

## **SECTION '2' – Applications meriting special consideration**

**Application No :** 17/01652/FULL1

**Ward:**  
**Kelsey And Eden Park**

**Address :** Langley Park School For Girls  
Hawksbrook Lane Beckenham BR3 3BE

**OS Grid Ref:** E: 537998 N: 167337

**Applicant :** Mr Chris Goodwill

**Objections :** YES

### **Description of Development:**

Construction of two storey (approx. 8.2m max height) building for use as a primary school (Use Class D1) with landscaping, sports facilities, parking, bin storage, boundary treatment and associated highways works at Land adjacent Langley Park Sports and Social Club, Hawksbrook Lane, Beckenham, BR3 3SR.

Key designations:

Biggin Hill Safeguarding Area  
London City Airport Safeguarding  
Metropolitan Open Land  
Sites of Interest for Nat. Conservation  
Smoke Control SCA 9  
Smoke Control SCA 21

### **Proposal**

- The proposed development comprises a new build primary school with a floor area of approximately 2,300m<sup>2</sup> arranged over two storeys;
- Langley Park Primary School is currently located at a temporary site at the Hawes Down Centre on Hawes Lane within West Wickham;
- The temporary school site currently provides a single year group which was enrolled in September 2016 and currently has 46 pupils and 8 staff members attending the site;
- The proposed new school will provide for two forms of entry to accommodate up to 420 pupils and 30 full time staff once it reaches full capacity in 2022;
- The school day will run from 08:35 until 15:00 with the school site opening from 07:00 and closing at 18:00;
- there is currently no provision for a breakfast or after school club;
- The proposed school will be located on the existing hard surface tennis courts;
- Access to the school is from Hawksbrook Lane facilitated by separate vehicular and pedestrian entrances;
- The site will provide on-site vehicle parking for both staff and visitors with a dedicated drop-off and pick-up point to the north of the site facilitated through the widening of Hawksbrook Lane;

- A proposed circulatory within the site will allow vehicles to enter drop-off / pick-up and exit in a continuous movement;
- A total of 23 car parking spaces are proposed, which includes 18 staff car parking spaces secured by a barrier and key card, 3 visitor spaces and 2 blue badge spaces;
- Parking is to be located to the west of the school building with a dedicated footway provided between the areas for pedestrian access to and from the school;
- Covered cycle parking is also proposed and includes a total of 62 spaces to be used by staff, visitors and pupils.
- Landscaping, playspace and soft landscaping are proposed as well as tree planting at the southern end of the site;
- Directly outside the main building to the south is the designated Reception play area, further to the east is an area of hard play which is divided into two courts, further east is a large grassed play area and within the boundary of the site to the south are the relocated multi-use games (MUGA) courts;
- On the eastern most boundary of the site is located an area of meadow planting habitat zone and green field which acts as the soft play area.

#### Air Quality Assessment by Aether (Feb 2017)

Concludes mitigation is not required but encourages the school to minimise car use by both staff and pupils by encouraging cycling and car share schemes. Guidance on the assessment of dust from demolition and construction in order to minimise the impact of the construction phase on local air quality should also be adhered to.

#### Arboricultural Impact Assessment by geosphere environmental ltd (Aug 2017)

Within the current proposal it is unavoidable to remove T11, T12, and T14 which are Category B and C trees. In order to retain the trees throughout the development, the entrance and car parking will require redesign to incorporate the trees within the landscaping. If the trees are retained, any proposed surfaces surrounding the tree will have to be designed to be permeable and constructed using a no-dig methodology. Services should be designed to avoid any excavations within the root protection area of these trees.

The landscaping scheme, as proposed, would allow for the retention of the significant Oak tree at the front of the site within the scheme design.

The staff car park area should be designed such that the car parking bays are constructed with permeable surface using a no-dig methodology. Any proposed drainage in this area should be located outside of the root protection areas of trees, such as between the access road and the proposed building.

The construction of the surface water overflow drain will require on-site arboricultural supervision to plot out the route of the drainage pipe to minimise impact on trees within G5. Excavations for this pipe will have to be undertaken by hand to ensure there is minimal damage to tree roots.

A Tree Protection Plan is submitted which illustrates these details. The report also finds that there is potential to provide mitigation planting for any trees lost within the proposed landscaping and recommends mitigation tree planting.

#### Archaeological Desk-Based Assessment by CGMS (July 2017)

The site has been assessed to establish the significance of any archaeological assets on the site and any below-ground archaeological potential. No designated archaeological assets occur on the site or particularly nearby and the report states that none will be impacted by the proposed development. Furthermore the site is not within an archaeological priority area.

Evidence recorded within the surrounding 1.5km radius study area suggests a low or negligible archaeological potential for Prehistoric, Anglo-Saxon, Medieval and Post-Medieval evidence. Previous archaeological interventions to the north of the study site recorded no significant archaeological remains and no anomalies of potential archaeological interest were identified during a review of LiDAR data and Aerial Photographic evidence. A moderate archaeological potential for Roman roadside evidence is considered in the southeast of the site and the potential for landscape features associated with the former Langley Park, a non-designated asset of local significance.

The report asserts that the construction of tennis courts in the west of the site, the building in the north-east of the site and tree planting is likely to have had a severe and widespread damaging impact on any sub-surface archaeological remains. However, it concludes that, based on the information available and extent of past ground disturbance, the proposed development does have the potential to impact archaeological remains of local significance and mitigation measures secured by an appropriately worded condition following planning permission are recommended.

#### Written Scheme of Investigation (WSI) for an Archaeological Monitoring Exercise by Pre-Construct Archaeology Ltd (August 2017)

This sets out an archaeological watching brief programme comprising monitoring of all intrusive groundworks and the method for recording and storing any archaeological features. The WSI is subject to approval by Historic England.

#### Community Use Statement of Intent (12/07/17)

The community use agreement offers the use of the hall (175sq m), 5 games courts (belonging to Langley Park School for Girls) and grassed area weekdays between 18:00 to 21:00 during term time and 08:00 to 18:00 during the school holidays. At weekends the hours will be Saturday from 09:00 to 18:00 and Sunday from 10:00 to 16:00.

#### Drainage Comments by BWB (30/05/17)

The applicant has responded to the council's Drainage Officer's comments regarding the need for green roofs and permeable paving. They state that the

reasons for omitting these are that they are not needed from a flood and pollution reduction point of view to comply with London Plan policy. The development will incorporate attenuation tanks which will provide enough attenuation for the 1 in 100-year storm event + 30% climate change, therefore additional attenuation is not required and green roof/permeable paving will not be needed from a flood reduction point of view.

The applicant goes on to say that regardless of the above, the design team recognise the benefits of using a green roof but unfortunately it has a number of short comings for this scheme which are not just financial, including structural implications; an increase in building height and an increase in foundation depth.

Furthermore, they state that the surface water from the site should be of good quality and is unlikely to lead to pollution therefore green roofs/permeable paving is not required from this point of view.

#### Drainage Specification (July 2017)

In response to the comments made by the Council's Drainage Officer, the applicant has submitted a revised Drainage Specification and drainage plans which now include permeable paving to the east of the site in the location of the staff car park.

#### Energy Statement by Bowmar & Kirkland (July 2017)

This states that the new school has been designed in line with the London Plan Energy hierarchy with a focus on a fabric-first energy strategy. The fabric first energy strategy, it says, has enabled the construction budget to be prioritised towards reducing the energy consumption for the building rather than focusing on renewable energy technologies. The school has been designed to meet the Education Funding Authority's Facilities Output Specification (FOS) which, they state, provides a significantly better internal environment compared to previous projects which would comply with the Building Bulletins.

The report concludes that the 35% reduction in carbon dioxide emissions can be met through energy efficiency measures and the incorporation of renewable technologies on site and proposes 129sq m of photovoltaic panels on the roof of the building. In total the energy efficiency measures will allow for a reduction of 35.2%% energy saving for the baseline Part L 2013 Building Regulations.

#### Environmental Noise Impact Assessment acoustic Consultancy Report 2305/ENIA by ADT (Nov 2015)

The assessment was undertaken prior to the building layout being finalised. A fully attenuated environmental noise survey has been undertaken to determine the currently prevailing daytime noise levels on the site and representative background noise levels for nearby noise sensitive areas. It finds that compliance with the BB93 indoor ambient noise levels should be achievable with standard forms of building envelope and natural ventilation. The westernmost part of the site is found to be affected by moderate existing school noise and it advises to consider the orientation of particularly sensitive rooms and possible alternative ventilation. New

building services plant is expected to be the only significant noise source however this has not been assessed due to none of the plant having been selected at this stage.

#### External Works Specification (July 2017)

This comprehensive document sets out the working hours and responsibilities of the external works contractor, stipulates to what regulations they should be working to in order to minimise dust and nuisance during construction and gives specifications for the laying of access road, pavements, car parking areas, etc.

#### Flood Risk Assessment by geosphere environmental ltd (Oct 2016)

The site is approximately 1.1 hectare (ha) in size and is not identified by the Environment Agency as being within a Flood Zone. The nearest flood zone (flood zone 2) is located approximately 115m east of the site and the site is therefore at low risk from fluvial flooding. The site was also assessed for groundwater flooding, surface water and sewer flooding. The Environment Agency Surface Water Flooding map indicates that there is a very low risk of surface water flooding across the majority of the site. However, there was an area of low-high risk, oriented east to west through the centre of the site. It is considered probable that this is due to runoff from the tennis courts which are to be re-located to the south west portion of the site. These areas will need to be investigated further as part of any detailed drainage design.

The report also assesses the surface water drainage and potential for SUDS at the site however, in the absence of proposed development plans at the time the report was written, it says that the proportion of soft-standing areas which would otherwise be used for infiltration of surface run-off (Greenfield) is unknown. It recommends surface water run-off mitigation measures should the proposed development result in impermeable area exceeding 30% of the sites area. Permeable surfaces and green roofs are recommended accordingly.

#### Ground Investigation Report by geosphere environmental ltd (October 2016)

The site was tested by way of infiltration testing, brief geotechnical appraisal and a schedule of ground gas monitoring. Elevated concentrations of hydrocarbons were found and it is likely that some areas of the site will require remediation. The report recommends that a Remediation Method Statement is produced so that relevant areas of the site requiring remediation may be identified and further assessed. Further soil sampling and analysis is also recommended and it is recommended that all flexible surfacing is separated from other soils and disposed of at a suitable facility.

Further recommendations are made in respect of gas monitoring and protection measures and piled foundations for which a full geotechnical assessment to detail design criteria for the use of piled foundations will be required.

#### Remediation Method Statement by geosphere environmental ltd (August 2017)

The purpose of this statement is to mitigate the identified risks to human health from the identified contaminants associated with the former bonfire site to the north west of the site. The report includes a remedial strategy, excavation programme and a method of reporting. It also outlines the health and safety practises which should be adhered to when the remediation works are being undertaken.

#### Heating Strategy by Bowmer & Kirkland (June 2017)

The heating strategy for the building is based on reducing heat loss from the building. The primary heat source supplying the heating requirements of the building will be a low pressure hot water (LPHW) system with the heat generated via gas fired high efficiency modular condensing boiler plant located within the main plantroom. A minimum of two gas fired modular boilers will be provided.

#### Preliminary Ecological Appraisal by Green Shoot Ecology (April 2016)

Bats - veteran trees were identified adjacent on the edge of the site within the golf course and close to the western site edge which are suitable for roosting bats. Bats may also use tree lines and woodland edges on the site boundary as foraging routes. It concludes that if it is not possible to avoid light reaching the surrounding possible bat habitats then further surveying for bat roosts and foraging routes should be undertaken to see if bats are using the boundary areas. From these results it says that recommendations can then be made.

Birds - medium risk of birds nesting in scrub or trees on the edges of site was found - it is recommended that these works take place outside of the main bird nesting season.

Great Crested Newts - the survey found medium probability of GCN being present on the site in low numbers. The survey found a school pond was present only around 10m from the development site and another possible pond around 100m away on the golf course. The nearest pond was found to have average suitability for GCNs. It proposes that a GCN survey be carried out on the school and golf course pond to see if they are present. It is likely that GCNs may cross the site at night and may be impacted by construction works. If they are found to be present it will be possible to erect newt fencing around the site and possibly apply for a license from Natural England.

Reptiles - medium probability of reptiles being present on the site was found. Should works require removal of the scrub along the eastern edges of the site it should be carried out in a way to minimise the risk to reptiles as described in the report.

With regard to the adjacent SINC it recommends that precautions should be taken to prevent damage to roots of trees adjoining, as well as to prevent surface water run-off mud, chemicals and similar into the stream running adjacent to the site a short distance from the boundary.

#### Ecological Working Method Statement by Geosphere Environmental Ltd (July 2017)

This has been prepared in response to the results of the preliminary ecological appraisal and comments from the case officer regarding outstanding issues in relation to Great Crested Newts (GCNs). A Habitat Suitability Index assessment was undertaken on the school pond which revealed average suitability to support GCNs. An assessment was not undertaken on the golf course pond. A further check of aerial mapping has identified a further waterbody within 46m of the golf course to the east. The recommendations in this report are consistent with the findings of the preliminary ecological appraisal which suggests there is low probability of GCNs being present on the development site but there is limited potential for GCNs to use the woodlands and connecting lines of trees for commuting purposes. Therefore appropriate working methods are recommended to avoid impacts on GCNs, if present, including temporary amphibian fencing to be placed along the boundaries of the construction zone to remain in place until the development is complete. A talk is also to be given to the contractors by a suitably qualified ecologist prior to groundworks and vegetation clearance commencing in order to advise on working procedures to minimise risk to GCNs.

#### Sequential Site Assessment by dpp planning (revised July 2017)

The assessment evaluates whether the prospective school could be located on an alternative site. Extensive site searches have been undertaken, using the Council's allocated sites as part of the UDP and draft local plan, local agent's websites and suggestions from Sport England. No sites were identified as available, suitable, deliverable or sequentially preferable. The assessment concludes that there is a clear and pressing need for schools in the area and that there are no less harmful sites available and that "very special circumstances" can be demonstrated in order to justify the use and development of this section of MOL for Langley Park Primary School

The addendum builds on the previous Sequential Site Assessment, responding to the request from the GLA to assess additional sites with the possibility of co-locating with other land uses, occupants or services. It reviews sites in and around the catchment area that have the potential to meet the site requirements of the school and avoid the need to build independently on MOL.

The applicant considers that the application site itself is already part of the Langley School for Girls complex and would be a co-location in itself in that it would share a location and sports facilities with the existing schools. Other sites assessed as part of the initial assessment are given further review in the context of co-location possibilities.

#### Transport Assessment by BWB (March 2017) (amended by Technical Addendum received 12/07/17)

This assesses the impact of the development on the local highway network from the initial intake year (2018) until the school reaches full capacity in 2022. The proposed catchment area is expected to be localised however the proposed development is still predicted to result in an increase in traffic each year until 2022 and is predicted to be concentrated around peak drop-off and pick-up times. It is

concluded that at full capacity the development will result in less than 400 vehicle movements along Hawksbrook Lane in either direction during any peak period which is below the forecast maximum saturation level even with 50% saturation taken up with on-street parking. It concludes that the increase in vehicular traffic would not be significantly detrimental to the operative capacity of Hawksbrook Lane.

In terms of mode share, for pupils it is estimated that when the school is at full capacity 50% of students will travel by car, whilst 41% will walk to school with the remaining cycling or using public transport. For staff 60% are expected to travel by car with the rest walking.

The Transport Assessment also sets out a parking management strategy for the school. On-site parking for both staff and pupil drop-off and pick-up trips is to be promoted from the outset of the school development with parking off-site strongly discouraged.

