
- Concern that school will try to open a new entrance to Stanhope Grove which will increase pupil and car numbers in this road.
- Maybe have a one way system and resident only parking to discourage parents using cars to drop off children
- Traffic congestion is severe when Beckenham Rugby Club have matches so a whole school worth of vehicles will cause chaos and gridlock.
- No allowance made for large numbers of parents visiting the school on parents evening or for school events.
- Right turn from site into Balmoral Avenue will add congestion at the junction of Balmoral Avenue and Upper Elmers End Road and cause severe congestion in Balmoral Avenue which is not wide enough for cars to pass each other when road has parked cars on each side.
- Junctions that are already overcapacity should have improvements made to them.
- No confidence that the Travel Plan will reduce car borne journeys

Specific concerns relating to traffic and highways raised in comments:

- Junction of Upper Elmers End Road, Elmers Green and Croydon Road is heavily congested at rush hour.
- Adverse impact on Eden Park Avenue/Croydon Road will affect both right and left turns as there is only 1 lane here.
- Significant loss of amenity and adverse impact on the character of the area from the additional traffic dropping of and picking up in Balmoral Avenue
- On street car parking demand from Marian Vian Primary School in Shirley Crescent already spills into Balmoral Avenue and causes chaos. Additional traffic from EPHS will push cars further away into surrounding streets which will impact more residents
- The capacity of buses to move children to and from the school is not enough – they are already overcrowded at school opening and closing times and crowds of tired children trying to get home could create an unpleasant atmosphere for residents.

- No. 367 bus is a single decker bus as Eden Park Avenue can only take single decker buses
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- The TA relies on parking spaces in Eden Park Avenue which cannot be used as the road is too narrow and parking would block traffic.
- School children on bikes use the pavement which is dangerous for pedestrians
- Number of parking spaces for staff is far too high – they should use public transport
- More children should walk to school
- Noise, pollution and light pollution from additional cars.
- Vehicle access to the site from Balmoral Avenue is unacceptable as the road is too narrow
- Width of Balmoral Avenue is incorrect on OS extract making it look wider than it is whereas it is narrower and not able to deal with extra traffic.
- Pupils walking along Upper Elmers End Road is dangerous as there will be a lot of them, the road is very busy so crossing will be dangerous and a lot of children on the pavements waiting for buses will be dangerous
- Anymore traffic on Balmoral Avenue will mean residents cannot get out of Osbourne Close where there is no alternative access.
- Additional traffic will lead to greater congestion and more accidents as people take risks to avoid queues
- Contractor can't regularly clean the road during construction so road will be messy and slippery.
- Traffic survey should have been carried out over several days to get a clear picture of existing traffic movements. Mode of transport data is 2011 and show of hands relates to a school with a smaller catchment area.
- Concern about reliability of some of the data in the TS especially relating to projected car generation as site will have a wide catchment area, number of existing parking spaces available in the area and walking distances for park and stride/walking pupils.
- Concern that school will try to open a new entrance to Stanhope Grove which will increase pupil and car numbers in this road.
- Maybe have a one way system and resident only parking to discourage parents using cars to drop off children
- Traffic congestion is severe when Beckenham Rugby Club have matches so a whole school worth of vehicles will cause chaos and gridlock.
- No allowance made for large numbers of parents visiting the school on parents evening or for school events.
- Right turn from site into Balmoral Avenue will add congestion at the junction of Balmoral Avenue and Upper Elmers End Road and cause severe congestion in Balmoral Avenue which is not wide enough for cars to pass each other when road has parked cars on each side.

- Junctions that are already overcapacity should have improvements made to them.
- No confidence that the Travel Plan will reduce car borne journeys

Support

- Growing need for school places in the area creating demand for this new school.
- The Council has identified the need for 4 additional schools to meet growing demand for school places
- New school offers greater choice in this area and will meet needs not met by other schools. Also there is a shortage of senior schools for boys in the area
- It will provide spaces for areas where there is a shortage of spaces, including Clock House and Kent House.
- Support the ethos of the Ravensbourne School, which is part of the E21 group
- Some disruption to residents is outweighed by increased house values resulting from the introduction to a good school in the area
- Highways problems will be limited to term time for a short time each day and the need for the new school outweighs this inconvenience.
- Makes good use of land that is no longer in its original use
- Site is well suited and accessible for education use
- Support for the temporary accommodation for Eden Park High School
- Support new school but want to see maximum amount of green space retained

Comments from Consultees

Highway Authority:

Initial comments from Highways were as follows:

“The application site is located adjacent to the Beckenham Rugby Football Club and it is designated as Urban Open Land. The site fronts onto Balmoral Avenue; an existing vehicle access and pedestrian access is provided for the site on to Balmoral Avenue. The site is bounded by Balmoral Avenue to the west, residential properties to the south east, railway line to the south, David Lloyd Gym to the East and Eden Sports Ground (Beckenham Rugby Club) to the north. The PTAL rating has been calculated from the school gate on Balmoral Avenue, returning a PTAL rating of 3, and from the entrance to the school building which has a PTAL rating of 1b.

Vehicular access is proposed from Balmoral Avenue with 103 parking spaces provided for staff and visitors together with facilities for drop-off / pick-up within the site adjacent to Balmoral Avenue. A small car park of 40 spaces with a coach drop-off / pick-up layby is proposed on the Balmoral Avenue frontage together to the front of the site with a larger car park of 63 spaces

(inclusive of 5 disabled bays) plus 4 spaces for mini buses situated to the rear of the site, adjacent to the school building. The main vehicular entrance will be adjacent to the northern boundary of the Balmoral Avenue site frontage with a further separate exit only egress from the car park on to Balmoral Avenue in the approximate centre of the site frontage. Pedestrian and cycle access is proposed from Balmoral Avenue to the school building which is located at the southern part of the site frontage. It is also intended to widen the footway along Balmoral Avenue site frontage. This is acceptable. However the applicant is required to carry out all the recommendations prescribed in the safety audit report.

On-Street Parking

The streets immediately surrounding the site have unrestricted on-street parking, with the exception of single / double yellow lines on Eden Park Avenue.

Traffic Surveys

Fully classified junction turning counts have been commissioned at the junctions of Balmoral Avenue / Upper Elmers End Road (A214) (Priority Junction), Balmoral Avenue / Eden Park Avenue (Priority Junction), Dunbar Avenue / Eden Park Avenue (Priority Junction) and Eden Park Avenue / A222 Croydon Road (Priority Junction) which were undertaken on Tuesday 15th March 2016 for weekday AM and PM periods between the hours of 0700-0930 and 1430-1830.

The highway network peak hours from these counts is considered to be 0745-0845 and 1600 – 1700. The two way vehicular traffic flow on the Balmoral Avenue to the north (at its junction with Eden Park Avenue) was 291 vehicles (two way) in the AM Peak and 183 vehicles in the PM Peak and to the south (at its junction with Upper Elmers End Road) 318 vehicles (two way) in the AM Peak and 196 vehicles in the PM Peak. The peak times for the school are considered to be fall within the periods 0745 to 0845 and 1700 to 1800. These are based on 30 mins each side of 0815 when pupils are recommended to be on site for registration at 0830 in the morning and 30 mins each side of 1730 when pupils finish the extended school day. At 1700 to 1800 the two way traffic flow on Balmoral Avenue to the north (at its junction with Eden Park Avenue) was 158 vehicles (two way) and to the south (at its junction with Upper Elmers End Road) 162 vehicles (two way).

On-Street Parking Survey

An on-street parking survey has been undertaken on Tuesday 15th March 2016 during the periods 0730 to 0930 and 1530 to 1830 with 30mins intervals and 0800- 0900 and 1700-1800 with 15mins intervals on Balmoral Avenue, and parts of Eden Park Avenue and Upper Elmers End Road.

Proposed Development

Existing Temporary School

Whilst the permanent site is being designed and constructed, it will be necessary for the School to be housed in temporary accommodation for a period of two years.

Proposals for a temporary school have been submitted for a period of two years at the Ravensbourne School Site and would accommodate 360 pupils. The existing Ravensbourne School is a secondary school with approximately 1400 pupils on site and 206 members of staff. The temporary school is planned to open in 2017.

The opening hours for the school are envisaged as follows:-
 Secondary school (operating hours) 0830 to 17.30
 Secondary school (opening hours) 0630 to 20.00 hours

Given the school hours the peak times of vehicular activity for the school are considered to be fall within the periods 0745 to 0845 and 1700 to 1800. These are based on 30 mins each side of 0815 when pupils are recommended to be on site for registration at 0830 in the morning and 30 mins each side of 1730 when pupils finish the extended school day.

The number of pupils would gradually increase to reach the full school roll and a phasing schedule is shown below:-

Year	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
	TEM P	TEM P	TEM P	Sch Ope ns						
Yr. 7	0	180	180	240	240	240	240	240	240	240
Yr 8			180	180	240	240	240	240	240	240
Yr 9				180	180	240	240	240	240	240
Yr 10					180	180	240	240	240	240
Yr 11							180	240	240	240
Yr 12							240	240	240	240
Yr 13								240	240	240
Total	0	180	360	600	840	1080	1380	1680	1680	1680

The surplus places in the 6th form year groups in 2022 – 24 would be offered externally as the 2 year groups who started in the temporary accommodation roll forward.

The number of staff would also gradually increase and a phasing schedule is shown below

Staff	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
SLT		1.5	1.7	2	3	4	7			
Teaching		8	15	26	36	47	52	57	57	57

<i>Pupil support</i>		7	12	16	19	21	21	21	21	21
<i>Admin</i>		4.1	6.1	10.1	13.4	15.5	15.5	15.5	15.5	15.5
<i>Premises</i>		1	1.5	2.3	2.8	4	4	4	4	4
<i>Catering</i>		2	2.5	2.5	3.9	44	4.4	4.4	4.4	44
<i>Other</i>		2	2	5	5	7	7	10	10	1
Total		26	41	64	83	103	111	120	120	120

No parking or arrangements for pupil pick-up and drop-off are envisaged on site with the exception for pupils with disabilities or other mobility impairment. There will be 105 parking spaces (inclusive of 6 disabled spaces) for staff and visitors plus 4 spaces for mini-buses served from the vehicular access to the school with an area for coach / pupil drop-off and pick-up off Balmoral Avenue.

Where Pupils Live, Pupils Postcode Data

A summary of the distance pupils might live from the proposed school is provided in the table below:-

Post Code	0 to 800m	800 to 1km	1k to 1.6km	1.6km to 2.0km	2.0km to 3.2km	3.2km to 4.8km	Over 4.8km	
BR	26	7	24	16	31	19	11	
SE	0	0	0	10	45	24	11	
CR	2	5	0	1	6	0	0	
Total	28	12	24	27	82	43	22	238
Percentage	11.8%	5.0%	10.1%	11.3%	34.5%	18.1%	9.2%	100%
Cumulative %	11.8%	16.8%	26.9%	38.2%	72.7%	90.8%	100%	

The overall proportion of pupils in the BR postcode is 56%, SE postcode is 38% and CR postcode is 6%. Reference to drawing 9201-001 shows the main focus of where pupils live, this being to the West and North West of the proposed school.

The overall proportion of pupils in the BR postcode is 56%, SE postcode is 38% and CR postcode is 6%. Reference to drawing 9201-001 shows the main focus of where pupils live, this being to the West and North West of the proposed school.

Existing School Travel Plans

Mode split data from school travel plans in Bromley and Croydon have been

obtained for the following three secondary schools:-
 Langley Park School - Girls school (Bromley)
 Langley Park School - Boys school (Bromley)
 Shirley High School (Croydon)

The average Pupil and Staff data is summarised below.

	Car	Car Share	Park & Stride	Rail	Tram	Bus	School Bus	Cycle	Scoot	Walk	Total
Langley Park School for Boys	216	23	58	64	43	383		18		843	1684
Shirley High School	127	0	0	0	91	518		5	0	237	978
Langley Park School for Girls	81	46	124	35	5	232	1	4	0	325	853
Total	520	92	215	138	139	1664	1	34	4	1554	4359
Proportion	12.2%	2%	5.2%	2.8%	4%	32.4%	0%	0.8%	0%	40.4%	100%

Based on the above average multi modal percentages, potential Multi Modal generations for the proposed 1,680 pupils is shown in the table below:

	Car	Car Share	Park & Stride	Rail	Tram	Bus	School Bus	Cycle	Scoot	Walk	Total
Proportion	12.2%	2%	5.2%	2.8%	4%	32.6%	0%	0.8%	0%	40.4%	100%
1680 Pupils	205	33	88	48	91	518	0	13	0	678	1680

As indicated from the table above 80.6% travel by non-car modes, which excludes car share and park and stride. Car sharing is 2% and park and stride is at 5.2% and car is 12.2%.

Staff Travel

	Car	Car Share	Park & Stride	Rail	Tram	Bus	School Bus	Cycle	Scoot	Walk	Total
Langley Park School for Boys	152	2	0	6	0	9	0	7	0	12	188
Shirley High School	119	4	0	0	0	10	0	3	0	9	145
Total	271	6	0	6	0	19	0	10	0	21	333
Proportion	81.4%	1.8%	0%	1.8%	0%	5.7%	0%	3.0%	0%	6.3%	100%

Based on the above average multi modal percentages, potential Multi Modal generations for the proposed 120 staff is shown in the tables below:

	Car	Car Share	Park & Stride	Rail	Tram	Bus	School Bus	Cycle	Scoot	Walk	Total
Proportion	81.4%	1.8%	0%	1.8%	0%	5.7%	0%	3%	0%	6.3%	100%
120 Staff	98	2	0	2	0	7	0	3	0	8	120

The table above indicates 16.8% travel by non-car modes, which excludes car share and park and stride. Car sharing is 1.8% and park and stride is at 0%.

2011 School Census Information

Mode split data for 5 schools in Bromley and Croydon has been obtained from the 2011 School Census website for the following secondary schools:-
Langley Park School - Boys and Girls school (Bromley)

The Hayes School (Bromley)
 Ravensbourne School
 Shirley High School
 Oasis Academy, Shirley Park (Croydon)

Based on the average multi modal percentages, potential Multi Modal generations for the proposed 1680 pupils is shown in the table below:

	Walk	Cycle	Car	Bus	Train	other	Total
<i>Proportion</i>	81.4%	1.8%	0%	1.8%	0%	3.0%	100%
<i>1680 Pupils</i>	760	20	191	610	39	60	1680

89% travel by non-car modes. On average 11% travel by car to the school based on the schools detailed above.

The Ravensbourne School Travel Surveys.

A pupil and staff 'Hands Up' travel survey has been undertaken in October 2015 of the pupils at The Ravensbourne school, a second pupil 'Hands Up' travel survey has been undertaken in March 2016.

Also pupil and staff 'Hands Up' travel survey was undertaken in October 2015 of the pupils at the Ravensbourne school. It should be noted that the school comprises of approximately 1400 pupils and 206 members of staff. The survey comprised of 100% respondents and the modal split and potential Multi Modal generation for the proposed 1680 pupils.

Pupil Hands up survey Oct 2015 indicates that 87% travel by non-car modes, which excludes car share and park and stride. Car sharing is 1% and park and stride is at 6%.

The staff survey reveals 14% travel by non-car modes, which excludes car share and park and stride. Car sharing is 4% and park and stride is at 39%.

March 2016 Survey (Ravensbourne Hands Up Survey)

A pupil 'Hands Up' travel survey has been undertaken in March 2016 of the pupils at the Ravensbourne school accommodation. The school comprises of approximately 1400 pupils. The survey comprised of 88% respondents and the modal split and potential Multi Modal generations using this data for the proposed 1680 pupils.

84% travel to school by non-car modes, which excludes car share and park and stride. Car sharing is 5% and park and stride is at 2%. 87% travel from school by non-car modes, which excludes car share and park and stride. Car sharing is 4% and park and stride is at 2%.

Pupil Traffic Generations

For assessment purposes this Transport Assessment has used information recorded in the Ravensbourne School Hands Up Survey (March 2016) to assess the likely level of vehicle trips to/from the proposed school. A summary of the proposed and likely levels of pupils travelling to school in a vehicle is indicated below:

Pupil Travel to/from School	Car
Travel Proportions To School	16%
Pupils traveling to School in a Car	269
Travel Proportions From School	13%
Pupils traveling From School in a Car	218

Up to 269 Pupils could travel to school in a car and up to 218 pupils could travel from the school in a car. It should be noted that no allowance is made in this table for siblings or friends travelling together in a vehicle or car sharing.

