

Committee Date	10/06/2021	Agenda Item:	
Address	Edgebury Grazing Land, Slades Drive, Chislehurst		
Application number	21/00570/FULL1	Officer	Jessica Lai
Ward	Chislehurst		
Proposal	Demolition of existing buildings (Land adjacent to Edgebury Primary School) and erection of a single storey new SEND school with associated pedestrian and vehicular access works, car park, pick-up and drop-off space, outdoor play area, MUGA and landscaping.		
Applicant		Agent	
Kerry Ducry Department for Education Fifth Floor Sanctuary Buildings 20 Great Smith Street London SW1P 3BT		Chris Maltby Edgeplan 3rd Floor 16 Upper Woburn Place London WC1H 0BS	
Reason for referral to committee	Major application and outside of delegated authority	Councillor call in No	

RECOMMENDATION	Approve
-----------------------	----------------

<p>KEY DESIGNATIONS</p> <ul style="list-style-type: none"> • Biggin Hill Safeguarding Area • London City Airport Safeguarding • Smoke Control • Urban Open Space • Green Belt • Site Allocation 37

Land use Details		
	Use description	Floor space (GIA SQM)
Existing	Grazing Land (Class sui generis)	N/A
Proposed	School	3,325sq.m

Vehicle parking	Existing number of spaces	Total proposed including spaces retained	Difference in spaces (+ or -)
Standard car spaces	N/A	100	+100
Disabled car spaces	N/A	5	+5
Enlarged parking spaces	N/A	5	+5
Motor cycle	N/A	2	+2
Cycle	N/A	13	+13

Electric car charging points	20 active and passive charging points
-------------------------------------	---------------------------------------

Representation summary	<ul style="list-style-type: none"> - One hundred and seventy-six (176) neighbour consultation letters were sent on the 22nd February 2021. - Two site notices were displayed on the 12th May 2021. - The application was advertised in the News Shopper on the 3rd March, 2021.
Total number of responses	170
Number in support	47
Number of objections	119

Section 106 Heads of Term	Amount	Agreed in Principle
Carbon offset	£ 39, 000	Yes
Highway Agreement S278	N/A	Yes
Total	£ 39, 000	

1. SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The site is allocated for education use in the Bromley Local Plan. The principle to relocate Majorie McClure Special needs school from the existing site at Hawkwood Lane to Site 37 – Land adjacent to Edgebury Primary School, Slades Drive is supported. The proposal would not result in loss of an existing facility in the local area. The proposal would also address the inadequacy of teaching and learning spaces for non-ambulant pupils.
- The design and layout of the proposal has taken into account its impact on Urban Open Space and Green Belt. The remodelling of the existing access from Slades Drive and provision of a new pedestrian access connecting the site to Edgebury would ensure adequate access arrangements can be provided including the required minibus for the pupils. The proposed car park would provide adequate spaces for the proposed use.
- The siting, scale and massing of the proposal is designed to ensure an acceptable level of outlook, privacy and sunlight and daylight can be maintained to neighbouring properties.
- The proposal would have an impact in terms of traffic condition in the area. However, it should be noted that the majority of pupils will arrive at school by mini-bus and the majority of staff attend the school before 8 am. The impact on traffic is considered to be within an acceptable level.
- The development is considered acceptable from a sustainability, air quality and environmental health perspective. Subject to the planning conditions, s106 legal agreement and s278 highway agreement, it is considered that the benefits of the proposal would outweigh any harmful impacts arising from this proposal and planning permission should be granted.

1. LOCATION

1.1 The application site is located on a slope which measures approximately 2.71 hectares in area. The site is vacant and was occupied as grazing land with stables and associated structures. The application site comprises of the following:

- Site 37 – Land adjacent to Edgebury Grazing Land and is allocated for education use in the Bromley Local Plan;
- An existing access connects Slades Drive to the north; and,
- A disused access between No. 23 and No.25 Edgebury and area of land connects to Site 37.



Fig.1 Bromley Local Plan Site 37 – Land Adjacent the Edgebury Grazing land

- 1.2 Site 37 is designated as Urban Open Space in the Bromley Local Plan. The existing access to Slades Drive, dis-used access between No.23 and No.25 Edgebury and area of land surrounding the site allocation are designated as Green Belt.
- 1.3 The site is adjoining Edgebury Primary School to the east and is surrounded by houses to the south and open fields to the west and north.
- 1.4 The site is located within Flood Zone 1 and is not subject to surface water flooding as defined by the Environment Agency.
- 1.5 The public transport accessibility of the site is rated at 1b on a scale between 0 to 6b where 0 is worst and 6b is excellent.
- 1.6 The site is not located within a conservation area and there is no listed building that would be affected by this proposal. There are no trees with Tree Preservation Orders located within the application or affected by the proposal. Belmont Pasture and Chislehurst Conservation area are located approximately 380 metres from the site.

2. PROPOSAL

- 2.1 Full planning permission is sought for the demolition of the existing buildings and erection of a single storey new SEND school with associated pedestrian and vehicular access, car park, pick-up and drop-off space, outdoor play area, MUGA and landscaping.
- 2.2 Marjorie McClure School is a special educational needs (SEN) school currently located in Hawkwood Lane. It is proposed to relocate the

existing school to the application site as the current accommodation is below the required standard for the pupils and staff.

- 2.3 The proposed new school building would be single storey in height, except the main hall near to the school main entrance and facing the proposed car park, which would be 8.2 metres in height. The proposed floor plan indicates that the proposal would accommodate a hydrotherapy pool, multi-purpose hall, two sensory rooms, a rebound therapy room, soft playroom and an array of specialist classrooms.
- 2.4 The footprint of the proposed building would be rectangular in shape and measures approximately 52 metres in width, 94 metres in length, 4.5 metres in height and the proposed main hall would measure 8.2 metres from the ground level.
- 2.5 The existing school has 100 pupils and 90 full time equivalent teaching and support staff. The number of pupils and staff attending the application site would be the same as the existing. There is a fleet of 20 mini buses currently serving the pupils.
- 2.6 A car park with a capacity of 100 parking spaces would be provided. The proposal car park would provide 4 dedicated minibus parking spaces, minibus pickup and drop off spaces for 5 minibuses, 2 motor cycle spaces, 5 disabled parking spaces and 5 enlarged parking spaces. A total of 13 cycle storage spaces would be provided.
- 2.7 The existing vehicular entrance from Slades Drive and the width of the existing vehicle access would be remodelled. The width of the existing access would be increased to 5.5 metres providing access for minibuses and 11 holding spaces for minibuses. A 1.2 metre wide pedestrian path would also be provided.
- 2.8 A pedestrian access via an existing disused access between No. 23 and No.25 Edgebury would be provided. This pedestrian access would be gated and not accessible by car.
- 2.9 A total of 3 individual trees and 6 trees groups would be removed and replacement trees and landscaping would be provided.

3. RELEVANT PLANNING HISTORY

- 3.1 There are no recent planning applications at this site

4. CONSULTATION SUMMARY

a) Statutory

4.1 Highways – No objection

The school has capacity for 100 pupils with 90 FTE staff on site of which 88% currently drive to work. That gives a requirement of 79 parking spaces, together with 5 disabled spaces, 5 visitor spaces and 11 turnover spaces gives a total of 100 spaces. A Transport Assessment (TA) was included with the application

The only proposed vehicular access to the site is via an improved junction from Slades Drive. The cul-de-sac section of Slades Drive and the access into the site will be widened so 2 mini-buses can pass each other. The main pedestrian access will be provided on Edgebury where a new 2 – 2.5m wide footpath will be provided between nos, 23 & 25. This access will be for staff and visitors who do not drive to the site.

Traffic surveys using Automatic Traffic Counters were carried out in Slades Drive, Belmont Lane and Edgebury between 11th – 17th December. Due to COVID restrictions these are unlikely to have been representative traffic counts and the flows were increased by 5.5% to take account of this. Turning count surveys were also carried out at the junctions of Green Lane / Belmont Road and Green Lane / Edgebury.

Edgebury Primary School have indicated that the school role was about 85% of full capacity on the days of the surveys.

The route to / from the new school for vehicles will be either Green Lane / Edgebury / Slades Drive or Green Lane / Belmont Lane / Slades Drive. The proposed traffic flows have been split between the routes using the post codes of staff and pupils.

The modal split of travel to the new school was assumed to be the same as the existing. Traffic flows with and without the proposed school taken from the TA are shown below. The count locations were - Slades Drive 1 was between the proposed access and Imperial Way, Slades Drive 2 was between Imperial Way and Edgebury, Belmont Lane was between Laneside and Woodside Av and Edgebury was between Beechwood Rise and Domonic Drive. Additional flows in the hours beginning 07:00 and 16:30 are staff only.

Link	Time Period	Existing traffic flows			Flows with school traffic		
		Inbound	Outbound	2-way	Inbound	Outbound	2-way
Slades Drive 1	07:00-08:00	6	16	22	66	16	82
	08:00-09:00	13	21	34	75	62	137
	15:15-16:15	24	17	41	66	80	146
	16:30-17:30	23	16	39	23	68	91
Slades Drive 2	07:00-08:00	31	74	105	91	74	165
	08:00-09:00	83	110	193	145	151	296
	15:15-16:15	110	95	205	152	158	310
	16:30-17:30	96	64	160	96	116	212
Belmont Lane	07:00-08:00	53	92	145	89	92	181
	08:00-09:00	120	95	215	160	123	283
	15:15-16:15	131	114	245	159	157	316
	16:30-17:30	87	104	191	87	139	226
Edgebury	07:00-08:00	55	37	92	79	37	116
	08:00-09:00	80	120	200	102	133	235
	15:15-16:15	109	103	212	123	123	246
	16:30-17:30	66	90	156	66	107	173

Modelling of the junctions of Green Lane / Belmont Road and Green Lane / Edgebury indicate the junctions are well below capacity and there is very limited queuing.

The 2 main highway impacts are likely to be on Belmont Lane and at Edgebury Primary School. Belmont Lane, particularly the end nearest Green Lane, has parking on both sides which reduces the road to one way working with gaps left for crossovers and a section of yellow line used as passing places. It is also a bus route. In the 4 hours with school related traffic generation the traffic flows in Belmont Lane are estimated to increase by between 34 to 71 vehicles per hour. In Edgebury the increases would be between 17 to 35 vehicles per hour and in Slades Drive between 52 – 105 vehicles. These vehicles would already be on the roads in Chislehurst going to / from the existing site.