With the first phase of the school providing space for up to 180 pupils during the first year intake, parking and drop off demand will be significantly lower than that forecast when all 420 pupils are in attendance. This gradual expansion, the applicant says, will help to identify areas of concern before they become a problem and allow the school to react to specific habits or areas which are deemed to be problematic. It is therefore imperative that travel habits are directed from the outset to help retain sustainable practices as additional forms enrol.

The assessment asserts that the school are committed to observing and recording vehicle behaviour during the morning and afternoon arrival and departure periods to deter drivers from stopping on Hawksbrook Lane instead of the dedicated provision. Presence on Hawksbrook Lane will help to deter drivers whilst information on acceptable and unacceptable practices will be provided to all new pupils.

In addition to the off-site monitoring, on-site monitoring of the drop-off section of the car park will be undertaken. This space will be monitored by staff during the morning and afternoon arrival and departure times to enforce best practices and reduce dwell times to ensure maximum throughput of vehicles can be achieved.

It is envisaged that the measures set out within the Travel Plan will further reduce reliance on private car use for both pupils and staff which will continue to be monitored and implemented as the school capacity increases to its maximum.

The junction between Hawksbrook Lane and Upper Elmers End Road was reviewed in terms of capacity with regard to forecast traffic generations associated with the development. The results indicate that the junction is currently operating within capacity and remains so for the future year baseline assessment in 2022. The peak forecast queue are 8 vehicles during the AM peak and 7 vehicles during the PM peak which equates to a queue length of a maximum of 48m and it is considered that this level of queuing would have no detrimental impacts on Hawksbrook Lane.



A technical addendum was received on 12th July which indicates the applicant's intention to increase the number of staff car parking spaces from 15 to 18. The accessibility of these spaces has been assessed via a swept path analysis.

The applicant has also carried out a second round of sensitivity testing for the junction of Hawksbrook Lane with South Eden Park Road based on the updated assumption that 68% of students will travel by car to/from the site. The results indicate that in 2022 when the school is at full capacity the junction will be operating slightly above maximum capacity suggesting that the junction would be over capacity. Queue lengths are forecast to peak at 16 vehicles during the morning meaning a maximum queuing length of 96m which is close to the 100m distance from the junction to the first car park access point. This means that queuing may have a detrimental impact on Hawksbrook Lane.

The applicant asserts, however, that the impact of additional traffic on this junction can be managed effectively to ensure that the demand never reaches these levels by reducing car usage through the implementation of the Travel plan. Furthermore, it is proposed that annual monitoring be undertaken and that, should excess stress be observed consistently, measures to increase capacity be discussed.

#### Travel Plan by BWB (revised 12/07/17)

This has been prepared to support the planning application and proposes a number of measures to minimise traffic, discourage car use and encourage parents, pupils, staff and visitors to use alternative modes of transport to car based trips, such as walking, cycling and using public transport. These include:

- Management of site access;
- Management of car usage to ensure no unauthorised use of spaces;
- An 'anti-idling' campaign to increase awareness of unnecessary waiting of vehicles around the school;
- Active staff management of drop-off and pick-up routines on Hawksbrook Lane;
- School 'keep clear' road markings;
- Promotion of car sharing online and through mobile application;
- Promotion of taxi services;
- Distribution of pedestrian route map;
- Pedestrian safety education lessons and events;
- A 'Walk to School' month in October;
- Promotion of walking health benefits;
- Distribution of a cycle infrastructure map;
- Cycle parking for staff, visitors and pupils;
- Cycle locks and cycle storage equipment available on site;
- A reward scheme to encourage children to cycle to school;
- 'Cycle to work' schemes;
- Travel planning assistance for staff and guardians.

The revised travel plan makes specific reference to Transport for London's 'Sustainable Travel: Active Responsible Safe (STARS)' accreditation scheme

which it is anticipated will aid in reducing pollution, congestion and road accidents by encouraging young people to use public transport by offering an accreditation scheme for specific tasks and activities.

A Travel Plan Coordinator will also be appointed to take direct responsibility for the implementation and monitoring of the Travel plan. Continuous monitoring, review and refinement over time is anticipated since the TP is considered to be a live document that should be continuously updated.

### Visual Analysis by ares (July 2017)

The purpose of this document is to identify the predicted visual effects likely to result from the development of the school campus.

The Visual Analysis has been prepared according to the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) published by the Landscape Institute and the Institute of Environmental Management & Assessment (IEMA).

15 viewpoints were assessed to try and determine how significant the visual impacts from the proposal would be. This was done by measuring the scale or magnitude of the effect and the environmental sensitivity of the location or receptor.

The most significant change will be views looking towards the site from directly opposite the site on Hawksbrook Lane. The report finds that existing views into the site are filtered by the existing tree and fencing. Grass sports fields can be seen beyond the tennis courts with mature deciduous trees to the field boundary in the background. As a result of the development the proposed building will be prominent in the foreground with mid and long distance views partially interrupted by the building. However, it concludes that the building will sit in the context of its surroundings, will not be a congruous element and considers the significance of the effect will therefore be moderate.

Another of the views assessed was from the Langley Park sports ground looking north east across open parkland which allows clear unencumbered views of the site. Mature deciduous boundary trees end the view with the shape of the canopies seen clearly against the sky line. As a result of the proposed development the report finds that the western elevation of the building form will sit centrally in the middle distance and perimeter fencing of the existing all weather pitch will provide some diffusion of the view. However, it considers that the building form will not penetrate the skyline formed by the boundary trees along Hawksbrook lane and it will therefore be in keeping with the surrounding built form. It finds the significance of the effect to be minor.

Of the other views which were assessed the report finds none to be significantly effected as a result of the proposed development.

The application was also accompanied by a Planning Statement and a Design and Access statement in which the following points were submitted in support of the application (summary):

## Planning Statement:

- In terms of community engagement pre-application meetings were held with the GLA, Officers from the London Borough of Bromley and Langley Park Residents Association; Sport England were consulted and a public exhibition was held;
- In terms of the principle of development the need for new school is acute across London and the position from Central Government creates a strong 'in-principle' support for new state education facilities;
- The quantitative need for a new primary school in the area is outlined in the Borough's Primary School Development Plan (2015) and Bromley's Education Background Paper (2016);
- As a result of the Council's needs assessment, the draft Local Plan makes provision for several new schools in the Borough and the site has been allocated for development for the school under Draft Policy 29;
- In terms of the site's MOL designation the development would be an apparent departure from current planning policy as the erection of a new school is not considered a suitable form of development on MOL;
- Therefore 'very special circumstances' would be required and a robust needs case and Sequential Site Assessment is required to demonstrate such circumstances;
- The Sequential Site Assessment evaluates sites in and surrounding the catchment area and considers suitable sites for new schools, including the re-use of existing buildings, the development and expansion of existing schools, the redevelopment of brownfield sites and the development on greenfield land such as MOL and other open space;
- This exercise concludes that the site as Hawksbrook Lane is the sequentially preferable location for a new primary school to serve this area of Bromley;
- The above combination of both a clear and evidential need for primary school places in the area and the lack of suitable alternative sites provides clear and robust 'very special circumstances' for the development of a new school on MOL;
- The proposal seeks to minimise the loss of playing fields by promoting a compact school layout and compensatory provision of new and improved sports pitches and other facilities;
- While it would be desirable to supply a MUGA as part of the proposals two hard court ball areas are included which can be used not only as sports facilities but also as playspace areas for children during break times;
- The absence of a MUGA also allows for the retention of the sports field to the east of the site;
- A large part of the site will also continue to be made available for wider community use to be covered by a Community Use Agreement between the applicant's and Bromley Council;
- Whilst it is acknowledged that there is a loss of playing fields this should be viewed alongside the qualitative improvements, including community use, the opportunity of more intensive use of the facilities and the backdrop in needing to provide a new school in the catchment area;

- In terms of design the siting and layout of the proposal has been determined by a number of constraints and site requirements including minimising the land take of MOL, maximising the area of land for sport and open space, minimising the impact on mature trees, the provision of parking required and the need to provide associated facilities and playspace;
- It concludes that the new school will have limited impact on the character and appearance of the area;
- The Transport Assessment submitted with the application demonstrates that Hawksbrook Lane and the junction with South Eden Park Road are capable of accommodating the new school traffic and sufficient car parking for staff and visitors is included as well as a large 'drop off bay' for parents;
- A Travel Plan is also provided to encourage the use of more sustainable modes of transport;
- The new school will meet the London Plan's policy of reducing CO2 emissions by 37.5% against the Part L targets and includes measures such as the provision of photovoltaic panels on the roof of the building;
- In terms of air quality it will not have a discernible impact on the Borough's designated Air Quality Management Area;
- The site is not susceptible to flood risk and there are no notable species of wildlife;
- While there will be the loss of 2 trees the proposals include the planting of 7 trees to compensate and a category A tree to the front of the site will be retained;
- It is concluded that the proposals confirm to the NPPF, Central Government policy, London plan and Bromley Local Policies and as such there is a presumption in favour of sustainable development and planning permission should be granted without delay.

Design and Access Statement:

- Given the surrounding context and concentrating the development of the school to the northern edge of the site, positioning the gable ends of the building to the north and south, the potential for the school to overlook any nearby residential properties is very unlikely;
- The design ensures that the building would minimise potential impact in terms of amenity and daylight issues to adjacent buildings as well as releasing a large amount of outdoor play space to its East and South on completion of the build;
- It also, importantly, gives help give the building presence and visibility for the users on Hawksbrook Lane;
- The orientation of the building on a north-south axis ensures that classrooms can acquire optimum levels of daylight required for teaching without over-lighting;
- The main entrance retains good proximity to the highway for visual clarity and path finding;
- Allows for the retention of mature trees to the North of the site;
- The areas within the building that had the potential for dual-use as community spaces, out of normal school hours, are located in proximity to Hawksbrook Lane;
- This encourages an active frontage during the day and into the evening;

- The main entrance of the building is located on the west elevation, marked out by a glazed entrance canopy which assists visitors with wayfinding;
- The location and massing strategy also addresses the potential for loss of light/overshadowing to the school building from the tall trees which line the eastern boundary of the site - to address the shading issue as well as protecting the trees the building has been set back away from the eastern boundary;
- Hawksbrook Lane is a tree-lined open lane and there are no buildings built directly to its boundary;
- The perceived impact of the new building on the street scene on Hawksbrook Lane has been minimised through careful treatment of the building elevation to avoid a perceived sense of enclosure along the street;
- The building is set back from the street with the narrow gable end directly addressing the street;
- The main hall also steps down in height from the school block to further reduce potential impact on the street scene;
- The building will also be masked by the existing all weather pitch and by retaining much of the existing hedging and careful placement of new proposed trees;
- A darker colour render helps to ground the building to the site whilst the upper storeys are finished in a lighter coloured render to allow the façade to dissipate towards the sky above;
- This contrast, when combined with the "layering " of built elements towards the highway such as the proposed fencing lines and the existing and proposed trees, allows the building to be observed as lesser than two storeys nearest the lane;
- In terms of design and materials vertically orientated windows flood light into classrooms and create an attractive rhythm to the horizontal form;
- Feature areas of the elevation are created by the introduction of a timber and a secondary render colour;
- The robust brick plinth and proposed render finishes give identity to teaching areas as well as help reduce the mass of the elevation;
- The combination of materials used has been chosen to give the building a hierarchy of spaces and aims to address the siting of the building within the landscape;
- Brick and render have been chosen as they are the most prevalent materials in the surrounding area;
- A security strategy has been developed meeting the requirements of the EFA and the school;
- All external areas provided are for designated formal and informal social use by pupils throughout the school day;
- The layout of the building has been organised to allow specific areas to be used by the wider community out of school hours;
- The new school building will provide an inclusive access, affording level access to both new and existing parts of the site;
- All internal and external areas will be designed to meet the latest Building Regulations - Part 'M', the Equality Act 2010 and BS 8300.

On 12th July 2017 a supporting letter was received from the applicant in response to the matters raised by the GLA. This can be summarised as follows:

### *Land Use*

- Notwithstanding that the site is technically a co-location by way of being located on an existing educational campus, an additional examination of the surrounding catchment area and beyond has been made and no other potential sites have been identified that could incorporate a school as part of the overall delivery of residential, commercial or mixed use development;
- The attached Sequential site Assessment confirms this and, again, reiterates that the contextual need for a new primary school in the area and the lack of suitably available sites clearly demonstrates 'very special circumstances' for the development on MOL and creates a robust reason for approval;

### *Loss of Playing Fields*

- It is acknowledged that the proposal is located on existing tennis/netball courts and would encroach onto playing fields and may limit the extent to which the playing fields can be used for certain sports;
- The re-provision of these facilities in the south of the site has been proposed, in addition to the hard games courts that are provided as part of the new primary school;
- The tennis courts are located so as to allow the western portion of the playing fields to be utilised as a football field, cricket and athletics pitch by readjusting the boundary of the respective sports activity;
- The further site at St Dunstan's Lane has been investigated but has been considered undeliverable for a number of reasons as highlighted in the Sequential Site Assessment;
- The site is not currently available for purchase, is designated MOL and would require extensive works including the upgrading of a narrow lane to allow two way vehicular access;
- The site is also currently used as playing fields;
- Sport England has not taken all of this into account;
- The loss of playing fields is considered to be modest in an area of extensive sports provision and a considerate approach needs to be taken with regards to the provision of new education facilities to meet the acknowledged need;
- To further offset the loss the development would enhance sports facilities so that they can be used all year round and would be available for community use;

### *Community Use*

- It is proposed that the school will enter into a Community Use Agreement to allow the facilities to be utilised by members of the public (see above statement of intent);

### *Urban and Inclusive Design:*

- Details of the proposed materials have been submitted with the planning application;
- A materials palette is being prepared for submission to the Council for further inspection and the details of the cladding system to be installed have been forwarded as part of this submission;
- The design of the building meets the specifications as set out in the London Plan Policy 7.2 inclusive Design;

### *Sustainable Development*

- The revised report concludes that the 35% reduction in CO2 emissions can be met through energy efficiency measures and the incorporation of renewable technologies on-site;
- In total the provisions made will allow for a total reduction of 35.2% energy saving for the baseline Part L 2013 Building Regulations;
- If due credit were to be given to all energy efficiency measures and not just those captured by the BRUKL model the saving would be much higher;
- Nevertheless the proposal is now considered compliant with London Plan policy 5.2;

### *Transport*

- Shower and changing facilities will be provided in the 'Hygiene Room' as shown on the plans - the details will be submitted to the Council shortly;
- With regards to parking, it is acknowledged that TfL require a reduction in car parking on site to reflect the overall strategic aim of reducing car dependency and encouraging public transport;
- However given that the site is rated as PTAL 1b it is important that the school remains functional for both staff and students;
- Bromley Highways have requested a further three spaces to take the total number to 23;
- The revised plans (showing three additional spaces) will be submitted to the Council shortly'.

### **Location**

- The application site measures approx. 1.5 hectares and is roughly L-shaped and comprises tennis courts and playing field;
- The site is located on the southern side of Hawksbrook Lane, opposite the existing Langley Park School for Girls and is accessed via a pedestrian access gate off of Hawksbrook Lane;
- The whole site is designated Metropolitan Open Land (MOL);
- Bordering the site to the east is Langley Park Golf Course with dense tree planting abutting the site boundary;
- This adjacent site is designated as a Site of Importance for Nature Conservation (SINC);
- The west of the site is bordered by a MUGA which is co-operated by Bromley and Beckenham Hockey Club co-operate and Langley Park School for Girls and there is also a small car park;
- To the south of the site is playing field which is also designated as MOL;
- The site has a Public Transport Accessibility Level (PTAL) rating of 1b (on a scale of 0 - 6 where 6 is the highest);
- Hawksbrook Lane is a single carriageway which connects to, and is located to the east of the B230 South Eden Park Road;
- It is a dead end road and provides access to Langley Park Schools, which include Langley Park School for girls, Langley Park School for boys and Langley Park sports & Social Club;
- It also stretches from the east off Wickham Way, however does not allow for vehicular access to Langley Park Schools, instead, a footpath is provided for pedestrians and cyclists;

- The nearest section of the Transport for London Road Network (TLRN) is the A232, over 1km to the south;
- One bus route is available from Wickham Way, 500m from the site and West Wickham Station is also located approximately 1km to the south east of the site.

