

Development Control Committee 4th October 2017

Item 5.1 – St Hughes Playing Fields – Addendum to Report

Two changes to the published report are set out below.

These changes do not affect the recommendation to refuse as set out in the report.

Change 1: Page 88 (printed agenda) – section headed ‘Conclusion’:

Delete the following text:

“The views of the Council's Highway Engineer are that the proposal will result in severe impacts on the highways network both in terms of capacity and flow, and also pedestrian safety, thus making the proposal contrary to Policy T18 of the UDP and paragraph 32 of the NPPF. The applicant has not demonstrated that the residual cumulative impact of the development will fall short of severe as outline in para 32 of the NPPF and the application should be refused.”

And replace with:

“The applicant has not demonstrated that the residual cumulative impact of the development will fall short of severe as outlined in paragraph 32 of the NPPF and the development is contrary to Policy T18 of the UDP”

Change 2: Pages 82 and 83 (printed agenda) – section headed ‘Acoustic Assessment’:

Delete the following text:

“The noise levels will comply with relevant standards and the impact of noise from the car park and usage of the external areas is expected to be minor adverse in the short term, reducing to negligible in the long term. It is confirmed that all the potential noise issues could be controlled through appropriate conditions in accordance with policy 7.15 of the London Plan.

The report does not, however, address noise from the school and site and its impact on local residents and their amenities which requires consideration however it is noted that the site is allocated as a school site therefore significant weight is given to this and any noise from the site can be adequately controlled through the submission of a noise management plan which would be conditioned should permission be forthcoming in order to comply with the requirements of Policy 7.15 of the London Plan.”

And replace with:

“The noise levels will comply with relevant standards and the impact of noise from the car park and usage of the external areas is expected to be negligible. The Council’s Environmental Health Officer raises no objections subject to suitable conditions being imposed should permission be forthcoming.”

Application No : 17/02468/FULL1

Ward:
Bickley

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

OS Grid Ref: E: 541958 N: 169210

Applicant : Kier Construction (Southern)

Objections : YES

Description of Development:

Proposed erection of a 6FE Secondary Boys School comprising a part 2 storey, part 3 storey school building of 8,443m² including a sports hall (also for wider community use) together with hard and soft landscaping, creation of a new vehicular access on Chislehurst Road, 69 parking spaces, drop off/pick up area and associated works. Erection of a temporary 2 storey classroom block on site for 12 months to accommodate 5 classrooms, a laboratory, offices and toilets (amended submission of application DC/16/03315/FULL1).

Key designations:

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

Proposal

The proposed development is the provision of a new 6 Form Entry (FE) boys secondary school on the 4.69ha site, to accommodate up to 900 pupils. The age of the boys is to be 11-16 and no sixth form entry is being proposed. The application is a re-submission of that refused under application reference 16/03315/FULL1. The amendments made to this application are as follows:

- Changes to the Chislehurst Road access including insertion of safety railings and new pathway (approximately 17m in length and 1.8m in width) and raised table crossing.
- 15 additional drop off bays in the car park (cumulatively 20 in the main car park and 5 next to the Chislehurst Road entrance)
- Changes to the coach access (coaches will now enter the site)

As well as the proposed physical amendments, the TA, and subsequent information received also includes additional assumptions about trip generation and modal split which differ from the original scheme. Other changes have been made to the supporting information to reflect the current scheme.

Other than the changes laid out, the development remains as previously proposed and comprises the following elements:

Building and Works

- New split level school building of up to 3 storeys in height of 6770sqm
- Building will comprise main hall, dining hall, library, internal atrium, 39 teaching spaces and associated facilities
- Two storey Sports Hall including an activity studio which will also be available for community use (18m x 133m)
- Single entrance to building from Chislehurst Road
- Modern elevational treatment - grey brick to ground floor and some parts of the elevations of the building and a cladding system to the upper elevations in a mix of green, blue and grey panels, used horizontally and vertically
- PV panels to the roof
- Hard surfaced outdoor play areas around school building
- 2 hardstanding enclosed ball/games courts adjacent to school building
- Demolition of existing Pavilion and Cadet's Hut
- Relocation of Air Force Cadets to girls school site during construction and use of school building once completed
- Retention of the majority of the existing playing fields and trees on the site (additional tree removal is proposed compared to the previous scheme)
- Sports pitches to include 2 full sized pitches including a rugby union pitch, use for Football u13, Hockey and Lacrosse, in addition a 8 lane 100m running track and long jump pitch retained
- Separate bin store/delivery bay off Chislehurst Road including turning head
- Substation adjacent to Chislehurst Road

Access arrangements

- New primary vehicular and separate pedestrian access off Chislehurst Road with gates and welded mesh fencing. The pedestrian crossing will provide direct access to a new raised crossing via a new stretch of footway measuring 17m (with guard railing) along the south side of Chislehurst Road.
- Keep clear markings to be made on Chislehurst Road for 40m to the west and 67m to the east of the new access
- New pedestrian access off Bickley Road
- One-way system through site
- Access and car parking with dedicated drop off area for 25 cars
- Reuse of existing vehicular exit off Bickley Road with new speed cushion and 'keep clear' signage
- Main car park next to entrance for 11 visitor spaces inc. 5 DDA spaces
- Staff car parking area for 58 spaces also to be used for water attenuation
- Capacity for 50 vehicles to queue on the access road within the site
- Overflow car parking on games courts for events of up to 80 spaces

- 36 cycle storage spaces in two locations and potential for a further 120 spaces if required.
- Construction access route from Chislehurst Road

Temporary development

A two storey temporary mobile classroom building is also proposed and is to be sited close to Bickley Road and is proposed for a one year period (commencing September 2018). It is expected that this structure will be in place for a one year period. This element includes:

- Two storey grey prefabricated temporary building 31m x10m
- Height of temporary building will be approximately 7m
- Comprising 5 classrooms, science laboratory, offices and toilets
- To accommodate 180 pupils and associated staff
- Building to be removed after completion of the main school building
- Provision of security fencing and temporary access gates
- Sited on proposed permanent staff car parking area
- Permanent parking area, upgrading of access drive, turning area and new pedestrian access to be implemented as part of the temporary accommodation
- Vehicular access from Bickley Road to be used for access and egress during school collection/drop-off hours
- Parking for staff and visitors - 9 spaces and a drop off area for 15 spaces including turning space
- Use of remaining hard surfaced area for outdoor play
- Use of existing playing fields throughout

The previous application ref: 16/03315/FULL1 is currently subject to a written representations appeal which started on the 21st September.

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

Planning Statement (May 2017): The statement sets out the overall policy background and identifies the planning considerations relevant to the application. It sets out the application and its background, the proposal being set out and the educational need for the school. It identifies the key planning considerations and concludes that the proposal has been amended following the previous reasons for refusal and that the development is sustainable and that all relevant material considerations have been addressed.

Alternative Site Selection Report (November 2016): This identifies a wide number of potential sites and each have been considered in terms of their suitability. This includes residential sites, employment sites and sites within the MOL and GB. No sites have been identified as preferably more suitable for the construction of a new school.

Design and Access Statement (May 2017): This document covers a wide range of aspects in relation to the proposed design and access arrangements to the building

and site. It addresses the background, site analysis, proposed development including an assessment of the visual impact of the proposal and impact on the street scene, building and site access and circulation, appearance, landscaping and materials in all respects. The detailed aspects of the temporary accommodation are outlined and discussed and also the sports pitches and their provision.

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

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

Statement of Community Involvement: Consultation was under with the Borough Council, local residents and local Ward Councillors. A Members Briefing was held at Bullers Wood School for Girls on the 15th May 2017. A public exhibition was held on Wednesday 17th May 2017 at Bullers Wood School for Girls. Prior to the event a poster was displayed at the site and advertised on the school website, 700 leaflets were also distributed and copies sent to the Ward Councillors within the same area as the previous application. Formal written feedback was not sought given the extensive consultation that had been undertaken by the applicant and council in relation to the previous scheme. The report appends all previous public consultation responses as well as a copy of the exhibition leaflet and exhibition boards.

Transport Statement (May 2017): A detailed Transport Statement has been submitted which includes existing, proposed and predicted traffic flow data and counts, a Stage 1 Road Safety Audit (revised from the previous application), Parking Stress survey, traffic queue length surveys and traffic light timings. It identifies all aspects of the traffic implications of the proposals including vehicular and pedestrian routes and proposals, layouts, parking plans, swept path analysis, public transport availability and measures to minimise the need for the cars and encourage sustainable measures to encourage walking and public transport to the site for pupils and staff. It identifies that the school opening hours will be 7.45 - 14.15 with compulsory enrichment/homework sessions until 15.20 to minimise additional traffic at peak times. Alternative access arrangements and options have also been considered.

Appendix 2

It concludes that a number of access options have been explored in the design process but the chosen solution with a new access from Chislehurst Road and the existing Bickley Road access used for exit purposes only are found to have the least environmental impact, are most technically sound, allows for traffic to be shared across both roads and is the preferred option from a highway engineering and safety perspective given the nearby junctions. Dedicated pedestrian access routes minimise conflict and provide access to public transport connections which will include a puffin crossing and a raised crossing with safety railings along Chislehurst Road adjacent to the proposed entrance. A total of 69 car parking spaces are proposed, 36 cycle spaces, 20 vehicle drop off/pick up area and capacity for 50 cars on the site access road. All access points into the site can accommodate the appropriate size of vehicle, including service vehicles which can all turn on site. Therefore all vehicles can be accommodated on site and there is no need for parking on public highways.

Proposed traffic levels have been identified and sourced from staff and pupil levels and modal splits at the Girls School in March 2017 and it is estimated that 156 additional trips in the AM peak hour and 67 in the PM peak hour are proposed when taking into account measures in the Travel Plan. Whilst the junction modelling shows that 3 local junctions exceed their theoretical capacity in future year scenarios, the impact of the development traffic is minimal when compared to the base traffic flows and is not considered to be severe in accordance with paragraph 32 of the NPPF. Additional 55 rail trips, 209 bus trips are identified and there is capacity to accommodate these additional trips. The temporary accommodation will be served by 9 parking spaces, a 15 space drop-off/pick-up area, turning area and the use of Bickley Road for access and exit purposes during the use of the temporary accommodation. This part of the site will be fenced off from the construction site.

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

Amendments to the Transport Assessment were submitted on the 16th August 2017 which included a Highways technical note and revisions to the appendices. The technical note covers queries relating to matters raised by the Council in the consideration of the application including the Girls School sixth form capacity, travel survey data, car mode share reduction, breakfast club attendance, bus route capacity etc. Following this a final highways response was provided on the 14th September again providing a response to queries raised by Officers which covers matters concerning Park and Stride data, catchment area, pedestrian crossing on Chislehurst Road, queue lengths and car park management.

Draft Travel Plan (May 2017): The plan aims to minimise the impacts of the school on the surrounding environment with regard to vehicle trips and congestion. The objectives include the increased use of public transport and walking by both pupils and staff. The report promotes a reduction in car use from 26.7% to 18% over a five year period and an increase from 41.8% to 51% of pupils who walk. The report

identifies walking, cycling and public transport initiatives and measures to reduce staff travelling by car. The report is based on the travel patterns at the girls school nearby and is initially set out for a 5 year period. The report is an ongoing strategy to encourage sustainable travel and will be regularly monitored with surveys every 6 weeks. The plan will be managed by the school with a travel plan co-ordinator appointed and a Steering group set up to include members of the community.

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

Highways Feasibility Report (May 2017): This document summarises the highways, traffic and construction issues raised in the previous application and outline how these have been addressed for this application. The report aims to provide highways updates showing the scheme development and how the applicant has reached the conclusion to the highways solution.

Arboricultural Report (May 2016): The site is covered by a Tree Preservation Order and still shows signs of its past use, mainly by the trees present as the size and species show that they were landscape features of the manor house which used to be located on the site. This includes an avenue of pollarded Lime trees and established tree groups. A total of 90 individual trees, 16 groups and 1 woodland are the subject of the report which has been undertaken in accordance with BS 5837:2012. 15 individual trees have been categorised as 'A' grade trees of high quality and value, 54 individual trees, 8 groups and 1 woodland have been categorised as 'B' grade of moderate quality and value. 21 individual trees and 8 groups have been categorised as 'C' grade trees of low quality and value. C grade trees should not pose a constraint to development.

Arboricultural Impact Assessment (June 2016): 5 B grade trees, a section of 1B grade group, a section of 1 B grade woodland, 5 C grade trees and 1C grade group will be removed to facilitate development and the impact to amenity should be minimal. Root protection zones (RPZ) have been identified and a preliminary tree protection plan has been produced. An Arboricultural Method Statement will be required by condition in order to protect and retain the trees on site. Any works within a RPZ which includes the existing access road, new footpaths should be conducted using a minimal dig methodology and use cellular webbing. An arboricultural officer should be present to oversee works.

Preliminary Ecological Appraisal (April 2017): An appraisal was undertaken to determine the ecological value of the site, its habitats and if there are any protected species on the site. The site is dominated by amenity grassland, with areas of dense scrub habitat, mature tree lines, broad-leaved woodland, hardstanding and non-native boundary hedgerow. The pavilion building and ten onsite trees have potential to support roosting bats. The survey undertaken in 2016 shows that there was no bats emerging from the pavilion and the trees suitable for bat habitation are not to be removed. Small areas of vegetation suitable for reptiles will be removed to facilitate development. Four invasive species are present on site. A small area of suitable reptile habitat that will be lost must be cleared under ecological supervision during April to September; any other vegetation clearance should be undertaken during October to February and will need to be preceded by a bird nesting check. Site enhancement measures include the establishment of a new hedgerow section on the northern boundary, establishment of rough grass margins and the inclusion of bat boxes. Other precautionary measures are advised during construction stages.

Bat Report (August 2016): The survey results observed no bats emerging from the potential bat roosting features and it is unlikely that bats are roosting within the pavilion, a license will not be required for its demolition but ridge tiles should be removed under supervision. Bats are using the site and to ensure the grounds remain suitable for bat foraging and roosting, external lighting shall be minimised wherever possible, especially in the vicinity of boundary vegetation and trees that support features suitable for roosting bats. The lighting scheme will use warm white LED lighting which shall be directed to ground and light spill minimised. Further tree surveys will be required if illumination of any trees and used to inform mitigation and licensing requirements. Enhancement measures should include bat boxes affixed to boundary trees in dark areas. Further tree surveys, if required can be controlled through a condition.

Archaeological Desk-Based Assessment (October 2015): The assessment did not identify any currently known significant archaeological remains, although there is potential for buried archaeological remains to be present, particularly associated with the Widmore estate within the northern part of the site. It is recommended a geophysical survey should be undertaken as a first phase of a staged scheme of evaluation. The results can be used to determine the best location for the proposed works and service trenches and if further works are appropriate. Several tree-lines and wooded areas have been identified within the boundaries of the PDA as qualifying as 'historically important' under the terms of the 1997 Hedgerows Regulations. It is recommended that any changes to these assets be avoided or minimised.

