

Committee Date	17.08.2023		
Address	Justin Hall Beckenham Road West Wickham BR4 0QS		
Application Number	22/04833/FULL1	Officer - Catherine Lockton	
Ward	West Wickham		
Proposal	Proposal for the erection of a new school building, the refurbishment of existing buildings and an extension to Justin Hall, together with access, parking and landscaping at St David's Prep		
Applicant	St David's Prep		Agent
	C/O Hume Planning Consultancy Innovation House, Discovery Park Innovation Way Sandwich Kent CT13 9ND		Hume Planning Consultancy Ltd
			Innovation House Discovery Park Innovation Way Sandwich CT13 9ND
Reason for referral to committee	Major application outside of delegated authority	Councillor call in No	

RECOMMENDATION	PERMISSION BE GRANTED SUBJECT TO LEGAL AGREEMENT
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KEY DESIGNATIONS Urban Open Space Air Quality Management Area Area TPO Biggin Hill Safeguarding Birds Biggin Hill Safeguarding Area PTAL Level 2 Smoke Control SCA 51

Land use Details				
	Use Class or Use description	Floor space (GIA SQM)		
Existing	F1(a) Education	602sq.m.		
Proposed	F1(a) Education	1,617sq.m.		
Vehicle parking		Existing number of spaces	Total proposed including spaces retained	Difference in spaces (+ or -)
Staff Car parking spaces		12	18 (including 1 disabled space)	+6 (including 1 disabled space)
Cycle parking spaces for both staff and students		8	29 cycle 30 scooter	+21 cycle +30 scooter

Electric car charging points	2 active 3 passive
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Representation summary	Adjoining neighbours were consulted by letter on 04.01.2023 and 17.04.2023. A Site Notice was displayed at the site on 05.01.2023. A Press Advert was published on 25.01.2023 in the News Shopper.
Total number of responses	116
Number in support	65
Number of objections	48
Number of neutral	3

Section 106 Heads of Term	Amount	Agreed in Principle
Carbon offset Contribution	£1,425	YES
Highway Improvements Contribution	£20,000	YES
Monitoring Fee	£500 per head of term	YES
Total	£22,425	YES

1 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The applicant has evidenced that there is a demonstrable need for the ongoing use of the existing building with expired permission and the proposed additional educational buildings to cater for children already on the school roll and to meet future expansion. Furthermore, the proposed buildings have been sensitively designed to limit the impact on the Urban Open Space without compromising the educational requirements.
- The scale, layout and appearance of the proposed development would respond appropriately to its setting and, given its siting, would not cause any undue harm to neighbouring amenity.
- The proposal seeks to introduce new landscaping and biodiversity enhancements to contribute to the nature conservation value of the site, achieving a Biodiversity Net Gain of +133.90% and an Urban Greening Factor of 0.58.
- The proposal would provide an appropriate amount of car parking given its use and location and would not result in any significant adverse transport impacts. Additional cycle and scooter parking is also proposed as part of the development and this along with the submitted Travel plan will help to encourage more sustainable and active modes of transport. The applicants have also agreed to a contribution towards the construction of a Zebra Crossing on Beckenham Road to improve crossing facilities in the area.
- It is considered that the proposed development is acceptable and is recommended for permission, subject to the prior completion of a S106 legal agreement.

2 LOCATION

- 2.1 The application site is located at the junction of Beckenham Road and St David's Close. It has a site area of approximately two hectares and comprises of St David's Prep school buildings and grounds.

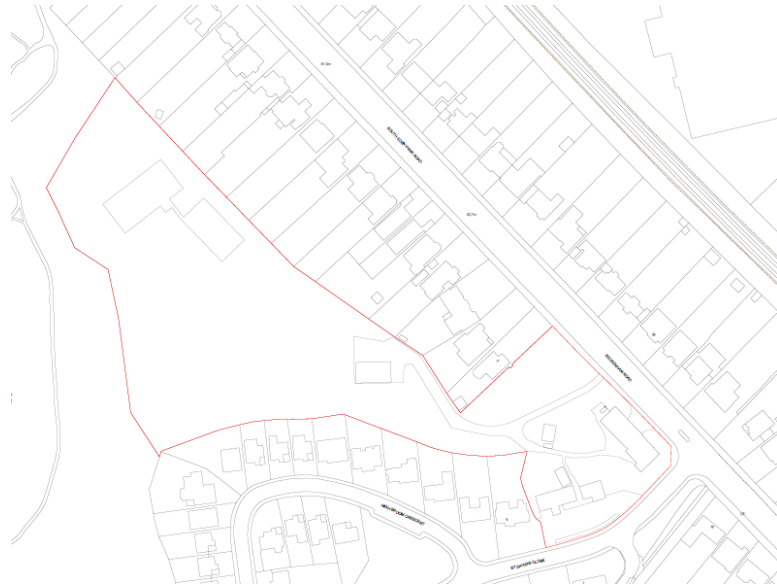


Fig.1 – Site Location Plan

2.2 St David's Prep school is an independent school providing education from Pre-Reception up to Year 6. The existing school buildings are located in the eastern corner of the site fronting Beckenham Road and St David's Close.



Fig.2 – Site Photo of existing Justin Hall school building



Fig.3 – Site Photo of existing temporary school building on St. Davids Close

- 2.3 The majority of the site is located on land designated as Urban Open Space.
- 2.4 There are a number of trees within the site boundaries. An Area Tree Preservation Order (TPO) (ref 406A) covers part of the site.
- 2.5 The application site lies within Flood Zone 1, which means it has a low probability of flooding.
- 2.6 The site lies within a Public Transport Accessibility Level (PTAL) of 2 (on a scale where 0 is worst and 6b is excellent).
- 2.7 The existing site currently includes two vehicular accesses from Beckenham Road and two vehicular accesses from St David's Close.
- 2.8 The site is located within the Bromley Air Quality Management Area (AQMA).

3 PROPOSAL

- 3.1 The application proposes the erection of a new school building, the refurbishment of existing buildings, an extension to Justin Hall, and the retention of single storey detached building (fronting St David's Close) for an additional temporary period, together with access, parking and landscaping at St David's Prep.

Existing School Layout

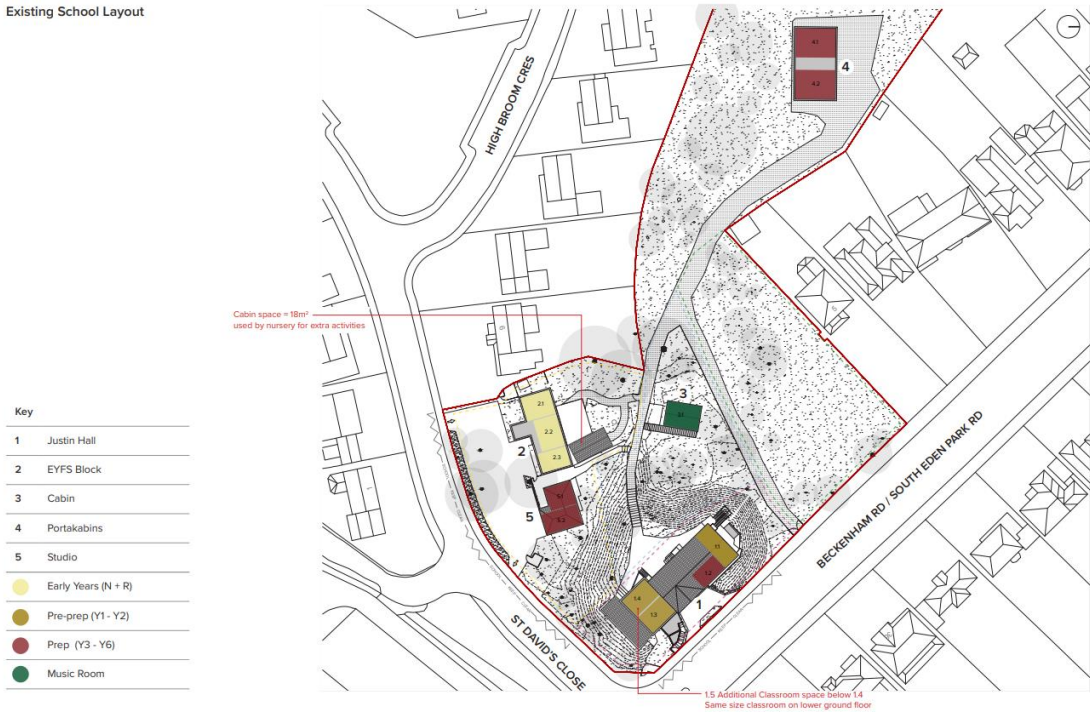


Fig.4 – Existing School Layout

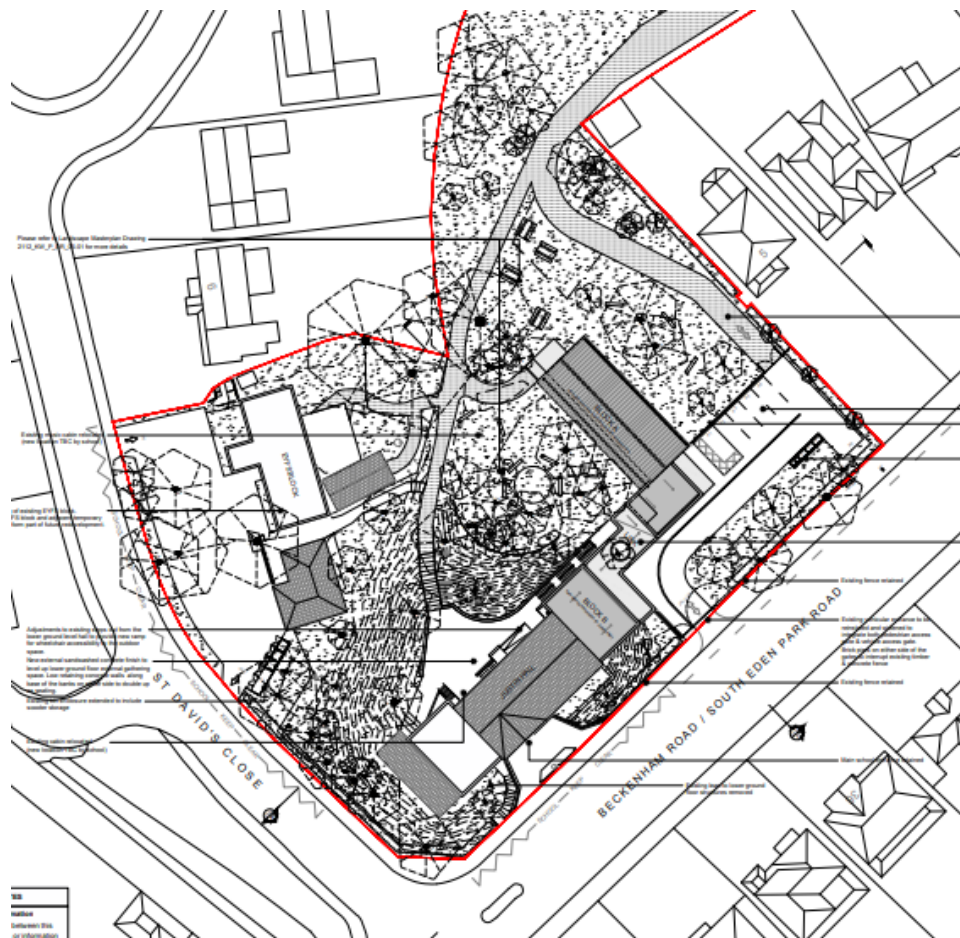


Fig.5 – Proposed Site Plan

3.2 The proposed development would comprise;

- Construction of a two storey building (Block A) to the north-western side of Justin Hall to provide;
 - 3 classrooms, girls WC and changing area, and disabled WC at ground floor; and
 - 3 classrooms, boys WC and changing area, and plant room at first floor.

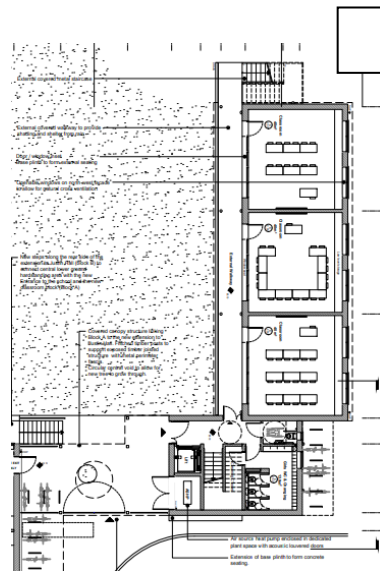


Fig.6 – Proposed Ground Floor Plan

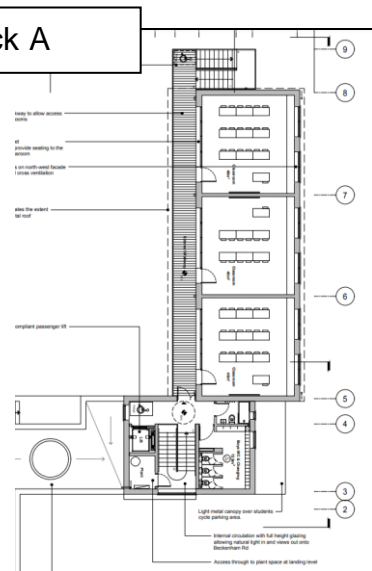


Fig.7 – Proposed First Floor Plan

The new building would include both internal and external steps with an external walkway provided along the south-eastern side of the building to provide access to the proposed classrooms. A lift would also be included within the extension.

- Construction of a two storey extension to the north-western side of Justin Hall (Block B) to provide;
 - a new kitchen, store cupboard and office on the lower ground floor; and
 - two classrooms at ground floor.