## Consultations

Nearby owners/occupiers were notified of the development in writing, a site notice was posted and a press advert was published. Representations were received in support of and in objection to the proposal which are summarised below.

### Objection:

- The lack of parking space at the Girl's school already causes problems of parking in the area and on private land in the area: If this scheme is to go ahead what will be done to stop this nuisance?
- the volume of traffic in a narrow road (St. Dunstan's Lane and Hawksbrook Lane) when pupils are coming and going is too high for safety;
- parents will drive up Hawksbrook Lane to enter drop-off point, thus dramatically increasing traffic flow up the lane and surrounding roads at already busy times
- have witnessed aggressive driving on numerous occasions where cars are trying to get in and out of Hawksbrook Lane at the busy junction of South Eden Park Road without the extra pressure of the Primary School traffic;
- you should take into account other current applications affecting South Eden Park Road because of the likely effects of traffic and air pollution: Langley Court - formerly part of Glaxo Wellcome was given permission for 258 units but the new owners are now submitting a plan for a higher density, namely 280 units and a 100 bed care home and land opposite Chinese Garage where a proposal for about 120 units has recently been turned down - these applications (and any others which might be proceeding) should be looked at as a whole;
- the new school should not be allowed on Metropolitan Open Land;
- object to any use of playing fields for the new school site;
- Bromley has provided new and expanded schools in this immediate area;
- there should be no new building, existing sites should be used;
- do not believe that forecasts of pupil numbers should be relied upon without much more rigorous testing;
- doubt whether parents of such school age children will be able to buy or rent property near the new school;
- any assumptions that people will walk or take public transport to this new school should be based on what happens now;
- Cars are parked all day by commuters and others, some are parked on the double and single yellow lines; there is hardly any enforcement of parking restrictions although wardens patrol the station from time to time;
- this holds up buses, ambulances and police cars as well as the ever increasing number of very large lorries;
- occasionally we get gridlock near the Unicorn school where parents dropping off or picking up brazenly park in the main road restricting traffic flow to one lane and significant queues build up;



- the Chinese roundabout is becoming ever more dangerous at existing levels of housing traffic and schools;
- there could be a major health and safety issue if there were a need to get emergency vehicles for example to the girls' school between 1500 and 1530;
- there is the additional problem of air pollution;
- carers and parents often stay in their cars with the engines on whilst waiting for pupils to emerge;
- do not want the additional health risk of even poorer air and it is bad for the community as a whole;
- note from the report by RSK which the council has already received in relation to Langley Court that air pollution already exceeds recommended levels;
- a new site should be mandated;
- believe this application should be rejected completely;
- please confirm that there will be no abuse of the planning process in the light of the public statements about the new primary school going ahead;
- Loss of existing sports facilities for current students of LPGS;
- although the plan is to relocate the netball/tennis courts, this will mean a huge reduction in the playing field, which is scarcely adequate for such a large school;
- as the application states, the immediate need for places is not in the most local area & therefore many children will need to travel & this by car;
- the proposed drop-off zone may be used by some parents in the mornings, although they will have to battle the traffic to reach it, but in the afternoon parents will park to collect their children & where will they park?
- it is also completely unrealistic to expect staff to walk to school with their equipment & work to carry each day - they will want to drive & where will the other 15 park?;
- this is a short-term fix to the problem of building the new school but it is in the wrong position;
- the Council need to take the long-term view & think more imaginatively about what is right for the whole community, rather than taking the easy option to pass this application;
- an alternative site needs to be found, possibly by re-developing some residential property on the Park Langley estate;
- some properties have huge frontages & there may be scope for infilling;
- clearly this development should be subject to a proper EIA review - have just seen the letter saying no review is necessary - this is an abuse of the planning process to arrive at a result which has been predetermined;
- Park Langley is a conservation area, renowned for its green spaces & tranquillity; that is increasingly under threat;
- the additional information received looks at the advantages of co-location but fails totally to consider the disadvantages in relation to this site;
- a third school built down a narrow lane is like a high-rise without a fire escape;
- the report fails to deal with the safety issues in case of fire or other emergency;
- the damage caused in St. Dunstan's Lane has already caused the road surface to deteriorate markedly and thus far the council seem reluctant to maintain or repair it;
- hope that Councillors will visit the site before deciding on this plan - they will see that an additional 400 children, all of them having to be brought by a parent or carer, probably by car, is not a good idea for such an already congested site;

- it is claimed that no other suitable site can be found for this school, I wondered about the large field adjacent to Wickham Way at the other end of the lane which appears to belong to the boys school is little used and would give direct access without having to use Hawksbrook Lane;
- would like to know what will be done to reduce traffic at peak times at the entrance to the schools and what will be done to ensure access to residential streets isn't hampered by inconsiderate short term parking;
- there is no shortage of primary school in the local area, there are no very special circumstances;
- the school will be drawing its pupils from a wide catchment area and therefore a large proportion will be relying on public transport and cars;
- all the buses are overcrowded with pupils attending the Langley Park School for boys and Girls;
- the new school would result in a doubling of the existing number of traffic movements at the junction of Hawksbrook Lane with South Eden Park Road and further overload the existing local public transport system;
- the planned provision within the proposed development for cars arriving with or to collect children appears totally inadequate;
- it is unrealistic to assume parents will be prepared to leave their children and drive away without escorting them to the pupil entrance;
- similarly in the afternoon parents will arrive early and wait for 200-300 children to leave the building and there will be a backup of parked cars exacerbating traffic management problems in Hawksbrook lane;
- there is a new primary school, Unicorn, 400 yards from here, Oak Lodge is a 10 min walk and the newly expanded Clare House is just over 1 mile;
- there is no shortage of primary schools in this geographic area;
- there are therefore no very special circumstances;
- the GLA should come and look;
- The Langley secondary schools appear to begin at 8.30 am, and it is very busy outside our house then - could the Primary school begin at 9.00 to allow the first lot of traffic to clear?
- similarly the Boys school ends at 3.00 pm and the Girls at 3.10, so maybe the little ones could end at 3.30 or 3.45, again to allow the traffic to calm down;
- think it is wrong that schools are allowed to set up, recruit pupils and start operating before they have the premises to do so;
- this primary school has been up and running in West Wickham for a couple of years - it really shows that the whole idea of applying for planning etc is really fake as they somehow know that they will get the go-ahead;
- it is very annoying for local residents, as they feel that any issues they may have will be neatly ignored and the go-ahead given;
- this Primary school is being squeezed into an already crowded area, and the resulting traffic will be difficult to cope with;
- the Girls school is losing sports facilities, which is wrong in this day and age.

Support:

- This is a fantastic opportunity for the children in the local area of Beckenham, and allows a primary school to be established in an appropriate area where it can benefit from current facilities of the secondary schools whilst also providing a much needed additional primary in the area;

- there is no doubt that this will become a progressive, fun, caring and educational place for our younger children to grow, develop and hopefully progress into the Langley secondary schools;
- the staff (at the temporary site) are amazing and know how to ensure each child develops and enjoys every lesson;
- this school will be a 10 minute walk when the new site is complete, at present we must drive each day to the temporary site;
- there is a massive demand for additional school places in the area;
- the temporary school site is now getting to capacity and the need for this new building is becoming more and more critical;
- wholeheartedly support this application;
- the children at Langley Park Primary need a permanent location that they can call home for the coming years;
- they are currently in temporary accommodation which they will grow out of within a few years;
- the proposed location on the Langley Park site is ideal, as it will provide the strong backup and infrastructure that a new school needs;
- with such close links to the Langley secondary schools, the children will benefit from more seamless progress through the stages of their education;
- many of our neighbours welcome this new school as they don't want their child's class size to increase;
- after almost one year at the temporary site I think it is vital that quick progress is made to establish a permanent school building and this should be in place for summer 2018;
- if this new building isn't permitted to go ahead then I would be very concerned for the educational development of my son;
- in addition there will be a significant traffic problem on Links Way road if the temporary site continues to expand into a third intake in summer 2018;
- can only serve to increase house prices and area success;
- there are many local residents with young children in park Langley that would benefit from being able to walk to this school;
- they offer play based learning opportunities within the early years foundation stage and have a real understanding of the importance and benefits of offering a rounded holistic curriculum which I feel is sadly lacking in many of the local schools;
- it would be hugely detrimental to many children if this did not get approved;
- the immediate area is characterised by family homes, as opposed to flats and commercial property, and as such, many families move into the area to bring up their children. There is therefore a need to cater for these families in the vicinity;
- the proposed site has been well thought out and should keep the congestion during both the building process and when the school is up and running to a minimum;
- the school is definitely attracting the interests of other parents as confirmed by the number of applications for next school year in September 2017;
- the decision to open LPPS was a good decision and everyone will benefit from it, the pupils will be distributed more evenly at the new school and this could also create a healthy competition between them, more families will move into the area, more shops and business will open and the local community will grow;
- the application to build a permanent should not be delayed any longer;

- the planning committee and the school have and are taken on board the concerns of the local residents and I know will make provisions to minimise any disruption for the future;
- would ask you to approve this proposal with no further delay so that our children have the high quality permanent facilities and the high standard of education which was promised to parents and the community by approving the opening of the school;
- Langley Park Primary School is already set up and has achieved a very high standard of education for its pupils, it is now in need for a permanent home for the school;
- the school has been set up by Langley Park Academies, which consist of schools within Bromley, and all of the schools will benefit both educationally and financially from Langley Park Primary being sited so close to the lead school, Langley Park Girls School;
- this site has been selected after extensive research and discussions;
- there are no fundamental issues of principle;
- would hope the special circumstances relating to the school and the absence of alternatives would allow the Council to consider this a special case that overrules any identified harm;
- staff and students alike will benefit from the cross-key stage, cross-curricular benefits of working closely together;
- the new Langley Park Primary school is more easily accessible by walk from the Langley Park area, which hopefully contributes to some reduction in traffic towards Unicorn in the longer term;
- believe such concerns can be addressed by staggering school timings, quick drop off point (like at Unicorn), general encouragement for children to walk to school (e.g. stickers/prizes for those who walk regularly), provision for bikes/scooters etc;
- the drop-off facilities look good;
- Glebe School Governors would like to endorse our Head Teacher's wholehearted support for the development of Langley Park Primary School and his praise for the work of the school and the community it serves;
- the building is unobtrusive and slots within the land nicely;
- it will not have any negative impact to neighbours;
- we see huge potential to improve bike routes to school;
- the bike ride will take 5 minutes which even in bad weather conditions is to be preferred over a tedious car drive.

Comments from local Amenity groups:

Bromley and Beckenham Hockey Club

*Background:*

- Bromley and Beckenham HC co-operate the Astro-Turf at Langley Park School for Girls with the girl's school;
- this is operating under a community use agreement and licence;
- Bromley and Beckenham is a community club and responds to the planning permission with a view to protecting the asset;
- the club has ambitions to grow and deliver hockey to more people in the local community, building on the back of Olympic Success at Rio 2016;

- Bromley and Beckenham HC is the largest Hockey Club in South East London and North West Kent with over 550 members: 16 adult teams and over 300 juniors;
- the club invested significantly in the hockey AstroTurf with significant funding from both Sport England and England Hockey in spring and summer 2016;
- the pitch is used intensively all year around by the club outside school hours and in school holidays;
- the club's non-playing home is at Beckenham Sports Club (formerly Beckenham Cricket Club) on Foxgrove Road in Beckenham;
- this means that the club is currently unable to provide shelter for players, spectators and children on training camp; let alone provide a tea or coffee;
- the club believes that now is not the right time to move away from Beckenham Sports Club, however this is a long term consideration for the club.

*Pitch Operations:*

- Club has serious concerns about the risk of damage to the newly installed hockey pitch with the construction of Langley Park Junior School happening in such close proximity to a newly resurfaced AstroTurf pitch;
- concerns cover both damage from impact and damage from flow of materials across the pitch;
- further to this the club has concerns about reduced access to the pitch during the construction period due to the movement of plant and machinery.

*Community Use:*

- the long term ambition for the club is to build a strong partnership with all three schools on the site;
  - o we will continue to work with Langley Park School for Girls on the AstroTurf Pitch;
  - o we will build stronger relationships with Langley Park School for Boys to continue to access their AstroTurf Pitch.
  - o deliver pre-match meeting rooms / ad-hoc changing space, toilet access and space for parents and visitors to get a coffee;
  - o the junior school building, with its direct adjacency to the pitch would provide an ideal location for the club to have access to some facilities on a key holder basis.

When the pitch was installed there was always a desire to have a fresh water tap connected to the pitch. This would enable players to refill water bottles and would enable cleaning of the pitch where water is required. As utility works will be taking place we hope this can be completed at minimal cost.

*Proposal 2 - Key Holder Access to the Langley Park Junior School:*

- to enable the club to take the next step and really provide a community feel that supports families we need to be able to provide a covered space for spectators and a space where we can serve tea and coffee, ideally with a view of the pitch. In an ideal world, we would have a small storage space where we can keep a kettle, microwave and small fridge to support this. We would also have 4 flexible spaces for teams to meet before a game, similar to a changing room (although we are not looking for changing rooms and shower facilities). Finally we would look to provide toilet facilities;

- we believe that can be delivered with minimal disruption to the school as we would only be looking for access on a weekend and the very occasional. We would also look to get key holder access to the relevant parts of the school building to minimise disruption to school staff. We are also happy to pay reasonable costs to enable this;
- the facilities would give us the potential to run far more summer holiday camp activity, host tournaments and deliver training courses. We would also aim to work with other community sports clubs to host meetings in the evenings, by prior arrangement with the school to make the site a real hub for community sports activity.

*Proposal 3 - Future Utility Access:*

- it is a long term objective of the club to build a permanent base at Langley Park School, as highlighted above, we already work closely with Langley Park School for Girls and have a good relationship with Langley Park School for Boys as many of their pupils and staff play for the club;
- as part of the negotiations with Langley Park School for Girls (and Langley Park Academies) we raised the prospect of building a changing room facility to the South of the AstroTurf pitch adjacent to the lane, which leads to the boys school pitch. This facility would provide both the hockey club and the community with additional changing rooms and a meeting space. While this is a long term ambition, we recognise the distance the potential site is from the nearest utilities connections. We would therefore request that the school's developer, under a section 106 take utilities connections to the proposed club house site, or at least extend them to beyond the school buildings for ease of access in the future. This would link with the tennis courts that are being provided on site and the existing sports facilities.

## **Consultee Comments**

GLA stage 1 comments (summary - full comments attached as Appendix 1):

London Plan policies on provision of school on Metropolitan Open Land and playing fields, community use, urban and inclusive design, sustainable development 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 Metropolitan Open Land and 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 MOL and playing fields. This should also address the concerns expressed previously to the Council regarding its proposed site re-designation.

**Sports facilities:** The loss of existing sports facilities is unacceptable. The applicant must robustly justify the loss and should be able to demonstrate how it will be compensated working together with Sport England and local sports clubs.

