

PART 5: Planning Applications for Decision

Item 5.1

1.0 SUMMARY OF APPLICATION DETAILS

Ref:	19/00303/FUL
Location:	Coombe Lodge Playing Fields, Melville Avenue, South Croydon, CR2 7HY.
Ward:	Croham
Description:	Change of use of the site from playing fields (D2) to temporary secondary school (D1) until 31 st December 2020 for 360 pupils, with associated erection of a temporary three storey school building, car parking, cycle stands, bin stores, fencing, soft and hard landscaping.
Drawing Nos:	FS045-COOMBEWOOD-TEMP-A-322 P3, 323 P3, 325 P3, 326 P3, 631 P1, 632 P1, 637 P1 and 638 P1.
Applicant:	Education and Skills Funding Agency
Agent:	Nicholas Milner of Cushman & Wakefield
Case Officer:	Barry Valentine

- 1.1 This application is being reported to Planning Committee because the Ward Councillor (Cllr Maria Gatland) made representations in accordance with the Committee Consideration Criteria and requested Committee consideration; objections above the threshold in the Committee Consideration Criteria have also been received.

2.0 RECOMMENDATION

- 2.1 That the Planning Committee resolve to GRANT planning permission.
- 2.2 That the Director of Planning and Strategic Transport is delegated authority to issue the planning permission and impose conditions and informatives to secure the following matters:

Conditions

- 1) In accordance with the approved drawings.
- 2) Construction Method Statement/ Construction Logistics Plan Compliance
- 3) Highways works to be carried out and completed prior to occupation.
- 4) SUDS
- 5) No food shall be cooked on the premises, other than the warming or heating up of pre-prepared food.
- 6) No musical instrument or sound amplification equipment shall be used outside of the building.
- 7) Compliance with Ecological Assessment.
- 8) Control of school opening hours, and restricting out of school hours use of the site to between 7am and 10:30pm.
- 9) AH Units and Plant Control
- 10) Compliance with Noise Impact Assessment.

- 11) Construction Dust Risk Assessment Compliance.
- 12) Arboricultural Impact Assessment and Method Statement Compliance
- 13) Community Use of Park Hill Junior School Facilities.
- 14) Control of Light Pollution and Nuisance.
- 15) Boiler Specification.
- 16) School Travel Management Plan.
- 17) Travel Plan to include 'no idling engines strategy' and informal parking management.
- 18) Temporary Planning Permission and Buildings removal and landscaping including Tree Reinstatement.
- 19) Secure by Design
- 20) Cycle Parking
- 21) Servicing
- 22) Any other planning condition(s) considered necessary by the Director of Planning and Strategic Transport.

Informatives

- 1) Removal of site notices
 - 2) Any other informative(s) considered necessary by the Director of Planning
- 2.3 That the Planning Committee confirms that it has paid special attention to the desirability of preserving setting of surrounding listed buildings and features of special architectural and historic interest as required by Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 2.4 That the Planning Committee confirms that adequate provision has been made, by the imposition of conditions, for the preservation or planting of trees as required by Section 197 of the Town and Country Planning Act 1990.

3.0 PROPOSAL AND LOCATION DETAILS

Proposal

- 3.1 Planning permission is sought for the change of use of the site from playing fields (D2) to temporary secondary school (D1) until 31st December 2020 for 360 pupils, with associated erection of a temporary three storey school building, car parking, cycle store, fencing, bin stores, soft and hard landscaping.
- 3.2 At present on the site there is a two storey temporary school building which is in use by 180 pupils, which was approved under LBC Ref 17/05830/FUL in April 2018. This planning permission will expire in September of this year. When this planning permission was approved, it was hoped by the applicant that the temporary school would decant temporarily into the sports hall of the permanent school.



Image 1 – Site proposed layout plan

- 3.3 Planning permission (LBC Ref 18/01711/FUL) for a permanent school for 1680 pupils was granted on the 24th January 2019. The application and associated issues that it generated were more complex than initially forecast which led to a delay in determination of the planning application, which in turn meant that it was no longer possible for the temporary school to decant into the permanent school building by September of this year. The current planning application, if approved, would allow the school to continue to operate and expand whilst the permanent school is under construction.

Site and Surroundings

- 3.4 The application site is a 10.57 hectare area of land located at the junction of Coombe Road (A212) and Melville Avenue. The site prior to May 2017 consisted of a dilapidated and boarded up changing room pavilion, playing fields, access road and a small gravel/concrete car park. At present, the site contains a two storey pre-fabricated school building, with associated car parking, cycle stands, bin stores, fencing, soft and hard landscaping. This temporary school use is due to expire in September 2019. Access into the school for pedestrians is from an existing path at the corner of Melville Avenue and Coombe Road and via a vehicle entrance off Melville Avenue. There are a significant number of trees within the site and a significant change of land levels across the site, with the land rising to the south and east.