The TA indicates the normal school day is 08:35 – 15:15 with pupils being dropped off between 08:15 to 09:15 and picked up from 14:45 – 15:45. This puts them in conflict with the drop off and pick up times from Edgebury Primary School.

Further survey information was received regarding the travel patterns at the existing Marjorie McClure site which showed that the arrivals / departures are more spread out than the TA indicated thus reducing the potential conflict with the primary school traffic.

A Stage 1 RSA was supplied with the application which covered the new access, widened cul-de-sac and modified junction with the main section of Slades Drive. There were 2 issues identified. The first was at the modified junction of the cul-de-sac with the main section of Slades Drive where forward visibility is obstructed by on-street parking. It was recommended that a short section of waiting restriction be introduced on Slades Drive to increase the forward visibility. An alternative would be to introduce a build out to prevent parking along a section of Slades Drive.

The second issue was vegetation obstructing the sightline for vehicles turning right out of the proposed access onto Slades Drive. This may be due to the lack of a tenant on the grazing land and consequently the vegetation has become overgrown. The land is LB Bromley owned and it would not appear to be a major issue to remove it and provide adequate sightlines.

The school is relocating within Chislehurst, the traffic associated with the school is already on the network. The school is currently located next to Coopers school and the proposed site is similar being next to Edgebury primary. There are 2 potential issues, increased traffic using Belmont Lane and traffic going past Edgebury primary. However, the flows are spread out over a number of hours and may be more of an inconvenience than a highway safety issue. A similar scenario occurs currently in Hawkwood Lane with Coopers School. No accidents have been recorded in Hawkwood Lane since 2013.

There appears to be an alternative access via Edgebury that would overcome these issues. However, the issues are not thought to be so significant as to

raise an objection on safety grounds to the proposal as set out in the application with the Slades Drive access.

The following conditions should be attached should planning permission is forthcoming:

- OC03 parking
- OC10 servicing and delivery plan
- ND16 hardstanding for wash down facilities
- AG12 cycle parking
- AG13 lighting scheme
- PC17 construction management plan
- AG14 travel plan

Non- standard condition

Before any work is commenced on the access/highway works a Stage 2 Road Safety Audit shall be submitted to and approved in writing by the local Planning Authority. The works shall be implemented strictly in accordance with the approved details to the satisfaction of the local Planning Authority before any part of the development hereby permitted is first occupied. A Stage 3 Audit shall be submitted to and approved in writing by the local Planning Authority following satisfactory completion of the works and before they are opened to road users.

The applicant must enter into a s278 with LB Bromley in respect of the highway works, the widening of Slades Drive and any measures to ensure visibility is met. Otherwise there should be a condition that the applicant enters into a s278 agreement with the Council.

4.2 Drainage - No objection

The proposal shall be implemented in accordance with the submitted Flood Risk Assessment Report carried out by AKSWard Construction Consultants with job No. X202026 dated January 2021, Drainage Strategy & Water Quality Management Report carried out by AKSWard Construction Consultants with job No. X202026 dated 15/01/2021.

b) Local groups

4.3 Natural England

Natural England has no comments to make on this application. Natural England has not assessed this application for impacts on protected species. Natural England has published a standing advice which can be used to assess impacts on protected species. Natural England and the Forestry Commission have also published standing advice on ancient woodland and veteran trees which you can use to assess any impacts on ancient woodland. The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites

or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision-making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.

4.4 Thames Water - No objection

Thames Water have raised an objection with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity. 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.

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

Thames Water have raised no objection with regard to water network and water treatment infrastructure capacity. 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. Should mains water be used for construction purposes, consent from Thames Water should be obtained in order to avoid potential fines for improper usage.

4.5 Friends of Edgebury Field – Objection

The proposed access is not considered suitable and the proposal would have an adverse impact on traffic conditions of the surrounding area. The proposed school and construction of the school would increase pollution, congestion impact on safety of the area. Both No.160 & 162 bus routes use Belmont Lane prior to the junction with Edgebury. It is not clear whether Transport for London, (TfL), has been consulted by the Developer regarding increased traffic in Belmont Lane and outside Edgebury Primary school. The traffic survey was carried out during the lock down. The junction near to Belmont Parade and Green is often congested and used by four bus routes (No.61, 160, 162 and R7). The proposal would increase traffic congestion in the area. The width of Slades drive is 5.5 metres width. The access issue was raised by the Council at pre-application stage and not addressed in the application. The amount of traffic would be increased with 20 mini-buses and 24 car/taxis attending the site by pupil, including the weekend. 90 full time staff would attend the site and 88% of the staff would be using a car and 100 parking spaces would be provided.

The proposed pedestrian entrance on Edgebury is located on a bend and is unsuitable.

The site is allocated for a school in Bromley Local Plan and the status is changed from green belt to urban open space. It is unclear the extent of land has changed to urban open space and local community were not consulted about this change. The Local Plan should be revisited. The new school building would be 7 to 10 metres from the houses of Edgebury and would be 9 metres high and impact on the residential amenities of the domestic houses. There is water runs along the track towards the houses. The site is subject to surface water flooding and the proposal increased flood rise.

4.6 The Chislehurst Society – Objection

The Chislehurst Society supports the new school premises proposed for Marjorie McClure School. But we have considerable concerns about the works proposed for the access way and the consequential traffic impacts on residents of Slades Drive from the building work traffic and the traffic movements of the operating school.

The scheme plans for a drop-off area to accommodate 20 minibuses and car park capacity of up to 100 spaces. The number of spaces required reflects the significant number of part-time specialist staff attending the school. Vehicular access to the school is proposed via an 'existing' track from the site's northern boundary fronting Slades Drive (cul-de-sac). This track will require significant repair (we suspect rebuilding including new foundations in places) and widening to 5.5m to enable two minibuses to pass each other. A 1.2m footway is proposed along one side of the access way.

Access for the construction traffic for the new school, including the rebuilt access way, appears to be via Slades Drive which is narrow. The proposal would have an adverse impact during construction. The Council's officers are urged to consider the following:

- Alternative vehicular/pedestrian access at the junction of Belmont Lane. Slades Drive opposite Imperial Way to facilitate the new school and construction works.
- The access way to abut the north and west boundary lines of Edgebury Primary School grounds until it reaches the boundary of the proposed Marjorie McClure School
- Amendment may be required to the layout of the vehicle circulation/parking area.
- This entrance would provide a shorter pedestrian pathway to the new school.
- No pedestrian access should be provided from space between 23/25 Edgebury for road safety reasons.
- Discussion with Edgebury Primary School to determine whether or not a pedestrian entrance gate can be created from the Edgebury school entrance way (between 77/79 Edgebury) for Marjorie MacClure staff who do not travel by car.

4.7 Royal Borough of Greenwich

The Royal Borough has formally considered the matter and raises no objections.

c) Adjoining Occupiers

4.8 Forty-seven (47) letters of support are received and the grounds of support are as follows:

1. The site is allocated for education use and the proposal is acceptable in land use terms
2. The proposed SEND school creates less disturbance than a full-sized secondary school
3. The existing school is not fit-for- purpose. The proposal school is well designed to support the needs of the existing pupils. A swimming pool would be provided for weekend swim session for SEND children and is very welcome
4. As a parent, I have taken my children to Marjorie Maclure 12 times for the past 3 years. The proposal would increase the amount of the traffic but not at a significant level.
5. The majority of pupils are being transported to the school unlike the typical primary or secondary school where parents attend the school on a daily basis. No objections from statutory consultees
6. Not possible to rebuild a new school at the current site and there are no other alternative suitable sites in Bromley for education use.

4.9 One hundred and nineteen (119) letters of objection have been received and a summary of the grounds of objection are as follows:

1. Loss of urban and open space and impact on Green Belt
2. Highway
 - The access to the school via/ across a cul-de-sac is narrow and unsafe.
 - Green Lane is the main arterial road servicing the area and is wide enough to cater for the additional traffic. The proposed access should be closer to Green Lane instead of sending the traffic to Edgebury and Slades drive
 - The access to the school should be re-considered due to the amount of existing traffic and parked cars on neighbouring roads. Alternative access should be used such as the existing access to Edgubury Primary School, access between 77 to 79 Edgebury, No. 23 and No25 Edgubury and junction to Imperial Drive should be used
 - No safety assessment for the proposed pedestrian path

- Parking restrictions or access to other properties are not considered. New zig-zag area or crossings should be considered on Edgebury for the proposed new pedestrian access to the school.
- Edgebury primary school is yet to be at full capacity. Since Edgebury School has started a two-form intake. The traffic condition is likely to worsen. There is significant inconsiderate or illegal parking at the Belmont Lane/ Green Lane junction.
- Transport for London should be consulted on traffic safety and bus routes on Edgebury and Belmont Lane
- Belmont Lane and Edgebury are residential roads and are heavily congested during school run hours. Surveys were carried out during school holiday and lock down periods and the finding is inaccurate and misleading. The proposal would exacerbate the current traffic problems caused by Edgebury Primary School between the junctions of Edgebury/Belmont Lane/Slades Drive / Imperial Way
- Increased traffic and traffic noise. The traffic in the area is already congested in particular during the school run hours.
- The blind bend just past Edgebury Primary school at the junction with Edgehill road will become an accident blackspot

3. Location

- Site is on the edge of Bromley.

4. Wildlife

- Loss of wildlife and trees, impact on nesting swallows, woodpeckers, blue tits and smaller birds that live in the hawthorn bushes and trees
- Loss of grazing land for horses
- No bat assessment.
- Survey was carried out during hibernation and new surveys should be provided

5. Local plan

- Local residents were not consulted regarding the site allocation

6. Residential amenities

- Over 180 properties would be affected during the construction.
- The proposed school building should be sited further away from the houses on Edgebury
- Light pollution, loss of sunlight, daylight, outlook and privacy contrary to NPPF para 180 (a-c)
- Noise impact assessment considered the impact to the school not the impact on residents.
- 2.4 metres high web mesh boundary fence would be a very unattractive feature
- School facilities would be open to public after the school hours

- Pedestrian path would compromise the security of the neighbouring properties. The remainder of the open field would be insecure.

