

Capel Manor College

28 March 2022

Local Planning Authority: Bromley

Local Planning Authority reference: 21/05812/FULL1

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Partial redevelopment of site including the demolition of three existing buildings; erection of two new College buildings, landscaping and associated works within MOL.

The applicant

The applicant is **Capel Manor College** and the architect is **Feilden Fowles Architects**.

Strategic issues summary

Land use principles: Educational use is supported. Although the development is considered inappropriate development on MOL, as it does not satisfy any of the exception tests in paragraph 149 of the NPPF, the applicant has demonstrated very special circumstances in regard to the need for specialist college and that there are no alternative sites that are sequentially preferential. The principle of the reconfiguration of the college site in MOL is therefore supported. (Paragraphs 16 to 44).

Urban Design: The approach to layout, scale and massing, architecture and inclusive design is generally supported. Further details are required in relation to siting of the Welcome Block, and an amended Fire Statement is required. (Paragraphs 45 – 52).

Transport: The scheme does not comply with London Plan policy in relation to parking. An Active Travel Zone Assessment should be undertaken. No information has been provided in relation to servicing and deliveries. Further detail is also required in relation to drop off area, cycle parking, disabled parking, trip generation and pedestrian / cycling routes to the site. The scheme will also be required to contribute towards bus shelter upgrades. (Paragraphs 53 – 67).

Sustainable Development: Further information is required in relation to energy, whole life carbon and circular economy. No information has been submitted in relation to digital connectivity. Paragraphs 68 – 73.

Environmental Issues: The approach to flooding accepted. The urban greening factor has been incorrectly calculated. Further information is required in relation to the SINC, trees, drainage, water efficiency and air quality. Paragraphs 74 – 94.

Recommendation

That Bromley Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 98. Possible remedies set out in this report could address these deficiencies. The Mayor does not need to be consulted again if the borough decides to refuse the application.

Context

1. On 08 February 2022 the Mayor of London received documents from Bromley Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following Category of the Schedule to the Order 2008:
 - 3D Development on green belt or Metropolitan Open Land within the adopted or emerging development plan
3. Once Bromley Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; or, allow the Council to determine it itself. In this case, the Council need not refer the application back to the Mayor if it resolves to refuse permission.
4. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planning.london.gov.uk/pr/s/>

Site description

5. The 0.36 ha site is located in the north of Bromley and is designated as Metropolitan Open Land The site is owned and operated by Capel Manor College which is London's only specialist environmental college. There are a range of existing structures on site including glasshouses, mobile portacabins, low profile storage and teaching buildings. There is also an area for animal welfare to the south of these structures.
6. The site is screened by existing, dense vegetation on all sides, with the only visible gap at the vehicular access point off Mottingham Lane which runs along its north eastern boundary. Quaggy River is located on the western edge of the site, with the southern boundary shared with open fields and the New Lodge Riding School. On the other side of Quaggy River are the back gardens of the semidetached houses along Jevington Way.
7. A Site of Importance for Nature Conversation is located outside of the red line boundary but within the ownership of the college boundary.
8. The site is not located within a conservation area and there are no listed buildings on site. There is a Grade II listed building within 500m of the College boundary.
9. The site is located within Flood Zone 2.

10. The nearest section of the Transport for London Road Network (TLRN) is approximately 300m away on A20- Sidcup Road. There are four bus stops within reasonable walking distance (640m) of the site, serving two routes. Mottingham Station is outside of reasonable walking distance being approximately 1.6km from the site, providing National Rail services to Central London and Kent. Consequently, the site has a Public Transport Accessibility Level (PTAL) of 1b, on a scale of 1-6.

Details of this proposal

The proposals include:

- Demolition of the existing buildings save for the existing northern glasshouse and one existing store;
- Relocation of a secure store to the southern end of the existing car parking area;
- Erection of two new buildings:
 - The Welcome Block to accommodate public facing teaching space, including classrooms for dog grooming, exotic animals and floristry;
 - The Linear Block which includes a teaching and social space;
- Provision of a courtyard in the centre of the built development on site that will be utilised for outdoor teaching, student break out space and community events.