Image 2 – Current one way junction at Melville Avenue/ Coombe Lodge, and entrance to school

- 3.5 The site is bound to the north by Coombe Road, to the west by Melville Avenue, to the south by Coombe Wood and residential dwellings and to the east by 100/102 Coombe Road and the Grade II listed Coombe Lodge. The surrounding area comprises a mix of residential, woodland and green open space.



Image 3 - Ariel Photo of Site and Surroundings

- 3.6 The site was previously part of the Metropolitan Green Belt, but was de-designated on the 27th February 2018 as part of the formal adoption of the Croydon Local Plan 2018. The site is still surrounded to the north, east and south-west by land designated as Metropolitan Green Belt.
- 3.7 The site is in close vicinity to the following listed buildings/structures whose setting could be impacted by the development: Coombe Lodge (Grade II), Lodge

to Coombe House (St Margaret's School) (Grade II) and Coombe House (St Margaret's School) (Grade II). The site is adjacent to the following locally listed historic park and gardens: Geoffrey Harris House/Coombe House, Lloyd Park and Royal Russell School.

- 3.8 The site is located within Flood Risk Zone 1, as defined by the Environment Agency. The site is modelled as being at risk from surface water flooding on a 1 in 100 year basis. The site is located within an Archaeological Priority Zone. The southernmost part of the site is located in a Site of Nature Conservation Importance.
- 3.9 Due to the size of the site, the Public Transport Accessibility Level (PTAL) varies between 2 (poor) and 0 (worst). The entrance to the site has a PTAL rating of 1b (very poor). Despite the poor PTAL rating, the site is within a short walk of Lloyd Park Tram Stop and a reasonable walking distance from two bus service routes on Croham Road.

Relevant Planning History

Temporary School

- 3.10 Planning permission (LBC Ref 17/05830/FUL) was granted on the 12th April 2018 for the 'Change of use of the site from playing fields (D2) to temporary secondary school (D1) until September 2019 for 180 pupils, with associated erection of a temporary two storey school building, car parking, cycle store, bin store, fencing, soft and hard landscaping'. This planning permission has been implemented.
- 3.11 An application for a non-material amendment (LBC Ref 18/03639/NMA) was approved on the 16th August 2018. The application made a number of non-material amendments to the April 2018 planning permission; including changing the form and design of the temporary accommodation, introducing stair pods and reducing the building's footprint.
- 3.12 A further application for a non-material amendment (LBC Ref 19/00291/NMA) was approved on the 15 February 2019. - including changes to the car parking/cycle spaces, hard and soft play areas and fence line.

Permanent School Planning Permission

- 3.13 An Environmental Screening Opinion (LBC Ref 18/00389/ENVS) was issued on 12th February 2018 – concluding that the new permanent school development did not have the potential for significant environmental impact, so an Environmental Impact Assessment was not required.
- 3.14 Planning permission (LBC Ref 18/01711/FUL) was granted on the 24th January 2019 for the 'Change of use of the site from playing fields (D2) to secondary school (D1) for 1680 pupils (1200 pupils 11 to 16 and 480 pupils 6th form) eight form entry secondary school, with associated erection of two/three storey high secondary school with associated separate sports hall building, with connected access, hard and soft landscaping, car parking, all weather pitch and sports

areas and other ancillary facilities". This development, at the time of drafting this report, has yet to commence on site. It is understood that the applicant is currently preparing the site and welfare facilities, with development currently scheduled to formally commence on the 1st April 2019.

4.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The site has been designated for use as a Secondary School with the retention of playing pitches under the Croydon Local Plan (2018). The development is important in addressing the borough's deficit in school places that is forecast to become an issue – 2019 onwards – and the additional school places represents a significant public benefit.
- The proposed development would result in small loss of playing field area. To offset the small impact that this temporary development has on playing field and sport provision in the borough, the applicant proposes community use of Park Hill Junior School facilities.
- The proposed development has a simple, appropriate form that is acceptable given the temporary nature of the development. The significant public benefits of the development outweighs any harm to surrounding designated and non-designated heritage assets.
- The development would not have an unacceptable impact on amenities of neighbouring properties. Conditions are recommended to ensure that the impact of the development is appropriately mitigated and controlled.
- The development would be subject to conditions, so as not to cause unacceptable harm to the transport network, highway and parking. Public safety including that of pupils would be safeguarded.
- The proposal would incorporate sustainable urban drainage and not increase flood risk in the surrounding area.
- The visually prominent trees on the site would be retained and protected. Trees will be replanted after the temporary planning permission has expired to compensate for the loss of trees as a result of the development. The proposed development would safeguard protected flora and fauna.

5.0 CONSULTATION RESPONSE

5.1 The views of the Planning Service are expressed in the MATERIAL PLANNING CONSIDERATIONS section below.

The following were consulted regarding the application:

Greater London Authority (Statutory Consultee)

The GLA has assessed the application; given the scale and nature of the proposals they are satisfied that it does not give rise to any new strategic planning issues.

