

**Application No : 19/00370/FULL1**

**Ward:  
Bickley**

**Address : St Hugh's Playing Fields, Bickley Road,  
Bickley, Bromley**

**Objections: Yes**

**OS Grid Ref: E: 541958 N: 169210**

**Applicant : DfE & Bullers Wood School for Boys**

**Description of Development:**

Stationing and temporary use of a modular building for educational purposes for a one-year period with associated access and parking.

Key designations:

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

Urban Open Space

**Proposal**

The proposal is for the Stationing and temporary use of a modular building to provide teaching accommodation for a maximum of 360 pupils (age 11-16) and associated staff for educational purposes for a one-year period commencing 1st September 2019, along with access and parking.

The temporary accommodation would be used by pupils and staff of the newly opened Bullers Wood School for Boys which is currently based at 1 Westmoreland Road until 31st August 2019. The proposed temporary accommodation would accommodate the school until the School's permanent building and facilities (allowed at appeal under planning ref.17/02468) are constructed.

The wider site (4.69ha) will accommodate the proposed temporary accommodation whilst retaining the existing playing fields, which will be shared between the girls and boys schools. This will also enable the approved main school building to be developed alongside the temporary occupation.

The applicant submitted the following statement on 26th March 2019 in support of their proposal:

“As discussed recently, at the time of submission of the temporary application, the construction programme was not finalised and the programmed delivery date for the permanent school was not confirmed. At that stage, September 2020 was still the aim, although it was known that there was some risk of an overrun. For that reason, the application as submitted states "The accommodation would accommodate 360 pupils and associated staff for a one-year period from 1st September 2019. In the event that the new School building is not ready for occupation by 1st September 2020, the one-year period and scale of accommodation proposed may need to be reviewed. The scheme as submitted here is in a form that would enable future modest expansion if so required (subject to planning) and for robustness, the submitted Transport Assessment also considers this potential scenario.”

The site is now allocated for a 6FE secondary school and benefits from detailed planning permission for up to 900 pupils. The proposed access arrangements for the temporary school are identical to those of the permanent school and accordingly, it is already established that in the event a further permission were required to extend the temporary period and increase pupil numbers up to 540, the access would remain suitable. As such, a temporary permission for one year and for 360 pupils, knowing an extension will most likely be required, does not prejudice that application as the principle issue is already established and agreed.

For the extended period, some additional accommodation will be required. The detail of this is yet to be determined and to amend the application now would therefore preclude delivery of the temporary school for September 2019, which is the priority and critical. For the reasons outlined above, it is also not necessary. As such, I can confirm that the application is as stated, for a 1 year period and for up to 360 pupils. It is very likely an extended period will be required and that will be subject to separate and future applications when the detail is fully known. The impacts of a 540 scheme in highway terms remain below what already has consent and is accepted. Notwithstanding this, any risk associated with this rests with the applicant as that application will still be considered on its own merits at that time.

With regard to 1 Westmoreland Road, in light of the SHaW appeal outcome, DfE has considered its potential use for Bullers Wood School for Boys. However, the only access to the building is from Sandford Road, which serves as the access point to the school and there is no space for construction vehicles, storage of materials and deliveries to occur without impeding the day to day running of the school, or the construction site. This means that ongoing construction works during school occupation is impossible.”

### Building and works

- Demolition of existing Air Training Corps building;
- Three storey modular building measuring 9.6m in height to provide 2,636sqm floorspace;
- The building would provide classrooms, science laboratories, a multi-use room, toilets and staff offices
- Pupils will have access to the existing playing fields together with new Asphalt hardstanding areas;
- Bin store enclosure;
- Internal 2.4m high black weld mesh fence to provide secure fence line.

## Access and parking

- New ingress only vehicle access into the site from Chislehurst Road leading to a new access road linking to the existing internal access track;
- Vehicular exit via the existing access onto Bickley Road;
- Internal one-way circulation system;
- This is identical to the proposed access approved for the permanent school;
- No pedestrian access is proposed from Chislehurst Road with access manned by school staff to preclude pedestrian access;
- New pedestrian/cyclist access off Bickley Road located approximately 35m to the east of the vehicular egress;
- Emergency vehicle access via Chislehurst Road, accessing the temporary building via the car park, and exiting onto Bickley Road;
- Construction access via the existing gate off of Bickley Road (with a temporary widening of the gate necessary by removing the existing pillar);
- 25 on-site car parking spaces and 3 accessible parking bays located within a new permeable, reinforced gravel car park to form collection point for SUD (drainage) system.
- Pupil drop-off area circulating car park to accommodate approximately 18 cars at any one time;
- Store for 36 bicycles adjacent to main school entrance.

The application was supported by the following documents:

- Planning Statement:

The statement sets out the overall policy background and identifies the planning considerations relevant to the application. It sets out the application and its background and the need for the temporary accommodation while the permanent school is being constructed. It considers that with regard to the principle of development, while the application site is designated as Urban Open Space, and would be contrary to Policy 7.18 of the London Plan, the Bromley Local Plan allocates this site for a new secondary school. Furthermore, the development now benefits from planning permission, meaning that the principle of secondary school development on the site is established. It identifies all of the other key planning considerations and concludes that the proposal accords with development plan policy.

It says that in the event that the new school building is not ready for occupation by 1st September 2020, the one-year period and scale of accommodation proposed may need to be reviewed. The scheme as submitted is in a form which "would enable future modest expansion is so required (subject to planning) and for robustness, the submitted Transport Assessment also considers the potential scenario".

- Design and Access Statement

This document covers a wide range of aspects in relation to the proposed design and access arrangements to the building and site. It addresses the background,

site analysis, proposed development including an assessment of the visual impact of the proposal and impact on the street scene, building and site access and circulation, appearance, landscaping and materials in all respects.

- Air Quality Assessment:

The proposed development falls outside of the Air quality Management Area (AQMA). The report concludes that the development will have a negligible impact on air quality therefore no mitigation is required. Instead, other measures such as providing cycle storage, implementing a travel plan and installing electric charging points are recommended. Furthermore, measures to minimise the impact of the construction phase on local air quality, including an assessment of distance from demolition and construction, should be implemented.

- Arboricultural Impact Assessment Option 1:

The scope of the report covers trees on and adjacent to the site. It is concerned with the impact the development may have on nearby trees and the effect retained trees may have on the development. All of the trees on the site are the subject of The Buller's Wood playing Field Tree Preservation Order (TPO). The site is not within a conservation Area.

As a result of the scheme, 6 trees are to be removed with 1 woodland area and 1 group to be partially removed. In addition to this, 2 groups, 1 woodland and 28 trees will require works within their Root Protection Zones.

The report makes a number of recommendations including that a detailed arboricultural method statement should be produced. Where archaeological or contaminated land reports and hard and soft landscape design plans are prepared for the site, these should be cross-referenced with the arboricultural impact assessment to ensure there are no conflicts in land treatments, recommendations or retention plans.

- Arboricultural Method Statement:

This report covers trees to be retained and sets out protection measures and working methodologies to ensure retained trees are not damaged or adversely affected by site activities during the demolition and construction works.

A total of 100 individual trees, 16 tree groups and woodland are the subject of this report which has been written in accordance with BS 5837.

It is anticipated that retained trees may require pruning works to facilitate the scheme. A number of trees also require pruning works for general maintenance purposes.

Tree protection barriers will be required as shown on the Tree Protection Plan (TPP). Ground protection will also be required within the RPAs of a number of trees. Where areas of new hard surfacing are required within the RPA of retained trees they should be constructed using a suitable 'no-dig' construction method.

Tree protection measures should be installed prior to any works beginning on site and prior to the delivery of plant or materials to the site.

- Archaeological Desk Based Assessment:

This desk-based assessment has not identified any currently known significant archaeological remains within the PDA, although there is the potential for buried archaeological remains to be present, and in particular remains associated with the Widmore estate, especially within the northern part of the PDA. Given the historic nature of Bickley, it is recommended that initially a geophysical survey should be undertaken as a first phase of a staged scheme of evaluation. The results of the geophysical survey can be used to identify what, if any, further works might be appropriate, pre- or post-determination of the planning application.

The identified tree-lines and wooded areas qualify as 'historically important' under the terms of the 1997 Hedgerows Regulations, and it is recommended that any changes to these assets should be avoided or minimised. A hedgerow survey could be included as part of any conditioned mitigation works.

- Archaeology Evaluation Report:

A total of seven features, probably dating to the eighteenth and nineteenth centuries were identified in trenches 2 and 11. It is likely that similar features survive across the southern half of the PDA. The features themselves are of minimal archaeological significance and have probably been truncated by slightly later quarrying or landscaping. There was no evidence for any earlier activity on the site.

The 2m deep terrace running roughly east--west midway across the site probably relates to Widmore House although its present level appears to be due to relatively modern landscaping. Disturbances from Widmore House may have removed archaeology from this area however as parts appear to have been cellared.

It seems quite likely that the site has been subjected to an episode of shallow gravel quarrying during the earlier nineteenth century, and quite probably later landscaping during the establishment of Widmore House and the landscaping of its grounds. However the precise date of this could not be established.

The results of the present works suggest the proposed development will have a minimal or negligible impact on the archaeological resource in the southern part of the site, and although less certain, this is also likely to be the case with the northern area.

- Bat Report:

A bat emergence survey was conducted on the sports pavilion in September 2018. No bats were observed emerging from the potential bat roosting features and it is noted that this building is not being demolished as part of the proposals for the temporary accommodation. Low numbers of bats were recorded foraging on-site

and the site is therefore found to be of low conservation importance for foraging bats at local level.

No further survey work, assessment or mitigation is recommended. However, the report recommends that no external lighting should be installed on site and, if required, only the minimum level required for site security/health and safety should be provided. Furthermore, all lighting should be 'bat-sensitive' including the use of narrow spectrum lighting with no UV content, or 'warm white' LED lighting. All lighting should be directed towards ground and light spill should be minimised through the use of hoods, shields and/or cowls.

- Construction Management, Delivery & Servicing Plan:

This document details the likely timescale and typical traffic movements associated with the construction of a temporary school at St Hughs Playing Fields and outlines proposals for any necessary mitigation. The scheme involves the delivery of unitised temporary accommodation blocks which will be placed on the car park area designated for the permanent school that is being built on the St Hughs Site. This document is intended to be a 'live' report, which will be updated and amended should the scheme design or construction programme change.

#### *Construction Access:*

The access to the site will be from the existing Bickley Road entrance. The existing gates will be temporarily removed and the right-hand pier and wall be taken down. At the end of the temporary period i.e when the temporary units are removed, these will be re-instated.

All traffic will enter through the gates into the avenue and turn right into the gap in the pollarded Poplar trees.

The timing of all deliveries will be made according to the conditions of the planning application, of which this document forms part of. The avenue is not wide enough for two-way traffic, therefore a Traffic Marshal / Banksman will be available to monitor and direct all vehicles entering and egressing the site. During the removal of the units, no access will be allowed during the egress times of the school. This is to ensure there is no conflict with operational school traffic.

The construction of the site will be undertaken in a staged manner, with each stage described below.

#### *Stage 1 - Access to site:*

The existing access will be widened, through the removal of the existing brick piers, which will be replaced once construction is complete. Vehicle swept path analysis is included at Appendix A, which shows that the required vehicles can access and egress the site safely.

#### *Stage 2 - Site set-up:*

The site setup will be delivered. This will be a local toilet unit. The main Site welfare will be situated on the main build site on the north of St Hugh's playing field.

### *Stage 3 - Site Preparation:*

An Attenuating soak away will be installed in the vicinity of what will be; the car park for the temporary accommodation, together with the foundations for the units. The component buildings will be delivered and installed on part of the car park for the permanent school. This will require the car park to be semi completed, the exceptions being; the wearing surface and kerbs repairs, prior to the delivery of the modules. This will also provide working platform for a 'lay down' area and provide a turning head for delivery vehicles

### *Stage 4 - Mobile Unit Delivery:*

Delivery of the temporary accommodation is envisaged to occur across two-week period. Due to the constraints of the site, a crane will be the principle means of distribution

### *Stage 5 - Completion of School Vehicular Entrance:*

The completed Temporary accommodation will have a vehicular access from the Chislehurst Road entrance; to the permanent school building, which will be constructed simultaneously. The entrance will be for Vehicular use only, as there will be no paved access internally to the mobile classrooms. The access will be shared by vehicles entering the construction site for the permanent school. The logistics of the set up are explained in the appendix

### *Environmental Impacts:*

This section of the report considers construction impacts that may arise on the local highway network, as well as increased vehicle emissions, waste associated with the proposed scheme and construction noise. The following mitigation measures aimed at reducing these impacts are proposed:

- Control of noise at source: Ensure all plant used is fitted with the correct silencer/acoustic baffle where applicable and that the equipment is in good condition and is well maintained;
- Where possible plan the site so noisy activities are furthest away from those who will be impacted upon by the noise generated;
- Noise levels to be regularly monitored by the site team both inside and outside the site hoarding;
- If a need arises for an especially noisy operation, information will be provided to London Borough of Bromley and the local residents so that any disturbance is agreed in advance of the work being carried out;
- Noise action zones to be identified within the site working areas if noise levels exceed 80dB
- Demolition works to be carried out in such a manner to minimise the levels of vibration generated and transmitted into adjoining structures and surfaces;
- Operatives using hand tools will be monitored daily to ensure they are not exposed to levels of vibration that could cause harm;
- Foundations will be designed to avoid percussive methods of installation;
- Damping down to be utilised to control any dust that is generated, consideration also to be given to control of any run off;

- Skips and lorries will be covered prior to exiting the site to prevent any material being blown from the top and Wheel washing will be provided at the egress point; and
- Air quality monitoring will be undertaken throughout the construction period;
- No fires are permitted on the site;
- All vehicle engines will be turned off when not in use or being unloaded; Start-up units will run on propane gas rather than diesel;
- The start-up units have battery backup to allow them to run overnight on electricity;
- Where possible electrical and battery powered equipment will be used;
- Temporary lighting will be in place for construction as necessary to allow works to be completed during construction hours. Security and safety lighting will be in place out of hours to ensure the safety of the general public;
- A scheme for recycling / disposing of waste resulting from demolition and construction works will be put in place.