**Community use:** A community use plan, which makes available the sport facilities in the school for community use outside the school's core hours, should be secured.

**Urban and inclusive 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. To ensure the application accords with London Plan Policy 7.2, the Council should secure all the proposed inclusive design measure with appropriate conditions.

**Sustainable development:** The proposal does not meet the 35% requirement as required in Policy 5.2 of the London Plan. The total site wide carbon emission savings for each stage of the energy hierarchy has not been provided. Further information related to the energy hierarchy breakdown, dynamic modelling for overheating and renewable energy options should be provided before compliance with London Plan energy policies can be verified.

**Transport:** Car parking provision should be reduced and sustainable travel promoted for both pupils and staff. Shower and changing facilities should be provided for employees and the travel plan should be improved in line with STARS system. A construction logistics plan should also be secured by condition.

**Further comments from the GLA following the receipt of amended docs received 12/07/17:**

**Land Use:** Additional sequential site assessment appears exhaustive but we will liaise with the Council Officers if there remain other sites to be explored. There still remains assessment of expansions of existing schools that may accommodate the proposals.

**Sport England / Playing Fields and the CUA:** Further engagement with Sport England is required in regard to the quantitative loss of sport facilities and playing fields. The loss of playing fields on the site should be assessed in the context of the proposals on the site, on its own merit. It should not be cross-referenced to what is going on elsewhere. Whilst drafting the CUA is much appreciated, Sport England and the local clubs and the Council should be consulted in the production of the Community Use Agreement.

**Urban and inclusive design:** It is welcomed that the design has been agreed with Bromley and details of materials and the cladding specifications are submitted. However, the agreed materials, cladding specifications and the proposed design measures must take into account robust fire safety strategy, and all these should be conditioned.

**Sustainable development:** It is welcomed that now the proposal meets the London Plan target of 35% carbon savings. Subject to appropriate conditions

securing the proposed measures outstanding energy issues are resolved, which is welcomed.

**Transport:** Your response on outstanding transport matters is being assessed by TfL's officers, and further comments will be forwarded as soon as we have got their feedback.

#### Sport England:

The proposed development would result in the loss of five tennis/four netball courts and would encroach onto the playing field to an extent that the development would compromise the cricket, athletics and football use of the playing field by preventing the pitches being marked out. This is considerably concerning since there appears to be a shortage of cricket facilities in the Borough (as confirmed by the England and Wales Cricket Board). Sport England, therefore, does not consider the provision of the proposed games courts/playground to outweigh the loss of the tennis/netball courts and playing pitches/field.

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

To overcome these concerns Sport England advises considering an alternative site or the provision of equivalent (at least) playing pitches/courts within the locality. There is a site to the east off St. Dunstan's Lane that could be explored that appears to have a football pitch and cricket wicket without the required boundary distance (provided the football pitch is incorporated in any scheme and the England and Wales Cricket Board have no concerns with the loss).

#### **Updated Sport England Comments following receipt of proposed pitch layouts (31/08/17):**

- The proposal to move the cricket wicket is welcomed and does suggest that the existing cricket pitch could still be accommodated on the site. ECB will still need to comment on the proposals put forward and their preferred option;
- the proposed options, however, would still have an impact on football and would, at the least, render it difficult to shift the football pitches to limit wear and tear of the same areas of land but the proposals could result in the loss of a football pitch altogether;
- the Football Foundation and London FA have advised that the area for football should not be decreased;
- in addition to this, there is still a considerable loss of playing field land in an area where there is not an identified surplus of playing field land and, as indicated in previous correspondences, the sporting benefits of the scheme would not outweigh the harm caused by the partial loss of playing field;
- the presence of other planning field/sports facilities in the area does not render that a playing field is surplus - there are many other factors to consider such as any shortfalls of provision, whether the adjacent sites can be accessed by all the community, whether those sites are overplayed, the impact of



growth/population projections (more homes will result in an increase in demand for sport facilities) and much more;

- if every alternative site is unviable for a replacement provision then maybe revisiting the design /layout of the proposed school for an innovative solution or consider alternative benefits could be considered, for example has providing MUGA's/sports courts on the roof of the building been considered?

- alternatively, if a plan can be provided showing summer and winter pitch layouts (i.e. showing the cricket pitch and two football pitches with the appropriate safety 'run-off' areas and areas allowing some degree ability to shift the pitches) with improved MUGA's (compared to the current facilities), playing field quality improvements (thereby increasing the playing capacity and durability of playing field) and a commitment to secure community use through a Community Use Agreement, then this could be considered to fall within Sport England's Playing Field Policy Exceptions;

- Sport England does not consider that the proposed options would meet its Playing Field Policy Exceptions and still maintain its objection.

### Transport for London (TfL):

#### *Parking:*

A total of 20 car parking spaces are proposed across the site. It is understood that there is currently no on-site parking provision at this site or at the temporary school location and therefore TfL suggests this provision is reduced. Whilst it is acknowledged that there are limited public transport modes available in the area, given the schools catchment area, walking and cycling should be promoted as a key travel option for both pupils and staff.

Although the Transport Assessment states that completed surveys showed that 60% of the staff and 10% of the pupils would like to use car based travel, this should not be encouraged and as stated at the pre-application stage, sustainable travel should be supported. TfL recommends the number of spaces is reduced in accordance with the London Plan's aspirations to promote walking and cycling.

Notwithstanding the above comments, TfL welcomes the provision of active and passive electric vehicle charging points along with Blue Badge parking spaces, all in line with the London Plan.

Cycle parking has been provided in line with the London Plan standards, with 4 long stay staff spaces, 53 long stay pupil spaces and 5 short stay spaces. It is understood that some scooter parking will be provided instead of cycles due to the demand. TfL is satisfied with this approach, but the number of spaces should be confirmed. In line with the London Plan, TfL requests shower and changing facilities are provided for all employees to further encourage sustainable travel.

#### *Travel Plan:*

There is no mention of the Sustainable Travel: Active, Responsible, Safe - STARS system or the school's aspirations to work towards their accreditation in the Travel Plan submitted in support of the application. The school should work towards achieving bronze level while at the temporary site, through delivering travel activities towards this level of the accreditation. Through the first year at the new

site, they should then work towards silver accreditation which will be key in reducing congestion during the peak periods considering the limited public transport available and the secondary schools located so closely.

Following on from the points raised above about encouraging active travel, TfL requests the school travel targets are included in the School Development / Improvement Plan; this will ensure the profile of school travel remains a priority. A School Champion, someone who will coordinate and oversee the School Travel Plan and all the activities included should also be identified and appointed. It is also requested that a School Working Group is created which includes a member of SMT, the School Travel Champion and pupils.

A Travel Planning Event should be organised within six months of the school's initial occupation and the School Travel Champion will be responsible for this. The event should focus on promoting awareness, involvement and enthusiasm in sustainable and active transport amongst both pupils and their guardians. It should be noted that Bromley Council has specific primary school travel advisers within the Road Safety team who can support the delivery of these events and work with the school to implement and deliver the Travel Plan.

*Construction Logistics Plan:*

TfL requests that a Construction Logistics Plan (CLP), as referred to in the London Plan Policy 6.3, which identifies efficiency and sustainability measures to be undertaken while developments are being built, is secured by condition. The final version should be approved by Bromley Council and in consultation with TfL before construction work commences on site.

The Council's Highways Development Engineers:

*Existing Access and Servicing:*

There is no existing vehicular access into the site however Hawksbrook Lane is wide enough for vehicles to access to locality of the courts for maintenance and or servicing needs.

*Travel Modes:*

A hands up survey was completed for the existing Travel Plan for the temporary site in November 2016 which identified the existing mode share for both pupils and staff. This is set out in Table below:

Existing Mode Share

<b>Mode</b>	<b>Pupils</b>	<b>Staff</b>
Car	0%	0%
Car Share	0%	0%
Rail	2%	0%
Bus	0%	0%
Bicycle	4%	0%
Walk	8%	0%
Park & Walk	86%	100%
<b>Total</b>	<b>100%</b>	<b>100%</b>

The above table is unrealistic as it indicates that no pupil or staff members drive to the school.

As part of the hands up survey completed, pupils and staff were also asked which modes of transport they would like to use for their journeys to and from the school. The results of this survey are presented in Table below.

Aspirational Mode Share

Mode	Pupils	Staff
Car	0%	0%
Car Share	0%	0%
Rail	2%	0%
Bus	0%	0%
Bicycle	4%	0%
Walk	8%	0%
Park & Walk	86%	100%
<b>Total</b>	<b>100%</b>	<b>100%</b>

Again the above table is unrealistic, it is assumed that a large portion of the teachers and parents would drive to the school.

*Local Highway Network:*

A survey of existing traffic flows and vehicle speeds was carried out on Hawksbrook Lane between December 1st and December 7th 2016 and recorded traffic flows and speeds in both an easterly and westerly direction. The survey results identify an average weekday flow of 204 vehicles eastbound and 164 vehicles westbound during the AM peak period on Hawksbrook Lane. During the afternoon peak period the average eastbound flow was observed as 101 vehicles with an average of 170 vehicles travelling westbound.

As Hawksbrook Lane does not provide a through route, it can be assumed that all traffic using Hawksbrook Lane is associated with the two existing educational facilities, The Langley Park School for Boys and the Langley Park School for Girls and the Langley Park Sports and Social facility.

*Parking:*

Parking surveys (01 December 2016) were undertaken along the length of Hawksbrook Lane, including the existing area of car parking adjacent to the Langley Park School for Girls, in front of the existing MUGA sports pitch. The on street parking provided on Hawksbrook Lane comprises approximately 28 unmarked parking spaces adjacent to the southern side of the carriageway. Double yellow line parking restrictions are in place along the length of the northern side of the carriageway to prevent further parking and blocking of the highway.

Time	08:00-09:00		Time	15:00-16:00	
	Parked	Parking		Parked	Parking

	Cars	Stress		Cars	Stress
08:00-08:05	28	100%	15:00-15:05	23	82%
08:05-08:10	25	89%	15:05-15:10	21	75%
08:15-08:20	26	93%	15:15-15:20	20	71%
08:20-08:25	26	93%	15:20-15:25	17	61%
08:25-08:30	25	89%	15:25-15:30	12	43%
08:30-08:35	25	89%	15:30-15:35	14	50%
08:35-08:40	25	89%	15:35-15:40	13	46%
08:40-08:45	25	89%	15:40-15:45	16	57%
08:45-08:50	25	89%	15:45-15:50	18	64%
08:50-08:55	25	89%	15:50-15:55	18	64%
08:55-09:00	26	93%	15:55-16:00	19	68%

The existing on street parking was observed to be a minimum of 89% occupied during the AM peak period with a minimum of 25 vehicles parked on Hawksbrook Lane. The peak demand occurred at 08:00-08:05 when all 28 spaces were occupied (100%).

During the PM peak period the minimum demand was for 12 spaces which equates to a parking stress of 43%. The peak parking demand during the PM peak was at 15:00- 15:05 when 23 spaces were occupied (82% stress).

The results of the parking beat survey on Hawksbrook Lane indicates that during the AM peak period there is little to no spare capacity for vehicle to park. During the PM peak however, there was observed to be a minimum of 5 vehicle spaces available.

Hawksbrook Lane Car Park Parking Survey Results:

Time	Parking	
	Parked Cars	Parking Stress
08:00-08:15	27	79%
08:15-08:30	32	94%
08:30-08:45	33	97%
08:45-09:00	33	97%
15:00-15:15	25	74%
15:15-15:30	20	59%
15:30-15:45	18	53%
15:45-16:00	17	50%

The results of the car park survey indicates that during the AM peak the car park is near capacity with a minimum demand for 27 spaces between 08:00-08:15 and a maximum demand for 33 spaces between 08:30-09:00. During the PM peak period the minimum demand for parking was observed at 17 spaces (50% stress) between 15:45-16:00 with the peak demand occurring between 15:00-15:15 when 25 spaces were occupied (74%).

The results of the car park survey therefore identify that during the AM peak period there were observed to be a minimum of 4 spaces on either Hawksbrook Lane or within the existing car park. During the PM peak there were observed to be a minimum of 8 spaces available either on Hawksbrook Lane or within the existing car park.

*Proposed Access and Servicing Strategy:*

The site will provide segregated pedestrian and vehicle access points, both of which will be served directly from Hawksbrook Lane.

The vehicular access point will comprise a circulatory access directly from Hawksbrook Lane with an area for drop-off and pick-up. This area will also provide an area for servicing to the site and delivery trips which are to be managed so as to not conflict with typical arrival and departure profiles for both staff and pupils. The vehicular access also provides a route into the staff car park which runs alongside the eastern boundary of the site.

The works must be secured through Section 38/ 278 agreement. Furthermore any amendments to the Traffic Regulation Order must be funded by the applicant.

*Staff Parking:*

This car park will provide a total of 15 car parking spaces and will be secured by a barrier with key card access to ensure use is retained solely for staff parking. However, this number of staff car parking should be increased to 18 allow all staff members park on site and reduce the congestion on Hawksbrook Lane.

A dedicated drop-off and pick-up area is proposed to the north of the site through the widening of Hawksbrook Lane to the north and the provision of a circulatory within the site to allow vehicles to enter drop-off / pick-up and exit in a continuous movement. The drop-off / pick-up point provides dedicated areas for vehicles to set down pupils and pick-up pupils directly from the site and surrounding footways. Links into the site are then well supported by the proposed footway alongside the northern extent of Hawksbrook Lane and the dedicated, informal crossing point.

*Cycle Parking:*

Cycle parking is to be provided adjacent to the school building and will be provided according to London Plan standards.

*Proposed Use Modal Split and Person Trip Generation:*

A review has been undertaken of three local primary schools to assess the local tendency for different modes of travel for pupils to and from school. The three schools reviewed were the Unicorn Primary school, located to the north of the site on Creswell Drive, Pickhurst Infant and Junior Primary school, located to the east of the site adjacent to Pickhurst Lane and Clare House Primary School located to the north of the site adjacent to Oakwood Lane.

This exercise has been completed to review the existing mode share within the locality of the proposed site to provide a target against which the forecast trip generation and mode share within the Travel Plan can be based.

The observed pupil mode share for each school is presented in Table below:

Mode	Unicorn Primary	Pickhurst Infant & Junior	Clare House Primary	Average
Car	44%	19%	31%	31%
Public Transport	2%	1%	2%	2%
Cycling / Scooter	7%	3.2%	12.1%	7%
Walking	37%	44.7%	41.3%	41%
Park & Stride	9%	28.3%	12.9%	17%
Car Share	2%	3.6%	0.8%	2%
Other	0%	0%	0.7%	0%
Total	100%	100%	100%	100%

The average observed mode share for car trips is 31% with the majority of trips comprising walking (41%). Park and Stride accounted for 17% of all trips with cycling 7%, car sharing 2% and public transport the remaining 2%.

The applicant's forecast mode share for each year of enrolment is set out in Table below:

	2018	2019	2020	2021	2022
Mode	Share	Share	Share	Share	Share
Car	86%	77%	68%	59%	50%
Walk	8%	16%	25%	33%	41%
Cycle	4%	5%	6%	6%	7%
Public Transport	2%	2%	2%	2%	2%
Total	100%	100%	100%	100%	100%

The forecast mode share has been combined with the proposed number of pupils to forecast the total person trip generation and mode share for the development. This is set out in Table below:

	2018	2019	2020	2021	2022
Mode	Share	Share	Share	Share	Share
Car	155	185	204	212	209
Walk	14	39	74	118	172
Cycle	7	11	17	23	29
Public Transport	4	5	6	7	8
Total	180	240	300	360	420

The aspirational targets identified by staff set out the long term strategy against which the Travel Plan that accompanies this Transport Assessment seeks to build upon as the school enrolls each year group. The forecast staff mode share has

therefore been based upon a starting point of the current travel habits with a goal of achieving the aspirational targets over the five year period between opening and full occupation in 2022.