Written Scheme of Archaeological Investigation (May 2017): This outlines a scheme of evaluation to provide a programme and methodology for undertaking the works, the standards to be attained and the procedures for analysis and reporting. The previous report (2015) found that there was relatively low archaeological potential for the area prior to the post-medieval period. The report also found that there was a possibility that much of the footprint of the PDA may have been quarried in the early nineteenth century. In consultation with Historic England Greater London Archaeological Advisory Service (GLAAS), an

archaeological evaluation is considered the most appropriate archaeological response to the proposed scheme, but will be carried out in two phases, the second dependent on the results of the first. The first phase will comprise limited trenching on the site to determine the presence, or not, of any quarries. The second phase would further examine areas shown not to have been quarried.

Flood Risk Assessment (April 2017): Assessment of flood risk and options for surface water drainage. The site is within Flood Zone 1 and therefore is considered to have a low risk from fluvial flooding. Infiltration drainage will be suitable for this site and porous paving within the proposed southern car park area is proposed. This will have the capacity to receive all runoff from the development. Connection to existing foul drainage is proposed.

Report of Ground Investigation (July 2016): In 2015 a Phase 1 - Desk Study and Preliminary Risk Assessment and Phase 2 - Ground Investigation Report was undertaken on site which has been re-submitted as part of this application. The ground investigation comprised windowless sampler boreholes, probes and limited gas monitoring. The preliminary risk assessment and site walkover identified a number of potential contaminant sources and pathways to potential receptors. In summary, there is considered to be a low to moderate risk that a significant source of contamination exists below the site. Pathways by which exposure can occur have been identified, as have receptors that could be adversely affected by contamination exposure.

Phase 1 Desk Study and Preliminary Risk Assessment & Phase 2 Ground Investigation Report (October/November 2015): The preliminary risk assessment and site walkover identified a number of potential contaminant sources and pathways to potential receptors. Therefore it was advised that an intrusive ground investigation to determine the extent of any potential contamination within any groundwater and soil strata was required. A number of exploratory holes were positioned across the site and samples exhibited levels of hydrocarbon contaminants above screening values and a pathway exists to potential receptors. It is therefore considered that a risk to human health is present and further investigation and remedial measures are required. The level of made ground on the site results in a recommendation that a suspended ground floor slab is adopted.

Air Quality Assessment (November 2015): The proposed development lies outside the Air Quality Management Area (AQMA). This assessment is to determine the impact of emissions from road traffic on sensitive receptors. Additional car journeys generated by the development have been considered and will not have a significant impact on local pollutant concentrations. The assessment is in relation to the exposure of occupants of the new development rather than the impact of development.

Predicted concentrations have been compared with air quality objectives and indicate the annual mean NO₂ concentrations are below the objective in the worst case scenario. Concentrations of PM₁₀ are predicted to be within the annual mean objective in 2019. It is encouraged to extend the distance between the

school buildings and outdoor play areas with the A222 road source to reduce exposure of children and school users to elevated pollutant levels.

Environmental Noise Survey and Assessment (May 2017): It details that a daytime noise survey was undertaken on the site to assess the acoustic performance specifications for glazing and façade construction and to assess the proposed ventilation strategy. The site is in a residential area but is affected by road traffic noise especially along Chislehurst Road and Bickley Road. Due to the background noise levels there will no requirement for enhanced acoustic glazing on the main school building, noise levels are expected to be limited to levels which are compliant to known standards when the proposed ventilation strategy of openable windows is implemented. The sports hall will have natural ventilation methods such as louvered openings and wind catchers and will require minimal attenuation. The noise levels will comply with relevant standards providing the ventilation methods described in the report are complied with and the impact of noise from the car park and usage of the external areas is expected to be minor adverse in the short term, reducing to negligible in the long term.

Environmental Report (May 2017): The energy strategy includes energy efficiency measures to minimise the carbon footprint and these measures alone show an improvement to Approved Document (2013) rates of 7%. Further improvements are not feasible within the scope of this development. The strategy has considered the feasibility of a wide range of low and zero technologies. The introduction of PV's is proposed and has the potential to reduce the buildings carbon footprint to a total of 21% below the 2013 requirements. The building has been assessed against the summertime overheating requirements and a combination of increased ventilation rates in summer, night cooling with exposed thermal mass and openable windows all occupied rooms comply with the requirements.

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

Summertime Overheating Report (October 2016): The report details the summertime overheating performance of the proposed development. The building has been designed with openable windows and extensive use of night cooling and solar control glass to reduce summertime temperatures. An evaluation of lifetime weather predications has also been established and mechanical ventilation may be required in the future to some rooms. The report identifies its compliance with London Plan policies and criteria.

Ventilation Statement (July 2016): The report details what mechanical ventilation provision is proposed to serve the school, including preliminary sizes and locations for all fans and ventilation units and the approach to odour control and noise from ventilation plant. It is proposed that provision of attenuators, acoustic rated casing and silencers, and all plant to run at night 4dB lower than daytime limit will be incorporated into the installation of any external ventilation plant.

External Lighting Statement (May 2017): The report details the external lighting provision proposed to illuminate the school site, which includes pedestrian walkways, roadways and car parks. Details of the type of lighting and its location on site are submitted. Roads will be illuminated by LED bollard lighting which limits overspill, car parks with 3m LED column lights and pedestrian pathways by bulkhead lights or low level bollard lighting. These will all be controlled via a photo cell to turn the lights on at dusk and turn them off at dawn, all lighting will be turned off at 22.00 until 07.00.

Frequently Asked Questions (2017): The document addresses some of the questions raised previously as well as listing the consultation process undertaken.

Landscaping Planning Statement (May 2017): The document covers a wide range of landscaping consideration including but not inclusive to: BB103 Area Provision with regard to external space provision, site security and access, sports pitch provision, access and circulation, secure by design, fire strategy, parking and cycle storage etc.

Location

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

The site forms a triangular parcel of land with Bickley Road, Chislehurst Road and Pines Road bordering the site. To the western boundary of the site is a commercial car dealership garage (BMW). To the south eastern corner are a number of large detached dwellings and their respective garden areas which back onto the site. Bickley road is an A road (A222) and Pines Road is a one-way road access from the signalised junction on Bickley Road. The site is situated within PTAL Zone 2-3.

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

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

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

Consultations

Comments from Local Residents

Nearby properties were notified and a significant number of representations (in excess of 1,000) have been received in respect of both objections and support. The split between the representations received is approximately 30% in objection, predominantly from local residential properties close to the site and 70% in support, predominantly from prospective parents of the proposed boys school from a wide area. Due to the high level of letters received in respect of this development it has only been possible to summarise the main comments submitted in both cases.

In addition petitions have been received in objection and support.

Objections

Letters of objection submitted are summarised as follows:

- Efforts should be made to minimise environmental impacts and protect trees and wildlife
- Crossings in the area are dangerous for children
- Road safety and increased risk of accidents
- Congestion in the area is already very bad and roads at capacity
- Parking for the girls school is a big problem and there are a lot of car journeys causing road safety concerns
- Local roads will be used for parking
- Existing pavements are too narrow and dangerous
- Entrance should be on Bickley Road which is wider with transport connections
- Scale of development too great
- Detrimental and severe impact on the area and local residential amenities
- Increase in light, pollution, emissions and air quality
- Noise and in the area will increase esp. from sports hall and playgrounds
- Site is Urban Open Space and should be protected
- Significant increase in traffic especially at peak times
- Construction traffic will have a major impact and routes are to use quiet residential roads
- Loss of trees, wildlife and greenspace
- Pines Road should become 2 way
- Exiting schools cause anti-social problems
- Site is not suitable for a school and too small for a school of this size
- School will not serve the local community
- This is a residential area
- Previous proposals on the site have been turned down by an Inspector due to the loss of valuable open space and trees and the impact on the character and appearance of the local environment

Appendix 2

- More parking on site is required
- Exit onto Bickley Road is unsafe
- Chislehurst Road is too narrow for access and in a dangerous location
- Will affect Conservation Area
- Proposed buildings are not in keeping with the area and contrary of Policy BE1 of the UDP
- It is not possible to create a safe access from either Chislehurst Road or Bickley Road and the application must be refused.
- The conclusions of the revised Transport Assessment show over capacity in all directions indicating the site is not suitable for a school
- The submitted parking stress survey is inaccurate and counts non-existent spaces, it is a high parking stress area not low as being put forward
- A Travel plan to reduce journeys by 10% is not sufficient or acceptable in an area subject to high congestion levels
- There is no parking for construction workers
- The proposal is premature in advance of the Local Plan process and undemocratic
- The proposed school development will materially harm the site, urban open space and local environment and should be refused
- To improve visibility at the proposed access will result in more trees needing to be removed or cut back reducing screening and further tree loss
- Removing traffic islands for construction vehicles causing further highway safety concerns and more dangers for pedestrians
- Park and stride considerations have not been fully assessed or addressed in the reports
- Natural materials should be used for the buildings
- Public transport is already congested and at capacity
- Existing school sites should be extended
- Damage to area from HGV's
- Local residents will also be affected at evenings and weekends
- Parking controls are required and need to be enforced
- No evidence of other school sites considered
- Documents do not prove a need for a school on this site
- Transport assessment states all junctions will exceed capacity this is not acceptable
- There have already been 3 recent accidents at the junction with Pines Road and Chislehurst Road
- An independent traffic report should be commissioned by the Council
- Loss of existing facilities for the girls school
- Shawfield Road should not be used as a construction route
- Large and ugly building proposed
- School should be sited where it has room to expand with suitable infrastructure
- Too many schools in the area
- The application is misleading
- Playing fields should be protected

Appendix 2

- Travel plan is incorrect and will not work in reality, it is not practical
- Construction access should be from the A222
- Pavements in the area are narrow, accidents will occur, these need to be upgraded
- The roads can't cope with another school
- Parking at junctions will cause visibility problems
- Access to residential properties will become a problem
- A crossing will bring traffic to a standstill
- Current traffic levels have not been adequately taken into account
- Illegal parking is already a problem and is dangerous
- Will result in a severe environmental impact affecting everyone
- Why is an unlisted wall being retained at the expense of the wider impact
- Double yellow lines are required
- Where will construction workers park
- Proof of the catchment area is required
- Urban Green space should not be used for a school
- The transport report is of poor quality and is misleading in most respects
- Traffic surveys are not complete
- What about the effect on the quality of life for local residents
- 10 drop-off spaces is inadequate
- Parking problems at the girls school cause major disruption and impact on residents getting to work
- Residents can't cope with more traffic
- Measures to reduce car use won't work
- Early start for children is not appropriate
- There are owls on the site
- All TPO trees should be retained
- Large vehicles will not be able to use mini-roundabouts proving the site is not suitable for this use
- Visibility at existing and proposed junctions is poor
- Not enough space to provide sports facilities for both schools
- Traffic calming will be required due to additional hazards
- There must be a better site available
- Impacts on existing junctions have not been properly considered
- Pedestrian safety, children don't use footpaths
- Traffic reports are inadequate and do not provide enough evidence
- Alternative sites have not been considered including Widmore Centre and the Civic Centre
- Community use is not acceptable disruption outside school hours
- Existing secondary schools are undersubscribed
- Existing schools have room for expansion
- It has not been proven that an access from Bickley Road is 'less preferable'
- Secondary School places are not linked to local catchment areas
- Why has this site been chosen above other sites identified in the local plan process
- The PTAL rating for the site is poor
- Open nature of the site is affected contrary to Policy G8 of the UDP

Appendix 2

- School building is out of character in the area and contrary to policies 7.1, 7.4 & 7.6 of the London Plan
- The traffic and access problems associated with this development clearly identify this site is not suitable for a school
- There are only 2 bus routes that could serve the site this is not sufficient
- Additional car movements have been underestimated
- Roads in the area are regularly at a standstill
- Assumptions in the traffic assessment are not correct
- Neighbours were not consulted by the school as stated
- The school building is too close to residential properties (35m at the closest point)
- The development results in the loss of playing fields and is opposed by Sports England and contrary to Policy L6 of the UDP
- The proposed school and site do not comply with EFA basic standards
- The basic play provision standards are not achieved due to the restrictions on this site
- The proposed access is on the narrowest part of the road
- The route through the site will not be used to drop most children off
- The free flow of traffic around the site will be significantly affected
- Development is contrary to policy T18 of the UDP
- Children will congregate outside the school on a busy narrow road
- Signage will be in the direct view of residential properties
- Mitigation of noise for local residents has not been considered
- The building should be sited further away from Chislehurst Road
- Main pedestrian entrance should be from Pines Road which would be safer for pedestrians and the highway.
- The impact of the school development should be spread across the 3 adjoining roads not concentrated on Chislehurst Road
- Additional screening of the school is required
- Construction traffic should only enter from Bickley Road for safety reasons
- Questions raised over the need for a new school and in particular a boys school
- Bickley already has 9 schools in close proximity
- Proposed screening will not exist in the winter months
- Detrimental impact on privacy for nearby residential properties.
- The transport assessment confirms that Bickley Road has capacity but Chislehurst Road does not, why is the proposed access on Chislehurst Road
- No proper pavement for school children is being proposed in Chislehurst Road this is dangerous and unsafe
- Why is development concentrated in the northern part of the site, this has not been justified, why can't it be sited further south/more centrally within the site
- The Transport Assessment and its findings include a number of errors
- The school building will be overbearing for local residents
- The justification for educational need in the Borough is not correct

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- Other site sites are preferable more suitable, this application is premature
- The site selection report submitted provides no comparison or assessment and its use is extremely limited
- Justification required by the Mayor of London has not been provided
- Bickley is in an area of open space deficiency and is an important local amenity space
- The disused tennis courts are used for football and rugby training
- The proposed sport pitch provision is inadequate for both schools
- Evening community uses will have a further impact on local residential amenity including additional cars, noise and lighting.
- Existing school places should be filled and unpopular schools made attractive with investment
- How can a school advertise places when it doesn't have planning permission
- Education provision in Bromley should be reviewed
- Public money should not be used to build a school which is not needed
- There are existing unfilled spaces in Bromley schools
- Estimates of the need for school places should be reassessed
- St Hughes Playing field was ranked a Group 4 B site and there are clearly other sites that are more suitable as identified in the Local Plan.