The report concludes that the formation of the existing entrance on Bickley Road, will serve to ease the potential stress on the Chislehurst Road construction entrance, resulting from construction processes on the main scheme.

It is considered that the measures and control processes outlined herein will be suitable to overcome any constraints associated with the development. However, this document is considered to be a 'live' document and it will react / evolve in response to ongoing discussions with stakeholders, progression of the design information and engagement with the Kier supply chain.

- Ecological Impact Assessment:

The application site is of low ecological importance and no additional survey, assessment, or mitigation beyond the precautionary measures is required. The application site is not located adjacent to any habitat corridors or impact pathways. Based on these factors, an Ecological Impact Assessment (Low Impact Project) report has been produced. The main findings of this assessment are: -

- The site of is of low ecological importance, no additional ecological surveys are required;
- The Cadet's hut is found to be of negligible suitability for roosting bats;
- no ecological mitigation is required over and above the precautionary measures set out below;
- trees within the proposed access and construction footprint, small areas of scrub and c.0.04ha of Lowland Mixed Deciduous Woodland (which is a Habitat of Principal Importance) will be removed to facilitate the development;
- The application site boundary habitats (tree lines west and south) are suitable for foraging bats;
- Four invasive plant species listed by the London Invasive Species Initiative are present on-site;

The main recommendations of this assessment are: -

- Propped Heras fencing fitted with debris netting, should be fitted along the construction boundaries immediately adjacent to the retained woodland blocks in the north-west and south of the site and adjacent to the new access in the north of the site, for the duration of the demolition and construction stages;
  - The remaining north-west woodland block will be improved by compensatory understorey scrub and shrub planting and the creation of three log piles. In addition to this, the school will have access to a smaller area of habitat for recreational purposes;
  - Invasive plants will need to be removed to facilitate the development;
  - Any tree or scrub removal should be undertaken during the period mid-September to February (inclusive), which is outside of the typical bird nesting season;
  - If this is not possible, and vegetation clearance is required within March to mid-September, inclusive (typical bird nesting season) a check for nesting birds will need to be undertaken by a suitably experienced ecologist prior to vegetation removal. If any active nests are discovered, these will need to be retained and protected in situ until they are no longer in use by nesting birds;
  - External lighting should be minimised across the entire site, especially near trees south and west of the construction footprint - which are suitable for roosting bats;
  - Only the minimum level of lighting required for site security / health and safety should be installed on-site;
  - No trees suitable for roosting bats will be removed or significantly pruned to facilitate development;
  - In the unlikely event that a roosting bat is discovered prior to demolition of the Cadet's hut, all works should cease and an ecologist should be contacted for advice.
- External Lighting Statement

An external lighting strategy has been developed for the whole site, taking into account the environmental constraints. Each area to be illuminated has been considered and has been broken down into three main headings, roadways, car parks and pedestrian walkways.

*Roadway:*

Illumination of the roadways will be designed to minimise the impact upon bat roosts and foraging habitat to a level of 10 Lux. An increased level of 50 Lux will be provided in the turning area adjacent to the entrance of the site. The lights will be controlled by photocells mounted on the north face of the school, bringing them on at dusk and turning them off at dawn. A timeclock override will ensure lights are off between the hours of 22:00 and 07:00.

*Car Park:*

The temporary car park will be illuminated using post mounted LED Floodlights. The floodlights will be directed to avoid backward light pollution into neighbouring areas, thus reducing light pollution and overspill. The floodlights will also be mounted on 3m columns to reduce the light overspill. The illumination level within the car park will be to a level of 20 Lux average and will be time-controlled, as above.

*Pedestrian Pathways:*

The pathways around the temporary building will be illuminated by bulkhead style luminaires mounted on the building. For security reasons, the pathways around the building will be illuminated to a level of 15 Lux average.

The pedestrian area to the rear of the building will be illuminated using post mounted LED Floodlights. The floodlights will utilize optics that lead to efficient and directional distribution of light therefore eradicating backward light pollution into neighbouring areas, thus reducing light pollution and overspill. The floodlights will also be mounted on 3m columns to reduce the light overspill. The pathways around the site will be illuminated to a level of 10 Lux average. The lights will be time controlled as above.

- Flood Risk Assessment:

The site lies within Flood Zone 1 and therefore is at low risk from fluvial and tidal flooding. A soakaway in the playing field and porous paving in the southern car parking area are proposed which will have the capacity to receive all of the runoff water from the development. The proposed foul drainage could discharge into the existing sewers adjacent to the site in Bickley Road. This however would be subject to a capacity check and consent from Thames Water.

- Landscape Planning Statement:

This sets out the requirements with regard to different types of external space provision for a school with 540 pupils. The findings are that in most areas the development would over-provide, particularly in "soft social". The scheme is slightly under-providing in playing field but this is made up for by the extensive amount of soft social. The existing playing field, it says, will be unaffected by the development and will be able to continue to provide a number of Sport England compliant pitches to be marked out.

It sets out an indicative palette of landscaping materials. These include asphalt and concrete for footpaths, car parks and hard social/playgrounds/games courts, and welded and wire mesh with timber fencing.

- Noise Impact Assessment:

The report concludes that natural ventilation by partially open windows is suitable for the scheme. Furthermore, windows would be the only significant route of noise intrusion into the building. Compliance with roof rain noise criteria is also expected.

External noise levels have been specified to ensure that proposed plant does not result in significant adverse impacts on nearby sensitive receptors and it is anticipated that an assessment will be required once plant details and mitigation measures are known and further attenuation measures to protect residents from mechanical plant noise. It is anticipated that such an assessment would form a pre-occupation planning condition for approval of the scheme.

- Report on Ground Contamination:

There is considered to be a low to moderate risk that a significant source of contamination exists below the site and a moderate risk that a significant source of contamination exists off site. Pathways by which exposure can occur have been identified, as have receptors that could be adversely affected by contamination exposure.

The report makes recommendations with respect to the carrying out of the building works and the safety of construction workers. It further advises that the Contractor should seek advice if any unusual conditions are encountered, with respect to possible further investigation/analysis/remediation.

- Reptile Report:

A survey for reptiles was carried out between 25th July and 8th August 2018. No reptiles were recorded during the survey and it concludes that the site is of negligible importance for reptiles and future development is unlikely to impact reptiles. Landscape and vegetation maintenance practices prior to and during construction are recommended to reduce the likelihood of reptiles moving onto the site.

- Statement of Community Involvement:

The applicant held a public exhibition of the proposals in December 2018 which was advertised through leaflets delivered to the local area. Key stakeholders and councillors were notified with an email invitation. In total, 69 people attended the exhibition.

Of those who attended and completed a feedback form, 65% indicated opposition to the plans and 33% indicated support.

The main issues raised were concerns about traffic/parking and safety, indications of support for the plans, comments about the principle of a school on the site and comments about the appeal process for the permanent scheme.

In finalising the access arrangements for the temporary scheme, the applicant team have considered feedback from the public consultation, pre-application advice from LB Bromley planning officers, the planning Inspector's appeal decision for the permanent scheme and further analysis by the applicant own technical consultants of the practical/safety implications of the access arrangements.

The applicant will continue to meet with local groups and individuals as appropriate throughout this process.

- Secure by Design Criteria

This sets out the Secure by Design measures proposed to minimise the risk of crime and meet the specific needs of the development. It includes window and door specifications, details of CCTV at the site, access arrangements to the building, details of fencing around the perimeter of the site and lighting details (taking into account ecology constraints).

- Transport Assessment

A detailed Transport Assessment has been submitted which has assessed all impacts associated with the proposed scheme based on a scenario of 540 pupils, representing a worst-case scenario for robustness.

The scope of the assessment includes a review of the existing conditions of the site and the wider area; a review of the local highway network and road conditions in the surrounding area; junction capacity assessments and analysis of personal injury accidents data; a description of the proposed access, parking and drop-off arrangements and servicing/delivery arrangements; off-site highways works; expected trip generation; the anticipated transport and highways related impacts of the proposed school and the mitigation strategy for the development. A summary of the findings are set out below:

*Trip Generation:*

Travel surveys were undertaken at the temporary accommodation site at Westmoreland road in September 2018. However, as the results of these surveys presented low car share percentages they have not been used as part of this assessment. Instead the applicant had used the mode share split used within the previous application of the temporary accommodation.

- 47 pupil trips and 47 staff vehicle trips are anticipated for the planned capacity in 2019 (i.e. 360 pupils and 21 staff);

- 70 pupils vehicles trips and 20 staff vehicle trips are anticipated for a future higher capacity in 2010, if required and subject to planning permission

*Anticipated peak hour trips:*

The school will provide a breakfast club from 07:00 each day and the main school day would start at 07:45. In the afternoon school would finish at 14:20 with after school clubs taking place until 15:20 and sports activities continuing later. Based on the proposed school start and finishing times, the anticipated peak hour trips are anticipated to occur between 06:45 and 07:45 with the majority of afternoon trips occurring between 14:00 and 15:00. The busiest peak hour in both scenarios would be the morning peak hour.

The assessment concludes that the majority of pupils would either walk (42%) or travel by bus (23%). 27% would travel by car (7% of these participating in a car share and 7% would park and stride). Also, it is anticipated that the majority of staff would travel by car (77%)

### *Junction Capacity:*

Junction capacity assessment were undertaken as part of the appeal scheme to assess the impact of the permanent school (i.e. 900 pupils and 64 staff members) on the local highways networks. The report concludes that the use of the site for the temporary school with both a 360 and 540 pupils' scenario will have a lesser impact compared to the permanent school scenario with 900 pupils.

### *On-site parking capacity:*

A parking accumulation exercise for the anticipated use of the drop-off area during all peak hours based on a 540 pupil capacity was undertaken. The proposed level of on-site parking is found to be able to accommodate the anticipated demand, with the exception of two 15 minute periods in the afternoon when it is acknowledged that departure is a longer process and will result in spaces being occupied for longer.

### *Parking surveys:*

These were carried out in the surrounding streets and found that during the morning peak (07:30 to 08:30) and afternoon peak periods there is on average 486 and 450 free parking spaces on-street respectively. The School's anticipated levels of park and stride trips are anticipated to be low and would have negligible impacts for on-street parking in the area. In the worst-case scenario, the school would have a capacity of 540 pupils which would generate an increase in on-street parking demand by 39.

### *Mitigation:*

To try and mitigate the potential parking demand from a 540 place school, the School Travel Plan will feature a number of measures focused on limiting vehicle parking demand generated by the school. The School day would start at 6:45 for all pupils, however, staggered finishing times are proposed with pupils in years 7 and 8 finishing at 14:05 and those in year 9 finishing at 14:20. After school activities will also be available until 15:05 for years 7 and 8 and 15:20 for year 9. With these mitigation measures in place all demand for parking will be accommodated on-site.

### *Road Safety:*

The personal injury accident data for the area indicates that there are no existing issues with the highways network which require physical mitigation measures. However, it is recognised that there will be additional car, walking and cycling trips as a result of the temporary school and this may increase the likelihood of collisions between pedestrians or cyclists with vehicles.

The proposal includes the provision of a signalised crossing to serve pedestrians and cyclists who will be accessing the site via its pedestrian/cycle entrance

With the proposed mitigation measures in place, the report finds the proposed development acceptable on transport and highways grounds and its likely transportation effects to be negligible.

o School Travel Plan V2

The School Travel Plan (STP) has been produced in accordance with the TfL STARS method. The STP will be regularly monitored and reviewed for the lifetime of the development and the school will report regularly to the Council.

*Walking:*

The site is well connected by footways which are of mixed widths. Chislehurst road and Bickley road have footways of approx. 1.5 to 2m in width. The northern footway on Bickley Road is narrower than the southern section. On Pines road, footway of approx. 1.8 to 2m in width is only provided on the eastern side of the road.

*Cyclists:*

Chislehurst Road, Pines Road and Southborough Road (leading to Bickley Station) are all considered as suitable for cycling and roads to the north and south of the site are signed for use by cyclists.

*Public Transport Accessibility Level (PTAL):*

The PTAL of the site ranges from 2 to 3 indicating a 'poor' to 'moderate' level of accessibility by bus and train. The site is within acceptable walking distance of three bus routes and two national rail stations.

*Buses:*

Walking distances and walking times from nearby bus stops to the site:

Bus stop	Location	Direction	Walk distance (m)	Walk time (mins)
L	Bickley Road	Westbound	18	<2
K	Bickley Road	Eastbound	20	<2
C	Tylney Road	Northbound	650	8
F	Homesdale Road (North)	Southbound	700	8

Fig 1

The site is found to have adequate accessibility by public bus with four to six services available in all peak periods.

*National Rail:*

Bickley Station is located 600m to the south-east of the site with trains running at a frequency of around four trains per hour. Chislehurst Station is located 1.1km to the east and accessed by foot (approximately 22mins) or via bus routes 162 and 269. It is serviced by around 8 trains per hour.