The forecast trip generation for the staff attending the proposed school illustrates a total peak of 18 car trips during both 2021 and 2022 with walking trips also peaking at 12 trips in 2022. A review of the existing parking stress on both Hawksbrook Lane and the existing car park to the south of Hawksbrook Lane identifies that there is a minimum of 4 spaces during the AM peak or 8 spaces during the PM peak.

However the above staff numbers using a private car is very optimistic. The number of staff car parking should be increased to 18 allow all staff members park on site and reduce the congestion on Hawksbrook Lane.

*Hawksbrook Lane / S Eden Park Road junction:*

This junction takes the form of a four arm offset priority junction with South Eden Park Road the mainline flow. Hawksbrook Lane joins from the east with a single lane entry and exit whilst Upper Elmers End Road joins from the west in the form of a two lane entry only onto South Eden Park Road.

It was agreed during scoping discussions that this junction should be reviewed in terms of capacity with regard to the forecast traffic generation associated with the new primary school. In order to allow the capacity of this junction to be modelled, traffic surveys were commissioned on Thursday 1st December 2016 for the morning period of 07:00 - 10:00 and the afternoon period of 14:00 - 17:00.

This junction has been modelled using Junction 9 software for the time periods 08:00- 09:00 and 15:00-16:00 for three traffic composition scenarios as set out below:

- o 2016 Observed;
- o 2022 Baseline, and;
- o 2022 With Development.

The modelling results indicate that the junction is currently operating within capacity and remains so for the future year baseline assessment in 2022. The impact of the proposed development is to push the junction up to the maximum desirable level of capacity of 0.9 during both the AM and PM peak periods. A review however of the associated queues with this capacity identifies that the peak forecast queues are 8 vehicles during the AM peak and 7 vehicles during the PM peak. This equates to a queue length of a maximum of 48m which is less than the distance from the junction to the first car park access point. However the figures used are optimistic and depending on the parents and staff reducing their car usage. Nonetheless this needs to be resolved by a sensitivity test.

The applicant is required to address the following:

- o Increase the number of staff parking to 18 spaces.

o Sensitivity test should be carried out to determine the junction calculations are robust; i.e. high number of private cars dropping off and picking up pupils at school, 68% of parents will be transporting their children by car by 2022.

**Updated Highways comments following receipt of addendum to Transport Statement (12/07/17):**

- 18 standard parking spaces, including three with active electric charging and three with passive electric charging infrastructure, and two blue-badge bays, the latter of which will also be accessible by visitors to the site, are proposed - this is acceptable;
- The junction has been re-tested based on the assumption that a total of 68% of parents will drive to / from the site;
- The results indicate that the junction will remain under full capacity until 2022;
- In 2022, when the school is fully occupied, RFC is forecast to peak at 1.02, which is above maximum capacity suggesting the junction would be over capacity;
- Queue lengths are forecast to peak at 16 vehicles during the morning, this would mean a maximum queue length of 96m, which is close to the 100m distance from the junction to the first car park access point;
- This means that queueing may have a detrimental impact on Hawksbrook Lane;
- However Hawksbrook Lane serves the schools and Langley Park Sport & Social Club with no residential properties fronting the road, therefore the queues will have little impact on the main thoroughfare South Eden Park Road;
- When considering the distribution of pupils arriving / departing from the school, the assessment assumes that the route the parents take to / from the school on each trip is the same and is based on the nodal point catchment areas for the pupils;
- In reality, many of the parents will be travelling to other destinations once they have dropped their children at / picked their children up from school and therefore their access routes will vary which could result in fewer trips travelling through the South Eden Park Road/Hawksbrook Lane junction than currently predicted and / or with different directions of travel at the junction;
- The School Travel Plan would be used and will evolve over the lifetime of the schools to promote and support a range of measures to encourage parents and their children to travel to the school site by sustainable means;
- The trip generations assessments do not allow for car sharing by pupils, with all trips by car being considered as a single pupil trip;
- It is clear that the school will have a number of pupils that are siblings of other pupils at the school, and also potential siblings of pupils attending the Langley Park school;
- Conditions are recommended should Members be minded to grant planning permission.

**Updated Highways comments following receipt of amended plans (04/08/17):**

- The amended plans are acceptable. As stated previously all works on Hawksbrook Lane are subject to Section 38/278 agreement.



### The Council's Travel Plan Advisor

Overall most aspects of the Travel Plan have been covered. Would recommend that the Travel Plan Consultant, gets in contact with us, to start working on a TfL STARS Travel Plan, which would be approved by Bromley Officers. On review there seems to be a lack of detail regarding Train transport links, as Eden Park and West Wickham are in close proximity. Additionally, there is no information regarding the potential impact on parking in the local roads.

### The Council's Drainage Officer:

The findings of the submitted FRA carried out by geosphere environmental ltd to incorporate green roofs, permeable paving and tanks to store surface water run-off are accepted, however the "Proposed Drainage Strategy Layout " sheets 1 & 2 plans to provide two tanks to reduce surface water run-off to 5l/s are insufficient because the hierarchy of the SUDS have not been considered.

The applicant should use the hierarchy of SUDS to be included in the surface water strategy in accordance with LONDON PLAN Policy 5.12 and 5.13.

Following discussions with the Applicant's Drainage consultant the Council's Drainage Officer has agreed for the drainage strategy to be amended to reflect 3.8l/s overall discharge to the Watercourse. A revised surface water drainage strategy was submitted on 28/09/17 which is considered acceptable, in principle. A condition is recommended for a detailed surface water drainage scheme for the site to be submitted, based on the agreed revised strategy.

### The Council's Environmental Health Officer:

#### *Air Quality*

Concurs with the findings of the Air Quality Assessment carried out by Aether Ltd (Version 3 - 7 February 2017) in so far as it relates to pollutants resulting from increased traffic but can find no mention of a heating scheme for the school.

#### *Contaminated Land*

Has seen the Phase 2 Ground Investigation Report prepared by Geosphere Environmental Ltd (1959,GI/GROUND/DJB,SG/26-10-16/V1) and agree with the findings and recommendations. Recommend a condition requiring a Remediation Method Statement to be submitted which should include additional sampling and gas monitoring.

#### *Lighting*

The Proposed External Lighting Scheme is detailed in the Bowmer & Kirkland drawing LPPS-RPS-OO-XX-DR-E-6303 REV S4. There are no objections to this proposal.

#### *Noise*

- (a) Agree that BS4142:2014 should be used to assess the noise impact of all external plant which may be installed, however the Noise Rating should be 10dB(A) below the existing background, and not as stated in the Report (Para 4.3);
- (b) Agree with the approach regarding compliance with BB93, however as this is enforced under the Building Regulations you may wish to also consult Building Control (Para 4.2);
- (c) Given the proximity to Langley Park Schools, it is not considered that the noise generated by additional pupils and additional vehicle movements will be significant.

#### *Construction noise and dust*

Recommend an informative regarding compliance with the Control of pollution Act 1974 and/or the Environmental Protection Act 1990.

Following the submission of a Heating Strategy on 04/08/17 and a Remediation Strategy on 25/08/17 the Council's Environmental Health Officer confirms that the use of natural gas as a fuel and the proposed discharge flue are satisfactory.

As far as the Remediation Strategy is concerned it is not recommended that this is adequate as it takes no account of the ground gases. The Original Phase 2 Report recommends "...a minimum requirement for gas protection measures should be adopted, and may comprise of a proprietary gas resistant membrane installed to reasonable levels of workmanship..." This recommendation appears to have been overlooked.

A noise condition is recommended requiring a further Noise Impact Assessment be carried out in relation to fixed plant.

#### Thames Water:

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.

With regard to sewerage infrastructure capacity, there are no objections to the proposal.

#### Natural England:

Natural England has no comments to make on this application and refers the Local Planning Authority to their Standing Advice on protected species.

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

The consultation documents indicate that this development includes an area of priority habitat, as listed on Section 41 of the Natural Environmental and Rural Communities (NERC) Act 2006. The National Planning Policy Framework states that 'when determining planning applications, local planning authorities should aim

to conserve and enhance biodiversity. If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.'

#### Historic England:

An archaeological desk based assessment (DBA) has been submitted as part of the current planning application, however the area of land defined within the DBA does not accord with that provided as part of the planning application. The latter includes an area of land to the south, the inclusion of which increases the site footprint from c.0.7ha to 1.5ha. The southern part of the planning application is to contain relocated games courts, which could potentially impact on any underlying archaeological deposits. In addition, it is noted that the DBA does not include reference to any existing aerial photography and LIDAR data, both of which could provide valuable information in the predetermination consideration of the previously undeveloped parts of the site.

Recommend that a revised desk based assessment is carried out to include the site outline as submitted as part of the current application.

If archaeological safeguards do prove necessary, these could involve design measures to preserve remains in situ or where that is not feasible archaeological investigation prior to development. If a planning decision is to be taken without the provision of sufficient archaeological information then we recommend that the failure of the applicant to provide adequate archaeological information be cited as a reason for refusal.

#### **Updated Historic England comments following the receipt of the revised archaeological assessment (July 2017):**

Appraisal of this application using the Greater London Historic Environment Record and information submitted with the application indicates that the development is likely to cause some harm to archaeological interest but not sufficient to justify refusal of planning permission provided that a condition is applied to require an investigation to be undertaken to advance understanding. Condition recommended regarding a written scheme of investigation being submitted and approved.

#### **Further comments following the receipt of the Archaeological Written Scheme of Investigation (August 2017):**

The submitted document accords with relevant standards and guidance and is in compliance with the condition. Once the WSI has been approved, the start date should be communicated by the archaeological practice to this office. The archaeological condition will not be fully satisfied until all works are complete, including any post-excavation assessment/analysis leading to publication.

#### The Metropolitan Police Designing out Crime Officer:

Having given due consideration to the details of the security and safety features, there are no objections to the application. A planning condition requiring that this development achieve SBD accreditation is recommended.

## **Planning Considerations**

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 Council is preparing a Local Plan. The submission of the Draft Local Plan was made to Secretary of State on 11th August 2017. These documents are a material consideration. The weight attached to the draft policies increases as the Local Plan process advances.

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

- BE1 Design of New Development
- BE4 Public Realm
- BE6 Environmental Improvements
- BE7 Railings, Boundary Walls and Other Means of Enclosure
- BE16 Ancient monuments and archaeology
- C1 Community Facilities
- C7 Educational and Pre-School Facilities
- C8 Dual Community use of Educational Facilities
- ER7 Contaminated Land
- ER10 Light Pollution
- G2 Metropolitan Open Land
- IMP1 Planning Obligations
- L2 Public Rights of Way and Other Recreational Routes
- L6 Playing Fields
- NE2 Development and Nature Conservation sites
- NE3 Nature Conservation and Development
- NE5 Protected Species
- NE7 Development and Trees
- NE9 Hedgerows and Development
- NE12 Landscape Quality and Character
- NE13 Green Corridors
- T1 Transport Demand
- T2 Assessment of Transport Effects
- T3 Parking
- T6 Pedestrians
- T5 Access for People with Restricted Mobility
- T7 Cyclists
- T8 Other Road Users

T9 and T10 Public Transport  
T11 New Accesses  
T15 Traffic Management  
T16 Traffic Management and Sensitive Environments  
T17 Servicing of premises  
T18 Road safety

Planning Obligations Supplementary Planning Document (SPD)  
Supplementary Planning Guidance 1: General Design Principles

Relevant policies from the Draft Local Plan include:

20: Community Facilities  
26: Health & Wellbeing  
27: Education  
28: Educational Facilities  
29: Education site Allocations  
30: Parking  
31: Relieving Congestion  
32: Road Safety  
33: Access for All  
37: General Design of Development  
46: Ancient Monuments and Archaeology  
50: Metropolitan Open Land  
53: Land Adjoining Green Belt or Metropolitan Open Land  
57: Outdoor Recreation and Leisure  
58: Outdoor Sport, Recreation and Play  
72: Protected Species  
73: Development and Trees  
77: Landscape Quality and Character  
78: Green Corridors  
79: Biodiversity and Access to Nature  
116: Sustainable Urban Drainage Systems (SUDS)  
118: Contaminated Land  
119: Noise Pollution  
120: Air Quality  
122: Light Pollution  
123: Sustainable Design and Construction  
124: Carbon dioxide Reduction, Decentralised Energy Networks and Renewable Energy  
125: Delivery and Implementation of the Local Plan

Relevant London Plan Policies include:

2.18 Green Infrastructure: the multi-functional network of green and open spaces  
3.18 Education Facilities  
3.19 Sports Facilities  
5.2 Minimising Carbon Dioxide Emissions  
5.3 Sustainable Design and Construction  
5.6 Decentralised Energy in Development Proposals

- 5.7 Renewable Energy
- 5.9 Overheating and Cooling
- 5.10 Urban Greening
- 5.11 Green roofs and development site environs
- 5.12 Flood Risk Management
- 5.13 Sustainable Drainage
- 5.14 Water Quality and Waste Water Infrastructure
- 5.15 Water use and Supplies
- 5.21 Contaminated Land
- 6.1 Strategic Approach
- 6.3 Assessing the Effects of Development on Transport Capacity
- 6.9 Cycling
- 6.10 Walking
- 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
- 7.14 Improving Air Quality
- 7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes
- 7.17 Metropolitan Open Land
- 7.18 Protecting open space and Addressing Deficiency
- 7.19 Biodiversity and Access to Nature
- 7.21 Trees and Woodland
- 8.2 Planning Obligations
- 8.3 Community Infrastructure Levy

The 2015-16 Minor Alterations (MALPs) have been prepared to bring the London Plan in line with the national housing standards and car parking policy. Both sets of alterations have been considered by an independent inspector at an examination in public and were published on 14th March 2016. The most relevant changes to policies include:

#### 6.13 Parking

The relevant London Plan SPG's are:

- Green Infrastructure and Open Environments: The all London Green Grid (2012)
- Accessible London: Achieving an Inclusive Environment (2014)
- Sustainable Design and Construction (2014)
- Social Infrastructure (2015)

The National Planning Policy Framework 2012 (NPPF): relevant paragraphs

- Para 14: Achieving sustainable development
- Para 17: Core planning principles
- Paras 29 - 41: Promoting sustainable transport

Paras 56 - 66: Requiring Good Design  
Paras 71 - 75: Promoting healthy communities  
Paras 93-103: Meeting the challenge of climate change & flooding  
Paras 109-125: Conserving and enhancing the natural environment  
Paras 128, 135,139: Conserving and enhancing the historic environment  
Paras 188-195: Pre-application engagement  
Paras 196-197: Determining applications  
Paras 203-206: Planning conditions and obligations

## **Planning History**

While there is extensive planning history relating to the existing Langley Park School for Girls and Langley Park School for Boys there is no previous planning history for this particular site.

An Environmental Impact Screening Opinion in relation to the proposed primary school was requested by the applicant and a decision was issued by the Council on 31st March 2017 which confirmed that the proposed development is not "EIA development" within the meaning of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 (as amended) (ref.DC/17/01225/EIA).

## **Assessment**

The NPPF, at paragraph 14, sets out a presumption in favour of sustainable development and states that for decision-taking this means approving development proposals that accord with the development plan without delay; and where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted.

The main issues to be considered in relation to the proposal are the impact that the proposed school would have on the openness, aesthetic quality and accessibility of the Metropolitan Open Land (MOL), including whether or not such a form of development is 'appropriate' and, if not, whether 'very special circumstances' exist which outweigh the potential to harm to the MOL by reason of inappropriateness and any other harm.