7. Air quality

The proposal would attract 250 cars per day and would have an adverse impact on air quality

8. Flooding

- The houses on Edgebury suffers from localised flooding due to the topography of the site. The proposal would increase the risk of flooding and surface water flooding
- Flood risk report did not consider the risk to the neighbouring houses.
- Increase risk of subsidence

9. Safety

- Opens up easy access to the remaining site to unauthorised occupation or operations such as fly tipping and antisocial behaviour

10. Others

- The 120 letters of objections should be taken into account.
- The consultation on the council website is kept open
- No information regarding to access and management of the adjacent open space
- Brownspring Drive is named after the spring flowing under the site

5. POLICIES AND GUIDANCE

5.1 National Policy Framework 2019

5.2 NPPG

5.3 The London Plan

- Policy D4 Delivering good design
- Policy D5 Inclusive design
- Policy D11 Safety, Security and resilience to emergency
- Policy D12 Fire safety
- Policy S3 Education and childcare facilities
- Policy G1 Green infrastructure
- Policy G2 London's Green Belt
- Policy G5 Urban greening
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodlands
- Policy SI-1 improving air quality

- Policy SI-2 Minimising greenhouse gas emission
- Policy SI-3 Energy infrastructure
- Policy SI-5 Water infrastructure
- Policy SI-12 Flood Risk management
- Policy SI-13 Sustainable drainage
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car parking
- Policy T6.5 Non-residential disabled persons parking
- Policy T7 Deliveries, serving and construction
- Policy DF1 Delivering of the Plan and Planning Obligations
- Policy M1 Monitoring

5.4 Mayor Supplementary Guidance

- Energy Assessment Guidance
- Accessible London: Achieving an Inclusive Environment (2014)
- Sustainable Design and Construction (2014)
- Shaping Neighbourhoods: Character and Context (2014)

5.5 Bromley Local Plan 2019

- Policy 20 Community Facilities
- Policy 27 Education
- Policy 29 Education Site Allocations
- Policy 30 Parking
- Policy 31 Reliving congestion
- Policy 32 Road Safety
- Policy 33 Access for All
- Policy 37 General Design of Development
- Policy 49 The Green Belt
- Policy 55 Urban Open Space
- Policy 69 Development and Nature Conservation Sites
- Policy 70 Wildlife Features
- Policy 72 Protected Species
- Policy 73 Development of Trees
- Policy 74 Conservation and Management of Trees and wood lands
- Policy 79 Biodiversity and Access to Nature
- Policy 109 Airport Public Safety
- Policy 113 Waste Management in New Development
- Policy 115 Reducing Flood risk
- Policy 116 Sustainable Urban Drainage System
- Policy 117 Water and Wastewater Infrastructure Capacity
- Policy 118 Contaminated Land
- Policy 119 Noise Pollution
- Policy 120 Air Quality
- Policy 122 Light Pollution

- Policy 124 Carbon Dioxide Reduction, decentralised Energy Networks and Renewable Energy
- Policy 125 Delivery of Local Plan

5.7 Bromley Supplementary Guidance

Planning Obligations (2010) and subsequent addendums

6.0 Assessment

6.1 Principle of development – Acceptable

Relocation of existing school

- 6.1.1 Planning permission is sought for the relocation of Majorie McClure from the existing site at Hawkwood Lane to Site 37 – Land adjacent to Edgebury Primary School, Slades Drive. Bromley Local Plan Policy 20 states planning permission will not be granted for proposals that would lead to the loss of community facilities, unless alternative enhanced provision is to be made in an equally accessible location for the community it serves.
- 6.1.2 Marjorie McClure is a special educational needs and disability school (SEND) for ages between 3 to 18 and caters for pupils with a wide range of different complex needs including physical, medical, sensory and learning needs. The Ofsted inspection reports and records indicate that Marjorie McClure has a capacity of 100 pupils and there are 100 pupils attending the school. These records indicate that there is an established need for a SEND school in this part of the Borough and is essential to ensure adequate teaching and learning environments can be provided for the pupils in need in the Borough.
- 6.1.3 The existing school is located on Hawkwood Lane, adjacent to the Coopers School buildings including a Grade II Listed building fronting Hawkwood Lane. The Department for Education published an area guideline for SEND and alternative provision (Building Bulletin 104). The applicant has indicated that the current school premises is a third below the Department for Education recommended spaces for a special school with non-ambulant pupils and has significantly less outdoor space than recommended. There is a need to address this inadequacy for the benefits of the pupils.
- 6.1.4 A feasibility study was commissioned by the Department of Education to review the conditions and options for the school including refurbishment and remodel of the existing school. Due to the existing site and building constraints, the provision of a purpose built school and relocation of the school in the local area is considered the most feasible option to comply with the required standard without causing any loss of existing education services in the Borough, in line with BLP Policy 20. The proposal would also ensure a good teaching and learning environment for the pupils. It

should be noted that the existing school site is located within Chislehurst Conservation Area and behind a Grade II listed school building. The potential to provide the required internal and outdoor spaces for the pupils at the current site is limited. Given the existing site and buildings constraints, the principle to vacate the site and relocate in the local area is supported.

Site allocation

- 6.1.4 BLP Policy 29 states the Council will seek to meet the need for education provision over the Local Plan period by allocated sites for educational purposes and re-designated school sites in Green Belt and Urban Open space. Appendix 10.4 of the Bromley Local Plan set out a list of allocated sites for education purposes.
- 6.1.5 The subject site, Site 37 is allocated in the Local Plan for education use to provide a secondary school. The Council's Director of Education was consulted and has advised that "the need for school places in Bromley has changed since the education needs statement supporting the Local Plan was produced. There are sufficient sites identified elsewhere within the Local Plan to meet projected secondary need without the use of the land adjacent to Edgebury Primary School. On this basis the Education Department is supporting the use of this site for the rebuilding of Marjorie McClure".
- 6.1.6 The applicant has indicated that the education background dated for the local plan was prepared in 2016. There was a projected need based on the GLA school roll projection, including the additional 5 percent capacity required for contingency and choice, for up to 32 additional forms of entry at secondary age across Bromley. Since this time the projected increase has reduced and the Borough's need will be met through the expansion of Bishop Justus (2 additional forms of entry) and the opening of 3 secondary free schools providing 20 forms of entry, Of these Eden Park High School (8FE) is open, Bullers Wood School for Boys (6FE) has open in temporary accommodation and is due to move into its permanent accommodation.
- 6.1.7 It is acknowledged that the projection for secondary school places has changed since the background paper was provided in 2016, the proposal would have an implication of secondary provision at this location. However, it should be noted that approximately 61 percent of the existing pupils currently attending Marjorie McClure are of secondary age. In addition, the moving of Marjorie McClure from the Coopers School compound would provide an opportunity for Coopers School to increase the intake of secondary pupils, should there be a local demand. As such, it is considered that the impact on secondary school provision would be limited in the local area. The provision of a new SEND school is therefore supported.

Urban open space

- 6.1.8 BLP Policy 55 states proposal for built development in Urban Open Space will be permitted 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 education 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 does not exceed the site coverage of the existing development on the site.

Where there is a demonstratable 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 comprising 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,

- 6.1.9 The application site is allocated for education use in the Bromley Local Plan. Whilst the site is designated as Urban Open space, the proposal for a new school is related to its allocated use. The proposal to introduce a new school building at this site is therefore supported and complies with the BLP.
- 6.1.10 BLP Policy 27 requires education development should be sensitively designed to minimise the footprint of building and the impact on open space as well as seeking to secure, as far as possible the privacy and amenities of any adjoining properties. The assessment of these requirements is outlined in the following section of this report.

Green Belt

- 6.1.11 BLP Policy 49 states that within the Green Belt permission will not be given for inappropriate development unless very special circumstances can be demonstrated that clearly outweigh the harm by reasons of inappropriateness or any other harm.
- 6.1.12 Site 37 is land locked by the surrounding houses, open fields and Edgebury Primary School. The existing vehicular access connecting the site (Site 37) to Slades Drive and the proposed new pedestrian access are both designated as Green Belt. The proposed remodelling and widening works and provision of a new pedestrian access to Edgebury would constitute inappropriate development in Green Belt. However, it should be noted that the proposed works is designed to provide essential access to this allocated site. The proposal would provide a new school building and provide an improved education service in the Borough, the proposed works would maintain a good degree of openness. As such, it is considered that the benefits that can be derived from this proposal

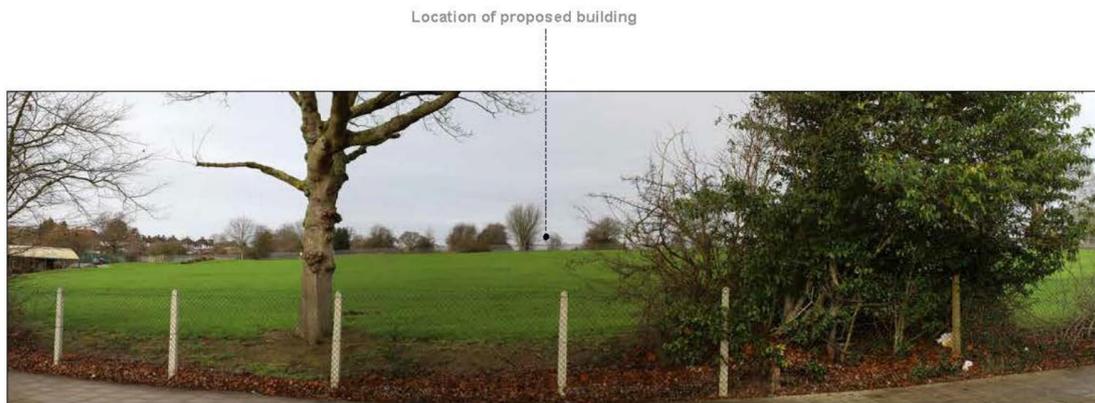
would outweigh the harm to the Green Belt resulting in very special circumstances. Therefore, the proposal is considered acceptable.

6.1.13 A Landscape and Visual Impact Assessment is submitted which indicates View 10a to View 10c would be relatively more visible on Slades Drive. However, due to its siting, height of the proposed building and distance from the road, it is considered that the visual impact upon the Green Belt would be limited.



Viewpoint 10A

View 10a



Viewpoint 10B

View 10b



Viewpoint 10C

View 10c

Loss of stables/grazing land

6.1.13 Objection is raised to the loss of stable and grazing land. The ordnance survey map indicates that the existing unlisted stables and structures were constructed between the 1980s and 1990s. The application site was last occupied as grazing land and has been vacant in excess of a year. The condition of the existing stables and associated structure are poor and deteriorated. Given the conditions of the existing stables and the fact the site is allocated for education use, it is considered that the loss of existing private facilities would not be unacceptable in this instance.