#### *Off-Site Highways works:*

A new signalised pedestrian crossing is proposed on Bickley Road, to the east egress junction of the site. "School Keep Clear" lines and 'Keep Clear' box are proposed on Bickley Road and on Chislehurst Road.

#### *Objectives and targets:*

It is planned for the school to achieve Bronze accreditation whilst in temporary accommodation which is hoped to be achieved by:

- ii. Working with Bromley Council to support sustainable travel.
- iii. Educating students on road safety.
- iv. Educating both the students and their families as to the benefits and range of travel options available to them.
- v. Increasing the number of students and staff using sustainable travel.

The STP seeks to reduce by 6 per cent the number of car trips where pupils are the only passenger, while increasing active modes and public transport modes. This shift is considered reasonable on the basis that the school admission policy will favour students that live closer to the site as well as siblings of other schools within the same trust (i.e. Buller's Wood School for Girls). Additionally, as these targets are to be achieved within a one year period they are considered to be realistic.

The mode shift for staff aims at minimising the number of staff requiring off-site car parking. This will be achieved through encouraging car sharing and the use of sustainable modes. Walking, cycling, car sharing and public transport will be promoted to staff as preferred modes of transport via the proposed initiatives included in Section 9.0 of the report.

#### *Summary of measures and initiatives:*

- Design for pedestrian safety and accessibility
- Provision of accessible parking bays
- Vehicular access arrangements
- Off-site measures including new signalised pedestrian crossing
- On-site parking for parents
- The timetable of the school includes after school activities/ enrichment programme to smooth the profile of demand for travel across the peak periods
- Staggering of the school day with the nearby girls school
- Distance used as admission criteria to school.

#### *Implementation:*

Following the occupation of the new temporary accommodation, new travel surveys will be undertaken within the first three months and updated in the STARS system by the school. A member of staff will be appointed to promote and manage the STP.

- Energy Assessment

The submitted energy assessment addresses the requirements for energy and sustainability strategy assessment for the proposed Temporary Bullers Wood School for Boys building as required by the London Plan to support planning

applications. The use of passive ventilation measures, energy efficient lighting, heating and air source heat pump systems, and efficient u-values and air tightness have achieved a building emission rate as detailed in the submission and delivering an improvement of 37.5% over the minimum requirements of current Building Regulations.

## **Location and Key Constraints**

The application site is 0.78 hectares and currently forms the playing fields and partial sports provision for Bullers Wood Girls School to the north east of the site.

The site is situated off Bickley Road in Bickley, Bromley. The site is designated as Urban Open Space and 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 a classified 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 on the site.

There are 4 low key buildings on the site which are an Air Training Corps (Air Cadets) sectional building, a timber sports pavilion and two timber storage sheds. The Air Training Corps building will be demolished as part of these proposals however the sports pavilion is retained.

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

Nearby owners/occupiers were notified of the development in writing, a site notice was posted and a press advert was published.

At the time of writing 107 letters of objection have been received, predominantly from local residential properties close to the site, and 451 letters of support have been received, predominantly from prospective parents of the proposed boys school from a wide area.

A letter of support has also been received from Gareth Bacon, the Assembly Member for Bexley and Bromley.

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. Full text is available on the Council's website.

## Objections

Letters of objection submitted are summarised as follows:

### *Highways/traffic:*

- Increase in traffic and congestion
- Air pollution and reduced air quality
- Increase in risk of road accidents
- Risk of injury of pedestrians and school children
- Inadequate/narrow pavements
- Transport assessment flawed
- Pressure on existing road infrastructure
- Emergency vehicles unable to access local roads
- Over-spill of traffic/parking onto local roads and disruption to queued traffic on Widmore and Bickley Roads
- Regular integration with local residents on the traffic and transport situation would be beneficial
- Insufficient parking
- Lack of spare on-street parking in the area
- Restrictions around entrance/exit need to be properly enforced
- Parking intrusive for neighbouring residents
- Construction vehicles entering from Bickley Road will worsen congestion
- Crossing should be monitored by staff
- Access on Chislehurst Road not acceptable
- Two access options were presented during public consultation and residents views have been ignored
- Safety concerns/conflict due to construction of permanent school while temporary school is operational
- Construction traffic (for permanent school) should use Bickley Road
- Access arrangements are different for the permanent and temporary schools which is confusing and dangerous

- Non-construction traffic should be kept separate by building a new temporary access in Bickley Road, west of the proposed pedestrian entrance
- Existing entrance on Bickley Road has not been used regularly by traffic for 80 years
- No consideration given to improvements in Bird in Hand Lane
- No waiting zones/CPZ , traffic cameras should be implemented
- Additional maintenance and cost of repairs of private roads
- Traffic restrictions must be in place before opening of temporary school

*Environment:*

- Loss of playing fields/green space
- Loss of trees, hedgerows and wildlife habitat
- Impact on Urban open space
- Not in keeping with surrounding residential area
- Existing resources and facilities adversely affected
- Impact on street scene
- Carbon footprint
- Landscaping and tree matters must be considered

*Neighbouring amenity:*

- Loss of privacy
- Health risks
- Noise and disturbance
- Visual impact

*Need:*

- Temporary accommodation is unnecessary
- School should continue temporarily at 1 Westmoreland Road with works for extra classrooms being undertaken during the school holidays
- Other sites should be considered
- Not cost effective
- There are already enough schools in the area

*Other:*

- Conditions are required as stipulated by Planning Inspector Views of residents at public consultation stage have been ignored
- Attempt to set a precedent for a permanent school
- Exact location of permanent school not shown on plans
- Temporary school may need to house 3 year groups i.e. 540 students
- Further planning application will be required/may be sought retrospectively
- Early start time raises concerns for pupils and parents
- Poor environment for students due to construction site
- Pupils from outside Borough should not be allowed.

## Support

Letters of support received are summarised as follows:

- Welcome the relocation of the school to its permanent site
- Site already identified in Local Plan
- Permanent school already has permission
- Delay would cause further stress and disruption to pupils
- Existing site at 1 Westmoreland cannot accommodate another 180 pupils
- Current facilities at Westmoreland Road inadequate
- logical and most suitable site for the temporary accommodation
- More suitable and safer location
- No additional costs for the Council
- Will give pupils access to playing fields
- Opportunity for boys to see construction of school
- Educational benefits
- Stop wasting Council money and approve
- Should have a local school provided by the state
- Good to see applicant has consulted widely
- Lack of secondary school places in Bromley/provision for secondary age boys
- Early start and finish times means no additional congestion during peak times
- Less commuting time from school to sports lessons
- Majority of pupils would walk/catch bus
- much needed school in an area where there is little provision for secondary age boys
- There is lots of building of housing in Bromley and very little in terms of infrastructure
- Good to deal with any issues before permanent school is established
- Modular building will have minimal impact in terms of construction noise
- Can be quickly assembled
- No piling required which will help to minimise disruption to local residents during construction
- Pedestrian crossing will make it safer
- Aligns with access strategy for permanent which Inspector confirmed was acceptable
- allows trees to be retained
- will use the same access route as the permanent school
- access was considered safe by the planning inspector for a school of up to 900 pupils and the temporary school will have a much smaller population;
- there will be no conflict between pupils and the construction traffic for the permanent scheme.

## Comments from Consultees

### Highways:

The previous application for the permanent school with 900 pupils with 64 FTE staff was allowed at appeal. The first year intake of the school is currently based at Westmoreland Road.

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 application is for a temporary building to accommodate 360 pupils. A number of documents relating to the potential highway impact of the proposals including a Transport Assessment (TA) and a stage 2 Road Safety Audit were included with the application.

Given the application for the full school of 900 pupils has been allowed, I am assuming that the issues of trip generation, junction capacity etc. are deemed to have been dealt with and are therefore not an issue for this smaller school application.

The construction management plan provided for the main school building indicates that the proposed finish of construction is Christmas 2020. This would mean that the 3rd year entry, giving a total of 540 pupils, would need to be accommodated in the temporary building for at least a term.

Using the modal split from the main school application would give the following trip generation:

Mode	2019		2020	
	Pupils	Staff	Pupils	Staff
Walk	151	3	227	3
Cycle	0	1	0	1
Car	47	15	70	20
Park & stride	25	1	38	1
Car share	25	1	38	1
Bus	83	0	124	0
Rail	22	1	32	2
Other	11	0	16	0
<b>Total</b>	<b>360</b>	<b>21</b>	<b>540</b>	<b>28</b>

Fig 2

A condition (5) was placed on the permission for the main school regarding the school start and finish times following TfL's comments about the capacity of buses

and staggering the times of the school day from that at the Bullers Wood Girls School:

*Excluding the Breakfast Club, after school clubs and school extra-curricular activities, the school day shall start no later than 0745 and finish no later than 1420.*

The assumption for the temporary school is that is that there would be a breakfast club starting at 0700 and after school clubs starting at 1420 and sports activities starting at 1520.

### *Parking*

There are 25 marked out parking spaces proposed along with a drop off / pick up area for parents which will accommodate 18 vehicles. Various assumptions are made about the arrival and departure of parents and staff cars given the pre and after school activities below.

Out of the pupils attending breakfast clubs (i.e. 34% in total), 50% arrive between 06:45-07:00 and 50% arrive between 07:00-07:15; departures are assumed to occur in the 15 minutes period following the respective arrivals.

Out of the pupils attending the main school day (i.e. 67% in total), 10% arrive between 07 06:45-07:00 and 50% arrive between 07:00-07:15; this is a robust assumptions as in reality it is expected that because of the presence of a breakfast club, pupils arrivals would be spread over the all hour. Departures are assumed to occur in the 15 minutes period following the respective arrivals.

In the afternoon, out of the pupils not attending afterschool clubs activities (ie 54% in total), 90% of the parents' cars arrive between 14:00-14:15, while 10% of the parents' cars arrive between 14:15-14:30. Departures are assumed to occur in the 15 minutes period following the respective arrivals.

Additionally, out of the pupils attending the afterschool club - enrichment activities (i.e. 40% in total), 90% of the parents' cars arrive between 15:00-15:15, while 10% of the parents' cars arrive between 15:15-15:30. Departures are assumed to occur in the 15 minutes period following the respective arrivals.

The TA only applied these figures to the 540 pupil scenario which showed there will be an over capacity of the car park of 11 vehicles between 14:00 - 14:15 and 2 vehicles between 15:00 - 15:15. In the morning drop offs tend to be quicker so there was no over-capacity issues. It is suggested in the TA that mitigation measures in the School Travel Plan will reduce the need for parking and so the car park will not be over capacity. In any event if vehicles enter the site and the car park is full I assume they would queue on the internal access road. Mention is made of the previous parking surveys which showed there was spare capacity for parking on the nearby road network. However the 2 closest roads, Bickley Road and Chislehurst Road are not suitable for increased on-street parking.

### *Access arrangements*

Construction vehicles associated with the temporary building (not the main building) will access and egress the site from the existing gate on Bickley Road. In order to allow this part of the gate will be removed to widen the access and will be replaced after the temporary building is removed. Parking for the construction workers should be accommodated on site as the car park area for the temporary school will be available. The Construction Management Delivery and Servicing Plan para 4.2.4 indicates "several parking spaces are provided on site" but this should be firmed up to accommodate all workers vehicles.

There will be no pedestrian access to the temporary school from Chislehurst Road, the access will be from Bickley Road.

Parents and staff cars will enter the site via the Chislehurst Road access and exit to Bickley Road. Construction traffic associated with the main school build will access and exit the site via Chislehurst Road. The previous proposal had separated the temporary school traffic and the construction traffic. This potential conflict is not covered in the TA. In the Construction Management Plan submitted for main school building it indicates that Traffic Marshals will be on duty at the entrance. The plan on page 11 of this CMP indicates the school visitor traffic will, subject to Banksman control, have right of way, with construction traffic being held back. The site deliveries are shown between 08:30 and 15:30 so there is potential conflict between temporary school traffic and construction traffic during the afternoon pick up period. This was mentioned in the introduction to the Stage 2 Road Safety Audit but not raised as a problem. I would therefore not raise this as an issue.

### *Highway measures associated with the main school*

There were various highway measures that were agreed as part of the main school proposal that are referred to with this application which will be provided via a s278 agreement in due course. These include the signalised crossing on Bickley Road, alteration of the adjacent bus stop and footway / traffic calming measures on Chislehurst Road. The timing of the introduction of these is important. There will be no pedestrian access via Chislehurst Road so those measures are not critical. However, the Bickley Road works including the crossing need to be in place before the temporary school opens.

### *Cycle parking*

A total of 36 cycle parking spaces will be provided. This will more than accommodate the estimated number of cyclists to the site.

### *Conclusions*

The number of pupils and staff associated with the temporary school for 2 years is less than the 900 who will attend the main school allowed at appeal. The trip generation and effect on the highway network will therefore be correspondingly less.

The new agreed access on Chislehurst Road and the highway works on Bickley Road associated with the main school will be installed prior to the opening of the temporary school.

The pedestrian access to the temporary school is from Bickley Road. The vehicle access is from Chislehurst Road and the egress is to Bickley Road. The school will enforce the "no pedestrian access" from Chislehurst Road and the contractor for the main school will ensure the separation of temporary school and construction traffic at the Chislehurst Road access.

If the temporary school is permitted and there is an application for a third year of pupils to be accommodated at the site, there will be a year or so experience of how the site is working.

I would not raise a highway objection to the application.

#### Transport for London (TfL):

Please note that these comments represent the views of Transport for London officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. These comments also do not necessarily represent the views of the Greater London Authority.