A summary of the split of pupils is identified below:

Mode of Travel to School	1680 Pupils	
	Mode Share (%)	Trip Generation
Car	9%	154
Car Share	5%	76
Park and Stride	2%	35

Pupil Hands up survey (Travel to School by Car)

Mode of Travel to School	1680 Pupils	
	Mode Share (%)	Trip Generation
Car	7%	118
Car Share	4%	75
Park and Stride	2%	26

Pupil Hands up survey (Travel From School by Car)

The level of car sharing has been identified as 5% (76 pupils) travelling to school and 4% (75 pupils) travelling from school. For assessment purposes it has been assumed that there are 2 pupils per vehicle for Car Sharing. On this basis there would be one vehicular trip per two pupils. It is considered that the pupils who are identified as park and stride would not travel by car along Balmoral Avenue and the closest to the site they would be dropped-off and picked-up is along either Uppers Elmers End Road or Eden Park Avenue. It is further assumed for this analysis that a pupil car trip produces an arrival and departure trip.

Up to 454 vehicles (two way) could be generated in the AM Peak and 364 vehicles (two way) could be generated in the PM Peak for pupils travelling to and from the site. Given the school hours the peak times of vehicular activity for the school are considered to be fall within the periods 0745 to 0845 and 1700 to 1800. These are based on 30 mins each side of 0815 when pupils are recommended to be on site for registration at 0830 in the morning and 30 mins each side of 1730 when pupils finish the extended school day.

Staff Traffic Generations

For assessment purposes this Transport Assessment has used information recorded in the Ravensbourne (October 2015) travel survey to assess the likely level of vehicle trips to the proposed school for Staff. A summary of the proposed and likely levels of staff travelling to school in a vehicle is indicated below.

School name	Car
October 2015 (Ravensbourne Survey)	86%
Vehicle Generations Staff Travel	103

Up to 103 staff could travel to and from school in a car. A summary of the AM and PM peak arrivals and departures are indicated below.

	Arrivals	Departures	Total
AM Peak	103	0	103
PM Peak	0	103	103

As indicated from the tables up to 103 vehicles (two-way) could be generated in the AM Peak and 103 vehicles (two-way) could be generated in the PM Peak for staff travelling to and from the site. It is considered that staff would arrive about 30 mins before pupils and leave about 30 mins after pupils and staff trips would not be in the same time periods as pupils.

Traffic Distribution

The table below shows the percentage traffic assignments from the site to the main highway routes in the area of the school site:

Direction	Route	Distribution %
North and North West	Balmoral Ave / Eden Park Avenue / A22 Croydon Road	39.7%
East	Balmoral Avenue / Eden Park Avenue (East Bound)	26.1%
South and South East	Balmoral Ave / Upper Elmers End Road (South Bound)	20.2%
West	Balmoral Avenue / Upper Elmers End Road (North Bound)	14.1%
		100%

For pupils getting dropped off at the school gates the report assumes vehicles would depart in the same direction of their arrival. Pupils who are identified as

park and stride in section 7 would not travel by car along Balmoral Avenue and the closest to the site they would be dropped-off and picked-up is along either Uppers Elmers End Road or Eden Park Avenue. The traffic assignment for park and stride pupils assumes that a vehicle dropping of the pupil would carry on their journey rather than returning to their origin.

Distribution of staff travel has been based on an equal split staff travelling to the North, South, East and West. The table below shows the percentage traffic assignments from the site to the main routes in the area of the site

<i>Direction</i>	<i>Route</i>	<i>Distribution %</i>
<i>North</i>	<i>Balmoral Ave / Eden Park Avenue / A22 Croydon Road</i>	<i>25%</i>
<i>East</i>	<i>Balmoral Avenue / Eden Park Avenue (East Bound)</i>	<i>25%</i>
<i>South</i>	<i>Balmoral Ave / Upper Elmers End Road (South Bound)</i>	<i>25%</i>
<i>West</i>	<i>Balmoral Avenue / Upper Elmers End Road (North Bound)</i>	<i>25%</i>
		<i>100%</i>

Traffic Modelling

Transport Feasibility Assessment four junctions have been analysed as part of the Transport Assessment. These junctions are listed below:-

*Balmoral Avenue / Upper Elmers End Road (A214) (Priority Junction)
 Balmoral Avenue / Eden Park Avenue (Priority Junction)
 Dunbar Avenue / Eden Park Avenue (Priority Junction)
 Eden Park Avenue / A222 Croydon Road (Priority Junction)*

The computer program, PICADY 5, has been used to model these four junctions in order to assess the capacity, queuing and delay experienced at the accesses.

The OD Tab method of inputting traffic flows has been used in this analysis.

Ratio of Flow to Capacity value (RFC) exceeding 0.850 suggests that an arm of a junction is operating within capacity however delays and queuing are likely to be experienced. An RFC value exceeding 1.000 suggests that an arm of a junction is operating beyond its theoretical capacity and significant queuing and delay will be experienced.

Balmoral Avenue / Upper Elmers End Road (A214)

The results indicate that there is no adverse queuing or capacity problems at the priority junction given that the ratio of flow to capacity (RFC) is below 0.85. therefore sufficient spare capacity is available within this junction

Balmoral Avenue / Eden Park Avenue

Similarly there is no adverse queuing or capacity problems at the priority junction given that the ratio of flow to capacity (RFC) is well below 0.85. Sufficient capacity is available within this junction.

Dunbar Avenue / Eden Park Avenue

Again there is no adverse queuing or capacity problems at the priority junction given that the ratio of flow to capacity (RFC) is well below 0.85. Sufficient spare capacity is available within this junction

Eden Park Avenue / A222 Croydon Road

Finally no adverse queuing or capacity problems in the PM Peak period given that the ratio of flow to capacity (RFC) is below 0.85. However in the AM peak Eden Park Avenue is shown to be operating over capacity 0.906 in the 2016 base scenario and an increased RFC of 1.111 in the 2016 Base plus development traffic scenario.

Given the results for the AM assessment period further capacity analysis has been undertaken using the direct method of inputting traffic flow data and excluding staff traffic movements as it is considered that they will arrive before pupils and then leave after them. The tables below show the 2016 base situation together with the 2016 base plus development

Time Period	Movement	2016 Base AM	
		RFC	Queue
07:45-08:00	B-C	0.638	1.66
	B-A	0.094	0.1
	C-AB	0.717	2.46
08:00-08:15	B-C	0.657	1.83
	B-A	0.052	0.06
	C-AB	0.734	2.76
08:15-08:30	B-C	0.902	5.97
	B-A	0.225	0.28
	C-AB	0.666	2.17
08:30-08:45	B-C	0.767	3.69
	B-A	0.143	0.17
	C-AB	0.470	0.91

Table above 2016 Base

Time Period	Movement	2016 Base + Dev AM	
		RFC	Queue
07:45-08:00	B-C	0.807	3.5
	B-A	0.097	0.11
	C-AB	0.739	2.75
08:00-08:15	B-C	0.831	4.29

	B-A	0.053	0.06
	C-AB	0.759	3.15
08:15-08:30	B-C	1.077	18.04
	B-A	0.231	0.29
	C-AB	0.687	2.43
08:30-08:45	B-C	0.942	17.95
	B-A	0.147	0.18
	C-AB	0.485	0.97

Table above 2016 Base plus Development (pupils)

From the above table for the 2016 base scenario, it can be seen that only one RFC value is greater than 0.85 at 0.902 with a predicted queue of 5.97veh on the left turn out of Eden Park Avenue which is not considered unreasonable in the network peak period. It can be seen that the RFC values on the other movements are predicted at below 0.85. When development traffic is added the Eden Park Avenue left turn RFC increases from 0.902 to 1.077 and from 0.767 to 0.942 in the 08:15-08:30 and 08:30-08:45 15 minute interval periods respectively with corresponding queues of 18.04 and 17.95. There is no predicted direct increase to the left turn out traffic flow from the development. Whilst the predicted queue lengths increase. In this situation there is an alternative route which is to leave Balmoral Avenue via Upper Elmers End Road and then join Croydon Road which would assist in dispersing traffic. This junction does have reserve operational capacity.

A sensitivity test was requested by this office to understand the effect of some staff arriving with pupils is considered. In the foregoing capacity assessment it was assumed that staff would arrive 30 min before pupils in the period up to 0745. For this sensitivity test it is assumed that half of the staff would arrive between 0745 and 0815 indicating that 26 staff turn left into Eden Park Avenue in the AM peak with no departures and no staff arrives in the PM peak but with 25 departures in the PM peak. For this model scenario it is assumed that 14 staff vehicles turn left into Eden Park Avenue in addition to the pupil traffic movements in the AM peak. The initial capacity assessment in the PM peak allowed for all staff leaving in the same time period as pupils and shows that the RFC ratios are below 0.85.

The school is intended to adopt target modal splits which reduces the number of pupils travelling to school by car from 16% (March 2016 data) used for assessment purposes to 6.1% (May 2016 data) travelling to school by car which relates to the AM peak period. Overall the number of car trips using Balmoral Road would reduce from 192 arrivals and departures to 71 arrivals and departures. The number of park and stride car trips would reduce from 35 arrivals and departures to 18 arrivals and departures. With regard to the Croydon Road and Eden Park Avenue junction this has been re-assessed using the target pupil car trips. The results of the PICADY model for the 2016 base plus development (pupils only) is shown in the table below.

Time Period	Movement	2016 Base + Target Dev AM	
		RFC	Queue

07:45-08:00	B-C	0.663	1.84
	B-A	0.226	0.28
	C-AB	0.725	2.56
08:00-08:15	B-C	0.686	2.06
	B-A	0.196	0.25
	C-AB	0.744	2.9
08:15-08:30	B-C	0.938	7.37
	B-A	0.352	0.52
	C-AB	0.687	2.26
08:30-08:45	B-C	0.796	4.50
	B-A	0.264	0.37
	C-AB	0.476	0.93

Table above Base plus Target Development (pupils)

From the above table for the 2016 base plus target development scenario, it can be seen that only one RFC value is greater than 0.85 at 0.938 with a predicted queue of 7.37 vehicles in the 08:15-08:30, 15 minute interval on the left turn out of Eden Park Avenue which is not considered unreasonable in the network peak period and also that under the observed traffic flows the RFC is 0.902 for the same time period with a queue of 5.97. It can be seen that the RFC values on the other movements are predicted at below 0.85 so are within the practical capacity.

Summary

Whilst the permanent site is being designed and constructed, it will be necessary for the school to be housed in temporary accommodation for a period of two years.

Proposals for a temporary school have been submitted to the Local Planning Authority (LBB) for a period of two years at the Ravensbourne School 10.4 Eden Park High School is a proposed secondary school, which will provide 1,680 places for pupils aged 11-18. This comprises an 8 form-entry (8FE) secondary school (1,200 pupils) and 480 place sixth form. The permanent site for the new School is, off Balmoral Avenue, Beckenham, which is planned to open in 2019.

Pupil 'Hands Up' travel surveys was undertaken of the pupils at the Ravensbourne school accommodation. It should be noted that school comprises of approximately 1,400 pupils. Separate surveys have been undertaken for pupils travelling to school and pupils returning from school. For assessment purposes the submitted Transport Assessment used information recorded in the Ravensbourne Hands Up Survey (March 2016) to assess the level of Multi Modal and vehicle trips to the proposed school. The results show 84% (1,411 Pupils) travel to school by non-car modes and 87% (1,462 Pupils) travel from school by non-car modes. A further Hands Up Survey (May 2016) has been used to assess the target level of Multi Modal and vehicle trips to the proposed school.

The Ravensbourne Survey (October 2015) has been used to assess the likely level of staff Multi Modal and vehicle trips to the proposed school. The results

show 14% (17 staff) travel to school by non-car modes and 86% (103 staff) travel from school by car.

Vehicular access is proposed from Balmoral Avenue with 103 parking spaces provided for staff and visitors together with facilities for drop-off / pick-up within the site adjacent to Balmoral Avenue.

The traffic generation assessment considered the level of secondary school vehicular trips. Based on the Ravensbourne School 'Hands Up' (March 2016) survey up to 454 vehicles (two way) could be generated in the AM Peak and 364 vehicles (two way) could be generated in the PM Peak for pupils travelling to and from the site. Based on the Ravensbourne school October 2015 survey up to 103 (two way) car trips could be generated in the AM Peak and 103 trips (two way) could be generated in the PM Peak for staff travelling to and from the site.

The capacity assessments showed that the priority junctions of Balmoral Avenue/ Upper Elmers End Road (A214), Balmoral Avenue / Eden Park Avenue and Dunbar Avenue / Eden Park Avenue will operate within capacity for all modelled scenarios.

However, the junction of Eden Park Avenue / A222 Croydon Road is predicted to operate over capacity (0.906 RFC) on the Eden Park Avenue arm in the 2016 base traffic situation for the AM modelled period although it operates satisfactorily below 0.85 RFC in the PM period. When development traffic is added to the 2016 base scenario the RFC increases to 1.111. Further operational analysis of the junction operation shows that this would be a worst case and using the direct method of traffic flow data input the RFC is predicted to be 1.077 with a corresponding queue of 18 rather than 35.

As mentioned previously the school is intended to adopt target modal splits which reduces the number of pupils travelling to school by car from 16% (March 2016 data) used for assessment purposes to 6.1% (May 2016 data) travelling to school by car which relates to the AM peak period. In this situation the overall the number of car trips using Balmoral Road would reduce from 192 arrivals and departures to 71 arrivals and departures. The number of park and stride car trips would reduce from 35 arrivals and departures to 18 arrivals and departures in the AM peak.

With regard to the Croydon Road and Eden Park Avenue junction this has been re-assessed using the target pupil car trips. From this analysis, using the direct method of input and the 2016 base plus target development traffic flow scenario, it can be seen that only one RFC value is greater than 0.85 at 0.938 with a predicted queue of 7.37veh in the 08:15-08:30, 15 minute time interval. In comparison the RFC without development is 0.902 with a queue of 5.97veh. It should be noted that the number of pupils will increase gradually from 600 in 2019 when the school is predicted to open to 1680 in 2023. The School therefore has time to implement the Travel Plan and proposed measures to encourage travel by sustainable modes. In this case there is predicted to be no direct increase to the left turn out traffic flow from the development. In this situation there is an alternative route which is to leave

Balmoral Avenue via Upper Elmers End Road and then join Croydon Road which would assist in dispersing traffic. This junction shown to have reserve operational capacity.

The application will have an impact on surrounding road network and on the parking demand within the vicinity of the school site. It is however likely there will be some impact as the primary cause of congestion is parents wanting to drive as close as possible to the school entrance (during the morning drop off) some may double park and create congestion, regardless of available parking within walking distance of the school.

In terms of planning obligations, the school will need to commit to fund (£20,000) a future traffic management scheme should the Council wish to do so, supported by ongoing monitoring of parking capacity issue beyond 2020/21. Also any works in order to modify the existing Traffic Regulation Order or introduce a new (waiting restrictions) within the vicinity must be funded by the applicant.

If minded to approve, please include the following with any permission:

CONDITION

H01 (Access- all the safety audit recommendations must be adhered to)

H03 (Car Parking)

H16 (Hardstanding for wash-down facilities)

H22 (Cycle parking)

H28 (Car park Management)

H29 (Construction Management Plan)

H30 (Travel Plan)

H32 (Highway Drainage)

INFORMATIVE

DI16 (Crossover)

Non-standard informative – Street furniture/ Statutory Undertaker's apparatus "Any repositioning, alteration and/ or adjustment to street furniture or Statutory Undertaker's apparatus, considered necessary and practical to help with the forming/ modification of vehicular crossover hereby permitted, shall be undertaken at the cost of the applicant"

Further submissions from the applicant to address concerns raised by Transport for London (TfL) have been received and the Highways Officer provides further comments as follows:

"Impact on the Strategic Road Network

The applicant has redesigned the access creating one-way entry and exit system with the exit on to Balmoral Avenue laid out so that vehicles should turn left on to Balmoral Avenue. Because of the one-way circulation, the exit must be suitable for larger vehicles; this is acceptable as it reduces the conflict at the access points.

*Additionally a Car Park Management Plan (CPMP) was requested
The CPMP is envisaged to outline the following:*

- *Operating times of the school and facilities available for community use.*
- *Management arrangements at the beginning and end of the school day for pupil drop-off and pick-up. The layout envisages a barrier to control access to the rear car park during the school day.*
- *Management arrangements at the beginning and end of the school day for staff parking.*
- *Management arrangements at the end of the school day on weekdays and at weekends for the community use of school facilities.*

Cycle Parking

A further 17 short-stay cycle parking spaces be provided in addition to the 225 long stay spaces, which is satisfactory.

Travel Plan

The School Travel Plan working towards STARS accreditation and requested the introduction of target dates to achieve bronze (by the of the first academic year) and silver accreditation (two years after that).

Strategic Issues

With regard to pupil travel by car it should be noted that pupils would need to attend a school, even if Eden Park High School was not available and therefore it could be argued that in a broad sense travel by car would occur on the wider network to access these schools.

The Council's policy on off-street parking in development is set out in Policy T3 of the Unitary Development Plan. Appendix II – Parking Standards provides the maximum level of parking that could be provided in development for various types of use. No particular ratio is stated for class D1 Schools / Further Education, indicating that the level of parking should be assessed through the Transport Assessment.