They have confirmed that the application does not need to be referred back to them prior to decision.

Transport for London (Statutory Consultee)

Car parking should be reduced by two car parking spaces to 13 car parking spaces. Informal car parking that occurs on the site should be removed. However, in light of the fact that there is no maximum parking standards for schools, TFL raise no objection subject to informal car parking being controlled through the school travel plan.

TFL have no objection to level of cycle parking provision or impact of the development on tram services capacity. TFL wish to engage in further dialogue with the applicant in regards to construction.

[OFFICER COMMENT] - Informal car parking on the site is recommended to be controlled through the school travel plan. The applicant is working with TFL to address their concerns in regards to construction prior to committee. In the event that it is not resolved prior to committee, then it is considered that this matter could be resolved via condition. Any update will be provided within the Committee Addendum.

Sport England (Statutory Consultee)

The provision of the buildings on this site does not accord with Sport England's Playing Fields Policy or the NPPF. However, planning permission for the permanent school was granted and that application was not called-in by the National Planning Casework Unit (LBC Ref 18/01711/FUL). Sport England do not wish to further delay the provision of the new playing fields and sports facilities.

As a result Sport England do not object to the application subject to two conditions being placed on the planning permission:

- Reinstatement of playing fields after temporary planning permission has expired in the event that the permanent school application does not get built.
- Community use agreement for off-site sport facilities at Park Hill School including access to playing field, ancillary parking and access to toilets.

[OFFICER COMMENT] - Conditions in line with Sport England's request are recommended.

Lead Local Flood Authority (Statutory Consultee)

The LLFA have objected to the application on the basis of lack of information. The applicant is working with the LLFA to address their concerns and it is expected that by the date of committee their concerns would have been addressed. Any update will be provided within the Planning Committee addendum.

6.0 LOCAL REPRESENTATION

6.1 A total of 41 neighbouring properties were notified about the application and invited to comment by the way of letter. The application has been publicised by way of two site notices displayed in the vicinity of the application site. The application has also been publicised in the local press. The number of representations received from neighbours, local groups etc in response to notification and publicity of the application were as follows:

No of individual responses: 17 Objecting: 17 Supporting: 0 Commenting: 0

6.2 The following Councillor made representations:

- Councillor Maria Gatland (objecting) – Concern over the pupil safety getting to and from the school, impact of construction on residents of Melville Avenue and other local roads, and increased impact of parking problems.

The following issues were raised in representations that are material to the determination of the application, and they are addressed in substance in the next section of this report:

Objections

- Lack of consideration for the safety of the pupils using nearby roads.
- No need for school
- Supervising staff that were meant to be at Coombe Road on the previous temporary accommodation have not always been present.
- Parents dropping/picking up pupils do not follow the highway code and make the site unsafe. There should be a pick up/drop off zone within the school.
- Toucan crossing and other highway works approved under the permanent scheme should be installed now due to safety risk to children.
- Increased noise disturbance to local residents.
- Nothing in the application that alleviates parking problems experienced.
- The removal of trees to facilitate cycle parking is not necessary as the existing cycle racks are not used.
- Construction should occur from Coombe Road as using local roads is not appropriate.
- Not clear how this scheme will be constructed at the same time as the permanent school, and concern over safety due to this potential conflict.
- Concerns over the impact of construction on the amenities of pupils inside the school. Construction also poses a safety risk.
- Dust, Noise and vermin issues
- Concern over construction routing of vehicles along Castlemaine, along Ballater Road and down Melville.
- Location of buildings on the site is not appropriate as it causes too much suffering to residents.

The following issues were raised in representations, but they are not material to the determination of the application:

- Issues in the connection with the acceptability of the permanent school planning permission.

7.0 RELEVANT PLANNING POLICIES AND GUIDANCE

- 7.1 In determining any planning application, the Council is required to have regard to the provisions of its Development Plan and any other material considerations. Details of the relevant policies and guidance notes are attached in Appendix 1.
- 7.2 Government guidance is contained in the National Planning Policy Framework (NPPF (2019)), revised in February 2019. The NPPF (2019) sets out a presumption in favour of sustainable development, requiring that development which accords with an up-to-date local plan should be approved without delay.

Development Plan

- 7.3 The Development Plan comprises the London Plan 2016, the Croydon Local Plan 2018, and the South London Waste Plan 2012.
- 7.4 A replacement Draft London Plan has been subject to public consultation, and Examination in Public commenced in January 2019. The current 2016 London Plan is still the adopted Development Plan, and although the Draft London Plan is a material consideration in planning decisions, at present it carries limited weight.

Supplementary Planning Guidance (SPG) / Document (SPD)

- 7.5 The relevant SPGs and/or SPDs are listed in Appendix 1.