Photo1 and 2 : Existing stable

6.2 Design

- Siting and layout

6.2.1 The siting and layout of the proposal is influenced by a number of factors such as topography of the site, location of retained trees, access to the site and relationship with its surroundings. The proposed building would be single storey occupying the western portion of the site. The proposed car park would be located to the front of the proposed building directly connected to the access road.

6.2.2 The internal and external circulation of the proposal school is well designed ensuring clearance spaces can be provided for the pupils who require mobility aids, equipment or wheelchairs within the building. Two internal outdoor courtyards would be provided within the footprint of the proposed building. The proposed layout is designed to maximise the availability of natural light for end users providing a good quality learning environment for the pupils. Rooflights would be installed to allow more natural light into the building. Canopies would be attached to the front/north elevation and east elevation of the proposed building and this

would ensure adequate shelter can be provided in the wind, or rain. It is considered that the siting and layout of the proposals would be acceptable.



Fig 2. Proposed layout

- Scale and massing

6.2.3 The proposal is designed to provide an inclusive environment for the end users and is well collected to the proposed outdoor spaces. The proposed building would be single storey in height (except for the hall) and would be positioned 7 metres north from the rear boundary of the houses between No. 41 and No. 54 Edgebury. The main bulk of the proposed building would be facing its proposed outdoor spaces to the east. The proposed south elevation facing the houses of Edgebury would be limited to 4.5 metres in height. The proposed outdoor sports pitch would be located approximately 55 metres away from the rear boundaries of the houses on Edgebury.

6.2.4 The proposed main hall would be 8.2 metres in height and would be positioned approximately 80 metres from the rear boundary of the houses on Edgbury. The main hall can be used as covered sport/play spaces during winter and in poor weather conditions.

- External materials

6.2.5 The proposed palette of materials would mainly comprise of buff brick light grey/brown in colour. The school sign on the front elevation of the building would be made of metal in the form of free standing letters. The windows and doors would be double glazed and would be decorated

with blue louvres to the classroom providing additional ventilation. The selection of external finishes are of good quality and would provide a good degree of visual attractiveness.

6.2.6 A range of boundary treatments including 1.8 and 2.4 metre high weld mesh fences, 1.2 metres high timber fencing and sport fencing are indicated. A range of hard landscaping and surfacing materials including reinforced grass, rubber safety surfacing and block paving are also indicated. The outdoor play areas would be installed with raised timber planters provided in the outdoor spaces.



Front Elevation - Main hall sits above main accommodation. Canopy above entrances. Buff brick, blue glazed brick to entrances two tone fibre cement board on hall, grey metal trim

Fig 3 Proposed front/ north elevation



Side SE Elevation - Primary Classrooms & Delivery Entrance. Main hall sits above main accommodation. Canopy above EY and primary classrooms. Buff brick, blue glazed brick to entrances two tone fibre cement board on hall, gray metal trim

Fig 4 Proposed side/ east elevation

Secured by Design

6.2.7 Objections are received concerning the security of the neighbouring properties and that there is no information regarding the use of the adjoining open fields.

6.2.8 The Designing Out Crime officer was consulted, and no objection was raised in respect of this proposal. The school is designed to ensure the premises would be secured during the day and night time hours.

6.2.9 It should be noted that the open fields adjoining to the site does not form part of this application and no development is proposed as part of this application.

6.2.10 The proposed access including the pedestrian access from Edgebury would be secured and gated. In line with the recommendation of the Designing out crime officer, it is considered that a secured by design condition requiring the development to achieve designed by design accreditation be attached, should planning permission is forthcoming.

6.3 Neighbourhood Amenity - Acceptable

Sunlight and daylight

- 6.3.1 The application site adjoins the residential houses between No.23 and No.75 Edgebury. The length of the rear gardens of these houses varies and ranges between 25 metres and 28 metres.
- 6.3.2 The proposed new school would be sited 7 metres from the rear boundaries of Edgebury. The proposed new school building would be limited to single storey in height and measures approximately 4.5 metres, except the proposed main hall element which would be 8.2 metres near the proposed car park. This element would be approximately 80 metres from the rear boundaries of Edgebury and approximately 106 metres from the rear wall of houses on Edgebury.
- 6.3.3 Due to its siting, orientation, and distance to the neighbouring properties, it is considered that the proposal would not result in a significant reduction or impact in terms of loss of sunlight, loss of daylight and overshadowing.
- 6.3.4 The houses on Brownspring Drive are mainly adjoining the area of open field. The proposed school building would be located approximately 160 metres from its rear gardens. Due to this distance, it is considered that the proposal would not have an adverse impact on sunlight and daylight.

Outlook and privacy

- 6.3.5 The outlook of the residential houses on Edgebury adjoining to the site would be affected. The views would be changed from that of an open field to a school with outdoor spaces associated to the school. However, it should be noted that application site is allocated for education use in the Bromley Local Plan and this is the formal adopted plan following its adoption process. The siting and scale of the proposed building has taken into account its relationship with its surrounding properties. The proposed building would be limited to single storey in height and a good distance would be maintained. The proposed landscaping plan indicates that new planting would be incorporated along the southern boundary. On this basis, it is considered that a good degree of outlook and privacy can be maintained between the existing and proposed use.
- 6.3.6 The houses on Brownspring Drive would also experience a loss of outlook. However, the impact is considered to be limited as the application site is adjoining onto an area of open field. It is considered that the proposal would not have an adverse impact on residential amenities in terms of loss of outlook and privacy.



Photo 3. Rear of the houses on Edgebury

Noise

- 6.3.7 The use of the proposal is considered to be compatible with its surrounding residential uses. The activities associated to the school would be mainly within the school building. The outdoor activities would be limited to the exercise, learning and sports facilities associated to the school. The proposed layout is designed to minimise any unacceptable noise that could be generated from the school. The minimum distance between the proposed outdoor sport facility and the rear boundary of the houses on Edgebury measures approximately 55 metres. Due to its proposed layout and distance to the residential houses. The school is open from 7am to 6pm and would not be used during unsociable hours. As such, it is considered that the proposal would not have an adverse impact in terms of noise and disturbance

Air and light pollution

- 6.3.8 An air quality assessment is submitted as part of this application and confirms the proposal would not be in breach of the legal limits for concentration in outdoor air of major pollutants that affect public health. The proposed renewable energy would be general from clean renewable sources (Solar panel and air source heat pump). As such, it is considered that the proposed development would be compatible to its surrounding uses and would not have an adverse impact on air quality.

Light

- 6.3.9 There are no sports pitch floodlights proposed for the MUGA and outdoor ball game area. The external lighting would comprise of wall or fence mounted light post lighting and bollard lighting in the car park and

pedestrian walk way between the proposed school building and the outdoor landscaping area. As such, it is considered that the proposal would be acceptable.

Construction period

- 6.3.10 The demolition and construction works would have an impact on air quality, noise and road safety during the construction works being carried out at the site. The Construction Environmental Management Plan secured via a planning condition would need to provide the details of haulage route, vehicle size and delivery hours as well as taking into account the uses and activities along Belmont Lane, Edgebury and Slades Drive.
- 6.3.11 The construction and management plan would also need to consider the impact on pedestrians, cyclists, and vehicles as well as fully considering the impact on other developments in close proximity. Subject to the details being acceptable to the Council's Environmental Health and Highways divisions, it is considered there the proposal would not have an unacceptable impact during its construction phase.
- 6.3.12 Objections are received regarding to the requirement to consult Transport for London. The application site is not located on a Transport for London Road Network and consultation with Transport for London is not required.
- 6.3.13 Objections are also received regarding consultation periods being extended and the supporters of this proposal are not local residents. The comments are noted and it should be note that there is no further consultation carried out and the planning consultation period is in line with the statutory requirements.

6.4 Transport Acceptable

- Access

- 6.4.1 Objections have been received with regard to the proposed vehicle and pedestrian access arrangements and highway safety. A number of residents consider that the existing disused vehicular access between No.23 and No.25 Edgebury should be reused as this location would be closer to Green Lane. A number of residents have considered that the vehicular access should be located elsewhere or shared with Edgebury Primary School.
- 6.4.2 The existing vehicular access from Slades Drive is an unmade track and would be used to provide access to the school. A new priority T-junction onto the Slades Drive cul-de-sac to the north of the site is proposed. This will incorporate the widening of the existing 3.4 metres wide access track to 5.5 metres. This allows two minibuses to pass each other. A 1.2 metre

wide walkway adjacent to the vehicular access would also be provided for pedestrians.

The Council's highway division advised that a Stage 1 Road Safety Audit was submitted which covered the new access, widened cul-de-sac and modified junction with the main section of Slades Drive. There were 2 issues identified:

1. The modified junction of the cul-de-sac with the main section of Slades Drive where forward visibility is obstructed by on-street parking. It was recommended that a short section of waiting restrictions be introduced on Slades Drive to increase the forward visibility. An alternative would be to introduce a build out to prevent parking along a section of Slades Drive.
2. The second issue was vegetation obstructing the sightline for vehicles turning right out of the proposed access onto Slades Drive. This may be due to the lack of a tenant on the grazing land and consequently the vegetation has become overgrown. The land is LB Bromley owned and it would not appear to be a major issue to remove it and provide adequate sightlines.

The Council's highway officer has raised no objection to the proposed access and arrangements to the access provided that a Stage 2 Road Safety Audit is submitted to and approved in writing by the local Planning Authority, prior to any works commencing on site. A Stage 3 Audit shall be submitted to and approved in writing by the local Planning Authority following satisfactory completion of the works and before they are opened to road users.

6.4.3 A new pedestrian footpath would also be provided to connect the site south to Edgebury. This access will be gated at all times and access controlled through an intercom system. This provides a link for staff who walk, cycle and use the public bus service to travel to and from the school. There is no vehicular access proposed from Edgebury or near to the existing vehicular access associated to Edgebury Primary School on Edgebury or Slades Drive.

6.4.4 The applicant has advised that a feasibility study was undertaken, and three alternative access options were considered and discounted. The considered options and discounted reasons are as follows:

- Alternative Option 1 – Access off Slades Drive opposite Imperial Way

6.4.5 Due to the level difference between the open area and Slades Drive, significant mitigation would be required and is not considered appropriate to introduce a new access on green belt. New access near to Imperial Way would require restrictions and this would have further impact on local residents requiring on-street parking spaces. Furthermore, the access would require significant visibility requirements

due to its location being located on the inside of the bend. A significant number of existing trees and bushes removal would be required to accommodate this access. New access near to the existing Edgebury Primary school access on Slades Drive would increase conflict between vehicles turning into and out of the proposed school and students walking to Edgebury. As such, this option is not considered appropriate.