Case history

11. The site has the following planning history:

- 1985 Ref 85/00881/FUL - The site was formally used as a Garden.
- 1996 Ref 95/01754/FULMAJ Permission was granted for the use of the site for horticultural training and retail trading by Hadlow College
- 2003 Ref 02/03610/FULL1 - An application was granted for the demolition of the existing toilet block and erection of five single storey buildings containing a classroom building, reception building, common room building, female toilet block, and replacement male and disabled toilet block in connection with existing use of site as a training and educational establishment.

12. There has been one pre application meeting with the Council in August 2020 and an “in principle” pre application meeting with GLA officers in May 2021.

Strategic planning issues and relevant policies and guidance

13. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the London Borough of Bromley Local Plan 2019 and the London Plan 2021.

14. The following are also relevant material considerations:

- The National Planning Policy Framework and National Planning Practice Guidance;
- DCLG Policy Statement Planning for Schools Development 2011
- Local Plan Review – Call for Sites August 2021

15. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:

Good Growth	London Plan
MOL	London Plan
Educational Facilities	London Plan; Social Infrastructure SPG
Urban design	London Plan; Character and Context SPG; Public London Charter draft LPG;
Heritage	London Plan
Inclusive access	London Plan; Accessible London: achieving an inclusive environment SPG
Sustainable development	London Plan; Circular Economy Statements draft LPG; Whole-life Carbon Assessments draft LPG; 'Be Seen' Energy Monitoring Guidance draft LPG; Mayor's Environment Strategy;
Air quality	London Plan; Draft Air Quality Positive LPG; the Mayor's Environment Strategy; Control of dust and emissions during construction and demolition SPG;

Transport and parking

London Plan; the Mayor's Environment Strategy; Mayor's Transport Strategy; Draft Sustainable Transport and Walking LPG

Biodiversity

London Plan; the Mayor's Environment Strategy

Land use principles

Educational facilities

16. Paragraph 95 of the NPPF states that planning authorities should take a proactive, positive and collaborative approach to ensuring a sufficient choice of school places, giving great weight to the need to create, expand or alter schools. London Plan Policy SI 3 seeks to ensure a sufficient supply of good quality educational choice to meet the demands of a growing population and enable local communities to access this provision.
17. The proposals seek the demolition of a number of existing buildings that are considered to be unserviceable and inappropriate to the college's operation and curriculum. The application proposals seek the erection of two new buildings, the Welcome Block which will accommodate public facing teaching space, including classrooms for dog grooming, exotic animals and floristry; and the Linear Block which will accommodate teaching and social space. Additionally, the proposed location of the Linear Block enables the provision of a courtyard in the centre of the built development on site that will be utilised for outdoor teaching, student break out space and community events.
18. The proposals seek to increase Capel Manor College's operational capacity and the quality of its educational provision ensuring it can meet the educational need for land-based and environmental courses.
19. However, the new development would be located on MOL and, as below, the development is considered inappropriate development that would (by definition) harm the openness of MOL and purposes of including land within it. As such, notwithstanding the strong support for new education provision within the London Plan, the applicant is required to demonstrate that very special circumstances exist.

Metropolitan Open Land

20. The site lies wholly within land designated as Metropolitan Open Land by the Bromley Core Strategy. London Plan Policy G3 affords Metropolitan Open Land the same status and level of protection as Green Belt; and states that MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt.

21. Paragraph 147 of the NPPF states that inappropriate development, is by definition, harmful to the Green Belt [MOL] and should not be approved except in very special circumstances. The NPPF provides that construction of new buildings should be regarded as inappropriate save for certain limited exceptions set out in paragraph 149. Sub paragraph g) is the most relevant one in this case:

- Limited infilling or the partial or complete redevelopment of previously developed sites; providing
 - a) there would be no greater impact on openness; or
 - b) the development would not cause substantial harm to openness and would contribute towards an identified affordable housing need within the Local Planning Authority's area.