8.0 MATERIAL PLANNING CONSIDERATIONS

- 8.1 The main planning issues raised by the application that the committee must consider are:

- Principle of Development/Land Use.
- Townscape and Visual Impact, Impact on Heritage Assets.
- Impact on Neighbouring Properties Living Conditions.
- Impact on Highway, Parking, Transport Network and Pedestrian Safety
- Trees, Landscaping and Biodiversity.
- Flooding, Sustainability and Environment.
- Health.
- Equality.

Principle of Development/Land Use

Metropolitan Green Belt

- 8.2 The application site is no longer located within the Green Belt. The site was removed from the Green Belt as part of the adoption of Croydon Local Plan (2018).

Positive Weight to Schools

- 8.3 Policy 3.18 of the London Plan (2016) states education and skills provision will be supported, including new build to change of use to education purposes. The policy states proposals which address the projected shortage of secondary school places will be particularly encouraged. Policy SP5 of Croydon Local Plan (2018) is supportive of investment to new schools and the expansion and improvement of existing schools. Croydon Local Plan (2018) has allocated the site (no.662) as 'secondary school with retention of playing pitches'.

Ensuring Sufficient Secondary School Places

- 8.4 There is an urgent need to increase primary and secondary school capacity in Croydon to meet the rising population. Croydon as of 2011 is the largest borough in London in terms of population and is expected to grow by further 30,000 people by 2031. The Council has a statutory duty to ensure that there are sufficient school places to meet demand. In addition to this, a 5% to 8% surplus in school places is required in order to ensure that the Council is able to offer a place to every child who moved into the borough outside of the normal points of admission. The 2016 School Capacity Survey forecasts that in 2018, there would be a surplus of just 71 places, which amounts to just 2%. A deficit in school places is forecasted to start to occur from 2019/20. The scheme would play a fundamental role in addressing this deficit and represents a significant public benefit.
- 8.5 Whilst the proposal presented here is only for a temporary period up to December 2020, the development (if approved) will help to ensure that a permanent school is established at this site which would make a substantial contribution to addressing the shortfall.

Sports Pitches

- 8.6 Paragraph 97 of the NPPF (2019) states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:
- a) an assessment has been undertaken which has clearly shown the open space, building or land to be surplus to requirements; or
 - b) 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; or
 - c) the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss of the current or former use.
- 8.7 Also of relevance is London Plan (2016) Policies 3.19 and 7.13 and Croydon Local Plan (2018) policy SP7.3 (d).

- 8.8 The proposed temporary school building would largely be located on the pre-existing hard surface. The only encroachment onto the grassed areas of the site would be the hard/soft play area, the car park area, perimeter fencing, drainage trench, cycle and bin storage. This represents a very small percentage of the overall site. Nevertheless to offset the limited impact, the applicant has agreed (in line with Sport England's request) to allow community use of the facilities at Park Hill Junior School, Stanhope Road. On this basis, the development's relatively small impact on the borough's sport provision and playing fields is deemed acceptable.

Townscape and Visual Impact, Impact on Heritage Assets

Heritage Assets

- 8.9 Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990 requires Local Planning Authorities to have special regard in the granting of planning permission to the desirability of preserving listed building(s) or its setting or any features of special architectural or historic interest which it possesses.
- 8.10 The site is located close to the grade II listed Coombe Lodge, and the Coombe Estate (Lodge, House and Ice House all listed separately at grade II). Lloyd Park previously formed part of the Coombe Estate and is a locally listed historic park and garden. The site itself appears from historic mapping to have formed agricultural land, likely associated with the Coombe Lodge Estate.
- 8.11 The openness of the site is significant in distinguishing the historic estates of Coombe (and their associated surviving heritage assets) from surrounding suburban development and provide an understanding of the historic setting of Coombe Lodge. The provision of a three storey temporary school and associated structures would erode some of the open and green character of the site. Coombe Lodge is visible from the site, but views are extremely limited and the main frontage does not orientate towards the site. Any adverse impact on heritage assets would be temporary. The proposal would have some harm, but less than substantial harm, on the setting of the designated and locally designated heritage assets.
- 8.12 The previous temporary application, as well as the permanent application was reviewed by Historic England's Greater London Archaeological Advisory Service (GLAAS), whom have concluded that both developments would not have a significant effect on heritage assets of archaeological interest. This would remain the same for the proposed development.
- 8.13 Paragraph 196 of the NPPF (2019) advises that where a development leads to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal. This paragraph should be read in the context of Paragraph 193 of the NPPF (2019) which states 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation.'

8.14 The proposed development provides substantial public benefits, which would comfortably outweigh the less than substantial harm identified to both nationally (even when great weight is applied to ensuring the asset's conservation and statutory requirements set out in Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990) and locally designated heritage assets.