Other material planning considerations in relation to this proposal include:

- Impact on Recreational Use of Land/Playing Fields;
- Impact on Biodiversity;
- Design;
- Impact on residential amenity;
- Parking and cycling provision and Highways impacts;

- Trees and Ecology;
- Sustainability and Energy;
- Flooding and Drainage;
- Impact on Heritage Assets.

## **Metropolitan Open Land**

The Government, in chapter 8 of the NPPF, sets out its aspirations for promoting healthy communities through the planning system. Paragraph 73 recognises the important contribution which "access to high quality open spaces and opportunities for sport and recreation... can make to the health and well-being of communities" and says that "planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision".

The London Plan at policy 7.17 states that the MOL serves the same purpose as Green Belt in that it has an important role to play as part of London's multifunctional green infrastructure and it will be afforded the same level of protection as Green Belt. The Mayor strongly supports the current extent of MOL, its extension in appropriate circumstances and its protection from development having an adverse impact on the openness of MOL.

The MOL shown on the UDP proposals map has been designated in accordance with the criteria set out in the London Plan, namely:

- Land which contributes to the physical structure of London by being clearly distinguishable from the built-up area;
- Land which includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve the whole or significant parts of London;
- Land which contains features or landscape of historical, recreational or biodiversity of national or metropolitan interest;
- Land that forms part of a Green Chain and meets one of the above criteria.

Policy G2 of the UDP and Draft policy 50 are consistent with the London Plan in respect of MOL.

Under NPPF paragraph 87 states that "As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances".

The NPPF goes on to expand upon 'very special circumstances' in paragraph 88: 'When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations'.

To be 'clearly outweighed' implies well beyond in balance.



In accordance with paragraph 89 of the NPPF the following forms of development are considered as exceptions to inappropriate development in the Green Belt:

- buildings for agriculture and forestry;
- provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;
- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or
- limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

The construction of new buildings in the Green Belt and henceforth MOL is then, inappropriate unless it is included in one of the exceptions in NPPF paragraph 89 (or paragraph 90). The provision of a building for use as a school would constitute 'inappropriate development' and the applicant has submitted a case for why they consider 'very special circumstances' exist which outweigh the potential harm that the development would cause the MOL. This is based on the educational need for primary school places in the area and the lack of suitable alternative sites.

#### *Educational Need:*

NPPF Paragraph 72 advises that the Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new Communities, and that Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. Specifically it advises that local authorities should "give great weight to the need to create, expand or alter schools".

The Council has a statutory duty to secure sufficient school places and to keep this provision under review (Education Act (2011)) and this is a material planning consideration. The Academies Act (2012) changed the approach to educational provision and encourages the establishment of new Free Schools (outside Local Authority control).

The NPPF and Academies Act were 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 sets out very strongly the Government's commitment to support the development of state-funded schools and their delivery through the planning system, indicating that the answer to proposals for the development of state-funded schools should be, wherever possible, "yes".

The London Plan (2016) Policy 3.18 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). Policy 3.18 requires 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.

Chapter 13 of the UDP sets out the Council's objectives in supporting the provision of local community services which reinforce a sense of place, strengthen communities and reduce the need to travel. In line with national policy and strategic objectives, a proposal for development that meets an identified education need 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 C1, UDP). Proposals relating to primary schools that are likely to be used by the wider community will also be required to produce and adopt a School Transport Plan (policy C7) identifying measures which will assist in reductions in car usage, reduced traffic speeds and improved safety particularly for pedestrians and cyclists.

The Council is at an advanced stage of its Local Plan preparation. The proposed Submission Draft Local Plan (2017) has been produced on the basis of robust evidence. The Education Background Paper (2016) reflects the Primary School Development Plan (2016) which includes the current Langley Park Free School provision and indicating this provision as continuing until the end of the Local Plan period.

Draft Policy 27 sets out the Council's commitment to choice in education for parents and young people, and that it will work in partnership with agencies and providers, to ensure the provision of an appropriate range of educational facilities: assessing the need for the range of education infrastructure over the plan period and allocating sites accordingly; safeguarding sites for education purposes for the period of the plan and permitting extensions to existing schools which seek to address local need, subject to Local Plan open space and conservation policies, 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.

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 states that 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:

a - open space and conservation policies

b - the need for the provision locally,

c - highway safety, and

d - the accessibility of the site by means of transport other than the car.

Particular weight will be attached to proposals involving the relocation of a Free School, which has operated from a site temporarily for a year, to a more suitable location.

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 also be encouraged.

#### *Lack of Suitable Alternative Sites*

The Education Background Paper sets out the educational need on the basis of Council's reviews of primary 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. The search revealed a lack of policy compliant sites to address the projected need.

The Council's draft Local Plan also proposes increased flexibility to the Urban Open Space policy which facilitates expansion at additional school sites in UOS, however, this change was not sufficient to address expansion / new school needs and therefore a number of existing schools within Green Belt and MOL, including the application site, are proposed to be re-designated to Urban open Space, safeguarded as 'Education Land' for education development only (Draft Policy 29).

However, in advance of the adoption of the local plan and re-designation of the site this carries limited weight at this stage. Adopted national and development plan policy is therefore more relevant and requires that the applicant demonstrates 'very special circumstances' for such inappropriate development in Metropolitan Open Land.

The applicants have also submitted a sequential site assessment and addendum which reflect the findings of the Council's own assessment contained within the Local Plan Education Background Paper and confirm that there are no more suitable alternative sites for the proposed school. While the GLA consider that there still remains assessment of expansion of existing schools to be undertaken, it is noted that the GLA were recently consulted on the allocation of this site in the Submission Draft Local Plan and confirmed their 'broad support' for most of the

education allocations, including this site, provided that development is sited as close as possible to existing buildings and minimises incursion into open space by using existing buildings, car parks and hardstandings. The area to be developed by the school building is currently hardstanding used as tennis courts and is sited near to existing buildings. Officers are therefore satisfied that, in this instance, no other sites remain to be explored and there is a demonstrable lack of alternative sites.

While it is clear that there is a demonstrable educational need for this development and a lack of alternative more suitable sites, very special circumstances will not exist unless the potential to harm the MOL by reason of inappropriateness and any other harm is clearly outweighed by other considerations (Para.88, NPPF). With particular regard to the MOL itself, it is necessary to assess the potential harm to openness. This is considered below.

### *Impact on Openness*

The concept of 'openness' refers to the absence of building; it is land that is not built on. By contrast, the visual impact is a further assessment. This relates to factors such as the aesthetic quality of the proposal and its prominence in the landscape.

The new building would extend into an area of playing field to the south of the existing enclave of school development on the opposite side of Hawksbrook Lane. The site currently comprises of tennis/netball courts and playing fields along with associated hardstanding, wire/mesh fencing and a storage container which does not have any planning permission but appears to have been in situ for some time. There are no permanent buildings on the site. The applicant has attempted to address the visual impact of the development by proposing a relatively compact two storey building with a GIA of 2072sq m; siting it to the north of the site, nearer to the existing built form of the wider Langley School complex and adjacent to the golf course; building upon the existing hard surfaced area of the tennis courts; and using sympathetic materials to help the building assimilate into the landscape. They also intend to partially screen the building from the south by proposing new tree planting.

Nevertheless, the two storey flat-roofed building, which would be predominantly rendered, would appear starker in views from the open parkland to the west, particularly given its box-like structure and its location in a currently open site. The NPPF states that openness is one of the essential characteristics of Green Belts (and therefore MOL). The location of the development in the open area of the site, extending the existing enclave of school development further south into MOL, on part of existing playing fields and towards the fields beyond the site boundary would reduce the openness of the MOL and would thereby harm one of its essential characteristics. This weighs substantially against the proposal.

### *Conclusion on MOL impacts*

The Langley Park Free School is currently operating from its temporary location and contributes to meeting the need for primary provision. While the intentions

going forward in the Draft Local Plan are to re-designate this site to Urban Open Space, in advance of this being adopted the site remains MOL and therefore very special circumstances must be demonstrated.

The need for education provision and lack of alternative sequentially preferable sites has been demonstrated by the applicant and the evidence produced by the Council in the development of its Local Plan backs this up. However, while it is clear that there is a demonstrable educational need for this development and a lack of alternative more suitable sites, very special circumstances will not exist unless the potential to harm the MOL by reason of inappropriateness and any other harm is clearly outweighed by other considerations.

As discussed above, it is clear that this proposal would harm the openness of the MOL and also has the potential to undermine one of its key functions; that is: "Land which includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve the whole or significant parts of London". Nevertheless, the proposals have tried to address the visual impact by proposing a compact building set over two storeys, near to the site boundaries and close to the existing school developments on the opposite side of Hawksbrook Lane, as well as setting the building on an area of existing hard standing, thereby minimising the extent of open land which would be impacted.

At the same time, the proposal would deliver the necessary education infrastructure to meet a demonstrated need and would provide a range of sports facilities which would be available for community use and would be accessible to residents. While the sporting benefits of the scheme would not outweigh the harm caused by the partial loss of playing field, the educational benefits weigh strongly in favour of the proposal and, subject to a full assessment of other considerations which are addressed below, the proposal has the potential to demonstrate that very special circumstances exist to justify this form of development in MOL.

### **Impact on Recreational Use of Land/Playing Fields**

The NPPF (para. 74) and the London Plan (Policy 3.19) preclude the loss of open space, sports and recreational land, including playing fields. Existing open spaces and playing fields should not be built on unless 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.

Policy L6 of the UDP and Draft Policy 58 are consistent with this. In addition, the London Plan, at policy 3.19 'Sports facilities', states that development proposals that increase or enhance the provision of sports and recreation facilities will be supported and the net loss of such facilities, including playing fields, will be resisted.

The applicant states that approximately 1297sq m of playing fields is to be lost through the development equating to approximately 4% of the current playing fields and sports facilities on the site.

Sport England were consulted on the application in light of the development being located on existing playing field and tennis/netball courts and have raised concerns that it would compromise the cricket, athletics and football use of the playing field. There appears to be a shortage of cricket facilities in the Borough and, as such, the provision of the proposed games courts/playground is not considered to outweigh the loss of the tennis/netball courts and playing pitches/field.

Following receipt of proposed pitch layouts, Sport England are of the view that the existing cricket pitch could still be accommodated on the site. However, they still maintain their objection in view of the impact on the football pitches and loss of playing field in an area where there is not an identified surplus.

Sport England therefore objects to the application because it is not considered to accord with any of the exceptions to Sport England's Playing Fields Policy or with Paragraph 74 of the NPPF and have suggested looking at alternative sites for replacement sports provision. Alternatively, an innovative design solution should be looked at for the application site for re-providing sports facilities.

The applicant argues that while there would be a quantitative loss this should be viewed alongside the qualitative improvements including the re-provision of the tennis courts/netball courts to the south of the site and allowing other sporting activities to continue on the western portion of the playing field. They state that the football pitches can be rotated and shifted accordingly to prevent specific wear on parts of the field and there are sufficient run-off areas. The community use agreement would also, in their opinion, enable a variety of sports uses to take place which would benefit the wider community. Whilst they acknowledge that Bromley Council does not have a Playing Pitch Strategy as part of the Local Plan process, in the applicant's opinion, this does not demonstrate that there is a deficit and there are ample pitches and sports facilities surrounding the site that are available for public use.

In terms of providing MUGA's/sports courts on the roof of the building the applicant asserts that this would require a complete redesign of the school to accommodate the additional loading on the roof of the building which would be unviable at this late stage of the design process.

In relation to the proposed alternative site at St Dunstan's' Lane the applicant states that the site is not available for purchase and would not be sequentially preferable being in MOL and giving rise to potential significant highways impacts and the need to acquire a private residential dwelling to overcome these issues.

The GLA has responded by saying that while drafting the Community Use Agreement is useful, this should be developed in conjunction with Sport England and the local clubs and the Council should be consulted in the production of the Community use Agreement. Sport England continues to raise objections to the proposal and, as indicated in previous correspondences, they consider that the sporting benefits of the scheme would not outweigh the harm caused by the partial loss of playing field.

## **Impact on Biodiversity**

The planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, and minimising impacts on biodiversity and providing net gains in biodiversity where possible (Para 109, NPPF).

Policy NE2 of the UDP will only allow development proposals which may significantly effect a Site of Interest for Nature Conservation (SINC) to be permitted where the benefits of the development demonstrably outweigh the interest or value of the site or where harm can be mitigated through conditions or planning obligations. Policy NE5 prohibits development which would have an adverse effect on protected species. The presence of protected species is a material planning consideration.

Policy NE7 of the UDP requires proposals for new development to take particular account of existing trees on the site and on adjoining land, which, in the interests of visual amenity and/or wildlife habitat, are considered desirable to be retained. Policy NE9 seeks the retention of existing hedgerows and replacement planting; where appropriate, recognising the important role they can play in softening and screening new development.

The application is accompanied by an arboricultural report and landscaping plans (both amended 04/08/17) which identify a number of trees which will be impacted by the development. While the initial arboricultural report which was supplied identified a mature Oak Tree for removal at the front of the site this is now shown to be retained and the adoption of non-invasive construction techniques would limit the impact on the root system of the tree. Revised tree protection measures have also been proposed which are considered acceptable. Replacement tree planting should also be secured as part of the landscaping proposals.

In terms of protected species the initial report found medium probability of Great Crested Newts (GCNs) being present on the site in low numbers due to the nearby ponds finding that GCNs may cross the site at night which could result in them being impacted by construction works and recommends further survey work. The applicant states that survey season has now ended for Great Crested Newts and has instead provided an ecological working method statement which recommends mitigation measures to avoid harm to any GCNs which may use the site at night.

The Preliminary Ecological Appraisal also recommends precautionary measures are taken to avoid the development impacting the adjacent SINC. Provided these measures are adhered to the proposal is unlikely to have any significant effects on the SINC or on protected species.

Overall the development is considered acceptable from a trees and ecology perspective.

## **Design**

The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. 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 (Para's 56-57, NPPF).

Planning policies and decisions should aim to ensure that developments will function well and add to the overall quality of the area; 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; respond to local character, reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation; create safe and accessible environments; and ensure that development are visually attractive as a result of good architecture and appropriate landscaping (Para.58, NPPF).

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

The London Plan at policy 7.1 requires developments to be designed so that the layout, tenure and mix of uses interface with surrounding land and improve people's access to social and community infrastructure (including green spaces). Development should enable people to live healthy, active lives, maximise the opportunities for community diversion, inclusion and cohesion and the design of new buildings and spaces should help reinforce the character, legibility, permeability and accessibility of the neighbourhood.

Consistent with this policy BE1 of the London Borough of Bromley Unitary Development Plan (UDP) requires new developments to be imaginative and attractive to look at; complement the scale, form, layout and materials of adjacent buildings and areas; development should not detract from the existing street scene and/or landscape and should respect important views, skylines, landmarks or landscape features; the space about buildings should provide opportunities to create attractive settings and security and crime prevention measures should be included in the design and layout of buildings and public areas. The Draft Local Plan takes a similar stance.

As well as the MOL issues discussed earlier it is also necessary to consider the quality of the development in relation to the surrounding context and whether the development would be harmful to a significant enough degree to merit its refusal despite the great weight which should be attached to the demonstrated need for new school places.