Exception test

22. Of the total site area, 993 sqm are existing buildings/ portacabins and 4,135 sqm is hard standing. The area that can be considered as previously developed land is therefore 5,128 sqm.

23. 439 sqm of the existing buildings will be retained. There will be a reduction in hard standing of 712 sqm with 763 sqm of new buildings proposed. Although there will be an overall increase of 206 sqm of building footprints, combined with the reduction in hard standing means that overall the total area covered by building and hard standing is 4,625 sqm equating to a reduction of 503 sqm overall.

24. As the development would not contribute towards affordable housing, the test therefore is whether or not the proposed development would have a greater impact on the openness of the Green Belt than the existing development.

Impact on openness

25. In considering the impact on openness, the National Planning Practice Guidance (Paragraph: 001 Reference ID: 64-001-20190722) is clear that openness is capable of having both spatial and visual aspects.

26. In spatial terms, as described above, the combined footprint of the proposed buildings and hardstanding is 503 sqm smaller than the existing combined footprint of the buildings and hard standing. It should be noted that although spatially smaller overall, changes in the layout mean that some of the proposed buildings are potentially on green undeveloped MOL, although this is compensated for by some of the hard standing being converted back to green MOL.

27. When considering the visual impacts, the applicant suggests that the site is completely screened from the public areas outside of the site boundary. However, photos from the Design and Access Statement on page 16, from views 1 and 2, suggest there potentially may be some visibility of the proposed development from the site entrance and potentially along Mottingham Lane. No visual impact assessment has been provided in order to make this assessment on openness. The applicant should therefore provide accurate visual assessment showing the proposed development from

views 1 and 2 as well as a different angle from view 1 looking south-east towards the new classroom block.

28. Notwithstanding the above, within the site, the proposed buildings are larger in both footprint and volume than the existing buildings. As such, GLA officers consider that the proposed development is likely to have a greater impact on the openness of the MOL than the existing development. It is acknowledged, however, that the more logical layout and high-quality design is likely to help to integrate the appearance of the buildings within the surrounding context, thereby limiting the scale of the greater harm. The impact needs to be fully demonstrated through submission of further visual impact material.

Impact on purposes of MOL

29. London Plan Policy G3 Part B sets out a number of criteria in relation to MOL designated as MOL:

- 1) it contributes to the physical structure of London by being clearly distinguishable from the built-up area
- 2) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London
- 3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value
- 4) it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.

30. When considering harm to MOL, it is important to consider the extent to which the proposal conflicts with any of these.

31. GLA officers consider that there would be some conflict with purposes 1, 3, and 4 because the reduction in openness, albeit it is only likely to be seen within the site itself. This limited harm to MOL also needs to be weighed in the balance. GLA officers also note however that the proposals improve purpose 2 to some extent by improving public access to the site as well as providing services and events which are open to the public.

Very special circumstances

32. As set out above, there would be harm to the MOL by reason of inappropriate development which causes a greater harm to openness.

33. The applicant has set out a case for very special circumstances, which can broadly be summarised as the need for expansion of London's only specialist environmental college and there being no alternative sequentially preferable sites (i.e. not within Green Belt/ MOL, or on preferable Green Belt/ MOL sites) available for development.

Need for Specialist College

34. Capel Manor is the only college in London that specialises in education and training for the environmental and land-based industries and delivers around 70% of all Government-funded land-based provision in London. The College has six campuses across London, in the following locations:

- Enfield, Bullsmoor Lane
- Enfield, Forty Hall Farm
- Camden and Westminster, The Regent's Park
- Ealing and Hounslow, Gunnersbury Park
- Waltham Forest, Brooks Farm
- Bromley, Crystal Palace Park Farm

35. The College's strategy and curriculum is responding to the emergencies relating to climate change; the loss of biodiversity; and failing food security and the emerging opportunities in the green economy. The College is also working with the GLA and other colleges to develop two new Mayoral Green Skills Academies in both south-east and west London specifically addressing current skills shortages in these areas and future skills needs for the new and emerging economies. Capel Manor College therefore makes an important contribution to both educational need and the local economy within London.