- Alternative Option 2 – Access via the existing primary school access on Edgebury

6.4.6 There are serious safety concerns due to the increased conflict between vehicles turning into and out of Marjorie McClure School whilst Edgebury pick-up and drop-off activity is occurring. As such, this option is not considered appropriate.

- Alternative Option 3 – Access between No. 23 and No.25 Edgebury

6.4.7 Provision of a vehicular access between No.23 and No.26 Edgebury would require further removal of the existing mature Horse Chestnut tree and creation of a new access on Green Belt. An access via this route would also adversely impact the potential for providing a viable on-site layout due to the existing ground levels and the mature oak tree. As such, this option is not considered appropriate.

6.4.8 The applicant considers that the proposal to utilise the existing vehicular access would be the most suitable options. The proposed access road widening work would prevent any minibus queues on public highway.

The Council's Highway Division has advised that "alternative access arrangements were considered within the Transport Assessment. The potential alternative between No.23 and No.25 Edgebury was not greatly explored as part of the application. It would appear to have a number of advantages in highway terms over the proposed option. The travel time and distance would mean all vehicles are likely to use Green Lane / Edgebury to access the new school which would mean no vehicles going to / from the proposed school would have to use Belmont Lane or go past Edgebury Primary school. It would also reduce the total distances that vehicles would need to travel".

6.4.9 Having considered the justification provided above, it is considered that the proposed access would appear to be the best option when compared with the other options. There are no other options which could provide adequate parking spaces for the required minibus and whilst it is recognised that Option 3 could have some advantages in highways terms there would be some adverse impacts including the loss of a tree and the overall site layout would be affected. As such, it is considered the proposed access arrangement would be acceptable when considering the proposal as a whole.

- **Parking standards**

6.4.10 There are no maximum or minimum parking standard for schools in the London Plan and Bromley Local Plan. London Plan Policy T6 states parking standard should be restricted in line with level of existing and future public transport accessibility and connectivity. London Plan paragraph 10.6.5 states where no standard is provided, the level of parking should be determined on a case-by case basis. London Plan Policy T6.5 states appropriate disabled persons parking for Blue Badge holders and table 10.6 indicates that 5 percent of parking spaces should be designed for disabled parking and a further 5 percent enlarged spaces.

6.4.11 The existing school in Hawkwood Lane has 130 staff members including 22 teaching staff and 108 support staff. This is equivalent to 90 full time staff. There are 67 parking spaces at the existing school site which is not sufficient to meet the current demand at the existing school.

The number of pupils and staff attending the proposed site would be identical to the existing. The existing school mode shares are as follows:

Travel mode	Mode share	Number
Student		
Minibus	78%	78
Taxi	5%	5
Car	17%	17
Total	100%	100
Staff		
Walk	4%	4
Cycle	4%	4
Bus	3%	3
Car	88%	79
Total	100%	90

6.4.12 The proposed car park would provide 100 parking spaces with five disabled parking spaces and five enlarged parking spaces. The proposed plan indicates that a pick up and drop off area for up to 5 school minibuses near the main entrance to the school would be provided and a further 4 dedicated minibus parking spaces would be provided in the proposed car park. The existing access road would be remodelled to ensure adequate access width and additional waiting areas can be provided for the school minibus.

6.4.13 The school currently have 100 pupils and 90 full time equivalent staff. The majority of pupils are transported to the school by a fleet of 20 school minibuses. It should be noted that some minibuses transport only one student whilst others may transport up to 5 students, depending on the pickup location and requirements of the pupils. The provision of adequate mini-bus accommodation is considered to be essential for the pupils in this case.

6.4.14 The proposal is designed to ensure adequate minibus parking spaces can be provided without causing any potential queueing on the public highway. The proposed car park and access layout including the swept path analysis demonstrates that the proposal can accommodate the required minibuses within the site. It is considered that this part of the proposal is acceptable and would not have an adverse impact on the highway.

6.4.15 The proposal would provide 100 off-street parking spaces for teaching and supporting staff including visitors. It is noted that this is based on the current travel mode and demand of off-street parking spaces for staff. However, the number of parking spaces is considered to be high. Development proposals should promote sustainable modes of transport such as walking, cycling and public transport. It is considered that the usage and allocation of parking spaces should be managed to meet the demand of the school. It should be noted that the site is relatively more accessible or connected by bus with a relatively shorter walking distance to the bus stops when compared with the school site on Hawkwood Lane. Subject to the details of a car parking management plan and a school travel plan, it is considered that the level of parking provision is acceptable in this instance.

6.4.16 The current travel mode does not include motorcycle. Two motorcycle spaces would be provided for staff.

- *Electric Charging point*

6.4.17 London Plan Policy T6.G set out the electric charging points requirements for residential, office and retail use. There is no minimum or maximum requirement for such provision in the Local Plan. Bromley Local Plan Policy 30 requires 1 in 5 spaces have provision (both active and passive) for electric vehicle charging points. A total of 20 electric charging points provision would be secured by a planning condition.

- *Cycle parking*

6.4.18 Table 10.2 of the London Plan sets a long-stay and short-stay cycle standard for new development. However, there is no prescribed standards for a special needs school. Based on the existing school travel mode, there are 4 percent of staff who arrived at school by bicycle and no pupils arrived at the school by bicycle. The proposal would provide 13 cycle storage spaces from the outset, of which, 11 spaces would be long-stay and 2 spaces would be short stay. As such, it is considered that the provision of cycle storage would be adequate to accommodate the current need. In line with the objectives of the London Plan Policy and the submitted School Travel plan, it is considered that cycling should be encouraged and promoted and the level of provision should be monitored during the lifetime of the development.

- **Traffic conditions**

6.4.19 Objections from residents have raised concerns in respect of the timing of the traffic surveys, which were carried out during the lock down and in December 2020. They raise concerns that the proposal would significantly increase the traffic congestion in the area. The Council's Highway officers has advised that the traffic surveys were carried out in Slades Drive, Belmont Lane and Edgebury in September 2020 and between the 11th and 17th December 2020. It is noted that the surveys are carried out during the lock down. However, the traffic flows as indicated in the Transport Assessment were increased by 5.5 percent to take account of this. Turning count surveys were also carried out at the junctions of Green Lane / Belmont Road and Green Lane / Edgebury. Edgebury Primary School has confirmed that the school was opened for the whole month of September in 2020 and between 11th and 17th December 2020. The attendance rate between 11th and 17th December 2020 was approximately 85 percent and is of typical attendance. As such, it is considered that the survey timing and period is considered acceptable.

Trip Generation

6.4.20 The number of pupil and staff attending the proposed site would be the same as the existing. The Transport Assessment indicates that the proposal would result in an increase in traffic on Slades Drive, Belmont Land and Edgebury. Whilst the modelling data in the Transport Assessment indicates that the proposal would not have a significant adverse impact in terms of traffic and the net increase of vehicles per minute would be between 0.3 car to 1.8 car during the school run hours in the morning and afternoon, the Council's highway officers has advised that the two main highway impacts are likely to be on Belmont Lane and at Edgebury Primary School. Belmont Lane, particularly the end nearest Green Lane, has parking on both sides which reduces the road to one way working with gaps left for crossovers and a section of yellow line used as passing places. It is also a bus route.

6.4.21 The applicant has advised that the school is open between 07:00 to 18:00. The arrival and departure of pupils and staff are spread out during the morning and afternoon school run hours. The existing staff travel patters are as follows:

- Arrival times
 - 65% of staff arrive between 07:00 and 08:00; and
 - 35% of staff arrive between 08:00 and 09:00.

- Departure Times
 - 30% of staff depart between 15:00 and 16:00
 - 21% of staff depart between 16:00 and 17:00; and
 - 49% of staff depart between 17:00 and 18:00

6.4.22 The school day is between 08:35am to 15:15pm. Students are expected to arrive between 08:15 and 9:15 and depart between 14:45 to 15:45. It should be noted that the majority of pupils travel by minibus, instead of car. The minibuses have a set time agreed with the school for dropping off their students and so they will be arriving in advance of their drop-off time. The Council's highway officer has considered that the flows are spread out over a number of hours and may be more of an inconvenience than a highway safety issue. A similar scenario occurs currently in Hawkwood Lane with Coopers School. No accidents have been recorded in Hawkwood Lane since 2013. The two issues are not thought to be so significant as to raise an objection on safety grounds to the proposal as set out in the application with the Slades Drive access.

6.4.23 Officers consider that any major school activities that may attract additional traffic to and from the school such as parents evening, sports and Christmas activities should be staggered to prevent traffic build up at the same time and on the same day as Edgebury Primary School. This should be covered in a School Travel Plan, to be secured by condition.

Construction, servicing, and deliveries

6.4.24 The construction access will be via the proposed permanent access in Slades Drive. A detailed construction plan will be required if permission is granted. The size of any construction vehicles, access route and delivery timing must be specific and avoiding any peak hours. The phasing and details of the widening working on Slades Drive connecting to the proposed access road as specify in the transport assessment should be provided and subject to s278 highway agreement in relation to the widening of the access on Slades Drive.

6.4.25 Overall, it is considered that the proposal would have limited impact on traffic conditions in the area during the school run hours. However, the proposal is designed to ensure adequate access, parking and mini-bus provision can be provided for the pupils. Subject to the planning conditions and the required s278 highway agreement, it is considered that the proposal would not significantly impact upon the highway in terms of traffic and highway safety.

6.5 Environmental Health

Contaminated land

6.5.1 BLP policy 118 states where the development of contaminated land or land suspected of being contaminated is proposed, details of site investigations and remediation should be submitted. A main investigation report including the results of boreholes soil sampling and analysis is submitted. The results indicate that there were no potential contamination sources pollutant linkages with any of the sampling. The Council Environment Health was consulted, and no objection is raised

subject to the details of a watching brief be submitted and approved by the Council.