Bulk, Mass and Design

8.15 The proposed temporary building would largely be located on the existing hardstanding, which would help to reduce the development's impact on the green open areas and playing fields. The location of the development also maximises the existing infrastructure present on the site, limiting the need for further ad-hoc potentially intrusive alterations. The proposed development would be well-sited away from neighbouring properties and set back from the road, which would help to retain a sense of openness, as well as limiting the building's impact on the most common viewpoints. It has a simple functional form that is reflective of its temporary nature. Mature boundary planting and the topography of the site will help to obscure the lower levels of the building from views from the north, helping to reduce the building's impact. Whilst the architectural quality and design detailing is not as high as the Council would normally require for a permanent solution, given its temporary nature and intended purpose, no objection is raised. The building is proposed to be painted in a green colour which would help to integrate into its green and pleasant setting.



Image 4 – Front/South Proposed Elevation

8.16 The proposed school is fit for purpose and designed to meet all guidelines and minimum school sizes as set in the Building Bulletin 103: Area Guidelines for Mainstream Schools. Disabled facilities would be provided within the school with a disabled parking space, shallow DDA compliant ramp, accessible toilet and adequate corridor widths. There is also a lift that provides level access to the upper floors. The proposed development will meet M4 (1) Building Regulation standards for accessibility.

8.17 The location of the building and condensed built form will help to ensure that when the use ceases, the land can be returned to a state – linked and related to the permanent school. Alternatively, the site could be returned to its pre development state. At the same time, the location and siting of the development has been chosen in order to allow the efficient construction of the permanent school. The proposed mass, bulk and design of the development on balance is acceptable.

Impact on Neighbouring Properties Living Conditions

- 8.18 The proposed temporary building would be located over 125m away from residential properties in Melville Avenue to the west, and 100 and 102 Coombe Road to the east. The proposed temporary building as such would not impact neighbouring properties' sunlight, daylight, sense of enclosure or privacy.
- 8.19 The principle impact of the development would be from intensification of the use of the wider site and associated impacts in terms of noise generation and privacy loss.
- 8.20 The proposed development would have an acceptable impact on neighbouring residential properties in terms of noise. The development benefits from the fact that school operating hours would be during the less noise sensitive daytime hours, when residents are less likely to be asleep and when general activity and background noise levels are at their highest. Some of the sound generated from the school use would be masked by existing traffic noise from the busy Coombe Road. Soft and hard playground areas have been located away from the neighbouring properties as much as possible, which will help mitigate their impact. Fencing is proposed around the access routes which would help to confine activity and associated noise from comings and goings. There would be staff/parental supervision at the entrance of school at the start/end of the day, which would help to control pupil behaviour. Any noise from the use of the sports pitches by either pupils or members of community, would be confined to daylight hours (due to the lack of floodlights) and comparable to the noise that would be expected to be generated from the existing use of the site.
- 8.21 The proposed development would have an acceptable impact on neighbouring properties' privacy. Intensely used areas of the site including play areas are located away from neighbouring properties boundaries, and fencing will restrict movements so that pupils are unlikely to be able to stand directly facing neighbours windows when entering and leaving the school. Views obtained from the use of the sports pitches themselves would be comparable to the existing situation, and not sufficiently detrimental to justify the refusal of planning permission.
- 8.22 In order to make the school safe for use in the winter, greater levels of external lighting would be required. To ensure the impact of this is appropriate mitigated and controlled, a condition has been recommended in regards to this.
- 8.23 The applicant's noise survey indicates that mechanical ventilation may be required to achieve acceptable sound levels within the temporary classroom. Conditions to ensure that plant/ventilation system would not cause harm to neighbouring properties' living conditions.

Impact on Highway, Parking, Transport Network and Pedestrian Safety

Trip Mode

8.24 The table below shows the results of predicted modal share for trips by pupils as part of the original temporary planning permission (17/05830/FUL), compared against the results of a 'hands up survey' survey that was undertaken by the applicant in November 2018.

	Predicted	Survey
Car	36	33
Car Share	9	3
Park and Stride *		1
Rail *		4
Tram	36	77
Public Bus	36	31
Cycle	9	0
Walking	54	31

Car	45	37
Non Car	135	143

*Extra categories added as part of hands up survey

Table 1 – Pupils travel to the site

8.25 A higher level of sustainable transport modes are being used to reach the school than were expected by pupils which is positive. Although no cycling was recorded from the hands up surveys, one pupil was observed cycling to the school by the applicant as part of their site visit observations.

8.26 Based on the hands up survey, it is reasonable to predict that additional 34 car journeys (inclusive of park and stride) would be made to the site by pupils as a result of the development. However, there is potential that this number could be lower as half of the pupils would be a year older (i.e. aged between 12 and 13) and therefore more likely to take independent travel to the site.