In this case a parking survey has been undertaken and there are no restrictions to parking on Balmoral Avenue. However, Balmoral Avenue is a residential street with many properties having off-street parking. Parking outside schools is an emotive subject for residents and can lead to inconvenience, complaints and safety concerns. For this reason, parking for staff is provided on site as well some provision for pupil drop-off and pick-up.

The School proposals are supported by a School Travel Plan and targets have been set which are considered realistic by TfL. Nevertheless, some pupils will travel by car and therefore some provision is proposed at the beginning and end of the school day, in an effort to mitigate the potential concerns of residents living local to the school. It is considered that reducing the proposed level of parking would lead to increased concern from residents. With regard to the operational capacity concerns of the Croydon Road junction, reducing car parking for staff would not assist, since there are no staff departures in the AM peak period.

Furthermore, pupils starting year seven would have been attending primary school and would transfer to a secondary school, such as Eden Park High School and in this situation, those pupils travelling by car would again already be on the highway network. Those pupils leaving school after 6th form would no longer have the school as a travel destination.

The target modal splits are indicated in section 6 of the Transport Assessment which reduces the number of pupils travelling to school by car from 16% (March 2016 data) to 6.1% (May 2016 data) in the AM peak period. Overall the number of car trips using Balmoral Avenue would reduce from 192 arrivals and departures, to 71 arrivals and departures. The number of park and stride car trips would reduce from 35 arrivals and departures to 18 arrivals and departures.

With regard to the Croydon Road and Eden Park Avenue junction this has been re-assessed using the target pupil car trips. The results of the PICADY model for the 2016 base plus development (pupils only) is shown that only one RFC value is greater than 0.85 at 0.938 with a predicted queue of 7.37 vehicles in the 08:15-08:30 interval on the left turn out of Eden Park Avenue which is not considered unreasonable in the network peak period. Also for comparison under the observed base traffic flows the RFC is 0.902 for the same time period with a queue of 5.97. It can be seen that the RFC values on the other movements are predicted at below 0.85 so are within the practical capacity of the junction. In this situation queuing and delay at the junction occurs to the traffic on the side street and not on Croydon Road which is the priority route at the junction.

Furthermore the revised exit arrangement reduces predicted pupil car departure trips to the north by 47 of which 28 turned right towards Croydon Road in the AM peak period. In this time period, there are no departing staff trips so reducing staff car parking would not have any effect. The car trips categorised as park and stride would be unaffected since they do not travel along Balmoral Avenue.

The operational capacity of the Croydon Road junction has been tested under this scenario for the 2016 base plus target development scenario with a left turn exit, it can be seen that only one RFC value is greater than 0.85 at 0.911 with a predicted queue of 6.29 vehicles in the 08:15-08:30 time interval on the left turn out of Eden Park Avenue. This is not considered unreasonable in the network peak period. The RFC values on the other movements are predicted at below 0.85.

For comparison under the observed base traffic flows the RFC is 0.902 for the 08:15-08:30 time interval with a queue of 5.97 together with a RFC of 0.938 and queue of 7.37 if traffic can turn right out. Therefore, there is some benefit in providing an exit arrangement where traffic turns left out.

The operational capacity of the Balmoral Avenue / Upper Elmers End Road (A214) junction has been tested given the additional departing traffic and the results are summarised in the table below with a copy of the output attached: -

	AM Peak 07:45–08:45		Inter Peak 17:00–18:00	
	Max RFC	Max Queue	Max RFC	Max Queue
B-C	0.290	0.41	0.353	0.54
B-A	0.215	0.27	0.326	0.48
C-A	0.662	3.12	0.199	0.47

From the above table, it can be seen that there are no adverse queuing or capacity problems at the priority junction given that the ratio of flow to capacity (RFC) is below 0.85. Spare capacity is available within this junction under this traffic scenario.

The Highways Officer has confirmed that the proposed changes to the exit access to provide left turn only from the site into Balmoral Avenue has overcome concerns relating to the impact on the capacity at the junction of Eden Park Avenue and Croydon Road.

In addition the Highways Officer advises that the impact of the proposed community use of the MUGA and sports hall is acceptable in terms of the impact on the highway network and can be accommodated on the site and on local streets.

Transport for London (TfL)

The initial comments from TfL are as follows:

Impact on Buses

TfL has considered the additional information provided by the applicant with respect to the proposed schools catchment area and confirms that the additional trips envisaged as a result of the proposed development can be accommodated on the network.

Notwithstanding this, the school should encourage active travel including trips made to/from public transport. For example, pupils should be encouraged to walk to alternative bus stops offering a greater choice of bus services to help to spread the demand. TfL requests that the school reconsider any options to stagger the arrival and departure times of pupils to aid the dispersal of demand for bus travel.

Impact on the Strategic Road Network

Given the expected number of vehicle trips and the likely distribution of traffic on the network TfL considers the impact of the proposed development on the Strategic Road Network (SRN) to be unacceptable in line with London Plan policy 6.3. The junction between Eden Park Road and the A222 Croydon Road is likely to operate over capacity in all development scenarios.

In the Stage 1 report TfL requested that the number of staff parking spaces and the availability of pupil drop-off/pick-up on site should be significantly reduced, as this would encourage car travel. TfL strongly advises the applicant to consider this approach to discourage car travel in favour of sustainable travel modes and to reduce the impact of traffic on the SRN.

To alleviate the impact of the proposed development on the junction between Eden Park Avenue and Croydon Road, the applicant should consider the implementation of a one-way entry and exit system with a right-turn ban on the exit on to Balmoral Avenue. This would have the effect of preventing vehicles from routing north bound on Balmoral Avenue from the site to disperse the traffic on the wider network, via Balmoral Avenue and Upper Elmers End Road which is less congested. The junction geometry should be designed as such to physically deter right-turn manoeuvres from the site. This should be accompanied by swept path analysis to consider the movement of all vehicles including larger vehicles (such as coaches and refuse). The proposed junction would need to be agreed with Bromley Council and delivered through a section 278 (s278) agreement.

A Car Park Management Plan (CPMP) should be prepared to set out the proposed management of pupil drop-off/pick-up. The CPMP should set out the proposed one-way routing arrangements through the site and the school should implement mechanisms to monitor appropriate use of this facility. This should be secured by a condition.

Cycle Parking

The school is proposed to accommodate a total of 1,680 pupils supported by around 120 staff. The proposals provide a total of 225 cycle parking spaces which does not comply with London Plan standards. The current London Plan standards require a minimum of 1 space per 8 staff plus 1 space per 8 students for long-stay cycle parking spaces, plus 1 space per 100 students to provide short-stay cycle parking spaces. Therefore a total of 225 long-stay plus 17 short-stay cycle parking spaces should be provided as a minimum.

Travel Plan

TfL welcomes the commitment to support a school travel plan with the school to work towards achieving a STARS accreditation. The school should stipulate within the Travel Plan the target date for when the bronze accreditation will be achieved by. Typically the school should aim for at least bronze accreditation by the end of their first academic year, followed by a silver accreditation two years prior to that.

It is understood that the proposed school is allied with the Ravensbourne School which has a gold STARS accreditation. It is proposed that the Head teacher of the temporary school site which is located at the Ravensbourne School will act as the interim Travel Plan Coordinator; however this role will need to be covered by a member of staff at the proposed school to enable implementation of the travel plan going forward.

The school should be aware that as part of the STARS programme they will be required to complete a pupil hands up travel survey on an annual basis which can be recorded through the STARS system. TfL confirms that the travel plan targets are realistic and should be reviewed once the school is in operation.”

Following submissions by the applicant to overcome TfL concerns a further comment from TfL has been received as follows:

“Subsequent to the additional information submitted by the applicant on 22nd December 2016 (by email), including the Transport Addendum (9201/DJC/004) and revised Masterplan, TfL confirms that the proposals address previous concerns that were raised within the Stage 1 report and letter dated 9th December 2016. TfL provides the following comments:

- TfL welcomes the consideration of staggered arrival and departure times, the provision of Electric Vehicle Charging Points (EVCPs) and the additional 17 cycle parking spaces which is compliant with the London Plan standards.*
- It was strongly advised by TfL that the applicant should reduce the number of parking spaces proposed and it is disappointing that this has not been considered. The demand and use of the parking should be monitored via a robust Car Park Management Plan (CPMP). The submission of the CPMP should be secured by condition.*
- As requested, the proposed access arrangements have been amended to provide a one-way route, with left-turn only restriction on the egress to Balmoral Avenue, to alleviate the impact on the junction between Eden Park Avenue and Croydon Road. This will be subject to a detailed design process, including a Road Safety Audit, to be approved by the Council and should include adequate signage to enforce the banned right-turn manoeuvres.*
- TfL support the Travel Plan objectives and commitment of the school to work towards targets to achieve STARS accreditation. The Travel Plan targets must be monitored appropriately and stringent measures implemented to encourage the use of non-car transport modes, specifically increasing the level of active travel amongst pupils and staff.*

Subject to the above conditions being met, the proposed development as it stands would have no significant detrimental impact on the Strategic Road Network (SRN).

TfL has confirmed that the proposed changes to provide a left turn only from the site into Balmoral Avenue has overcome concerns relating to the impact on the capacity at the junction of Eden Park Avenue and Croydon Road.”

Greater London Authority (GLA)

The Greater London Authority (GLA) is a statutory consultee for this application. A Stage 1 letter was received from the GLA which provided detailed comments and the conclusion raised the following concerns:

“London Plan policies on principle of land use: provision of school on open space/ playing fields, community use, urban design, inclusive access, sustainable development/energy and flood risk management and transport are the key strategic issues relevant to this planning application. On balance, the

application does not comply with the London Plan. The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- *Land use - educational facilities on open space/playing fields: Robust justification on educational need, and an alternative site search, including co-location options, is required in order to justify development on existing designated open space and playing fields. This should also address the concerns expressed previously to the Council regarding its proposed site designation.*
- *Playing fields and community use: A community use plan, which makes available the new sport facilities in the school for community use outside the school's core hours, should be secured. As the site is a designated open space/playing field, results of negotiations with Sport England should be shared with the GLA.*
- *Urban design: The Council should secure key details of the cladding system and materials to ensure the best possible build quality is delivered and ease of maintenance is prioritised.*
- *Access: To ensure the application accords with London Plan Policy 7.2, the Council should secure a full access strategy with condition for the detailed design phase.*
- *Sustainable development - energy and flood risk management: the carbon dioxide emission savings exceed the target set within Policy 5.2 of the London Plan. However, the concerns in regard to heating and cooling strategy, provision of the BRUKL sheets including efficiency measures alone to support the savings claimed, future proofing and a single heating system, the total PV output in kWp, roof plan and the assumed efficiency of the panels should be clarified and addressed before compliance with London Plan energy policies can be verified. The Council should also secure the submission of a detailed sustainable drainage strategy meeting the requirements of London Plan policy 5:13.*
- *Transport: A significant reduction in staff car parking and a reduction in the availability for on-site pupil drop-off are required to discourage car use and relieve the traffic issues on the strategic highway network. Issues in regard to bus capacity and school travel plan also need to be resolved in discussion with TfL in order to meet London Plan transport policies.”*

The issues raised by the GLA will be addressed in the Conclusion section of this report. Should members be minded to grant permission for the application, the case will be referred back to the GLA for Stage 2 for further consideration.

Drainage

The Council's Drainage Officer states the following:

“Reviewing the submitted “Initial Surface Water Drainage Strategy Report” with reference number. FS0391-MAC-XX-XX-SP-P-003 Dated 05/12/2016, Microdrainage calculations dated 30/11/2016 and “Underground Drainage Layout” Plan DRW No. MAC-XXXX-DR-P-003 Dated 15/06/2016, I note the applicant is proposing to incorporate green roofs, permeable paving and a total attenuation tank of 1888m³ to restrict run-off rate discharge to 5.1l/s for all events including the 1 in 100 plus 30% are acceptable.

Condition: The development permitted by this planning permission shall not commence until a surface water drainage scheme for the site based on sustainable drainage principles, and an assessment of the hydrological and hydro geological context of the development has been submitted to, and approved by, the Local Planning Authority. The surface water drainage strategy should seek to implement a SUDS hierarchy that achieves reductions in surface water run-off rates to Greenfield rates in line with the Preferred Standard of the Mayor's London Plan.

Reason: To reduce the impact of flooding both to and from the proposed development and third parties.”

Environment Agency

Initially the Environment Agency (EA) raised the following objection to the development for the following reasons:

“The FRA submitted with this application does not comply with the requirements set out in paragraph 9 of the Technical Guide to the National Planning Policy Framework. The submitted FRA does not, therefore, provide a suitable basis assessment to be made of the flood risks arising from the proposed development. In particular, the submitted FRA fails to:

- Consider the range of flooding events including extreme events on people and property, using the most up-to-date site specific modelled flood levels.*
- Take the impacts of climate change into account.*

The majority of the site is situated within Flood Zone 1, with part of the site situated within Flood Zone 2 and 3. Under the National Planning Policy Framework (NPPF) the site is classified as ‘more vulnerable’ and would be considered acceptable under certain conditions.”

In order to address the concerns raised by the EA, the applicant has submitted a revised FRA for consideration. The EA now advise that the proposed development will only meet the requirements of the National Planning Policy Framework if the following measures as detailed in the Flood Risk Assessment submitted with this application are implemented and secured by way of a planning condition on any planning permission and recommend the following condition, together with further other advice:

“The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk Assessment (FRA) titled ‘Eden Park Secondary School, Balmoral Avenue,

Beckenham, Flood Risk Assessment, Version 2.0' dated 8 November 2016 and the following mitigation measures detailed within the FRA: Finished floor levels will be set no lower than 37.66mAOD or 150mm above the existing ground level, whichever is greater.

Reason: Finished floor levels situated 300mm above the 1 in 1000 year (0.1% AEP) flood level will reduce the risk of flooding to the proposed development and future occupants.

The worst-case scenario flood levels of 37.36m AOD for the 0.1% AEP have been used instead of 1% AEP plus climate change. The new allowances of climate change have been considered and the applicant has used the 0.1% AEP as the worst-case scenario. We have compared these flood levels with provisional model levels for the 1% AEP plus climate change with a 35% increase in flows and these are similar. We therefore deem the use of the 0.1% AEP flood levels to be acceptable at this site. The applicant has therefore proposed finished floor levels to be 300mm above the 0.1% AEP flood level at 37.66m AOD.

Other advice: We would recommend flood resilient measures to be incorporated within the development to minimise the impact of flooding to the development. We fully support the inclusion of flood resilience techniques. Information on flood resilience can be found on the following link http://www.planningportal.gov.uk/uploads/br/flood_performance.pdf.

We would also recommend that occupants register with the Environment Agency's flood warning service, 'FloodLine', so that they may prepare themselves in case of a flood event. This can be done by calling 0345 988 1188 to register.

We are pleased that the FRA considers safe dry access and egress. Please be aware that the Environment Agency does not normally comment on or approve the adequacy of flood emergency response procedures, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network. Any evacuation plan should provide suitable access and egress from the site and would need to be approved by the Local Planning Authorities (LPA's) Emergency Planning Department (EPD).

Please note that as a result of the Flood and Water Management Act 2010, the responsibility for surface water runoff, groundwater and ordinary watercourses now sits with the Lead Local Flood Authority (LLFA), London Borough of Bromley."

Thames Water

TW advise that with regard to sewerage infrastructure capacity, they would not have any objection to the above planning application.

“There will be approximately 3l/s additional foul flow into the receiving FW sewer network, the downstream sewers have capacity. Also, as this development is a school it will not discharge during the peak diurnal flows.

The proposed 5l/s peak surface water run-off equates to 2l/s/ha this is less than the current calculated SW run-off. Also, the FRA states that infiltration techniques will be investigated so there might not be any SW drainage connected to the local SW network depending on the results.

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.

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

We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Should the local planning authority be minded to approve the application Thames Water would like the following informative attached to the planning permission: A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer.

Thames Water recommend the following informative: Thames Water aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9litres/minute at the point where it leaves Thames Water pipes. The developer shall take account of this minimum pressure aim the design of the proposed development.”

Environmental Health

“Contamination: A condition requiring the submission of a contaminated land assessment and associated remedial strategy is recommended.

Air Quality: I note the air quality assessment does not include for any potential impact from any proposed heating system. The matter could be dealt with by condition.

Construction activities will involve vehicles movements within the AQMA. To ensure that construction works do not have an adverse impact on the transport network in accordance with London Plan I would normally recommend a condition requiring the submission of a Construction Logistics Plan.

I note the air quality report predicts the impact from vehicle emissions fall within APEC Category A and therefore have no substantial objections in respect of air quality. However I would seek mitigation as appropriate and a Dust Management plan for any demolition works.”