Noise

- 6.5.2 Objection is raised regarding the noise impact assessment which relates to the impact of the school instead of the surrounding residents. A Noise Impact Assessment has been prepared in support of the proposed development. This measured and assessed the impact of future noise levels on the School Building and outdoor space with particular reference to Building Bulletin 93. It also measured the impact from Building Plant to surrounding sensitive receptors, using the assessment methodology in the British Standard 4142:2014.
- 6.5.3 Noise measurements were carried out at the site. The Council's Environmental Health Department was consulted and advise that the assessment for internal noise levels within the school are not relevant in considering the potential disturbance and nuisance to the residents in close proximity to the school. However, the report has identified that the internal criteria will be met with the façade build up and the use of mechanical ventilation within the school rooms. A plant noise limit level has also been set at the teaching room façade to protect the internal environment from this additional noise source. The report has assessed the impact of the plant to the nearest residential property based on the on-site noise measurement. Although the measurement period is not for the length normally accepted, given this location has the lowest background LA90 as 38dBA it is considered to be representative of worse case at the nearest residential property. The plant noise limit has been set at 28dB LAr,T which meets the requirements in the Bromley Local Plan Policy 19. This limit would need to be conditioned to daytime hours only. The details of any external plant to be installed associated to the school should also be secured by planning condition.
- 6.5.4 The Council's Environmental Health consider that the location of MUGA and playing field being located towards to the north of the site away from the residential properties is accepted in principle. The applicant is advised to the consider the the Sport England's artificial grass pitch Acoustic guidance in selecting any fixtures associated to the MUGA. Subject to the condition and informative, it is considered that the proposal would be acceptable

Air quality

- 6.5.5 An air quality assessment is submitted which provides an assessment based on the potential impacts of existing and future traffic levels on the proposed development site and the air quality implications for traffic generation from the development to surrounding sensitive receptors. The pollutants modelled as part of this assessment are nitrogen oxides (NOx) and particulate matter (PM10). The report followed the verification

process as described in the Technical Guidance (LAQM.TG16), to improve the confidence in the model predictions.

- 6.5.6 The modelled assessment and the impact description from the proposed development on air quality at all the nearby sensitive receptors for Nitrogen Dioxide (NO₂) and PM₁₀ is 'Negligible' according to the EPUK IAQM Guidance. All modelled proposed development receptors and existing receptors are predicted to be below the Air Quality Objectives for NO₂ and PM₁₀ in both the Future Baseline (2022) and the Future Baseline + Development Flows (2022) scenarios.
- 6.5.7 The hourly mean concentrations cannot accurately be calculated directly from the modelling however the report has, based on evidence, indicated that the hourly NO₂ objective is unlikely to be exceeded at a roadside location where the annual mean NO₂ concentration is less than 60 µg/m³ and given the modelled receptors are well below this the likelihood of the short-term objective for NO₂ being exceeded is considered low.

Pollutions during construction

- 6.5.8 A Construction & Environmental Management plan is submitted which considered general noise, vibration and dust measures for controlling the impact from the works along with ensuring effective engagement/communication with the local residents prior to and during the works. The Council's Environment Health team have advised that the report has committed to creating a Local Impact & Nuisance Management Plan for some of the sub-contract packages to tailor measures specific to each element of work and will use guidance from BS 5228 'Noise Control on Construction and Demolition Sites' as the best practice guideline. A surface mounted wheel wash is proposed to be installed to undertake the cleaning requirements for all vehicles to reduce the mud on surrounding roads. The report has committed to noise and dust monitoring in assisting the management of impacts from the site. *The report also included details for meeting the Non-Road Mobile Machinery (NRMM) requirements, which should also be conditioned (see below). However, this document should provide more detail in relation to their complaint procedure and confirmation of the construction hours. A updated construction management plan in line of the following guidance should be secured by a planning condition:*

- Control of Pollution and Noise from Demolition and Construction Sites Code of Practice 2017';
- 'The Control of Dust and Emissions During Construction and Demolition Supplementary Planning Guidance, Mayor of London, 2014'
- Guidance on the assessment of dust from demolition and construction' Institute of Air Quality Management (<https://iaqm.co.uk/>)

- Guidance on Monitoring in the Vicinity of Demolition and Construction Sites' (<https://iaqm.co.uk/>)
- 'London Good Practice Guide: Noise & Vibration Control for Demolition and Construction' CIEH guidance document: <https://www.cieh.org/media/1251/london-good-practice-guide-noise-vibration-control-for-demolition-and-construction.pdf>

6.6 Trees - Acceptable

- 6.6.1 Bromley Local Plan Policy 73 states proposal will be required to take particular account of existing trees on the site and on the adjoining land, which in the interests of visual amenity and/or wildlife habitat are considered desirable to be retained. The application is accompanied with an arboricultural impact assessment and arboricultural method statement.
- 6.6.2 The application site is not located within a conservation area and there are no trees with a preservation order that would be affected by this proposal. The site has a fair tree coverage, consisting of mostly self-seeded scrub and trees which are mostly replaceable with mitigation planting. The open field and the residential gardens also have a good degree of tree coverage that adds to the arboricultural value and landscape character to the site.
- 6.6.3 There are a total of 33 trees and 6 groups located within the application site and the adjoining open field to the west and north. The conditions and species of these trees are surveyed.
- 6.6.4 The report indicates that T7 within the application site is an exceptional veteran quality tree which offers good arboriculture values and should be incorporated within the design of the proposal. This tree would be retained within the site and is located in excess of 60 metres away from the proposed building.
- 6.6.5 T33 – Willow (Category B) is also located within the application site and is of good value due to its early mature age. There are category A and B Common oak trees located outside the application site. These trees offer important landscape and arboricultural value.
- 6.6.6 A total of 3 trees and 6 tree groups would be removed as a result of the proposal. The condition and species of these trees/groups are as follows:
- Tree
 - T01 – Common Hawthorn (Category C)
 - T02 – Common Hawthorn (Category C)
 - T033 Goat Willow (Category B)
 - Group
 - G01 Common Hawthorn (Category C)

- G02 Common Hawthorn (Category C)
- G03 Leyland cypress (Category C)
- G04 Common Hawthorn (Category C)
- G05 Common Hawthorn (Category C)
- G06 Mixed Species (Category C)

6.6.7 The Council's tree officers have raised no objection to the proposal and considered that a degree of tree protection has been demonstrated in the applications supporting documents. The proposal would appear to retain a number of existing tree features. Conditional permission is obtainable, subject to more detail on landscaping and arboricultural precautions/method statement. Should planning permission be granted, the following conditions are recommended:

PC02,
PC03
AG01

6.7 Biodiversity - Acceptable

6.7.1 The NPPF states that planning policies and decisions should contribute to and enhance the natural and local environment. Para 175 states that the following principles should apply in determining planning applications:

- a) If significant harm to biodiversity resulting from development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁵⁸ and a suitable compensation strategy exists; and
- d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.

6.7.2 Policy 72 of the Local Plan 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)

6.7.3 A Preliminary Ecological Appraisal dated January 2021 was submitted with the application which consider the impact of the proposal upon the habitat and protected species of the site. The site is not located within or adjacent to any statutory protected site (Site of Special Scientific Interest, Nature Conservation Sites or regionally important geological Site). Belmont Pasture is located approximate 380 metres east from the site. Scadbury Park Local Nature Reserve is located approximately 1.8 km south east from the site. Elmsted Pit SSSI is located approximately 1.9km south west from the site. There is no priority habitat within or directly adjacent to the site.

6.7.4 Field surveys including a round level bat roost assessment of trees on site was undertaken on the 2nd October 2019 and updated on the 29th September 2020 by a bat licenced surveyor. The site contains the following habitat and the values as follow:

Habitat	Value
species-poor semi-improved grassland	The pasture to the west of the stable block is more diverse, with forbs far more prevalent throughout the sward. Locally abundant knapweed (<i>Centaura nigra</i>) and birdsfoot trefoil is present along with areas of mallow (<i>Malvus sylvestris</i>), yarrow (<i>Archillea millefolium</i>), ox-eye daisy (<i>Leucanthemum vulgare</i>), meadow vetchling (<i>Lathyrus pratensis</i>) and hoary cinquefoil (<i>Potentilla argentia</i>). Grasses present include cats tail (<i>Phleum bertolonii</i>), creeping bent, false oat and perennial rye grass (<i>Lolium perenne</i>). Some species typical of improved pasture were also present including creeping thistle (<i>Circium arvense</i>), nettle (<i>Urtica dioica</i>) and ragwort (<i>Senecio jacobea</i>). This habitat is considered to be of site / local value.
Ephemeral / Short Perennial	Vegetation to the gateways is formed of species typical of disturbed ground including fat hen (<i>Chenopodium album</i>), knot-grass (<i>Persicum sp.</i>), scentless mayweed (<i>Tripleurospermum inodorum</i>), bittercress (<i>Cardamine hirsuta</i>) and broadleaf plantain (<i>Plantago major</i>). These small areas of habitat are of negligible value.
Tall Ruderal	Stands of common nettle dominate areas of the site, particularly to the margins of the stables and driveway. This habitat is of negligible / site value
Dense Scrub	Dense bramble scrub (<i>Rubus fruticosus</i>) lines the southern boundary of the site with further small areas of dense bramble to the north and west of the stable block. The small section of fenced land through which the proposed footpath link will run is dominated by bramble, elder (<i>Sambucas nigra</i>), dog rose (<i>Rosa canina</i>) and Virginia creeper (<i>Parthenocissus quinquefolia</i>) which

	forms a mass of vegetation. Scrub is considered to be an important habitat within the local area as listed on the Bromley Biodiversity Plan 2015-2020, however due to the limited extent of this habitat on site it is of no more than this site value.
Scattered Scrub	Scattered stands of hawthorn (<i>Crataegus monogyna</i>) are present within the grassland, most frequently to the western section of the site area. A line of scatted scrub which extends south from the stables is likely part of a defunct hedgerow. This habitat is of site value.
Scattered Trees	<p>Several large, mature oak trees (<i>Quercus robur</i>) are located within or immediately adjacent to the site area. Many of these oak trees are of a size, age and character which would classify them as veteran. These trees are of local / district value.</p> <p>A number of small trees are present to the boundaries of the site, including birch (<i>Betula pubescens</i>), horse chestnut (<i>Aesculus hippocasanatum</i>), ash (<i>Fraxinus excelsior</i>) and willow (<i>Salix</i> sp.); these trees are largely semi-mature specimens of site value. A line of leyland cypress trees (<i>Cupressus x laylandii</i>) exist to the south of the stable block; these trees are of negligible value.</p>
Intact Hedgerow	A native, species-rich hedgerow runs between fields to the northern section of the wider site, beyond the zone of influence of this development. The hedgerow is formed of native species with emergent trees and is considered to be of local value in the context of the urban environment.
Amenity Grassland	A narrow strip of well-maintained lawn lies adjacent Edgebury, along the route of the proposed footpath link. Forbs were typical lawn species including dandelion (<i>Taraxacum officinale</i>), yarrow, ribwort plantain (<i>Plantago lanceolata</i>) and cats ear. This habitat is of negligible value.
Hard / Bare Ground	A surfaced driveway provides access from Slades Drive to the north while concrete hardstanding surrounds the stables. This habitat is of negligible value.
Existing Building	A number of stables, arranged onto 2no. blocks are present to the north-western corner of the site. The stables are disused and in a poor state of repair with many missing roofs, sections of wall or doors. A collapsed corrugated lean-to is also present to the north of the stables. This habitat is of negligible value.