Following the submission of additional highways information and the re-consultation of residents on the 5th September, further objections were received which can be summarised as follows:

- Traffic is getting worse over the years
- The school will be noisy
- Highways safety concerns
- The amendments don't address any of the residents' concerns
- The junctions are inadequate to deal with the increased flows
- The impact from the Girls School already causes highways issues
- The removal of the trees is unacceptable
- The site is not big enough for a school of this size
- The pupils attending the school will be from outside the Borough
- The plans have not changed adequately from the original application
- Loss of playing fields for the Girls School is unacceptable
- Damaging effect on the environment
- The existing school already imposes substantial pressure on the surrounding residents
- Will increase litter nuisance
- It would be more economical to extend the existing schools
- Glanville Report concludes that local traffic disturbance is unacceptable with the traffic associated with this new school
- Will lead to the destruction of the conservation area
- There are too many schools in the same area

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An Independent Traffic Report has also been commissioned and submitted by local residents and undertaken by Odyssey. The report reviews the findings of the Transport Assessment and Construction Management Plan. This report is summarised below:

- Insufficient pedestrian infrastructure provided to the west of the proposed pedestrian entrance on Chislehurst Road. There are substandard footways in two locations where no mitigation or improvement to pedestrian amenity has been put forward;
- Motorists will still have priority over the (now unflavoured) raised table crossing on Chislehurst Road, so that its effect on pedestrian road safety would be minimal. The amended arrangements in the new planning application for a significant number of pupils walking to and from school to the locations to the north do not overcome the objections in the previous refusal notice.
- The increase from 10 to 25 drop-off bays is insignificant given the inherently defective drop off / collection arrangement based on a single carriageway, one-way route, through the site with delays for users at various points and at the exit on Bickley Road. This arrangement will lead to parents / guardians parking in nearby streets to drop off / collect their children.
- The 5 drop off bays currently proposed near the vehicle ingress could result in highway safety issues with vehicles queuing back onto Chislehurst Road;
- The trip attraction figures are based on many questionable assumptions. This undermines the results of any junction capacity assessments. A robust analysis needs to be undertaken and assessed to demonstrate that the development will not lead to a severe impact;
- The base traffic data and queue length data contains significant errors;
- The parking stress on roads surrounding the site has been underestimated.
- Given the constrained and sensitive nature of the surrounding highway network, it is unlikely that the traffic impact of the new school could be reasonably mitigated through junction upgrades (albeit no attempt has been made to put forward mitigation measures);
- The ARCADY and LinSig models for the Bickley Road mini roundabout and signal junction network contain significant errors. A valid and robust assessment of the development's impact on the surrounding highway network is still required;
- The traffic impact at the Chislehurst Road/Pines Road junction is likely to be severe.
- The permanent traffic islands would be replaced by an inadequate temporary traffic island solution with lower kerbs (over-runnable by vehicles) and which do not include the reflective bollard, lighting and road signage safety elements of

permanent islands. This represents a significant reduction in road safety features in this location for a period of up to 2 years.

- Swept path analysis shows the Chislehurst Road mini roundabout junction cannot accommodate the turning movement of an articulated construction vehicle at the same time a box van type vehicle, even with over-runnable traffic islands.

A further report was undertaken by Odyssey and submitted in September 2017 which analysed the additional highways information received by the Applicant. The report findings can be summarised as:

- Insufficient pedestrian infrastructure provided to the west of the proposed pedestrian entrance on Chislehurst Road. There are substandard footways in two locations where no mitigation or improvement to pedestrian amenity has been put forward;

- Motorists will still have priority over the raised table crossing on Chislehurst Road, so that its effect on pedestrian road safety would be minimal. The amended arrangements in the new planning application for a significant number of pupils walking to and from school to the locations to the north do not overcome the objections in the previous refusal notice.

- The increase from 10 to 25 drop-off bays is insignificant given the defective drop off /collection arrangement based on a single carriageway, one-way route, through the site with delays for users at various points and at the exit on Bickley Road. This arrangement will lead to parents / guardians parking in nearby streets to drop off / collect their children.

- The 5 drop off bays currently proposed near the vehicle ingress could result in highway safety issues with vehicles queuing back onto Chislehurst Road;

- The trip attraction figures are still based on many questionable assumptions. This undermines the results of any junction capacity assessments. A robust analysis needs to be undertaken and assessed to demonstrate that the development will not lead to a severe impact;

- The base traffic data and queue length data still contain significant errors;

- The parking stress on roads surrounding the site has been underestimated.

- Given the constrained and sensitive nature of the surrounding highway network, it is unlikely that the traffic impact of the new school could be reasonably mitigated through junction upgrades (albeit no attempt has been made to put forward mitigation measures);

- The ARCADY and LinSig models for the Bickley Road mini roundabout and signal junction network contain significant errors. A valid and robust assessment of the development's impact on the surrounding highway network is still required;

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- The traffic impact at the Chislehurst Road/Pines Road junction is likely to be severe.
- The permanent traffic islands would be replaced by an inadequate temporary traffic island solution with lower kerbs (over-runnable by vehicles) and which do not include the lighting and road signage safety elements of permanent islands. This represents a significant reduction in road safety features in this location for a period of up to 2 years.
- Swept path analysis shows the Chislehurst Road mini roundabout junction cannot accommodate the turning movement of an articulated construction vehicle at the same time a box van type vehicle, even with over-runnable traffic islands.

Support

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

- Government support additional schools and policies encourage education provision. This proposal accords with government policy.
- Serious lack of school places and choice especially for boys
- Boys school is much needed and a great opportunity in Bromley
- Not enough Secondary School places in the Borough
- Traffic and congestion will be limited
- Parents consider moving away to get secondary school places
- Only option for local area and parents
- Boys currently have to travel across the Borough
- Children can walk to school rather than be driven across the Borough
- Design is well considered and minimal visual impact
- Continued development will only increase the pressure
- Environmental and infrastructure issues have been well considered
- This is in partnership with the Girls School
- The demand is high locally boys will walk or get the bus
- Staggered school hours have addressed traffic concerns
- Trees are retained and new trees planting is proposed
- Extra amenities and school places are required
- Need within the local community
- Such a school would be welcome in the Borough
- Schools should be available locally and in walking distance
- More desirable location to live in
- Schools are over subscribed
- The site is already used by a school
- Meets educational needs of local children which are only going to increase
- Where else will a school go
- Lack of local schools increases congestion and traffic
- The efforts made to limit its effects on the environment and local residents are considerable
- The land is currently underused

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- Last year there were 480 applicants for 180 places.
- Will relieve capacity issues at existing schools
- The proposed road system reduces congestion
- Can only benefit the local area
- Fits into its surroundings
- The site already has buildings on it
- Children will be able to walk to school
- Understand neighbours' concerns but these have been addressed
- Low key impact of the building
- Issues concerning inequalities of provision and the duty to consider this
- There is a need for excellent facilities for boys in Bromley
- Better than housing on the site
- This is a great opportunity for Bromley and its education provision and choice
- Management is already in place at the Girls School
- Excellent choice of site
- More housing needs more schools and education is crucial
- This should be approved for the wider community and its benefits for education
- Boys should have the same choices and education experiences as girls within the Borough
- The proposals should be supported and welcomed.

Following the submission of additional highways information and the re-consultation of residents on the 5th September, further comments of support were received which can be summarised as follows:

- Boys V Girls education is skewed in this part of the Borough and this proposal is a very well thought out solution to address the absence of boys places
- The school will reduce total car traffic as more boys would be able to walk to school
- It is beneficial to all in the borough to have another school run by the successful management team of Bullers Wood
- With the plans for more housing across Bromley and shortage of school places already this is a must
- The developers have addressed the traffic issues
- The site is designated for educational purposes
- The Council are under a legal obligation to have school places to meet the needs of the Borough
- There is a growing primary population in Bickley, secondary school places are needed
- A lot of the objectors live roads away and will not be impacted by the school
- The area needs another school desperately
- It will offer employment to construction workers in the short term

A petition in support of the application as well as a walking charter showing who and how many pupils would walk to school should the application be granted, have been submitted.

Comments from Consultees

Highways:

Construction Management Plan:

A CMP was supplied with the application. The proposal is to use the new Chislehurst Road access for construction traffic. The construction of the main school will take place while the first year intake (180 pupils) is on site. There will be 15 parking spaces for parent's drop off and pick up and 9 spaces for school staff accessed from Bickley Road. Site staff would park on the northern side of the site using the Chislehurst Road access.

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

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

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

In order to allow large vehicles to use the Chislehurst Rd / Bickley Road roundabout, turning to/from Widmore Road and Chislehurst Road, works would be required to the traffic islands at the roundabout. The islands are used by pedestrians, including pupils from Buller's Wood School for Girls, to cross the roads and they also control the deflection of vehicles around the roundabout. Complete removal of the islands for the duration of the works would not be acceptable. A Road Safety Audit was carried out on the options and the preferred option was over runnable islands with removable signage. This option would still require temporary traffic management to assist with the movements and to marshal pedestrians. Further detailed design would be required in order to make the option acceptable.

Access arrangements:

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

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exit via Chislehurst Road. A new pedestrian access is also proposed from Bickley Road.

There is currently no footway along the south side of Chislehurst Road and it is proposed to provide a short section of footway, approx. 17m in length, leading to a new raised crossing point. An existing speed cushion near the junction with Hill Brow would be removed. Sightlines would be provided by cutting back the existing vegetation.

Temporary Accommodation:

A prefabricated building will be placed on the southern car park for a year to accommodate the first year intake of 180 pupils and 10 FTE staff while the main school is built. A total of 15 parent drop off spaces will be provided during the construction period. A further 9 spaces will be provided for the staff. The access from Bickley Road is only wide enough for one vehicle and it is not clear how this will work during drop off and pick up periods.

In order to estimate the modal split, the travel survey data from the existing staff and pupils at the Girls School from 2017 was used. The data from the Girls School would include siblings sharing so the figures for car sharing may be on the high side for a one year intake. The figures in brackets show the modal split that was used in the previous application from earlier surveys.

Mode	Pupils (180)		Staff (10)		Total
	%	Number	%	Number	
Car	13% (15%)	23 (27)	70%	7	30
Car share	7% (10%)	13 (18)	4%	0	13
Park & Stride	7% (6%)	13 (11)	3%	0	13
Rail	6% (16%)	10 (29)	7%	1	11
Bus	23% (24%)	42 (43)	1%	0	42
Cycle	0% (0%)	0 (0)	4%	0	0
Walk	42% (28%)	75 (51)	12%	1	76
Other	3% (0%)	5 (0)			5
Total	100%	180	100%	10	190

On-site Parking:

Two areas of parking are proposed on the site. One car park for 11 vehicles, including 5 disabled spaces, is to the north of the site by the proposed Sports Hall. The main car park is in the south west of the site with provision for 58 vehicles. There is a drop off / pick up area for 20 vehicles around the edge of the main car park. There are also 5 drop off bays provided near the Chislehurst Road access

Cycle Parking:

A total of 18 Sheffield stands will be provided on the site, giving provision for 36 cycles. This is well below the London Plan requirements but it was noted that surveys at Bullers Wood Girls School showed no pupils and 4% of staff currently

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cycle. Based on that, 7 cycle stands would be required for this site. There is space on site to provide more parking facilities if required.

Delivery and Servicing:

Servicing and deliveries to the site will take place from the new vehicular access on Chislehurst Road. All delivery and servicing vehicles can turn on site and leave via the same access. Swept paths were provided for a large refuse collection vehicle.

Parking Surveys:

Parking stress surveys were carried out in roads within an approx. 400m walk distance of the site in May 2016 and were supplied with the previous application. These were carried out between 0700-1000 and 1430-1830 at 30 minute intervals. They showed that even with the Chislehurst Road, Widmore Road and Bickley Road omitted from the results there were a large number of spaces available throughout the survey periods. However, these are the roads closest to the site accesses where any parking would be likely to take place and where parking is likely to cause interference with traffic flows. The nearest roads such as Pines Road and Shawfield Park where parking could reasonably be accommodated are already heavily parked. Hill Brow is also nearby but as it is unmade that may deter parking.

Main School Development:

Applying the existing modal splits from the Girls School to the proposed Boys school would give the following results for the full school operation:

Mode	Pupils (900)		Staff (64)		Total
	%	Number	%	Number	
Car	13% (15%)	114 (137)	70%	45	159
Car share	7% (10%)	63 (90)	4%	2	65
Park & Stride	7% (6%)	64 (53)	3%	2	65
Rail	6% (16%)	50 (147)	7%	5	55
Bus	23% (24%)	208 (217)	1%	1	209
Cycle	0% (0%)	0	4%	2	2
Walk	42% (28%)	376 (254)	12%	8	384
Other	3% (0%)	27 (0)			27
Total	100%	900	100%	64	964

The figures in brackets show the modal split that was used in the previous application from earlier surveys. The car use has slightly declined. However, walking has significantly increased and rail use declined. This would imply a transfer from rail to walking which does not seem a likely scenario.

Park & Stride is a difficult category to analyse; it may depend on pupils' interpretation when they complete the travel survey or individual circumstances of how people are making existing trips. The assumption in the modelling is that these are trips already on the network that will not deviate from their existing route and pupils are dropped off at a convenient point to complete their journey on foot.

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These have been discounted from the new vehicle trip attraction. The "Other" category is unknown and together with the Park & Stride accounts for 91 trips in this assessment.

The TA then argues that these figures do not consider the effect of siblings sharing which would reduce the car trips by 5% and the effect of the proposed School Travel plan which would reduce trips by 14%, in line with the reduction achieved at the Girls School. In addition a third of pupils are assumed to attend the pre-school breakfast club which means they would arrive prior to the AM peak hour of 7:30am - 8:30am. These combined have the effect of reducing the number of pupil car trips from 114 to 62. These, together with staff trips, are the figures that have been used to model the AM peak hour.

The Travel Plan reduction seems ambitious particularly given the modal split is taken from a school with a Travel Plan in place and where there would be siblings present. The breakfast club reduction was based on " information from the girls school that 16% of pupils participate in extracurricular activities after school. It has been assumed that a similar number of pupils would also undertake activities prior to the school day, including the Breakfast Club. In addition to the standard breakfast club, the school confirmed that 17% of pupils are provided with a free breakfast. Therefore the total proportion of pupils anticipated to arrive at the site prior to the AM Peak is 33%". Given the early start time for the Boys School there must be a question whether that is realistic assumption.

As part of the information recently supplied (13/9/17) it was indicated that further surveys at the Girl's School had shown that 81% of the pupils arrived more than 15 minutes before school starts. If that were applied to the proposed Boys School only 19% or 22 vehicle trips would arrive in the modelled AM peak hour (7.30am - 8.30am). However the modelling did not use these further reduced flows so as "to represent a very robust scenario".

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

Sports Hall - Out of hours community use:

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

Junction Modelling:

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

The roundabout junction of Bickley Road / Widmore Road / Chislehurst Road is overcapacity at present. There are often substantial queues on Chislehurst Road in the AM peak. The computer model, ARCADY, is generally accepted as becoming unreliable once the junction goes over capacity and so it is unclear how much weight can be given to the results. The model has been calibrated using a method which is not supported by TRL, who are responsible for the software. It does show, however, an increase in congestion at the junction.

The A222, which includes Widmore Road and Bickley Road, and is one of the main east - west routes across the Borough has been identified by the Council as having congestion issues. There have been a number of improvements along the route over recent years aimed at improving traffic flows. However there are likely to be concerns with any proposals that increase congestion on this route, either by giving more priority to side roads or generating a large amount of additional traffic. No mitigation measures have been explored.

For the traffic signal junction of Bickley Road / Pines Road / Bickley Park Road / Southborough Road / Page Heath Lane it is concluded that, due to the lack of data collected when setting up the traffic model, the modelling does not show if the junction is currently operating within its design capacity, or if it would operate within its design capacity following the implementation of the development. It also does not show how queuing may change as a result of the development.

The Chislehurst Road / Pines Road junction is also shown as going over capacity once the school is operational. No mitigation measures are proposed.

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

Impacts from the Development:

The assumption that goes with the layout and access arrangements is that parents will drive into the site to drop off and pick up children. There are 25 short term parking bays and there is space within the site on the access road for vehicles to queue but much of this is single track.

Despite the argument put forward in the TA, there is still the likelihood that parents will drop off and pick up pupils on-street. It is proposed that school staff manage

any on-street parking issues. However, I am not sure that happens to any great extent at any other school and it would need to be an ongoing commitment.

The two nearest roads to the site, Chislehurst Road and Bickley Road, are likely to be the most attractive and parking here will interfere with the free flow of traffic. Chislehurst Road already has queuing from the mini roundabout going past the proposed access and this will only exacerbate the situation.