8.27 In terms of staff, it was forecasted at YR 1 (based on Census data) that ten staff would be employed, six of which would travel to the school by car, two by bus, one by rail and one by foot. In reality, the applicant's transport assessment indicates that seventeen FTE staff are employed. Based on survey results of these staff it is predicted that twelve would come by car, one by rail, one by tram, one by motorcycle and one by bike. The applicant estimates that the additional nine staff employed by the development, that six would come by car, one by rail, one by tram, one by motorcycle and one by bike.

	Predicted	Survey modal share %	No of existing staff travel*	Total Estimated for development
Car	6	69%	12*	18*
Bus	2	0%	0	0
Rail	1	8%	1*	2*
Tram	0	8%	1*	2*

Motorcycle	0	0%	1*	2*
Cycle	1	8%	1*	2*
Walking	0	0%	0	0

Table 2 – Staff modal share (* figures have been rounded due to nature of survey data)

Parking/Pick up/ Drop Off

- 8.28 There are no parking standards set out in the London Plan (2016) for education institutions and therefore any parking provision needs to be considered on an individual application basis.
- 8.29 The proposal would provide 15 formal parking bays, which includes 1 disabled bay and 2 mini bus spaces. A total of 12 car parking spaces would therefore remain for staff. In addition, the grass areas would continue to be used as an informal staff parking overspill area. This informal overspill parking area has the capacity for approximately 6 cars. As per Table 2, 18 staff are expected to drive to the site and therefore there is sufficient space on site for all staff cars to park. There is no motorcycle provision, but this is not considered to be a significant issue due to the nature of motorcycles that make them easier to park in ad-hoc locations within the site and it likely to be rare that there would be 100% occupancy of parking bays. The monitoring and managing of the informal parking to ensure that sustainable travel measures are sufficiently promoted and car use is reduced, is recommended to be achieved through the travel plan. There would be no visitor parking on the site; instead visitors would be directed to use the parking facilities at Lloyd Park. The development is considered to have an appropriate level of parking provision, which would limit the impact of the development on parking stress.



Image 5 – Site Layout Including Car Parking (to be updated)

- 8.30 As with any school, pupils arriving and leaving by car present a significant challenge. To address this the applicant is proposing a number of measures to encourage good behaviour and sustainable travel. The measures implemented at site to date have been successful in that 79% of pupils are arriving by sustainable non car based modes, exceeding predictions. A number of additional more stringent measures are proposed through the travel plan to further help mitigate the impact, including the introduction of home/school agreements that

will make parents commit to using sustainable modes of transport, or where this is clearly not possible, then using the Lloyd Park car park for drop off and pick up.

- 8.31 The development is likely to lead to increased pressures on parking and highway operation, but these aspects need to be balanced against the undeniable benefits of the application and should be viewed alongside the measures the school is progressing to reduce this impact and to discourage car use in order to promote sustainable modes of transport. On this basis, no objection is recommended to be raised subject to conditions.

School Travel Plan

- 8.32 A school travel plan has been submitted with the application. The travel plan has been produced in line with TFL STARS method. The school through its first year of operation is already on target to deliver Bronze accreditation. The submitted travel plan seeks to achieve Silver level of accreditation. The travel plan will be regularly monitored and reviewed. The travel plan targets a 45% reduction in the total number of single pupil car journeys to the site largely through the promotion of cycling, walking and car share. The travel plan also targets a 33% reduction in staff traveling to the site by car. The travel plan is recommended to be secured via condition.

Tram Network Impact

- 8.33 The application has been reviewed by Transport for London (TfL) who are satisfied that there is enough capacity on the tram network to cope with the demand generated by the development.

Highway Capacity Impact

- 8.34 The impact of the development on Coombe Road/Melville Avenue junction has been modelled. The model demonstrates that there would be a small increase in delay by 6 seconds to a total of 61 seconds in cars turning out of Melville Avenue into Coombe Road, but the queue length would be short with the equivalent of 3 car length queue in the morning (8 to 9am). The queue length in the afternoon (3pm to 4pm) is modelled to be on average less than 1 car, with a predicted delay of 25 seconds. The model sufficiently demonstrates that the highway will continue to operate efficiently. The model also helps to demonstrate that the pedestrian crossing at the junction will continue to operate safely (particularly for pupils crossing) with the level of traffic likely to limit traffic speeds at the junction. The relatively short "wait-time" should not encourage dangerous manoeuvres.

Cycle Parking

- 8.35 The two existing cycle stands would remain on the site and provide cycle parking for 40 cycles. London Plan standards that are based on pupil numbers requires 54 cycle spaces to be provided. However, in surveys it is noted that the current uptake of cycling is very low, with only 2 bicycles noted using the facilities from

the applicant's site visit. The level of cycle provision proposed by the applicant is appropriate to cope with the demands of the development.