36. In addition to its educational objectives, the College manages gardens, farms, zoos and landscapes most of which are fully open to the public as well as operating businesses and commercial enterprises including events, retail operations, farm shops, plant sales and commercial florists.

37. The current arrangement of the College's campus, in terms of the substandard accommodation and illogical layout, coupled with the requirement to vacate part of the main stand of the National Sports Centre within Crystal Palace Park and consolidate provision across the two sites, means that without the proposed development, the College would be unable to meet its curriculum requirements and address the skills gap within these sectors.

38. Additionally, the proposals not only seek to replace and consolidate the existing ad-hoc form of built development at the site and enhance the MOL setting but will also provide benefits for the local community and local schools in offering public events and services such as plant sales, floristry, aquatics, and dog grooming which is not possible with the current arrangements on site.

39. GLA officers therefore consider that there is a clear need for the expansion and reconfiguration of the specialist college. Paragraph 95a of the NPPF gives great weight to the need to create, expand or alter schools in decisions on applications. Therefore, officers consider that the reconfiguration of the site could represent a very special circumstance, subject to the applicant demonstrating that there are no sequentially preferable sites that could accommodate the College's requirements, as discussed below.

Alternative site assessment

40. The applicant has stated that there are no other suitable sites and has provided an alternative site assessment. Its methodology is based on a number of criteria that meets the College's curriculum and operational requirements, including potential for future enhancement of the curriculum, sustainable population of students within catchment, appropriate distance from other campuses, accessibility, access to expansion green spaces and livestock, conditions of existing buildings, long term tenancy, civic presence and strategic/cultural fit.
41. The alternative sites assessment excluded Central London sites on the basis that they would be unsuitable and unaffordable. 13 sites were assessed, including this site and two options for Crystal Palace Park Farm site which is also owned by the College (existing and proposed based on a current application). All but one of the sites are located within the Green Belt/MOL, which is due to the requirement for expansive outdoor teaching spaces for agriculture, animal management and horticulture courses. The only site not designated as Green Belt or MOL is the Barking Riverside site. However, this site is already earmarked as a proposed site for Capel Manor College in relation to its future expansion.
42. GLA Officers agree with the conclusions of the assessment that this site scores highest in relation to the 15 criteria and is therefore best placed to meet the College's curriculum and operational requirements.
43. Additionally, although not a criterion in the assessment, is the need for the site to be located within close proximity to the College's Crystal Palace Park Farm site which is important for the College's ongoing operation to enable a complementary curriculum split between the two sites. Furthermore, the proposed development at this site means that the proposals for Crystal Palace Park Farm in application 20/00325/OUT can be reduced in scale and therefore be more sensitive to Crystal Place Park Farm's location, constraints, and its smaller operational capacity.

Land Use Principles conclusion

44. GLA officers consider the proposed development to be inappropriate in MOL due to its greater impact on openness, albeit that the design of the scheme means that this greater impact could be limited (subject to further demonstration by the applicant of the extent of the harm).
45. The applicant has however demonstrated there is a need for the proposed reconfiguration of the college to meet its curriculum and operational requirements, which carries significant weight, and that there are no other alternative sequential preferable sites available. Very special circumstances have therefore been demonstrated that could outweigh the harm subject to the further assessment requested.