The draft London Plan was published on 29 November 2017 and sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. TfL expects all new planning applications to give material consideration to the policies set out within this document, noting that the decision-maker is to determine the balance of weight to be given to adopted and draft policies.

#### *Site Context*

The site is located within a parcel of land that is bound by the A222 Bickley Road to the south, Chislehurst Road to the west and Pines Road to the east. The closest section of the Transport for London Road Network (TLRN), the A21 Kentish Way, is located approximately 1.4 kilometres to the west of the site. Bus services can be accessed within 50 metres of the site, from 2 bus stops (L and K), which are served by a total of 2 routes (162 and 269). The site is also approximately 620 metres from Bickley station, providing access to Southeastern and Thameslink services. The site has a Public Transport Access Level (PTAL) of 2-3, on a scale of 0 to 6b, where 6b represents the greatest level of access to public transport services.

The proposal is for the erection of a modular building on the St Hugh's Playing Field to provide temporary accommodation for Bullers Wood School for Boys; pending the construction of the permanent school approved through appeal (ref APP/G5180/W/18/3203724 - 17/02468/FUL). The temporary school will accommodate 360 secondary school pupils for a one-year period, starting in

September 2019. The permanent school, when completed, will accommodate 900 pupils.

### *Site Access*

The main vehicular access to the site is proposed from Chislehurst Road to the north west of the site. This will form an 'in only' vehicle access, with vehicles exiting onto the A222 Bickley Road. This access arrangement is identical to the proposed access approved to serve the permanent secondary school that will eventually occupy the site (application reference 17/02468/FUL).

Access for pedestrians and cyclists will be taken from the A222 Bickley Road via a footpath that will be segregated from the main vehicular access. To ensure the safety of pupils, the main vehicle access will be managed by staff, which is welcomed in line with the Mayor's Vision Zero Approach.

A signalised pedestrian crossing has been secured as part of the planning permission for the permanent scheme. This crossing will also require the relocation of the existing bus stop on Bickley Road, which was agreed with TfL. The relevant highway works will be undertaken under a Section 278 agreement with the Council, as Highway Authority, who should contact TfL with regards to the works to install the signals and relocate the bus stop. All costs incurred by TfL in relation to the design and delivery of these works, including commuted maintenance should be covered by the applicant.

### *Trip Generation*

The trip generation and mode share was considered within the Transport Assessment for the permanent scheme, which was accepted. It was concluded that since the site is not within close proximity to the Transport for London Road Network (TLRN) it is unlikely that there will be a significant impact to the TLRN. This is also applicable for the temporary school proposed in this application.

The impact on local bus capacity is also expected to be minimised by the staggering of the school day with the nearby Bullers Wood School for Girls. This Page 3 of 4 was requested by TfL in relation to the permanent scheme, and should be implemented for the temporary school.

### *Car Parking*

A total of 28 car parking spaces are proposed to serve the temporary school site, and this total include 3 Blue Badge only spaces. A drop off area accommodating 18 cars is also proposed. It is understood that the permanent scheme will include 69 car parking spaces (including 5 Blue Badge only spaces). In the absence of specific car parking standards for schools in the draft London Plan, TfL considers the proposed level of parking for the temporary school to be acceptable as it is proportionate to what will eventually be provided for the permanent school.

### *Cycle Parking*

A total of 20 cycle parking spaces are proposed to serve the temporary school, with these being provided through covered Sheffield stands. The number of cycle parking spaces however is not compliant with draft London Plan Policy T5 minimum cycle parking standards. For compliance, a minimum of 47 long stay and 3 short stay cycle parking spaces should be provided. The cycle parking should be located in a sheltered and secure location, and should meet standards set out in Chapter 8 of the London Cycle Design Standards.

### *Travel Planning, Servicing and Construction*

A Travel Plan (V2) has been prepared for the site to encourage staff and visitors to travel by walking, cycling and public transport. I've reviewed the School Travel Plan attached as part of application, and consider it to be sufficiently detailed. No further information will therefore be required.

Given the nature of the development TfL agree with Bromley Council's highways officer that an implementation condition including the need for monitoring and updating would be acceptable.

A draft Delivery and Servicing Plan (DSP) and a draft Construction Logistics Plan (CLP) have also been submitted as part of this application. Should permission be granted for the above development, in accordance with draft London Plan policy T7 a full CLP and DSP should be secured by condition and discharged in consultation with TfL. The CLP should be prepared in line with TfL's latest guidance.

### *Summary*

In summary, the number of cycle parking spaces should be increased by 30 for the proposals to be fully compliant with the strategic transport policies. Planning obligations in relation to the Travel Plan, DSP and CLP should also be secured.

I trust this provides you with an understanding of TfL's current position on this application and we would welcome acknowledgement from you that these comments have been received and are being considered. Please do not hesitate to contact me if you have any queries.

### *Updated TfL comments following submission of update Construction Management Plan on 1st April:*

Thank you for providing the updated CMP with the additional information as requested. As such, TfL is supportive of the application without a requirement for a pre-commencement condition.

A couple of points just to note:

- For any Abnormal Loads, TfL should be consulted by the developer/contractor to agree the proposed routing.
- Construction deliveries should be timed outside of the network peak hours.

- It appears that on exiting the site, larger vehicles would encroach the opposite side of the carriageway. Therefore it is recommended that trained banksmen are present to assist with the safe manoeuvre of vehicles.

Sport England:

It is understood that the proposal prejudices the use, or leads to the loss of use, of land being used as a playing field or has been used as a playing field in the last five years, 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 (in particular Para. 97), and against its own playing fields policy, which states:

'Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field and remains undeveloped, or
- land allocated for use as a playing field

unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.'

Sport England's Playing Fields Policy and Guidance document can be viewed via the below link: [www.sportengland.org/playingfieldspolicy](http://www.sportengland.org/playingfieldspolicy)

I write further to my email of 28th February 2019. Further to my email the applicant has advised that planning permission for the location of the new school has been granted.

The proposed development results in a minor encroachment onto an area that has in the past been used as playing field. However, having considered the nature of the playing field and its ability to accommodate a range of pitches, it is not considered that the development would reduce the sporting capability of the site. This is because the proposed development of a school was granted planning permission following an appeal. The site layout of the site will therefore be subject to change when the School proposals are implemented. It is further understood that there are no community groups currently using the site as these have been allowed to use the Girl's School during the build process. In allowing the planning appeal, a planning condition was attached to the planning permission that will require a community use agreement to be put in place when the facility opens.

Consequently, Sport England are of the view that the proposal broadly meets exception E3 of our playing fields policy, in that:

'The proposed development affects only land incapable of forming part of a playing pitch and does not:

- reduce the size of any playing pitch;
- result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);
- reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;
- result in the loss of other sporting provision or ancillary facilities on the site; or
- prejudice the use of any remaining areas of playing field on the site.'

This being the case, Sport England **does not wish to raise an objection** to this application.

#### Environmental Health:

I have considered the application and have no objections within the grounds of consideration. Noise conditions are recommended.

#### Tree Officer:

The Tree Protection Plan (TPP) is similar to that approved during the appeal decision related to application 17/02468/FULL1. Precautionary methods have been afforded to all retained trees of significance. My previous comments in relation to application 17/02468/FULL1 remain valid. Conditions set out as part of the appeal decision cover a detailed landscape scheme. I therefore consider the landscape masterplans supplied in support of this application sufficient for the purposes of the temporary scheme. Full consideration of landscaping will be reserved for discharging conditions associated with planning permission 17/02468/FULL1.

The TPP has not made reference to the create of a temporary access arrangement in the north west corner of the site. This must be included in a revised submission to ensure the impact is addressed. The tree survey data for the area does enable formal arrangements to be confirmed under condition.

An Arboricultural Method Statement (AMS) is required to achieve permission. This is the last opportunity to highlight any necessary tree works. Further submission would require variation to approved plans.

If landscaping is conditioned as part of the application, it should complement that submitted under reference 17/02468.

Further to these comments the applicant has confirmed that there is no temporary access proposed in the north-west corner and the access proposals are consistent with the approved main scheme permission and have submitted a revised plan to reflect this.

*Updated Tree comments further to additional tree information submitted 26th March 2019:*

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 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.

An Arboricultural Method Statement (AMS) and tree protection details have been supplied in support of this application. Some variations have been made since the previous schemes. The changes made have been explained by the retained arboricultural consultant. The northern grouping of trees labelled G6 will be managed to provide essential visibility splays. I have inspected these trees and confirm that the overall impact on the trees forming boundary screening will be tolerable. In mitigation, tree planting is possible between the boundary and sports pitch to form a denser buffer zone. This can be represented further on landscape details.

The clearance pruning noted on the Tree Protection Plan (TPP) for tree grouping G12 would be tolerated and would focus on small trees/scrub not old enough to be surveyed as individuals.

Turning to landscaping; the Landscape Master Plans give indicative information. The other landscape concepts and details of hard landscaping have been outlined. A planting plan and schedule would be required to confirm species selection and ensure planting is included to a satisfactory degree and standard. Buffering boundary treatments should form a focus for replacement tree planting.

Due to the possibility of further tree pruning to accommodate clearances and the generic outline of pruning on the TPP, an updated tree surgery schedule should be requested under condition.

*Tree comments in relation to application 17/02468/FULL1:*

*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 out 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.*

#### Drainage:

The submitted Flood Risk Assessment carried out by Evans & Langford LLP with Ref No. 13791 Rev A dated October 2018 attenuation soakaway, permeable paving and swale to store surface water run-off is acceptable. Surface water drainage condition recommended.

*Updated Drainage comments further to the revised Drainage Strategy received on 7th March:*

I am happy for the submitted drainage strategy to be implemented as proposed in the submitted "Temporary Classrooms External Works & Drainage" Plan DRW No. 08473-EAL-00-XX-M2-C-0007 Rev D dated 07/07/2017.

## Thames Water:

### *Waste comments*

Thames Water would advise that with regard to waste water network and waste water process infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

With regard to surface water drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.

<https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewaterservices>

### *Water Comments*

On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application.

Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

## Historic England:

The Greater London Archaeological Advisory Service (GLAAS) give advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

NPPF Section 16 and the London Plan (2011 Policy 7.8) make the conservation of archaeological interest a material planning consideration. NPPF section 189 says Applicant's should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest. A field evaluation may also be necessary.

I have looked at this proposal and at the Greater London Historic Environment Record but I need more information before I can advise you on the effects on archaeological interest and their implications for the planning decision. If you do not receive more archaeological information before you take a planning decision, I recommend that you include the applicant's failure to submit that as a reason for refusal.

It is noted that an archaeological desk-based assessment dated October 2018 has been submitted as part of the application documentation. The proposed building location is to the immediate south of a former quarry and part of an area currently

the subject of archaeological trial trench evaluation by the Canterbury Archaeological Trust. As the result of this evaluation work will have a direct bearing upon the current proposal, it is recommended that the current application is deferred until the result of the evaluation can be considered and inform whether there is an archaeological interest and if so how it may be mitigated.

Because of this, I advise the applicant completes these studies to inform the application:

I will need to agree the work beforehand and it should be carried out by an archaeological practice appointed by the applicant. The report on the work must set out the significance of the site and the impact of the proposed development. I will read the report and then advise you on the planning application.

NPPF paragraphs 193 - 194 place great weight on conserving designated heritage assets, including non-designated heritage assets with an archaeological interest equivalent to scheduled monuments. Non-designated heritage assets may also merit conservation depending upon their significance and the harm caused (NPPF paragraph 197). Conservation can mean design changes to preserve remains where they are. If preservation is not achievable then if you grant planning consent, paragraph 199 of the NPPF says that applicants should record the significance of any heritage assets that the development harms.

This response only relates to archaeology. You should also consult Historic England's Development Management team on statutory matters.

*Updated Historic England comments further to the submission of the Phase 1 Archaeological Evaluation Report on 26th March:*

Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.

It is noted that the archaeological evaluation report dated March 2019 by Canterbury Archaeological Trust has been submitted as part of the application documentation. The scope of the evaluation was to address the wider site as well as the area specific to this application.

Having considered the document I am happy to recommend its approval subject to the receipt by this office of the document related shape-files so that the information can be migrated to the Historic Environment Record for Greater London.

**No further assessment or conditions are therefore necessary.**

Please note that this response relates solely to archaeological considerations. If necessary my Historic Buildings and Areas colleagues should be consulted separately regarding statutory matters.

## Designing out Crime Officer:

Due to the complex requirements for schools generally, the potential vulnerability of pupil and staff safety and with this application in particular incorporating the modular building, security must be a major consideration.

I can confirm I met with Keir construction 18th December 2018 and the development and the security requirements discussed.

### *The structure*

From the meeting, the existing pre-built structure construction was advised in detail, which it is believed is to generally a reasonable standard and does incorporate a number of security measures, but does not comply fully with the requirements for Secured by Design.

However, there are a number of additional features and measures that have been discussed, and should be incorporated to reduce the opportunities for crime and dis-order at this site.

- The existing windows are not tested and accredited, so steel window grills to be fitted to all ground floor and easily accessible windows. Windows that cannot be grilled, to have glazing to BS 356:2000 P1A as a minimum.
- All doorsets into the structure containing euro cylinders are to be fitted with either 1 star cylinders and two star handles, or three star cylinders.
- CCTV is to be installed to protect the external perimeter and vulnerable locations around the structure.
- Opportunity for access under the structure to be removed by installation of a secure skirting to be fixed to the complete base.
- Visitors into the building by a single main entrance leading into a secure lobby controlled by school staff
- All doorways into the fabric of the structure to be illuminated.

