

Harris Aspire Academy, Lennard Road, Beckenham**in the London Borough of Bromley****planning application no.14/04637/FULL1****Strategic planning application stage 1 referral**

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

The proposal

New two storey rear extension for 12 classrooms with ancillary facilities and elevational alterations to provide accommodation for a total roll of 135 pupils. All weather hockey pitch and two hardstanding netball courts, fencing and landscaping.

The applicant

The applicant is the **Education Funding Agency** and the architect is **Paul Murphy Architects**.

Strategic issues

School provision on Metropolitan Open Land and playing fields, urban design, access, sustainable development, flood risk management and transport are the most relevant strategic issues to this application.

Recommendation

That Bromley Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 63 of this report; but that the possible remedies set out in that paragraph of the report could address these deficiencies.

Context

1 On 6 January 2015 the Mayor of London received documents from Bromley Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 16 February 2015 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 3D of the Schedule to the Order 2008: *"Development – (a) on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and (b) which would involve the construction of a building with a floor space of more than 1000 square metres or a material change in the use of such building."*

3 Once Bromley Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision, as to whether to direct refusal or allow the Council to determine it itself, unless otherwise advised. In this instance if the Council resolves to refuse permission it need not refer the application back to the Mayor.

4 The Mayor of London’s statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The application site is within the London Borough of Bromley situated on the north of Lennard Road, Beckenham. On the east, a hard surfaced path separates the site from the Pool River and beyond that is HSBC Group Sports Ground. Allotments, private houses and gardens are located along the western boundary.

6 The site currently contains a former school sports and conference centre building previously occupied by Harris Academy Bromley. The site is located within designated Metropolitan Open Land.

7 The closest part of the Transport for London Road Network (TLRN) is over 2km from the site, whilst Beckenham Road (A234), part of the Strategic Road Network (SRN), is 900m away. The site is within acceptable walking distance of New Beckenham and Kent House National Rail stations and stops for two bus routes (352 and 356). Two other bus routes (79 and 194) have stops 720m from the site which may also be used by staff, students and visitors but are beyond what is considered to be acceptable walking distance. As a result, the public transport accessibility level (PTAL) is 3 (moderate), on a scale of 1 to 6, where 6b is the most accessible.

Details of the proposal

8 It is proposed to extend the existing building with a new two-storey modular building to provide 12 new classrooms, administrative and other ancillary facilities. The proposal incorporates a multi-use game area (including two netball courts) and an artificial grass pitch (including a football pitch and a mini hockey pitch). The footprint of the extension is 840sqm with a gross internal area of 1,716sqm.



Proposed site plan: Source – applicant’s submitted pre-app document

Case history

9 A pre-planning application meeting was held at City Hall on 11 November 2014 including the applicant and its agents and GLA officers. The applicant was advised that the proposal could be supported provided the matters raised in regard to strategic planning issues such as land use principles, provision of education facility on Metropolitan Open Land, playing fields, community use, urban design;

inclusive design; sustainable development and transport are fully addressed before the application is submitted to the local planning authority.

Strategic planning issues and relevant policies and guidance

10 The relevant issues and corresponding policies are as follows:

- Education *London Plan;*
- Metropolitan Open Land *London Plan;*
- Playing fields *London Plan;*
- Urban design *London Plan;*
- Access *London Plan; Accessible London: achieving an inclusive environment SPG;*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy;*
- Flood risk *London Plan;*
- Transport *London Plan; the Mayor's Transport Strategy;*

11 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2006 Bromley UDP (saved policies), and the 2011 London Plan (with Alterations, 2013).

12 The following are also relevant material considerations:

- The Emerging Bromley Local Plan.
- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework.
- The draft Further Alterations to the London Plan - 'intend to publish' version as submitted to the Secretary of State December 2014.

Principle of Land Use: Education facility on Metropolitan Open Land

13 Harris Academy has identified the need for increased school places from 90 (which the school building currently accommodates) to 135 pupils by next year for Alternative Provision scheme. Alternative provision (AP) is education arranged by local authorities for pupils who, because of exclusion, illness or other reasons, would not otherwise receive suitable education; education arranged by schools for pupils on a fixed period exclusion; and pupils being directed by schools to off-site provision to improve their behaviour.

14 The new two storey school extension, which will be located at the rear of the existing school building, will have twelve classrooms (six on each of the ground and first floors), administration offices and other ancillary facilities, a new all-weather mini hockey pitch & netball courts on the existing playing fields.