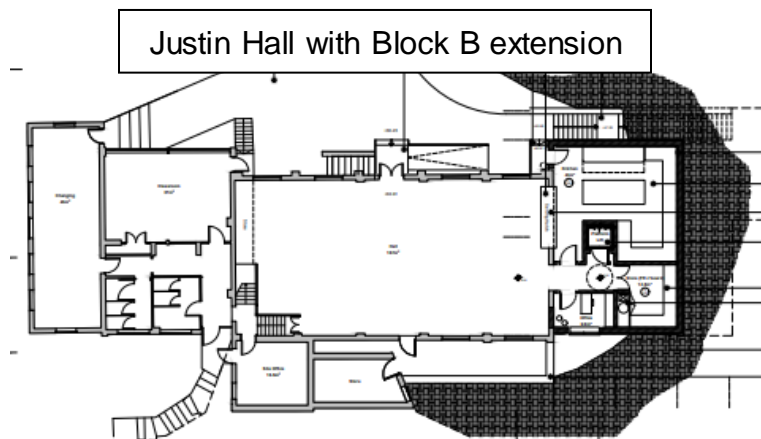


Fig.8 – Proposed Lower Ground Floor Plan

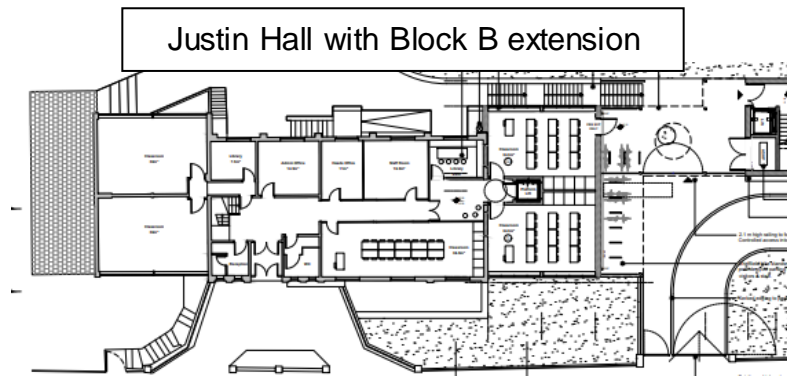


Fig.9 – Proposed Ground Floor Plan

The new extension would be accessed internally via doors from the existing school hall. A lift would also be included within the extension. A timber canopy would link the proposed extension (Block B) to the new building (Block A) with metal railings proposed along the front to provide controlled access.

- Internal changes are also proposed to Justin Hall to include;
 - change the existing kitchen on the lower ground floor into a site office; and
 - change an existing classroom at ground floor into an access into the new extension, a library, and as an extension to an existing classroom to provide an additional 10.5sqm.

- External alterations are also proposed to include;
 - changes to external access at the rear of Justin Hall to include the addition of a ramp;
 - new covered bicycle parking;
 - new pedestrian and vehicular access from Beckenham Road, utilising existing maintenance access;
 - six new staff car parking spaces, including one disabled bay and two EV charging points; and
 - new maintenance access path to provide access to rear playing fields.

3.3 The existing single storey detached building which fronts St David's Close is also proposed to be retained for an additional temporary period of five years to continue the provision of three classrooms for the Early Years Foundation Stage. The roof is also proposed to be replaced.

3.4 The proposed development would include 8 new classrooms. However, as one existing classroom on the ground floor within Justin Hall would be lost to facilitate the proposed extension, a total of 7 new classrooms would be provided. This would provide an increased capacity for the school to increase each year from nursery to Year 6 to a two-form intake by 2026/2027.

- 3.5 The school currently has 182 pupils and 37 members of staff (32 Full Time Equivalent (FTE)). The recent addition of temporary classrooms (within portacabins) on site provides the capacity to accommodate up to 197 pupils by the 2023-2024 school year.
- 3.6 Through the development proposals the school is seeking to accommodate a total of up to 298 pupils, with 45 staff members (41 FTE), by 2026/2027.

4 RELEVANT PLANNING HISTORY

- 4.1 The site has an extensive planning history, with many applications for development between the early 1980's and present day. The vast majority of the permissions have been implemented and have mainly comprised additional classroom and teaching space in the form of mobile/temporary units.
- 4.2 The relevant planning history can be summarised as follows;
- 99/02232/FULL1 – Single storey extension to Justin Hall (increased dimensions of extension permitted under ref: 98/01461) (RETROSPECTIVE APPLICATION). Permitted 09.09.1999.
 - 04/02623/FULL1 – Single storey detached building for music classroom and practice room. Permitted 18.11.2004.
 - 05/02030/VAR - Use of single storey detached building for music classroom and practice room permitted under ref: 04/02623 without complying with conditions 7 and 8, to enable the use to start at 0800 and additional use for 9 evening committee meetings per annum until 2200. Refused 03.08.2005.
 - 14/00472/RECON – Retention of single storey detached building without complying with condition 1 of planning permission ref. 08/00033 which states that 'The detached single storey building known as "The Little School" hereby permitted shall be removed and the land reinstated to its former condition on or before 19.02.13'. Approved 26.03.2014.
 - 18/02280/PLUD - Single storey, standalone interlocking timber built building. Lawful development certificate (proposed). Approved 30.07.2018.
 - 16/00081/RECON1 - Minor material amendment under Section 73 of the Town and County Planning Act 1990 to allow a variation of the planning permission 10/03388/FULL1 (as amended by planning permission 16/00081/RECON) for retention of single storey detached timber framed building for use as temporary classroom in order to allow an extension of three years to the existing permission so that this classroom can be retained until such time as a masterplan has been formulated, any required permissions have been obtained and any new or replacement buildings have been constructed. Approved 28.04.2021.

- 21/01611/FULL1 - Installation of a temporary double classroom building for a period of three years. Refused 20.07.2021 for the following reasons;
 - *Insufficient and conflicting information has been submitted to evidence a demonstrable local need for the additional educational building to ensure the provision of an appropriate range of educational facilities at the site in relation to current or proposed school numbers and facilities contrary to Policy 27 of the Bromley Local Plan and Policies S3 of the London Plan.*
 - *Insufficient information has been submitted to evidence that the area of the location of the building on hardsurfaced play space is not surplus to requirements or that the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location, contrary to Policy 58 of the Bromley Local Plan and Policies S3 and S5 of the London Plan.*
 - *The siting and rudimentary design of the building at this location in designated Urban Open Space (UOS) is considered to impair the open nature of the site where demonstrable local need for the additional educational building has not been evidenced, contrary to Policies 27, 37 and 55 of the Bromley Local Plan and Policies S3, G4 and D3 of the London Plan.*
 - *Insufficient information has been submitted to establish the highway impacts of the development. As such the proposal has not demonstrated that the development would not be liable to prejudice the free flow of traffic and conditions of general safety along the adjacent highways contrary to Policy 32 of the Bromley Local Plan and Policy T4 of the London Plan.*
- 21/05730/FULL1 – Proposal comprising the installation of a temporary single storey, double classroom building for a period of three years. Permitted 11.03.2022.
- 21/05730/AMD – Amendment to planning application Ref DC/21/05730/FULL1: The height in the drawing submitted in the initial application was incorrect. The additional size was due to the need to level the buildings during installation and that the change only adds 0.4m (at one end). See drawing reference RCSDPSNMAPE. Approved 27.10.2022.

5 CONSULTATION SUMMARY

A) Statutory

5.1 Highways (Highway Authority) – No objection, subject to conditions

- The site is located in an area with PTAL rate of 2 on a scale of 0 – 6b, where 6b is the most accessible.
- Access

- The development proposals will provide a new pedestrian entrance to the school adjacent to the access to the new staff parking area. The new access will enable pupils to enter and exit the school at three points so as to distribute activity more evenly around the site. It is proposed that Years 3 to 6 will use the new point of access.
- The vehicular access to the new car parking areas provides sufficient visibility for drivers emerging from the site of pedestrians of the footway and vehicles on Beckenham Road.
- Trip generation
 - The parking surveys showed that demand for parking on street in the vicinity of the school increased by a maximum of 68 vehicles, whilst the modal split data from the 2022 travel survey suggests that 118 cars would be travelling to and from the school to drop off and pick up pupils. As such, it is considered that the extended school, if fully attended, could result in an additional 44 vehicles stopped on street in the vicinity of the school for a brief period at the start and end of the school day.
 - As the strategy of staggered start and end times for year groups, and the provision of before and after school clubs, not all of these vehicles would be stopped near the site at the same time.
 - Currently the majority of pupils travel to the site by car and on the basis that the number of pupils car sharing is at least two, an increase in pupil numbers to 298 could result in an additional 75 cars visiting the site to drop off and pick up children and a further three staff vehicles parking on street near the school, given that 6 staff vehicles could be accommodated within the new staff parking area.
 - The parking survey recorded that there was capacity to accommodate demand for additional parking on streets near the school with space for 119 additional cars to park during the busiest period.
 - If car use for trips to and from the site were to increase proportionally in line with increases in staff and pupil numbers, there is some capacity on street to accommodate any increase in demand for parking at the beginning and end of the school day. The increase in pupil and staff numbers will occur over three academic school years and Travel Plan monitoring will enable any increase in car use to be identified and additional measures implemented to reduce the car use.
 - However, in order to relieve the pressure and address the safety issues around the school site, LB Bromley is proposing to construct a Zebra Crossing on Beckenham Road at the junction with St David's Close. The applicant should contribute towards the cost of the scheme. A sum of £20,000 should be secured via S106 agreement.
- Car parking
 - The new parking area will provide car parking for 6 staff vehicles including one larger space suitable for use by blue badge holders.

- The provision of 6 car parking spaces seeks to strike a balance between minimising the potential for additional staff parking on streets in the vicinity of the site whilst not providing a level of provision that encourages car use in favour of more sustainable travel modes.
- Staff that car share will be given priority to use this new parking area other than the disabled parking space which will be allocated to accommodate demand by blue badge holders.
- Cycle and scooter parking
 - New cycle and scooter parking will be provided more than minimum of the London Plan standards to encourage and facilitate an increase in travel by scooter and bicycle.
- Delivery and servicing
 - The level of delivery and servicing activity is not predicted to increase from existing levels. All vehicles will continue to stop on street when visiting the site although the revised refuse storage arrangements mean that refuse collection vehicles will stop further away from the junction of St David's Close with Beckenham Road which is considered to be an improvement over the existing situation.
- Travel Plan
 - Travel Plan in its current format is acceptable and the Council will continue to liaise with the school about development of the initiatives mentioned in the plan.

5.2 Drainage (Lead Local Flood Authority) – No objection, subject to condition

B) Local Groups

5.3 Orpington Field Club & Bromley Biodiversity Partnership Sub-Group – addressed in Section 7.3

- Loss of woodland habitat including loss of associated soil fauna and flora and carbon sink
 - Felled woodland appears quite likely to have been relict ancient woodland, in which seeds of the pioneer species, Sycamore, germinated about 27 years ago following some disturbance or tree loss which allowed more light to reach the ground.
 - Proximity of the site to the ancient High Broom Wood, which is listed on the Ancient Woodland Inventory, and to which it is connected by a short line of trees at the west of the proposed development site makes it highly likely that the area was once part of High Broom Wood and the playing field to the north in the wider site shares a boundary with this wood.
 - In late February 2023 young leaves of native bluebells (*Hyacinthoides non-scripta*), one of a suite of Ancient Woodland Indicator species, were noted along the proposed development site boundary with No. 5 South Eden Park Road and around stumps to the south, also on the steep bank at the boundary with St David's Close.

- The ecological survey was carried out in October when ancient woodland indicator species would not have been above ground.
- According to the PEA paragraph 4.1.2 the trees felled were mainly young and 69% sycamore. However, this does not mean that the woodland habitat here is not ancient.
- According to Bromley Biodiversity Plan, Section 4.1, paragraph 2, *'The soil in these woodlands is of prime importance because although the trees were regularly harvested, the ground was relatively undisturbed for hundreds of years and therefore supports a very complex community of interdependent organisms including fungi, very many tiny animals and plants. Many of them are not found away from this habitat and support special invertebrates. This habitat is irreplaceable, a fact acknowledged in the NPPF, Paragraph 175c.*
- Before any work commences a ground cover survey must be carried out in April to ascertain the importance of the flora so that any natural ancient woodland flora can be retained.
- Loss of scrub
 - Loss of trees and scrub, disruption of soil rich in diversity of soil organisms and an important carbon sink is a source of serious concern in this proposal. The planting of replacement native trees, although essential, will not for many years compensate for the loss of the large tree canopy shown on google maps before tree felling took place because young trees will not support as many leaves and will be unable to take up as much CO₂. There will therefore be both a large biodiversity and carbon loss as a result of the proposed development.
 - Scrub comprising native species is a very valuable habitat providing food and protection for birds including nesting birds, food for pollinators including butterflies and moths, shelter and hibernation sites for animals such as hedgehogs.
- Inclusion of Elder (*Sambucus nigra*) - also a native tree/shrub, Domestic apple (*Malus pumila*), Domestic Plum (*Prunus domestica*) and Domestic Pear (*Pyrus communis*) also listed on the Allergy-friendly replacement tree and shrub planting lists of the Tree Survey Arboricultural Integration Report would also support biodiversity.
- Native Wildflower seed mix should be spread across steep banks to help stabilise them and provide grassland habitat for pollinators and invertebrates. This should be cut annually in August/September and all arisings removed and composted.
- Hybrid Bluebell was seen along the boundary fence with Beckenham Road. They should be removed to prevent cross pollination and hybridisation with the native bluebells in High Broom Wood and further spread of the hybrids which are fertile.
- If planning permission is granted it should include conditions relating to;
 - Retention and protection of as many remaining trees as possible, retention of as much scrub as possible; and retention and protection of remaining ancient woodland flora (ground cover species) both during construction and afterwards.
 - Retained trees and woodland to be protected as per Tree Survey Arboricultural Integration Report.

- Replanting with UK native tree species as per PEA 5.2.2, to replace those lost and no invasive species to be included in the planting schemes - all tree and hedge planting must include a high percentage of native species for the maintenance and future enhancement of biodiversity.
- Tree planting to be carried out with minimum disruption to soil.
- Mixed native species hedgerow to be planted at boundaries (as per Urban Greening Factor Plan) and proposed hedge and tree planting adjacent to No. 5 South Eden Park Road should be on the bank rather than in the boundary ditch as this may be important for drainage during wet weather.
- Lighting should be the minimum required for site safety and angled away from site boundaries and trees, woodland and any installed bat or bird boxes, following all measures in the PEA paragraph 5.2.5.
- Construction Environmental Management Plan (CEMP) as per PEA to be approved before any work commences, to include the covering of any excavations at night or weekends to prevent animals such as foraging badgers and hedgehogs from falling into them and being unable to escape and protective fencing of any ancient woodland ground flora to prevent storage of heavy materials and equipment on top of it.
- As per PEA a pre-construction badger survey to be carried out 6 weeks before site clearance / construction commences.
- To avoid disturbing nesting birds any woody vegetation should be cleared outside the nesting bird season, or after a check by a competent person if clearance is scheduled between March and August (inclusive).
- PEA paragraph 5.2.7 a mammal hole, probably used by fox is present under Building B5. Wild mammals are protected from inhumane treatment by The Wild Mammals (Protection) Act 1996. Care should be taken during building and vegetation clearance to prevent such animals being crushed and / or asphyxiated by heavy machinery.
- Integrated swift bricks in the new building to be considered.
- Development to retain decayed and dead wood in stag beetle loggeries see PEA Appendix 3, Figure A3.2 and wood piles as habitat for invertebrates and fungi.
- The development should ensure hedgehogs can move through the wider site and access High Broom Wood.
- Installation of integrated bat boxes on south-east and/or south-westerly aspects of new buildings to be considered.

5.4 RSPB Bromley Local Group – *addressed in Paragraph 7.3.18*

- The installation of 3 integral swift bricks are recommended as a planning condition.