### *The site*

The layout and design has been discussed, particularly around entrances and exits and boundary treatments, to confirm or in addition I would request the following:

- The site to be protected by a secure boundary treatment and gates, which can be locked when the site is closed. This to include a 1.8m perimeter boundary close mesh wire fence preventing rear access to the structure.
- The staff car park to be suitably lit to BS 5489:2013, bays clearly marked

- Cycle racks to be overlooked by active rooms, the tube wall thickness a minimum of 3mm steel and sunk 300mm into a suitable anchor.

I would request a planning condition be attached to this proposal as suggested below:

The development hereby permitted shall incorporate measures to minimise the risk of crime and to meet specific needs of the application site and the development. Details of those measures shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the development in each phase hereby permitted and implemented in accordance with the approved details.

The National Planning Policy Framework (NPPF):

Section 8 states

*"Planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion..."*.

Section 12 states

"Planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."

*Updated Designing out Crime comments following submission of additional Secured by Design information on 1st April:*

With regard to the above application I can confirm I have met with Kier Construction and the security features for the temporary building have been discussed and agreed.

I can confirm that this is fully documented in a recent e-mail to you dated 1st April 2019 from Matthew Blythin (see Secured by Design Criteria above).

Due to the temporary period for this structure, as previously discussed in my letter of comment I do not feel a Secured by design condition need be attached on this phase of the school, but should be attached to the permanent buildings.

London Fire Brigade:

The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (The Order) in London.

With reference to your recent request for comments on the above application, I confirm the comments given are as follows:-

An undertaking should be given that, access for fire appliances as required by Part B5 of the current Building Regulations Approved Document and adequate water supplies for fire-fighting purposes will be provided (See GN 29).

The Commissioner strongly recommends that sprinklers are considered for new developments and major alterations to existing premises, particularly where the proposals relate to schools and care homes. Sprinkler systems installed in buildings can significantly reduce the damage caused by fire and the consequential cost to businesses and housing providers, and can reduce the risk to life. The Commissioner's opinion is that there are opportunities for developers and building owners to install sprinkler systems in order to save money, save property and protect the lives of occupier. Please note that it is our policy to regularly advise our elected Members about how many cases there have been where we have recommended sprinklers and what the outcomes of those recommendations were. These quarterly reports to our Members are public documents which are available on our website.

Further comments will be made by the LFB when the full building consultation has been approved by the building control body and submitted for formal consultation under the Building Regulations 2010.

Natural England:

Advise the Local Planning Authority to refer to their standing advice.

Environment Agency:

We have assessed the proposed development as having a low environmental risk. We therefore have no comments to make.

Greater London Authority (Stage 1):

At the time of the report being prepared the GLA had not yet released their Stage 1 report on the application, which was due by 26<sup>th</sup> March 2019. Members will be updated on the outcome of the Stage 1 consultation with the Mayor at the meeting.

**Policy Context**

Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that the determination of these applications must be made in accordance with the plan unless material considerations indicate otherwise.

In determining planning applications, the starting point is the development plan and any other material considerations that are relevant. The adopted development plan in for this proposal includes the Bromley Local Plan (2019) and the London Plan (2016). The Draft new London Plan was published by the Mayor for consultation in December 2017. The consultation period ended on Friday 2 March. The examination of the draft new plan in public opened on Tuesday 15 January 2019. The weight attached to the draft policies increases as the preparation of the new London Plan process advances.

Relevant policies and guidance in the form of the National Planning Policy Framework (NPPF), National Planning Policy Guidance (NPPG) as well as other guidance and relevant legislation, must also be taken into account.

The relevant policies are:

London Plan (2016)

- 2.18 Green Infrastructure: the multi-functional network of green and open spaces
- 3.18 Education Facilities
- 3.19 Sports Facilities
- 5.2 Minimising Carbon Dioxide Reductions
- 5.3 Sustainable Design and Construction
- 5.6 Decentralised Energy in Development Proposals
- 5.7 Renewable Energy
- 5.9 Overheating and Cooling
- 5.11 Green Roofs and Development Site Environs
- 5.13 Sustainable Drainage
- 5.14 Water Quality and Wastewater Infrastructure
- 5.15 Water use and supplies
- 6.3 Assessing Effects of Development on Transport Capacity
- 6.9 Cycling
- 6.10 Walking
- 6.13 Parking
- 7.1 Lifetime Neighbourhoods
- 7.2 An inclusive environment
- 7.3 Designing out Crime
- 7.4 Local Character
- 7.6 Architecture
- 7.17 Metropolitan Open Land
- 7.19 Biodiversity and Access to Nature
- 7.21 Trees and woodlands

Bromley Local Plan (2019)

- 27 Education
- 28 Educational Facilities
- 29 Education Site Allocations
- 30 Parking
- 31 Relieving Congestion
- 32 Road Safety
- 33 Access for All
- 34 Highway Infrastructure Provision
- 36 Ancient Monuments and Archaeology
- 37 General Design of Development
- 40 Other non-designated heritage assets
- 42 Development adjacent to a Conservation Area
- 55 Urban Open Space
- 69 Development and Nature Conservation Sites
- 70 Wildlife Features

72 Protected Species  
73 Development and Trees  
78 Green Corridors  
79 Biodiversity and Access to Nature  
113 Waste Management in new Development  
115 Reducing Flood Risk  
116 Sustainable Urban Drainage Systems  
119 Noise Pollution  
120 Air Quality  
122 Light Pollution  
123 Sustainable Design and Construction  
124 Carbon Dioxide Reduction, Decentralised Energy Networks and renewable energy  
125 Delivery and Implementation of the Local Plan

### Supplementary Planning Guidance

London Plan:

*Accessible London: Achieving an Inclusive Environment* (2014)

*Sustainable Design and Construction* (2014)

Bromley:

*SPG1 - General Design Principles*

*Planning obligations* (2010)

The revised National Planning Policy Framework (NPPF) (2018) (updated February 2019) and National Planning Practice Guidance (NPPG) must also be taken into account. The most relevant chapters of the revised NPPF include:

Chapter 2: Achieving sustainable development

Chapter 4: Decision making

Chapter 8: Promoting healthy and safe communities

Chapter 9: Promoting sustainable transport

Chapter 12: Achieving well-designed places

Chapter 14: Meeting the challenge of climate change, flooding and coastal change

Chapter 15: Conserving and enhancing the natural environment

Chapter 16: Conserving and enhancing the historic environment

### **Relevant Planning History**

#### **St Hugh's Playing Fields:**

16/03315/FULL1: Proposed erection of a 6FE Secondary Boys School comprising a part 2 storey, part 3 storey school building of 8,443m<sup>2</sup> 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 and dismissed at appeal on 11th December 2017, the main issue being the effect of the proposal on highway safety in the surrounding area.

17/02468/FULL1: Proposed erection of a 6FE Secondary Boys School comprising a part 2 storey, part 3 storey school building of 8,443m<sup>2</sup> 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) -

Refused and Allowed at Appeal on 19th December 2018.

The temporary block was originally due to accommodate pupils for 12 months from September 2018. However, due to delays with the permanent scheme and the need to provide school places from September 2018, the applicant withdrew the proposed temporary accommodation from the appeal scheme and the Inspector subsequently determined the appeal without the temporary block.

Details pursuant to the following conditions in respect of application ref.17/02468/FULL1 have been submitted to the Council and are currently under consideration:

Condition 9 - Construction Management Plan  
Condition 15 - Sight lines at the Bickley Road egress  
Condition 8 - Arboricultural Method Statement

### **1 Westmoreland Road:**

18/02804/FULL1: Temporary use of part ground floor/part first floor of existing office building as a school (class D1) for up to 180 pupils until 31 August 2019, including provision of 3 no. car parking spaces, 1 no. disabled parking space, 1 no. minibus parking space and 10 no. cycle parking spaces, a bin storage area and external play areas. Display of two free standing signs -

Permitted on 30th August 2018.

Condition 1 stated:

The use hereby permitted shall cease and the site shall be returned to its current lawful use on or before August 31st 2019.

Reason: In order to comply with terms of the application and ensure that the temporary use ceases and is removed.

17/00429/FULL1: This application for an entirely separate school run by the SHaW Academy comprised the demolition of the existing office (Class B1) and erection of a part 4/part 10 storey building (inclusive of lower and upper ground floor levels) for education use (Class D1) for up to 1260 pupils ages 11-19 years, associated cycle

and car parking, refuse and recycling provision, coach drop off zone and associated soft and hard landscaping -

Refused and dismissed at Appeal on 14th February 2019.

## **Considerations**

The main issues to be considered in respect of this application are:

- Land Use/Principle of development
- Playing fields and Sports Pitches
- Highways
- Design
- Neighbouring amenity
- Trees
- Ecology
- Heritage assets
- Other

### Land Use/Principle of development

The government attaches great weight to ensuring that a sufficient choice of school places is available to meet demand and says that local planning authorities should give great weight to the need to create, expand or alter schools.

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 to cater for lifelong learning across the spectrum from early years to further and higher education, and including specialist provision.

Of relevance to this application, the Council will achieve the above aims by:

a - assessing the need for the range of education infrastructure over the plan period and allocating sites accordingly, (see Education Site Allocations Policy 29)

b - defining land with permitted use for education purposes, including the sites of schools, colleges and purpose built day nurseries, and land allocated for such use through this plan, as 'Education Land' and safeguarding these sites for education purposes for the period of the plan. Whilst Education Land and buildings may also perform dual functions for wider community use, the redevelopment of education land for alternative uses, including other uses within the same use class, will not be permitted

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 (Policy 27, BLP).

Policy 28 of the BLP says that the Council will:

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

- a - open space and conservation policies
- b - the need for the provision locally,
- c - highway safety, and
- d - the accessibility of the site by means of transport other than the car.

The application site and wider St Hugh's Playing Fields site is allocated in the Local Plan for an additional secondary school (Bullers Wood School for Boys) (site 33).

However the site is also designated as Urban Open Space in the Bromley Local Plan, as such, policy 55 of the BLP and policy 7.18 of the London Plan would apply. Policy 55 of the BLP states that in these areas proposals for built development 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, the Council will weigh any benefits of the proposal being offered to the community, against a proposed loss of open space.

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

The proposed land use complies with clause 'a' of the policy 55 in that it is related to the allocated use of the site - it is temporary accommodation for Bullers Wood School for Boys. The Planning Inspector, in granting permission for the permanent school on this site (application 17/02468/FULL1), found there to be a demonstrable need for a secondary school in this area and the development proposal would have significant community benefits. Consequently, these benefits were found to outweigh the harm which would result from the loss of the open space.

The starting point for decision taking is the development plan and, in accordance with the NPPF, this means approving development proposals that accord with an up-to-date development plan without delay. In assessing the temporary accommodation which is the subject of this application, the Council must therefore

consider whether allowing this development would have irrevocable detrimental impacts which, taking into account adopted policy and all material considerations, including the extant permission for the permanent school, would signify that the application should be refused.

As discussed, the proposal for an educational use on this site accords with the Bromley Local Plan which was recently adopted. The temporary accommodation is required to accommodate the current pupils of Bullers Wood School for Boys, who are currently being taught at 1 Westmoreland road. The school only has permission to operate at the temporary site at 1 Westmoreland until August 2019 and there is therefore an urgent need to find alternative accommodation while construction of the permanent school is underway.

A number of local residents have questioned why the school cannot continue to operate at 1 Westmoreland Road for a further year negating the need for the temporary accommodation applied for. However, the planning statement accompanying the application states that after August 2019 "an alternative site is required to accommodate the increased cohort of pupils and staff as it is not possible to deliver additional accommodation with the associated works that would entail, whilst the school are in occupation". The applicant has subsequently expanded on this point stating that the only access to the building is from Sandford Road, which serves as the access point to the school, and there is no space for construction vehicles, storage of materials and deliveries to occur without impeding the day to day running of the school, or the construction site. They therefore consider that ongoing construction works during school occupation is impossible.

The construction timescales of the permanent accommodation have more recently been confirmed and are set out in the Construction Management Plan which was submitted to address conditions attached to permission ref. 17/02468/FULL1. The anticipated completion/handover date for the permanent accommodation is 24th December 2020. This would be after the expiry of the one year period for the temporary accommodation which the applicant is applying for, and additional accommodation for a further 180 pupils (totalling 540) would be required. The applicant acknowledges this in their planning statement and says that "the scheme as submitted here is in a form that would enable future modest expansion if so required (subject to planning) and for robustness, the submitted Transport Assessment also considers this potential scenario."

While ideally this would have been tied up into one application, allowing Officers to fully consider the impacts of a larger temporary scheme, the current application (for a 1 year period and for up to 360 pupils) must be assessed on its merits.

Furthermore, the applicant accepts that this approach poses a risk in that further planning permission may not be granted.

It is concluded that there is need for the proposed temporary accommodation at this site. Where there is a demonstrable need for additional educational buildings, policies 27 and 55 of the BLP state that sensitive design and siting will be sought to ensure that the impact on the open nature of the site and on playing fields is minimised, and that the privacy and amenities of any adjoining properties are not

unduly compromised, whilst at the same time delivering the necessary educational infrastructure.

The proposed modular building is a compact structure and is sited on an area which already has permission to be developed with hardstanding for car parking under the extant permission for the permanent school. This will help to minimise the encroachment of the development into previously undeveloped parts of the site and curtail any further loss of open space. It is also material that these proposals, taken in isolation, are temporary and will be conditioned accordingly.

In view of the permanent permission which has established the principle of a secondary school at this site with development on parts of the site to which this temporary application relates, the proposed development is therefore found to accord with the education and urban open space policies of the development plan. Unless there are other material planning considerations which substantially outweigh the need for the temporary provision, the application should be supported.