15 In relation to the provision of educational facilities, policy 3.18 'Education facilities' of the London Plan states that "*Development proposals which enhance education and skills provision will be supported, including new build, expansion of existing facilities or change of use to educational purposes*".

16 The above policy states '*The Mayor will support provision of early years, primary and secondary school and further education facilities adequate to meet the demands of a growing and changing population and to enable greater educational choice, particularly in parts of London with poor educational performance. ...Development proposals which enhance education provision will be supported, including new build, expansion of existing facilities or change of use to educational purposes.*

17 Para 72 of the NPPF states *'The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local Planning Authorities should take a proactive, positive and collaborative approach to meeting this requirement and to development that will widen the choice of education. They should give great weight to the need to create, expand or alter schools.'*

18 The application site is part of a larger area identified as Metropolitan Open Land. The NPPF in Para 87 and 88 sets out that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in 'very special circumstances'. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. *It should also be noted that London Plan policy 7.17 states that the strongest protection should be given to the London's MOL and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green Belt.*

19 The application site is part of a larger area identified as Metropolitan Open Land. The National Planning Policy Framework (paragraph 89) and the London Plan (policy 7.16) set out that only development associated with agriculture, forestry, outdoor sport and recreation, limited infilling and redevelopment of existing sites is appropriate in the Green Belt. All other forms of development are, by definition, 'inappropriate'. In order for 'inappropriate' development to be acceptable in the Green Belt, very special circumstances must apply.

20 The applicant has acknowledged that in the Saved UDP of Bromley Council policy C7 (para 13.24) states that "... many schools across the Borough lie within the Green Belt or MOL. Education facilities are not appropriate uses in the Green Belt and proposals for new buildings or extension associated with educational uses will therefore have to show that very special circumstances exist."

21 The applicant has identified the 'very special circumstances' that may justify the proposed school development on the Metropolitan Open Land. The applicant's justifications are presented below but can be summarised as meeting the pressing educational needs of the borough and limited impact on the character, appearance and openness of the Metropolitan Open Land.

- Increased demand for Alternative Provision (AP) School Places in the area and the need to improve quality of provision: In 2010 the Department for Education published 'The Importance of Teaching: the Schools White Paper'. That Paper referred, amongst other things, to an Ofsted survey being carried out at the time which was revealing a considerable variation in the quality of Alternative Provision. The White Paper stated that 'in the light of [Ofsted's] findings it would consider how best to ensure high quality provision' (Para 3.36 of White Paper). That acute need in Bromley is supported by the published statistics. There are currently large numbers of permanently excluded students in Bromley and neighbouring local authorities. For their part, the Education Funding Agency (EFA) has been acutely aware since 2012 of the need to increase the quantity and quality of AP provision in the Croydon area (which extends to Bromley). In light of this, Harris's business case for an increase in pupil numbers in the area was presented to EFA in autumn 2013. Ministers approved the case, and the additional funding that it implied. It should be noted that the DfE have not approved any other AP schools in the area at the present time.
- Search for an Appropriate Site (Sequential Test): To cater for the increased AP role, a number of site locations were considered. In searching for sites, Harris' priorities were to obtain a site that had good connections by train, tram and bus to a wide area including Croydon and Lewisham, since the Academy would serve children coming from a wide area.
 - In August 2012, DTZ undertook a site availability appraisal on behalf of Harris (report submitted herewith titled 'Availability Schedule v2 for Harris Aspire Academy, Croydon August 2012'). The search identified 27 London Road as a potential site. The

owners confirmed they would be willing to sell the entire building in November 2012, however subsequently pulled out of any potential transaction.