5.5 West Wickham Residents' Association (WWRA) – *addressed in Sections 7.3 and 7.4*

- Support the development of educational facilities and resources in general, but have serious concerns about some aspects of this application and raise objections on the following grounds:
 - The traffic situation at this location is considered dangerous and often illegal as outlined by the many neighbour objections to this proposal. As the new facilities exit and entrance now appears to be onto a major and very busy road, this problem will be exacerbated.
 - WWRA do not believe the site clearance has been taken into account when assessing ecological impact and Biodiversity Net Gain (BNG) which it should be. The previous arborists report and google earth imagery (see first image attached) shows the application site had a dense canopy of deciduous woodland. Recent clearance work has removed the entire canopy and left areas of bare ground.
 - Even if trees were removed prior to submitting the planning application, under British Standard 42020, a retrospective impact assessment is required where it is clear that habitats at a site have been cleared or modified prior to assessment by an ecologist. Under the precautionary principle, if any habitats are cleared, the impact assessment should assume that the value of those habitats were of the highest possible value, and further may have to make precautionary assumptions about what species this habitat may have supported. The Environment Act makes it clear that any subsequent biodiversity change calculation for the site will have to consider habitat values before the site was cleared, and, as in impact assessment, this also means that habitats of the highest value would have to be used within the Metric. It is a requirement of the CIEEM professional code of conduct to comply with BS42020 and this application is no exception.

C) Adjoining Occupiers

5.6 Objections

- Impact on highway – *addressed in Section 7.4*
 - Not enough additional parking spaces for the significant increase in staff and parents.
 - The proposal will result in an additional 75-120 cars travelling to and parking in the area on a twice daily basis.
 - Inconsiderate parking by staff and parents already a serious problem in surrounding roads which impacts local residents exiting their drives safely, pedestrian's crossing and emergency and refuse vehicles gaining access.
 - The school travel plan is encouraging parents to park on Beckenham Road and South Eden Park Road which is going to intensify existing visibility issues for residents existing and entering drives.
 - Increased traffic on an already busy road will cause more congestion which will be dangerous for road users and pedestrians.
 - The T-junction at Beckenham Road and St. David's Close is already very dangerous and more cars going in and out of this close will make it worse.

- There should be a car park and drop-off area for students within the site.
- Most students are driven to school.
- There are several other schools located on the same main road within 1 mile of the site which cause traffic and parking issues.
- More crossing facilities should be provided on Beckenham Road/South Eden Park Road.
- Local cycle routes, which the travel plan encourages teachers, parents and pupils to use, will be obstructed by cars parked in the cycle lanes.
- The road is already very dangerous with cars speeding and accidents which have not been logged.
- Parking should be prevented between 8-9am and 3-4pm instead of 1-2pm.
- The school should encourage better habits for parents and staff for getting to and from the school such as walking.
- Encouraging 3-11yr olds to cycle to school on a busy main road is not realistic.
- The suggestion that parents could park on Pine Avenue and walk/scoot through Blakes Rec. is not realistic as this is already a congested road due to parking for Oak Lodge School.
- The staggered start times span only a ten minute period which is not likely to significantly reduce activity levels on surrounding roads.
- The plan does not offer any impetus for a change in the method of transport for future students.
- The surveys are not a true reflection of people's habits and behaviours.
- If majority of attendees live within 10 minutes of the catchment area why do they drive.
- Where will the additional 119 cars park and if these are on the main road then this will make the situation to safely cross this road worse.
- The zebra crossing has now only been agreed because St. David's want to increase their size.
- The school's car parking and road safety guidance states that parents are requested not to park on St. David's Close but also requests that cars not park opposite each other within St. David's Close which is a contradiction if they are not supposed to park there.
- Current car park on St David's Close is underused.
- Parents arrive early to collect children inhibiting safe movement of traffic.
- The application will result in a total increase of body numbers of 77% with the number of cars rising by the same percentage which the roads cannot cope with.
- Added traffic and cars will be a safety hazard.
- A walking bus should be introduced.
- Should consider a mandatory school bus for new pupils.
- If the school is funding a new crossing this should free up money for more safe crossings further along the road.
- Loss of trees – *addressed in Section 7.3*
 - The trees have already been cleared.

- Significant replanting should be provided.
- Loss of trees causing an impact on the privacy of neighbours, biodiversity and air quality.
- Loss of privacy – *addressed in Section 7.5*
- Impact on air quality as a result of loss of trees and increased number of cars – *addressed in paragraphs 7.8.5 to 7.8.8*
- Impact on noise – *addressed in paragraph 7.8.9 to 7.8.11*
- The additional school spaces are not necessary and the school does not have a catchment area as it is an independent school. The increase in school places will not benefit the local community – *addressed in Section 7.1*
- The school has not consulted neighbours with their plans - *addressed in Section 7.9*
- Other Matters
 - The proposal will exacerbate mental health issues and stress for surrounding residents due to increased levels of car pollution, noise pollution and traffic.
 - Inadequate consultation period.
 - Damage and disruption from building works to neighbouring residents.
 - The temporary building has been built too high.
 - Will the temporary portacabin definitely be demolished.
 - The school shouldn't take on more children.

5.7 Support

- Improvement in school facilities
 - The school are helping ease the scarcity of decent pre-school childcare.
 - The plans seek to address the underinvestment at the school to allow it to provide fit for purpose, modern educational facilities.
 - The school needs extra space for their students.
 - Benefit to existing pupils.
 - School is in need of modernisation.
 - The school will be more accessible for children with additional physical needs which should be encouraged.
 - The proposal will enhance the learning environment and improve accessibility.
 - Current building is outdated and in need of renovation.
 - Investment in education.
 - The proposal will provide more modern facilities and improve the learning environment.
- Increase in school places for local area
 - The school will no doubt be asked to take students from Wickham Court school closing.
 - The new building will mean more much needed school places in Bromley.
 - Ease pressure on other over-subscribed schools
 - Increase in size will also increase availability for local residents.
- The school is an exceptional school

- St. David's is an exceptional school which supports the wider community and the students of the school.
- Landscape and biodiversity.
 - Trees which look to have been diseased or heavily damaged and posed a risk to children have been removed.
 - The replanting will benefit the children and the local habitat and wildlife.
 - Better landscaped grounds which will benefit the children and visual appearance of the school.
- Impact on highway
 - The school does a very good job managing traffic at peak periods around drop off and pick up and actively participates in traffic reduction activities.
 - A comprehensive travel plan has been provided as part of the submission.
 - The traffic disruption is limited to a short period at the beginning and end of the school day which is the case with most schools.
 - The application will make it safer for children going to school.
 - The school are highly conscious of the impact of the school on the immediate local area and work consistently to put in and reiterate guidelines for parents to minimise issues with parking.
 - Many siblings attend the school and so there won't be another 100 cars.
 - Many children do scoot/walk/cycle to school and the school encourages the Smart Movers programme where children get monthly badges if they walk or do park & stride.
 - Even with expansion the school is small and has a high number of siblings attendance and many local children so the concerns about traffic may be overstated.
 - Traffic on surrounding roads includes pupils of neighbouring schools which are much bigger and the proposed expansion to St David's will minimally impact traffic within the overall context.
 - The development plans have considered greater parking on site.
 - Concerns about increase in traffic may be overstated as traffic on roads also include pupils of neighbouring schools.
 - Improvement to access and parking will benefit the immediate local area.
 - Better crossing facilities would encourage more walking or taking the bus knowing there is a safe route helping to alleviate parking concerns.
 - There are proposed measures to mitigate any traffic issues.
 - Staff car parking will reduce all day parking on neighbouring roads.
 - The school is already working hard with parents to adopt safe, eco-friendly modes of transport and adapt existing travel arrangements to minimise traffic, including: staggered start and end times, encouraging walking, scooting or 'park and stride' to and from the school rewarded with house points, staff patrolling the area, and parents being frequently reminded of these options and the need to be thoughtful when parking.

- Concerns could be alleviated with a pedestrian crossing on South Eden Park Road.
- The proposal will improve the flow of pupils in and out of the school and the additional entrance should spread the impact of additional pupils further around the perimeter rather than all being concentrated in the Close.
- Impact on local area
 - The plans are to provide more space for the children in a sympathetic manner to the local environment.
 - The school is maintaining the woodland feel.
 - The school buildings will improve the appearance of the local area and are sensitive to the locality and sheltered within the school grounds.
 - Sympathetic to surrounding dwellings and environment.
 - The school buildings will improve the appearance of the local area and are sensitive to the locality and sheltered within the school grounds.
 - The plans are sensitive and complementary to the area.
 - Improvement to visual appearance of the school.
 - Proposals appear in keeping and appropriate to the current architecture.
- The presence of other, much larger, schools nearby should not mean that St. David's is unable to update its buildings and create bit space.
- The buildings will not adversely affect neighbouring properties.
- The school encourages the children to look after the environment.
- The school is working towards an Eco School accreditation which will benefit the local area.
- Compared to other surrounding schools, even with expansion the school is very small and has a high number of sibling attendance and many local children.
- Creation of local jobs.
- Precedent set at the site as it already houses a school.
- Proposal will be a benefit to community.

6 POLICIES AND GUIDANCE

- 6.1 Section 70(2) of the Town and Country Planning Act 1990 (as amended) sets out that in considering and determining applications for planning permission the local planning authority must have regard to:-
- (a) the provisions of the development plan, so far as material to the application,
 (b) any local finance considerations, so far as material to the application, and
 (c) any other material considerations.
- 6.2 Section 38 (6) of the Planning and Compulsory Purchase Act (2004) makes it clear that any determination under the planning acts must be made in accordance with the development plan unless material considerations indicate otherwise.
- 6.3 The London Plan 2021 is the most up-to-date Development Plan Document for the London Borough of Bromley, and therefore, in accordance with section 38(5) of the Planning and Compulsory Purchase Act 2004, *"if to any extent a*

policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.

6.4 The application falls to be determined in accordance with the following policies:-

6.5 **National Policy Framework (2021) and National Planning Practice Guidance**

6.6 **The London Plan (2021)**

- D1 London's form, character and capacity for growth
- D2 Infrastructure requirements for sustainable densities
- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive design
- D11 Safety, securing and resilience to emergency
- D12 Fire safety
- D13 Agent of Change
- D14 Noise
- S1 Developing London's social infrastructure
- S3 Education and childcare facilities
- G1 Green Infrastructure
- G4 Open space
- G5 Urban greening
- G6 Biodiversity and access to nature
- G7 Trees and woodlands
- SI 1 Improving Air quality
- SI 2 Minimising greenhouse gas emissions
- SI 3 Energy infrastructure
- SI 4 Managing heat risk
- SI 5 Water infrastructure
- SI 6 Digital connectivity infrastructure
- SI 8 Waste capacity and net waste self-sufficiency
- SI 12 Flood risk management
- SI 13 Sustainable drainage
- T1 Strategic approach to transport
- T2 Healthy Streets
- T3 Transport capacity, connectivity and safeguarding
- T4 Accessing and mitigating transport impacts
- T5 Cycling
- T6 Car parking
- T6.5 Non-residential disabled persons parking
- T7 Deliveries, servicing and construction
- DF1 Delivery of the plan and planning obligations
- M1 Monitoring

The relevant London Plan SPGs are:

- Accessible London: Achieving an Inclusive Environment SPG (2014)
- Character and Context SPG (2014)
- Green Infrastructure and Open Environments: The All London Green Grid SPG (2021)
- London Environment Strategy (2018)
- 'Be Seen' energy monitoring guidance (2021)
- Energy Assessment Guidance (2022)
- Mayor's Environment Strategy (2018)
- Control of Dust and Emissions During Construction and Demolition (2014)
- Mayor's Transport Strategy (2018)
- Urban Greening Factor LPG (2023)
- Sustainable Transport and Walking LPG (2022)
- Air Quality Positive LPG (2023)
- Air Quality Neutral LPG (2023)
- Draft Fire Safety LPG (2022)

6.7 **Bromley Local Plan (2019)**

- 27 Education
- 28 Educational Facilities
- 29 Education Site Allocations
- 30 Parking
- 31 Relieving Congestion
- 32 Road Safety
- 33 Access for all
- 34 Highway Infrastructure Provision
- 37 General Design of Development
- 40 Other Non-Designated Heritage Assets
- 55 Urban Open Space
- 60 Public Rights of Way and Other Recreational Routes
- 70 Wildlife Features
- 71 Additional Nature Conservation Sites
- 72 Protected Species
- 73 Development and Trees
- 74 Conservation and Management of Trees and Woodlands
- 77 Landscape Quality and Character
- 78 Green Corridors
- 79 Biodiversity and Access to Nature
- 113 Waste Management in New Development
- 115 Reducing Flood Risk
- 116 Sustainable Urban Drainage Systems
- 117 Water and Wastewater Infrastructure
- 118 Contaminated Land
- 119 Noise Pollution
- 120 Air Quality
- 122 Light Pollution
- 123 Sustainable Design and Construction

- 124 Carbon Reduction, Decentralised Energy Networks & Renewable Energy
- 125 Delivery and Implementation of the Local Plan

The relevant Bromley SPGs are:

- Planning Obligations SPD (2022)
- SPG1 General Design Principles

7 ASSESSMENT

7.1 Principle of development/Land use - Acceptable

- 7.1.1 Paragraph 95 of the NPPF advises that local planning authorities should take a proactive, positive and collaborative approach to meeting sufficient choice of school places advising that they should give great weight to the need to create, expand or alter schools; and work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.
- 7.1.2 Policy S3 (Education and childcare facilities) of the London Plan 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. Part B directs proposals for education and childcare facilities in areas of identified need, in accessible locations with good public transport accessibility and access by walking and cycling and encourages healthy routes and access to the site by locating entrances away from busy roads and links to existing footpath and cycle networks. In addition, new developments should be accessible and inclusive for a range of users, including disabled people, by adopting an inclusive design approach.
- 7.1.3 Policy 27 of the Bromley Local Plan safeguards 'Education Land' for education purposes. Part C of the policy advocates permitting extensions to existing schools which seek to address local need, subject to Local Plan open space and conservation policies, unless there are demonstrably negative local impacts which substantially outweigh the need for additional education provision, which cannot be addressed through planning conditions or obligations.
- 7.1.4 The policy further clarifies that *"in all cases new development should be sensitively designed to minimise the footprint of buildings and the impact on open space, particularly playing fields, as well as seeking to secure, as far as possible the privacy and amenities of any adjoining properties, whilst delivering the necessary educational infrastructure."*
- 7.1.5 The 'Education Land' designation covers the entire site. The extent to which educational development, which has adverse impacts, is afforded support relates to the need/necessity for the provision.
- 7.1.6 The majority of the site is located within land designated as Urban Open Space (UOS), with the exception of the existing school buildings facing St David's

Close. The UOS designation includes the area on which the proposed extensions are to be located, and as such Policy 55 of the Bromley Local Plan is relevant.