Urban design

46. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.
47. The approach to the layout appears logical and well considered with a clear sense of arrival. The step free access, flexible use of space and informal and intuitive way finding is supported. In line with Policy D8, free drinking water provision should be considered within areas of communal areas used by the students and /or public realm for general public access.
48. The proposed cross laminated timber construction methodology is supported, along with the general material selection utilising naturally occurring hues that are appropriate for the MOL setting.
49. The scale, height and volume of the proposed built form are larger than existing structures. As discussed above, given the topographic change across the site and the more prominent position of the Welcome building closer to the entrance, the applicant should provide visual assessment showing the proposed development from outside the site in order to allow a full assessment of the impact on the openness.
50. It is also not clear within the documentation, whether the proposed citing of the new Welcome Centre extends into the eastern part of the SINC. This should be clarified. If this is the case, the applicant should explore whether the Welcome Block could be moved slightly further south and whether there is potential to consolidate it with the Linear Teaching Block to reduce the potential impact on the SINC. If this is not possible, the applicant should clearly set out how they have followed the mitigation hierarchy to minimise development impacts in relation to the SINC as per London Plan Policy G6. Further detail is set out in paragraphs 77 and 78.
51. Fairmount Ladies Rest Home Grade II Listed building is located within 500m of the College's outer boundary. It is not anticipated that the proposed development will be seen within the setting of the Listed Building due to the extensive woodland which has a width of up to 80m from the boundary of Mottingham Lane.

Fire safety

52. The application is supported by a Fire Statement which the majority of the issues are addressed. Further details are required in relation to the type of material uses. Whilst it is accepted that not all materials are known, an assessment of the fire safety of the materials outlined in the DAS should be provided. If through further detailed design, these materials change, then the fire statement should be

updated. Reference is also made that no internal escape stairs are protected which requires further discussion with Building Control. This issue should be resolved.

53. A plan should also be provided to demonstrate how fire vehicles can access structures around the site as well as access to water supplies.

Transport

Healthy Streets and Active Travel Zone Assessment

54. All developments proposed should support the Mayor's Healthy Streets approach in line with London Plan Policy T2. In line with TfL guidance, an Active Travel Zone Assessment (ATZ) should be carried out for this site, the scope of which should be agreed with Council and TfL in advance. Once completed, the ATZ should be used to inform further discussions about the appropriate form and extent of mitigation to support achieving a strategic modal shift in line with that outlined in London Plan Policy T1.
55. It is noted that there are no marked or segregated cycle lanes serving the site. Furthermore, on Mottingham Lane there is only one continuous footway on the opposite side of the road to the site, which is narrow and does not have any provision to help pedestrians to cross. This inadequate provision for pedestrians and cyclists should be reviewed and improved alongside the other routes to the site along with the currently shared pedestrian/vehicular access into and within the site.
56. Two of the bus stops within reasonable walking distance on Alnwick Road and Mottingham Lane do not have shelters. Given that buses are the only public transport and the nature and location of the development, it is recommended that a contribution to install bus shelters is secured. This is in line with London Plan Policy T2 'shade and shelter' and Policy T4.
57. The entrance to the site is car-dominated; contrary to Policy T2 Healthy Streets. It is unclear how use by private cars would be prevented from the proposed drop off area to the north of the site intended for the shuttle bus. Furthermore, there are no parking or waiting restrictions in this area. Allowing student drop offs/pick-ups from private vehicles on site and uncontrolled on street parking and waiting will increase car trips and increase road danger, contrary to Policy T2 and the Mayor's Vision Zero approach. It is recommended that car parking is reduced to provide space for a designated shuttle bus and disabled persons pick up/drop off area in the car park, containing the areas of the site which are car dominated and enabling more effective management against unauthorised use.
58. The area currently proposed for drop off/pick-ups could be converted into other ancillary space and improve the balance given to active modes of travel across the site. Any student drop offs/pick-ups on site independent of the shuttle bus or not of disabled people should be prohibited to reduce vehicle trips and reduce road danger. Parking and waiting controls on street should also be introduced and if appropriate a School Street designated.