Noise: The EHO concurs with all of the findings of the Report prepared by Cole Jarman Associates (Report 15/0467/R2 June 2016) in terms of the Noise Impact Assessment. The Report makes a number of recommendations particularly concerning acoustic barriers to the boundaries and these should be implemented in full through the imposition of relevant conditions. The following condition is recommended:

The Recommendations of the Cole Jarman report (Report 15/0467/R2 June 2016) regarding acoustic barriers shall be implemented in full prior to the use commencing and permanently maintained thereafter.”

Reason: “In the interest of protecting neighbouring residential amenity in line with Policy BE1 of the Unitary Development Plan.”

Lighting: With regard to the Lighting Assessment, the proposed low level bollard and bulkhead lights to illuminate the car parks and other areas are considered acceptable. With regard to floodlighting for the proposed MUGA and rugby pitch, it appears that the levels given in this report are no more than a guide and are levels which satisfy the various standards but are not derived from light distribution figures relevant to each luminaire. I would therefore recommend that a Condition be imposed requiring that a lighting scheme be approved by the LPA.”

Ecology:

The Council has appointed a specialist ecologist to assess the Extended Phase 1 Habitat Survey, a Bat Activity Survey and a second inspection of the site for badgers.

On the Habitat Survey concerns were initially raised about the credentials of the report authors, the ecological definition of grassland, the lack of bat surveys in 2016, the apparent lack of reptiles on the site, the need for a further walkover to check for badgers and nesting birds.

The applicant responded to the concerns satisfactorily, including advising that the site strip had already commenced before they were able to do their site survey visit, and the Council appointed ecologist raises no objections to the proposal on ecological grounds. A condition to offset the impact on biodiversity with associated landscaping to encourage biodiversity an

inclusion of bat and bird boxes within the design development is recommended.

Metropolitan Police Crime Prevention Design Adviser:

The Met Police CPDA advises that he believes that this development, should it proceed should be built to achieve security specifications required with the guidance of Secured by Design (New Schools 2014), and the adoption of these standards will help to reduce the opportunity for crime, creating a safer, more secure and sustainable environment.

Employing the standards and principles of Secured by Design will provide a sensible and practical level of security, which will not adversely affect the efficient running of the school, is essential to the successful teaching and learning environment.

The majority of criminal incidents in schools relate to property crime. This is because modern schools contain a vast array of portable and desirable goods with a ready market, such as personal computers, laptops, digital projectors and other valuable equipment.

Other crimes that occur, particularly in our larger cities, are acts of vandalism, such as graffiti, arson and assaults. Assaults range from staff being physically assaulted by parents and students, to bullying by one or more students against another. In more recent times 'cyber' bullying has become a noticeable problem in schools, although there are now software solutions that are proving to be most effective. The victims of school crime can also extend beyond the staff and students as many schools open into the evenings and at weekends for use by the local community for activities such as adult education, sport and social events.

Sport England

"It is understood that the site forms part of, or constitutes land last used as playing field as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595).

However, as the playing field has not been used for at least five years, the consultation with Sport England is not a statutory requirement.

Notwithstanding the non-statutory nature of the consultation, Sport England has considered the application in the light of the National Planning Policy Framework (particularly Para 74) and Sport England's policy on planning applications affecting playing fields 'A Sporting Future for the Playing Fields of England' (see link below): www.sportengland.org/playingfieldspolicy

Sport England is content to remove its objection as it is considered the proposed development broadly meets exception 5 of the above policy. The absence of an objection is subject to the following condition(s) being attached

to the decision notice should the local planning authority be minded to approve the application:

- *No development shall 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 outdoor sports pitches; MUGA and sports hall and include details of pricing policy, hours of use, access by non-educational establishment users, management responsibilities and a mechanism for review. 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/facilities, to ensure sufficient benefit to the development of sport and to accord with Development Plan Policy.

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

- *No development shall commence until the following documents have been submitted to and approved in writing by the Local Planning Authority after consultation with Sport England:*
 - (i) A detailed assessment of ground conditions (including drainage and topography) of the land proposed for the playing field which identifies constraints which could affect playing field quality; and*
 - (ii) Based on the results of the assessment to be carried out pursuant to (i) above, a detailed scheme which ensures that the playing field will be provided to an acceptable quality. The scheme shall include a written specification of soils structure, proposed drainage, cultivation and other operations associated with grass and sports turf establishment and a programme of implementation.*

(b) The approved scheme shall be carried out in full and in accordance with a timeframe agreed with the Local Planning Authority after consultation with Sport England. The land shall thereafter be maintained in accordance with the scheme and made available for playing field use in accordance with the scheme.

Reason: To ensure that the playing field is prepared to an adequate standard and is fit for purpose and to accord with Development Plan Policy.

- *The Sports Hall and MUGA hereby permitted shall not be constructed other than substantially in accordance with Sport England's Technical Design Guidance Notes: Artificial Surfaces for Outdoor Sport (Updated guidance for 2013) and Developing the Right Sports Hall*

Reason: To ensure the development is fit for purpose and sustainable and to accord with Development Plan Policy.

- *Informative: The applicant is advised that the scheme should comply with the relevant industry Technical Guidance, including guidance published by Sport England, National Governing Bodies for Sport. Particular attention is drawn to 'Natural Turf for Sport', (Sport England, 2011).*

Should conditions recommended above not be imposed on any planning consent, Sport England would consider the proposal to not meet exception 5 of our playing fields policy, and we would therefore object to this application."

Network Rail

"The developer/applicant must ensure that their proposal, both during construction and after completion of works on site, does not:

- *encroach onto Network Rail land*
- *affect the safety, operation or integrity of the company's railway and its infrastructure*
- *undermine its support zone*
- *damage the company's infrastructure*
- *place additional load on cuttings*
- *adversely affect any railway land or structure*
- *over-sail or encroach upon the air-space of any Network Rail land*
- *cause to obstruct or interfere with any works or proposed works or Network Rail development both now and in the future*

The developer should comply with the following comments and requirements for the safe operation of the railway and the protection of Network Rail's adjoining land. As this proposal is a school, our main concern is to prevent trespass onto the railway. As such please note suitable fencing should be erected and discussed with Network Rail prior to any works commencing.

Additional advice is offered to the developer in terms of meeting Network Rail requirements in terms of future maintenance, drainage, plant and materials, scaffolding, piling, fencing, lighting, noise and vibration and landscaping which have been passed the applicant."

Trees and Landscaping

The Council's Tree Officer advises that "the arboricultural submissions have addressed the tree constraints associated with the proposed development and indicate protection measures for the duration of the scheme. Protection measures as illustrated on the Tree Protection Plan (TPP) are considered adequate for the needs of the site.

I can confirm that it is only the trees situated on the railway embankment that are protected under area Tree Preservation Order (TPO) 1273. This protects trees that are older than 20 years.

The proposed tree removals as listed within section 11 of the Tree Survey report are considered justified and acceptable. The removal of hedges H93-95

is equally acceptable as trees forming these hedges are of limited significance and were planted to conceal the bowls green. The retention of H96 is acknowledged and this is beneficial for screening purposes with regard to the neighbouring site in Mountbatten Close.

Conditions requiring compliance with the submitted Tree Survey and Tree Protection Plan and details of a landscaping scheme are recommended.”

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 Policy 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
G8 Urban Open Space
L6 Playing Fields
C1 Community Facilities
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
7.18 Protecting Open Space and Addressing Deficiency
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
Paras 215: consistency of local plans with NPPF

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 final consultation for the emerging Local Plan was completed on December 31st 2016. It is expected that 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 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

The site has been the subject of numerous previous relevant applications as follows:

92/02130/OUTMAJ and associated details: Detached Two Storey Block Comprising 20 Two Bedroom Flats With 40 Car Parking Spaces And Formation Of Car Park For Bowling Green Comprising 15 Spaces With Separate Access. Outline. Approved on appeal January 1994

DC/16/02014/EIA: Screening Opinion – No EIA required. 27th May 2016

The following applications are for development at Ravensbourne School, Hayes Lane, Bromley, which are relevant to this proposal:

DC/15/05521 - A planning application for temporary accommodation to take the first year 6FE pupils on the Ravensbourne School site was submitted to the Council on 18th December 2015. This was deferred from Plans Sub Committee and the applicant subsequently appealed against non-determination. On 17th November 2016 Members at Plans Sub Committee agreed not to contest the appeal, and the final decision from the Planning Inspector is awaited at the time of writing this report.

DC/16/04712: Temporary siting of a two-storey structure for educational use (Class D1) for two academic years (until 31 July 2019) and associated external works including access ramp and stairs.
This is a duplicate application for temporary accommodation submitted under ref 15/005521 and the report for this application appears elsewhere on this Agenda.

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
- Highways and Transport
- Design, Layout and Scale
- Residential Amenity
- Trees and Landscaping
- Temporary Accommodation and Phasing
- Contributions
- Other Technical Issues

It should be noted that this is an Outline application and at this stage the applicant has asked the Council to consider Scale, Layout and Access with Appearance and Landscape reserved for later consideration

Principle of Development

- Urban Open Space

The site is designated Urban Open Space and 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.

In their Planning Statement the applicant states in the section entitled The Land Use Policy Considerations that *“the 2006 is out of date and para 14 of the NPPF sets out the approach to decision-making when a plan is out of date. It suggests for decision-making that this means granting permission unless there are any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. The considerations when reaching a conclusion on this aspect involve the level of education need, the approach of the emerging development plan, the availability of alternative sites and the benefits of the development.”*

It is considered that this UDP policy is not out of date and the policy also complies with Policy 7.18 of the London Plan which is discussed below. The main elements of the UDP policy in the Proposed Submission for the Draft Local Plan indicate the Council’s view of the way forward for this policy in the future.

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.

Turning to the London Plan, Policy 7.18 supports 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.’*

In their comments in the Stage 1 report from the GLA on this matter, they ask the applicant to demonstrate that the proposal fully complies with the London Plan Policy 7.18 requirements set out above.

In the Planning Statement and the Design and Access Statement, the applicant advises that

- the site has been vacant and disused for a number of years and has become overgrown
- a large part of the site will revert to its community use for sport and recreation
- The large majority of the site will remain open and for outdoor recreation:
 - the total site coverage of buildings is 13,508 sqm Gross External Area

- the total site coverage of pitches, car parking, circulation, hard and soft social and formal play areas is 33492 sqm
- The scheme will deliver high-quality sports pitches and out-of-hours community use, this being its previous use but now almost 20 years ago.

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.

Taking this policy in isolation, 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.

The Proposed Submission for the Draft Local Plan (Nov 2016) indicates the Council's view of the way forward for this Urban Open Space 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 should be noted that the application site was initially identified for education use in the document entitled Draft Allocations, further policies and Designations (September 2015). However, the site has not been brought forward for allocation in the emerging Draft Local Plan.

The proposed new build development to provide a secondary school, would not comply with this draft policy as it provides for the construction of a new school whereas the policy is restricted to the building of extensions or additional buildings where a school is already located in the UOS.

All of the up to date and emerging Urban Open Space policies seek to ensure that proposals would not unduly impair the open nature of designated UOS. In the case of this proposal, the introduction of built development on the site will have an impact on the openness of the site. However, measures have been taken to limit the impact, although this cannot be completely eliminated, as follows:

- Siting the buildings in the south eastern corner of the site adjacent to the built development at the David Lloyd Sports Centre, thereby keeping a cluster of buildings in close proximity to each other.
- Retaining open landscape, in the form of pitches, in the most visible public locations, for example along the street frontage and adjacent to the Rugby Club. This has the effect of co-locating adjacent open spaces which continues the contribution of the site to the overall openness of the area.
- Careful consideration of the external materials for the proposed building and fencing to minimise the bulk of the structures and their appearance within the open space.

The next section of the report will assess whether there are other material planning considerations which may be considered to outweigh the harm to the loss of UOS and justify some loss to the provision of open space on this site.

Notwithstanding the conclusions below, the current adopted and emerging policy position supports the protection of the UOS designation and a new school would not comply with adopted Policy G8, London Plan Policy 7.18 or Draft Local Plan policy 55.

- Educational Policy

This section sets out the national, regional and local planning policy background for considering an application for a new school.

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. The Draft Local Plan was approved for consultation at Executive Committee on July 2016. 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 – this policy 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 a need.

Therefore, proposals for new schools should be given positive consideration and should only be refused where there are demonstrable negative local impacts which substantially outweigh the desirability of establishing a new school and which cannot be addressed through the appropriate use of planning conditions or obligations.

- Educational Need

The most recent update of the Secondary School Development Plan, which is reflected in the updated Education Background Paper, was agreed by the Council (Portfolio Holder) in Jan 2016. This indicates 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 this progresses in accordance with the site allocation in the draft Local Plan Policy 29, one of these new schools would be Bullers Wood Boys School and the other could be 1 Westmoreland Road or the Kentwood site. It is considered unlikely that other sites identified for secondary schools at Turpington Lane allotments, Bromley Education Trust and land adj to Edgebury Primary School could be available in the timeframe needed to provide sufficient FE places for 2018/19 due to the time required to change their current designation from Green Belt to UOS through the plan process, if this is ultimately supported at the Examination stage of the Plan.

There are 3 sites that have been approved by the Secretary of State for Education to open a Secondary School, namely Bullers Wood School, Eden Park High School and 1 Westmoreland Road. Planning permission has not been granted for education use and buildings on any of these sites. At this time, planning applications have been received for Bullers Wood School on St Hughes Playing Fields and Eden Park High School on the South Suburban Co-Op site.

In addition there is Ministerial approval for the opening of a University Technical College (UTC) which has been altered to take in students from 11yrs at 1 Westmoreland Road. Pre-application discussions for the site at 1 Westmoreland Road are underway and the current programme for this site is to submit a planning application in January and be open for pupil intake in September 2019. Subject to a planning application being submitted and agreed this provision will contribute to the need for imminent secondary provision. However, the timeframe to meet the need, as identified above, is extremely short.

If two 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.

If Bullers Wood School does not go ahead the shortfall by 2019/20 is projected at 491 places (16/17FE). Without both Bullers Wood School, which is elsewhere on this agenda for consideration 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.

It should be noted that the planning application for Bullers Wood Boys School appears elsewhere on this Agenda.

Turning to the longer term education need in the borough, the figure of up to 34 Forms of Entry 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 the 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. Admissions 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 for an 11 or 12 FE deficit which makes 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 by current pupil place legislation.

The decision “not to contest” the 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 and 2018, 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.

Members should note that a duplicate planning application for an identical proposal for temporary accommodation for new pupils for Eden Park High School has been submitted (ref 16/04712) and the report for this proposal appears elsewhere on this agenda.

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.

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.

There is therefore policy support nationally, regionally and in the draft Local Plan for the provision of necessary school places. The demonstrable and imminent 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 outlined 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 proposed policy alteration to increase the flexibility of Urban Open Space (UOS) in respect of the expansion of existing educational facilities.

The first assessment of sites, involving the expansion of existing schools, does not identify a sufficient number of sites and forms of entry to address the identified need.

Therefore it has been necessary to identify sites for new schools. This involves sites which could be policy compliant in terms of land use but also the redesignation of existing school sites which are currently located in the Green Belt (GB) and on Metropolitan Open Land (MOL) as Urban Open Space along with specific site allocations.

The assessment found that there were insufficient policy compliant sites to fully address the identified need (known as Group 1 sites).

To identify sites for redesignation, a 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. 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.

However, 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. However, 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 sites in ranked Groups 1, 2 and 3 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.

As a result of this site selection process, two free school sites which are available and deliverable were identified namely, Bullers Wood School for Boys and Eden Park High School (previously known as The Beckenham Academy). However, of the two sites, only the site at St Hughes Playing Fields has been taken forward as an allocated site in the draft Local Plan.

To support the planning application, the Applicant has also undertaken their own site search and assessment process, in conjunction with the EFA, of all potential sites that could meet the identified education need and to demonstrate why shortages cannot be addressed on alternative sites. The findings of the report are summarised below.

The initial criteria for the site search required sites to be located close to the Beckenham and Penge wards, a site or building large enough to accommodate 9,701 sqm (98,705 ft²) which would accommodate 1200 pupils, large enough to provide external space for informal outside space and, ideally, sport pitches. The sites were also assessed against the criteria of the school and Department of Education (DfE)/Education Funding Agency (EFA) which include availability for acquisition (on-market), value to the public purse, large enough, capacity for walking/cycling in the catchment area, preferably conversion of an existing building.

The search started in October 2014 and by March 2015 five sites had been identified that were then assessed in more detail for their suitability and only 2 were found to be feasible, namely the application site at the former South Suburban Co-Op sports ground in Balmoral Avenue (4.7ha designated Urban Open Space) and the Cegas sports ground in Worsley Bridge Road (2.2 ha designated Metropolitan Open Land). The report recognises that both sites have high planning risk and involve development of undeveloped land with protective designations.

Both sites were then further assessed for the characteristics of the site, availability, suitability for development, deliverability and affordability. At the time of the applicant's site assessment, the Local Planning Authority were

supporting future educational development on the Balmoral Avenue site in the draft Local Plan process (the site was subsequently removed) but not on the Cegas site. In addition, the sites are located close to the identified area for a new school and freehold acquisition terms were achievable on both sites.