Highway Alterations and Pupil Safety

- 8.36 To ensure that there is a safe crossing point for pupils/pedestrians to reach the school from the west, the applicant is proposing to retain the existing temporary pedestrian crossing and one way system at the junction of Coombe Road and Melville Avenue. The applicant has carried out a safety review of the junction which included on site observations and no significant safety concerns were found. Staff supervision in line with the previous planning permission requirements was observed helping to ensure the designated safe routes to the school were followed and to help ensure good (safe) behaviour of the pupils. Adequate capacity to cope with the additional pupil numbers was also identified on surrounding pavements, including on the well-used southern footway of Coombe Road. Officers are satisfied that pupils will continue to be able to get to and from school safely subject to condition securing the continuation of the one way/pedestrian crossing arrangement. It is understood that one way arrangement is generally welcomed by local residents, as such it is understood that the Highways Department will be seeking (through the necessary Section 284 Highway Agreements and TRO processes) to make the one way/crossing arrangement permanent.
- 8.37 It is noted that many of the objectors are of the view that the highway works that will need to be carried out for the approved permanent school application (LBC Ref 18/01711/FUL) namely the installation of a Toucan crossing and associated road alignment, should be implemented now. Notwithstanding the fact officers are satisfied that the continuation of the one way and pedestrian crossing is safe for the development proposed, it is highly unlikely that these works could be completed by September in time for the school opening. The highway alterations proposed as part of the permanent application are significant and costly and consequently, there is a substantial lead in time; particularly with getting TFL to schedule and install the Toucan crossing. Nevertheless, the applicant has provided a letter indicating that they will do what they can to deliver the Toucan Crossing ahead of schedule and as early as possible.

Construction Impact

- 8.38 A draft Construction Logistics Plan (CLP), which has been reviewed by both council officers and TFL. Some minor amendments are required to this document that are recommended to be secured via condition.

Trees, Landscaping and Biodiversity.

Trees

- 8.39 The important high quality hornbeam trees at the entrance of the site would be retained. A number of B and C category trees were removed as a result of alterations carried out in connection with the temporary 1st year school and a condition was applied requiring a tree reinstatement planting scheme to be

approved and implemented upon ceasing of the temporary use. The continuation of this condition is recommended which will ensure that long term visual amenity would not be harmed and potentially enhanced as a result of the temporary planning permission. The construction of the development will not cause harm to these important Hornbeam Trees as there is a sufficient gap between their canopies following pruning works carried out in the summer of 2018. The proposed development has an acceptable impact on trees.

Ecology and Biodiversity

- 8.40 The proposed development would not directly impact the more sensitive woodland area that is located at the southernmost part of the site, ensuring any flora and fauna, including protected species located in this habitat are unlikely to be impacted.
- 8.41 A number of mitigation and enhancement measures are outlined within the ecological appraisal, and these are recommended to be secured by condition.

Flooding, Sustainability and Environment.

- 8.42 The site is modelled as being at risk from surface water flooding on a 1 in 100 year basis. The existing and proposed impermeable areas including from the proposed building would discharge directly into an infiltration trench. Whilst the LLFA have currently objected to the application and have requested more information, it is expected that their concerns will be addressed prior to committee. An update will be provided in the addendum.

Sustainability and Energy

- 8.43 The development is only for a temporary period and therefore it is not practical to require the development to meet standard sustainability and energy standards. Nevertheless there are a number features of the development that reduce its environment impact. The temporary accommodation is proposed to be constructed from pre-fabricated and pre-used modular units. The proposed re-use of modular units will give significant savings in terms of embodied carbon compared to a traditional build project and consequently contributes to climate change mitigation. The pre-built nature of the development would also significant limit construction impacts and reduce vehicle movements.
- 8.44 The temporary modular units are well insulated, air tight, utilise natural ventilation when units need to be cooled and natural lighting which helps to ensure energy efficiency.
- 8.45 In light of the nature of the development, the impact of the development in terms of sustainability, energy and carbon dioxide emissions is considered acceptable.

Air Quality

- 8.46 The submitted Air Quality Assessment considers the impact of locating the school adjacent to Coombe Road and the impact that this may have on health

and well-being of pupils/staff. The assessment concludes based on three months of monitoring, the site is suitable to be used as a temporary school and that on-site mitigation measures are not necessary. The assessment also looks at location of the playground (in particular the playground closest to Coombe Road) and concludes that there is no significant air quality safety risk. The school will continue to liaise with the contractor for the permanent school to ensure that all reasonable measures to reduce the impact of construction on school pupils will be implemented.

- 8.47 Due to the nature of the development there are only limited options in terms of air quality. Mitigation measures commensurate to the scheme and scale of the development are proposed. The developments impact on air quality is acceptable.

Land Contamination

- 8.48 The reports submitted in connection with the application are sufficient to demonstrate that there are no significant land contamination risks.