Cycle Parking

59. 20 cycle parking spaces are being proposed, which is in line with the minimum standards of London Plan Policy T5. Given the use and location more provision is encouraged including for existing staff and students. Cycle Parking should be designed in accordance with the London Cycle Design Standards, which is also a requirement of Policy T5. The plans provided do not show the proposed long-stay cycle parking location or design. A scaled plan of the cycle parking should be provided prior to the determination of this application as design changes may be required.

Car Parking

60. It is welcomed that no general car parking spaces are proposed for student use. However, the existing twenty car parking spaces at this site are to be retained for staff use, which equates to a parking ratio of 0.71. This quantum will not support achieving a strategic modal shift in line with London Plan Policy T1. Therefore, it is recommended that a reduction in car parking is sought and sustainable modes of travel are encouraged.

61. It is noted that there is no CPZ in this location, as such there is a concern that students, staff and visitors will park on the surrounding streets. Policy T2 states that developments should not seek to increase car dominance on London's streets. As such, a contribution towards the implementation of controls should be secured.

62. A plan showing the layout of the car parking should be provided. This should be supported by commentary on the design and management measures that will be implemented to ensure that no informal car parking takes place on site outside this area.

63. No disabled persons' parking spaces are being proposed, which is contrary to Policy T6.1. It is recommended that at least one of the existing car parking spaces is converted into a disabled persons' parking space.

64. In line with Policy T6 at least 20% of the parking spaces should have active electric vehicle charging facilities, with the remainder passive. A higher number of active points is encouraged, particularly in respect to the required disabled persons' parking.

Trip Generation

65. A multi-modal trip generation has been provided, however there is a concern that this underestimates the impact that the proposed development will have on the surrounding transport network. Further detail on these concerns can be found in TfL's detailed comments, but in short, the methodology proposed should be adapted to include actual numbers rather than FTE and more information on the modal split is required. A revised trip generation assessment which addresses the concerns raised should be submitted. Subject to this assessment, a contribution towards sustainable and active travel may be required in line with Policy T4.

Construction, Delivery and Servicing

66. No information surrounding delivery and servicing has been provided. From the site plans, it is unclear where delivery and servicing will occur. To improve the balance of space given to those who walk and cycle, it is recommended that servicing occurs from the car park. Sufficient space for vehicles to enter and exit the car park and the site in forward gear should be provided, in line with the Mayor's Vision Zero approach. Information on the number of servicing trips expected at the site should also be provided. This information should be provided prior to determination.
67. In line with Policy T7, a delivery and servicing plan should be secured through condition. It should detail the measures that will be implemented to mitigate the demand that this activity will have on the surrounding transport network. This should be prepared in line with TfL guidance and provide detail on how the impact on the surrounding transport network will be minimised and adhere to the Mayor's Vision Zero approach.
68. A full Construction Management Plan should be secured through condition, in line with Policies T4 and T7. As with the outline construction management plan, it should detail the measures that will be implemented to ensure that the proposed development will not impact on the surrounding transport network.

Sustainable development

Energy strategy

69. An energy strategy has been provided, however an Energy Statement covering both blocks of the development should be submitted. Further information is also required in relation to the Be Lean requirements for Linear Block building, overheating, ASHP, PV roof layout and PV provision. Further correspondence in relation for DHN potential. The applicant should also propose a site-wide network and provide on site network and future connection drawings.
70. Detailed comments in this regard have been provided to the applicant and Council in full under a separate cover. The applicant should respond to this detailed note to address outstanding issues to ensure compliance with the London Plan in advance of the borough planning committee to ensure that any conditions can be appropriately secured.

Whole Life Carbon

71. The applicant has submitted a WLC report which appears to cover much of the assessment requirements, From the model inputs the applicant needs to confirm the window option (single glazed panes and aluminium frame instead of window system). Clarification as to why are the hinges, gaskets etc. are not considered in the model as those would increase the total WLC figure.