7.1.7 Policy 55 permits development related to the existing or allocated use, noting that *“where built development is involved; the Council will weigh any benefits being offered to the community, such as new recreational or employment opportunities, against a proposed loss of open space”*.

7.1.8 The policy also makes specific reference to additional educational buildings advising that;

“Where there is a demonstrable need for additional educational buildings sensitive design and siting will be sought to ensure that the impact on the open nature of the site is limited as far as is possible without compromising the educational requirements.”

Educational Need

7.1.9 The school currently has 182 pupils and 37 members of staff. The recent addition of the temporary structures at the site (granted under planning permission ref: 16/00081/RECON1 and ref: 21/05730/FULL1) provides capacity to accommodate 197 pupils by the 2023-2024 school year.

7.1.10 The current application has been submitted to replace this approved temporary provision and to support further expansion of the school rolls increasing from 1 to 2 forms of entry. This would increase the school pupil capacity to 298 (an uplift of 116 from the existing number of pupils and 101 from the existing capacity), with an increase in staff onsite to 45 (41 Full Time Equivalent (FTE)).

7.1.11 The school buildings do not provide sufficient accommodation for the school as it currently operates, resulting in the need for the provision of the recently approved temporary classrooms. Whilst the class size in private primary schools is a matter for the individual school, the accompanying Planning Statement indicates that the school currently has an average of 16 pupils per class.

7.1.12 The Bromley School Places Plan (2022-26) advises that 58,419 pupils were in Bromley in all types of schools in January 2022, and that the number of pupils in all types of schools in Bromley increased by over 4,000 between January 2016 and January 2022, an increase of 7.4%.

7.1.13 Primary school rolls are currently projected to fall steadily over the next decade although it should be noted that Bromley has seen lower levels of reduction in the need for primary school places than other parts of London.

7.1.14 The accompanying Planning Statement (para 6.15) advises that *“Independent schools contribute to the mix of provision in Bromley and the Primary &*

Secondary School Development Plan notes that the sector grew by 3% between 2015 and 2020". The recent Bromley School Places Plan (2022-26) advises that over the period 2016–2022 independent schools pupils increased by 4% and education colleagues have confirmed the approximation that 9% of all pupils in Bromley attend independent schools.

- 7.1.15 The Planning Statement advises that 80% of St David's School pupils live within 10 minutes of the school and 97% live within 15 minutes, and notes that within a 15-minute travel time catchment area there are 10 other independent schools.
- 7.1.16 Para 5.3.7 of the London Plan (supporting text to Policy S3) references the London School Atlas which gives details of schools and can be filtered e.g. independent & primary and provides basic info on other local independent primary providers and an indication of choice. The London Schools Atlas indicates;
- Within a 40 minute walk - only Wickham Court School (to the south)
 - Within a 50 minute walk - a further 4 schools. However, only the two schools to the North (St Christopher The Hall, and Bishop Challoner) provide similar independent primary provision (Trinity school to the west only takes from 10yr + and Baston House to the East is a specialist autism school.)
- 7.1.17 The applicant commissioned research by educational consultants MTM Consulting, which has been submitted to support the application. The Catchment Analysis Report by MTM states that within the 15 minute catchment area, there are 6,118 children aged 3–4-years and, 19,163 children within the 5–10-year age range.
- 7.1.18 The applicant's advise that their methodology for calculating the pupil yield in these age groups was firstly to understand the realistic catchment area measured from the school boundary and then calculating the total number of households within this catchment, which was derived by consultants MTM from data from the Office of National Statistics using the mid 2020 National Population Projections; which is analysed at an Output Area level, the lowest level of geographical area for census statistics. This produced a total pupil yield for the catchment. Of this total pupil number an assumption of 9% of the total that would be educated at independent schools was applied of the total pupils in the same catchment.
- 7.1.19 For the age 3-4 year range, the applicant's analysis uses the 9% modelling assumption as a starting point, and states that approximately 550 would be expected to use an independent school. Their catchment analysis indicates that the latest numbers are 494 pupils that use private schools within the catchment (suggesting a current proportion of 8% and potential growth for at least a further 55 pupil places). St David's currently provides for approximately 10% of places in this age range and school's projections are forecasting growth by roughly 15 places up to 2026/27.

- 7.1.20 For 5–10-year age range, the applicant’s analysis states that using the 9% modelled assumption, 1,724 would be expected to use independent schools. The catchment analysis for age 5-10yrs demonstrates 1,923 pupils using private schools. Although the applicant’s analysis states that this number “*is skewed by the number of other independent schools in this catchment area (and would reduce were a wider catchment area used)*”. St David’s Prep provides for approximately 7% of these places at present but the school’s projections are forecasting growth by approximately 69 places in this age range up to 2026/27. This would increase its proportion of 5-10 year old pupils within the catchment area to 11%.
- 7.1.21 The supporting information also highlights significant enquiries and waiting list for places at the school, noting in para 6.20 of the Planning Statement that the school receives approximately twelve enquiries a week from parents requiring school places but has to reject a significant proportion of these due to lack of capacity. The proposed changes in this application would help to meet this requirement and are representative of actual demand.
- 7.1.22 Table 4 within the supporting Planning Statement indicates 8 current class groups; Nursery, Reception, Yrs 1-6, and Specialist¹. Of those class groups 4 are already provided to two forms (Reception and Yrs 1-3). As these 2 form groups move up through the age groups, additional classrooms would be required, with pressure reaching a need for 7 classrooms in 2025/26 as the permission for the temporary buildings expires.

Classrooms Required	AY22/23	AY23/24	AY24/25	AY25/26	AY26/27
Nursery	1	1	1	1	1
Reception	2	2	2	2	2
Year 1	2	2	2	2	2
Year 2	2	2	2	2	2
Year 3	2	2	2	2	2
Year 4	1	2	2	2	2
Year 5	1	1	2	2	2
Year 6	1	1	1	2	2
Specialist ²	1	2	2	2	2
Total	13	15	16	17	17
Shortfall (if planning permission not approved)	0	-2	-4	-7	-7

Fig.10 – Table 4 of Planning Statement: St. David’s Prep Required Classroom Provision to 2026-27 and Shortfall (if planning permission is not approved).

- 7.1.23 The six proposed new classrooms within Block A would be 40sqm and the two within Block B would be 34.3sqm. The size of the hall space would also be increased to meet area guidelines for state schools as set out in DfE guidance

¹ The Planning Statement advises that ‘Specialist’ refers to a room used for music or STEAM (Science, Technology, Engineering, the Arts and Mathematics) which require greater set-up time/create more mess and so are unsuitable for reversion to a normal classroom at the end of a lesson and that these rooms are also used for SEN teaching.

BB103 and to improve accessibility in line with Part M Building Regulations. Whilst independent schools are not required to meet the DfE guidance in terms of classroom size, taking account of this guidance for state schools as well as the average number of pupils suggested within each class, the classroom sizes would appear appropriate.

7.1.24 The proposal also includes the provision of an additional Specialist classroom at the school (resulting in 2 in total) for use as a computer science room. The provision of 2 Specialist classrooms for an independent school of this size may be considered reasonable.

Retention of existing building

7.1.25 This application also involves the retention of the existing single storey detached building (labelled as Building 2 in Fig. 11 below) which fronts St David's Close for an additional temporary period. The roof is also proposed to be replaced.

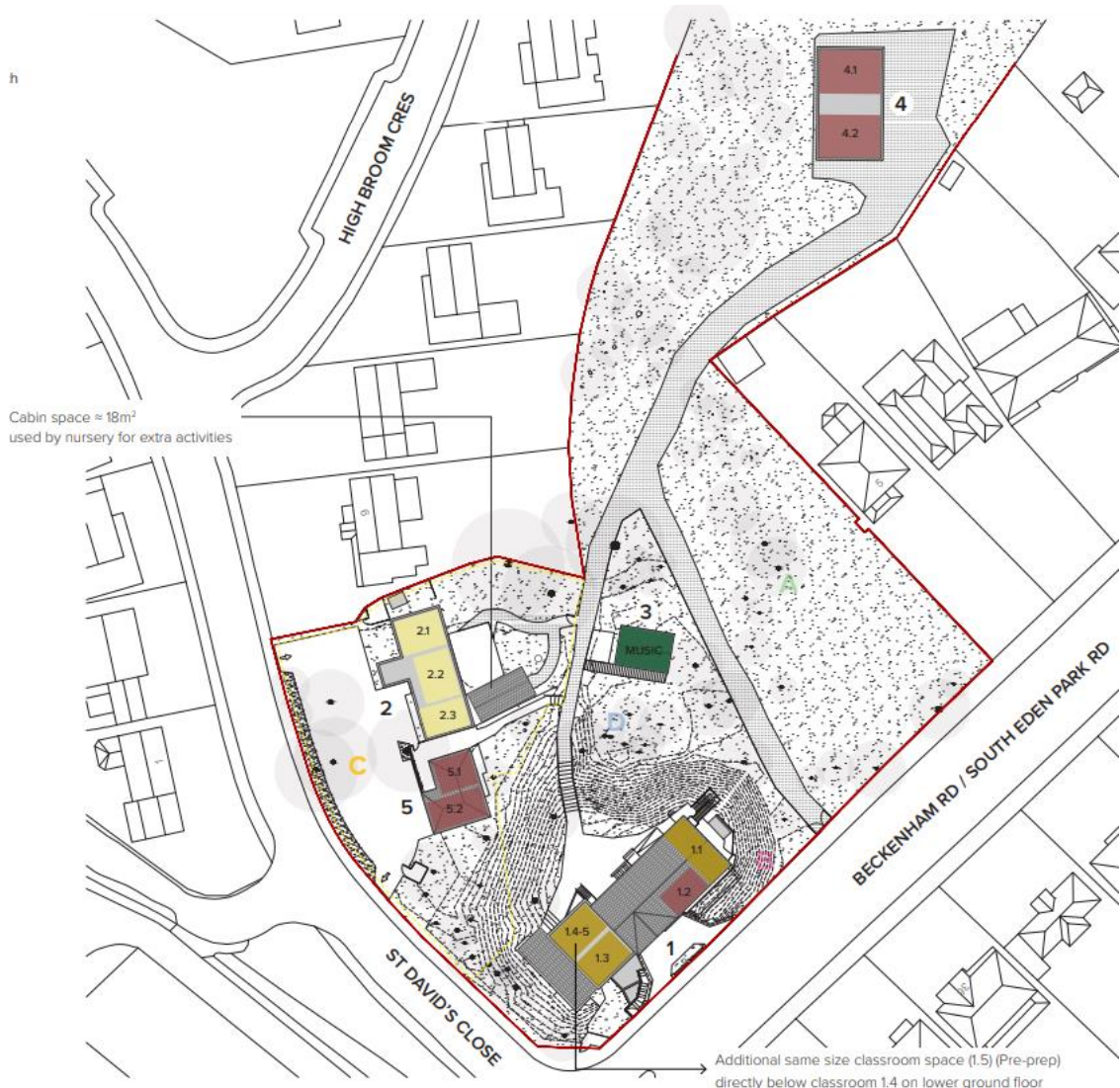


Fig.11 – Existing School Building Layout

- 7.1.26 This building has been in situ since the late 1960s when it was originally granted permission under ref: 19/67/2017. Condition (ii) of this permission allowed for temporary permission only for a limited period of ten years. Since this application a number of subsequent renewal applications have been submitted and approved to allow its temporary retention, the most recent being application ref: 14/00472/RECON which included a condition (2) stating that the building hereby permitted shall be removed and the land reinstated to its former condition on or before the 31/05/19.
- 7.1.27 This current development proposes a further temporary retention of this building for a period of five years to continue the provision of three classrooms for the Early Years Foundation Stage (EYFS).
- 7.1.28 The application documents indicate that a future phase (Phase 2) of the school's redevelopment will look to replace the EYFS block (labelled as Building 2 in Fig. 11 above) and the adjacent buildings (labelled as Building 5 and 'cabin space' located to the rear of Building 2 in Fig. 11 above) within this five year period to higher standard, modern buildings with landscaping to match the quality of the proposals included within the current submission. Furthermore, by phasing the redevelopment as proposed this would allow the decant of existing classrooms so that the school can still function as indicated and no further temporary structures would need to be provided.

1.4 Phasing Overview



Fig.12 – Phasing Overview

- 7.1.29 The applicant's Additional Information document (REV B 10th July 2023) provides an indicative plan for Phase 2 (Block C) indicating how up to an additional 9 classrooms could be provided through the future redevelopment of the EYFS block and adjacent buildings. The document outlines that the detail of these Phase 2 proposals would be provided in a subsequent planning submission and will ensure the minimum impact on the green spaces whilst securing the privacy of adjoining properties.