Amphibians

6.7.5 Desk Study indicates that there are 34 records of great crest newts (GCN) within 2km of site and the nearest one is located 1.3km from the site. The site assessment indicates that it is dominated by un-maintained

grassland and scattered scrub which may provide suitable terrestrial habitat for amphibians. The value of the site is negated however by the absence of waterbodies within 500m which could provide breeding opportunities for GCN and other amphibians. Due to the lack of surrounding ponds, the site is considered to be of negligible value to amphibians.

Reptiles

- 6.7.6 Desk study shows there are records of slow worm, grass snake and common lizard existing within 2.0km of the site. The site assessment indicates that the un-maintained grassland and scrub found within the site offers optimal habitat for widespread reptile species such as slow worm and common lizard. The suitability of the site is however reduced by its isolation within the urban environment and previous intensive grazing. The site offers no habitat suitability for rare reptile species such as smooth snake or sand lizard.

Bats

- 6.7.7 Desk study shows 8 bat species have been recorded within 2.0km including Common pipistrelle (*Pipistrellus pipistrellus*); soprano pipistrelle (*Pipistrellus pygmaeus*), Nathusius pipistrelle (*Pipistrellus nathusii*); noctule (*Nyctalus noctula*), leislers (*Nyctalus leisleri*); serotine (*Eptesicus serotinus*); brown long-eared bat (*Plecotus auritus*), and daubentons (*Myotis daubentonii*).
- 6.7.8 The buildings on site were thoroughly inspected and found to be of single-skin wooden construction with corrugated roofs which is generally unsuitable for bat roosting. The suitability of the building was further negated by their poor condition, with many roofs, wall and doors damaged or missing, which resulted in a light, draughty environment. No evidence of bats was recorded anywhere within these buildings during the survey. The existing buildings / structures on site are therefore considered to offer negligible bat roost suitability.
- 6.7.9 Ground-level bat assessment indicates that six trees were identified within or adjacent to the site as offering some level of bat roost suitability. Five trees (T02 to T06) are located outside the proposed construction zone and would be retained and protected. A climb and inspect survey was carried out which indicates that tree (T01) has no direct evidence of bats was found. The bat roost suitability is considered to the low/moderate.

Dormouse

- 6.7.10 Desk study indicates that there are no records of dormice within 2km of the site. Site assessment indicates that the bramble scrub may provide some suitable dormouse habitat. However, this is completely negated by the isolation of the site from suitable areas of dormouse habitat and lack

of records of this species in the vicinity of the site. The proposed construction zone is of negligible value to this species and dormice will be considered no further.

Hedgehog

6.7.11 Desk Study indicates that there are 52 records of hedge hog and the nearest is located 0.3km north west from the site in 2017. The site assessment indicates that the scrub within the site may provide suitable habitat for hedgehog shelter and hibernation while the grassland presents opportunities for foraging. Given the relatively small size of the proposed construction zone and the overall green space surrounding the site, the site is considered to be of no more than site value to hedgehogs.

Badger

6.7.12 Desk study indicates that there are no records of badger. However, they are likely to be present in the wider landscape. Site assessment indicates that there are no evidence of badger such as setts, snuffle holes, latrines, tracks, prints or push-under were recorded during the site survey. The site is therefore considered to be of negligible value to badgers.

Birds

6.7.13 Desk study indicates that there are 61 species of Birds of Conservation Concern (BoCC) that have been recorded within 2.0km of the site, including Schedule 1 species such as woodlark (*Lullula arborea*), firecrest (*Regulus ignicapilla*) and red kite (*Milvus milvus*). Site assessment indicates that the site contains trees, scrub and rough grassland which could support foraging and nesting by common bird species. Given the urban surroundings of the site, it is considered highly unlikely to support any Schedule 1 bird species. The proposed development site contains a comparatively lower percentage cover of scrub and mature trees than the immediately adjacent land to the north and west, therefore the site is considered to be of no more than site value to breeding and foraging birds.

Invertebrates

6.7.14 Desk Study shows there is small number of records of notable invertebrate species including 245 occurrences of stag beetle *Lucanus cervus*, the nearest record being 123m south-west. Brown Argus butterfly, a local species of conservation concern, has also been recorded within 2.0km.

6.7.15 Site assessment indicates that the small areas of deadwood found beneath oak trees may support small numbers of stag beetles. Given that the site lacks good amounts of larval foodplants favoured by the brown argus butterfly such as rock rose, doves-foot cranes bill or

common stalks-bill, the site is therefore of negligible value to this species. The semi-improved grassland contains flowering species which may support a range of invertebrate species. However, the species-poor grassland which dominates the proposed construction zone is of low value to invertebrates.

6.7.16 Natural England as a non-statutory consultee was consulted and has advised that no comment and no assessment to make in respect of this planning application. Natural England has published a standing advice and should be used to assess the impact on the proposed spaces in line with the ecology services for advice. Natural England and the Forestry Commission have also published standing advice on ancient woodland and veteran tree and this should be used to assess any impact on ancient woodland. The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes.

6.7.17 The proposal is assessed in line with the standing advice and guidance on veteran trees. The proposal would incorporate biodiversity mitigations and enhancement measures to compensate and enhance the biodiversity value of the site and protection of protected species. The following mitigation measures would be provided and secured by planning conditions

- All retained trees including tree works will be protected in accordance with BS5837:2012 during the construction phase.
- Vegetation within the construction zone shall be cut by rotary mower set to a height no less than 1500mm above ground. The vegetation shall be cut from south to north to encourage any reptile present to naturally disperse into the adjacent habitat. The works shall then be subject to a fingertip search by a qualified and competent ecologist with any reptiles encountered safely moved to areas of retained habitat to the north or west of the proposed site. Once the area has been declared free of reptiles, a final cut shall reduce vegetation to
- Any areas of debris, rubble or logs within the proposed construction zone shall be removed by hand under ecological supervision. Any reptiles found shall be caught by hand and released into adjacent retained habitat.
- All clearance works of grassland shall take place outside the hibernation season (e.g. timed between mid-March – September) and in suitable weather conditions (9+ degree C, dry, sunny). Initial clearance shall be timed to avoid the early morning or late afternoon when reptiles may be less active and unable to move away from harm.
- Areas of scrub which require removal shall be cut to no less than 150mm above ground outside the bird nesting season (e.g. avoiding March – August), or following inspection by an ecologist where this is not possible. The removal of stumps and roosts shall then be undertaken during the reptile active season.

- Existing boundary vegetation including trees and scrub shall be retained within the scheme. Where removal is unavoidable, this loss shall be compensated by new hedgerow planting within the site and creation of a 7.0m wide buffer of native planting between the school and residential dwellings to the south. The loss of foraging within areas of species-poor semi-improved grassland shall be compensated through the creation of areas of wildflower meadow, native tree planting and pond creation to the east of the site, with flowering lawn mix utilised in areas subject to regular mowing.
- Lighting across the site shall be designed in accordance with BCT & IPL Guidance Note 08 / 18 – Bats and Artificial Lighting in the UK. All light spill upon the retained oak trees and boundary vegetation shall be avoided.
- Staggered vegetation clearance as proposed for the protection of reptiles shall also protect any hedgehogs which may be found within the site. Any hedgehogs encountered shall be safely moved to an area of retained scrub to the north of the site.
- The secure boundary fence shall include a hedgehog access gap of 13x13cm to each aspect of the fencing to allow movement of hedgehogs between the site and the wider environment. A hedgehog house shall be installed within the 7.0m buffer.
- Any trenches deeper than 1.0cm shall be back filled or covered each night. Where this is not possible a ramp should be installed to allow any trapped animals to escape. Drainage pipework greater than 200mm diameter should be capped over night to prevent mammals seeking shelter in these areas. Should any animal be found trapped on site, a suitably qualified ecologist should be contacted for advice.
- Clearance of any scrub or trees will be undertaken outside the bird nesting season (season: March-August inclusive). Should this not be possible, vegetation will be checked prior to removal by a Suitably Qualified Ecologist.

6.7.17 The following enhancement measures are proposed and would be secured by planning conditions:

- The use of flowering shrubs as listed within the RHS 'Plants for Pollinators' plant list to provide year-round interest for invertebrates;
- The use of night-scented species and pale flowers to increase bat foraging potential across site;
- The provision of nesting boxes for a variety of bird species (over and above the existing nesting opportunities);
- Increased roost opportunities provided through the installation of bat boxes to the southern aspect of mature trees and integrated roosting space within the new building;
- A wide strip of native planting including native shrubs, trees and wildflower grassland to the southern and western boundaries of the site;
- Installation of log piles to the southern buffer strip and within the forest school section of the site to provide hibernation sites for reptiles and amphibians;

- Installation of 'bug houses' in both sheltered and sunny spots to provide habitat for a range of invertebrate species.
- Areas of increased native shrub and tree planting, particularly to the north-eastern section of the site;
- Native hedgerow planting to the margins of the MUGA, sports pitch; and
- Creation of a wildlife pond to the south-eastern corner of the site.

6.7.18 Should the application be considered acceptable overall, it is considered that the above should be secured by planning conditions including bat and bird boxes.

6.7.19 Subject to the measures being secured by planning conditions, it is considered that the proposal would not result in a significant harm to biodiversity. The existing mature exceptional quality oak tree would be retained and new planting would be introduced to compensate any other loss. The urban green factor indicates that the proposal would achieve a rating score of 0.34. As such, it is considered that the impact of the proposal on biodiversity would be acceptable.

6.7.20 Objections have been raised concerning the timing of the bat survey being carried out during the habitation seasons. The bat surveys were carried out on the 2nd October 2019 and updated on the 29th September 2021 by a licenced bat surveyor. The Bat Surveys for Professional Ecologist – Good practice Guidelines published by Bat Conservation Trust indicates that the UK bat active period is generally considered to be between April and October inclusive. April, September and October Surveys are both weather and location dependent October surveys are generally not acceptable in Scotland. The bat survey was carried out at the beginning of October and the site is not northerly latitudes located. It is considered that the timing of the bat survey is acceptable.