72. The applicant has recently submitted a revised template and once reviewed, detailed comments will be provided to the applicant and Council. The applicant should respond to this detailed note to address outstanding issues to ensure compliance with the London Plan in advance of the borough planning committee to ensure that any conditions can be appropriately secured.

Circular Economy

73. A Circular Economy Statement has been submitted, however it is very high level and there are a number of outstanding issues across all the criteria. Detailed comments have been provided to the applicant and Council in full under a separate cover. The applicant should respond to this detailed note to address outstanding issues to ensure compliance with the London Plan in advance of the borough planning committee to ensure that any conditions can be appropriately secured.

Digital Connectivity

74. No information has been provided in relation to digital connectivity, therefore compliance with Policy SI 6 cannot be determined.

Environmental issues

Urban greening

75. The proposed development presents a well-considered approach to integrating green infrastructure. This includes the incorporation of rain gardens and green roofing which supports multifunctionality, in accordance with Policy G1 of the London Plan.

76. The applicant provides an Urban Greening Report, which states that the methodology which has been used is the GLA Urban Greening Factor for London, 2017. The report states that the criteria in Table 1 of the report has been directly transposed into Policy G5 on the London Plan 2021, which is incorrect. For example, Wetland or open water is identified as having a factor of 2 in the report but has a factor of 1 in Policy G5.

77. The applicant should use the latest guidance available, as provided below, to calculate the UGF score for the site. The applicant should seek to increase quality and quantity of urban greening where possible. The applicant should also provide a standalone surface cover type drawing to accompany the UGF calculation. This should be provided prior to Stage 2.

Biodiversity

78. The site lies within the Mottingham Nature Reserve and River Quaggy Site of Importance for Nature Conservation (SINC), identified as being of Borough grade

It is important. In accordance with Policy G6 of the London Plan the applicant should avoid impacts to the SINC and set out in the application how they will avoid direct or indirect impacts on the SINC. If avoidance of impacts is not possible the applicant should set out how they have followed the mitigation hierarchy to minimise development impacts.

79. The applicant should provide an assessment of the potential impacts to the SINC, specifically construction impacts and indirect impacts of noise, shading and lighting (with reference to Paragraph 8.6.5 of the London Plan). This should be provided prior to Stage 2. Further guidance on designing with reference to SINC's can be found in the Urban Greening and Biodiversity Net Gain Guide.
80. The applicant should prepare a Construction Environment Management Plan (CEMP) to set out how such impacts will be avoided and mitigated, as suggested in the Preliminary Ecological Appraisal. The CEMP should be secured by condition and approved prior to construction.
81. The applicant provides a Biodiversity Net Gain (BNG) Assessment which reports a +4.15% BNG for the proposed development. The applicant should explore any further opportunities to increase the BNG as the proposals progress.

Trees

82. There are a number of existing trees on site. The Arboricultural Impact Assessment (AIA) states that two Category B trees, 11 Category C trees and three Category U trees are to be removed as part of the proposed development. The DAS states that 40 trees are proposed as part of the proposed development.
83. Wherever possible, trees of value should be retained. The applicant should provide an assessment of the value of the trees to be lost using the appropriate valuation system and set out how this has been accounted for through replacement tree planting. Tree value can be derived from 'i-tree' or 'CAVAT', or another appropriate valuation system, in accordance with Policy G7 of the London Plan.
84. The applicant appears to demonstrate a consideration of a diverse range of proposed tree species, which is positive in terms of biosecurity and should be brought to fruition. The applicant should also consider large-canopied trees to target urban heat island effects.

Flood Risk

85. The Flood Risk Assessment generally complies with London Plan Policy SI 12.

Sustainable drainage

86. The drainage strategy proposes to restrict runoff to 4.0 l/s for the overall site for the 100-year event plus 40% climate change. This is supported.
87. Surface water is proposed to be discharged into an existing pond located to the west of the site which presumably connects into the Quaggy River. Further

information is required regarding the existing pond to understand whether it is a feasible discharge location. This should include anticipated depths of the pond to understand if a gravity discharge is feasible and a capacity assessment to understand whether the site would increase the risk of flooding elsewhere.