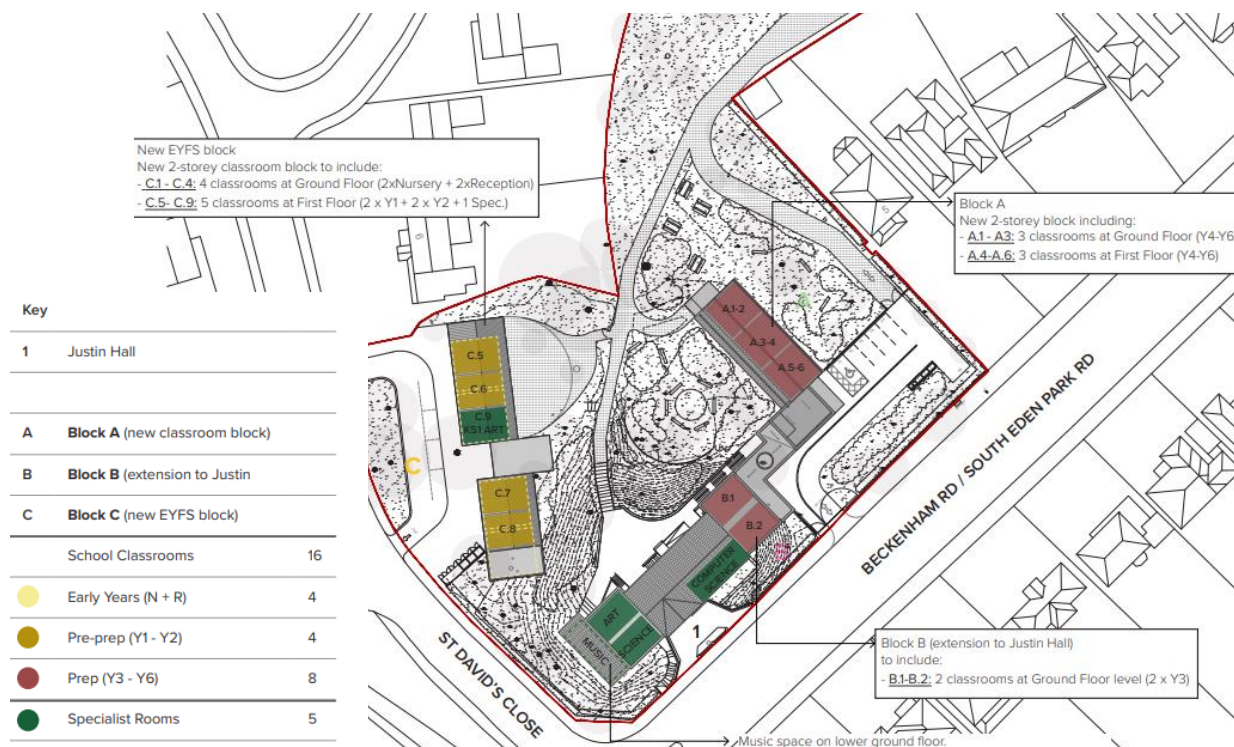


Fig.13 – Proposed Masterplan Phase 2 (subject to subsequent planning application)

- 7.1.30 As part of Phase 2, the new classrooms within Block C would serve Nursery, Reception, Year 1 and Year 2 as well as a specialist Key Stage 1 room. The existing classrooms within Justin Hall are then also indicated to be repurposed into Specialist Rooms to provide dedicated spaces for art, science, computer science and for SEN use. As a result of Phase 1 and Phase 2 a total of 21 classrooms would be provided (2 per year group and 5 Specialist Rooms).
- 7.1.31 The applicant has advised that the Phase 2 proposals are subject to further design work and as such have not been included within this current application.
- 7.1.32 Consideration of the appropriateness of any redevelopment of this part of the site would need to be assessed in full as part of any future formal application. Nevertheless, the document indicates that as part of Phase 2 there would not be any increase in the capacity of the site beyond that outlined within this planning application.
- 7.1.33 As stated above, the retention of the existing temporary EYFS building is included as part of this current application to allow the provision of a total of 17 classrooms on site as a result of Phase 1 which would provide the capacity for 1 form for Nursery, 2 forms per school year group and 2 Specialist rooms (as indicated above).
- 7.1.34 Unlike the remainder of the site, this existing temporary building does not lie within land designated as Urban Open Space. Nevertheless, consideration of

its retention and the impact of that on the wider redevelopment of the site and on its surrounds still needs to be considered.

- 7.1.35 The building has been in place since 1967 and currently provides classrooms for Nursery and Reception. This would continue as part of the additional temporary permission for a period of 5 years.
- 7.1.36 Taking this into account, it is considered that a further temporary permission for a period of 5 years would be appropriate to allow further plans to come forward for an appropriate replacement, whilst in the interim still providing the classrooms demonstrated as required to allow for the increased capacity at the school.

Conclusion

- 7.1.37 To meet the increased capacity for the school the application proposes new built development on land which is designated as UOS. As highlighted above, Policy 55 of the Bromley Local Plan states that where there is a demonstrable need for additional educational buildings sensitive design and siting will be sought to ensure that the impact on the open nature of the site is limited as far as is possible without compromising the educational requirements.
- 7.1.38 Taking account of all the above, it is considered that there is a demonstrable need for the ongoing use of this existing building with expired permission and the proposed additional educational buildings to cater for children already on the school roll and to meet future expansion.
- 7.1.39 Furthermore, whilst the proposed new buildings would be sited on land designated as UOS, rather on the part of the site not designated as UOS currently occupied by an existing temporary building and adjacent cabins, the application documents provide clear reasoning as to why the retention of the existing building in this location is required for a further temporary period rather redevelopment at this stage; being that there is clear intention for the redevelopment of the part of the site not located within UOS as part of a subsequent phase of development (Phase 2). This would improve the facilities at the school in line with the increased capacity proposed under this current application and will allow the school to continue to function during the construction process of the proposed new buildings as part of this application (Phase 1).
- 7.1.40 In addition, the new buildings proposed under this current application would also replace the classroom space currently provided by the other existing temporary buildings on site, labelled as Building's 3 and 4 in Fig. 11 above, which currently have temporary permission until 1st May 2024 and 1st April 2025 respectively, and which are also located within the UOS designation. The removal of these buildings would also be required by way of a condition on any approval.
- 7.1.41 In terms of the design and siting of the proposed development to ensure that the impact on the open nature of the site is limited as far as is possible without

compromising the educational requirements, this is considered fully within Section 7.2 below.

Impact on outdoor recreation

- 7.1.42 Policy 58 Outdoor Sport, Recreation and Play of the Bromley Local Plan states the Council seeks to retain sports, recreation and playing fields and will resist their loss unless it can be demonstrated that the open space, buildings and other land used for sport, recreation and play are surplus to requirements.
- 7.1.43 The proposed development is sited away from the existing playing fields and outdoor recreation space. However, the proposal involves the provision of replacement teaching space which is currently provided through the two temporary classrooms located on an area of hardstanding previously used for outdoor recreation (labelled as Building 4 in Fig. 11 above). As part of the assessment of these temporary classrooms under application 21/05730/FULL1 consideration was made as to the temporary nature of the development and it was considered that the location of the building on this hard-surfaced play area would be acceptable to be repurposed on a short term basis. The removal of this building will restore the area of hardstanding used for the temporary block to outdoor recreation which is a positive benefit of the development. As stated above, its removal would be required by way of a condition on any approval.

7.2 Design, Scale and Layout - Acceptable

- 7.2.1 Paragraph 126 of the NPPF (2021) states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 7.2.2 London Plan and Bromley Local Plan policies further reinforce the principles of the NPPF setting out a clear rationale for high quality design.
- 7.2.3 Policy D3 of the London Plan relates to 'Optimising site capacity through the design-led approach' and states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. Form and layout should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape. The quality and character shall respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character.
- 7.2.4 Policy 37 of the Bromley Local Plan requires a high standard of design and layout in all new development which should complement adjacent buildings and areas and positively contribute to the existing street scene and/or landscape and respect important views, heritage assets, skylines, landmarks

or landscape features. Space about buildings should also provide opportunities to create attractive settings with hard or soft landscaping (including enhancing biodiversity) and should allow for adequate daylight and sunlight to penetrate in and between buildings. Suitable access should also be provided for people with impaired mobility and meet the principles of inclusive design. In addition, Policy 37 highlights that development proposals should also respect non designated heritage assets and should be accompanied by a written statement setting out design principles and illustrative material showing the relationship of the development to the wider context.

Heritage

- 7.2.5 Paragraph 040 of the Planning Practice Guidance (PPG) confirms that, as well as identification of non-designated heritage assets through the preparation of local lists, in some cases local authorities may also identify non-designated heritage assets as part of the decision making process on planning applications.
- 7.2.6 Policy 40 of the Bromley Local Plan (Other Non-Designated Heritage Assets) sets out that where non-designated heritage assets are highlighted as at risk of harm from a planning application, clearly demonstrable reasons or evidence of their significance will be required. Where the Council agrees that such assets are worthy of protection, proposals to replace such buildings will be assessed against paragraph 203 of the NPPF (2021), taking into account the scale of harm or loss and the significance of the heritage asset.
- 7.2.7 Paragraph 203 (NPPF) sets out that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 7.2.8 The Council's Conservation Officer has advised that Justin Hall is a post 1930s building that displays attractive Flemish bond brickwork with some decorative features shown in brick such as decorative rusticated brick piers and an attractive semi-circular brick arch above the main entrance. Therefore, it is considered that this building is a cherished part of the local historical character of the area.
- 7.2.9 Paragraph 11 of the Historic England guidance on identifying and conserving local heritage states that heritage interests as defined in the PPG can inform the development of the criteria which are important in providing a sound basis for a local heritage list. In this instance of note are;

“Architectural and artistic interest: ‘These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design,

construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.'

Historic interest: 'An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.'

- 7.2.10 The Council's Conservation Officer has advised that they consider Justin Hall displays both architectural and artistic interest and historic interest and is therefore a non-designated heritage asset.
- 7.2.11 In respect of the impact of the proposed scheme on this non-designated heritage asset, Justin Hall, this proposed scheme would add a new extension which would be subservient to the existing building and set back so as to not interfere visually with the non-designated heritage asset. The proposed scheme would also add a new block, which given its siting, would also be subservient to the non-designated heritage asset. There is therefore no objection to this scheme from the heritage point of view in so far as the proposal would have limited impact on the significance of non-designated heritage assets.

Layout

- 7.2.12 The existing layout comprises of a collection of low-quality buildings, structures, and temporary classrooms introduced as piecemeal interventions on an ad-hoc basis over time. The opportunity to improve the appearance of the site and the way in which it functions with regard to the configuration of buildings, landscape design, access and circulation as part of a wider masterplan approach is welcomed.
- 7.2.13 The design intent to minimise the footprint of the buildings in order to reduce the impact on the landscaped setting is noted, and the intention to retain the existing shared open space in the heart of the site for activities and play framed by buildings is considered to be the right approach. It is also noted that the current scheme allows for the potential redevelopment of the existing nursery/pre-prep classroom buildings (fronting St David's Close) as part of a future phase.
- 7.2.14 The siting and footprint of Block A, which provides a separation distance of approximately 19m from the closest neighbouring properties in South Eden Park Road, is supported as this would reduce both the visual impact and the tree impact. The siting and footprint of the proposed extension to Justin Hall (Block B) appears consistent with, and proportionate in size to, previous extensions and would appear subservient to the original school building.

- 7.2.15 The merits of introducing a covered canopy structure linking Blocks A and B are noted, as the link will aid circulation and legibility between blocks and provide a greater sense of enclosure to the shared open green space. The application documents confirm that the new pedestrian access point which leads to the new link entrance would be primarily for the older children accessing the classrooms and that visitors would still enter the school via the existing Justin Hall entrance. Therefore, the link structure would provide an important space threshold and transitional space between buildings rather than forming a main entrance.
- 7.2.16 The siting, access and configuration of the car parking area fronting Beckenham Road represents an appropriate and proportionate response to the site.
- 7.2.17 The proposed new refuse store would be located to the north-eastern corner of the site, but would be set back from the frontage and enclosed within a timber clad structure to help minimise the impact on the streetscene.

Scale & Massing

- 7.2.18 The aspiration to retain a general sense of openness across the site is noted; nevertheless, the siting and scale of Block A would represent a significant addition to the open landscape. However, the need to balance the protection of urban open space with the requirement to expand teaching accommodation is acknowledged. Therefore, the proposed scale and height of Block A (2 storey) is considered appropriate in response to neighbouring low-rise residential properties and the surrounding context. Furthermore, the height of Block A would not exceed the ridgeline of Justin Hall.

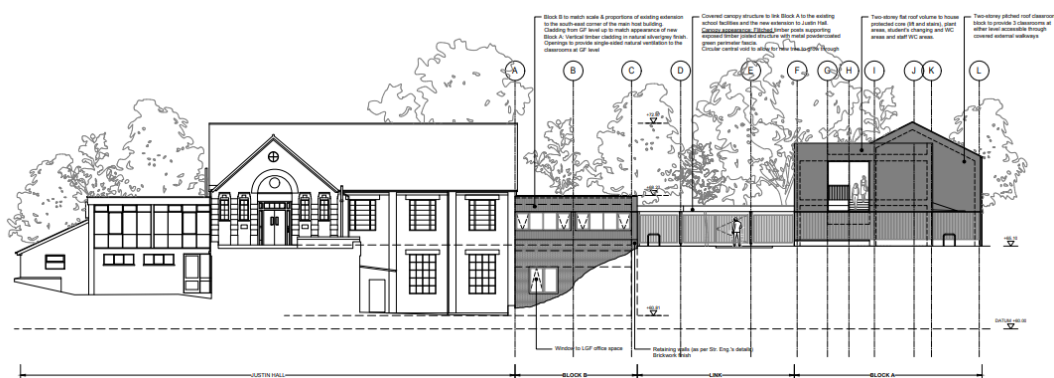


Fig.14 – Proposed Elevation fronting Beckenham Road

- 7.2.19 The rationale for splitting Block A into 2 separate volumes and creating external walkways to reduce the perceived scale and appearance of mass is accepted. Whilst the flat roof element would feature a raised parapet resulting in a slightly awkward relationship with the pitched roof form of the adjoining classroom block, it is acknowledged that this is due to a need to conceal the lift overrun in accordance with building regulations requirements whilst keeping the ridge height of the overall building at the same height as the

existing main school building. The rationale for this design is therefore accepted.

- 7.2.20 Whilst two storeys in height, given the topography of the site, the extension to Justin Hall (Block B) would read as single storey from the streetscene and subservient to Justin Hall. The scale and height is therefore considered to be acceptable.

Appearance

- 7.2.21 The design intent for the proposed new building (Block A) to blend into the woodland setting using traditional forms and sympathetic materials whilst retaining a contemporary character is supported. The use of natural materials such as timber cladding alongside generous expanses of glazing will help to soften the appearance of the building, the concept of introducing open deck walkways as opposed to sterile internal corridors in order to maximise engagement with the unique outdoor surroundings also has merit. To ensure the quality of external materials, a condition requiring samples to be submitted and approved prior to above ground works is considered necessary and reasonable on any approval.



Fig.15 – 3D Visualisation (from Design and Access Statement)

- 7.2.22 The design intent for Block B (the extension to Justin Hall), which would include brick to match Justin Hall to the lower storey and vertical timber cladding to the upper storey to match Block A, is considered to appropriately complement the existing building as well as link to the proposed new development and woodland setting.

- 7.2.23 The design/appearance of the link structure between Blocks A and B would include timber posts with a metal fascia to link with the metal railing and stair and to aid durability which is considered to be appropriate.

Landscape

- 7.2.24 The site has a distinct character derived from its natural woodland setting, the overarching aim to retain the existing qualities of the site whilst allowing for expansion and being sympathetic to the surroundings is supported. It is understood that a number of trees reaching the end of their life have recently been removed (22/02143/TPO) and that the majority of existing trees are in terminal decline, the need to reinvent the landscape strategy of the school is therefore accepted.
- 7.2.25 Whilst it is unfortunate that the extent of the existing wooded character has diminished, the opportunity to redesign the site utilising its natural characteristics and level changes is acknowledged. The landscape masterplan proposals which include extensive new tree planting, green buffers fronting Beckenham Road and the northern site boundary, structural planting, a central outdoor teaching and play space, reconfigured pathways, and improved accessibility are supported in principle. Detailed consideration on the impact on existing trees and associated habitat/biodiversity matters within the site, as well as the proposed landscape enhancements will be assessed within the following section (7.3) of the report.

Fire safety

- 7.2.26 The matter of fire safety compliance is covered by Part B of the Building Regulations. However, to ensure that development proposals achieve highest standards of fire safety, reducing risk to life, minimising the risk of fire spread, and providing suitable and convenient means of escape which all building users can have confidence in, applicants should consider issues of fire safety before building control application stage, taking into account the diversity of and likely behaviour of the population as a whole (London Plan Policy D12).
- 7.2.27 The supporting Fire Statement v.1 Rev.A (25.01.23) prepared by 3-FE and accompanying fire strategy drawings meets the requirements of Policy D12. Compliance to the fire statement will be conditioned however, compliance with the Building Regulations will still be required at the appropriate stage of the development.