The two storey building would take a linear form with a stepped-down ridge height at the northern end. The external walls would be constructed using a mixture of brick, render and timber cladding. The grounding plinth would be constructed using Wienerberger Anglesey Weatherboard Buff bricks. Above plinth level two



types of light-coloured synthetic render are proposed: beige (colour ref.YO234) and a lighter cream colour above (ref.YO256). It is considered that the use of light coloured materials particularly on the upper half of the building would help to minimise its visual impact in longer-range views of the site to a degree. The northern elevation of the building would be predominantly timber clad in treated Siberian Larch which would help to soften its appearance and help it to assimilate better into the surrounding landscape when viewed from Hawksbrook Lane, and an existing oak tree to the north of the site will be retained to offer a degree of screening for the building from this vantage point. However, such extensive use of render would make the building appear somewhat utilitarian and stark against the surrounding landscape. As such a condition is required for materials to be submitted to the Council for approval subsequent to any permission being granted. The more extensive use of brick over the ground floor of the building would be the Council's preference in this case.

A substantial amount of hardstanding and fencing is required to serve the school and the replacement games courts to the south, and the applicant has proposed a scheme of landscaping including tree screening to the south of the site in order to help minimise the visual impact. Although the starting point with any development proposal should be to provide a high quality design response, rather than reliance upon screening to reduce the visibility and impact of a development in its local context, it is noted that a line of existing tree and shrub planting already extends along the western edge of the proposed games courts up to Hawksbrook Lane and given the dense tree planting abutting the eastern site boundary with Langley Park Golf Course, it is not anticipated that this would result in any additional harm to the character of the area and would help the development to assimilate into its surroundings. Sympathetic materials and an appropriate design would also be required for the proposed fencing and would need to be secured via planning condition.

Although no green roof or wall planting is proposed, which is regrettable as this is a requirement of the London Plan, the applicant has provided a statement as to why they consider that it would not be feasible for this particular project. This is considered acceptable.

Access to the development for pedestrians, vehicles and cyclists can be gained from the west of the site via Hawksbrook Lane while pedestrian and cycle access can also be gained from the east along Hawksbrook Lane or St Dunstan's Lane. Both these routes are classified as Local Cycle Network and are Public Rights of Way. Externally, access to the development is legible and separates vehicle and pedestrian areas through the use of strategic planting and fence lines. The main pedestrian entrance to the school building is from a proposed path leading to a glazed entrance canopy clearly distinguishing it from other parts of the building.

Space is retained about the building for car parking, cycle parking and refuse storage required to serve the development, as well as hard and soft play areas for pupils.

Internally, level access will be provided across the site and entrances, doors and circulation space will all be wheelchair accessible. The layout of the building has

also been designed to allow specific areas to be used by the community out of school hours. Security is integral to the design of the proposal and takes into account the use of the out of hours community use. The applicant has incorporated Secured by Design (SBD) principles within the schools design and layout indicating that SBD accreditation should be achievable.

Overall, the development would connect well to surrounding neighbourhoods, would be able to achieve the standards of inclusive and accessible design as required by the London Plan and, on balance, it would not impact upon the visual amenities of the area to a significantly harmful degree, particularly when weighed against the need for this type of education provision in the area.

### **Impact on residential amenity**

Policy BE1 of the UDP seeks to protect existing residential occupiers from inappropriate development. Issues to consider are the impact of a development proposal upon neighbouring properties by way of visual impact, general noise and disturbance and traffic and parking impacts.

The development itself would be well-separated from any existing residential development and is very unlikely to have a significant visual or noise impact on occupiers of dwellings to the south-west of the site beyond the adjacent Langley Park Sports and Social Club, given the separation distances and the dense tree and shrub planting which runs alongside the railway track to the rear of these properties. Similarly, properties to the south and to the east in Wickham Way are also unlikely to be unduly impacted by the development.

There are no residential uses along Hawksbrook Lane itself however there are a substantial number of concerns from local residents regarding the impact of the proposed new school on the wider highways network. These are considered in more detail below.

### **Parking and cycling provision and Highways impacts**

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

London Plan and UDP Policies encourage sustainable transport modes whilst recognising the need for appropriate parking provision. As set out above, a proposal for development that meets an identified education need 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 and proposals relating to primary schools that are likely to be used by the wider community will also be required to produce and adopt a School Travel Plan.

In addition, the Draft Local Plan also supports proposals for new schools provided there are no significant highways impacts which substantially outweigh the need for additional education provision and which cannot be addressed through planning conditions or obligations. Any new development likely to be a significant generator of travel will also be required to incorporate or contribute to improvements to the highway network including traffic management measures that limit significant impacts of the development and are designed to be sensitive to the surroundings.

It is anticipated that eventually pupil numbers at the proposed school will reach 420 in 2022 with up to 30 members of staff. The increases will occur gradually with two new forms of entry each year moving through the school. The school is due to relocate from its temporary premises in September 2018.

In terms of sustainable transport modes, the site has a low PTAL rating of 1b with one bus route available from Wickham Way, 500m from the site and West Wickham station located approximately 1km to the south east of the site, however, not considered to be within a reasonable walking distance from the site. Whilst it is acknowledged that there are limited public transport modes available in the area, given the school's catchment area, walking and cycling should be promoted as a key travel option for staff and pupils.

Accordingly, the applicant has provided cycle parking in line with London Plan standards as well as scooter parking (the number of spaces of which is to be confirmed). The applicant has also produced a Travel Plan which has been updated to incorporate the STARS system and this would evolve over the lifetime of the schools to promote and support a range of measures to encourage parents and their children to travel to the school site by sustainable means. It is therefore considered that the proposal has succeeded in taking up opportunities for sustainable transport modes and the school would be readily accessible to those in its intended catchment area. The evolving nature of the Travel Plan will ensure that future reliance on private car use for both pupils and staff is both monitored and deterred as the school capacity increases to its maximum.

Nevertheless, a significant number of local objections have been received with regard to the impact of the proposed new school on highways safety and parking in the area, particularly given the applicant's assertion that a high proportion of pupils will travel to the school by car. The impact on parking in the surrounding road network has therefore been assessed. The results show little to no spare capacity for vehicles to park on Hawksbrook Lane, particularly during the AM peak. A parking survey was also carried out for the existing car park adjacent to the MUGA co-owned by Langley Girls School and the Hockey Club. However, this appears to be a private car park for permit holders only. The applicant has subsequently clarified that this car park was only used in assessing the staff parking demand as the staff could be issued permits to park there in the event that this was required. However, subsequent to the submission of the Transport Assessment, instead they

agreed to increase the parking provision on site to meet the staff parking demand of 18 spaces.

In order to help alleviate on-street parking pressure the applicant proposes a dedicated drop-off and pick-up area allowing vehicles to enter the site, drop-off / pick-up and exit in a continuous movement. The Transport Assessment also sets out a parking management strategy for the school which includes deterring staff and parents/carers from parking on Hawksbrook Lane and identifying issues early on to inform the future management strategy. The drop-off/pick-up area will also be monitored by staff during the morning and afternoon arrival and departure times to enforce best practices and reduce dwell times to ensure maximum throughput of vehicles can be achieved.

The Council's Highways Officers agree that this is an acceptable approach and provided the management plan is implemented and the measures set out within the Travel Plan are adhered to, including continuous monitoring, it is not anticipated that the proposal would have an unduly harmful impact on on-street parking in the area.

A junction assessment has also been carried out which takes into account the traffic generated by the 2 existing senior schools and social club which currently utilise Hawksbrook Lane as well as that generated by the proposed primary school. While junction capacity and queue length are predicted to remain under full capacity until the school reaches maximum occupation in 2022, once it is fully occupied the junction is predicted to be over maximum capacity resulting in queue lengths close to the 100m distance from the junction to the first car park access point.

However, it is noted that the trip generations assessments do not allow for car sharing by pupils, with all trips by car being considered as a single pupil trip. In reality a number of pupils will be siblings of other pupils at the school, and also potential siblings of pupils attending the existing Langley Park girls or boys schools. Furthermore, Hawksbrook Lane does not provide a through-route and no residential properties are served by this road. On balance, while the development is likely to result in increased congestion along Hawksbrook Lane, it is not anticipated that queues will significantly impact on the wider road network.

Having regard to the above, while it is clear that the proposed school, together with the existing schools and social club will put a strain on the capacity of the surrounding road network, the applicant has set out a comprehensive range of measures designed to help mitigate the potential impacts which can be secured through conditions. On balance, having regard to the presumption in favour of sustainable development to meet educational need and considering the mitigation measures proposed by the applicant, the highways impacts of the development are not considered to be so significant to warrant the refusal of the application on highways grounds.

Car parking, cycle parking and refuse storage conditions are recommended. A condition to secure the development and implementation of the Travel Plan is also recommended.

## **Sustainability and Energy**

London Plan Policies 5.1 - 5.7 refer to energy requirements to achieve climate change mitigation including reduction in carbon emissions and renewable energy. The applicant has revised their energy strategy and has calculated that, in order to satisfy the 35% target above that of the 2013 Building Regulations, approximately 129m<sup>2</sup> of Photovoltaic panels. Details of the siting and appearance of these will need to be subsequently submitted to and approved by the Council should permission be granted. A condition is recommended accordingly.

## **Flooding and Drainage**

The application site is not within a flood zone as defined by the Environment Agency. However, policy 5.13 of the London Plan requires developments to utilise sustainable urban drainage systems (SUDS), unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water is managed as close to its source as possible in line with the hierarchy in policy 5.13. The supporting text to policy 5.13 also recognises the contribution 'green' roofs can make to SUDS.

The applicant submitted an amended drainage strategy on 28/09/17 which reduces the discharge rate of surface water to 3.8L/s, providing enough storage for the 1 in 100 year storm event + Climate Change. They state that while there is some minor flooding in the car park for the more extreme events this will be less than 150mm depth. This is considered acceptable in principle subject to the submission of a detailed surface water drainage strategy should the development being considered acceptable overall. A drainage condition is recommended accordingly.

## **Pollution and Contamination**

The planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate (Para.109, NPPF).

The applicant submitted an Air Quality Assessment, a Contaminated Land assessment and a Noise Assessment to support this proposal. A Heating Strategy and a Remediation strategy in relation to contaminated land were subsequently provided. The use of natural gas as a fuel and the proposed discharge flue are satisfactory for the heating of the school. However the proposed Remediation Strategy relating to contaminated land is considered inadequate and a condition is recommended requiring the submission of a further strategy should permission be granted. This should include additional sampling and gas monitoring.

In terms of Air Quality the proposal is considered acceptable, subject to the recommendations in the report.

In terms of noise, the noise generated by additional pupils and additional vehicle movements is unlikely to be significant given the site's proximity to the existing schools. Furthermore, there are no adjoining residential properties which are likely to be unduly impacted by noise. A condition is recommended requiring a further Noise Impact Assessment be carried out in relation to fixed plant.

### **Impact on Heritage Assets**

The NPPG, at paragraph 128 says that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. Furthermore, where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset (Para 135, NPPF).

Similarly, London Plan and UDP policies require applicants to identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate and where permanent preservation in situ is not justified, provision shall be made for an appropriate level of investigation and recording to be undertaken by a recognised archaeological organisation before any development commences.

The site is not within an area of archaeological significance; however, the development does have the potential to impact archaeological remains of local significance. Following comments made by Historic England the applicant has submitted a Written Scheme of Investigation (WSI) outlining how any archaeological finds will be recorded and stored. Provided the development is carried out in accordance with the WSI in consultation with Historic England, the development is considered acceptable in that it would not have a significant impact on non-designated heritage assets. A condition is recommended accordingly.

### **Summary and Conclusions**

The assessment above considers the impact of the development on the MOL and whether it constitutes inappropriate development; its impact on openness, loss of playing fields, ecological impacts and any other harm, and whether any very special circumstances exist which outweigh the resultant harm.

It is concluded that the proposed school would constitute inappropriate development in the MOL and would have an impact on the openness of the site. Harm has also been identified in the form of the loss of playing fields which will result from the development, to which Sport England have raised objections as a statutory consultee.

While there will clearly be highways and parking impacts as a result of the development, due consideration has been given to the comments made by local

residents during the consultation process and the range of measures proposed by the applicant to help reduce the strain on the surrounding road network and promote more sustainable modes of transport have also been taken into consideration. Having regard to the presumption in favour of sustainable development to meet educational need, the highways impacts of the development are not considered to justify the refusal of the application on highways grounds. Furthermore, as Hawksbrook Lane is not a residential road it is not anticipated that the amenities of local residents would be unduly harmed.

It is considered that the development has been sensitively positioned and consideration has been given to its height and scale in order to minimise its visual impact and, on balance, it would not harm the visual amenities of the area to a significant degree, particularly when weighed against the need for this type of education provision in the area. Furthermore, the proposed sustainability measures ensure that the development will be able to achieve compliance with the Mayor of London's Climate Change Mitigation and Energy Strategy.

Trees, ecology, protected species, archaeology, drainage and pollution have also been considered and the proposal is unlikely to have any significantly adverse impacts subject to the recommendations made in the accompanying reports and the submitted plans being adhered to.

In this instance, the need for additional school places in the Borough is afforded substantial weight and it has been demonstrated that there are no suitable alternative sites to accommodate the school. The proposal would deliver the necessary education infrastructure to meet a demonstrated need and would provide a range of sports facilities which would be available for community use and would be accessible to residents. In the overall balance, it is concluded that these factors clearly and demonstrably outweigh the harm to MOL by reason of inappropriateness, together with the harm to openness and the visual amenities of the MOL, together with the other harm identified within this report, resulting in very special circumstances.

Should Members be minded to grant permission the application will need to be referred to the Secretary of State in accordance with Section 3(a) of the Town and Country Planning (Consultation)(England) Direction 2009 in respect of playing field development.

This application must also be referred to the Mayor before determination in accordance with the request of the GLA in its Stage One Response (referable under Category 3D - development on land allocated as Metropolitan Open Land which would include construction of a building with a floor space of more than 1000 sqm).