88. The drainage strategy drawing should include dimensions (i.e. depths) of the proposed attenuation features.
89. In terms of SuDS, the drainage strategy proposes permeable paving and rain gardens, which is welcomed.
90. The drainage strategy makes no mention of rainwater harvesting or green roofs. These should be provided to satisfy the requirements of London Plan Policy SI 13.

Water Efficiency

91. The proposed development does not currently meet the requirements of London Plan Policy SI 5 as no information has been provided. The applicant should demonstrate how the development will meet policy requirements. Rainwater harvesting and re-use should be included to reduce water consumption across the site, which can be incorporated within the surface water drainage strategy to provide a dual benefit.

Air quality

92. An Air Quality Assessment has been submitted. The proposed development is not located in, nor will it significantly impact, an Air Quality Focus Area.
93. There is no discussion of any emergency generators included (even if to say they are not included). Further information is therefore required to demonstrate compliance with London Plan Policy SI 1 (B) (1a-b).
94. The proposed development will not result in any building emissions, so development is better than air quality neutral for building emissions. The assessment concludes that the development is better than air quality neutral for transport emissions, based on the fact that there will be no additional traffic generated. This method is incorrect and the total car trip generation of the development should be compared against the transport emissions benchmarks, in order to determine whether the development is air quality neutral. Further information is therefore required to determine compliance with London Plan Policy SI1 (B) (2a).
95. The following conditions should be secured.
 - On-site plant and machinery must comply with the London Non-Road Mobile Machinery (NRMM) Low Emission Zone standards (London Plan Policy SI 1 (D)).
 - Measures to control emissions during the construction phase relevant to a medium risk site should be written into an Air Quality and Dust

Management Plan (AQDMP), or form part of a Construction Environmental Management Plan, in line with the requirements of the Control of Dust and Emissions during Construction and Demolition SPG. The AQDMP should be approved by the LPA and the measures and monitoring protocols implemented throughout the construction phase (London Plan Policy SI 1 (D)).

Local planning authority's position

96. Bromley Council planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting.

Legal considerations

97. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application. In this case, the Council need not refer the application back to the Mayor if it resolves to refuse permission. There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

98. There are no financial considerations at this stage.

Conclusion

99. London Plan policies on education, MOL, urban design, transport, sustainable infrastructure and environmental issues are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:

- **Land use principles:** Educational use is supported. Although the development is considered inappropriate development on MOL, as it does not satisfy any of the exception tests in paragraph 149 of the NPPF, the applicant has demonstrated very special circumstances in regard to the need for specialist college and that there are no alternative sites that are sequentially preferential. The principle of the reconfiguration of the college site in MOL is therefore supported subject to the further assessments requested. London Plan Policies G3 and S3.

- **Urban Design:** Further details are required in relation to siting of the Welcome Block and an updated Fire Statement. London Plan Policies D3 and D12.
- **Transport:** The scheme does not comply with London Plan policy in relation to parking. An Active Travel Zone Assessment should be undertaken. No information has been provided in relation to servicing and deliveries. Further detail is also required in relation to drop off area, cycle parking, disabled parking and trip generation, Pedestrian / cycling routes to the site. The scheme will also be required to contribute towards bus shelter upgrades. London Plan Policies T2, T4, T5, T6, T6.5 and T7.
- **Sustainable Development:** Further information is required in relation to energy, whole life carbon and circular economy. No information has been submitted in relation to digital connectivity. London Plan Policies SI 2, SI 3 and SI 7.
- **Environmental Issues:** The urban greening factor has been incorrectly calculated. Further information is required in relation to the SINC, trees, drainage, water efficiency and air quality. London Plan Policies G5, G6, G7, SI 13, SI 5 and SI 1.

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