On availability and being suitably located, along with being larger and having lower planning risk in terms of protective designation (than the Cegas site), the Balmoral Avenue site was selected by the applicant.

The report goes on to say that the proposed scheme will provide benefits beyond the education need including retaining a substantial amount of open space for outdoor recreational use and providing pitches and training areas for community use.

In addition, the report comments on the draft sites for new schools identified in the draft Local Plan as follows:

- *The following sites confirm the approach in the Council's Proposed Submission Draft Local Plan that they would not be suitable for co-location: Beaverwood School, Ravens Wood School, Darrick Wood School*
- *The following sites have been already been identified for education use: St Hughes Playing Fields, 1 Westmoreland Road, Widmore Centre*
- *Turpington Lane Allotments – the site is not a suitable size for a school and not available or deliverable within sufficient timescales for Eden Park School*
- *Kentwood site – this is not currently available within the timescales to provide 17 secondary FE by 2018/19 and it has only been identified for 4 FE whereas the Balmoral Avenue site could deliver 8FE to help identify the considerable need in the borough.*
- *Bromley Education Trust on Hayes Lane – no feasibility study to demonstrate that the 2.9ha site is suitable for a secondary school, the site is in Green Belt and no school has been identified. The site is not suitable for Eden Park School.*
- *Land adjacent to Edgebury Primary School – the site is Green Belt and will need to be reassigned through the Local Plan process, a new school would have significant visual impact on the openness of the Green Belt, low accessibility for public transport and loss of existing playing fields. The site is not available due to the time needed to redesignate the site so is not suitable to enable delivery of Eden Park School within a suitable timeframe.*

This further identifies that alternative sites for new schools are limited within this part of the Borough and in all cases have restrictive designations that policies seek to preserve, are not available, not suitable for education use or too small. 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 GLA, in their Stage 1 comments, requires an alternative site search to justify development on existing designated sites and open land. It may be considered that the site selection process carried out by the applicant as set out above, and the initial identification of the site as part of the Local Plan process are the strongest justification that would be possible in this regard at the present time, acknowledging that the site was deleted from the draft Local Plan list of sites for schools.

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 that 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 GLA Stage 1 report requires the applicant to demonstrate that there would not be a loss of sports facilities for which there is a defined need, and the applicant would need to demonstrate that the existing playing fields do not currently meet an identified current or future demand as they stand. The applicant needs to confirm what consultation with local residents, nearby schools, local cricket, rugby and football clubs has been undertaken so that any displacement can be assessed. A community use plan, which makes available the new sports facilities for the use outside school hours should be secured.

In terms of the use of the playing fields the applicant advises that they have not been in use since the early 1990's. The current proposal amounts to a partial loss of green space and playing fields on the site.

Comments have been received from Sport England (who are not a statutory consultee for this application as the pitches have not been in use for at least 5

years). Sport England have contacted the ECB, England Hockey, the FA, the RFU and the LTA who have expressed possible interest from local clubs for the use of both the internal and external facilities that would be provided on the site.

Following some changes to the scheme requested by Sport England, they now consider that the proposal meets Sport England's Playing Fields Policy E5 and Paragraph 74 of the NPP, subject to conditions requiring the submission of a community use agreement, a detailed assessment of the ground conditions of the land and implementation of the findings of the report and the construction of the Sports Hall and MUGA to Sport England's Design Standards. These have been recommended accordingly.

For the reasons above, it is considered that there is no overall loss of playing pitch provision on the site and high quality outdoor pitches and indoor sports facilities 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.

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 6.2 and 6.3 of 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 the respective wheelchair accommodation. Cycle spaces should also be provided under these policies.

The applicant has submitted several documents relating to transport and highway issues, namely a Transport Assessment, a letter dated November 28th, an email dated November 17th with details of predicted use of public transport, a Technical Note responding to comments from TfL received on

December 21st and a Travel Plan. The reports assess the impact of the development on different travel modes available to pupils and staff

- Proposed Access Arrangements

Access is a matter to be considered at this stage for this outline application.

The development proposes 2 new vehicle access points to Balmoral Avenue. A two-way access will be provided set back from the north eastern boundary and an exit only access will be in the centre of the frontage. The vehicle entrance access leads into the frontage car park area and also to the access road that runs along the eastern boundary up to the main school car park.

The submitted plans show access to car parking spaces which are identified as parking for staff only. Beyond this parking is a wider roadway which will provide for on-site coach parking, when required, and also a pupil pick-up and drop off area for approximately 5 cars. It is intended that car borne pupils can be dropped in this area and cars will then exit the site to Balmoral Avenue. Revised plans show that the exit to Balmoral Avenue will be left turn only, preventing cars leaving the site from turning right along Balmoral Avenue. This is to help alleviate congestion at junctions in Eden Park Avenue, the details of which are discussed later in this section of the report

Two pedestrian access points are also shown; one adjacent to the main vehicle access close to the north eastern boundary and the other set back from the north western boundary. The latter is also shown to provide cycle access. Once on site pedestrians will make their way to the main pedestrian route from the frontage of the site to the main school building which runs between the proposed football pitch and the internal access road. Safety measures to ensure adequate protection of pupils from moving traffic where internal roads and pedestrian routes are next to each other is required and a condition requiring submission of details is recommended.

Plans showing the swept paths for the new access and egress to the site and the drop-off and pick up area, which is also used for coach parking when necessary, have also been submitted.

The Highways Officer advises that the configuration of the new access points is acceptable in terms of vehicle and pedestrian sightlines in principle, however a condition requiring the submission of detailed design of the junctions in this respect is recommended.

To ensure that the vehicle access and internal parking arrangements are controlled to prevent unauthorised use, a condition requiring the submission and approval of a Car Park Management Plan is also recommended.

- Impact of traffic generation on the capacity of the Strategic Network

The submitted TA has identified the proposed traffic levels and these have been sourced from travel survey data of staff and pupil car borne levels and

modal splits at Ravensbourne School. The worst case scenario estimates that a total of 192 arrivals travelling along Balmoral Avenue and 35 park and stride arrivals on Eden Park Avenue or Upper Elmers End Road in the morning with 156 arrivals and 26 arrivals respectively in the afternoon. The applicant advises that the target level is 71 arrivals along Balmoral Avenue and 18 park and stride in the morning is expected to be met through the implementation of a School Travel Plan.

To assess the impact of the development on the local highway network, the applicant has carried out Transport Feasibility Assessments of four junctions that could be affected by the development, namely:

- Balmoral Avenue/Upper Elmers End Road,
- Balmoral Avenue/Eden Park Avenue,
- Eden Park Avenue/Croydon Road, and
- Dunbar Avenue/Eden Park Avenue.

Initial findings identified that the junction at Eden Park Avenue/Croydon Road would exceed the accepted Ratio to Flow capacity (RFC) standard which would result in greater queuing and delays than currently exist for two 15 minute periods from 08.15 to 08.30 and 08.30 to 08.45 during the AM peak. The results based on the target traffic generation showed the junction exceeded capacity for one 15 minute period between 08.00 and 08.15. The results for all other junctions show that the traffic generated by the development would not exceed the Ratio to Flow capacity, thereby not significantly affect the operation of these junctions.

TfL consider that the approach to trip generation and modal split to be robust. However, they have expressed concern about the impact on the surrounding highway network as follows:

At the junction between Eden Park Avenue and the a222 Croydon Road, which forms part of the Strategic Road Network (SRN), the capacity assessment indicates that the junction will perform over capacity in the AM peak as a result of the proposed development. Despite Travel plan modal shift targets, TfL considers that the development will have a significant impact on the SRN and therefore is not compliant with London Plan Policy 6.3.

To address this concern, TfL have indicated a potential solution as follows:

To alleviate the impact of the proposed development on the junction between Eden Park Avenue and Croydon Road, the applicant should consider the implementation of a one-way entry and exit system with a right-turn ban on the exit on to Balmoral Avenue. This would have the effect of preventing vehicles from routing north bound on Balmoral Avenue from the site to disperse the traffic on the wider network, via Balmoral Avenue and Upper Elmers End Road which is less congested. The junction geometry should be designed as such to physically deter right-turn manoeuvres from the site. This should be accompanied by swept path analysis to consider the movement of all vehicles including larger vehicles (such as coaches and refuse).

In response, the applicant has reviewed the Ratio to Flow capacity data to assess the impact of the suggestion for a left-turn only exit from the car park to assess the impact on the Balmoral/Upper Elmers End Road and the Eden Park Avenue/Croydon Road junctions.

The submitted data shows that the revised exit arrangements will reduce predicted car departure trips to the north by 47 which would have a reduction on the affected junction. There would be one 15 minute period in the AM peak when the RFC standard was exceeded but this is by less than the original predication and would result in less queuing traffic at the junction. The applicant advises that the predicated capacity is not considered unreasonable in the network peak period and therefore there is some benefit in providing and exit arrangement when traffic leaving the school site turns left out only.

The operational capacity of the Balmoral Avenue/Upper Elmers End Road junction has also been tested to consider the impact of all vehicles using the on-site drop off facility turning left out of the school site. The data shows that the junction has the capacity to accommodate this additional traffic and there would be no adverse queuing or capacity problems as a result.

TfL have provided revised comments which state that:

the proposed access arrangements have been amended to provide a one way route, with left turn only restriction on the egress to Balmoral Avenue, to alleviate the impact on the junction between Eden Park Avenue and Croydon Road. This will be subject to a detailed design process, including a Road Safety Audit, to be approved by the Council and should include signage to enforce the banned right turn manoeuvre.

A condition to this effect has been recommended.

In summary, the application will have an impact on the surrounding road network. The relevant data submitted by the applicant is considered to be robust by Transport for London. The predicted traffic levels from the development will be an adverse impact on one junction, namely Eden Park Avenue and Croydon Road, which is already overcapacity, for one 15 minute period in the AM peak. The applicant has submitted a solution whereby traffic leaving the on-site drop off area hall turn left only and this has reduced pressure on this junction, although it is still over capacity compared with the existing situation. However, this is not considered to be unreasonable in the network peak period.

On the basis of the information above, it is considered that the predicted impact on the highway network and on highway safety is acceptable.

- 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 Travel Plan sets out the measures that the school propose to engage to reduce the dependence on car borne journeys as a travel method to and from the school.

The submission of the Travel Plan is acceptable in principle and is 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

Submitted details and data in respect of drop off and pick up times have been provided for the worst case scenario where the school is running at full capacity and also where the predicted reduction in car borne trips that could be achieved with an active Travel Plan have not been achieved.

In the worst case scenario there is insufficient number of on-street parking spaces in Balmoral Avenue, Eden Park Avenue and Upper Elmers End Road to accommodate all of the predicted vehicle demand in the AM and PM peak times, should all cars arrive at the school at the same time. However, it is unlikely that this would be the case and to reduce the demand for spaces, the applicant has advised that the two 6th form years leave the site at 5pm.

A wider parking survey in the TA has shown that there are spaces beyond these roads during peak times that could be used for park and stride.

Taking account of the measures in the Travel Plan to reduce demand for car parking, the number of car arrivals and park and stride trips is predicted to fall to levels where these vehicles can be accommodated in Balmoral Avenue, Eden Park Avenue and Upper Elmers End Road.

To further ease demand for on-street parking at pick up and drop off times, the frontage car park will provide drive through access for off-street drop off. The applicant has calculated that with space for 5 cars on the site at any one time with a 20-30 second stop time, between 150-225 drop-offs can be made in a 15 minute interval.

It is also noted that the intake of pupils to the school will be incremental with 540 pupils joining in 2019 and a further 180 pupils each year until 2023. The applicant advises that this will allow time for the Travel Plan to become established and therefore the amount of pupil travel by car can be restrained.

For the proposed arrangements for dropping off pupils via the frontage car park to work, it will be necessary for a Car Park Management Plan to be submitted and approved by the Council and then implemented by the school.

A condition has been recommended and the CPMP should include the following information

- Operating times of the school and facilities available for community use.
- Management arrangements at the beginning and end of the school day for pupil drop-off and pick-up. The layout envisages a barrier to control access to the rear car park during the school day.
- Management arrangements at the beginning and end of the school day for staff parking.
- Management arrangements at the end of the school day on weekdays and at weekends for the community use of school facilities.

In terms of staff travel, the number of staff, support staff and catering staff envisaged for a fully operational school is approximately 120. Based on the hands up survey at Ravensbourne School, it is expected that approximately 83% of staff will travel by car borne modes. The 2 car parks shown on the plans will provide a total of 103 parking spaces, which includes 5 disabled spaces. On this basis, it is envisaged that there will be sufficient space on site to accommodate the predicted demand for staff parking

It should be noted that TfL strongly advised that the applicant should reduce the number of on-site car parking spaces proposed.

The applicant has considered the request and advises as follows:

- London Plan policy 6.13, para 6.42j allows a more flexible approach to parking in Outer London.
- Balmoral Avenue is a residential street with many properties having off-street parking. Parking outside schools is an emotive subject for residents and can lead to inconvenience, complaints and safety concerns.
- For this reason, parking for staff is provided on site as well as some provision for pupil drop-off and pick-up.
- The School proposals are supported by the School Travel Plan and targets have been set which are considered realistic by TfL.
- Nevertheless, some pupils will travel by car and therefore some provision is proposed at the beginning and end of the school day, in an effort to mitigate the potential concerns of residents living local to the school.
- It is considered that reducing the proposed level of parking would lead to increased concern from residents.
- With regard to the operational capacity concerns of the Croydon Road junction, reducing car parking for staff would not assist, since there are no staff departures in the AM peak.

TfL has expressed disappointment that proposed car parking has not been reduced. They have advised that the demand and use of the parking should be monitored via a robust Car Park Management Plan, the submission of which should be secured by condition.

- Non car borne travel, including public transport, cycling and walking

The TA has identified the travel modes for pupils to and from Eden Park High School using a whole school 'Hands Up' survey of pupils at Ravensbourne School in May 2016. The survey revealed the following results;

Travelling to School – 29.2% walk; 1.2% cycle; 13% car; 58.6% bus; 4.8% train

Traveling from school – 31% walk; 1.2% cycle; 3.2% car; 59.8% bus; 4.8% train

For walking, the reports set out that the desirable walking distances for schools, including walking distances to bus stops, as set out in the recognised guidance documents and looks at the local footpath network. The report concludes that the bus stops are readily accessible using existing streets and are within the maximum recommended walking distance identified in the IHT publication entitled 'Guidelines for Planning for Public Transport in Developments' and within the PTAL assessment area and is considered that journeys on foot are a realistic prospect for future staff, pupils and visitors to the site.

For cycling, the report considers the availability of cycle routes and cycle distances from local residential centres within 5km of the site. It also looks at the London Cycling Guide for infrastructure advice. The submitted plans show 225 cycle parking spaces for staff and pupils which, the applicant advises, corresponds to the London Plan 2015 standard in this respect. This section concludes that there will be adequate cycle storage on the site and given the age of pupils this could be attractive to both pupils and staff and will be encouraged.

Transport for London initially commented that an additional 17 spaces were required to meet the London Plan. The applicant has submitted amended plans showing the provision of 242 cycle parking spaces which is now considered acceptable.

For bus travel, the TA report sets out distances to bus stops in Upper Elmers End Road and Eden Park Avenue. Access to north and south bound buses on Upper Elmers End Road is a maximum of 400m from the school gate with similar distances for buses along Eden Park Avenue.

Transport for London requested additional information from the applicant which has been supplied. TfL has assessed the information submitted by the applicant in respect of the impact on buses in the school catchment area and advises that the additional trips envisaged can be accommodated on the network. They go on to say that the school should encourage students to walk to alternative bus stops to disperse the demand and requests that the school consider options of stagger the arrival and departure times of pupils to also aid dispersal for bus travel.

The applicant advises that they will consider staggering the arrival and departure times for the 2 6th form year groups. This measure is referred to in the Travel Plan.

For train and tram travel, the closest station is at Elmers End which is 0.85km from the school gate which is within the maximum walking distance threshold in the Institute of Highways and Transportation Guidance. There is also a National Rail train station at Eden Park which could be used by pupils.

- Highway impact of community use

The applicant has provided details of the proposed community use that they envisage for the school. This involves the use of the sports hall and its integral dance studio and the Multi Use Games Area (MUGA) It is envisaged that the football pitch will be used for community purposes but details of the impact on the highways network has not been submitted at this time.

In terms of traffic generation, the impact of the proposed community use is assessed in the document dated November 28th 2016. Community use will start at 18.00 and the site will be cleared by 21.30 on weekdays and from 09.00 to 16.00 on Saturdays and Sundays. The applicant predicts that use of the school hall and dance studio could generate up to 80 people and the MUGA could generate up to 72 people at any one time totalling 152 people, if each of these facilities was being used to its maximum extent at the same time. In addition, the applicant advises that the community uses will not operate on those occasions when car parking is not available due to other school events taking place.

