

**Section '3' - Applications recommended for PERMISSION, APPROVAL or CONSENT**

**Application No :** 19/00373/FULL1

**Ward:**  
**Chelsfield And Pratts  
Bottom**

**Address :** Warren Road Primary School,  
Warren Road, Orpington BR6 6JF

**Objections: Yes**

**OS Grid Ref: E: 545712 N: 164469**

**Applicant :** Warren Road Primary School

**Description of Development:**

Detached modular classroom building

Key designations:

Biggin Hill Safeguarding Area  
London City Airport Safeguarding  
Smoke Control SCA 28  
Urban Open Space

**Proposal**

Permission is sought for the erection of a detached flat-roofed modular building measuring 15.5m in width, 10m in depth and 3.6m in height to be used for the training of educational staff which is currently carried out within the main school buildings. The school was appointed a teaching school in 2012 and a Talk for Writing training centre in 2018 which promotes a literacy programme, and it currently runs classes, forums and training programmes for local education staff and newly qualified teachers. During the school day, these sessions currently take place within the two school halls which are therefore unable to be used by the school children. The new building would therefore provide a purpose built training centre for the existing teaching school at the site.

The building would be located on the school field close to the Warren Road entrance, and would back onto the rear gardens of residential properties in Warren Road. It would contain a large classroom/meeting space, a kitchen, a reception and WCs.

The application was supported by the following documents:

- Planning, Design and Access Statement
- Statement from the Head Teacher
- Responses dated 13th May 2019 and 19th June 2019 to Sport England's comments.

## **Location and Key Constraints**

This school site is located to the rear of residential properties in Cloonmore Avenue to the north, Warren Road to the south, and Gleeson Drive to the west, and its main vehicular and pedestrian access is from Warren Road between Nos.23 and 25. The site is designated as an area of Urban Open Space within the Bromley Local Plan.

## **Comments from Local Residents and Groups**

Nearby owners/occupiers were notified of the application and representations were received, which can be summarised as follows:

### **Objections**

- Proposals would add to traffic congestion in Warren Road
- Possible drainage problems and flood risk
- The nature garden would be affected
- Loss of outdoor space for pupils
- The proposals would not benefit children at the school or provide extra school places
- Building is too close to the sports pitch
- Proposed building is out of keeping with the area
- Building is for a training centre and is unrelated to school activities
- Poor design of the building
- Building should be located closer to the school
- Additional on-site parking should be provided for the training centre
- Loss of outlook from neighbouring properties
- Detrimental impact on the open nature of the site
- The building permitted in 2013 (but not built) is not comparable as it was for primary school classrooms not an adult training facility and was situated further away from residential properties at the foot of a slope.

Please note the above is a summary of objections received and full text is available on the Council's website.

The application was called into committee by a Ward Councillor.

## **Comments from Consultees**

Sport England: Objections are raised as the proposals would adversely impact on the School's main area of playing field whilst there are other locations within the site where the building could be placed in order to reduce its impact.

Highways: The application indicates that the classroom would be used for a range of classes, forums and training programmes for local education staff and newly qualified teachers. These apparently already take place on the site but take up space that could be used for children. Given that there would be no increase in the

number of people on the site, and therefore no increase in trips or parking demand, no highways objections are raised to the proposals.

## **Policy Context**

Section 70(2) of the Town and Country Planning Act 1990 (as amended) sets out that in considering and determining applications for planning permission the local planning authority must have regard to:

- (a) the provisions of the development plan, so far as material to the application,
- (b) any local finance considerations, so far as material to the application, and
- (c) any other material considerations.

Section 38 (6) of the Planning and Compulsory Purchase Act (2004) makes it clear that any determination under the planning acts must be made in accordance with the development plan unless material considerations indicate otherwise.

The National Planning Policy Framework was published on 24 July 2018 and updated on 19 February 2019.

The development plan for Bromley comprises the Bromley Local Plan (Jan 2019) and the London Plan (March 2016). The NPPF does not change the legal status of the development plan.

### London Plan Policies

- 3.18 Education Facilities
- 3.19 Sports Facilities

### Bromley Local Plan

- 28 Educational Facilities
- 30 Parking
- 32 Road Safety
- 37 General Design of Development
- 55 Urban Open Space
- 119 Noise Pollution

### Supplementary Planning Guidance

NPPF

## **Planning History**

The relevant planning history relating to the application site is summarised as follows:

The school was extended in the 1980s and 90s under refs.85/02012, 85/02538, 97/01531 and 99/01231.

Permission was granted in 2014 (ref.13/04165) for a detached timber framed classroom building located within the northern part of the site adjacent to the car park off Cloonmore Avenue which was to provide additional accommodation for the existing school. The permission was not implemented and has now lapsed.

## **Considerations**

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

- Principle
- Impact on playing fields
- Design
- Highways
- Neighbouring amenity
- Sustainability
- CIL

### Principle

Policy 28 of the BLP supports proposals for new educational facilities which meet local need and maximise the use of existing Education Land.

The site is designated as Urban Open Space, and Policy 55 of the BLP permits proposals for built development in Urban Open Space only where:

- a - The development is related to the existing or allocated 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.

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

The proposed use of the building for educational training purposes is related to the educational use of the site, and the proposals are to accommodate an existing training facility at the site which currently occupies existing school buildings. Subject to the imposition of conditions restricting the numbers of delegates attending the training school and the days and hours of use of the building for such purposes, the proposals are not considered to result in an intensification of the use of the site.