The introduction of waiting restrictions is a possibility but it is unlikely to deter such parking unless there is a Traffic Warden present.

Chislehurst Road Access:

A short section of footway is proposed leading to a raised crossing point. This is significant improvement over previously proposed arrangements. Pedestrians are still directed to a single point to cross the road and not in a more diffused manner as would be available if there were footways on both sides of the road.

The Stage 1 Road Safety Audit raised a number of issues with the access. The main one seems to be inappropriate parking in the vicinity of the access. The introduction of waiting restrictions is unlikely to deter short term parking associated with schools.

The advice in Manual for Streets is that footway widths in excess of 2m should be considered for areas around schools. If parents are dropping off children on this side of the road they will end up walking in the road to the entrance. If they cross the road, the footway on the northern side is substandard. Widths of the footway on the northern side of the road given in the TA, vary from 1.3m to 2.1m. In the morning peak the pupils heading towards Bullers Wood School for Girls already take up the footway for periods of time. The estimates in the TA are that 138 pupils will use this access, it is then equated to pupils/minute but it is likely that they will leave or arrive at the access in groups.

Public Transport Use:

Trains:

There are 50 pupils estimated to use the train, reduced from 147 in the previous assessment. The footway from Bickley station along Southborough Road towards Bickley Road is relatively narrow, measurements in the TA show going down to 1m. In the morning peak pupils will be going against the flow of commuters going towards the station and people will step into the road. The carriageway is also relatively narrow so they will be in conflict with vehicles.

Buses:

There are over 200 pupils estimated to come to the school by bus. There are 2 bus stops in proximity to the Bickley Road access. However, there is no nearby crossing point and, given the level of traffic flow, some form of crossing would be needed to get pupils across the road. A puffin crossing has been proposed to allow

people to cross Bickley Road. If this is to be taken forward it will need to be secured via a s278 or s106 agreement.

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

TfL's initial response indicated that, given the number of pupils, there will be constraints on the local bus services (routes 162 and 269). Pressure on these services could be relieved if the school start and finish times are staggered with the nearby Bullers Wood School for Girls. Failure to do so would require mitigation to meet the demand for bus travel.

The information now provided is that the Boys School would start at 07:45 and end at 14:20 when approx. 54% of the pupils would leave the site, with extra-curricular activities finishing at 15.20, when approx. 40% of the pupils would leave. The remaining 6% would leave later. The Girls School starts at 08:25 and finishes at 15:10 with after school activities finishing at 16:10 and 16:40. TfL have accepted this although there does appear to be an overlap.

Transport for London (TfL):

Vehicle Access and Trip Generation:

TfL considers the approach to trip generation and modal split acceptable and in line with London Plan Policy 6.3. Given that the site is not within close proximity to the Transport for London Road Network (TLRN) it is unlikely that the proposed development would result in an unacceptable impact to the TLRN.

The installation of a puffin crossing facilities on Bickley Road improves pedestrian safety. Details will need to be confirmed via the detailed design process which should ensure that there will be no conflict with bus movements which could result in road safety concerns. It is requested that an informative is added noting that the applicant is required to enter into a s278 agreement with the council to deliver these highway changes. The s278 will need to include an undertaking to ensure all fees associated with delivery are paid by the applicant, including TfL's staff time in design, assessment and delivery of the crossing.

Car Parking:

A total of 69 car parking spaces are proposed including 5 disabled parking spaces which is unchanged from the previous application. A drop off / pick up bay is also proposed within the site to accommodate around 20 vehicles. This has doubled from the previous application. TfL is keen to ensure a balance is struck between limiting and the effective promotion of travel by sustainable modes which could be compromised by over provision in drop off space. As such TfL expects that the School Travel Plan will include effective and well resourced measures to promote more sustainable travel modes to reduce the amount of travel by car in line with London Plan policy 6.3. Further details are provided below.

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The applicant should also increase the provision of Electric Vehicle Charging Points (EVCPs) from the two spaces to 20% active EVCPs plus 10% passive, resulting in the need for 13 active and 6 passive spaces.

Cycle Parking:

A total of 36 cycle parking spaces are proposed which is less than the minimum standards set out in the London Plan. The number of spaces should be increased to 129 spaces in line with required minimum standards. TfL appreciates the phased nature of occupation; as such a measure linked to the travel plan to deliver spaces ahead of each intake could be accepted to deliver 129 spaces by the 5th year of operation. This would require a minimum of 24 spaces per year group and spaces per staff to be determined. Bicycle parking should be sheltered; the locations as shown on plan, '3817_SK_009' are considered acceptable and should be secured by condition or through the Travel Plan.

Buses:

The highway works are largely as per the previous application on Bickley Road. They result in the need to relocate the existing eastbound bus stop (number 19745) and shelter (number 0106/1179) on the northern side of the A222 Bickley Road to a location 40 metres to the east. The bus stop on the southern side of the carriageway (number 19744) and shelter (number 0106/1203) would remain in its current location but a new shelter will be installed (extending from a 2 bay to a 3 bay) to meet the likely demand.

The highway works associated with the bus stop relocation and shelter upgrade will need to be confirmed via a detailed design process which should be secured via an appropriate condition or planning obligation in consultation with TfL. Furthermore the applicant is aware that they will be responsible for all costs associated with the works and this should be secured via an obligation or via the s278 agreement. TfL can follow up with a detailed quote upon request.

TfL have considered the likely impact on bus capacity and it is noted that given the number of pupils proposed there would be some constraint on the local bus services (routes 162 and 269). Pressure on these services could however be relieved should the school ensure arrival and departure times are staggered with the nearby Bullers Wood School for Girls. Failure to do so will require mitigation to meet the demand for bus travel in line with London Plan policy 6.7. This should be included as part of the School Travel Plan and secured by condition.

Travel Plan:

TfL welcomes the provision of a draft School Travel Plan which sets out relevant aims and objectives to encourage sustainable travel. Involvement in the TfL school travel planning accreditation scheme (STARS) is required and the Travel Plan should be regularly updated and monitored to ensure compliance with London Plan policy 6.11. The commitments towards Bronze and Silver status are welcomed. Detailed comments on the Travel Plan are to follow. Initially the Travel Plan should be drafted to include,

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- A commitment towards delivering London Plan policy compliant levels of cycling parking by the 5th anniversary of operation,
- Measures to minimise impact on buses including staggering start times should be provided.
- Amending the initial cycle hire mode share, whilst it is appreciated targets will be reviewed, it is considered unacceptable to have a target of 0% for cycling when the travel plan sets out measures to increase cycling.
- Extending the welcome pack from staff to all new pupils and following this up with regular correspondence around alternative modes than the car, such as newsletters and the website.

A commitment to updating, monitoring and funding the travel plan and associated measures should be secured as part of any planning permission.

Construction:

TfL welcomes the draft Construction Traffic Management Plan (CTMP) which has been submitted with the application. This is considered in conformity with TfL's guidance on Construction Logistics Plans. The proposal to focus construction activity on Chislehurst Road will seek to limit the impact on buses on Bickley Road which is supported. TfL requests consultation should any part of the build (including the temporary school) render it necessary to impact on the bus stops on Bickley Road. The applicant should ensure that no construction related deliveries will be undertaken during the peak periods (07:00-09:00 and 15:30-18:00). Furthermore a commitment to use FORS registered contractors is required. The CTMP should be secured by condition and discharged ahead of commencement of the works.

Conclusion:

In summary, TfL confirms that the proposed development would be unlikely to result in an unacceptable impact to the TLRN; however given that a number of the pupils would be expected to travel by bus the arrival and departure times of the proposed school should be staggered with surrounding schools to alleviate the likely impact on bus capacity.

Further discussions regarding the detailed design of the bus stops and shelters and highway works located on Bickley Road should be held between the applicant and TfL. This should consider the wider modelling results which show several junctions being over capacity. Electric vehicle charging points should be delivered at the school, the level of cycle parking should be increased and the School Travel Plan will need to be updated and monitored to ensure consistency with London Plan policy.

Following the submission of amended and additional highways information, TfL provided further comments which can be summarised as:

Parking:

TfL's comments around the drop off remain. Whilst it is appreciated that on site servicing will reduce pressure on the surrounding roads, TfL considers that the doubling of space for drop off will seek to undermine the use of sustainable transport modes. Previously we noted that stringent travel planning measures must be implemented to avoid overreliance on the car. Comments on the travel plan are provided below. Notwithstanding these, TfL consider that the drop off is reduced in scope from 20 spaces to 10 spaces alongside the addition of double yellow lines on the access road and double yellow lines / keep clear lines on the access roads around.

A monitoring clause should thereafter be added that if the school is generating unacceptable impacts and all other travel plan measures have been exhausted, the space could be drop off space can be increased to but not exceeding 20 spaces. This would ensure general conformity with London Plan policy 6.1. The no stopping on the access road will also serve as mitigation to ensure that there is no blocking back onto the surrounding highway network.

Buses:

As previously, TfL considers the scheme will increase demand on the bus network. The additional analysis of the 314 is welcomed. It is considered that the 162 would be the preferential route and TfL's route analysis has focused on this and route 269. As the student numbers haven't changed TfL's comments are as previous. It has been accepted that pressure on these services could be relieved should the school ensure arrival and departure times are staggered with the nearby Bullers Wood School for Girls. Failure to do so will require mitigation to meet the demand for bus travel in line with London Plan policy 6.7. This should be included as part of the School Travel Plan and secured by legal obligation or condition.

Junction Impacts:

It should continue to be noted that junctions on both Chislehurst Road and Bickley Road exceed their theoretical capacity during the AM and PM (School) peak hours. This is a valid consideration for the council when planning any interventions including the signalised crossing. The additional analysis demonstrates no significant increases from the original TA. As the highways affected are borough roads and the proposed designs offer safe routes to schools, TfL offers no further comment on this aspect.

Travel Plan:

Regarding the Travel Plan, TfL offers the following comments,

- The school should attain Gold STARS status by start of 2021 academic year as between the boys and girls school there will be a total of 2247 students therefore it will be important as many as possible travel actively and sustainably.

Appendix 2

- The hands up data sample is limited as it represents less than 2/3 of the school population, our data currently shows that 369 pupils travel by car and currently 37% travel via active modes (walking, cycling and scooting).
- The 0% cycling is a concern the girls school currently undertake at least three Bikeability courses provided by the borough each academic term. The data shows currently three pupils from the girl school currently cycle. TfL suggests current mode share 0%, 3 year target 1% 5 year target 3%, this should be subtracted from the car mode %.
- Regarding reduction in car use, the school should look to implement a park and stride walking zone to reduce congestion closer to the school.
- In addition the school should implement a clause within the travel plan to monitor drop offs on an adhoc basis. If capacity of the drop off facility is exceeded for 16 days over a period of 4 weeks; i.e. 80% of the time (captured through on the ground surveys) the school should implement all travel plan measures Set out within section 5 of the Travel Plan. If within two subsequent 4 week periods (32 days in 40) again 80% of the time then the school should approach the council to apply to expand the drop off facility. Capacity should be measured by vehicle accumulation exercises over the school peak period supplemented by photographs. Any expansion should only be accepted where all travel plan measures have been exhausted.
- The school should set up a School travel plan steering group; for this to have an impact and targets achieved a requisite for a SMT member to be a part of this group.

Sport England:

It is understood that the site forms part of, or constitutes a playing field, or prejudices the use of a playing field, as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). The consultation with Sport England is therefore a statutory requirement.

Sport England has considered the application in light of the National Planning Policy Framework (particularly Para 74) and Sport England's Playing Fields Policy, which is presented within its Planning Policy Statement titled 'A Sporting Future for the Playing Fields of England'.

Sport England's policy is to oppose the granting of planning permission for any development affecting playing field land unless it meets with one or more of the five exceptions stated in its policy.

The proposed development would appear to be sited on an existing area of playing field. Locating this aspect of the proposed development on the existing playing field would prejudice the use of the playing field.

Appendix 2

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

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

However, Sport England would be happy to review its position if it can be demonstrated that Sport England's Playing Fields Policy can be met.

The Agent directly responded to Sport England comments asking for a more detailed explanation position and basis for the objections. Sport England responded:

'As previously stated, Sport England would suggest that a potential way forward would either be to propose a replacement playing field (in terms of the playing field area to be lost) or playing fields in line with policy exception E4 of Sport England's Playing Fields Policy or propose a community size 4 court sports hall (34.5 x 20m) and position the proposed MUGAs side by side and fence them (sports lighting should also be considered). This would provide more capacity and they would constitute formal sports facilities. Sport England would then assess this proposal against E5 of Sport England's Playing Fields Policy'.

The Applicant has responded to the points raised by Sport England however Sport England maintain their objections.

Environmental Health:

Contamination: An informative should be attached that should during the works on site any suspected contamination is encountered, Environmental Health should be contacted immediately. The contamination shall be fully assessed and an appropriate remediation scheme submitted to the Local Authority for approval in writing.

Noise:

A number of concerns were raised regarding the acoustic assessment carried out:

1. Sec 7 states that their noise criteria is 5dB below background noise. Our position has always been that 10dB below background is the criteria, however this can be relaxed to 5dB where background levels are very low, or it is not practical to achieve the lower level. I do not believe either to be the case on this site.
2. No information is given regarding the nature or reliability of the background noise measurements, nor is there any description of the nature of the predicted noise. It is unclear from the Report whether Average noise levels (LAeq) or Background noise levels (LA90) have been used in making the comparison. It is unclear whether mitigation methods have been investigated.

3. A number of assumptions have been made regarding the number of vehicle movements but the source of this information has not been referenced. The number of vehicle movements seems to be very low, for instance only 10 cars arrive (and remain) between 0730 and 0830. The obvious question then is what time do the other staff arrive and/or do they use other means of transport?

Lighting:

I would have no objections to the proposals as detailed in the Crofton Design Report C08493 Rev P2.

Air Quality:

The Aether report ref Aether/AQA/2015/Bullers_Wood (Draft Report) deals with the air quality on the site as well as the impact of the development on the wider community. I concur with the conclusions and have no further comment.

Following the submission of additional information regarding the acoustic assessment, no further objections were raised from the Environmental Health Officer subject to conditions restricting the noise levels on the site and from the plant and the submission of a noise management plan prior to occupation of the school.

Drainage:

Reviewing the submitted FRA carried out by Evans & Langford LLP with Ref No. 13791 dated June 2016 Revision 2017. I note in paragraph 7.8 surface water will be stored in the sub-base of the lower car park before it infiltrates into the soil. The pavement for the car park will discharge to the sub-base which consist of gravel. The driveways will discharge to swales. I can confirm that the above strategy is acceptable subject to detailed design and conditions.

Thames Water:

Waste Comments: Thames Water would advise that with regard to sewerage infrastructure capacity, we would not have any objection to the above planning application.

Informatives are required should permission be granted.

Natural England:

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

Historic England (Archaeology):

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

Greater London Authority (GLA):

Principle of development:

The provision of a secondary school fully accords with the Council's emerging local policy designation, and responds positively to London Plan Policies 3.18 and 3.19. GLA officers will work with Sport England and the Council to verify that the relevant Exceptions Tests and policy requirements of Sport England are considered to be being met.

Energy:

Further clarification is required with regards to energy efficient, overheating and renewable technologies to verify the carbon dioxide savings overall. The applicant should also discuss arrangements for meeting the carbon dioxide shortfall with the Council.