- Further searches were commissioned in December 2012 and March 2013 – reports submitted as part of application documentation). The latter identified Wren Court, which Harris pursued in April 2013, however following analysis it was apparent that the site was too costly and was dropped.
- In total, 15 sites were identified, located across Beckenham, Bromley, Croydon, Forest Hill Sydenham, Lower Sydenham, and Upper Norwood. Each site was assessed in terms of location, accommodation and potential use for an educational use. None were suitable.
- Concurrently, The Harris Federation identified the application site (Lennard Road) as surplus to requirements within their portfolio of premises. This followed approval of a Priority Schools Building Programme to rebuild the Harris Academy Bromley on the main campus site across the road, which is now subject of planning application (Bromley Reference 14/03636/FUL).
- The Foundation also identified Harris Academy Beckenham as surplus but the area of surplus building was not large enough to accommodate 45 pupils and would result in the AP children having direct access to the mainstream pupils causing segregation issues and a difficulty in providing the AP children with their own identity. ‘Split site’ options were considered, including the Lennard Road site and other sites in the local area, to fulfil the 135 student role approved by the DfE. However the nature of splitting the Academy across two or more sites presented many operational and logistical problems.
- The site which is the subject of this application fulfils all the above requirements. In addition to meeting an identified need and raising the quality of provision, the increase in size of the Free School will secure its financial viability and the greater opportunity to innovate and offer new courses.
- Suitable development of the application site: The potential to extend the building vertically was considered by structural engineers. It was advised that the existing building at the site was not originally designed to accommodate additional structural loading which would occur. In summary, extending the building vertically, was discounted as: a) The existing building is unsuitable to carry the new structure b) The extent of disruption to the existing facilities during construction works would render the entire site inaccessible c) Significant and unviable cost. In addition, the increased height of the building was considered to have a significant visual impact on the surrounding area and the MOL.
- Visual impact of the proposed development on MOL/Green Corridor: The extension is sited so as to minimise the impact on the MOL/ Green Corridor. The proposed development has sought to respect the area to the west of the existing buildings, keeping them open, since this area reads as part of a continuous green swathe running from Southend Park in the north to Cator Park in the south. It is very important that the open land on either side of Lennard Road at this point remains open, to preserve the integrity of the green swathe. Views to the north from Lennard Road will be largely unaffected since the proposed extension will sit behind the main buildings. The extension will be visible from the cemetery to the west but it will be seen against the background of a row of tall poplar trees. It is acknowledged that the extension will reduce the openness of the area when viewed from the public footpath to the east, however, the foreground of this view will comprise the courtyard formed by the ‘L’ shaped plan, which is proposed to be extensively landscaped, forming a ‘break-out’ space for recreation. The eastern edge of this footpath is heavily landscaped within dense mature trees and other landscaping. Overall the proposed development minimises the impact on the MOL.

This is achieved through the subservient size of the extension compared to its host, together with the sensitive location of the extension toward to rear of the site, respecting the key views along Lennard Road, northwards. More generally, the proposed development will improve the appearance and quality of the existing buildings, the provision of more appropriate external facing materials will improve its connection with the MOL and the surrounding area.

- The applicant's summary of very special circumstances: In light of the acute needs for additional Alternative Provision School Places in the local area, the lack of alternative sites available in the local area, including the difficulty of intensifying the existing buildings on site, the applicants consider that there are very special circumstances to justify the scheme.

22 GLA officers assessment of the applicant's '*very special circumstances*' case is as follows:

- Educational needs including Alternative Provisions: The Mayor supports the expansion of schools and acknowledges that there are various factors that limit potential sites and configurations to address the pressing need of school places. In this instance, the applicant has clearly set out the predicted demand for school places across the area and how this is being met, in particular with the case of Alternative Provision. Therefore, the case for educational needs is accepted as a 'very special circumstance'.
- Limited impact on Metropolitan Open Land/ the Green Corridor: The NPPF allows for redevelopment of previously developed sites but only where it would not have a greater impact on the openness of the Green Belt. In this instance, although the proposals appear to result in a marginal increase in built form (the slight increase in footprint), the development is contained on the existing play area at the back of the existing building and that the overall development will be designed in a more compact form which is proposed to be extensively landscaped with extensive tree screening, limiting the proposals impact on the character and openness of the Metropolitan Open Land. Therefore, the case for limited impact on the Metropolitan Open Land is accepted as a 'very special circumstance'.
- Search for alternative sites (sequential test) and the constraints of vertical development on the site have been successfully demonstrated. The provision of a new multi-use game area (including two netball courts) and an artificial grass pitch (including a football pitch and a mini hockey pitch) enhances the use of the existing playing fields.

23 In conclusion, it is considered that the applicant has successfully demonstrated the 'very special circumstances' that justify the inappropriate development on Metropolitan Open Land. On balance, it is considered that the benefits of the scheme, its contribution in overcoming shortages of school places in London, would outweigh the limited harm it would have on the character, appearance and openness of the Metropolitan Open Land.

Playing fields

24 Policy 3.19 of the London Plan sets out that those proposals that increase or enhance the provision of sports and recreation facilities will be supported; whereas those that result in a net loss of sports and recreation facilities, including playing fields should be resisted. In this context, the proposals are considered to enhance sports facilities and improve the waterlogged fields. Therefore the development is supported in principle, by providing improved facilities for this, the adjacent school and local communities.