6.8 Drainage and flooding - Acceptable

6.8.1 The NPPF states that major development should incorporate sustainable drainage systems which should take account of advice from the lead flood authority; have appropriate proposed minimum operational standards; have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and where possible, provide multifunctional benefits. London Plan Policy SI-13 and BLP Policy 116 states development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.

6.8.2 The application site is located within Flood Zone 1 and is not subject to surface water flooding. The Environment Agency map indicates that the houses on Brownspring Drive and the houses near to Edgebury Primary School on Edgebury are subject to low to medium surface water flooding. The surrounding highway network on Edgebury, Brownspring and Slades Drive are subjected to low to high surface water risk.

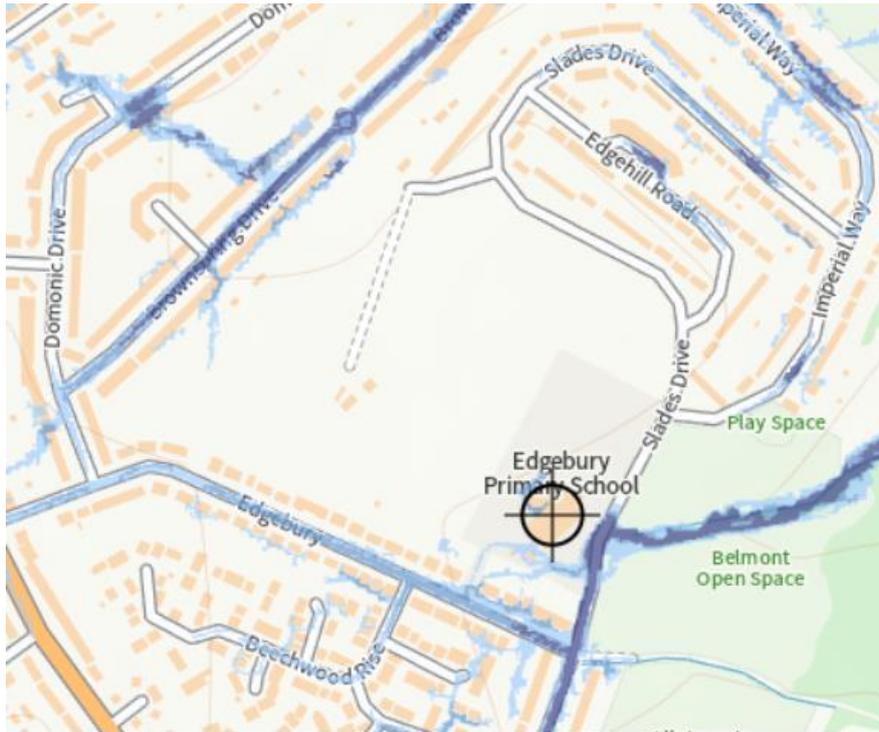


Fig 5. Environment Agency Surfacing water flood risk map

6.8.3 Objections have been received regarding increased surface water flooding and references made regarding to spring water and water streams along the existing track. The Environment Agency map indicates that there are no water courses running within the site. The proposed development will result in a net increase of impermeable area which measures approximately 1.34 ha, approximately 57 percent of the overall site. A surface water drainage strategy has been designed in line with the most recent Environment Agency Climate Change Guidance to consider and manage the impact of a 1 in 100 year plus 40% climate change rainfall.

6.8.4 The surface water will be managed within the site and therefore prevent potential exceedance flows off-site. The proposed surface water discharge rate will be restricted to 5.4 litre /second for all storm events with the use of hydro break prior to its connection onto the existing Thames Water surface water sewer. The proposed surface water drainage strategy and measures are as follow:

- Permeable Pavement

Permeable paving measures approximately 1,298sq.m would be provided for the car parking areas and is designed to attenuate runoff from paved areas. The attenuated volume from the permeable paving will pass through the same hydro-brake that was stated above to restrict the flows that the public sewer will receive.

- Geo-cellular Storage

Two Geo-cellular storage tanks (measures 54 x 5 x 0.8m and 46 x 5 x 0.8m) would be installed under the parking bays to the east of the site. Flows from the geo-cellular tanks will be restricted by a hydrobrake and will be discharged to the public sewer via a piped network.

- Detention Basin

The proposed basin will cover an area of approximately 811sq.m and it will have a depth of 1.17m. The minimum slope of its sides will be 1 in 3 and the total attenuation volume that will be able to provide is approximately 718m³. The proposed detention basin will attenuate the majority of the surface water runoff from the proposed development prior discharge to the public sewer.

- Filter Drain

The proposed filter drain will collect surface water runoff from the eastern part of the yard of the proposed building and will transfer it to the detention basin. The proposed filter drain will be 0.8m deep, 0.6m wide and will also incorporate a 300mm diameter perforated pipe.

The peak flow rates off site will be restricted using a Hydrobrake or a similar control system to greenfield runoff rates (QBAR) prior discharging to the Thames Water public sewer on Slades Drive, approximately 120m to the east of the proposed development.

6.8.5 The Council's Drainage Officer and Thames Water were consulted, and no objections are received in respect of the proposed surface water drainage strategy and measures subject to the details design and the measures as outline above and contained with the submitted report be secured by planning condition.

6.9 Energy - Acceptable

6.9.1 Paragraph 153 of the NPPF states that in determining planning applications, LPAs should expect new developments to comply with policies and requirements for decentralised energy supply unless this is demonstrated to not be feasible or viable.

6.9.2 BLP Policy 124 and London Plan Policy SI 2 requires major development should be net zero- carbon, reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the energy hierarchy 1) Be Lean: use less energy and manage demand during operation; 2) Be Clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly; 3) Be Green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site; 4) Be Seen: monitor, verify and report on energy performance.

6.9.3 London Plan requires a net zero-carbon target for all new major developments with at least a 35% on-site reduction beyond Part L 2013 of the Building Regulations. Under the Be Lean measures, non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on site, any short fall should be provided in agreement with the borough, either:

- 1) Though a cash in lieu contribution to the borough's carbon offset fund or
- 2) Off-site provided that an alternative proposal is identified, and delivery is certain.

6.9.4 An Energy Assessment following the GLA's energy hierarchy has been received and this has been reviewed by the Council's Energy officer. Under the "Be Lean" category, a range of passive design features to minimise the energy consumption through passive design fabric performance and energy efficiency. These measures would meet the minimum 15 percent requirement as outlined in the GLA energy guidance and this is considered acceptable.

6.9.5 As there is no district network in the area, it is not possible to achieve any carbon reduction under the "Be Clean" category at the present time and no carbon reduction can be awarded under this category.

6.9.6 Under "Be Green" category, a range of on-site renewable energy technologies. It is considered that the use of air source heat pumps and solar photovoltaic (PV) would be the most feasible option for this site and would be used to generate on-site renewable energy and achieve the required carbon reduction.

6.9.7 The overall results indicate the proposal would achieve 62 percent regulated carbon saving (23 tCO₂/year) against Part L 2013 of the Building Regulations. The breakdown and required planning obligations as follow:

- On site regulated carbon dioxide emissions (Building Regs 2013 Compliant Development) = 37 tCO₂ per annum
- Proposed on site reduction of carbon emissions from energy demand/CHP/renewables = 22 tCO₂ per annum
- On site shortfall = 14 tCO₂ per annum
- **Payment-in-lieu** amount calculated as 14 (tCO₂) x £95 (per tCO₂) x 30 (years) = **£39,900**

6.9.8 The Council's Energy officer has been consulted and no objection is raised to the proposal and recommended the total carbon offsetting payment of £39,900 will be secured by a legal agreement. A condition is recommended to secure the carbon saving measures as set out in the energy statement can be delivered.

7. Planning Obligations and CIL

CIL

7.1 The Mayor of London's CIL is a material consideration and the application is liable to the Mayor CIL.

7.2 The Council's has published a draft charging schedule. Following the examiner's report on the draft charging schedule and formal approval by Full Council, the Bromley Local CIL will be adopted on the 15th June 2021 and will apply to any development determined on or after 15th June 2021. CIL payments will also replace some contributions outlined below such as health and education after this date.

Heads of Terms

7.3 The following planning obligations will need to be secured as part of an S106 legal agreement, which the applicant has agreed to in principle, should permission be granted:

- Carbon offsetting – £59,900
- S278 Highway Agreement

8. Conclusion

8.1 The principle to provide a new school at this allocated site is supported The proposal would not result in loss of an existing school facilities in the area and would ensure adequate internal and external teaching and learning environment can be provided for the teachers and pupils.

8.2 The siting, scale and massing of the proposed building is design ensure adequate outlook and privacy can be maintained. The proposal would increase the level of traffic in the local area. However, it should be noted that the majority of the pupils attending the site would be via minibus and the travel patten is different from a typical school.

8.3 The development is considered acceptable from a sustainability, air quality and environmental health perspective. Subject to the planning conditions, s106 legal agreement and s278 highway agreement, it is considered that the benefits of the proposal would outweigh any harmful impacts arising from this proposal and planning permission should be granted.

RECOMMENDATION: PERMISSION SUBJECT TO S106 LEGAL AGREEMENT AND PLANNING CONDITIONS

SUMMARY OF CONDITIONS AND INFORMATIVES

- **Standard condition**
 - Time limit of 3 years
 - Drawing number

- **pre- commencement**
 - Slab levels
 - Stage 2 Road Safety Audit
 - Construction management plan
 - Surface water drainage
 - Ecological mitigation and enchantment plan
 - Hardstanding for wash down facilities
 - Land contamination

- **Prior to above ground works**
 - Details of external materials
 - Hard and soft landscaping including boundary treatment, access gates and planting schedule
 - electric charging points
 - External lighting
 - Secured by Design
 - Serving and delivery plan
 - Arboriculture site supervision
 - External plant noise

- **Prior to occupation**
 - Stage 3 Road Safety report
 - School Travel Plan
 - Energy Statement

- **Compliance conditions**
 - Parking
 - Cycle
 - Arboricultural Report
 - Event/activities co-ordination with Edgebury primary school
 - Non-Road Mobile Machinery:

Informative

1. Thames Water
2. Highway
3. Environment Health
4. Secured by Design