Transport:

The proposed development is likely to impact on bus service capacity. Mitigation measures including staggering school arrival and departure times should be secured via a robust travel plan. Further measures around bus stop upgrades and the addition of a new crossing must also be secured by the Council. EVCPs should be delivered, cycle parking provision should be increased and the school travel plan will need to be updated and monitored to ensure consistency with London Plan transport policies.

Partial loss of urban open space and playing fields:

In this context, in terms of existing provision lost, there are 3 hard surfaced tennis courts (disused) and 6 grass tennis courts (disused) which are split in two by fencing. In their place are proposed two external games courts and a 4 court indoor sports hall. Information regarding the change in playing field provision is addressed within the application submissions and whilst there will be a net loss, it is considered to be marginal at a quantitative loss of 15.2% excluding the indoor facilities and 12% including the indoor facilities, when considered against the wider education and community benefits to be gained. The proposed provision is

comparable and provides qualitative improvements, including indoor provision, and as such is considered to meet the relevant Sport England exception test.

Tree Officer:

Previously conditional permission was recommended in respect of application 16/03315/FULL1. Tree constraints were acknowledged at a pre-app stage and permission appeared achievable with regard to at least a couple of development options.

This application is supported with an Arboricultural Impact Assessment (AIA) and tree survey information. Tree constraints have been addressed and protection measures considered as part of the AIA. The preliminary tree protection drawing illustrates the protection measures across the site. The proposals will see the removal of a number of C category trees that are insignificant and a small number of B category trees. The scheme allows for the provision of replacement planting as part of the new landscape plan. This is considered mitigation for the proposed loss of B category trees across the site.

I note that most of the consideration on tree impact has been covered by the supporting AIA and tree survey report, however, I see it prudent that an Arboricultural method Statement (AMS) is submitted under condition. I would also request more detailed information on tree species selection for the new planting scheme. I would therefore recommend that conditions are applied to any forthcoming consent.

Following receipt of the Tree Officers comments, concerns were raised on behalf of neighbours as to the validity of the Arboricultural Impact Assessment because the report and any recommendations made in it are limited to a 12 month period from the survey date (June 2016). The neighbour also raised concern as to further tree work that would be required to facilitate highways improvements including the removal of trees which were not covered in the AIA and raised concerns as to the impact on bats.

The Applicant responded both stating that the recommendations within the report were sound and still valid and that with regard to trees T78 and T79, the tree report states that under certain circumstances the extent of risk of root damage cannot be fully ascertained until such time as works are actually carried out. In acknowledging this the report recommends that, in compliance with BS5837, a method of working should be adopted that is designed to minimise the risk of damage to tree roots. Whilst 'minimal dig' is the preferred option, there may be occasions where this is not viable, and BS35837 sets out alternative protective measures and procedures that can be adopted. The Applicant also noted that it should also be borne in mind that the construction detail for a pedestrian trafficked footway is much lighter in design than a surface designed to take vehicular traffic.

The Applicant also stated that regarding the potential for trees to provide habitat for bats, this issue is raised for legal reasons. We are under an obligation to bring to the attention of our client and the LPA that due to bat roost potential within these trees, should at any point during the project it become necessary to consider

carrying our arboricultural works to these trees, including felling, it would be necessary for additional bat surveys to be carried out to inform procedures and decisions, prior to works being carried out. This is quite routine. Dead wood can also provide habitat for birds and invertebrates, and the provisions of the 1981 Wildlife and Countryside Act still apply irrespective of what permissions are granted under the Town and Country Planning Acts.

The Tree Officer was happy with the response received from the Applicant and no concerns were raised.

Conservation Officer:

The proposal site is adjacent to the Bickley Park Conservation Area. Therefore the conservation considerations will have regard to Policy BE13 (Development Adjacent to a Conservation Area) and NPPF para 129 requires the local authority to have consideration to the impact of a proposal on the setting of a heritage asset, which in this case is the CA itself. The function of a proposed use can also impact on character and therefore any increase in traffic or parking pressure needs to be assessed.

Policy BE13:

This policy relates to views into and out of the conservation area. The conservation area boundary includes the front gardens of the houses on the eastern side of Pines Road but not the road itself. Given the separation and screening along the western side I do not see that any important views into the conservation area would be affected, and certainly not from any public vantage points. Likewise any impact on views out of the CA from Pines Road would be substantially mitigated through generous physical separation and tree screening even if this is less so in winter. Whilst glimpses of the new 3 storey structure would be visible from some locations no harm would be caused in my opinion.

Setting of the Conservation Area:

St Hughes playing fields are a substantially open parcel of land to the west of the CA but considering the generous separation between the new school building and the houses on Pines Road, the development would not appear overbearing or cramped and the overall spacious setting would be retained.

Parking and Traffic:

The Transport Assessment indicates that there would be no direct access to the school from Pines Road and the road is also substantially parked up already during the day. I would conclude therefore that any increase in traffic movements or parking would not be so great as to cause harm to the character of the adjacent CA. I would also note that a travel plan has been prepared and many students will arrive by methods other than car. I note that the applicant has proposed some highways changes from the previous 2016 scheme but these would not amount to any change in the conservation perspective expressed above.

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 Practice Guidance (NPPG) as well as other guidance and relevant legislation must also be taken into account.

Unitary Development Plan (2006)

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

Bromley's Proposed Submission Draft Local Plan:

According to paragraph 216 of the NPPF decision takers can also give weight to relevant policies in emerging plans according to:

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

As set out in paragraph 216 of the National Planning Policy Framework, emerging plans gain weight as they move through the plan making process.

The following emerging plans are relevant to this application:

Draft Local Plan

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.

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

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- 2.6 Outer London: vision and strategy
- 3.16 Protection and enhancement of social infrastructure
- 3.18 Education Facilities
- 5.0 Overheating and cooling
- 5.2 Minimising carbon dioxide emissions

- 5.3 Sustainable design and construction
- 5.7 Renewable energy
- 5.6 Decentralised energy in development proposals
- 5.8 Innovative energy technologies
- 5.10 Urban Greening
- 5.11 Green Roofs and Development Site Environs
- 5.12 Flood Risk Management
- 5.13 Sustainable Drainage
- 6.3 Assessing effects of development on transport capacity
- 6.9 Cycling
- 6.13 Parking
- 7.2 An inclusive environment
- 7.3 Designing out crime
- 7.4 Local character
- 7.5 Public Realm
- 7.6 Architecture
- 7.8 Heritage assets and archaeology
- 7.13 Safety, security and resilience to emergency
- 7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes
- 7.21 Trees and woodlands
- 8.1 Implementation
- 8.2 Planning obligations

National Planning Policy Framework (NPPF) (2012) and National Planning Practice Guidance (NPPG) must also be taken into account. The most relevant paragraphs of the NPPF include:

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

Planning History

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

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

Various applications for works to trees - approvals.

16/03315/FULL1 - Proposed erection of a 6FE Secondary Boys School comprising a part 2 storey, part 3 storey school building of 8,443m² including a sports hall (also for wider community use) together with hard and soft landscaping, creation of a new vehicular access on Chislehurst Road, 68 parking spaces, drop off/pick up area and associated works. Erection of a temporary 2 storey classroom block on site for 12 months to accommodate 5 classrooms, a laboratory, offices and toilets - Refused

Reason for refusal:

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

An appeal was lodged on the 1st August 2017 and is now valid, proceeding via the written representations procedure.

Conclusions

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

- Principle of Development
- Educational Policy and Need
- Playing Fields and Sports Pitches
- Highways and Transport
- Design, Layout, Scale and Impact
- Residential Amenity
- Trees and Landscaping
- Temporary Accommodation and Phasing
- Contributions
- Other Technical Issues

Principle of Development

The application site comprises playing fields for Bullers Girls School, disused tennis courts, a wooded area, an Air Cadets building and Pavilion and is designated in the UDP as Urban Open Space. For the purposes of this application, the up to date development plan comprises the Unitary Development Plan (saved policies), the London Plan and the NPPF. In the first instance the application will be considered in the light of these policies. The weight and relevance attached to policies in the Proposed Submission Draft Local Plan will also be discussed in this section.

Appendix 2

UDP Policy G8 relates to development in Urban Open Spaces and states:

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

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

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

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

The supporting text of this policy advises that UOS is locally important public or private open space identified by individual Councils that needs protection. The identified UOS is considered to be of local significance as they fulfil specific function in their localities, such as providing important breaks in the urban area. The primary purpose of the policy is to protect the open character of the UOS. On sites where there are no buildings only proposals relating to the functioning of the outdoor sports or small scale children's play facilities may be permitted and where replacement buildings are proposed for existing redundant buildings are restricted to the same site coverage as the existing building.

The considerations when reaching a conclusion on this aspect are the educational need in the Borough, the availability of alternative sites, the emerging development plan and the community benefits of the development. This needs to be assessed against the impact on the local environment, residential amenities and the transport and traffic impacts of the development.

Policy G8 is in line with Policy 7.18 of the London Plan. The main consideration identified under Policy 7.18 is the protection of locally designated open space stating that 'the loss of protected open spaces must be resisted unless equivalent or better quality provision is made within the local catchment area. Replacement of one type of open space with another is unacceptable unless an up to date needs assessment shows that this would be appropriate.'

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

the UDP Policy G8 and London Plan Policy 7.18 it is considered that the current proposal would be contrary to these policies and unacceptable in principle. It is therefore a Departure from the provisions of the Development Plan. However, it is appropriate in this case, to consider whether other material considerations, when taken together outweigh the lack of compliance with both Policies G8 and 7.18.

The Submission of the Draft Local Plan (2017) indicates the Council's view of the way forward for this policy. Under paragraph 216 of the NPPF the emerging Local Plan carries some weight dependent upon the stage of preparation, the extent to which there are unresolved objections and the degree of consistency with the NPPF. At this stage it is considered some weight can be attached to emerging Local Plan Policies.

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

Draft Policy 55 states:

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

- a - The development is related to the existing or allocated use (in this context, neither residential nor indoor sports development, other than sports development related to educational use on the site, will normally be regarded as being related to the existing use); or
- b - The development is small scale and supports the outdoor recreational uses or children's play facilities on the site; or
- c - Any replacement buildings do not exceed the site coverage of the existing development on the site.

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

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

The proposed new build development to provide a secondary school would therefore comply with this draft policy which is afforded greater weight than when previously considered given the progression made in submitting the Draft local Plan to the Secretary of State. In addition, given the scale of the building and associated development, the proposal minimises the harm to the open nature and character of the site with the retention of all the existing playing field area and

retention of most trees. It is acknowledged that there are a number of factors which could be considered to weigh in support of the development which includes the significant need for additional school places in the Borough and the positive support for education development in the development plan, as well as the potential benefits to the local community as made available for wider community use, this will be discussed further later in the report.

In addition, there is a Draft Allocation for this site in the emerging Local Plan, which identifies the site as a location for a 6FE secondary school. This can be afforded some weight in the overall planning balance given that the draft has now been submitted for examination.

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

Therefore, as will be discussed in the report there may be material planning considerations which outweigh the harm to the loss of UOS and justify some loss to the provision of open space on this site. The following sections will identify the educational need as justification for overturning UOS policy designation. Nevertheless the current adopted policy position as identified in the UDP is the protection of the UOS designation and a new school would not comply with adopted Policy G8.

Educational Policy and Need

Policy

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

The NPPF was preceded in Aug 2011 by a joint ministerial policy statement on planning and education and remains a material consideration. It is strongly worded to ensure that the answer to proposals for the development of state-funded schools should be, wherever possible, "yes". It sets out the Government's commitment to support the development of state-funded schools and their delivery through the planning system. In summary it identifies the following:

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

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

Reference is made in the representations received to the Council's Equality duty, in particular the availability of boys' school places relative to girls' school places in the vicinity. The representation seeks the provision of school places for boys.

All secondary schools in Bromley are now academies and comprise both mixed schools and single sex schools.

The Council's Public sector equality duty (Equality Act s149) requires a public authority, in the exercise of its functions, to have *due regard to the need to—*

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

The proposed school will assist in meeting the projected need as well as increasing the choice for pupils / parents, in line with draft Local Plan Policy 27 which states: *"The Council is committed to choice in education for parents and young people and will work, in partnership with agencies and providers, to ensure the provision of an appropriate range of educational facilities..."*

Due regard should therefore be given in that context to the educational provision for boys that could be made by the proposal.

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

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

Site Selection Process

The Council have submitted their Draft Local Plan to the Secretary of State for examination and hearings are anticipated later in the year. The draft Local Plan has been developed on the basis of the evidence base, including an Education Background Paper in Sept 2015 (updated Autumn 2016). The Background Papers set out the educational need on the basis of Council's reviews of secondary education", and undertook an extensive site search of the full range of potential sites, including existing education sites, vacant social infrastructure sites and all sites submitted through the Local Plan "Call for Sites" process, along with sites identified by proposed Free School providers.

The Local Plan (supported by the site selection process undertaken in the Education Evidence Base paper) responds to the constraints of open space designations across the Borough, including covering existing schools. Initially sites were grouped relating to existing strategic policy constraints. Sites in each group were assessed in line with the approach to social infrastructure and specifically education, set out in London Plan Policies 3.16 and 3.18 and ranked.

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The individual merits and recognised material considerations relating to each site were then assessed against local planning policy. However, there were insufficient policy compliant sites (Group 1) to address the projected need. Urban Open Space sites are sequentially preferable to sites in Green Belt or Metropolitan Open Land where schools are "inappropriate development" and the draft Local Plan therefore proposes increased flexibility of the Council UOS policy in relation to education development for existing schools (Group 2). This proposed increased flexibility to the UOS policy facilitated expansion at additional school sites in UOS, however, this change was not sufficient to address expansion needs and therefore a number of existing schools within Green Belt and MOL (Group 3) are proposed to be re-designated to the more flexible UOS designation to enable expansion. Whilst the school expansions within Group 2 and Group 3 contribute significantly to meeting the education need over the plan period there remains an outstanding need which will be met through the provision of new 'Free Schools'. Collectively Groups 1, 2 and 3 were unable to deliver sufficient sites for new schools hence an assessment of the Group 4 sites.

This assessment produced two proposed allocations, including the St Hughes Playing Fields, set out within the draft Local Plan which have been approved by the Council and submitted to the Secretary of State for examination.

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

Draft Policy 27 - Education - advises that the Council will assess the need for education infrastructure and allocate sites accordingly by safeguarding education sites for the plan period. It identifies

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The Applicant has also undertaken a site assessment process of all potential sites within a 5 mile radius from the application site which includes all development land of 4-10 acres or existing buildings of 70,00ft². The search includes and has identified all 'on market' opportunities or development land and has had regard for 'off-market' land, including Bromley's employment land clusters, natural green space, parks and outdoor sports sites that meet the above parameters. The sites have been assessed according to their suitability, resulting in the selection of the preferred option. This identified a preferable site in Chelsfield which is situated in the Green Belt and Conservation Area where new development is likely to be resisted in line with planning policies. The assessment identified 12 further potential sites in the Green Belt, 1 in Metropolitan Open Land, 2 sites sited within an Area of Nature Conservation Importance, 2 allocated housing sites that are currently being developed, The Widmore Centre and Balmoral Avenue (Beckenham Academy) both of which are already being brought forward for other Free Schools.