The on-site frontage car parking would be available from 18.00 and the parking in the main car park would be available from 18.30. The main highway effect would be between 17.45 to 18.15 on weekdays which is after the evening peak identified in the Transport Assessment. The National Travel Survey 2015 suggests that for all trip purposes 64% of all trips are made by car. On this basis, if all the facilities are used at the same time, around 97 community car trips could be generated.

In terms of the impact on the highway network, the TA has considered the impact of much higher traffic flows generated during pupil pick up and drop off times and found that the operational capacity of the 4 junctions can accommodate these higher Ratio to Flow rates. Therefore, it is anticipated that the traffic generated from the worst case scenario for community use would not adversely affect the strategic capacity of the highway network.

In term of car parking availability, the frontage and main car parks, which provide 103 parking spaces, will be available from 18.00 and 18.30 respectively and it is considered that this will accommodate most of the visiting cars. The TA on-street car parking surveys of Balmoral Avenue and surrounding streets indicate a vacancy rate that could accommodate additional cars if the need arises. Details of the community related use of proposed car parks will be included in the Car Park Management Plan

On this basis, it is considered that the traffic generated by the proposed community uses can be accommodated by the highway network and in the proposed car parks or using vacant on-street parking spaces.

- Servicing and refuse collection

All refuse collection, servicing and deliveries to and from the site will take place from the proposed access to Balmoral Avenue. A bin store area is shown adjacent to the main school building.

Plans showing the swept paths and turning area in the main parking area have been submitted which show that large vehicles can manoeuvre around the proposed parking spaces in this area. The plans also show that large vehicles can manoeuvre around the proposed frontage car park area and can leave the site using the left turn only exit access.

- Highways summary

There is no doubt that introducing a new school into a primarily residential area will generate a significant amount of activity and will have an impact on the highway network and local parking provision.

The applicant has presented evidence regarding all aspects of the impact of different travel modes by staff, pupils and community use of the school after hours.

The reports conclude that the local highways network can accommodate car borne staff and pupils at peak AM and PM times, taking account of the exit arrangements of the car park and the measures that the school envisages implementing to deter car borne travel through the School Travel Plan, which have been supported by Transport for London.

In terms of demand for car parking for staff it is considered that this can be accommodated within the proposed on-site car parks. For pupils, it is considered that the surveyed on-street parking capacity on local roads, the provision of an on-site drop-off facility and the implementation of a Car Park Management Plan will enable car borne pupils to be accommodated without causing unacceptable traffic congestion in Balmoral Avenue. The school anticipates reducing the number of predicted car borne pupils, through the Travel Plan, by the time the school is fully operational

In terms of the community use, it is considered that the likely traffic generation from the use of the MUGA, the main sports hall and dance studio and the football pitch can be accommodated using on-site car parking and vacant on-street car parking spaces in the immediate and vicinity further afield. Detailed consideration in this respect can be undertaken during the drafting of a community use agreement to further mitigate the impact of out of hours use of the school.

Overall, the highways impact of the development is considered acceptable and in accordance with identified policies.

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, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation. New development must create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and are visually attractive as a result of good architecture and appropriate landscaping.

This is an Outline application and, in this instance, Layout and Scale are to be determined at this stage with appearance and landscaping retained for future consideration as Reserved Matters. The applicant has not provided any information at this stage to indicate the likely appearance of the building or the proposed landscaping treatment within the site.

In terms of layout and scale, the relevant policy requirements are set out in Policy BE1 which requires new development 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 around buildings should provide opportunities to create attractive settings.

The Design and Access Statement sets out the design evolution process for the site and the final layout for the site takes account of feedback from public consultation and pre-application advice from planning officers.

The layout of the site shows the main school building and the sports hall located together in the south east corner of the site. This sets the buildings to the rear of the site. There is clearance 17.3m from the south-east elevation to the boundary with the David Lloyd Sports Centre, which is a group of buildings of comparable size and configuration to those on the application site. Clearance to the southern boundary, which backs on to the elevated railway, is 3m. The nearest rear elevation of a residential property is 60m to properties in Lloyd Way which is separated from the building by the elevated

railway. The rear elevation of properties in Upper Elmers End Road, which have uninterrupted view of the new buildings, is 86m from the main building.

This will result in the built form of the development being located as far as possible from many of the residential properties that back on to the site as possible in an effort to reduce the impact of the development on these neighbours. In addition, the buildings will be set back as far from the front boundary of the site as possible which will limit the visibility of the buildings from the street.

It is considered that the design for the site layout and configuration of the proposed buildings has limited the impact of the introduction of the new buildings within the Urban Open Space, albeit there remains an obvious impact on the openness of this green space as a result of the built development proposed.

The remainder of the site accommodates playing pitches and the proposed car parking. The main car park is set to the east of the main school and behind the Sports Hall which sets it a considerable distance from residential properties. The frontage car park is set away from the boundaries with properties in Mountbatten Close and No 45 Balmoral Avenue, in order to provide some separation and protection from noise generated by school traffic. Submitted plans also indicate that acoustic fencing will be provided around these properties details of which can be secured by a detailed condition.

Playing pitches cover most of the remainder of the site and will make a significant contribution to the landscape of the site. There will be activity resulting from the use of the pitches. However, the applicant has indicated that the impact of this can be minimised using acoustic fencing around the site and tree and shrub planting along the most affected boundaries.

In terms of scale, the overall height of the 3 storey main building will be 12.90m and the sports hall will be 9m high. In order for the development to be acceptable to the Environment Agency in terms of flood risk, the finished floor level of the development must be no lower than 37.66m AOD or 150mm above the existing ground level, whichever is the greater. The submitted topographical plans show this part of the site between 38m and 39m AOD which will result in the tallest building being just over 13.5m above the existing ground level or 52.90 AOD.

Taking information from the Design and Access Statement, the proposed buildings would occupy approximately 28% of the site with the remainder set aside for pitches, car and cycle parking, landscaping and servicing area.

In summary, it is considered that the proposal would result in development that respects the scale, form and layout of adjacent buildings and areas. The main buildings are set back from Balmoral Avenue and the frontage of the site retains an open appearance with views into the site. In addition, the layout provides space around the buildings to create hard and soft landscaping to improve the setting of the buildings.

In assessing the impact of the development on the character and appearance of the area Policy BE1 requires development proposals to meet the following criteria:

- Should not detract from the existing street scene and/or landscapes and should respect important views, skylines, landmarks and landscape features;
- Space around buildings should provide opportunities to create attractive setting with hard and soft landscaping.

The local area is characterised by a mix of uses and style of buildings. To the north, west and south are residential properties mainly comprising terraced house and flats. To the south the houses are separated from the site by an elevated railway line. To the east are playing fields and the buildings that comprise the David Lloyd Sports Centre. From Balmoral Avenue, the site is hoarded at present but provides a landscaped area that creates a break in the urban fabric of the street.

A Landscape and Visual Impact Assessment of the development has been undertaken by the applicant to consider the impact on residents and the wider community. The report follows an objective methodology to establish the landscape character of the site and the effect of the development on that character. The report also assesses the visual effect of the development on local residents and this will be discussed in the next section relating to impact on neighbour amenity.

The landscape character assessment is based on reports relating to arboriculture, ecology, archaeology, flood risk and soil. The site is designated Urban Open Space but is not subject to any national landscape or statutory designations. The assessment concludes that the landscape is defined as “medium value at a local level. Pleasant but ordinary landscapes with intrusive elements such as infrastructure, unattractive buildings and industrial areas. Poor vegetation structure and management. Typified by urban fringes.”

In terms of the impact of the development on the landscape the report concludes that whilst the proposal will cause change to the immediate character of the site, the impact will be very local and within the wider context of the urban townscape there will be very little change. The landscape effect has therefore been defined as neutral for the following reasons:

- The development will fit in with the scale, land, form and pattern of the landscape; and
- The development will maintain the existing landscape quality

The siting of the buildings to the rear of the site and the grouping of the proposed buildings with the existing massing of the buildings at David Lloyd Sports Centre reduces that impact of the proposed buildings on the street scene in Balmoral Avenue. The visual impact is further mitigated by the railway embankment and mature tree line to the south. The overall appearance of the site will remain as an open landscape and as such it is

considered that the proposed development would not have an adverse impact on the visual character and appearance of the area.

- External lighting, including floodlighting for pitches.

The Council's Environmental Health Officer has advised that the proposed use of low level bollards and bulkhead lights on the site is acceptable. However, the applicant does not appear to have finalised the detail of the floodlighting that they wish to provide for the MUGA and football pitch. They indicate that they wish to investigate the use of LED flooding luminaires at detailed design stage with a specialist contractor.

Concerns have been raised by residents about the impact of the floodlighting from the pitches on residential amenity. The acceptability of the MUGA and playing pitches is discussed above and no objection to the provision of these facilities is raised in principle.

It is proposed to use the MUGA until 21.00 on weekdays and until 16.00 on Saturday and Sunday for school and community use and this will require the use of floodlights. The Masterplan shows 6 x 12m lighting columns around the MUGA but with no detail of their height. The closest light column to a residential property will be approximately 80m from the rear elevation of properties in Upper Elmers End Road.

For the football pitch, it is proposed to use this for school use until 18.30 on weekdays only. The Masterplan shows 6 x 16m lighting columns around the site. The closest light column to a residential property will be approximately 25m from the rear elevation of properties in Mountbatten Close and 65m to No 45 Balmoral Avenue.

In addition, 4m high lighting columns will be provided to light the main access road.

The Council's Environmental Health Officer advises that the report still seems to expect a lighting scheme to be approved by Bromley at a later date, after they have looked at the feasibility of LED lighting. It appears, therefore, that the levels given in this report are no more than a guide and are levels which satisfy the various standards but are not derived from light distribution figures relevant to each luminaire. It is recommended that a condition be imposed requiring a lighting scheme to be approved by the Council.

At this outline stage, it is considered that the provision of floodlighting and lighting columns for the internal road access is acceptable in principle. However, this will be subject to a condition requiring the submission of an acceptable lighting scheme that provides a detailed assessment of the actual light fittings to be used on the site and their impact on residents. It is anticipated that an acceptable scheme could be put forward and this matter is considered acceptable in principle.

Residential Amenity

The relevant UDP policy relating to the impact of development on the amenity of the residents of adjoining residential properties is Policy BE1: Design of New Development, which requires development proposals to safeguard the residential amenities of the area by ensuring that their current living conditions of occupiers of neighbouring buildings are not harmed through noise and disturbance or by inadequate daylight, sunlight, privacy or overshadowing. In addition to the site coverage, height and massing, which are discussed elsewhere in this report, it is necessary to assess the impact of overlooking that may result in the loss of privacy, and noise and disturbance to fully understand the impact of the proposed development on the amenity of occupants of adjoining residential properties.

There is potential for the proposal to result in harm to residential amenity as a result of the siting of the building, intensification of the use of the site, the location of the new vehicular access points, car parking areas and internal access road and the use of sports pitches and outdoor facilities.

Turning first to the impact of the development on privacy from overlooking, the submitted Landscape and Visual Impact Assessment (LVIA) considers the impact of the development on visual amenity for residential properties around the site.

The report finds that there will be a clear view of the site in each instance and the effectiveness of existing screening, where this is in place, is discussed.

The findings of this part of the LDIA relating to sites where there is a substantial or substantial/moderate impact has been summarised elsewhere in this report. In each instance, the primary mitigation offered is in the form of tree and shrub planting to supplement existing boundary tree screening, using native and evergreen species to provide winter screening. In addition, the report recommends the use of sensitive colour and materials for the school buildings and the boundary and internal fencing. In terms of the impact of the floodlighting, this could be mitigated by limiting the hours of operation of the lights and the careful design of the light fittings to minimise upward and downward light spill and this is acceptable in principle as set out above.

Whilst the suggested tree screening will soften the visual impact of the development, in many instances it will not completely remove views of the buildings and pitches in the winter. However, it is considered that the visual impact of the development following implementation of the mitigation measures described above and the chance for planting to become established and mature, is not so harmful as to justify a reason for refusal of the development.

It should also be noted that there is a significant separation distance between the school buildings and the neighbouring dwellings and, as such, the buildings will not appear overbearing or dominant. Whilst there will clearly be a change in the outlook from some properties which currently look out across

open and undeveloped land, this does not present significant grounds in itself to warrant refusal of this application.

In terms of the impact of the development on privacy, the main source of overlooking will be from any upper floor windows located in the south western elevations of each wing of the proposed building. The properties most affected by this are in Upper Elmers End Road and Lloyd Way where the closest back to back distance between the school and rear elevation of these properties is approximately 84m and 54m respectively. In addition to tree planting along the boundary, the applicant has advised that measures to reduce the impact of overlooking through the careful design of the window openings could be accommodated at the detailed design stage of the Reserved Matter relating to the appearance of the building.

The south-east and north east elevations will overlook the David Lloyd Sports Centre and the Rugby Club pitches respectively which will not suffer adversely in this respect. The north-west elevation will face properties in Mountbatten Close and Balmoral Avenue but these are separated by a minimum distance of approximately 129m which is considered to be sufficient separation to minimise loss of privacy.

It is not considered likely that occupants of residential properties will suffer a loss of overlooking from the use of the pitches or car parking and internal access road. The majority of private gardens of properties overlooking the site are protected by fencing. The applicant is proposing additional 1.8m fencing around the whole site to provide additional protection for occupants of neighbouring residential properties. A condition requiring details of the fencing is recommended.

In addition, a Noise Assessment has been submitted which considers the impact of noise generated by the activities. As previously mentioned, the report considers the impact of noise sources on the operation of the school and concludes that, subject to the implementation of the mitigation measures in the report the impact on the operation of the school will not be detrimental.

The report also considers noise generation from the Multi Use Games Area (MUGA) as this will be operating at less sociable times in the evening. The report finds that the MUGA is set back from the site boundary by 60m which will offset potential noise emission to nearby residential receivers. In addition, local panelling or fencing around the pitch will be installed utilising resilient fixings in order to reduce the noise generated by ball impacts. In addition, the 1.8m acoustic quality barrier along the majority of the length of adjacent residential properties will help protect garden areas from potential noise from the MUGA and other external areas of the school.

It has not considered the impact of the use of the football pitch as this will only operate up to 18.30 in accordance with the terms of the application. It should be noted that the current use and site conditions could revert back to the original scale of use which appears to be unrestricted.

The Council's Environmental Health Officer has reviewed the submitted report and advises that the proposal is acceptable subject to complying with the recommendations of the Noise Assessment and a condition to secure this is recommended.

With regard to the noise generated by traffic generated from car parking and the access road to the main school buildings, the acoustic fence referred to above will be erected along the boundary of the site at Mountbatten Close and No 45 Balmoral Avenue and extended along almost the full length of the Rugby Club boundary. It is considered sufficient to lessen the impact on amenities the occupants of nearby residential properties.

In terms of assessing the impact the evening and weekend community use of the site, the school have indicated a range of uses that could be available to community groups and clubs but, at this stage, it is not possible to specify the actual level of use of the school out of hours. Therefore, a specific condition is recommended requiring a Community Use Agreement to be entered into setting out the scope of the proposed community use to include details of pricing policy, hours of use, access by non-educational establishment users, management responsibilities and a mechanism for review to enable a more detailed assessment of the impact on neighbours to be undertaken.

In summary, the use of the site for education purposes will generate additional activity from people and vehicles on the site and in the local area. The school proposes to operate an extended school day, which will help reduce conflict with the closest school at Marian Vian, and will consider staggering the arrival and departure times for sixth form pupils which would help diffuse activity levels. It is considered that the impact of the general school use of the outside areas at break times and as part of the curriculum and the evening and weekend community use can be mitigated by the additional tree planting and acoustic fencing to such a level that the amenities of residents are protected.

Trees and Landscaping

Policy NE7 of the Unitary Development Plan provides policy guidance for the consideration of the impact of development on trees.

This policy requires new development to take particular account of existing trees on the site which, in the interests of visual amenity and wildlife habitat, are considered desirable to retain. Tree Preservation Orders will be used to protect trees of environmental importance and visual amenity. Where trees have to be felled, the Council will seek suitable replanting. Policy NE8 seeks to improve the amenity and conservation value of trees and woodlands and the Council will encourage appropriate beneficial management, appropriate new planting in suitable locations and promote public interest in and enjoyment of trees and woodlands.

The applicant has submitted a Tree Survey report to accompany the application. This advises that a total of 92 trees and 4 hedgerows were surveyed. Out of the 92 trees, 22 individual trees and 3 hedgerows are to be

removed. Of the 22 trees, 2 Category C (defined as low quality and value) trees are assessed for removal and the other 20 trees and the hedges are Category U (defined as poor condition with limited lifespan). The survey also advises that there will be no incursions into the root protection area of the remaining trees resulting from the construction of the development and the spatial relationship between the proposed development and the retained trees is such that it is unlikely that there will be future pressure to remove additional trees.