Secured by Design

- 7.2.28 Supporting paragraph 3.3.14 of Policy D3 of the London Plan states development should reduce opportunities for anti-social behaviour, criminal activities, and terrorism, and contribute to a sense of safety without being overbearing or intimidating. Developments should ensure good natural surveillance, clear sight lines, appropriate lighting, logical and well-used routes and a lack of potential hiding places. This approach is supported by Policy

D11 of the London Plan (Safety, security and resilience to emergency) and Bromley Local Plan Policy 37 (General Design of Development).

7.2.29 The Designing Out Crime Officer (DOCO) has advised that they have met with the project architects and have reviewed the submitted documents, which mention Secured by Design. A development such as this, with access into the interior and for the benefit and safety of future staff, pupils, visitors and their property, should fully incorporate the aims and principles of Secured by Design to reduce opportunities for criminal activity. The DOCO has advised that the proposal will be able to achieve the security requirements of Secured by Design with some modification, and with the guidance of Secured by Design officers. As such, an appropriate two-part condition should be included on any approval requiring the principles and physical security requirements to be dealt with pre-commencement and the Secured by design accreditation achieved prior to occupation.

7.3 **Green Infrastructure and The Natural Environment - Acceptable**

7.3.1 Paragraph 174 of the NPPF (2021) outlines that planning policies and decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. This is reflected in the Valued Environments Policies of the Bromley Local Plan and within Chapter 8 of the London Plan.

Biodiversity and Protected Species

7.3.2 London Plan Policy G6 (Biodiversity and access to nature) Part D requires development proposals to manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

7.3.3 Policy 72 (Protected Species) 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.

7.3.4 The site has no particular ecological designations, but does comprise Urban Open Space and a TPO covers much of the site. According to GiGL the site itself is not considered to be a biodiversity hotspot (i.e. likely to contain protected species, sites or habitats). However, the land to the west and east is considered to have a higher value with wildlife links along the railway to the east and High Broom Wood to the west (which is a SINC site of Metropolitan Importance). There are no particular species records of note, although stag beetles have historically been recorded towards the west of the site. The site therefore provides a good opportunity to enhance habitat links in the area and to provide a contribution towards the nature recovery network.

- 7.3.5 The application is supported by a Phase 1 Preliminary Ecological Appraisal (PEA) (April 2023) prepared by David Archer Associates. The PEA was undertaken on 20th October 2022, which is outside of the optimal season for botanical work. However, this is acknowledged in Chapter 3.6 of the report - Limitations and Assumption which states that 'the habitat descriptions and evaluations are considered to be accurate due to the common and widespread habitats recorded and the vegetation being clearly visible at the time of survey'.
- 7.3.6 It is noted that comments received from the Orpington Field Club & Bromley Biodiversity Partnership Sub-Group raise concerns about the potential for the site to be relict ancient woodland. However, the applicant's ecology consultant submitted a letter dated 13th March 2023 to address these concerns. The applicant's ecologist considers ancient woodland status to be unlikely, citing 1) the separation between the site and High Broom Wood SINC (ancient woodland), 2) the presence of indicator species not necessarily equating the ancient woodland due to natural migration, and 3) the PEA autumnal timing would not necessarily have made it unlikely that indicator species could be recorded.
- 7.3.7 The site has not been classified by Natural England as Ancient Woodland and the justification provided by the applicant's ecologist is reasonable. Further, the accompanying Biodiversity Net Gain (BNG) Assessment, for which an additional survey of the site was undertaken on 20th March 2023, includes the Condition Assessment sheets of the woodland between the site and the Ancient Woodland and concludes that the woodland here is also not Ancient.
- 7.3.8 It is considered that the importance of the woodland has been classified in both the accompanying PEA and BNG Assessment, and the BNG report also provides information about how net gains will be achieved in respect of woodland. The distance between the proposed works and the SINC (100m) is also considered to be sufficient for there to be no direct or indirect impacts and the proposed woodland planting, as part of the BNG calculations, will also help improve the ecological networks in close proximity to the SINC.
- 7.3.9 In respect of protected species, the PEA does reference that Justin Hall (Building B1) has low suitability for supporting bats. This building will be retained and page 17 of the PEA states *"The proposed works include a flat-roofed extension (labelled Block B in the proposed plans) to the north-west of Building B1, which is proposed to join at existing eaves height. As such, the extension will be far enough from any potential roost features, which are the lifted roof tiles on the south-western roof elevation and the mortar gap near the ridge at the north-western end of the roof, for roosting bats to be directly impacted."* On the basis that there will be no roof works to this existing building, there would not appear to be any requirement for a presence/absence survey.
- 7.3.10 Within Section 5 of the PEA, a number of recommendations for further surveys, mitigation and enhancements are also provided. This includes a requirement for a pre-clearance badger survey. It is clarified that although no badger setts were recorded within the site, as badger setts can appear at any

time where suitable habitat has been identified, a badger survey on and within 30m around the site around six weeks before clearance/construction begins is recommended to allow time for any mitigation/avoidance measures to be designed, and preparation of a Natural England badger Development Licence application if required.

- 7.3.11 The PEA also makes recommendations in respect of appropriate measures to protect stag beetles, birds, hedgehogs, and other mammals during the building and vegetation clearance. Taking this and the need for a pre-clearance badger survey into account, a condition requiring the submission of a Pre-Clearance strategy (to include the pre-clearance badger survey) prior to any works being undertaken on-site is considered necessary and appropriate on any approval to safeguard the interests and wellbeing of protected species and all other wildlife.
- 7.3.12 It is also noted that the applicant's PEA refers to the need for a sensitive lighting strategy and details of this would also be required by way of a condition on any approval.
- 7.3.13 This would be in addition to conditions a Landscape Ecological Management Plan (LEMP)

Biodiversity Net Gain (BNG)

- 7.3.14 The application is supported by a Biodiversity Net Gain (BNG) assessment (April 2023) REV A 30.06.23 prepared by David Archer Associates and an accompanying DEFRA Biodiversity Metric version 4.0.
- 7.3.15 The BNG Assessment outlines that the on-site habitats for the purposes of BNG has been confined to the development zone (being the area on which the existing and proposed built development is located) with the area to the rear of the properties on South Eden Park Road and St. Davids Close/High Broom Crescent (but still within the application site boundary and ownership of the applicant) being detailed as off-site and available for further habitat enhancements. This is shown in Fig.10 below (shown as Fig.3.1 within the BNG assessment (April 2023)). The reasoning for this approach is outlined within paragraph 3.2 of the BNG Assessment and is considered acceptable in this instance to ensure the trading rules in relation to the BNG are satisfied.

Figure 3.1: Proposed development area (red line) and off-site area considered for BNG enhancements (blue line). Note the blue in the top right corner is part of the base map and is an off-site astro turf pitch; it is not part of the blue line off-site area used in this BNG assessment.



Fig.16 – On-site habitat area in red and off-site habitat area in blue as per BNG assessment (April 2023)

- 7.3.16 The BNG assessment and metric records a BNG of +92.89% (1.20 habitat units) on-site (within the area outlined in Fig.10 above in red). According to the PEA and Metric details submitted, the site hosts mainly medium distinctiveness habitat. Under the 'Trading Summary', medium distinctiveness woodland and forest will be replaced by urban trees and grassland and whilst this achieves a project-wide gain, the Metric records a trading fail in this regard as a like-for-like or like-for-better habitat will not be provided. In order to meet these trading rules, habitat creation and enhancements are also proposed in 'off-site' land (shown outlined in blue in Fig.10 above) within the applicant's ownership and with direct connectivity to the site resulting in the addition of 2.24 habitat units 'off-site'. Therefore, overall when combining the on-site and off-site habitat calculations, a BNG of +133.90% would be achieved, and all trading rules satisfied.
- 7.3.17 It is acknowledged that the site underwent some clearance work, including the removal of trees, prior to the submission of this planning application. In respect of the baseline habitat, the applicant's BNG Assessment acknowledges that some areas of the site had been subject to recent tree felling activities at the time of the Preliminary Ecological Appraisal survey, and confirms that where this had occurred, a precautionary approach was applied whereby the baseline habitats and likely conditions were taken to be from the date of 17th October 2022 (one day prior to tree felling commencing) using aerial imagery and adjacent retained habitats to determine a 'likely worst-case scenario', with higher value habitats and conditions assigned where any potential ambiguity occurred.
- 7.3.18 The proposed net gains and habitat enhancements will need to be carefully managed and monitored and this would be secured by way of appropriate conditions on any approval to ensure they are achieved. A scheme of biodiversity enhancements to include enhancements targeted at specific species and/or groups of species, such as bats, birds and insects, as outlined

within the applicant's PEA, and highlighted by both the Orpington Field Club & Bromley Biodiversity Partnership Sub-Group and the RSPB, would also be required by way of a condition on any approval to help mitigate the loss of existing habitat.

Trees, Landscaping and Urban Greening

- 7.3.19 Policy G7 of the London Plan and Policy 73 of the Bromley Local Plan seek to ensure that, wherever possible, existing trees of value are retained and if planning permission is granted that necessitates the removal of trees there should be adequate replacement.
- 7.3.20 Policy G5 (Urban Greening) of the London Plan outlines that major development proposals should contribute to the greening of London by including urban greening by including urban greening as a fundamental element of site and building design.
- 7.3.21 Policy 74 of the Bromley Local Plan seeks to improve the amenity and conservation value of trees and woodlands and Policy 77 of the Bromley Local Plan also seeks to safeguard the quality and character of the local landscape; and seek the appropriate restoration and enhancement of the local landscape through the use of planning obligations and conditions.
- 7.3.22 The site is partially covered by an area TPO. The Council's Tree Officer has advised that permission for removal of a number of TPO trees at the site was granted under ref: 22/02143/TPO.
- 7.3.23 A further 9 nine trees are proposed to be removed as part of this current planning application to facilitate the proposed development, as indicated within the supporting Tree Survey Arboricultural Integration Report (30.11.22) prepared by Quaife Woodlands. The Council's Tree Officer has stated that they raise no objection to the removal of these additional trees. However, a landscaping condition to ensure adequate replacement tree planting is recommended. A condition requiring tree protection measures in accordance with the submitted tree protection plan to protect retained trees on site is also recommended on any approval.
- 7.3.24 The application is also supported by an Urban Greening Factor Plan which indicates how an Urban Greening Factor (UGF) of 0.58 will be achieved on site. This would exceed the minimum 0.3 required under Policy G5 for this type of development. It is noted that the UGF plan only includes the area of the site on which the development is proposed, rather than covering the whole site which includes the playing fields and vegetated area to the rear. The inclusion of only the developed part of the site is considered appropriate in this instance.
- 7.3.25 The Urban Greening Factor Plan includes the proposed area coverage for each surface cover type (e.g. trees, hedges, different types of planting) but does not include full details of species. The recommended landscaping condition, as outlined above, would also need to provide full details of the

location and types of species/material of all hard and soft landscaping in compliance with the details indicated on the submitted UGF plan.

7.4 **Transport and Highways - Acceptable**

- 7.4.1 Paragraph 105 of the NPPF requires significant development to be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.
- 7.4.2 Policy T1 of the London Plan advises that development proposals should facilitate the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041.
- 7.4.3 Policy T4 of the London Plan requires development proposals to reflect and be integrated with current and planned transport access, capacity and connectivity. Transport assessments/statements are required to accompany development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance. Development proposals should also not increase road danger.
- 7.4.4 The application is supported by a Transport Assessment (December 2022) prepared by TTP Consulting.

Access

- 7.4.5 At present vehicular access to the school is mainly taken from St David's Close, where an area of hardstanding is served by separate points of entry and exit at the southern point of the site. This area provides for approximately 12 cars.
- 7.4.6 There is also a secondary point of vehicular access to the site from Beckenham Road, which is currently used by grounds maintenance staff to access the school's playing fields. It is proposed to widen this existing access from Beckenham Road to provide vehicular access to the site and to the 6 new additional car parking spaces proposed as part of the development. Maintenance access only to the school's playing fields would be provided by way of a new access path along the north-west of the site.
- 7.4.7 The vehicular access to the new car parking areas provides sufficient visibility for drivers emerging from the site of pedestrians on the footway and vehicles on Beckenham Road.

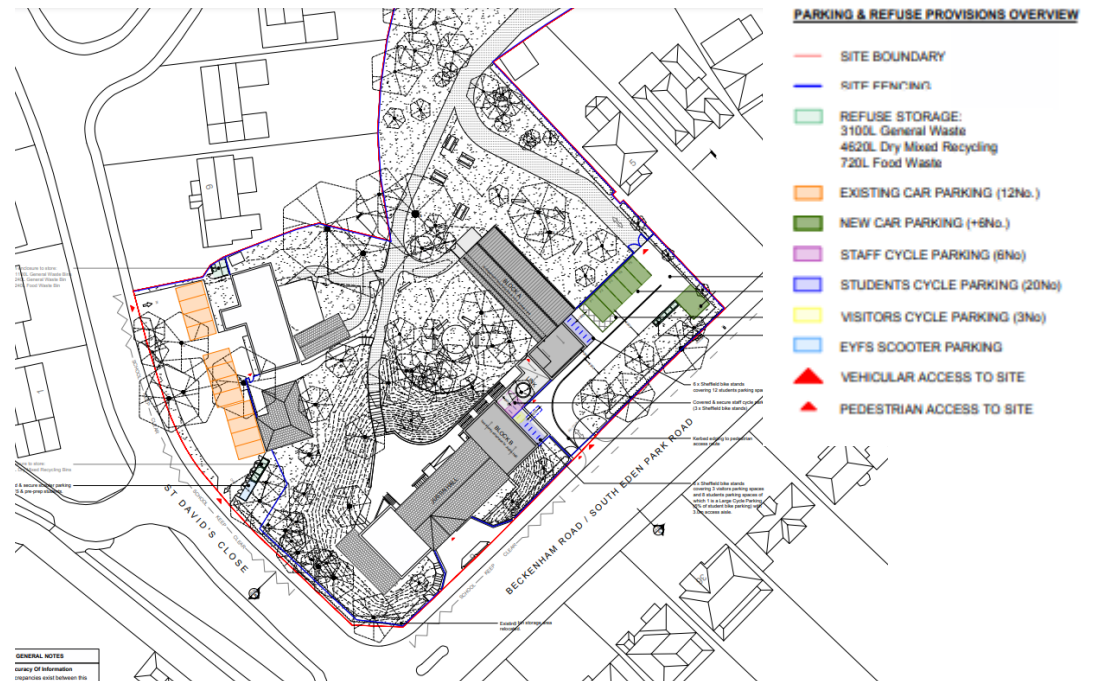


Fig.17 – Parking and access arrangements

7.4.8 At present the majority of pupils access the site from St. David's Close, with one year group using the pedestrian access point on Beckenham Road. The development proposals will provide a new pedestrian entrance to the school adjacent to the access to the new staff parking area. The new access will enable pupils to enter and exit the school at three points so as to distribute activity more evenly around the site. It is proposed that Years 3 to 6 will use the new point of access.