Background papers referred to during production of this report comprise all correspondence on the file refs 17/01652 set out in the Planning History section above, excluding exempt information.

as amended by documents received on 20.04.2017 28.04.2017 04.05.2017  
09.06.2017 27.06.2017 12.07.2017 04.08.2017 07.08.2017 25.08.2017 31.08.2017  
06.09.2017 13.09.2017 15.09.2017 28.09.2017

**RECOMMENDATION: PERMISSION (SUBJECT TO ANY DIRECTION BY THE  
MAYOR OF LONDON OR SECRETARY OF STATE)**

Subject to the following conditions:

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

Reason: Section 91, Town and Country Planning Act 1990

- 2 The development hereby permitted shall not be carried out otherwise than in complete accordance with the plans and documents listed in this condition unless previously agreed in writing by the Local Planning Authority:

Site wide plans/elevations/sections/floor plans:

LPPS-PE-XX-ZZ-DR-A-0200 REV P01; LPPS-PE-XX-ZZ-DR-A-0201 REV P01; LPPS-PE-XX-00-DR-A-1200 REV P11; LPPS-PE-XX-01-DR-A-1201 REV P10; LPPS-PE-XX-ZZ-DR-A-1804 REV P02; LPS-ALA-00-XX-DR-L-0005 REV P02; FS0442-PEV-XX-02-DR-A-1202 REV P08; LPPS-PE-XX-ZZ-DR-A-3100 REV P07; LPPS-PE-XX-ZZ-DR-A-4100 REV P04; FS0442-PEV-XX-ZZ-DR-A-5210 REV P01; LPS-ALA-00-XX-DR-L-0006 REV P02

Landscaping/fencing/pitch layouts: FS0442-ALA-00-XX-DR-L-0001 REV P01; FS0442-ALA-00-XX-DR-L-0012 REV D1-P02; FS0442-ALA-00-XX-DR-L-0013 REV D1-P01; FS0442-ALA-00-XX-DR-L-0014 REV D1-P01 ; FS0442-ALA-00-XX-DR-L-0015 REV D1-P03; FS0442-ALA-00-XX-DR-L-0016 REV D1-P02; FS0442-ALA-00-XX-DR-L-0017 REV D1-P01; FS0442-ALA-00-XX-DR-L-0018 REV D1-P02; FS0442-ALA-00-XX-DR-L-0019 REV D1-P01; FS0442-ALA-00-XX-DR-L-0020 REV D1-P02; FS0442-ALA-00-XX-DR-L-0021 REV D1-P01; FS0442-ALA-00-XX-DR-L-0022 REV D1-P02; FS0442-ALA-00-XX-DR-L-0023 REV D1-P01; FS0442-ALA-00-XX-DR-L-0024 REV D1-P01; FS0442-BWB-GEN-XX-DR-C-600 D2 REV P01; FS0442-BWB-GEN-XX-DR-C-700 D2 REV P01; FS0442-BWB-GEN-XX-DR-C-720 D2 REV P01; LPS-ALA-00-XX-DR-L-0003 REV P04; LPS-ALA-00-XX-DR-L-0010 P02; FS0442-BWB-GEN-XX-SP-C-0002; LPS-ALA-00-XX-DR-L-0010 REV P02; FS0442-ALA-00-XX-DR-L-0031 S2 P01



Heating Strategy/mechanical plant: FS0442-RPS-00-GF-M2-N-5601S4 REV P02; FS0442-RPS-00-01-M2-N-5602 S4 REV P02; FS0442-RPS-00-XX-DR-N-5901 S4 REV P02; FS0442-RPS-00-XX-DR-N-5001 S4 REV P02

Lighting: LPPS-RPS-00-XX-DR-E-6303 S4 P3

**Reports:**

**Air Quality Assessment:**

AQ\_assessment/2017/Langley\_Park\_2017update;

Arboricultural Impact Assessment: 2617,AR/ARB/RF,AS/03-08-17/V1;

Archaeological Desk Based Assessment: AB/22650;

Construction Logistics Plan (June 2017);

Ecological working method statement: 2622,EC/EWMS/AS,KML/28-07-17/V1;

Energy Statement: FS0442-RPS-00-XX-RP-N-0013-S4-P03;

Environmental Noise Impact Assessment: ADT 2305;

External Works Specification: FS0442-BWB-GEN-XX-SP-C-0002;

Flood Risk Assessment: 1959,GI,FR/FLOOD/PC,SG/05-10-16/V5;

Heating Strategy Rev P02;

Phase 2 Ground investigation Report: 1959,GI/DJB,SG/26-10-16/V1;

Preliminary Ecological Assessment: (April 2016);

Remediation method statement: 2704,RS/RMS/TP,PD/24-08-17/V1;

Transport Assessment Technical Addendum: LPA-BWB-GEN-XX-RP-TR-0004-S3-P01;

Travel Plan: LPA-BWB-GEN-XX-RP-TR-0003 REV P02;

Written Scheme of investigation for Archaeological Monitoring (Aug 2017).

**REASON:** In order to comply with Policies BE1, BE16, C7, ER7, C8, G2, L6, NE2, NE3, NE5, NE7, NE12 and T18 of the Unitary Development Plan, the London Plan and the NPPF and in the interests of achieving sustainable development, the appearance of the development, promoting sustainable transport and healthy communities, conserving and enhancing the natural and historic environment and the residential and visual amenities of the area.

- 3** Prior to commencement of development, a detailed surface water drainage scheme for the site, based on the agreed Revised Surface Water Strategy (by BWB Consultancy) dated 28/09/2017 shall be submitted to and approved in writing by the Local Planning Authority. The drainage strategy shall include surface water storage on site as outlined in the submitted "Proposed Drainage Strategy Layout" Plan DRW No. FS0442-BWB-GEN-XX-DR-C-500 S2 Rev P03, Micro Drainage Calculations carried out by BWB Consultant dated 28/09/2017 and permeable paving as indicated in drawing FS0442-BWB-GEN-XX-DR-C-720 S2 P02 dated 13/09/2017. The scheme shall contain the detailed design of the proposed storage tank and shall include details of maintenance programme for all sustainable drainage systems, including timeframes for the planned

**maintenance measures and confirmation of the maintenance provider. The scheme shall be implemented in accordance with the approved details prior to first occupation of the development hereby approved, and thereafter permanently retained and maintained unless otherwise agreed in writing with the Local Planning Authority.**

**REASON: To prevent flooding by ensuring the satisfactory management of surface water run-off from the site in accordance with policy 5.13 of the London Plan.**

- 4 Details of the design and layout of the westward extension of Hawksbrook Lane and the proposed turning area (including its junction with Hawksbrook Lane), including their levels, suitability for the movement of cars and vans and the dimensions of visibility splays (the Section 278/ 38 works) shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of the development. The access, turning area and extension of Hawksbrook Lane shall be completed before any part of the development hereby permitted is first occupied. There shall be no obstruction to visibility in excess of 1m in height within the approved splays except for trees selected by the Authority, and the permitted visibility splays shall be permanently retained as such. The works shall be implemented, maintained and managed in accordance with the approved details unless otherwise agreed in writing with the Local Planning Authority.**

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

- 5 Before construction work commences a Remediation Method Statement shall be submitted to the Local Planning Authority for approval. Additional sampling and gas monitoring shall be carried out in accordance with the recommendations of the Geosphere Report of October 2016.**

**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.**

- 6 No site clearance or development shall take place other than in complete accordance with the recommendations within the Ground Investigation Report by Geosphere (Oct 2016).**

**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.**

- 7 The development shall be carried out in complete accordance with the Construction Logistics Plan by B&K Building Services dated**

**20th June 2017. The Construction Logistics Plan shall be implemented in accordance with the agreed timescale and details.**

**REASON: In order to comply with Policy T5, T6, T7, T15, T16 & T18 of the Unitary Development Plan and in the interest of the amenities of the area.**

- 8 For land that is included within the Archaeological Written Scheme of Investigation (WSI), no demolition or development shall take place other than in accordance with the agreed WSI by PSA dated Aug 2017. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material shall be carried out in complete accordance with the approved details. The written scheme of investigation will need to be implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.**

**REASON: In order to comply with Policy BE16 of the Unitary Development Plan and in the interest of the archaeological and historic interest of the area.**

- 9 The development hereby permitted shall be carried out in complete accordance with the survey, mitigation and biodiversity enhancement recommendations outlined in the Ecological Appraisal document and Working Method Statement accompanying the application which shall include temporary amphibian fencing being placed along the boundaries of the construction zone for the duration of the works and guidance for contractors given by a suitably qualified ecologist prior to groundworks and vegetation clearance commencing. Any deviation from these recommendations shall be submitted to and approved in writing by the Local Planning Authority prior to development commencing.**

**REASON: In order to comply with Policies NE3 and NE5 of the Unitary Development Plan and in order to safeguard the interests and well-being of Great Crested Newts on (or adjacent to) the site which are specifically protected by the Wildlife and Countryside Act 1981 (as amended) and in the interest of any other protected species using (or adjacent to) the site.**

- 10 The development shall be implemented in accordance with the Arboricultural Method Statement and Tree Protection Plan submitted and approved as part of the planning application and 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 and to comply with Policy NE7 of the Unitary Development Plan.

- 11 The development hereby permitted shall be carried out strictly in accordance with the slab levels shown on drawing FS0442-BWB-GEN-XX-DR-C-600 D2 P01.

**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.

- 12 The development hereby permitted shall be carried out in complete accordance with the Energy Statement by Bowmar & Kirkland (FS0442-RPS-00-XX-RP-N-0013-S4-P03) (July 2017) including the provision of Photovoltaic panels on the roof of the building in accordance with details of their scale and appearance (including drawings showing sections through the roof of the building) which shall be submitted to and approved in writing by the Local Planning Authority prior to any development above ground floor slab level. The approved details shall be implemented prior to first occupation and shall be retained thereafter in operational working order.

**REASON:** In the interest of the visual amenities of the area and in order to seek to achieve compliance with the Mayor of London's Climate Change Mitigation and Energy Strategy and to comply with Policy BE1 of the UDP and policies 5.2, 5.3 and 5.7 of the London Plan.

- 13 Details setting out the measures proposed to prevent light spillage from the lighting scheme as set out in drawing LPPS-RPS-00-XX-DR-E-6303 S4 P3 into the boundary areas so as to avoid adversely affecting bats shall be submitted to and approved in writing by the Local Planning Authority before any work above ground floor slab level is commenced. The lighting shall be installed in accordance with the approved details and no further lighting shall be installed on the site without the prior approval in writing by the Local Planning Authority.

**REASON:** In order to comply with Policy ER10 of the Unitary Development Plan and in the interest of the visual and residential amenities of the area.

- 14 Details of the materials to be used for the external surfaces of the building shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of any development above ground floor slab level. The works shall be carried out in accordance with the approved details.

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

- 15 Details of the windows (including rooflights and dormers where appropriate) including their materials, method of opening and drawings showing sections through mullions, transoms and glazing bars and sills, arches, lintels and reveals (including dimension of any recess) shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of any development above ground floor slab level. The windows shall be installed in accordance with the approved details.

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

- 16 A scheme for landscaping, which shall include details of all proposed hard surfacing, means of enclosure, lighting columns, bollards and any other street furniture shall be submitted to and approved in writing by the Local Planning Authority before any work above ground floor slab level is commenced. The development shall be carried out in accordance with the approved details.

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

- 17 Details of the location, height, appearance and materials of any proposed fencing, including around the approved games courts, shall be submitted to and approved in writing by the Local Planning Authority before any work above ground floor slab level is commenced. The development shall be carried out in accordance with the approved details.

**REASON:** In order to comply with Policy BE1, BE7 and G2 of the Unitary Development Plan and to secure a visually satisfactory setting for the development.

- 18 Before the use commences the applicant shall carry out a Noise Impact Assessment in accordance with BS.4142:2014 to ensure a level difference of at least 10dB(A) between the Rating Level and the relevant background noise level when measured at any nearby noise-sensitive building. An assessment shall be carried out of all fixed plant and submitted to the Local Planning Authority. Once approved in writing all recommended mitigation works shall be carried out in full and permanently maintained thereafter.

**REASON:** In the interests of amenity and to accord with policy 7.15 of the London Plan.

**19** Before commencement of the use of the land or building hereby permitted parking spaces and turning space shall be completed in accordance with the approved details and thereafter shall be kept available for such use and no permitted development whether permitted by the Town and Country Planning (General Permitted Development Order 1995 (or any Order amending, revoking and re-enacting this Order) or not shall be carried out on the land or garages indicated or in such a position as to preclude vehicular access to the said land or garages.

**REASON:** In order to comply with Policies T3 and T18 of the Unitary Development Plan and to avoid development without adequate parking provision, which is likely to lead to parking inconvenient to other road users and would be detrimental to amenities and prejudicial to road safety.

**20** Prior to the commencement of the use hereby permitted, a Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan should include measures to promote and encourage the use of alternative modes of transport to the car. It shall also include a timetable for the implementation of the proposed measures and details of the mechanisms for implementation and for annual monitoring and updating. The Travel Plan shall be implemented in accordance with the agreed timescale and details.

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

**21** Use of the development shall not commence until a community use agreement for the School Hall, MUGA (hard surface playground) and the games courts to the south of the school hereby permitted prepared in consultation with Sport England and local sports clubs 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 include details of both the exclusive and shared areas within the school premises (indoor and outdoor, including car parking) that will be used as the "community facilities", together with pricing policy, hours of use, access by non-educational establishment users, management responsibilities and a mechanism for review (and anything else which the Local Planning Authority in consultation with Sport England considers necessary in order to secure the effective community use of the facility). The development shall not be used at any time other than in strict compliance with the approved agreement.

**REASON:** To secure well managed safe community access to the sports facility/facilities, to ensure sufficient benefit to the development of sport and to accord with Development Plan Policy including policies 3.16 and 3.19 of the London Plan

**22** 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 of the Unitary Development Plan and policy 6.9 of the London Plan and in order to provide adequate bicycle parking facilities at the site in the interest of reducing reliance on private car transport.

**23** Details of a parking management strategy for the car park and drop-off/pick-up areas, which shall include details of the hours of operation, shall be submitted to and approved in writing by the Local Planning Authority before any part of the development is first occupied. The management scheme shall be implemented in accordance with the approved scheme at all times unless previously agreed in writing by the Authority.

**REASON:** In order to comply with Policies T3 and T18 of the Unitary Development Plan and to avoid inconsiderate parking which would inconvenience other road users and would be detrimental to amenities and prejudicial to road safety.

**24** Details of arrangements for storage of refuse and recyclable materials (including means of enclosure for the area concerned where necessary) shall be submitted to and approved in writing by the Local Planning Authority before any part of the development hereby permitted is completed and the approved arrangements shall be implemented in full before any part of the development hereby permitted is first occupied, and permanently retained thereafter.

**REASON:** In order to comply with Policy BE1 of the Unitary Development Plan and in order to provide adequate refuse storage facilities in a location which is visually acceptable.

**25** Prior to the first occupation of the development hereby approved details shall be submitted to the Local Planning Authority and the Metropolitan Police SE Designing Out Crime Office setting out how the principles and practices of the Secured by Design Scheme have been adhered to. Once approved in writing by the Local Planning Authority the development shall be completed in accordance with the agreed details. The appropriate Secured by Design (SBD)

requirements can be found in the design guides on the SBD web site ([www.SecuredbyDesign.com](http://www.SecuredbyDesign.com)).

**Reason:** In the interest of creating safer, sustainable communities and to accord with Policy BE1 of the Unitary Development Plan.

**26** The approved planting and soft landscaping scheme shall be implemented in the first planting season following the first occupation of the buildings or the substantial completion of the development, whichever is the sooner. Any trees or plants which within a period of 5 years from the substantial completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species 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.

**27** There shall be no floodlighting provided at the site without the written approval of the Local Planning Authority.

**REASON:** In order to comply with Policies BE1, ER10 and NE5 of the Unitary Development Plan and in the interest of the amenities of nearby residential properties and protected species.

**28** No structure, plant, equipment or machinery shall be placed erected or installed on or above the roof or on external walls without the prior approval 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 appearance of the building and the visual amenities of the area.

You are further informed that :

**1** Before works commence, the Applicant is advised to contact the Pollution Team of Environmental Health & Trading Standards regarding compliance with the Control of Pollution Act 1974 and/or the Environmental Protection Act 1990. The Applicant should also ensure compliance with the Control of Pollution and Noise from Demolition and Construction Sites Code of Practice 2008 which is available on the Bromley web site.

**2** 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. The contact number is 0800 009 3921. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

- 3 Legal changes under The Water Industry (Scheme for the Adoption of private sewers) Regulations 2011 mean that the sections of pipes you share with your neighbours, or are situated outside of your property boundary which connect to a public sewer are likely to have transferred to Thames Water's ownership. Should your proposed building work fall within 3 metres of these pipes we recommend you email us a scaled ground floor plan of your property showing the proposed work and the complete sewer layout to [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk) to determine if a building over / near to agreement is required.
- 4 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. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing [wwriskmanagement@thameswater.co.uk](mailto:wwriskmanagement@thameswater.co.uk). Application forms should be completed on line via [www.thameswater.co.uk/wastewaterquality](http://www.thameswater.co.uk/wastewaterquality).
- 5 Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.
- 6 Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
- 7 You should consult Street Naming and Numbering/Address Management at the Civic Centre on 020 8313 4742, email [address.management@bromley.gov.uk](mailto:address.management@bromley.gov.uk) regarding Street Naming and Numbering.