The majority of trees on the site are located in 2 belts along the south western boundary to the rear of the residential properties in Upper Elmers End Road and along the south eastern boundary adjacent to the David Lloyd Sports Centre. Six trees will be removed from the south western boundary belt and 12 from the south eastern boundary belt. The remaining 4 trees will be removed from the southern boundary. The report advises that 20 of the 22 trees (all Category U) need to be removed on arboricultural grounds as they are dead and should be removed for safety purposes. Two category C trees adjacent to the railway boundary and 3 hedges close to the frontage of the site need to be removed to allow the development to proceed.

The trees along the southern boundary are on Network Rail land and are protected by a Tree Preservation Order.

The Council's Tree Officer raises no objection to the removal of the identified trees and the 3 hedges and advises that the measures set out in the Tree Protection Plan are adequate for the needs of the site. The survey shows the retention of the large deciduous hedge that is on the boundary with Mountbatten Close as this will provide some visual and acoustic screening for some of the residents at both ground and upper floor levels. It is recommended that any works are carried out under the supervision of an arboriculturalist and a suitable condition is recommended.

In terms of landscaping for the site, no details of a landscaping scheme have been submitted at this stage and the applicant has retained this element of the development as a Reserved Matter for future consideration. As discussed elsewhere in this report, the Landscape and Visual Impact Assessment makes recommendations about the use of landscaping to minimise the visual impact of the development on those residential properties that overlook the site. This includes additional tree planting (both coniferous and deciduous) along the south western boundary in particular and details of all landscaping will be sought at Reserved Matters stage.

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:

- £20,000 for future traffic management schemes
- The cost of other highway works as may be required including yellow line marking for Keep Clear signs
- 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 Matters

- Ecology

In policy terms this report is assessed against Policy 7.19 of the London Plan which seeks a proactive approach to the protection, enhancement, promotion and management of biodiversity in support of the Mayor's Biodiversity Strategy.

The site has potential to support wildlife habitats and an Extended Phase 1 Habitat Survey and the subsequent Bat Activity Survey has been submitted to assess the current ecological value of the site. The report found no record of Great Crested Newts, dormouse, reptiles and badgers. There are no specially protected species of birds or breeding habitat recorded but the site does contain mature trees suitable for nesting birds. For bats the survey found that the site has moderate value for foraging and negligible potential for bat roosting and makes recommendations to retain suitable habitat for foraging and commuting bats.

In summary, due to the presence of mature trees and the railway embankment, the site is classified as having Moderate habitat, which is suitable for bats. The overall impact on the ecology is classified as of Slight magnitude which will be offset by biodiversity enhancement with landscaping including ecological areas, wild flower seed mix planting, native trees and shrubs and the provision of bat and bird boxes within the development design. A condition requiring details of site enhancements to implement the recommendations of the reports is recommended. In addition, the details of the Reserved Matter for landscaping should take account of the biodiversity recommendation of these reports as part of its submission.

- Sustainability and 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 and 5.6) and the Supplementary Planning Guidance entitled Sustainable Design and Construction. In addition, Policy BE1(vi) of the UDO, regarding sustainable design, construction and renewable energy is also relevant.

The applicant has submitted an Energy Statement which sets out measures to meet London Plan policies 5.2: Minimising carbon dioxide emissions and Policy 7.7: Renewable Energy. The report sets out the Low Energy Demand carbon emission results shows a 15% carbon reduction can be achieved from energy efficiency measures relating to the performance of the building fabric and services specification and passive design measures.

The Energy Statement has considered options for renewable energy and concludes that the installation of Solar PV panels is the most appropriate renewable energy solution.

A total site carbon reduction from energy efficiency measures and PV panels equates to an overall 35% reduction.

The GLA in their Stage 1 response advise that the carbon dioxide emission savings exceed the target set within Policy 5.2 of the London Plan. However, the concerns in regard to heating and cooling strategy, provision of the BRUKL sheets including efficiency measures alone to support the savings claimed, future proofing and a single heating system, the total PV output in kWp, roof plan and the assumed efficiency of the panels should be clarified and addressed before compliance with London Plan energy policies can be verified.

To secure this, a condition is recommended requiring the submission of a site-wide energy strategy prior to the commencement of development.

- Flood Risk Assessment and Sustainable Urban Drainage Systems (SUDS)

The site lies within Flood Zone 1 with a triangle of land located along the western boundary in Flood Zone 2. The applicant submitted a Flood Risk Assessment and a Strategic Drainage Report with the original submission.

In terms of flood risk the Environment Agency finds that the revised Flood Risk Assessment and associated Exception Test Report uses the correct methodology for assessment of the impact of flood risk and climate change. The building will be located away from the Flood Zone 2 area which will accommodate the car park and part of the pitches. However, to protect the proposed building the finished floor levels should be set no lower than 37.66AOD or 150mm above the existing ground level.

The surface water strategy identifies initial measures to reduce run-off including permeable surfaces, green roofs and attenuation tanks. Surface water drainage rates will be retained at green field rates in line with guidance. The principle of the drainage strategy for the site is considered to fulfil SUDS requirements and is acceptable, in principle, and in line with agreed standards. A condition is recommended requiring a detailed surface water strategy to consider the detailed design details for all aspects of the submitted strategy.

In addition Sport England have requested a detailed assessment of ground conditions of the land proposed for the playing field and a detailed scheme to ensure that the pitches are provided to an acceptable quality.

- Contaminated Land

Prior to the commencement of development, the applicant is required to submit a Phase 1 Desk Study and Preliminary Risk Assessment and Ground Investigation Report to identify any concerns in respect of contaminants that would pose a potential risk to human health and remediation measures should adverse land conditions be found. This should address all aspects in accordance with the requirements of Policy ER7 of the UDP. A condition requiring the submission of this report is recommended.

- Air Quality Management Area (AQMA)

The site lies within the Bromley Air Quality Management Area and an Air Quality Assessment is required to determine the impact of the development on air quality in accordance with the requirements of the Policy 7.14 of the London Plan that new developments should be 'air quality neutral' and not lead to further deterioration of air quality as a result of the development.

The applicant has assessed the impact of the development on vehicle Emissions and the impact of construction of activities.

In terms of vehicle emissions, based on the predicted mean PM10 and NO2 concentrations are unlikely to be exceeded and the impact on playground facilities will be acceptable in terms of the likely short term effect

In terms of activity associated with construction activities, the impact of dust is considered to be a low to medium risk to local receptors. The impact of dust soiling and PM10 can be reduced to negligible through appropriate mitigation measures which are summarised in the report. With these measures in place the likelihood of dust episodes occurring at those receptors adjacent to the site are considered low.

The Council's Environmental Health Officer has assessed the submitted report and advises that there are no substantial objections to air quality in terms of the impact from vehicle emissions.

In terms of construction activities concerning vehicles, he recommends the submission of a Construction Logistics Plan and for the impact of dust he recommends a Dust Management Plan for any demolition works.

He notes that that no air quality assessment has been included for any potential impact from any proposed heating system and recommends a condition to secure this assessment.

- Archaeology

The relevant UDP policy in this respect is Policy BE16: Ancient Monuments and Archaeology which states that planning permission will not be granted for development that would adversely affect scheduled ancient monuments or other nationally important archaeological sites, involve significant alterations to them or harm their settings.

An Archaeological Desk-Based Assessment has been submitted by the applicant in support of the application. The assessment did not identify any designated heritage assets within or adjacent to the site but has identified previously unidentified, undesignated assets in the form of 15th – 19th century field boundaries and a small section of 19th century (and 18th) canalised watercourse, both of which are considered to be of local significance. The assessment has also identified low – medium potential for sub-surface archaeological remains of prehistoric date. The report recommends that development is preceded by a programme of archaeological evaluation to characterise the sub-surface archaeological resource and inform a final mitigation scheme. It is recommended that this is secured as a condition of planning.

Historic England (Archaeology) have advise that there is a limited archaeological interest on the site and HE(A) has recommended a condition to require a potential two-stage process of archaeological investigation and possible mitigation.

- 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.

- Mayoral Community Infrastructure Levy

The development would be liable for the payment of Mayoral CIL. However, it is anticipated that the development will fall within the exemption category for Education and, as such, CIL will not be payable.

- 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 27th May 2016 under ref 16/02014/EIA.

Conclusions

This proposal for a new school on the application site is contrary to the adopted Urban Open Space Policy G8 in the UDP and Policy 7.18 relating to Protecting Open Space in the London Plan. In addition, the site is not allocated for education use in the draft Local Plan.

Therefore, in order for permission to be recommended for this application, as well as the impacts of the development being considered satisfactory, it would be necessary to conclude that there are sufficient material planning considerations to permit the proposed secondary education school development. Relevant material planning considerations in this case include: government advice and policy, the Bromley Secondary Schools Development Plans (Jan 2105 and Jan 2016), and the education need identified in the draft Local Plan.

This report has set out the clearly identified need for the provision of secondary school places in the borough from 2017 for the draft Local Plan period. This is set out in the Secondary Schools Development Plan 2016 and in the Education policies of the emerging draft Local Plan. The site selection process undertaken by the Council could not find sufficient places by extending existing facilities alone so there is a need to provide these places in new schools.

Eden Park High School has come forward as a new secondary school through the Education Funding Agency and with ministerial approval having been granted for a school on this site.

Despite the lack of formal allocation, this proposal does represent a deliverable secondary school site to meet a clearly identified need and this matter has significant weight as a material planning consideration at the present time.

This must be balanced with the other material considerations to be taken into account as set out in the report above.

In respect of residential amenity, the report concludes that while there is an inevitable change to the area as a result of the introduction of a new school, the development is not considered unacceptable in terms of impact in this regard.

The additional traffic generation in the area arising from the school has been assessed in terms of the impact on the highway network and the impact of car parking by the Council and Transport for London. This report concludes that although the junction of South Eden Park Road and Croydon Road will be over capacity for one 15 minute period in the AM peak, this is not an unreasonable situation and does not warrant a refusal of the application on highway capacity grounds. In terms of car parking, measures to provide for staff parking and for pupils arriving at the school by car have been proposed.

These are considered to provide sufficient space to accommodate the predicted traffic flow in the local area.

In terms of the Layout and Scale of this Outline application, it is considered that the location of the school represents the least impact on neighbouring residents and sufficient information has been provided to conclude that the pitches, car parking, circulation space and other facilities can be adequately accommodated on the site without significant harm to visual amenity or the quality of the existing landscape. The layout also represents minimal disruption to significant trees around the site that provide important screening and visual amenity. It is also an option which it is considered will least harm the Urban Open Space at the site.

Other technical considerations are assessed including drainage and flood risk, ecology, air quality, archaeology, secure by design, sustainability and site-wide energy have been assessed and found to be sufficient to meet up to date UDP and London Plan policies in each respect.

Conditions for many aspects of the development are recommended to identify and secure mitigation measures and to ensure these measures are in place and can be effective.

Additional benefits will be the community use of the school which will include the use of the MUGA, the sports hall and a dedicated dance studio. The facilities will also help meet demand for indoor and outdoor training needs identified by local sports organisations.

The demonstrated local level of need that has been identified supports a general increase in the need for school places. At national level, paragraph 72 of the NPPF requires local authorities to note the “great weight” that the NPPF attaches to the need to create, expand or alter schools; and work with school promoters to identify and resolve key planning issues before application are submitted.

In reaching a conclusion for the recommendation on this application, careful consideration has been given the government’s 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.”*

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.

With regard to all of the planning considerations set out in this report, it is considered that whilst the proposal is contrary to adopted Urban Open Space Policy, there are convincing and demonstrable material considerations that

indicate otherwise and that justify the grant of planning permission to facilitate secondary education provision. There are no other matters which are found to be unacceptable so as to warrant refusal of the application, and permission is recommended.

The application would need to be referred back to the Mayor of London if it is resolved that permission be granted, however this would not be required if it was resolved to refuse the application.

Background papers referred to during the production of this report comprise all correspondence on file ref: 92/02130/OUTMAJ, 16/03315/FULL1, 15/05521/FULL1, 16/04712/FULL1 and 16/03145/OUT excluding exempt information.

**RECOMMENDATION: PERMISSION BE GRANTED
SUBJECT TO PRIOR COMPLETION OF A SECTION 106 AGREEMENT
(relating to £20,000 for a future traffic management scheme if required, other highways works as may be required and a Travel Plan)
and REFERRAL TO THE MAYOR OF LONDON**

and subject to the following conditions

01: Details required pursuant to outline permission (see DI01)

- (i) Details relating to the
(a) landscaping, and
(b) appearance**

**shall be submitted to and approved by the Local Planning Authority
before any development is commenced.**

- (ii) Application for approval of the details referred to in paragraph (i) above
must be made not later than the expiration of three years beginning with the
date of this decision notice.**

- (iii) The development to which this permission relates must be begun not later
than the expiration of two years from the final approval of the details
referred to in paragraph (i) above, or in the case of approval on different
dates, the final approval of the last such matter to be approved.**

**Reason: No such details have been submitted and to comply with the
requirements of Section 92 of the Town and Country Planning Act 1990**

**02: The development hereby permitted shall only be carried out in complete
accordance with the details shown on the submitted plans and documents, as
follows:**

Plans:

- **Site Location Plan MAC-00-ZZ-DR – A 100 Rev P1**
- **Existing Site Sections MAC-00-ZZ-DR – A-400 Rev P1 received 01.07.2016**
- **Proposed Site Plan MAC-00-ZZ-DR- A-110 Rev P3 received 12.01.2017**

- Proposed Site Sections MAC-00-ZZ-DR-A-401 Rev P1 received 01.07.2016
- General Development Areas Plan wwa_1609_LL_103 Rev P00
- Illustrative Masterplan wwa_1609_LL_101 Rev P06 received 11.01.2017
- Landscape Sections wwa_1609_LSe_401 Rev P03 received 11.01.2017
- Topographical Survey & Underground Services Trace L7194/T/1-3 Rev 1 Sheet 1 of 3 received 05.07.2016
- Topographical Survey & Underground Services Survey L7194/T/2-3 Rev 1 Sheet 2 of 3 received 05.07.2016
- Topographical Survey & Underground Services Survey L7194/T/3-3 Rev 1 Sheet 3 of 3 received 05.07.2016
- Underground Drainage Layout MAC-XXXX-DR-P-003 Rev P2 received 09.12.2016

Documents:

- Extended Phase 1 Habitat Survey by Innovation Group dated June 2016
- Bat Activity Surveys RT-MME-122399 by Middlemarch Environmental dated October 2016
- Badger Inspection at Eden Park E2602161154 by Innovation Group dated 7th April 2016
- Tree Survey by Tree Craft Ltd dated June 2016
- Flood Risk Assessment by Resilience and Flood Risk Version 2.0 dated 8th November 2016
- Statement of Community Involvement by RONIN Marketing Ltd dated June 2016
- BREEAM Pre Assessment by Southfacing dated June 2016
- Noise Assessment by Cole Jarman dated June 2016
- Landscape and Visual Impact Assessment WWA_1609_Doc_601_P03 by Wynne-Williams Associates Ltd dated 11.01.2017
- Designers Response to Stage 1 Road Safety Audit by Sanderson Associates (Consulting Engineers) Ltd dated June 2016
- Transport Assessment by Sanderson Associates (Consulting Engineers) Ltd dated June 2016, Letter and Technical Note dated November 28th 2016 from Sanderson Consulting and Letter dated December 21st 2016 from Sanderson Consulting.
- Design and Access Statement by Mace dated June 2016
- Planning Statement by JLL by September 2016 Archaeological Desk-Based Assessment by AOC Archaeology Group dated December 2015
- Beckenham Academy, Permanent Site (Eden Park): Air Quality Assessment by gem Air Quality Ltd dated January 2016

Reason: For the avoidance of doubt and to ensure the satisfactory implementation of the development in accordance with Policy BE1 of the Bromley Unitary Development Plan

03: Details of the layout of the access roads, pedestrian access and turning area at its junctions with Balmoral Avenue, including a Road Safety Audit, and dimensions of visibility splays shall be submitted to and approved in writing by the Local Planning Authority and these access arrangements shall be substantially completed before any part of the development hereby permitted is first occupied. There shall be no obstruction to visibility in excess of 1 metre in height within the approved splays except for trees selected by the Authority,

and which shall be permanently retained. All recommendations of the Road Safety Audit must be fully adhered to

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

04: Before any part of the development hereby permitted is first occupied that part of a sight line of 4.2m x 2.4m x 43m which can be accommodated within the site shall be provided in both directions at the junction with Balmoral Avenue and with the exception of trees selected by the Local Planning Authority no obstruction to visibility shall exceed 1m in height in advance of this sight line, which shall be permanently retained as such.

Reason: In order to comply with Policy T18 of the Unitary Development Plan and to ensure that the proposal does not prejudice the free flow of traffic and conditions of general safety along the adjoining highway.