This further identifies that alternative sites for a new school are limited within this part of the Borough and in all cases have restrictive designations that policies seek to preserve or are allocated for housing or other schools. The deliverability of other sites for new schools is therefore restricted and the need for the application site for a school has been identified. The site selection process has therefore been rigorously considered by both the Council in the development of its emerging Local Plan and the Applicant in support of the application.

Weight to be attached to Emerging Local Plans

Appendix 10.4 Education Site Allocations, includes the application site, Site 33 allocated "for an additional secondary school (Bullers Wood School for Boys)."

The National Planning Policy Framework (para 216) advises that from the day of publication, decision-takers may also give weight to relevant policies in emerging plans according to:

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

The "Proposed Submission Draft Local Plan" was the subject of a Regulation 19 consultation late 2016. Objections, reflecting the objections to this planning application, have been raised to the allocation of this site for education. These objections to the Local Plan reduce the weight the draft designation can be given taking into account the stage of the Local Plan process.

The principle of the provision of new schools is therefore well established in planning policy from a National to a Borough level. The site would offer an option for education facilities that fulfil a need. The key issues in regard to this proposal would be the consequential impact on the UOS as a result, which would involve weighing up the educational need against the impact on the UOS along with other material consideration which include the impacts on the locality, highway safety considerations and the impact of the development on local residential amenities.

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

Educational Need for Secondary School Places

The Submission Draft Local Plan (2017) has been produced on the basis of robust evidence. The Education Background Paper (2016) reflects the Secondary School

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Development Plan (2016), and indicates the need for 17 additional forms of entry required between 2014/2015 and 2018/19. The projections show the need increasing further to 23FE by 2020.

These projections, which include a standard 5% contingency for fluctuation in growth and parental choice, are included within the Submission Draft Local Plan (2017) which has been submitted to the Secretary of State for Examination in Public.

The draft Local Plan Policy 29 includes expansions and the allocation of new sites to meet the identified need over the Local Plan period, including the application site and another site which is also the subject of an application for a 6FE secondary school (Shaw Futures Academy predicted to open September 2019 subject to planning).

Following the approval to open the Bullers Wood Boys School Free School by the Secretary of State for Education a previous application on the St Hughes Playing Field site (16/03315) was considered at Development Control Committee 25th January 2017. This consideration immediately followed the decision at the same Development Control Committee to permit another secondary school, the 8FE Eden Park High School. The urgent need case for both schools was accepted at the January 2017 Development Control Committee, however, the St Hughes application was refused on a single highway ground, with minutes recording the understanding that Members would welcome a second (revised) application.

As indicated above the projected need by 2020 is 23FE with the majority 19FE required by 2018/19. As the table below indicates the existing permissions and 2 proposed secondary schools (including the current application) would provide 22FE by 2019.

Site / school	Permitted (FE)	To be determined (FE)	Proposals for opening (with sites or sites proposed)
<i>Bishop Justice</i>	2	-	<i>Expansion (2017)</i>
<i>Eden Park High School</i>	8	-	<i>New School (in temporary accommodation)</i>
<i>Bullers Wood Boys</i>		6	<i>Proposed new school (proposed opening in temporary accommodation on site Sept 2018 subject to planning permission)</i>
<i>Shaw Futures Academy</i>		6	<i>Proposed new School (proposed opening in temporary accommodation on site Sept 2019 subject to planning permission)</i>
Totals	10	12	

As a change from the previous application, the site at 1 Westmoreland Road which is also allocated within the Submission Draft Local Plan for secondary education has been brought forward as Shaw Futures Academy and is currently the subject of a live planning application. Assuming the Local Plan is adopted, should free schools having first received approval from the Secretary of State for Education,

seek to locate on the other outstanding sites, a secondary school build phase would be in the region of 18 months post planning permission (subject to the complexity of the site and potential phasing of opening). There is ministerial approval for a secondary school "Harris Sydenham" to open on a site within Bromley or Lewisham to provide for children from both boroughs, however no site for this cross Borough provision has been proposed by Harris.

Turning to the longer term education need in the borough, the figure of up to 34 Forms of Entry within the Council's Secondary School Development Plan 2016 is based on birth rates and school census information. This figure is based on the 5% that the Pupil Places Working Group agreed should be added to the base GLA school roll projections to provide a contingency for fluctuation in growth and parental choice. The 34FE relates to 1,022 Year 7 places required in 2022 compared with the base school population in 2014/15.

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

The Applicants in their submissions have also outlined this need and although this may be set out in a different format, the same evidence base and statistics has been used to set out their position and the case of need for educational sites and a free school on this site to serve the needs in this part of the Borough. The GLA in their stage 1 response states that the emerging Local Plan designation is now well advanced and the proposed allocation remains following the recent Regulation 19 consultation. As such, the provision of a secondary school on this site is strongly supported and responds positively to London Plan policy 3.18, which seeks to ensure the provision of new schools in response to local need.

Analysis and Conclusions

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

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

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

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

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

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

- There is a proven need for more secondary school places in Bromley to meet growing demand. This need has been demonstrated in both the Council's Secondary School Development Plan and Draft Local Plan.
- Early analysis and consultation with secondary schools indicated that whilst there was an opportunity to expand some local secondary schools if funding was available, this would not meet majority of the projected increase in the need for secondary school places. Currently the only agreed secondary school expansion scheme is at Bishop Justus School that has planning consent to expand from 6 to 8FE. That school is already operating at 7FE.
- There is a clear need for additional secondary school places In Bromley and Bullers Wood School for Boys is included within the Council's Secondary School Development Plan.
- Without the additional places at the proposed school, both the GLA school roll projections and Bromley's own projection model show a shortfall of at least 3 Forms of entry in September 2018. This number increases to 10 Forms of Entry once Council adds its 5% planning margin to its projections for contingency and choice. In addition, this is against the overall backdrop of the need for year 7 places increasing by over 600 places between 2016/17 and 2023/24.
- In terms of quality of provision, the proposed school is sponsored by Bullers Wood School for Girls which is rated by Ofsted as Outstanding.

There is therefore policy support nationally, regionally and in the draft Local Plan for the provision of necessary school places. No policy objections were raised with the demonstrated and imminent need for secondary school places in Bromley. The demonstrable need for places and the emerging Local Plan are material considerations to the overall determination of the planning application. This is

therefore considered a sufficient material consideration to warrant the setting aside of the adopted Urban Open Space Policy to facilitate secondary education in line with the draft Local Plan. Unless there are other material planning considerations which substantially outweigh the need for the provision the application should be supported.

Playing Fields and Sports Pitches

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

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

London Plan Policy 3.19 identifies that proposals that increase or enhance the provision of sports and recreation facilities will be supported; whereas those that result in a net loss of sports and recreation facilities, including playing fields should be resisted

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

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

Sport England have made representations in respect of the application being a Statutory Consultee. They have made a statutory objection to the proposal on the basis of a loss of part of the overall playing field area (in physical and functional terms), which includes the area to the south east of the trees which has been marked out for playing pitches in the last five years and the area to the north east which currently is not marked out for pitches. These are the two areas of the

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disused tennis courts and Sport England classifies these areas as part of the whole area of playing field. In addition, the bin store and sub-station are proposed to be built on the part of the playing field which contains a football pitch.

The applicants have been in discussions with Sports England and have put forward the view that tennis courts are not included in the definition of a playing pitch as identified in Sport England's 'Planning Policy Statement - A Sporting Future for the Playing Fields of England'. The Applicant submitted a schedule of existing and proposed areas of playing fields for consideration which totalled the existing playing fields and external hard and grass courts as 21,870.8sqm (notwithstanding Sport England guidance that refers to tennis courts not comprising playing courts/pitches). The proposed area of playing field and external courts totals 18,541.8sqm, with an additional 594.7sqm for the sports hall. This equates to a loss of 12.5%.

The Applicant considers that the proposed development meets exception E5, and therefore no objections should be raised by Sport England to the proposal. The Agent states that there will be no reduction or change to existing and potential pitch provision, furthermore the existing 3 hard court and 6 grass tennis courts, which are currently unused, will be replaced by 2 new external games courts and a four court indoor sports hall. There will also be an additional indoor activity studio. The Agent also goes on to state that significant site layout feasibility work has been undertaken to ensure the proposals optimise the various planning issues, including minimising any playing field lost in addition to impacts on important protected trees, ecological impact and the need to deliver a workable access, parking layout and school layout. The school are also happy for community use of the playing pitches and indoor facilities.

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

The GLA in their Stage 1 response notes that information regarding the change in playing field provision is addressed within the application submissions and whilst there will be a net loss, it is considered to be marginal at a quantitative loss of 15.2% excluding the indoor facilities and 12% including the indoor facilities, when considered against the wider education and community benefits to be gained. The proposed provision is comparable and provides qualitative improvements, including indoor provision, and as such is considered to meet the relevant Sport England exception test.

The GLA then go on to state:

'The siting of the school buildings has been designed so as not to impair the open nature of the site. For these reasons it is considered that the proposal satisfies the requirements of Policy 3.19 of the London Plan. Further, the reasons set out below are considered to justify that the exceptions of E5 of the Sport England Policy

document are complied with. These reasons also support the assessment previously made by Council Officers within the initial application's committee report.

- Tennis courts are not defined as 'playing pitches' within Sport England's Planning Policy document, and it is these that are being replaced.
- The existing courts are currently disused and have been for some time;
- The hard courts in particular are in an extremely poor state of repair;
- The proposed provision will represent a significant qualitative enhancement;
- The proposed indoor provision will be far more usable and not restricted to daylight hours only/weather conditions, as existing; and
- The small area of playing field lost is on the margins of the playing field area and not formally used as sports pitch or functionally for sport'.

The stage 1 response concludes that Officers from the GLA will work with Sport England and the Council to verify that the relevant Exceptions Tests and policy requirements of Sport England are considered to be met.

Despite the above comments from the GLA, Sport England maintain their objection and reiterate the revisions required in order to meet exception E5 including increasing the size of the indoor sports halls and re-locating the bin store and substation. Sport England go further and request a condition securing a community use condition should permission be forthcoming which shall be agreed by Sport England. As a result of Sport England's continued objection, should the Local Planning Authority wish to grant planning permission for the application, it would need to be referred to the Secretary of State for a determination as to whether it should be formally 'called-in'.

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

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

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

wider community. This is therefore considered to meet the policy requirements sufficiently, resulting in no net loss of pitches and further provision of sports and recreational facilities, as required under the above policies.

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

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

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

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

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

Highways and Transport

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

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Paragraph 32 that development should only be prevented or refused on transport grounds where the residual cumulative impacts are severe.

London Plan and UDP policies encourage sustainable transport modes whilst recognising the need for appropriate parking provision. Policies T1, T2, T3 and T18 of the UDP are relevant and car parking standards within the UDP should be used as a basis for assessment. The requirements for car and cycle parking are laid out within Tables in the London Plan, as subsequently amended. In addition, the requirements of Policy 6.13 require that 1 in 5 spaces should provide electrical charging points. Consideration should also be given to the location of the required 10% of wheelchair spaces and their proximity to entrances. Cycle spaces should also be provided under these policies.

The previous application was refused on the ground that:

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

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

The proposal is for a new secondary school for 900 pupils with 64 FTE staff. A number of documents relating to the potential highway impact of the proposals including a Transport Assessment (TA), a stage 1 Road Safety Audit and a Construction Management plan were included with the application. These have been updated / amended from the previous application with further information supplied during the course of the application.

The physical changes proposed from the previous application are amendments to the Chislehurst Road access, in respect of a section of footway and a raised crossing point, and the creation of an additional 15 drop off / pick up spaces within the site (from 10 to 25).

The TA, and subsequent information received, also included additional assumptions about trip generation and modal split.

Further to the original application, one additional access arrangement has been explored by the Applicant however this has not been modelled or tested and there is no detailed assessment as to why these have been discounted with a list of pros and cons for each option having being laid out within the Highways Feasibility Report. The applicant has discounted access from Bickley Road for a number of reasons.

Proposed Access Arrangements:

The Proposed Development includes the provision of a new vehicular access on Chislehurst Road as the main entrance to the site. A one-way system through the site, utilising the existing road currently on the site, will provide a 25 space parent pick-up. Two areas of parking are proposed on the site. One car park for 11 vehicles, including 5 disabled spaces, is to the north of the site by the proposed Sports Hall. The main car park is in the south west of the site with provision for 58 vehicles. There is a drop off / pick up area for 20 vehicles around the edge of the main car park. There are also 5 drop off bays provided near the Chislehurst Road access.

The application has been amended since the original application and now includes the insertion of a footway (approximately 1.8m in width) with safety railings (approximately 17m in length) and a raised crossing point from the Chislehurst Road entrance. An existing speed cushion near the junction with Hill Brow would be removed and sightlines would be provided by cutting back the existing vegetation. The impact this would have on the existing trees would be more significant than the original application, removing additional trees to make way for the extended footpath.

As with the original application, the new vehicular access proposed off Chislehurst Road has raised significant concerns regarding the impact of a new point of access. The Stage 1 Road Safety Audit raised a number of issues with the access. The main issue is the inappropriate parking in the vicinity of the access. The introduction of waiting restrictions is unlikely to deter short term parking associated with schools. Further to this a short section of footway is now proposed leading to a raised crossing point. Whilst this is significant improvement over previously proposed arrangements, pedestrians are still directed to a single point to cross the road and not in a more diffused manner as would be available if there were footways on both sides of the road.

The advice in Manual for Streets is that footway widths in excess of 2m should be considered for areas around schools. If parents are dropping off children on this side of the road they will end up walking in the road to the entrance. If they cross the road, the footway on the northern side is substandard. Widths of the footway on the northern side of the road, given in the TA, vary from 1.3m to 2.1m. In the morning peak the pupils heading towards Bullers Wood School for Girls already take up the footway for periods of time. The estimates in the TA are that 138 pupils will use this access, it is then equated to pupils/minute but it is likely that they will leave or arrive at the access in groups.

The assumption that goes with the layout and access arrangements is that parents will drive into the site to drop off and pick up children. There are 25 short term parking bays (increased from 10 within the previous application) and there is space within the site on the access road for vehicles to queue but much of this is single track. Despite the argument put forward in the TA, there is still the likelihood that parents will drop off and pick up pupils on-street. It is proposed that school staff manage any on-street parking issues. However, Officers are not sure that this happens to any great extent at any other school and it would need to be an

ongoing commitment. There are potential difficulties in securing and enforcing such an arrangement through the planning application process. The two nearest roads to the site, Chislehurst Road and Bickley Road, are likely to be the most attractive and parking here will interfere with the free flow of traffic. Chislehurst Road already has queuing from the mini roundabout going past the proposed access and this will only exacerbate the situation. The introduction of waiting restrictions is a possibility but it is unlikely to deter such parking unless there is a Traffic Warden present.

Following the original report where it was stated that exploration of alternative access should be considered, one additional access option has been discussed (which is summarised within the highways feasibility report) but the chosen solution with a new access from Chislehurst Road and the Bickley Road access used for exit purposes only is found to have the least environmental impact, are most technically sound, allows for traffic to be shared across both roads and is the applicant's preferred option from a highway engineering and safety perspective given the nearby junctions. It is noted however that alternatives have not been subject to a detailed assessment (including modelling) as to why they have been discounted.