### Impact on playing fields

Sport England has raised concerns about the location of the proposed building and its impact on an area of usable playing field which is contrary to their Playing Fields

Policy. They consider that there are other locations within the site where the building could be located so that it would not impact on the playing fields.

In response, the applicant considered alternative sites for the building (eg. closer to the main school building, on the northern car park from Cloonmore Avenue, the location of the previously permitted classroom building), but concluded that the currently proposed location of the building was the most appropriate position to accommodate the proposed use, whilst protecting the schools playing fields and sports pitches. (The sequential assessment is available to view in full on the file). The applicant confirms that the minimum distance between the building and the sports pitch is 10m which they contend provides more than adequate run-off space.

### 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 of the NPPF (2018) 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 (such as increased densities). 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 BLP policies further reinforce the principles of the NPPF setting out a clear rationale for high quality design.

The proposed building is located close to the main school buildings and adjacent to the southern boundary in order to limit its impact on the open nature of this part of the school site. The location has also been chosen in order to ensure a closer relationship with the main entrance from Warren Road for security purposes. The

building would be single storey only, and would have a flat roof which would reduce the overall bulk of the building.

It is considered that the building has been sensitively designed and located so as not to cause significant harm to the open nature of the school site, and would therefore comply with Policy 55 of the BLP.

### Highways

The NPPF recognises that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. The NPPF clearly states that transport issues should be considered from the earliest stage of both plan making and when formulating development proposals and development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

The NPPF states that all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed

London Plan and BLP Policies encourage sustainable transport modes whilst recognising the need for appropriate parking provision. Car parking standards within the London Plan and Bromley Local Plan should be used as a basis for assessment.

No highways objections are raised to the proposals given that there would be no increase in the number of people attending the site, and therefore no increase in trips or parking demand.

### Neighbouring amenity

Policy 37 of the BLP seeks to protect existing residential occupiers from inappropriate development. Issues to consider are the impact of a development proposal upon neighbouring properties by way of overshadowing, loss of light, overbearing impact, overlooking, loss of privacy and general noise and disturbance.

The proposed building would be located adjacent to the rear boundaries of Nos.39-43 Warren Road, but these properties have 23-25m long rear gardens, and given that the building would be single storey only with a flat roof measuring up to 3.6m in height, the proposals are not considered to cause significant harm to outlook or privacy to these properties, nor result in undue loss of light to the rear gardens.

### 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 5.3 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.

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.

### CIL

The Mayor of London's CIL is a material consideration. CIL is not payable on this application.

### **Conclusion**

The proposals are considered to be acceptable as they would be related to the existing educational use of the land, and would not result in an intensification of use; the building would cover only a small percentage of the open playing fields and would be sited close to the boundary and the existing school buildings to limit its impact on the Urban Open Space; and there would be no adverse impact on traffic or parking in the close vicinity. The benefits of the proposal to the school and the training centre and the lack of harm to neighbouring properties and the open nature of the site, are considered to outweigh the slight infringement on the playing fields identified by Sport England. If permission is granted, the application will need to be referred to the Secretary of State in view of the objections raised by Sport England.

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 Secretary of State)**

#### **Subject to the following conditions:**

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

**Reason: To comply with Section 91 of the Town and Country Planning Act 1990**

- 2 The development hereby permitted shall not be carried out otherwise than in complete accordance with the plans approved under this planning**

permission unless previously agreed in writing by the Local Planning Authority.

Reason: In order to comply with Policy 37 of the Bromley Local Plan and in the interests of visual and residential amenity.

3 (a) Prior to commencement of the development hereby approved (excluding any ground clearance or demolition) a scheme for the provision of surface water drainage shall be submitted and approved in writing by the local planning authority.

(b) Before the details required to satisfy Part (a) are submitted an assessment shall be carried out of the potential for disposing of surface water by means of a sustainable drainage system (SuDS) to ground, watercourse or sewer in accordance with drainage hierarchy contained within the London Plan Policy 5.13 and the advice contained within the National SuDS Standards.

(c) Where a sustainable drainage scheme is to be provided, the submitted details shall:

i. provide information about the design storm period and intensity, the method employed to delay (attenuate) and control the rate of surface water discharged from the site as close to greenfield runoff rates (8l/s/ha) as reasonably practicable and the measures taken to prevent pollution of the receiving groundwater and/or surface water

(d) The drainage scheme approved under Parts a, b and c shall be implemented in full prior to first occupation of the development hereby approved

Reason: Details are required prior to the commencement of any new operational development in order to ensure that a satisfactory means of surface water drainage, to reduce the risk of flooding can be achieved before development intensifies on site and to comply with the Policy 5.13 of the London Plan and Policies 115, 116 and 117 of the Bromley Local Plan

4 The materials to be used for the external surfaces of the building shall be as set out in the planning application forms and / or drawings unless otherwise agreed in writing by the Local Planning Authority.

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

5 The use of the modular building hereby permitted for the Teaching School use shall be limited to Tuesdays, Wednesdays and Thursdays between the hours of 09.00 hours and 17.45 hours.

Reason: In order to comply with Policy 119 of the Bromley Local Plan and in the interest of the amenities of nearby properties.

6 No more than 70 delegates shall occupy the modular building hereby permitted at any one time.

**Reason: In order to comply with Policy 119 of the Bromley Local Plan and in the interest of the amenities of nearby properties.**

**7 No teaching of delegates shall take place within the main school.**

**Reason: In order to comply with Policy 119 of the Bromley Local Plan and in the interest of the amenities of nearby properties.**