05: Before any part of the development hereby permitted is first occupied, bicycle parking (including covered storage facilities where appropriate) shall be provided at the site in accordance with details to be submitted to and approved in writing by the Local Planning Authority, and the bicycle parking/storage facilities shall be permanently retained thereafter.

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

06: The development permitted by this planning permission shall not commence until a surface water drainage scheme for the site based on sustainable drainage principles, and an assessment of the hydrological and hydro geological context of the development has been submitted to, and approved by, the Local Planning Authority. The surface water drainage strategy should seek to implement a SUDS hierarchy that achieves reductions in surface water run-off rates to Greenfield rates in line with the Preferred Standard of the Mayor's London Plan.

Reason: To reduce the impact of flooding both to and from the proposed development and third parties.

07: The development hereby permitted shall incorporate measures to minimise the risk of crime and to meet specific needs of the application site and the development. Details of those measures shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the development above ground level hereby permitted and implemented in accordance with the approved details. The security measures to be implemented in compliance with this condition shall achieve the Secured by Design accreditation awarded by the Metropolitan Police.

Reason: In the interest of security and crime prevention and to accord with Policy BE1 of the Unitary Development Plan

08: Details and sample boards of all external materials to be used for the development, including roof cladding, wall facing materials and cladding, windows and door frames, window glass, decorative features, rainwater goods and any parts of the site not covered by buildings, including roads, pathways,

communal areas, parking areas, pitches, MUGA where appropriate, shall be submitted to and approved in writing by the Local Planning Authority before any work is commenced. Such details shall include permeable materials throughout, measures to minimise surface water flooding. The development shall be carried out in accordance with the approved details.

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

09: (i) Details of fencing/barriers on the southern boundary, adjoining the railway, shall be submitted to and approved by the Local Planning Authority, in consultation with Network Rail, prior to the commencement of any part of the development. The approved fencing shall be erected prior to commencement of any part of the development and permanently maintained thereafter.

(ii) Notwithstanding the content of the report entitled Noise Assessment by Cole Jarman dated June 2016 and for all other external boundaries, details of fencing/barriers, including the specification and appearance of the acoustic fencing, shall be submitted to and approved by the Local Planning Authority prior to the first use of any of the facilities on any part of the site. The approved fencing shall be erected prior to commencement of any part of the development and permanently maintained thereafter.

iii) for all other areas and on any internal part of the site, including (but not exclusively) around pitches and to separate pedestrian and vehicle traffic, details of fencing/barriers/gates shall be submitted to and approved prior to the first use of any of the facilities on any part of the site. The approved fencing shall be erected prior to commencement of any part of the development and permanently maintained thereafter

Reason: In the interests of the visual appearance of the site and the amenities of the occupants of nearby residential properties and to accord with Policy BE1 of the Unitary Development Plan.

10: A) No development other than demolition to existing ground level shall take place until the applicant (or their heirs and successors in title) has secured the implementation of a programme of archaeological evaluation in respect of any anticipated geotechnical site investigation, in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the local planning authority in writing and a report on that evaluation has been submitted to and approved by the local planning authority in writing.

B) Under Part A, the applicant (or their heirs and successors in title) shall implement a programme of archaeological evaluation in accordance with a Written Scheme of Investigation.

C) No development other than demolition to existing ground level shall take place until the applicant (or their heirs and successors in title) has secured the implementation of a programme of archaeological mitigation in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the local planning authority in writing and a report on that evaluation has been submitted to and approved by the local planning authority in writing.

D) Under Part A, the applicant (or their heirs and successors in title) shall implement a programme of archaeological mitigation in accordance with a Written Scheme of Investigation.

E) The development shall not be occupied until the site investigation and post-investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under Parts (A and C), and the provision for analysis, publication and dissemination of the results and archive deposition has been secured.

Reason: Heritage assets of archaeological interest may survive on the site. The planning authority wishes to secure the provision of appropriate archaeological investigation, including the publication of results, in accordance with Section 12 of the NPPF.

11: Prior to commencement of construction on the site, the applicant will carry out an assessment of the effect on local air quality as a result of the heating system provided as part of the proposed development. The objective of the assessment will be to demonstrate that the design of the heating system is such that emissions of nitrogen dioxide shall not have a significant detrimental impact on existing air quality. The applicant will agree the scope of and approach to the Air Quality Assessment with the Head of Planning, in consultation with the Council's Environmental Health Officer. The development shall not be carried out otherwise than in accordance with the approved plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

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

12: No development shall commence on site, including demolition until such time as a Demolition and Construction Noise and Dust Management Plan has been submitted to and approved in writing by the Local Planning Authority. The Plan shall be implemented in accordance with the approved details and to the agreed timescale throughout the period of the works.

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

13: Prior to the commencement of the development, including demolition and removal of site material, hereby permitted a Construction Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan shall include measures of how construction traffic can access the site safely and how potential traffic conflicts can be minimised; the route construction traffic shall follow for arriving at and leaving the site, measures to secure provisions of on-site delivery, off-loading, turning and parking of construction and operatives vehicles and the hours of operation, location of wheelwash facility but shall not be limited to these. The Construction Management Plan shall be implemented in accordance with the agreed timescale and details.

Reason: In order to comply with Policies T5, T6, T7, T15, T16 and T18 of the Unitary Development Plan and in the interest of the amenities of the adjacent properties.

14: Before any work on site is commenced a site wide energy assessment and strategy for reducing carbon emissions shall be submitted and approved by the Local Planning Authority. The results of the strategy shall be incorporated into the final design of the buildings prior to first occupation. The strategy shall include measures to allow the development to achieve an agreed reduction in carbon dioxide emissions of at least 35% above the TER level required by the Building Regulations 2013. The development shall aim to achieve a reduction in carbon emissions of at least 20% from on-site renewable energy generation. The final design, including the energy generation shall be retained thereafter in operational working order, and shall include details of schemes to provide noise insulation and silencing for and filtration and purification to control odour, fumes and soot emissions of any equipment as appropriate.

Reason: In order to seek to achieve compliance with the Mayor of London's Energy Strategy and to comply with Policy 5.2 and 5.7 of the London Plan 2015.

15: Details of the proposed slab levels of the building(s) and the existing site levels shall be submitted to and approved in writing by the Local Planning Authority before work commences and the development shall be completed strictly in accordance with the approved levels.

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

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

- a) The contaminated land assessment shall include a desk study to be submitted to the Local Planning Authority for approval in writing. The desk study shall detail the history of the sites uses and propose a site investigation strategy based on the relevant information discovered by the desk study. The strategy shall be approved in writing by the Local Planning Authority prior to investigations commencing on site.**
- b) The site investigation, including relevant soil, soil gas, surface water and groundwater sampling shall be approved in writing by the Local Planning Authority.**
- c) A site investigation report detailing all investigative works and sampling on site, together with the results of analysis, risk assessment to any receptors, a proposed remediation strategy and a quality assurance scheme regarding implementation of remedial works, and no remediation works shall commence on site prior to approval of these matters in writing by the Authority. The works shall be of such a nature so as to render harmless the identified contamination given the proposed end-use of the site and surrounding environment.**
- d) The approved remediation works shall be carried out in full on site in accordance with the approved quality assurance scheme to demonstrate compliance with the proposed methodology and best practise guidance. If during any works contamination is encountered which has not previously been identified then the**

- additional contamination shall be fully assessed and an appropriate remediation scheme submitted to the Authority for approval in writing by it or on its behalf.
- e) Upon completion of the works, a closure report shall be submitted to and approved in writing by the Authority. The closure report shall include details of the remediation works carried out, (including of waste materials removed from the site), the quality assurance certificates and details of post-remediation sampling.
 - f) The contaminated land assessment, site investigation (including report), remediation works and closure report shall all be carried out by contractor(s) approved in writing by the Local Planning Authority.

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

17: No development shall commence until the following documents have been submitted to and approved in writing by the Local Planning Authority after consultation with Sport England:

- (i) A detailed assessment of ground conditions (including drainage and topography) of the land proposed for the playing field which identifies constraints which could affect playing field quality; and
- (ii) Based on the results of the assessment to be carried out pursuant to (i) above, a detailed scheme which ensures that the playing field will be provided to an acceptable quality. The scheme shall include a written specification of soils structure, proposed drainage, cultivation and other operations associated with grass and sports turf establishment and a programme of implementation.
- (iii) The approved scheme shall be carried out in full and in accordance with a timeframe agreed with the Local Planning Authority after consultation with Sport England. The land shall thereafter be maintained in accordance with the scheme and made available for playing field use in accordance with the scheme.

Reason: To ensure the provision of quality playing fields

18: Details of all aspects of the external lighting, including technical details, impact on nearby residential properties and mitigation measures, shall be submitted to and approved by the LPA prior to the commencement of development and the development shall be carried out in accordance with the approved scheme and permanently retained thereafter

Reason: To protect the amenity of occupants of nearby residential properties in accordance with Policy BE1 of the Unitary Development Plan

19: With the exception of the details of the acoustic boundary fencing, the recommendations of the Cole Jarman report (Report 15/0467/R2 June 2016) shall be implemented in full prior to the use commencing and permanently maintained thereafter.

Reason: In the interest of protecting neighbouring residential amenity in line with policy BE1 of the Unitary Development Plan.

20: The development permitted shall be carried out in accordance with the Flood Risk Assessment (FRA) titled 'Eden Park Secondary School, Balmoral Avenue, Beckenham Floor Risk Assessment, Version 2.0' dated 8 November 2016 and the following mitigation measures detailed within the FRA: Finished floor levels will be site no lower than 37.66m AOD or 150mm above the existing ground level, whichever is greater.

Reason: To accord with Policy 5.12 of the London Plan and to reduce the risk of flooding to the proposed development and future occupants.

21: Details of measures to implement the recommendations of the Phase 1 Extended Habitat Report and the Bat Survey Report shall be submitted to and approved by the local planning authority and implemented prior to the first use of the development. The development shall be carried out in accordance with the approved details and permanently retained thereafter.

Reason: To comply with Policy NE3 of the Unitary Development Plan in order to safeguard and improve the provision for biodiversity on the site.

22: No part of the approved use of the site shall 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 outdoor sports pitches; MUGA and sports hall and include details of pricing policy, hours of use, access by non-educational establishment users, management responsibilities and a mechanism for review. 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/facilities, to consider the impact on amenity of local residents, to ensure sufficient benefit to the development of sport and to accord with Development Plan Policy.

23: Details of a scheme for the management of the car park shall be submitted to and approved in writing by the Local Planning Authority before any part of the development is first occupied and the car park shall be operated in accordance with the approved scheme at all times unless previously agreed in writing by the Authority. The content to be included in the Car Park Management Plan shall be agreed with the Local Planning Authority prior to submission of the draft Plan.

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

24: Before commencement of the use of the land or building hereby permitted car parking spaces and internal turning space shall be completed in accordance with the approved details and thereafter shall be kept available for such use and all spaces shall be 4.8m by 2.4m with a 6m rear clearance for each space with the exception of disabled spaces. No permitted development whether permitted by the Town and Country Planning (General Permitted Development Order 1995 (or any Order amending, revoking and re-enacting

this Order) or not shall be carried out on the land indicated or in such a position as to preclude vehicular access to the said land.

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

25: Details of electric vehicle charging points in accordance with the requirements of the London Plan shall be submitted and approved by the Local Planning Authority and implemented prior to the first use of the development and shall be permanently retained thereafter.

Reason: To minimise the effect of the development on local air quality in line with NPPF p124 and Policies 6.13 and 7.14 of the London Plan

26: The Sports Hall shall be erected in accordance with the footprint of the building shown on plan 110 Rev P3, in consultation with Sport England, and fitted out in accordance with the Sport England's Technical Design Guidance Notes: Developing the Right Sports Hall.

Reason: To ensure the development is fit for purpose and sustainable and to accord with Development Plan Policy

27: The Multi Use Games Area hereby permitted shall not be constructed other than substantially in accordance with Sport England's Technical Design Guidance Notes: Artificial Surfaces for Outdoor Sport (Updated guidance for 2013)

Reason: To ensure the development is fit for purpose and sustainable and to accord with Development Plan Policy

28: Details of EVCP to be provided in accordance with the requirements of the London Plan shall be submitted and approved by the Local Planning Authority and implemented prior to the first use of the site for education purposes and retained.

Reason: To accord with Policy 6.13 of the London Plan and in the interests of improving air quality.

29: The community use of the Sports Hall, dance studio and the Multi Use Games Area only shall not commence

- before 18.00 and the site shall be cleared of all users no later than 21.30pm on weekdays and
- before 09.00 and the site shall be cleared of all users no later than 16.30 on Saturdays and Sundays.

There shall be no community use of the football pitch, the training pitches and summer sports layout without the prior approval of the Local Planning Authority.

Reason: In the interests of the amenities of the occupants of nearby residential properties and the highway network to accord with the provision of Policy BE1 and T18 of the Unitary Development Plan.

30: The floodlighting for the Multi Use Games Area hereby approved shall not operate after 21.00 on weekdays or 16.00 on Saturday or Sunday. The floodlighting for the Football pitch shall not operate after 18.30 on weekdays and shall only be available for Eden Park High School related activities. Reason: In the interests of the amenities of the occupants of nearby residential properties and to accord with the provision of Policy BE 1 of the Unitary Development Plan

31: The development shall be implemented in accordance with the Tree Survey and Tree Protection Plan approved as part of the planning application, under the supervision of a retained arboricultural specialist in order to ensure that the correct materials and techniques are employed.

Reason: To ensure that works are carried out according to good arboricultural practice and in the interests of the health and amenity of the trees to be retained around the perimeter of the site and to comply with Policy NE7 of the Unitary Development Plan.

32: None of the trees shown for retention shall be removed, felled, lopped or topped within a period of five years from the date of this permission without the prior approval of the Local Planning Authority. Any trees or plants which within a period of five years from the substantial completion of the development die, are removed or become seriously damaged or diseased shall be replaced within the next planting season with others of similar size and species to those originally planted.

Reason: In order to comply with Policy BE1 of the Unitary Development Plan and to secure a visually satisfactory setting for the development.

33: Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (or any Order amending, revoking and re-enacting this Order) no buildings or extensions shall be constructed within the school site hereby permitted without the prior approval in writing of the Local Planning Authority.

Reason: In order to prevent intensification of the site and to comply with Policy BE1 of the Unitary Development Plan and in the interest of amenity and public safety.

Informatives:

01: You are advised that this application may be liable for the payment of the Mayoral Community Infrastructure Levy under the Community Infrastructure Levy Regulations (2010) and the Planning Act 2008. The London Borough of Bromley is the Collecting Authority for the Mayor and this Levy is payable on the commencement of development (defined in Part 2, para 7 of the Community Infrastructure Levy Regulations (2010)). It is the responsibility of the owner and/or person(s) who have a material interest in the relevant land to pay the Levy (defined in Part2, para 4(2) of the Community Infrastructure Levy Regulations (2010)

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

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

02: You should consult Street Naming and Numbering/Address Management at the Civic Centre on 020 8313 4742, email address.management@bromley.gov.uk regarding Street Naming and Numbering.

03: We would recommend floor resilience measures to be incorporated within the development to minimise the impact of flooding to the development. The EA fully support the inclusion of flood resilience techniques. Information on flood resilience can be found on the following link http://www.planningportal.gov.uk/uploads/br/flood_performance.pdf

04: The EA would recommend that occupant register with the Environment Agency's flood warning service, Floodline, so that they may prepare themselves in case of a flood event. This can be done by calling 0345 988 1188 to register.

05: Written schemes of investigation will need to be prepared and implemented by a suitably qualified archaeological practice in accordance with Historic England Greater London Archaeology guidelines. They must be approved by the planning authority before any on-site development related activity occurs.

06: You should contact extension 4621 (020 8313 4621 direct line) at the Environmental Services Department at the Civic Centre with regard to the laying out of the crossover(s) and/or reinstatement of the existing crossover(s) as footway. A fee is payable for the estimate for the work which is refundable when the crossover (or other work) is carried out. A form to apply for an estimate for the work can be obtained by telephoning the Highways Customer Services Desk on the above number. Any repositioning, alteration and/or adjustment to street furniture or Statutory Undertaker's apparatus, considered necessary and practical to help with the forming/modification of vehicular crossover hereby permitted, shall be undertaken at the cost of the applicant.

07: 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. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0800 009 3921

08: Thames Water recommends that all petrol/oil interceptor be fitted to all car parking/washing/repair facilities. Failure to enforce the effective use of petrol/oil interceptors could result in oil-polluted discharges entering local watercourses. Thames Water aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9litres/minute at the point where it leaves Thames Water pipes. The developer shall take account of this minimum pressure aim the design of the proposed development.

09: There is a Thames Water 8" cast iron distribution main crossing the development site directly adjacent to Balmoral Avenue. The main must be located and protected during construction. Unrestricted access must be available at all times for maintenance and repair. Please contact Thames Water Developer Services, Contact Centre on 0800 009 3921 for further information.