25 In regard to impact on the existing playing fields great care has been taken in keeping the openness of the MOL intact looking north from Lennard Road as the new multi-use game area (including two netball courts) and an artificial grass pitch (including a football pitch and a mini hockey pitch) are proposed to be located on the existing playing fields.

26 The applicant has produced a letter from Sport England dated 30 September 2014, which state that the development would meet exception E3 of its policy and also has the potential of meeting its E5 policy. The applicant’s early engagement with Sport England is welcomed.

Community use

27 The London Plan (3.18E) expects community use to be maximised. As discussed at the pre-application meeting, the applicant should provide a community use plan, which demonstrates the extent of proposed community use of the facilities, in a form that can be secured by the Council to ensure delivery.

28 The design of the school should also assist in this, for example by creating zones where community use can be easily provided (for instance to the playing fields, the School Hall, etc), while ensuring that access to other parts of the school can be easily prevented.

Urban Design

29 Good design is central to all objectives of the London Plan (2011) and is specifically promoted by the policies contained within chapter seven which address both general design principles and specific design issues. London Plan policy 7.1 sets out a series of overarching design principles for development in London.

30 Layout: The proposed layout arrangement has been designed with the aim of maintaining the openness of the MOL by positioning the new school extension to the rear of the existing building and close to a line of mature trees along the edge of the Pool River. By locating the new extension on the north of the site, the proposed development enables a direct clear link to the existing building and the “L” shaped plan of the new building. The classrooms are located along the north and east edges of the building, providing views over the adjoining HSBC sports ground; and the administrative accommodation is located along the west elevation providing views over the school’s sports fields, this layout approach is welcomed. In order to provide an acceptable level of headroom for ground floor accommodation in the existing building, the existing first floor is at a level higher than that required in the new premises. Level access is however achieved via a step free link between the existing and the proposed ground floor, whilst a platform lift negotiates the difference of level between the existing and proposed first floor. (As discussed at the pre-application meeting, a passenger lift is preferred rather than a platform lift – see comments on Inclusive design below).



South west view (from Lennard Road) of the proposed development – Source: applicant’s design and access statement

31 Massing, scale and appearance: The massing strategy and simple architectural language of the proposal draws from the proportions of the existing building to create a consistent building form, which

is welcomed and the overall height of the proposed addition steps down from that of the existing building, providing a degree of visual delineation between the two elements. It is proposed to finish the external facades with a mix of self-coloured render and High Pressure Compact Laminates cladding. The use of the self-coloured render gives a softer appearance to the building respecting the MOL, and the laminated cladding provide visual definition to the surface treatment of the principle elevations. As shown below, Render is to be in standard white colour, and the laminated cladding is to be a mix of colours English Cherry and Mid Grey. The existing fair-faced west and south (limited to the existing main entrance block) elevations of the existing building will be rendered to provide further visual consistency between existing and proposed. The west elevation is generally plain to complement the existing west elevation, whilst the north and east elevations are modelled to provide a more scaled down design which reflects the use of the rooms on that side of the building. The Council is encouraged to secure details of both the rendering system and laminate cladding, to ensure the highest possible quality of materials are secured as part of any future permission, in order to ensure a high quality building is built through.



Proposed west, east and north elevations, respectively: Source - applicant's design and access statement.

32 Finally, given the level of flood risk of the area, the finished floor levels of the ground floor should be set at 410mm above the predicted 1 in 100 year + climate change flood level (see below the flood risk comments) and the changes in the levels between the existing and proposed development should be revisited in this context.

33 In summary, the simple architectural approach to the new addition is supported, and the connection with the existing building is well articulated by the 3metre wide setback. The impact on the MOL is considered to be minimal and therefore acceptable from a strategic perspective. However, the flood risk factor should be revisited as part of the overall design and taking the flood risk into consideration, a detailed landscaping that mitigates the risk should be provided.

Inclusive design

34 The applicant has submitted design and access statement and has stated it demonstrates that the development complies with inclusive design policy 7.2 of the London Plan, Accessible London SPG and Building Bulletin 102.

35 The design and access statement in section 6 proposes the following access arrangements:

- A lift, which is going to be retained, connects the ground floor to the first floor. The ground floor of the new extension will be level with the existing ground floor. The existing finished first

floor level is higher than the proposed new first floor. This difference of levels is due to the increased headroom of the existing ground floor building which includes double height accommodations. To mitigate the difference between the existing and the new first floor, a platform lift will be provided at the junction between the two buildings.