### Playing Fields and Sports Pitches

The NPPF and the London Plan recognise the important contribution that access to high quality open spaces and opportunities for sport and recreation can make to the health and well-being of communities and preclude the loss of open space, sports and recreational land, including playing fields. NPPF paragraph 97 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- b) 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
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

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. Policy 58 of the BLP also seeks suitable demonstration of existing pitch facilities and the re-provision to a higher quality if facilities are lost.

The overall site forms a playing field, as defined in legislation, and 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 permanent 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.

The temporary proposals result in a minor encroachment onto an area that has in the past been used as playing field. However, having considered the nature of the playing field and its ability to accommodate a range of pitches, it is not considered that the development would reduce the sporting capability of the site. This is because the principle of the proposed development of the permanent school has already been established and the site layout will therefore be subject to change when the permanent proposals are implemented.

At present there is no community use outside of school use on site, pending completion of the main scheme. At that time, the Air Training Corps (currently operating from the nearby girl's school) will return to the site and the new facilities will be available for public use. A Community Use Agreement is required under condition 24 of the permanent permission which should be put in place for when the permanent school opens. Therefore the temporary proposals will not impact upon any existing community use.

Sport England have made representations in respect of the application being a Statutory Consultee and are of the view that the proposal broadly meets exception E3 of Sport England's playing fields policy, in that:

The proposed development affects only land incapable of forming part of a playing pitch and does not:

- reduce the size of any playing pitch;
- result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);
- reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;
- result in the loss of other sporting provision or ancillary facilities on the site; or
- prejudice the use of any remaining areas of playing field on the site.'

This being the case, Sport England does not wish to raise an objection to this application.

### Highways

The NPPF recognises that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability objectives. All developments that generate significant amounts of movement should be supported by a Transport Assessment. Plans and decisions should take account of whether the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, safe and suitable access to the site can be achieved for all people. It should be demonstrated that improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. The NPPF clearly states in Paragraph 109 that development should only be prevented or refused on transport grounds where the residual cumulative impacts are severe.

A detailed Transport Assessment has been submitted which has assessed all impacts associated with the proposed scheme. The assessment has been based on a scenario of 540 pupils at the temporary site, representing a worst-case scenario. However, it is emphasised that the current application only seeks permission for a maximum of 360 pupils.

The scope of the assessment includes a review of the existing conditions of the site and the wider area; a review of the local highway network and road conditions in the surrounding area; junction capacity assessments and analysis of personal injury accidents data; a description of the proposed access, parking and drop-off arrangements and servicing/delivery arrangements; off-site highways works; expected trip generation; the anticipated transport and highways related impacts of the proposed school and the mitigation strategy for the development. A summary of the findings are set out earlier in the report.

The planning application for the full school of 900 pupils granted at appeal, took into account factors including access arrangements, trip generation, junction capacity and the existing pedestrian environment in the vicinity of the site. Subject to new infrastructure being implemented, along with parking management and marshalling, the risks to pedestrian and driver safety were considered by the Inspector to be at an acceptable level and the Inspector concluded that there would neither be an unacceptable impact on road or pedestrian safety as a result of the development. Furthermore, the residual cumulative impacts on the road network were not found to be severe.

In the context of this smaller scheme it is not considered necessary to repeat the in depth analysis which took place as part of the assessment of the permanent application. However, additional considerations in respect of the proposed temporary application are set out below.

### *Access*

Concerns have been raised by a significant number of local residents in respect of the proposed access arrangements. At the public consultation exhibition the applicant presented two options for the access

- Option 1 - Chislehurst Road in/Bickley Road out;
- Option 2 - Bickley Road in/out.

66% of residents who responded showed a significant preference for option 2. However, the application has adopted option 1 for the temporary scheme and many residents feel that their views have been ignored. In response, the applicant states that the proposed access is in line with the consented permanent scheme with the benefits being that it uses a route which has been deemed acceptable and safe in highways terms. It also minimises the number of trees which will be lost and allows the temporary accommodation to operate whilst the permanent scheme is constructed.

It is now proposed to construct the permanent building using the approved access on Chislehurst Road and, at the same time, use this as the main operational vehicular access serving the proposed temporary school site. Parents and staff cars will enter the site via the Chislehurst Road access and exit to Bickley Road. Construction traffic associated with the main school build will access and exit the site via Chislehurst Road. Traffic Marshals will be on duty at the site entrance and school visitor traffic, subject to Banksman control, will have right of way, with construction traffic being held back.

Construction hours and construction delivery hours for the permanent school were limited by the Inspector in granting the permanent scheme. Construction work shall only be carried out between 08:00 and 18:00 Mondays to Fridays and site deliveries are only to take place between 08:30 and 15:30 which could give rise to potential conflict between temporary school traffic and construction traffic during the afternoon pick up period. However, this was referred to in the Stage 2 Road Safety Audit and was not raised as a safety issue. A construction management plan for the permanent school has been submitted to the Council under condition 9 of the permanent scheme and is currently being considered by Highways Officers. Members will be verbally updated at the meeting.

While the views of residents on these particular matters are noted, given that the proposed access arrangements for the temporary school are identical to those of the permanent school which has permission for 900 pupils, the proposed access arrangements would not have transport effects so severe as to warrant refusal of the application. Furthermore, there will be no pedestrian access to the school from Chislehurst Road and pedestrian access will be from Bickley Road only which will limit the potential conflict between pedestrians and construction traffic associated with the construction of the permanent school.

### *Parking*

In relation to Parking for the temporary school proposal, London Plan and Bromley Local Plan (BLP) policies encourage sustainable transport modes whilst recognising the need for appropriate parking provision.

Policies 30, 31, 32, 33 and 34 of the BLP are relevant. The BLP does not prescribe a parking standard of its own for non-residential development but says that Parking for all other types of development is to be provided at levels set out in London Plan (LP) Table 6.2. However, the London Plan does not provide specific parking standards for schools.

In addition, developments must:

- a) provide designated blue badge parking as per LP Table 6.2;
- b) meet minimum cycle parking standards as per LP Table 6.3;
- c) ensure 1 in 5 spaces have provision (both active and passive) for electric vehicle charge points; and
- d) make provision for a car club, if above the minimum Transport for London (TfL) threshold.

There are 25 marked out parking spaces proposed along with a drop off / pick up area for parents which will accommodate 18 vehicles. Various assumptions are made in the Transport Assessment about the arrival and departure of parents and staff cars given the pre and after school activities. The assumptions are based on the 540 pupil scenario.

In the event that future expansion of the school to accommodate 540 pupils is required, there will be insufficient parking within the drop off / pick up area during the afternoon. In the morning drop offs tend to be quicker so there would be no over-capacity issues. The 2 closest roads, Bickley Road and Chislehurst Road are not suitable for increased on-street parking.

To try and mitigate the potential parking demand the School Travel Plan will feature a number of measures to encourage non-car travel modes. The applicant also proposes staggering the finishing times of pupils in years 7 and 8 to those in year 9 by 15 minutes. The latest finishing time would be 14:20 which complies with what the Inspector stipulated for the permanent scheme. After school activities will also be available until 15:05 for years 7 and 8 and until 15:20 for year 9.

It is anticipated that these measures would ensure that demand for the proposed pick-up and drop-off spaces would not significantly outweigh their availability, should the temporary school need to accommodate a third year's intake of pupils. In any event, if vehicles enter the site and the car park there would be capacity for them to form a queue on the internal access road.

Overall the proposed parking arrangements are acceptable. Due to the temporary nature of the development the Council are not requiring Electric Vehicle Charging spaces to be provided, however they are a condition of the permanent scheme permission.

#### *Construction traffic for temporary school*

Construction traffic associated with the temporary building (not the permanent building) will access and egress the site from the existing gate on Bickley Road with part of the gate being temporarily removed in order to accommodate vehicles. Parking for construction workers will be accommodated on site. This is considered acceptable.

#### *Highway measures associated with the main school*

Various highways infrastructure improvements were approved as part of the permanent school permission. These will be secured and implemented as part of a s278 agreement in consultation with the Council's Highways Department in due course. Measures which have been agreed as part of this include the signalised crossing on Bickley Road, alteration of the adjacent bus stop and footway / traffic calming measures on Chislehurst Road. The timing of the introduction of these is important. There will be no pedestrian access via Chislehurst Road so those measures are not critical. However, the Bickley Road works, including the crossing, need to be in place before the temporary school opens. Conditions are recommended accordingly.

### *Cycle Parking*

TfL has raised concerns over a lack of cycle parking spaces and, for compliance with the Draft London Plan, a minimum of 47 long stay and 3 short stay cycle parking spaces should be provided. The applicant consider that, as this would result in more cycle parking than was approved at the permanent school, a more appropriate level of cycle parking for the temporary school would be 36, which accords with the number of spaces being provided at the permanent school.

The applicant has therefore increased the number of cycle parking spaces to 36, all of which will be positioned along the western side of the modular building. This level of provision was accepted by the Appeal Inspector for the permanent scheme which will have a significantly larger number of students than the temporary school. Furthermore, the spaces will be easily accessible to staff and students and, overall, this is considered acceptable subject to a condition requiring details of secure cycle shelters being provided.

### *Refuse storage*

According to the Transport Assessment the refuse collection seems to differ according to the size of refuse vehicle. Smaller collection vehicles can enter the car park and back up to the bin store. Larger vehicles (10m) will have to wait on the access road and the bins will be moved to point 5 on the latest site plan. All this takes place within the site and, as such, there are no concerns with these arrangements from a road safety perspective.

Refuse conditions requiring details of the refuse/recycling enclosure and restricting times of servicing to those imposed on the permanent school, are recommended.

### *Conclusions on Highways impacts*

The number of pupils and staff associated with the temporary school for 2 years is less than the 900 who will attend the main school allowed at appeal. The trip generation and effect on the highway network will therefore be correspondingly less.

The new agreed access on Chislehurst Road and the highway works on Bickley Road associated with the main school will be installed prior to the opening of the temporary school.

The pedestrian access to the temporary school is from Bickley Road. The vehicle access is from Chislehurst Road and the egress is to Bickley Road. The school will enforce the "no pedestrian access" from Chislehurst Road and the contractor for the main school will ensure the separation of temporary school and construction traffic at the Chislehurst Road access.

To conclude, the application is considered acceptable from a highways perspective.

## Design

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.

Paragraph 124 of the NPPF (2018) states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

Paragraph 127 requires Local Planning Authorities to ensure that developments will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping and are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.

New development shall also establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

London Plan and Bromley Local Plan policies further reinforce the principles of the NPPF setting out a clear rationale for high quality design. Bromley Local Plan (BLP) policy 37 states that "*All development proposals, including extensions to existing buildings, will be expected to be of a high standard of design and layout*" and will be expected to meet all of the following criteria where they are relevant:

- a -Be imaginative and attractive to look at, of a good architectural quality and should complement the scale, proportion, form, layout and materials of adjacent buildings and areas;
- b -Positively contribute to the existing street scene and/or landscape and respect important views, heritage assets, skylines, landmarks or landscape features;
- c -Space about buildings should provide opportunities to create attractive settings with hard or soft landscaping (including enhancing biodiversity);
- d -The relationship with existing buildings should allow for adequate daylight and sunlight to penetrate in and between buildings;

e - Respect the amenity of occupiers of neighbouring buildings and those of future occupants, providing healthy environments and ensuring they are not harmed by noise and disturbance, inadequate daylight, sunlight, privacy or by overshadowing;

f -The development should address sustainable design and construction and include where appropriate on-site energy generation;

g - Suitable access should be provided for people with impaired mobility and meet the principles of inclusive design. Where necessary and relevant to the development, contributions may be sought to improve accessibility around the development;

h -Security and crime prevention measures should be included in the design and layout of building and public areas;

i - Recycling and waste storage facilities are incorporated within the design layout;

j -Respect non designated heritage assets. Applications should be accompanied by a written statement setting out design principles and illustrative material showing the relationship of the development to the wider context.

The proposed layout places the temporary school building to the south of the location of the approved permanent school, on an area which is earmarked as car parking for the permanent school. Vehicle access to the site and vehicle circulation is the same as in the approved scheme with car parking similarly positioned in the southwest corner of the site. The proposed layout retains the woodland, trees, scrub and vegetation which were shown as being retained in the permanent school plans. The existing playing fields and sports pitches have also been retained.

The proposed modular building is a compact structure with three storeys of teaching facilities', measuring 9.6m in height with a flat roof. The proposed siting on an area which already has permission to be developed with hardstanding for car parking under the permanent proposals, will help to minimise the encroachment of the development into previously undeveloped parts of the site and reduce the impact on the open nature of the site.

The temporary building would be positioned well away from site boundaries and around 40m from the nearest residential properties to the south in Bickley Road. At 9.6m high, the temporary building would be less visible in longer range views than the 12.5m high permanent school building and it would be largely screened in views from the adjacent streets by existing mature trees and boundary vegetation.

The most noticeable change to the street scene as a result of the development would be the proposed vehicular access from Chislehurst Road which will require the removal of some of the mature trees and vegetation which would open up views into the site somewhat from 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. This was deemed as acceptable by the Planning Inspector in granting the application for the permanent school.

Tree and shrub planting is sparser/less dense along the western site boundary adjoining the car dealership and the proposed modular building would be highly visible from this adjacent site. However, the siting of the building, some 50m away from the boundary with this site and the retained row of trees lining the internal access drive would all help to reduce its visual impact and it would not appear unduly prominent from the car dealership or detrimental to the amenities of this neighbouring site.