Main School Development:

Applying the existing modal splits from the Girls School to the proposed Boys school would give the following results for the full school operation:

Mode	Pupils (900)		Staff (64)		Total
	%	Number	%	Number	
Car	13% (15%)	114 (137)	70%	45	159
Car share	7% (10%)	63 (90)	4%	2	65
Park & Stride	7% (6%)	64 (53)	3%	2	65
Rail	6% (16%)	50 (147)	7%	5	55
Bus	23% (24%)	208 (217)	1%	1	209
Cycle	0% (0%)	0	4%	2	2
Walk	42% (28%)	376 (254)	12%	8	384
Other	3% (0%)	27 (0)			27
Total	100%	900	100%	64	964

The figures in brackets show the modal split that was used in the previous application from earlier surveys. The car use has slightly declined. However, walking has significantly increased and rail use declined. This would imply a transfer from rail to walking which does not seem a likely scenario.

Park & Stride is a difficult category to analyse; it may depend on pupils' interpretation when they complete the travel survey or individual circumstances of how people are making existing trips. The assumption in the modelling is that these are trips already on the network and will not deviate from their existing route and pupils are dropped off at a convenient point to complete their journey on foot. These have been discounted from the new vehicle trip attraction. The "Other" category is unknown and together with the Park & Stride accounts for 91 trips in this assessment.

The TA then argues that these figures do not consider the effect of siblings sharing which would reduce the car trips by 5% and the effect of the proposed School Travel plan which would reduce trips by 14%, in line with the reduction achieved at the Girls School. In addition a third of pupils are assumed to attend the pre-school breakfast club which means they would arrive prior to the AM peak hour of 7:30am - 8:30am. These combined have the effect of reducing the number of pupil car trips from 114 to 62. These, together with staff trips, are the figures that have been used to model the AM peak hour.

The Travel Plan reduction seems ambitious particularly given that the modal split is taken from a school with a Travel Plan in place and where there would be siblings present. The breakfast club reduction was based on 'information from the girls school that 16% of pupils participate in extracurricular activities after school. It has been assumed that a similar number of pupils would also undertake activities prior to the school day, including the Breakfast Club. In addition to the standard breakfast club, the school confirmed that 17% of pupils are provided with a free breakfast. Therefore the total proportion of pupils anticipated to arrive at the site prior to the AM Peak is 33%'. Given the early start time for the Boys School there must be a question whether that is realistic assumption.

As part of the additional information supplied in September it was indicated that further surveys at the Girl's School had shown that 81% of the pupils arrived more than 15 minutes before school starts. If that were applied to the proposed Boys School only 19% or 22 vehicle trips would arrive in the modelled AM peak hour (7.30am - 8.30am). However the modelling did not use these further reduced flows so as "to represent a very robust scenario".

Capacity:

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

The roundabout junction of Bickley Road / Widmore Road / Chislehurst Road is overcapacity at present. There are often substantial queues on Chislehurst Road in the AM peak. The computer model, ARCADY, is generally accepted as becoming unreliable once the junction goes over capacity and so it is unclear how much weight can be given to the results. The model has been calibrated using a method which is not supported by TRL, who are responsible for the software. It does show, however, an increase in congestion at the junction.

The A222, which includes Widmore Road and Bickley Road, and is one of the main east - west routes across the Borough has been identified by the Council as having congestion issues. There have been a number of improvements along the route over recent years aimed at improving traffic flows. However there are likely to be concerns with any proposals that increase congestion on this route, either by giving more priority to side roads or generating a large amount of additional traffic. No mitigation measures have been explored.

For the traffic signal junction of Bickley Road / Pines Road / Bickley Park Road / Southborough Road / Page Heath Lane it is concluded that, due to the lack of data collected when setting up the traffic model, the modelling does not show if the junction is currently operating within its design capacity, or if it would operate within its design capacity following the implementation of the development. It also does not show how queuing may change as a result of the development.

The Chislehurst Road / Pines Road junction is also shown as going over capacity once the school is operational. No mitigation measures are proposed.

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

Draft Travel Plan:

If the development should gain permission a School Travel Plan would could be conditioned to be submitted. Transport for London stated that TfL welcomes the provision of a draft School Travel Plan which sets out relevant aims and objectives to encourage sustainable travel. Involvement in the TfL school travel planning accreditation scheme (STARS) is required and the Travel Plan should be regularly updated and monitored to ensure compliance with London Plan policy 6.11. The commitments towards Bronze and Silver status are welcomed.

A commitment to updating, monitoring and funding the travel plan and associated measures can be secured via condition.

Car Parking:

Two areas of parking are proposed on the site. One car park for 11 vehicles, including 5 disabled spaces, is to the north of the site by the proposed Sports Hall. The main car park is in the south west of the site with provision for 58 vehicles. There is a drop off / pick up area for 20 vehicles around the edge of the main car park. There are also 5 drop off bays provided near the Chislehurst Road access. Coaches will now enter the site for drop off and pick up from the Chislehurst Road access.

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

Servicing and deliveries to the site will take place from the new vehicular access on Chislehurst Road. All delivery and servicing vehicles can turn on site and leave via the same access. Swept paths were provided for a large refuse collection vehicle.

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Parking stress surveys were carried out in roads within an approx. 400m walk distance of the site in May 2016 and were supplied with the previous application. These were carried out between 0700-1000 and 1430-1830 at 30 minute intervals. They showed that even with the Chislehurst Road, Widmore Road and Bickley Road omitted from the results there were a large number of spaces available throughout the survey periods. However, these are the roads closest to the site accesses where any parking would be likely to take place and where parking is likely to cause interference with traffic flows. The nearest roads such as Pines Road and Shawfield Park where parking could reasonably be accommodated are already heavily parked. Hill Brow is also nearby but as it is unmade that may deter parking.

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

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

Construction Traffic Management Plan:

A CMP was supplied with the application. The proposal is to use the new Chislehurst Road access for construction traffic. The construction of the main school will take place while the first year intake (180 pupils) is on site. There will be 15 parking spaces for parent's drop off and pick up and 9 spaces for school staff accessed from Bickley Road. Site staff would park on the northern side of the site using the Chislehurst Road access.

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

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

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

In order to allow large vehicles to use the Chislehurst Rd / Bickley Road roundabout, turning to/from Widmore Road and Chislehurst Road, works would be required to the traffic islands at the roundabout. The islands are used by pedestrians, including pupils from Buller's Wood School for Girls, to cross the roads and they also control the deflection of vehicles around the roundabout. Complete removal of the islands for the duration of the works would not be acceptable. A Road Safety Audit was carried out on the options and the preferred option was over runnable islands with removable signage. This option would still require temporary traffic management to assist with the movements and to marshal pedestrians. Further detailed design would be required in order to make the option acceptable.

Public Transport:

Buses: There are over 200 pupils estimated to come to the school by bus. There are 2 bus stops in proximity to the Bickley Road access. However, there is no nearby crossing point and, given the level of traffic flow, some form of crossing would be needed to get pupils across the road. A puffin crossing has been proposed to allow people to cross Bickley Road. If this is to be taken forward it will need to be secured via a s278 or s106 agreement.

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

TfL's initial response indicated that, given the number of pupils, there will be constraints on the local bus services (routes 162 and 269). Pressure on these services could be relieved if the school start and finish times are staggered with the nearby Bullers Wood School for Girls. Failure to do so would require mitigation to meet the demand for bus travel.

The information now provided is that the Boys School would start at 07:45 and end at 14:20 when approx. 54% of the pupils would leave the site, with extra-curricular activities finishing at 15.20, when approx. 40% of the pupils would leave. The remaining 6% would leave later. The Girls School starts at 08:25 and finishes at 15:10 with after school activities finishing at 16:10 and 16:40. TfL have accepted this although there does appear to be an overlap.

TfL's response indicates that the result of the development is the need to relocate the existing eastbound bus stop (number 19745) and shelter (number 0106/1179) on the northern side of the A222 Bickley Road to a location 40 metres to the east. The bus stop on the southern side of the carriageway (number 19744) and shelter (number 0106/1203) would remain in its current location but a new shelter will be installed (extending from a 2 bay to a 3 bay) to meet the likely demand.

TfL have considered the likely impact on bus capacity and it is noted that given the number of pupils proposed there would be some constraint on the local bus services (routes 162 and 269). Pressure on these services could however be relieved should the school ensure arrival and departure times are staggered with the nearby Bullers Wood School for Girls. Failure to do so will require mitigation to meet the demand for bus travel in line with London Plan policy 6.7.

Trains: There are 50 pupils estimated to use the train, reduced from 147 in the previous assessment. The footway from Bickley station along Southborough Road towards Bickley Road is relatively narrow, measurements in the TA show going down to 1m. In the morning peak pupils will be going against the flow of commuters going towards the station and people will step into the road. The carriageway is also relatively narrow so they will be in conflict with vehicles.

Cycle Parking:

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

Highways are therefore satisfied with the level of provision being proposed, however the GLA and TfL required much higher standards in line with guidance in the London Plan . TfL states that the number of spaces should be increased to 129 spaces in line with the minimum standards. TfL states they appreciate the phased nature of occupation; as such a measure linked to the travel plan to deliver spaces ahead of each intake could be accepted to deliver 129 spaces by the 5th year of operation. This would require a minimum of 24 spaces per year group and spaces per staff to be determined.

Servicing:

Servicing and deliveries to the site will take place from the new vehicular access on Chislehurst Road. All delivery and servicing vehicles can turn on site and leave via the same access. Swept paths were provided for a large refuse collection vehicle.

A delivery area and bin store is to be provided adjacent to this access with a dedicated waiting and turning area. Swept paths have been provided for large vehicles and identify the acceptability for vehicles to turn on site and the provision of these facilities. Previous concerns regarding the management of the entrance have been addressed by the provision of a gated system and refuse vehicles being able to wait off the highway due to a set-back of 11.5m to the gates.

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

Other considerations:

A prefabricated building will be placed on the southern car park for a year to accommodate the first year intake of 180 pupils and 10 FTE staff while the main school is built. A total of 15 parent drop off spaces will be provided during the construction period. A further 9 spaces will be provided for the staff. The access from Bickley Road is only wide enough for one vehicle and it is not clear how this will work during drop off and pick up periods.

In order to estimate the modal split, the travel survey data from the existing staff and pupils at the Girls School from 2017 was used. The data from the Girls School would include siblings sharing so the figures for car sharing may be on the high side for a one year intake. The figures in brackets show the modal split that was used in the previous application from earlier surveys.

Mode	Pupils (180)		Staff (10)		Total
	%	Number	%	Number	
Car	13% (15%)	23 (27)	70%	7	30
Car share	7% (10%)	13 (18)	4%	0	13
Park & Stride	7% (6%)	13 (11)	3%	0	13
Rail	6% (16%)	10 (29)	7%	1	11
Bus	23% (24%)	42 (43)	1%	0	42
Cycle	0% (0%)	0 (0)	4%	0	0
Walk	42% (28%)	75 (51)	12%	1	76
Other	3% (0%)	5 (0)			5
Total	100%	180	100%	10	190

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

It is acknowledged that there is an extant permission in regard to Dial House, Chislehurst Road for a new brick wall with piers and railings and new vehicle and pedestrian gates to existing front garden area. Whilst the development is sited in close proximity to the raised crossing proposed on Chislehurst Road, the Highways Officer does not raise any concern regarding this, considering that the works could be implemented concurrently with some minor alterations.

Highways and Traffic Conclusions:

The local highway network is operating at or close to capacity and the traffic generated from the proposed school will only add to the sometimes substantial delays on the network. There are concerns that the modelling of the junctions does not reflect the existing situation or the likely impacts of the developments. There are no mitigation measures proposed.

The change in the modal split data from the Girls School between the survey used in the previous TA and this one shows the variation that can occur and that there must be robust assessment to look at the potential impact. There have been a number of assumptions made to reduce the estimated number of car trips both overall and in the peak hours that are questionable as to whether they are applicable to this site.

There is still the likelihood that parents will drop off and pick up pupils on the surrounding road network, in particular Chislehurst Road and Bickley Road, causing congestion and interference to the free flow of traffic.

The proposed access on Chislehurst Road has sub-standard pedestrian facilities. There are footway widths in the vicinity of the school likely to be used by pupils that are well below 2m.

The applicant has not demonstrated that the residual cumulative impact of the development will fall short of severe as outline in para 32 of the NPPF and the application should be refused.

Design, Layout, Scale and Impact

Design is a key consideration in the planning process. Good design is an important aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. The NPPF states that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.

The NPPF requires Local Planning Authorities to undertake a design critique of planning proposals to ensure that developments would function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development. Proposals must establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit; optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks. Developments are required to respond to local character and history, reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation. New development must create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and are visually attractive as a result of good architecture and appropriate landscaping.

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

The design, site layout and the configuration of the proposed building have been submitted in detail and remain predominantly unchanged from the original application. The proposal includes a combined school and sports hall building,

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which results in a compact form of development on the site largely on the site of the existing tennis courts. It is proposed to position the school building fairly centrally within the site and this siting allows for most of the existing trees to be retained which also act as a landscaping screen to the main buildings. Two sycamore trees will be lost to enable this proposed siting, which enables the building to be constructed on the most developed part of the existing site, thereby resulting as far as possible, in a reduced impact on the open nature and character of the site. It is acknowledged that further tree removal is proposed close to the vehicular access onto Chislehurst Road however this is not considered to materially alter the views from the neighbouring land given the extent and maturity of the remaining trees.

The form and massing of the proposed building on the site would largely utilise and fit within the topography of the site and the stepped form of the building would appear to be a sensible solution to the changes in ground levels, whilst providing the level of accommodation required. The proposed siting is, nevertheless, in close proximity to existing residential properties (35m) and this does raise concerns in respect of the impact on existing residential amenities and the impact on the street scene. The proposed sports hall will be approximately 10 metres in height and the main school building will have a total height of 12.5m. It is submitted that the proposed building would be largely screened by the existing mature trees of up to 30m in height; however, this in itself will not fully address the visual impact or the resulting impact on residential amenities.

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

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

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

The design and proposed external facing materials for the new school building are of an acceptable quality. The building will have a modern appearance that reflects its environment and is appropriate for its proposed use. Concerns have been

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expressed about the exterior cladding shown on the plans and whether it would be the most suitable material for this site. The longevity of the materials has been agreed (circa.40 years) and the lifespan and coloured cladding, broken up by glazing, alternative cladding and a grey brick to the lower elevation is proposed and considered acceptable. The choice of colours proposed will soften the impact of the building on the open nature and character of the site and help blend the building into its surroundings. On balance the appearance of the building would be acceptable.

From a planning (as opposed to technical highways) perspective, the additional access onto Chislehurst Road raises significant concerns regarding the amenity and landscape impacts of an additional access point. There will be an impact on the protected trees and root protection zones and it was previously stated that further tree removal wouldn't be encouraged however further trees are to be removed around the vehicular entrance to allow for the proposed pedestrian and highways modifications in this area (these have been noted as being more of the central woodland group already identified for removal due to the enlarging of the drop-off bays, but this is an area of general woodland vegetation, and does not contain any individual trees as defined by BS5837. I.e. they aren't large enough only juvenile). The increased pressure on retained trees also increases with the proposed hard surfacing on the site.