- An existing ramp negotiates the difference of levels between the external ground and the ground floor level. The existing building is on two floors and each floor is step-free.
- The ground surrounding the new building will be landscaped to include ramps which will enable a step-free access from the classrooms to the external play areas.
- The existing main entrance will be retained. New doorways are designed to provide clear internal door openings of minimum 850mm.

36 Whilst the above arrangements are welcomed, there remain concerns that were raised during the pre-application meeting. There was a discussion about the provision of additional accessible WCs both on the ground and first floors of the proposed new two storey extension of the school. The applicant is required to reconfigure the layouts to provide more convenient accessible WCs for the proposed extensions. Furthermore, access for the extension building via the footway adjoining the river should be revisited in the context of inclusive design.

37 Usually passenger lifts are preferable than platform lifts, but if the latter is opted justifications should be provided accompanied by details of specifications and management plan. It should be ensured that the lifts are a suitable size to accommodate a variety of potential users i.e. lift which incorporates the minimum dimensions may not be suitable in this situation; therefore, details of the specifications should be provided.

38 The applicant has confirmed that two disabled parking spaces (one existing and the other as additional) out of the total 23 proposed spaces would be provided. Whilst this provision is welcomed, it has to be increased by 2 more parking spaces (see TfL's comments below).

Sustainable development

Overview of proposals

39 The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole. The proposals are broadly acceptable.

Energy efficiency standards

40 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. The development is estimated to achieve a reduction of 1.3 tonnes per annum (7%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development. Modelling outputs have been provided to support the savings claimed.

District heating

41 The applicant has confirmed that there are no existing or planned district heating networks within the vicinity of the proposed development. The site is located in an area of low density and very limited opportunity for district heating development so the building is not required to be future proofed for district heating. Due to the intermittent nature of the heat load, combined heat and power is not proposed. This is accepted in this instance.

Renewable energy technologies

42 The applicant is proposing to install 100sqm of solar photovoltaic (PV). A reduction in regulated CO₂ emissions of 6 tonnes per annum (32%) will be achieved through this third element of the energy hierarchy.

Overall carbon savings

43 The table below shows the residual CO₂ emissions after each stage of the energy hierarchy and the CO₂ emission reductions at each stage of the energy hierarchy.

Table: CO₂ emission reductions from application of the energy hierarchy:

	Total residual regulated CO₂ emissions	Regulated CO₂ emissions reductions	
		(tonnes per annum)	(%)
Baseline i.e. 2013 Building Regulations	19.35		
Energy Efficiency	18.08	1	7%
CHP	18.08	0	0%
Renewable Energy	12.37	6	32%
Total		7	36%

44 A reduction of 7 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 36%. The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan.

Flood risk management

45 The site is partly within Flood Zone 3a and partly within Flood Zone 3b. A Flood Risk Assessment (FRA) has been prepared by Ambiental. This confirms that the school building is within flood zone 3b. The FRA states that the site experienced surface water flooding in 1977. However, the FRA does not report the fact that the site is shown on the EA website as having considerable surface water flood risk. This position correlates with work undertaken by the Drain London project. Therefore the FRA does not appear to give sufficient consideration to surface water flood risk.

46 Given the level of flood risk a proposal for a school should not normally be permitted. However it is recognised that a school already exists on site and that there may be an over-riding need for school places and therefore, despite the flood risk, the proposals might be permitted. In this case the FRA states a number of mitigation measures that seek to manage the risk:

47 The finished floor levels of the ground floor will be set at 410mm above the predicted 1 in 100 year + climate change flood level. The following measures should also be implemented:

- Bringing down electrical services from the ceilings.
- Wiring and power outlets raised 600mm above ground floor level.
- Solid floors where possible.
- Non-return valves on sewers to prevent back-flow.
- Signing up to EA Flood Warning Service.
- Preparation of a flood emergency plan.

48 Taken together these measures represent a reasonable attempt to manage the risks to the site and its occupants. It is recommended that consideration is also given to ways of enclosing electrical power and other utility services within flood proof rooms/enclosures.

49 The FRA states that floodplain compensation will be provided by voids under the proposed buildings. This appears to contradict one of the proposed flood risk mitigation measures of using solid floors. The FRA specifies a fairly detailed inspection regime for the void areas; this may well be considered onerous for the school to comply with.