Externally, the modular building will be finished with Light Grey coloured cladding panels and internally plasterboard will be finished with a vinyl layer to provide a 1 hour fire rating. The flat roof of the building is a timber joist and panel construction which is coloured black externally, insulated internally and with a fire Retardant membrane. Fascias are dark grey plastic coated galvanized steel trims. Windows are white uPVC frames with top-hung openings and trickle vents providing background ventilation and external doors are grey in colour. Timber cladding on the ground floor around the entrance level highlights this as the main entrance to the building.

The building's form, repetitive pattern of fenestration and its external facing materials appear utilitarian and the building would neither complement nor enhance its surroundings. However, given the limited period for which it will be required, the form and appearance of the building are, on balance, acceptable for its proposed temporary period and, as set out above, would be largely screened from the surrounding public realm. A time-limiting condition is necessary to ensure that the building is removed promptly from the site at the end of the 1 year period.

In terms of the internal teaching environment which the building would provide, the applicant has submitted a noise report which confirms that the building will be able to be suitably ventilated by openable windows while at the same time maintaining acceptable levels of noise internally. Compliance with roof rain noise criteria is also expected. Noise conditions relating to the provision of new mechanical plant are recommended.

A single point of access to the building is proposed on the west side. Central corridors over all floors leading to teaching spaces are proposed and level access is provided throughout with a platform lift at the western end of the building providing disabled access between the three floors. Two internal staircases are also proposed. Externally, a ramp provides access to the main entrance and level access is available from the fire escape on the eastern side of the building.

Condition 7 of the planning permission for the permanent school requires a hard and soft landscaping scheme to be submitted to and approved by the Local Planning Authority. The landscape masterplans supplied in support of the temporary school are sufficient on the basis of the temporary nature of this development. A full assessment of landscaping, including the treatment of the

wider site, is reserved for consideration under condition 7 of permission ref.17/02468/FULL1. Additional tree impacts are considered later in this report.

New bicycle storage facilities are also proposed adjacent to the western side of the building, details of the appearance of which would need to be agreed by way of a condition attached to any subsequent planning approval.

In conclusion, the proposal would result in an acceptable form of accommodation for staff and students of the school for the duration of construction of the permanent school. Furthermore, the proposed siting of the modular building and layout of associated access roads and car parking areas would only affect parts of the site which have already had permission to be developed under the permanent proposals. In view of the temporary nature of the proposal, overall the design of the development is considered acceptable.

#### Impact on neighbouring amenity

In determining any application, a key consideration would be the impact of the development on the amenities of neighbouring properties. BLP policy 37 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.

A significant number of objections to the application have been raised by local residents. The majority of concerns are in relation to the intensification of the use of this site, the proposed access arrangements and the resulting impacts on traffic, congestion and road safety in the area. Concern is raised specifically in relation to the new vehicular access from Chislehurst Road with many residents preferring the entry and exit to the temporary school to be on Bickley Road.

It is a material consideration that these access arrangements were approved by the Inspector for the permanent school for 900 pupils. The temporary school will only accommodate 360 pupils and would therefore have a less intensive impact on the highway than the permanent scheme.

It is also noted that servicing and delivery vehicles will also access the temporary school site from Chislehurst Road but will egress onto Bickley Road whereas in the permanent school they will enter and exit from Chislehurst Road. These temporary arrangements will help to reduce noise and disturbance at residential properties on Chislehurst Road from associated vehicle movements. On balance the impact of the new access on Chislehurst Road on residential amenities would not be so severe as to warrant the refusal of planning permission.

Residents have also highlighted safety concerns in connection with the construction of the permanent school being carried out in tandem with the operation of the temporary school. Highways matters have been discussed earlier in this report.

While impact on neighbouring amenities as a direct result of the construction of a development would not, in itself, warrant a planning application being refused, the applicant has submitted a Construction Management Plan which details mitigation measures which will be implemented to deal with increased vehicle emissions, waste associated with the proposed scheme and construction noise. Demolition and construction hours are dealt with and are enforceable under separate legislation (section 60 and 61 of the Control of Pollution Act 1974). Nevertheless, the Appeal Inspector considered it appropriate to condition the hours of construction and the timing of construction-related deliveries for the permanent school and these should therefore be repeated in this instance.

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 proposed social area/playground/games court is in a similar location to a new games court area approved under the permanent scheme and, given the separation to neighbouring sites and the fewer numbers of children using the site compared to the permanent school, the impact on neighbours would not be significant. Furthermore, no community use of the temporary school is proposed; this will commence on completion of the permanent school.

External noise levels of proposed mechanical plant have been specified within the acoustic assessment to ensure that it does not result in significant adverse impacts on nearby sensitive receptors and it is anticipated that a further assessment will be required once plant details and mitigation measures are known and further attenuation measures to protect residents from mechanical plant noise. Noise conditions are recommended.

Floodlighting for the temporary site is proposed in the car park and in the hard social area to the eastern side of the building. The floodlighting will be positioned a significant distance from the site boundaries with adjacent residential dwellings: around 45m to the south, over 100m to the east and around 80m to the north and will be mounted on 3m high columns with light being directed away from neighbouring sites. Given the existing mature trees and boundary vegetation around most of the site, along with the mitigation measures proposed, the proposed lighting for the development would not significantly impede on the amenities currently enjoyed by occupiers of nearby residential dwellings.

Furthermore, the lighting proposed around the internal access roads and car parking area accords with that which was approved for the school's permanent accommodation. Conditions are recommended to ensure that the lighting scheme is carried out in accordance with the details set out in the report.

The Council's Environmental Health Officer also raised no concerns to the proposal subject to conditions.

The visual impact of the development has been considered above in the Design section of this report. To summarise, the scale and height of the proposed building, its siting in relation to site boundaries, distance to neighbouring sites along with the additional benefit of the vegetation screening around most of the

site, means that the development would not have an unduly prominent or harmful visual impact for occupiers of nearby residential sites. Furthermore, the potential for overlooking from the new development and/or a loss of privacy for neighbouring residents is negligible.

In response to other matters raised by local residents:

- the acceptability in principle of the temporary school accommodation at this site, including need and the impact on playing fields and open space has been discussed earlier in the report;
- The likelihood of the temporary school needing to house a third year group, i.e. 540 students, is also discussed above and in that event the applicant would need to submit further planning application(s);
- With regards to the proposed start and finish times of the school these would accord with those approved for the permanent school and can be conditioned accordingly.

Overall, whilst the proposal will clearly intensify the use of the site and the local highways network, and this would noticeably alter the character of the area and the surrounding 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

All of the trees on the site are the subject of The Buller's Wood playing Field Tree Preservation Order (TPO). The site is not within a conservation Area.

Policy 73 of the BLP requires proposals for new development to take particular account of existing trees on the site and on adjoining land, which in the interests of visual amenity and/or wildlife habitat, are considered desirable to be retained. Tree preservation orders will be used to protect trees of environmental importance and visual amenity. When trees have to be felled, the Council will seek suitable replanting.

Policy 74 says that the Council will seek to improve the amenity and conservation value of trees and woodlands and will:

- Encourage appropriate beneficial management;
- Encourage appropriate new tree planting in suitable locations; and
- Promote public interest in and enjoyment of trees and woodlands.

The application was accompanied by an arboricultural impact assessment (AIA), a method statement and a tree protection plan.

Similar to the approved permanent scheme (ref.17/02478/FULL1, the proposals will see the removal of a number of C category trees that are insignificant and a small number of B category trees. Since the approval for the permanent school,

the applicant has varied some of the proposed tree works - the northern grouping of trees labelled G6 will now be managed to provide essential visibility splays for the access. Clearance pruning of tree grouping G12 to facilitate the location of the building is also proposed. To mitigate, tree planting is possible between the boundary and sports pitch to form a denser buffer zone, thereby minimising the visual impact from the public realm. On balance, the impact this would have on boundary screening to the site would be acceptable.

Buffering boundary treatments should therefore form a focus for replacement tree planting. A planting plan and schedule would be required to confirm species selection and ensure planting is included to a satisfactory degree and standard. All of this can be secured as part of the details to be submitted under condition 7 (landscaping) of the permanent school, which is currently outstanding.

Tree constraints and protection measures have also been considered as part of the AIA, which demonstrates precautionary methods being afforded to all retained trees, including those of significance.

Tree conditions are recommended.

### Ecology

London plan policy 7.19(C) states that Development Proposals should:

- a) wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity
- b) prioritise assisting in achieving targets in biodiversity action plans (BAPs), set out in Table 7.3, and/or improving access to nature in areas deficient in accessible wildlife sites
- c) not adversely affect the integrity of European sites and be resisted where they have significant adverse impact on European or nationally designated sites or on the population or conservation status of a protected species or a priority species or habitat identified in a UK, London or appropriate regional BAP or borough BAP.

Policy 72 of the BLP states that Planning permission will not be granted for development or change of use of land that will have an adverse effect on protected species, unless mitigating measures can be secured to facilitate survival, reduce disturbance or provide alternative habitats.

The Ecology report accompanying the application finds that the application site is of low ecological importance and no additional survey, assessment, or mitigation beyond the precautionary measures is required. Tree and habitat protection and measures are proposed and it is also noted that no trees suitable for roosting bats will be removed or significantly pruned to facilitate development.

The report also recommends that external lighting should be minimised across the entire site, especially near trees south and west of the construction footprint, which

are suitable for roosting bats. The applicant has submitted a lighting assessment which proposes lighting for the access road, parking area and to the pathways around the temporary building which will be mounted on the building itself. While the ecology report recommends that lighting near to the trees to the south and west is avoided, the lighting scheme accords with that which was approved for the school's permanent accommodation and no significant additional lighting along the southern or western edges of the development site is proposed. Provided that the lighting scheme is carried out in accordance with the details set out in the report, including the use of timers to ensure no lighting is left on overnight, the impact on ecology is acceptable.

Ecology and lighting conditions are recommended.

### Heritage Assets

#### *Conservation Area*

The site lies adjacent to Bickley Park Conservation Area. Therefore BLP policy 42 and para 190 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 and from public vantage points would not be affected. 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. 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 BLP policy 42.

#### *Archaeology*

BLP policy 46 states that when considering planning applications for development involving excavation or other ground works the Council will require that:

- Within the defined Areas of Archaeological Significance, a written statement of the likely impact is submitted in the form of an archaeological assessment (which can be desk based); where necessary information cannot be obtained by other means, an archaeological field evaluation should be carried out prior to determination;

- At sites of potential archaeological importance (as defined below), where permanent preservation in situ is not justified, provision shall be made for an appropriate level of investigation and recording to be undertaken by a recognised archaeological organisation before any development commences.

Where investigations indicate that in situ preservation is inappropriate, excavation and recovery should be carried out by a reputable archaeological body, before development commences. Any such investigations shall be in accordance with a detailed scheme to be approved in advance by the Council and the results shall be subsequently published.

An Archaeological Desk Based Assessment and Evaluation Report have been submitted with the application. A further report was submitted on 26th March 2019 which addressed the archaeological potential of the wider site.

The proposal is acceptable from an archaeology perspective. No further archaeological assessment or conditions are necessary.

### Other Considerations

#### *Energy and Sustainability*

The NPPF requires Local Planning Authorities to adopt proactive strategies to mitigate and adapt to climate change. London Plan and Draft Local Plan Policies advocate the need for sustainable development. All new development should address climate change and reduce carbon emissions.

Policy 5.2 Minimising Carbon Dioxide Emissions of the London Plan states that development should make the fullest contribution to minimising carbon dioxide emissions in accordance with the hierarchy; Be Lean: use less energy; Be clean: supply energy efficiently and Be green: use renewable energy. Major development proposals should include a detailed energy assessment to demonstrate the measures that will assist the whole development to reduce the regulated CO2 emissions by a minimum 35% beyond BR Part L2A 2013.

Policy 5.3 Sustainable Design and Construction of the London Plan states that the highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime.

The applicant has submitted a Building Regulations compliance report and an Energy Assessment was submitted on 15<sup>th</sup> April and is currently being reviewed by Officers. Members will be updated verbally at the meeting as to the acceptability of the Energy Assessment and any necessary conditions or obligations pertaining to it.

## *Drainage*

The site lies within Flood Zone 1 and therefore is at low risk from fluvial and tidal flooding.

Policy 5.13 of the London Plan and BLP policy 116 require developments to utilise sustainable urban drainage systems (SuDS), unless there are practical reasons for not doing so, and ensure that surface water is managed as close to its source as possible in line with the hierarchy in policy 5.13. New development such as this should aim to utilise a variety of SuDS methods, such as soakaways (subject to soil conditions), filter drains, permeable surfaces/permeable sub-bases, green roof technology, grey water re-cycling, attenuation, etc.

The applicant has submitted a drainage strategy which is acceptable and a condition is recommended to ensure it is implemented in accordance with the details submitted.

## *Pollution and Contamination*

This site is not within an Air Quality Management Area. Notwithstanding this, BLP policy 120 requires developments which are likely to have an impact on air quality or which are located in an area which will expose future occupiers to pollutant concentrations above air quality objective levels to submit an Air Quality Assessment. Developments should aim to meet "air quality neutral" benchmarks in the GLA's Air Quality Neutral report.

The applicant has submitted an Air Quality Assessment which concludes that the development will have a negligible impact on air quality therefore no mitigation is required. However, the measures set out in the School Travel plan, including the provision of cycle parking at the site, will help to encourage sustainable travel to the site. Furthermore, measures to minimise the impact of the construction phase on local air quality have been set out within the Construction Management Plan.