Trip Generation and Impact on Local Highway Network

7.4.9 A number of concerns have been raised locally with regards to the impact of the proposed increase in staff and pupils numbers on parking capacity within surrounding roads and traffic implications at school drop off and pick up times.

7.4.10 Policy 31 of the Bromley Local Plan states that any new development likely to be a significant generator of travel:

a - should be located in positions accessible or capable of being made accessible by a range of transport modes, including public transport, walking and cycling;

b - will require the submission of a Transport Assessment, setting out the impacts of their development on the local transport network (and strategic road network where applicable) and the mitigation measures proposed to deal with the impacts;

c - will, where necessary, be required to enter into an agreement to submit and implement acceptable Travel Plans, Construction Logistics Plans, and Delivery and Servicing Plans;

d - will need to incorporate or contribute to improvements to the highway network including traffic management measures that limit the significant impacts of the development and are designed to be sensitive to the surroundings; and

e - encourages walking and cycling through the provision of suitable facilities.

7.4.11 The accompanying Transport Assessment (December 2022) indicates that the school has staggered start and end times so as to reduce peak levels of activity when pupils arrive and depart from school. The school also has an early room and late room to provide before and after school care. The early room operates from 7:45am and the late room operates until 6:00pm. Before and after school clubs operate most days with pre-school clubs starting from 7:45am and after school clubs ending between 4:30pm and 5:00pm. These activities help reduce the level of movement to and from the site during peak periods.

7.4.12 To determine the modes of transport used by pupils and staff, questionnaire surveys were undertaken in November 2022; a summary of the results are included within Table 2.2 of the Transport Assessment (December 2022).

Travel Mode	Pupils		Staff	
	Number	Percentage	Number	Percentage
Walking	20	11.0%	4	12.1%
Scooting	12	6.6%	0	0.0%
Cycling	7	3.8%	1	3.0%
Rail/Overground	0	0.0%	0	0.0%
Tube	0	0.0%	0	0.0%
Public Bus	0	0.0%	4	12.1%
School Bus/Taxi	0	0.0%	0	0.0%
Car/Motorcycle	93	51.1%	24	72.7%
Car Share	50	27.5%	0	0.0%
Total	182	100.0%	33	100.0%

Fig.18 – Summary of results of existing travel modes survey (November 2022)

7.4.13 The surveys indicate that the majority of pupils and staff travel to the site by car with 93 pupils being driven as the sole passenger travelling to the school and 50 car sharing with other pupils. On the basis that the average number of pupils car sharing in each vehicle is two, at present, it is estimated that in the order of 118 cars make trips to and from the school each day to drop off and collect pupils.

7.4.14 The surveys indicate that 24 staff members currently drive to the site. On the basis that 12 staff are able to park on site, up to 12 staff cars could be parked on street in the vicinity of the school per day.

7.4.15 To establish the change in demand for on-street parking when pupils are being dropped off and collected, parking beat surveys were undertaken on Wednesday 28th September 2022. The surveys recorded the number of vehicles parked, and the space available for additional cars to park on street within a 500-metre walk of the site. The counts took place at 5-minute intervals between 8:00am - 8:50am and at 5-minute intervals between 3:00pm –

3:50pm. Table 2.4 of the Transport Assessment (December 2022) shows the maximum increase in vehicles parked within each zone during the school drop off/pick up period compared with the initial morning (8:00am) and afternoon (3:00pm) count, as well as the number of spaces in each zone still available for parking.

Zone	Location	8:40am		3:30pm	
		Increase in Cars Parked	Spaces Available	Increase in Cars Parked	Spaces Available
1	St David's Close	1	0	2	0
2	Old Lodge Drive	6	4	10	3
3		0	0	0	0
4	St David's Close	17	8	11	3
5		0	1	0	0
6		0	1	0	0
7		-1	3	0	1
8		1	1	2	0
9	High Broom Crescent	5	13	10	4
10		2	22	5	15
11	St David's Close	2	6	1	5
12		2	0	2	0
13	St Eden Park Road/Beckenham Road	8	1	6	1
14		3	16	2	14
15		-1	23	-3	22
16		6	4	6	4
17	Beckenham Road	0	17	2	15
18		0	18	1	17
19		0	10	1	9
20		12	4	10	6
Total		63	152	68	119

Fig.19 – Maximum Increase in Vehicles Parked on Street based on Wednesday 28th September 2022 parking survey.

- 7.4.16 The survey area was zoned to ascertain which areas experience the greatest increase in parking demand during school drop off and pick up times. The surveys show that the largest increases in parking occur within zones closest to the school on St David's Close, High Brooms Crescent, Old Lodge Drive and the A214 South Eden Park Road/Beckenham Road. However, it is noted that there is still space available to park additional cars in these areas.
- 7.4.17 The development proposals will result in the school population increasing to a maximum of 298 pupils and 45 staff (41 FTE). The Transport Assessment states this as an increase of 116 pupils and a total of 12 staff. However, the increase in FTE staff has been stated by the applicant to be 7 staff (a rise from 34 FTE to 41 FTE).

Travel Mode	Pupils		Staff	
	Number	Percentage	Number	Percentage
Walking	13	11.0%	1	12.1%
Scooting	8	6.6%	0	0.0%
Cycling	4	3.8%	1	3.0%
Rail/Overground	0	0.0%	0	0.0%
Tube	0	0.0%	0	0.0%
Public Bus	0	0.0%	1	12.1%
School Bus/Taxi	0	0.0%	0	0.0%
Car/Motorcycle	59	51.1%	9	72.7%
Car Share	32	27.5%	0	0.0%
Total	116	100.0%	12	100.0%

Fig.20 – Travel modes used by additional pupils and staff based on November 2022 existing travel modes survey

- 7.4.18 The trips by travel mode of the additional staff and pupils based on the November 2022 survey data indicate an additional 75 trips visiting the site to drop off and pick up children would be by car (on the basis that the number of pupils car sharing is at least two) and an additional 9 car trips by staff (indicated within Table 4.2 of the Transport Assessment). This would result in a further three staff vehicles parking on street near the school, given that 6 staff vehicles could be accommodated within the new staff parking area.
- 7.4.19 As the strategy of staggered start and end times for year groups, and the provision of before and after school clubs, it is acknowledged that not all of these vehicles picking up/dropping off children would be stopped near the site at the same time. The parking surveys showed that demand for parking on street in the vicinity of the school increased by a maximum of 68 vehicles, whilst the modal split data from the November 2022 travel survey suggests that 118 cars would be travelling to and from the school to drop off and pick up pupils. As such, it is considered that the as a result of the proposed extension in capacity at the school, if fully attended, could result in an additional 44 vehicles stopped on street in the vicinity of the school for a brief period at the start and end of the school day. The parking survey recorded that there was capacity to accommodate demand for additional parking on streets near the school with space for 119 additional cars to park during the busiest period.
- 7.4.20 Having regard to the above, if car use for trips to and from the site were to increase proportionally in line with increases in staff and pupil numbers, the Council's Highways Officer has advised that there is some capacity on street to accommodate any increase in demand for parking at the beginning and end of the school day. Furthermore, they advise that the increase in pupil and staff numbers will occur over three academic school years and Travel Plan monitoring will also enable any increase in car use to be identified and additional measures implemented to reduce the car use.
- 7.4.21 The application is accompanied by a School Travel Plan (June 2023) prepared by TTP Consulting. This seeks to achieve 4 sub-objectives which are outlined as;

- Sub-objective 1: To increase staff, pupils and parent awareness of the advantages and availability of sustainable / active modes of transport;
- Sub-objective 2: To promote the health and fitness benefits of active travel to all users;
- Sub-objective 3: To introduce a package of physical and management measures that will facilitate staff and child travel by sustainable modes; and therefore,
- Sub-objective 4: To reduce unnecessary use of the car for the journey to and from the site by parents and staff.

7.4.22 The Travel Plan includes a number of aims and targets to seek to achieve the above objectives, as well as mechanisms to monitor these targets. The Council's Highways team have advised that the Travel Plan is acceptable and that the actions within it will help to somewhat alleviate the impact with regards to increased car traffic. The Council's Highways team have also advised that, as stated within the Travel Plan, the Council and school will continue to liaise about the development of the initiatives mentioned in the plan.

7.4.23 New cycle and scooter parking is also to be provided as part of the development to further encourage and facilitate an increase in travel by scooter and bicycle.

7.4.24 Further, Policy T4 of the London Plan advise that where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified.

7.4.25 Paragraph 9.18 of Bromley's Planning Obligations Supplementary Planning Document (June 2022) also advises that where necessary, an obligation will be sought to improve the nearby road network to support a proposed development. Policy 31 of the Bromley Local Plan requires that such obligations incorporate or contribute to improvements to traffic management measures that limit the impacts of the development.

7.4.26 The Council's Highways Officer has advised that in order to relieve the pressure and address safety issues around the school site, LB Bromley is proposing to construct a Zebra Crossing on Beckenham Road at the junction with St David's Close. Given the proposed uplift in pupil numbers, a contribution by the applicant of £20,000 towards the cost of the zebra crossing is considered reasonable and appropriate. The applicant has confirmed the agreement to this contribution which would be secured via S106 agreement.

Car Parking

7.4.27 Policy T6 of the London Plan requires car parking to be restricted in line with levels of existing and future public transport accessibility and connectivity. Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public

transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite').

- 7.4.28 Maximum car parking standards relating to specific types of development are outlined within Policies T6.1-T6.4; this covers residential, office, retail, and hotel and leisure development. Supporting text paragraph 10.6.5 of Policy T6 advises that where no standard is provided, the level of parking should be determined on a case-by-case basis taking account of Policy T6 Car parking, current and future PTAL and wider measures of public transport, walking and cycling connectivity.
- 7.4.29 Policy T6 also states that where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy.
- 7.4.30 Disabled parking for non-residential use should adhere to Policy T6.5 of the London Plan which requires 5% of the total parking provision to be designated disabled bays and 5% of the total parking provision to be enlarged bays.
- 7.4.31 In line with Policy T6 provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles for all car parking in new developments.
- 7.4.32 There are 12 existing staff car parking spaces accessed via St. David's Close. The application proposes 6 additional spaces for staff use to be located in front of the proposed new Block A building to the north-west of the site accessed via an existing access, currently used by maintenance vehicles only, from Beckenham Road/South Eden Park Road. This access would still provide access to maintenance vehicles so that they can access the school playing fields to the rear with a new access road located along the north-western side of the site.
- 7.4.33 The six new car parking spaces would include 1 larger space suitable for use by blue badge holders. One active electric vehicle charging point is proposed which would provide EV charging for two cars. Three of the remaining bays would also have passive provision, capable of being upgraded in future to provide electric vehicle charging if needed.
- 7.4.34 It noted that a number of concerns have been raised locally with regards to parking and the need for more on-site parking for staff. However, the Council's Highways Officer has advised that the provision of an additional 6 staff car parking spaces (18 in total), which seeks to strike a balance between minimising the potential for additional staff parking on streets in the vicinity of the site whilst not providing a level of provision that encourages car use in favour of more sustainable travel modes, is acceptable.
- 7.4.35 Staff that car share will be given priority to use this new parking area other than the disabled parking space which will be allocated to accommodate demand by blue badge holders. Accordingly, the provision of car parking on-site for the proposed development is considered to be accordance with policy. A condition requiring a Parking Design and Management Plan would be

secured on any approval to ensure the use of the proposed spaces is appropriately managed.

Cycle parking

- 7.4.36 Policy T5 of the London Plan sets out the requirements for cycle parking provision. For primary schools 1 space per 8 FTE staff and 1 space per 8 students is required to be provided for long-stay cycle parking and 1 space per 100 students required for short-stay cycle parking. Supporting paragraph 10.5.6 also notes that for nurseries and primary schools, an appropriate proportion of long-stay cycle parking spaces for students may be met through scooter parking.
- 7.4.37 The application proposes 6 cycle parking spaces for staff, 3 for visitors and 20 spaces for pupils including one space suitable for parking a larger bicycle such as a tricycle or hand cycle. In addition to cycle parking, a secure store to provide 30 spaces for scooter parking will be provided adjacent to the eastern point of access to the school from St David's Close.
- 7.4.38 The enclosure for the scooter parking would be connected to the bin storage enclosure and would have a flat roof with a height of 1.6m with a timber clad exterior (to match the proposed new classroom buildings) and double doors to provide access.
- 7.4.39 The provision of cycle/scooter parking for staff and visitors would accord with the London Plan, with the provision for pupils exceeding the requirements of the London Plan to encourage and facilitate an increase in travel by bicycle and scooter. In addition, all cycle parking is shown to be covered and secure which is acceptable. The cycle and scooter parking would be secured by way of a condition on any approval.

Delivery & Servicing, and Construction

- 7.4.40 Policy T7 of the London Plan requires development proposals to facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.
- 7.4.41 The application is supported by a Delivery and Servicing Plan (December 2022) and a Construction Logistics Plan (December 2022) both prepared by TPP Consulting.
- 7.4.42 Refuse is currently stored in two areas on site, at the corner of the site at the junction of St David's Close with Beckenham Road and to the rear of the car parking area off St David's Close at the western extreme of the site.

- 7.4.43 The development proposals will retain the western refuse store to the rear of the car parking area off St David's Close. A new storage area is proposed close to the eastern access point on St David's Close as well as a new refuse store at the north-eastern extent of the site on Beckenham Road. The application documents state that the new Beckenham Road refuse store will be accessible by way of sliding doors for convenient access by a refuse vehicle stopping on Beckenham Road and that on the day of collection the bins will be moved to this area for collection.
- 7.4.44 The enclosures for the refuse storage would be timber clad (to match the proposed new classroom buildings) with double doors to provide access. The enclosure to the north-eastern extent of the site on Beckenham Road would have a height of 1.45m to match the height of the existing fencing along the boundary and the enclosure close to the eastern access point on St David's Close (which would be attached to the proposed scooter store) would have a height of 1.6m.
- 7.4.45 In terms of refuse collection and storage the details submitted are considered acceptable.
- 7.4.46 The Transport Assessment states that existing deliveries will simply deliver greater quantities of food and supplies as needed. All vehicles will continue to stop on street when visiting the site although the revised refuse storage arrangements mean that refuse collection vehicles will stop further away from the junction of St David's Close with Beckenham Road which is considered to be an improvement over the existing situation. As the existing level of delivery and servicing activity is not predicted to increase from existing levels this is considered to be acceptable.