Surface water run-off

50 As already stated the FRA does not give proper consideration to the risk of surface water flooding. Furthermore, the FRA states that the existing site is covered in impermeable surfaces. However, aerial photography indicates that the majority of the proposed development area is in fact playing fields.

51 Furthermore, the Drain London project has identified the Harris Academy as one of the secondary schools in London with the highest risk of surface water flooding. Therefore a fresh approach to surface water management is required. The Drain London project already has a consultant scheduled to work with the school during 2015 to examine potential activities to mitigate and reduce surface water flood risk.

52 It is recommended that the FRA and drainage strategy are re-worked along with input from the Drain London Consultant working on this school (Aecom). The revised FRA/Drainage Strategy should aim to attenuate and/or infiltrate surface water from the whole school site in low impact areas away from school buildings. There may be a need to provide some areas within the school grounds that are designed to temporarily store surface water.

53 This will ensure that the proposals are in line with London Plan policy 5.13 and that the risks to the school and the wider area are managed as effectively as possible.

54 In summary, the site is within flood risk zone 3a and 3b. Normally such proposals should not be permitted. If an exception were to be made due to the over-riding need for the school extension, the FRA should be updated to properly take account of the surface water flood risk and increase the flood risk management measures to be secured as part of any permission. This will ensure that the proposals are in line with London Plan policy 5.13 and that the risks to the school and the wider area are managed as effectively as possible.

Transport for London's comments

Car and cycle parking

55 The proposal includes 19 staff car parking spaces including the one disabled parking bay which is considered too high considering that there would only be an additional 6 staff. Disabled car parking should be increased to two spaces. Cycle parking is not in accordance with the draft Further Alterations to the London Plan and should be increased to 22 spaces.

Public realm and access

56 The student entrances should have improved access for disabled users and cyclists and improved security.

Servicing and construction

57 The applicant is expected to provide a construction logistics plan which should be secured by way of condition or within section 106 Agreement.

Travel plans

58 As this is a specialist school it will have a different catchment area and travel characteristics to the associated school opposite and should therefore have its own travel plan. The plan(s) should be secured, enforced, monitored and reviewed as part of the s106 agreement.

Summary

59 Cycle parking and disabled parking must be increased, and the general car parking is deemed too high. Access arrangements to the upper school could be more convenient for students, especially for cyclists and wheelchair users. Harris Aspire should have its own travel plan, which should be secured through condition or within section 106 Agreement. The construction logistics plan is also to be secured by way of condition.

Local planning authority's position

60 Bromley Council planning officers have yet to confirm their position.

Legal considerations

61 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement

setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged or direct the Council under Article 6 of the Order to refuse the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

62 There are no financial considerations at this stage.

Conclusion

63 London Plan policies on provision of school facilities on Metropolitan Open Land, playing fields and community use, urban design, access, sustainable development, flood risk management and transport are the most relevant strategic issues to this application. The proposed development broadly complies with the London Plan. However, there are few issues that must be addressed as set out below:

- **School provision on Metropolitan Open Land:** Very special circumstances have been demonstrated that justify the school expansion on Metropolitan Open Land. The development impact on the openness of the Metropolitan Open Land is limited. The proposal is acceptable in land use terms.
- **Playing fields and community use:** The proposed development enhances the use of the playing fields, which is supported. However, the applicant should provide a community use plan that ensures local people and sport clubs benefit from the proposed facilities. This should be secured through s106 agreement.
- **Urban design:** The simple architectural approach to the new addition is supported. The impact on the MOL is considered to be minimal and therefore acceptable from a strategic perspective. However, the flood risk factor should be revisited as part of the overall design and taking the flood risk into consideration, a detailed landscaping strategy that mitigates the risk should be provided.
- **Inclusive design:** Concerns in regard to the proposed platform lift and provision of additional WCs should be addressed and secured.
- **Sustainable development:** The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan. All proposed measures should be secured.
- **Flood risk management:** The site is within flood risk zone 3a and 3b. Normally such proposals should not be permitted. If an exception were to be made due to the over-riding need for the school extension, the Flood Risk Assessment should be updated along with inputs from Drain London to properly take account of the surface water flood risk and improve the flood risk management measures to be secured as part of any permission.
- **Transport:** Cycle and disabled car parking must be increased. Harris Aspire should have its own travel plan and should be secured including the submission of construction logistics plan.

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