The application has provided a contamination report which finds there to be a low to moderate risk of contamination below the site and a moderate risk that a significant source of contamination exists off site. The report makes recommendations with respect to the carrying out of the building works and the safety of construction workers. The Council's Environmental Health Officer raises no concerns to the proposal.

Conditions are recommended to secure the implementation of the Travel Plan and to ensure that the CMP is implemented in accordance with the details provided.

## **Summary and Conclusions**

The application has been assessed against the adopted development plan and all other material considerations.

In view of the permanent permission which has established the principle of a secondary school at this site and with development already on parts of the site to

which this temporary application relates, the proposed development is found to accord with the education and Urban Open Space policies of the development plan.

Furthermore, the development would not prejudice any playing fields or sporting capability of the site.

While there will clearly be a highways impact as a result of the intensification of the use of the site compared to existing, in view of the permanent school being granted permission at the site, this smaller, 360 pupil, scheme does not give rise to any significant highways concerns. While the concerns of local residents have been duly taken into account, in this instance, the transport impacts of the development are not so severe to warrant its refusal on highway grounds.

The impacts on trees, ecology and air quality from the development as well as the potential for contamination and flood risk to be increased as a result of the development have also been considered. The proposal is unlikely to have any significantly adverse impacts subject to the recommendations made in the accompanying reports being adhered to. In addition, the impact of the development on heritage assets has been identified as low risk.

Consequently, there are no material planning considerations substantially outweighing the need for the temporary provision while the extant permanent school is being constructed, or which signify that the application should be refused. The application is recommended for permission, subject to conditions.

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

**RECOMMENDATION: PERMISSION Subject to any direction by the Mayor of London**

**Subject to the following conditions:**

- 1 The building(s) hereby permitted shall be removed and the use discontinued and the land reinstated to its former condition on or before the 1st September 2020.**

**Reason: In order that the situation can be reconsidered in the light of the circumstances at that time in the interest of the amenities of the area in accordance with Policy 37 of the Bromley Local Plan.**

- 2 The development hereby permitted shall not be carried out otherwise than in complete accordance with the plans and documents listed in this condition unless previously agreed in writing by the Local Planning Authority: 08291-A-L-(00)-0201 REV P1; 4853-LLB-ZZ-ZZ-DR-L-0001-P05; 4853-LLB-ZZ-ZZ-DR-L-0002 P03; 4853-LLB-EA-E1-DR-L-0001-S4-P04; 4853-LLB-EB-E1-DR-L-0001 P03; 4853-LLB-XX-XX-DR-Ab-0008 P01; 4853-LLB-XX-XX-DR-Ab-0009 P01; L160207-131 REV A; L160207-132 REV A; L160207-133 REV A; L160207-331 REV A**

**Reason: To prevent any unacceptable deviation from the approved plans.**

- 3** The use shall not commence until the internal access road, turning areas and parking areas have been laid out as shown on drawing no: 4853-LLB-ZZ-ZZ-DR-L-0001 P05. All parking spaces shall be retained for the duration of this planning permission.

**Reason:** In order to comply with Policies 30, 31, 32 and 33 of the Bromley Local Plan and to avoid development without adequate access or parking provision, which is likely to lead to parking inconvenient to other road users, would be detrimental to amenities and prejudicial to road safety.

- 4** The use hereby permitted shall not be commenced until space has been laid out within the site for the parking of bicycles in accordance with a scheme that has first been submitted to and approved in writing by the local planning authority. The bicycle parking facility shall be retained for the duration of this planning permission.

**Reason:** In order to comply with Policy 6.9 of the London Plan and in order to provide adequate bicycle parking facilities at the site in the interest of reducing reliance on private car transport.

- 5** (a) Details of arrangements for storage of refuse and recyclable materials (including means of enclosure for the area concerned where necessary) shall be submitted to and approved in writing by the Local Planning Authority prior to occupation of the development.  
(b) The arrangements as approved under part (a) shall be completed before any part of the development hereby permitted is first occupied, and permanently retained thereafter.

**Reason:** In order to comply with Policy 37 of the Bromley Local Plan and in order to provide adequate refuse storage facilities in a location which is acceptable from a residential and visual amenity aspect.

- 6** Before any part of the development hereby permitted is first occupied, details of the height and type of fencing and enclosures in excess of that considered to be 'permitted development' shall be submitted to and approved in writing by the Local Planning Authority. Once approved the scheme shall be implemented in full and permanently maintained thereafter.

**Reason:** In order to comply with Policy 37 of the Bromley Local Plan and in the interest of the visual amenities of the area.

- 7** The new agreed access on Chislehurst Road and the highway works on Bickley Road associated with the main school will be installed prior to the opening of the temporary school.

**Reason:** In the interests of pedestrian and vehicular safety and the amenities of the area and to comply with Policies 30, 31, 32 and 34 of the Bromley Local Plan.

- 8** Construction of the development shall be carried out in complete accordance with the Updated Construction Management, Delivery and Servicing Plan (Kier Construction Southern January 2019 V1) received 1st April 2019. The approved Construction Management, Delivery and

**Servicing Plan shall be adhered to throughout the construction period for the development hereby permitted.**

**Reason: In the interests of pedestrian and vehicular safety and the amenities of the area and to comply with Policies 30, 31, 32 and 119 of the Bromley Local Plan and in the interest of the amenities of the adjacent properties.**

- 9 Construction works shall only be carried out between the hours of 0800 and 1800 Mondays to Fridays, 0800 to 1300 Saturdays and not at all on Sundays and Public Holidays.**

**Reason: In the interests of pedestrian and vehicular safety and the amenities of the area and to comply with Policies 30, 31, 32 and 119 of the Bromley Local Plan and in the interest of the amenities of the adjacent properties.**

- 10 Construction related deliveries shall only be carried out between the hours of 0830 and 1530 Mondays to Fridays, 0800 to 1300 Saturdays and not at all on Sundays and Public Holidays.**

**Reason: In the interests of pedestrian and vehicular safety and the amenities of the area and to comply with Policies 30, 31, 32 and 119 of the Bromley Local Plan and in the interest of the amenities of the adjacent properties.**

- 11 While the development hereby permitted is being carried out a suitable hardstanding shall be provided with wash-down facilities for cleaning the wheels of vehicles and any accidental accumulation of mud of the highway caused by such vehicles shall be removed without delay and in no circumstances be left behind at the end of the working day.**

**Reason: In the interest of pedestrian and vehicular safety and in order to comply with Policy 32 Bromley Local Plan.**

- 12 The development shall be implemented in accordance with the details set out in the Arboricultural Method Statement (4853-LLB-MS-AB-0001-S0-P02) dated 10th April 2019, approved as part of the planning application, under the supervision of a retained arboricultural specialist in order to ensure that the correct materials and techniques are employed.**

**Reason: To ensure that works are carried out according to good arboricultural practice and in the interests of the health and amenity of the trees to be retained around the perimeter of the site and to comply with Policies 73 and 73 of the Bromley Local Plan.**

- 13 The development hereby permitted shall only be used as a secondary school and for no other purpose (including any other purpose in Class D1 of the Schedule of the Town and Country Planning (Use Classes) Order 1987 or in any other provision equivalent to that class in any statutory instrument revoking an re-enacting that Order with or without modification). There shall be no change of use whether allowed by the Town and Country Planning (General Permitted Development) (England) Order 2015 or any Order amending, revoking and re-enacting this Order.**

**Reason: In order to safeguard the site for educational purposes and in the interests of protecting the character of the area and residential amenity of neighbouring properties in accordance with Policies 27 and 37 of the Bromley Local Plan.**

- 14 The school hereby permitted shall only be used for a maximum of 360 pupils between the ages of 11 and 16 years.**

**Reason: In order to comply with policies 30, 31, 32 and 37 of the Bromley Local Plan and in the interests of pedestrian and vehicular safety and the amenities of the area.**

- 15 Excluding the Breakfast Club, after school clubs and school extra-curricular activities, the school day shall start no later than 07:45 and finish no later than 14:20.**

**Reason: In order to comply with policies 30, 31, 32 and 37 of the Bromley Local Plan and in the interests of pedestrian and vehicular safety and the amenities of the area.**

- 16 Servicing vehicles and delivery vehicles and coaches shall not visit the site between the hours of 0645-0745 and 1415-1515 Mondays to Fridays and not at all at weekends or on Public Holidays.**

**Reason: In order to comply with policies 30, 31, 32 and 37 of the Bromley Local Plan and in the interests of pedestrian and vehicular safety and the amenities of the area.**

- 17 The development and use of the site shall be implemented and carried out in complete accordance with the measures in the School Travel Plan V2 (Ref. 4662/008/003). The Travel Plan shall be monitored and updated and new travel surveys undertaken within the first three months of occupation, in accordance with the recommendations in the Travel Plan. These shall be carried out according to the Transport for London STARS system and in consultation with the Council.**

**Reason: In order to ensure appropriate management of transport implications of the development and to accord with Policy 31, 32, 33 and 34 of the Bromley Local Plan.**

- 18 (a) External lighting for the development shall be implemented in complete accordance with the External Lighting Statement (Crofton Consulting Engineers November 2018) and drawing E-9810 P1 before the development hereby permitted is first occupied.**

**(b) No further lighting, including during the construction phase, shall be installed on the site without the prior approval in writing by the Local Planning Authority and shall be implemented in accordance with the approved details and shall be permanently maintained in an efficient working manner.**

**(c) any additional lighting approved under part (b) should only be installed if there is a significant need and should be avoided near treelines and/or hedgerows. If required, additional lighting should be 'bat-sensitive', with light angled towards the ground, light spill should be minimised through**

the use of hoods, shields and/or cowls and the lighting design should follow the principles of the Bat Conservation Trust's Guidance Note 08/18: Bats and artificial lighting in the UK: Bats and the Built Environment series (BCT & ILP, 2018).

Reason: In the interest of amenity and public safety and to ensure the protection of the ecological value of the site and its surroundings, in accordance with Policies 37, 72, 78 and 79 of the Bromley Local Plan.

- 19 The development hereby permitted shall be carried out in complete accordance with the recommendations in the following reports: Ecological Impact Assessment ref.4853-LLB-RP-EC-0004-S4-P01, Bat Report ref.4853-LLB-RP-EC-0001-S3-P01 and Reptile Report ref.3817-LLB-RP-EC-0001-S4-P01. Any deviation from these recommendations shall be submitted to and approved in writing by the Local Planning Authority prior to works commencing.

Reason: To ensure the protection of the ecological value of the site and its surroundings, in accordance with Policies 72, 78 and 79 of the Bromley Local Plan.

- 20 The surface water drainage scheme hereby permitted shall be implemented in full accordance with the details as set out in the "Temporary Classrooms External Works & Drainage" Plan DRW No. 08473-EAL-00-XX-M2-C-0007 Rev D dated 07/07/2017 unless otherwise agreed in writing by the Local Planning Authority.

Reason: In order to comply with Policy 115 and 116 of the Bromley Local Plan and Policy 5.13 of the London Plan and to reduce the impact of flooding both to and from the proposed development and third parties.

- 21 No retained tree shall be cut down, uprooted, destroyed, pruned, cut or damaged in any manner during the development phase and thereafter within 5 years from the date of occupation of the building for its permitted use, other than in accordance with the approved plans and particulars or as may be permitted by prior approval in writing from the local planning authority.

Reason: Required to safeguard and enhance the character and amenity of the area, to provide ecological, environmental and bio-diversity benefits and to maximise the quality and usability of open spaces within the development, and to enhance its setting within the immediate locality in accordance with Policies 37, 73 and 74 of the Bromley Local Plan

- 22 (a) At any time the combined plant noise rating level shall not exceed the measured typical background L90 level at any noise sensitive location. For the purposes of this condition the rating and background levels shall be calculated fully in accordance with the methodology BS4142:2014.

(b) At any time the measured or calculated absolute plant noise level shall not exceed 10dB below the typical background noise level (LA90 15 minute) in this location. All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels.

**(c) Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.**

**(d) Following installation, but before the new plant comes into operation, measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.**

**Reason: In order to comply with Policies 119 and 37 of the Bromley Local Plan and in the interests of the amenities of occupiers of the building and those of adjacent sites.**

- 23 The development hereby permitted shall incorporate the Secure by Design measures detailed in the Secure by Design Criteria (taking into account ecology constraints) to minimise the risk of crime and meet the specific needs of the site and the development.**

**Reason: In the interest of security and crime prevention and to accord with Policies 4 and 37 of the Bromley Local Plan.**

**You are further informed that :**

- 1 If 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.**
- 2 Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.  
<https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewaterservices>.**
- 3 Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.**
- 4 An undertaking should be given that, access for fire appliances as required by Part B5 of the current Building Regulations Approved Document and adequate water supplies for fire fighting purposes, will be provided (See GN 29).**
- 5 The Commissioner strongly recommends that sprinklers are considered for new developments and major alterations to existing premises, particularly where the proposals relate to schools and care homes. Sprinkler systems installed in buildings can significantly reduce the damage caused by fire and the consequential cost to businesses and housing providers, and can reduce the risk to life. The commissioner's opinion is that there are opportunities for developers and building owners**

**to install sprinkler systems in order to save money, save property and protect the lives of occupier.**

- 6 For any Abnormal Loads, TfL should be consulted by the developer/contractor to agree the proposed routing.**
- 7 It appears that on exiting the site, larger vehicles would encroach the opposite side of the carriageway. Therefore it is recommended that trained banksmen are present to assist with the safe manoeuvre of vehicles.**
- 8 Construction deliveries should be timed outside of the network peak hours.**