Visually, the proposed works to the Chislehurst Road frontage are likely to significantly change the character of this part of the site and the street scene. The character of this street will also alter significantly around the entrance to the site with a considerable increase in activity and vehicle and pedestrian movement. This is in addition to the existing use of this route by pupils travelling to Bullers Wood Girls School. The consultation responses from neighbouring residential properties, as with the original application, raise significant concerns regarding safety and the impact on residential amenities, both of which are considered within the highways information and noise assessment submitted.

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

It is proposed to reinstate an existing roadway within the site that will require resurfacing to be brought up to standard. This loops through the trees on the north western corner of the site and addresses the impact on the trees in close proximity and their root systems. These aspects increase the level of built development on site. As before, the plans submitted also result in an overly complicated layout that appears to be designed in part around reinstating this access road which results in limited benefits and is at odds with the need to minimise development. The proposed changes brought forward within this application do little to mitigate this issue, again taking the primary access from Chislehurst Road and utilising the existing roadway.

The GLA in the stage 1 response has stated that in respect of accessibility the previously raised concerns on inclusive design have been overcome via the submission of an addendum to the design and access statement.

In conclusion, the design, scale and layout of the buildings is considered on balance to be acceptable, with the building itself unchanged from the original application as such there are still concerns around the treatment of the Chislehurst Road frontage and this raises a question of whether overall the proposal can be considered to comply with Policy BE1 of the UDP.

Residential Amenity

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

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

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

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

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

Environmental Health Officer also raised no concerns to the proposal subject to conditions.

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

Trees and Landscaping

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

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

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

It is proposed to remove 5 'B' grade trees, a section of 1 'B' grade group, a section of 1 'B' grade woodland, 5 'C' grade trees and 1 'C' grade group to facilitate development and the impact to amenity should be minimal. Further tree removal around the entrance is proposed however this is considered to be within a group of trees already earmarked for removal within the previous application. Root protection zones (RPZ) have been identified and a preliminary tree protection plan has been produced. Any works within a RPZ which includes the existing access road and new footpaths would be conducted using a minimal dig methodology and use cellular webbing. Comments have been received regarding the inability to use a minimal dig method and the impact of this on trees T78 and T79 (Class B specimens) when constructing the proposed footpath as highlighted in the Transport Assessment. The Agent responded accordingly to this comment noting that they have stated honestly within the report that there is a potential risk of root damage, that it cannot 100% be confirmed one way or the other, what will or will not occur to these trees, until such time as the works are actually carried out. Because of this the Agent states the Arboricultural Report recommends that therefore in accordance with BS5837, a method of work should be adopted that will reduce and minimise the risk of damage to these roots. Whilst 'Minimal Dig' is the preferred option where is not viable BS35837 includes other protective measures that can and should be adopted. These can include for example;

- Excavation by hand digging only
- Having qualified arboricultural site supervisor on site during the works.
- Following the British Standard guidance on the cutting and treating of tree root etc.

The Tree Officer considers that the explanation received by the Agent covered all the points raised in this matter.

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

The Tree Officer states that this application is supported with an Arboricultural Impact Assessment (AIA) and tree survey information. Tree constraints have been addressed and protection measures considered as part of the AIA. The preliminary tree protection drawing illustrates the protection measures across the site. The proposals will see the removal of a number of C category trees that are insignificant and a small number of B category trees. The scheme allows for the provision of replacement planting as part of the new landscape plan. This is considered mitigation for the proposed loss of B category trees across the site.

Most of the consideration on tree impact has been covered by the supporting AIA and tree survey report, however, it is prudent that an Arboricultural Method Statement (AMS) is submitted under condition. It is also requested that more detailed information on tree species selection for the new planting scheme are also submitted under condition.

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

Temporary Accommodation and Phasing

Due to the timescales involved in this proposal there is a need to provide temporary accommodation on site in the form of a two storey mobile classroom structure, with associated, access, drop-off area, car parking and outside play space. Details of this provision and siting are included within the submission. There is a requirement to open the school in September 2018 (previously September 2017) and therefore a temporary building would be required for a period of 1 year which would be sited close to the Bickley Road boundary to accommodate up to

180 pupils. The temporary building is to be sited on the site of the main school car park and fenced off from the rest of the site during construction. Access arrangements from Bickley Road and a drop-off area (for 15 vehicles) are proposed for the temporary facilities.

The temporary two storey building measures 31.1m in width and 12.3m in depth with a maximum height of 6.9m (the external staircase platform measuring 3.8m in height). The siting of the temporary facilities are well screened from the road and will utilise the existing vehicular access into and out of the site. The classrooms are not considered to result in any undue impact upon residential amenity given the siting and size of the porta cabin and being of a temporary nature there is no objection to this aspect of the proposal for the first year during construction.

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

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

Planning Contributions

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

- Carbon offsetting contribution
- Contribution towards cost of repositioning north bound bus stop and extending the size of the south bound bus shelter on Bickley Road
- Potential contribution towards mitigation of capacity issues on the local bus network
- Highway puffin crossing works/contribution or similar
- Other highway works as may be required
- Travel Plan
- Reimbursement of the Councils legal costs.

Other Technical issues

Ecology and Protected Species (Bats)

The planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes; minimising impacts on biodiversity and providing net gains in biodiversity where possible. The NPPF addresses ecology in paragraph 109 which states, the planning system should aim to conserve and enhance the natural and local environment by minimising impacts

on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitments, which include establishing ecological networks that are more resilient to current and future pressures. Paragraph 118 of the NPPF also states that opportunities to incorporate biodiversity in and around developments should be encouraged.

UDP Policies NE2, NE3 and NE5 seek to protect wildlife features and protected species requiring development proposals to incorporate appropriate mitigation where damage may occur.

The site has the potential to support wildlife habitats and protected species. A Preliminary Ecological Appraisal and Bat Report have been submitted in support of the application to determine the ecological value of the site, its habitats and if there are any protected species on the site. The pavilion building and 27 onsite trees have potential to support roosting bats. Small areas of vegetation suitable for reptiles will be removed to facilitate development.

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

Other site enhancement measures include the establishment of a new hedgerow section on the northern boundary, establishment of rough grass margins and the inclusion of nest bricks within the new building for house sparrow and starling. Other precautionary measures are advised during construction stages and these could all be controlled through suitably worded conditions. The development would therefore be in accordance with the above policies.

External Lighting

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

The lighting scheme will use warm white LED lighting which shall be directed to ground and light spill minimised. This scheme addresses the use of the site by

bats and minimises light pollution to other parts of the site and the wider area addressing the requirements of para. 125 of the NPPF.

Air Quality

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

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

According to the submitted report, the development meets the London Plan requirements that new developments are air neutral and air quality impact in the local area as a result of this development is not expected to be significant however it has been noted that this report is out of date, having been authored in November 2015 and not taking into consideration the proposed development as submitted. An update to this report has been requested by Officers and the findings of this will be reported verbally to committee.

Acoustic Assessment

A noise impact assessment has been submitted which determines the appropriate levels of background noise and the noise associated with various aspects of the proposed use in accordance with policy 7.15 of the London Plan and the NPPF. The calculations identify that the internal noise levels for the school will be acceptable and due to the background noise levels there will be no requirement for enhanced acoustic glazing on the main school building, noise levels are expected to be limited to levels which are compliant with known standards when the proposed ventilation strategy of openable windows is implemented. The sports hall will have natural ventilation methods such as louvered openings and wind catchers and will require minimal attenuation.

The noise levels will comply with relevant standards and the impact of noise from the car park and usage of the external areas is expected to be minor adverse in the short term, reducing to negligible in the long term. It is confirmed that all the potential noise issues could be controlled through appropriate conditions in accordance with policy 7.15 of the London Plan.

The report does not, however, address noise from the school and site and its impact on local residents and their amenities which requires consideration however it is noted that the site is allocated as a school site therefore significant weight is given to this and any noise from the site can be adequately controlled through the submission of a noise management plan which would be conditioned should permission be forthcoming in order to comply with the requirements of Policy 7.15 of the London Plan.

Sustainability and Renewable Energy

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

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

The Energy Statement has considered the options for renewable energy, low and zero carbon technologies and demonstrated the feasibility of installing Solar PV panels as the most appropriate renewable energy solutions. The proposed installation of PV panels provides further energy savings and are expected to reduce Co2 emissions by a total of 21%. The Agent states that It has not been possible to improve the building performance to meet the 35% better than Part L target of the London Plan due to the following factors. The building has been carefully designed to best provide the needs of the school and comply with the requirements of the EFA. This imposes limitations that work against energy efficiency such as preventing the use of natural ventilation systems due to minimum internal supply temperatures. To provide all the facilities required the building needs to have a large amount of totally internal spaces that require mechanical ventilation and long hours of lighting. The load profile and location of the school also precludes the use of such energy saving technologies as Combined Heat and Power (CHP) and biomass boilers.

With these restrictions the Agent states that the only way to comply with the London Plan is to provide carbon offsetting payments in lieu of achieving the target. For the London Borough of Bromley as standard this is set a £60 per tonne of carbon dioxide over a thirty-year period. From the Part L calculations, the Target Emissions Rate (TER) for the school is 22.4kg/CO2/m2 per annum. To achieve a 35% improvement over the Part L minimum a further carbon reduction of 13.57% is required from the 21.43% currently achieved. 13.57% of the TER is

3.04kg/CO₂/m² per annum. The floor area of the building is 7068m² so the cost per annum is 21,484kg/CO₂ per annum which is 644,534kg/CO₂ over a thirty-year period or 644.534 tonnes. At £60 a tonne this equates to £38,672.03.

The GLA in their Stage 1 response states that the applicant has broadly followed the energy hierarchy set out in London Plan Policy 5.6. Further information relating to energy efficiency, further modelling to reduce overheating (more extreme weather scenarios), renewable energy technologies and overall carbon reduction measures is required to enable a full assessment against London Plan policy and to verify the carbon dioxide savings. The carbon savings fall short of the targets within Policy 5.2 of the London Plan. However, while it is accepted that there is little further potential for carbon dioxide reductions onsite, the applicant should discuss arrangements for meeting the shortfall with the Council.

The reduction in CO₂ emissions falls short of the required 35% required under Policy 5.2 of the London Plan therefore a carbon offsetting payment would be payable based on GLA rates as stated above. Officers consider that methods to reduce the carbon emissions on site have been explored and cannot be developed. The offsetting payment is considered a significant betterment to the original application where the contribution was not agreed by the Applicant. The Council consider the sum of money acceptable and should permission be forthcoming the contribution will be secured via the section 106 agreement.

Conservation Area

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

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

The proposal would preserve the character and appearance of the adjacent Conservation Area and accords with policies BE13 of the UDP and para.129 of the NPPF.

Archaeology

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

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

Flood Risk Assessment and Sustainable Urban Drainage Systems (SUDS)

The site is within Flood Zone 1 and at a low risk of flooding in view of the size of the site (over 1 ha) a Flood Risk Assessment was required. The proposed development results in no greater risk to surface water flooding. The proposed surface water drainage system includes infiltration drainage and onsite storage/attenuation in the car park. Surface water drainage rates will be retained at greenfield rates in line with guidance. The principle of the drainage strategy for the site is considered to fulfil SUDS requirements and is acceptable and in line with agreed standards. The Drainage Officer raises no objection subject to further worked up designs being submitted and conditions.

Contaminated Land

Report of Ground Investigation (July 2016): In 2015 a Phase 1 - Desk Study and Preliminary Risk Assessment and Phase 2 - Ground Investigation Report was undertaken on site which has been re-submitted as part of this application. The ground investigation comprised windowless sampler boreholes, probes and limited gas monitoring. The preliminary risk assessment and site walkover identified a number of potential contaminant sources and pathways to potential receptors. In summary, there is considered to be a low to moderate risk that a significant source of contamination exists below the site. Pathways by which exposure can occur

have been identified, as have receptors that could be adversely affected by contamination exposure.

A Phase 1 Desk Study and Preliminary Risk Assessment and Phase 2 Ground Investigation Report has accompanied the application which has identified hydrocarbon contaminants and a potential risk to human health. Further investigation and remediation measures are therefore required and it is likely that a suspended ground floor slab will be required. The Report of Ground Investigation submitted concludes that in summary there is considered to be a low to moderate risk that a significant source of contamination exists below the site. Pathways by which exposure can occur have been identified, as have receptors that could be adversely affected by contamination exposure. The Environmental Health Officer has commented on the findings of the reports and states that should permission be forthcoming an informative should be attached that should during the works on site any suspected contamination is encountered, Environmental Health should be contacted immediately. A further condition could be attached to any planning permission securing a contaminated land assessment and an appropriate remediation strategy, which could address all these aspects appropriately in accordance with Policy ER7 of the UDP.

Secured by Design

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

Environmental Impact Assessment

As the site has an area of over 1ha it was necessary to "screen" an application as to whether it requires to be accompanied by an Environmental Assessment under the Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2015. The screening process identified that an EIA was not required for the proposed school and a formal opinion was issued on 13/6/2017

Conclusion

The educational need for a new secondary school is fully acknowledged, and in the assessment of this application regard has been had to paragraph 72 of the NPPF (March 2012) which requires Local Planning Authorities to "give great weight to the need to create, expand or alter schools; and work with schools promoters to identify and resolve key planning issues before applications are submitted." The applicant did engage in pre-application discussions with the Council, and there has been regular dialogue throughout the application process in attempts to resolve the matters of concern with this application. In particular the applicant has been presented with all highways and traffic concerns that have been raised by the

Council's Highway Engineer and external highways consultants and given opportunities to respond to these.

In assessing this application, careful consideration has been given the government's planning and educational policy statement from 2011 in particular: "A refusal of any application for a state-funded school, or the imposition of conditions, will have to be clearly justified by the local planning authority. Given the strong policy support for improving state education, the Secretary of State will be minded to consider such a refusal or imposition of conditions to be unreasonable conduct, unless it is supported by clear and cogent evidence." Due regard should also be given to the Council's equality duty in relation to potential education provision for boys.

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

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

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

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

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

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- safe and suitable access to the site can be achieved for all people; and improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development.

- Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

The views of the Council's Highway Engineer are that the proposal will result in severe impacts on the highways network both in terms of capacity and flow, and also pedestrian safety, thus making the proposal contrary to Policy T18 of the UDP and paragraph 32 of the NPPF. The applicant has not demonstrated that the residual cumulative impact of the development will fall short of severe as outline in para 32 of the NPPF and the application should be refused.

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

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

Whilst the proposed development is, on balance considered to be acceptable in terms of all of the matters set out in the body of the report and related policies, unfortunately despite attempts to persuade the applicant to address these matters further, there remain a number of serious concerns about this specific proposal in relation to vehicular and pedestrian safety and the impact on the highway network. The Applicant, whilst amending the scheme from previously considered, has not adequately addressed these issues.

Given the strength of government policy supporting new school applications an independent consultant was engaged by the Local Planning Authority to provide reports to inform the highways aspects of the development specifically concerning the modelling of the highways. These reports conclude that the applicant has not demonstrated that the residual cumulative impact of the development will fall short of severe in the context of paragraph 32 of the NPPF, matching the conclusion of the report undertaken in respect of the original application.

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

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

The Mayor of London has stated that the application would need to be referred back to him for direction following the committee decision. Should the application be approved by Members, the application will also need to be referred to the Secretary of State as a result of Sport England objections.

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

RECOMMENDATION: APPLICATION BE REFUSED (SUBJECT TO ANY DIRECTION BY THE MAYOR OF LONDON)

The reasons for refusal are:

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