7.5 **Impact on Neighbouring Amenity - Acceptable**

- 7.5.1 Policy 37 (e) of the Bromley Local Plan seeks to protect existing residential occupiers from inappropriate development. Issues to consider are the impact of a development proposal upon neighbouring properties by way of overshadowing, loss of light, overbearing impact, overlooking, loss of privacy and general noise and disturbance.
- 7.5.2 The proposed new buildings would be sited away from the boundaries of the site, with the building closest to the immediate neighbour at No. 5 South Eden Park Road, Block A, being located approximately 20m from this adjacent neighbour. The rear of Block A would also be around 35m from the rear of No. 6 St. David's Close. Given this separation and the height of the proposed buildings, there is not considered to be any significant adverse impact on light, outlook or privacy resulting from the proposed development.
- 7.5.3 Concerns raised locally in respect of the impact of the proposal on traffic, noise and air quality are considered separately within the relevant sections of this report.

7.6 **Energy and Sustainability - Acceptable**

- 7.6.1 Policy SI 2 of the London Plan - Minimising greenhouse gas emissions – requires major development to be net zero-carbon, reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following 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.”*
- 7.6.2 Policy SI 2 also requires a minimum on-site reduction of at least 35 per cent beyond Building Regulations for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures.
- 7.6.3 Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either:
- “1) through 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.”*
- 7.6.4 Part E of Policy SI 2 also states that *‘major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions’*.
- 7.6.5 Policy SI 4 states that major development should demonstrate through the energy strategy how the proposal will “reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy’.
- 7.6.6 Policies 123 and 124 of the 2019 Bromley Local Plan are consistent with the strategic aims of the London Plan energy policies.
- 7.6.7 The application is supported by an Energy Statement – Version 5 (14th June 2023) prepared by Achieve Green. The Energy Statement indicates that for the purpose of Building Regulations, the newly constructed classroom block will be treated as a new building, and the extension will be treated as work on an existing building.
- 7.6.8 The Energy Statement states that fabric performance for the extension will surpass the requirements of Approved Document L2. In addition, the mechanical and electrical specification that is incorporated within the extension will be in full accordance with the requirements of the Building

Regulations. To maintain coherence for the control of heating between the existing main building and the new extension, it is proposed to extend the use of the existing main gas heating plant. Any future upgrade of the existing heating plant, including the potential replacement of the existing gas heating plant with a system of improved efficiency can then be of immediate benefit to both the existing building and the extension.

- 7.6.9 In respect of the proposed new building, CO2 emissions within the building are to be reduced through an enhanced fabric and energy efficient systems, as well as further reduction achieved through the installation of an air source heat pump for primary heating and Domestic Hot Water and a 6.84 kWp (18 panel) photovoltaic system on the roof of the building.
- 7.6.10 The total reduction in emissions resulting from energy efficiency measures and the installation of renewable technology is 70% compared to the regulated emissions from a building designed to just meet Building Regulations (2021) Part L2, which surpasses the target reduction of 35%, as required by the London Plan.
- 7.6.11 A 100% reduction in CO2 emissions would be achieved by way of a cash in lieu payment to the London Borough of Bromley of £1,425 which will be secured by way of a s106 agreement on any approval.
- 7.6.12 A condition necessitating the measures set out in the Energy Statement – Version 5 (14 June 2023) to be incorporated into the final design of the development, as well as the submission of the detailed design of the ASHP's and PV panel's would also be required on any approval. This is to ensure compliance with the stated reductions in emissions are achieved and that the ASHP's and PV panels are appropriate in terms of their siting, scale and appearance.

7.7 **Drainage and Flooding - Acceptable**

- 7.7.1 Policy 116 of the Bromley Local Plan (2019) states that all developments should seek to incorporate Sustainable Urban Drainage Systems (SUDS) or demonstrate alternative sustainable approaches to the management of surface water as far as possible. This is supported by Policy SI 13 (Sustainable Drainage) of the London Plan (2021).
- 7.7.2 The application is supported by a Combined Flood Risk Assessment & Drainage Strategy (29th November 2022) prepared by Bailiss & Company.
- 7.7.3 The Council's Drainage Officer has advised that the application is acceptable subject to a condition requiring the detailed design of the measures within the Combined Flood Risk Assessment & Drainage Strategy to be submitted and approved in writing prior to commencement of development.
- 7.7.4 Thames Water have raised no objections to the proposed development.

7.8 **Environmental Health - Acceptable**

Contaminated Land

- 7.8.1 Paragraph 174 of the NPPF (2021) seeks to ensure that planning policies and decisions “contribute to and enhance the natural and local environment by... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil [and] water...pollution;...[and] remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate”.
- 7.8.2 Policy 118 of the Bromley Local Plan states that where the development of contaminated land, or land suspected of being contaminated, is proposed, details of site investigations and remedial action should be submitted.
- 7.8.3 The application is accompanied by a Main Investigation Report (November 2022) prepared by Soils Limited.
- 7.8.4 The Council’s Environmental Health Officer has advised that our mapping highlights an area of potentially contaminated land to the north of the proposed development of potentially unknown fill. However, the risk posed is relatively low, and so they therefore recommend only an informative to be added to any approval, as advice to the applicant.

Air Quality

- 7.8.5 Policies SI 1 of the London Plan and 120 of the Bromley Local Plan detail the need to tackle poor air quality.
- 7.8.6 The application site falls within Bromley’s Air Quality Management Area (AQMA).
- 7.8.7 The application is supported by an Air Quality Assessment (AQA) (1st March 2023) prepared by Redmore Environmental.
- 7.8.8 The Council’s Environmental Health Officer has advised that the supporting AQA demonstrates that the proposal would comply with Bromley and London Plan policies in respect of air quality.

Noise

- 7.8.9 London Plan Policy D14 (Noise) states that development should reduce, manage and mitigate noise to improve health and quality of life. This is supported by Bromley Local Plan Policy 119.
- 7.8.10 The application is supported by a Noise Impact Assessment (NIA) (February 2023) prepared by E3P.
- 7.8.11 The Council’s Environmental Health Officer has advised that the supporting NIA demonstrates that the proposal would comply with Bromley and London Plan policies in respect of noise.

7.9 **Statement of Community Involvement**

- 7.9.1 The London Borough of Bromley's Statement of Community Involvement (2016) expects applicants of 'significant' applications to contact local residents and interest groups informing them of the development proposed; and arrange a public meeting or exhibition at a suitable location in close proximity to the application site in order to allow the proposal to be more fully understood by the local community prior to submission.
- 7.9.2 This application is supported by a Statement of Community Involvement which outlines the residential engagement and pre-application engagement undertaken by the applicant prior to submission comprising;
- Pre-Application engagement with Bromley Council
 - Pre-Application engagement with Met Police Secure by Design Officer
 - Erection of consultation boards at the school explaining the proposals
 - Letter drop to pupil parents and nearby local residents to notify them of the proposals
 - Setting up of a dedicated consultation webpage on Hume Planning Consultancy's website, where consultation material has been published and provides an opportunity to provide feedback to the project team
 - Contacting local Ward Councillors to explain the proposals and offer to meet to discuss further.
- 7.9.3 Concerns have been raised by local residents as to the inadequacy of the applicant's consultation process. However, Officers are of the view that the consultation carried out prior to the application being submitted complies with the key principles set out in the Council's Statement of Community Involvement.

7.10 **Planning Obligations and CIL**

Community Infrastructure Levy (CIL)

- 7.10.1 The Mayor of London's CIL and the London Borough of Bromley Community Infrastructure Levy (CIL) are material considerations. The proposed development is for the provision of education and as such neither Mayoral nor Bromley CIL is payable on this application. The application has completed the relevant form.

Heads of Terms – Infrastructure impact and mitigations:

- 7.10.2 The National Planning Policy Framework (NPPF) states that in dealing with planning applications, local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be

used where it is not possible to address unacceptable impacts through a planning condition. It further states that where obligations are being sought or revised, local planning authorities should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled. The NPPF also sets out that planning obligations should only be secured when they meet the following three tests:

- (a) Necessary to make the development acceptable
- (b) Directly related to the development; and
- (c) Fairly and reasonably related in scale and kind to the development.

7.10.3 Policy 125 of the Bromley Local Plan (2019) and the Council's Planning Obligations SPD state that the Council will, where appropriate, enter into legal agreements with developers, and seek the attainment of planning obligations in accordance with Government Guidance.

7.10.4 The following planning obligations have identified as necessary to mitigate the impacts of this development should permission be granted:

- Carbon Off-Set Contribution (£1,425)
- Highway Improvements Contribution (£20,000)
- Monitoring (a cost of £500 per Head(s) of term)
- Council's Legal costs for preparing the S106

7.10.5 Officers consider that these obligations meet the statutory tests set out in Government guidance, i.e. they are necessary, directly related to the development and are fairly and reasonably related in scale and kind to the development.

7.10.6 The applicant has agreed, in principle, to enter into a S106 legal agreement to secure the above Heads of Term, should planning permission be granted.

7.11 **Public Sector Equality Duty**

7.11.1 Section 149 of the Equality Act (2010) which sets a Public Sector Equality Duty (PSED) came into force in April 2011 and requires the Council to consider the equality impacts on all protected groups when exercising its functions.

7.11.2 In the case of planning, equalities considerations are factored into the planning process at various stages. The first stage relates to the adoption of planning policies (national, strategic and local) and any relevant supplementary guidance. A further assessment of equalities impacts on protected groups is necessary for development proposals which may have equality impacts on the protected groups.

7.11.3 With regards to this application, all planning policies in the London Plan and Bromley Local Plan and National Planning Policy Framework (NPPF) which have been referenced where relevant in this report, have been considered with regards to equalities impacts through the statutory adoption processes,

and in accordance with the Equality Act 2010 and Council's PSED. Therefore, the adopted planning framework which encompasses all planning policies which are relevant in the officers' assessment of the application are considered to acknowledge the various needs of protected equality groups, in accordance with the Equality Act 2010 and the Council's PSED.

- 7.11.4 It is also necessary to have due regard to the public sector equality duty, which sets out the need to eliminate unlawful discrimination, harassment and victimisation; to advance equality of opportunity; and to foster good relations between people who share a protected characteristic and people who do not share it.
- 7.11.5 The protected characteristics to which the Public Sector Equality Duty (PSED) applies include age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, sexual orientation, religion or belief and sex.
- 7.11.6 The proposal would provide new and improved education facilities for young children, the justified demand for which has been discussed within Section 7.1 of this report. The building has also been designed to improve access for all, including wheelchair users, with a new lift within the Block B extension to Justin Hall connecting both floors, new ramped access to the rear of Justin Hall and a lift within Block A.
- 7.11.7 There are also negative impacts expected in relation to construction, such as increased vehicular movements, noise and air quality which would have the potential to affect the following equality groups; age, disability, pregnancy and maternity. These impacts are however considered short term and would depend on the measures that would be set out in the Construction Management Plan and other relevant conditions aimed to minimise disruption and mitigate the impacts.
- 7.11.8 In conclusion, it is considered that LB Bromley has had due regard to section 149 of the Equality Act 2010 in its consideration of this application and resulting recommendations to the Plan Sub Committee.

8 PLANNING BALANCE AND CONCLUSION

- 8.1 The applicant has evidenced that there is a demonstrable need for the ongoing use of the existing building with expired permission and the proposed additional educational buildings to cater for children already on the school roll and to meet future expansion. Furthermore, the proposed buildings have been sensitively designed to limit the impact on the Urban Open Space without compromising the educational requirements.
- 8.2 The scale, layout and appearance of the proposed development would respond appropriately to its setting and given its siting would not cause any undue harm to neighbouring amenity.

- 8.3 Whilst it is acknowledged that some landscape clearance has already occurred and is proposed to facilitate the additional building, the proposal seeks to introduce new landscaping and biodiversity enhancements to contribute to the nature conservation value of the site, achieving a Biodiversity Net Gain of +133.90% and an Urban Greening Factor of 0.58 which is a significant benefit.
- 8.4 The proposal would provide an appropriate amount of car parking given its use and location and would not result in any adverse transport impacts. Additional cycle and scooter parking is also proposed as part of the development and this along with the submitted Travel plan will help to encourage more sustainable and active modes of transport. The applicants have also agreed to a contribution towards the construction of a Zebra Crossing on Beckenham Road to improve crossing facilities in the area.
- 8.5 The technical documents submitted in respect of energy, drainage, air quality, noise, and contamination are also considered to be acceptable, and their recommendations should be conditional of any grant of permission given.
- 8.6 Having had regard to the above, it is considered that the proposed development is acceptable. Accordingly, the application is recommended for permission, subject to the prior completion of a S106 legal agreement. In reaching this conclusion Officers have had regard to the statutory provisions of Section 70 of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 which dictate that decisions must be undertaken in accordance with the development plan, unless material considerations indicate otherwise.
- 8.7 Background papers referred to during production of this report comprise all correspondence on the files set out in the Planning History section above, excluding exempt information.

RECOMMENDATION: PERMISSION BE GRANTED SUBJECT TO A S106 AGREEMENT

SUMMARY OF CONDITIONS AND INFORMATIVES

Standard

- **3yr time limit**
- **Compliance with approved plans/documents**

Pre-Commencement

- **Submission of full CEMP.**
- **Pre-development landscape clearance strategy.**
- **Tree Protection Measures in accordance with Tree Protection Plan.**
- **Detailed design of drainage measures.**
- **Existing and Proposed Site/Slab levels.**

Above Ground works

- Secured by Design.
- External Materials.
- Details of rooftop plant.
- Full details of hard and soft landscaping to also meet UGF calculation.
- Full details of biodiversity enhancements.
- Landscape and Ecological Management Plan (LEMP)

Prior to Occupation/First Use

- Compliance with Energy Strategy and Details of PV Panels/ASHP's (to also accord with AQA).
- Car Parking Management Plan and implementation of Car Parking.
- Implementation of EVCP's.

Compliance

- Temporary permission for retention of Early Years building (building 2) for an additional 5 years.
- Removal of temporary buildings (buildings 3 and 4).
- Compliance with Tree Protection Plan.
- Compliance with Fire Statement.
- Compliance with Travel Plan.
- Compliance with NIA.
- Compliance with AQA.
- Compliance with refuse storage details.
- Compliance with cycle and scooter parking details.
- NRMM compliance

And delegated authority be given to the Assistant Director: Planning & Building Control to make variations to the conditions and to add any other planning condition(s) as considered necessary.

Informatives

- Contaminated Land
- Building Regulations Approved Code S technical guidance regarding electric vehicle charge point requirements.
- Thames Water Groundwater Risk Management Permit.
- Use of Thames Water mains water for construction purposes.
- Thames Water minimum pressure.
- Alterations to Street furniture or Statutory Undertaker's apparatus