Health

- 8.49 The proposed school with its sports focus would actively promote health and well-being. Measures such as the Travel Plan are proposed to ensure that active travel is promoted. Sufficient measures are proposed to ensure the development does not have an unacceptable impact in terms of emissions or air quality.

Equality

- 8.50 The school would be a 'Free School' and are an 'all-ability' schools that cannot use academic selection process. The proposed school is also not a 'faith school', would be open to all sexes and gives first choice to local families. The school would have to operate in accordance with the Equality Act 2010.
- 8.51 Regard has been had to the impact of the development on pupils of Rutherford School, which is a specialist independent school for pupils with Profound and Multiple Learning Disabilities. The small impact that the development could have on the operation of the Rutherford School, would be outweighed by the benefits of providing a new school that could cater for broad range of pupils.

9.0 Balance of Decision and Conclusion

- 9.1 Given the positive weight given to schools, the site allocation that establishes the education use of the site and the need for additional secondary school places within South Croydon, these circumstances would comfortably outweigh the less than substantial harm identified to both nationally and locally designated heritage assets, even when great weight is applied to ensuring the asset's conservation, and the effects of the functional architectural quality of the development on visual amenity.

- 9.2 The development would by virtue of its nature would have an adverse impact on the efficient operation of the highway particularly during start/end of the school day and would increase parking stress. However, this has to be balanced against the significant benefits that the development provides, and also viewed in light of the fact the applicant is implementing measures to reduce their impact and promote sustainable modes of transport. The development as such is considered acceptable in this regard. The proposed development would not compromise pedestrian or pupil safety.
- 9.3 In conclusion, the proposed benefits of the application namely the provision of additional school places are considered to comfortably outweigh the negatives expressed above, and as such Planning Permission is recommended to be granted.
- 9.4 All other relevant policies and considerations, including equalities, have been taken into account.

Appendix 1: Planning Policies and Guidance

The following lists set out the most relevant policies and guidance, although they are not exhaustive and the provisions of the whole Development Plan apply (in addition to further material considerations).

The main policy considerations from the London Plan 2016 raised by the application that the Committee are required to consider are:

Policy 1.1 Delivering the Strategic Vision and Objectives for London.

Policy 2.18 Green Infrastructure: The Multi-Functional Network of Green and Open Spaces.

Policy 3.1 Ensuring Equal Life Chances for All.

Policy 3.2 Improving Health and Addressing Health Inequalities

Policy 3.6 Children and Young People's Play and Informal Recreation Facilities.

Policy 3.16 Protection and Enhancement of Social Infrastructure.

Policy 3.17 Health and Social Care Facilities

Policy 3.18 Education Facilities

Policy 3.19 Sports Facilities

Policy 4.6 Support for and Enhancement of Arts, Culture, Sport and Entertainment

Policy 5.1 Climate Change Mitigation

Policy 5.2 Minimising Carbon Dioxide Emissions

Policy 5.3 Sustainable Design and Construction

Policy 5.7 Renewable Energy

Policy 5.12 Flood Risk Management

Policy 5.13 Sustainable Drainage

Policy 5.14 Water quality and wastewater infrastructure

Policy 5.15 Water use and supplies

Policy 5.17 Waste capacity

Policy 6.1 Strategic Approach

Policy 6.3 Assessing Effects of Development on Transport Capacity

Policy 6.9 Cycling

Policy 6.11 Smoothing Traffic Flow and Tackling Congestion

Policy 6.12 Road Network Capacity

Policy 6.13 Parking

Policy 7.2 An Inclusive Environment

Policy 7.3 Designing Out Crime

Policy 7.4 Local Character

Policy 7.6 Architecture

Policy 7.8 Heritage Assets and Archaeology

Policy 7.14 Improving Air Quality

Policy 7.15 Reducing and Managing Noise

Policy 7.16 Green Belt

Policy 7.19 Biodiversity and Access to Nature

Policy 7.21 Trees and Woodlands
Policy 8.2 Planning Obligations
Policy 8.4 Community Infrastructure Levy.

There is a new draft London Plan that is currently undergoing Examination in Public (EiP) which opened on the 15th January 2019. The GLA hope that the final London Plan will be published in Autumn of 2019. The current 2016 consolidation Plan is still the adopted Development Plan. However the Draft London Plan is a material consideration in planning decisions and will gain more weight as it moves through the process to adoption. At present the plan in general is considered to carry minimal weight.

Draft Policy GG1 Building Strong and Inclusive Communities
Draft Policy GG6 Increasing Efficiency and Resilience
Draft Policy D1 London's Form and Characteristics
Draft Policy D2 Delivering Good Design
Draft Policy D3 Inclusive Design
Draft Policy D10 Safety, Security and Resilience to Emergency
Draft Policy D11 Fire Safety
Draft Policy D12 Agent of Change
Draft Policy D13 Noise
Draft Policy S1 Developing London's Social Infrastructure
Draft Policy S3 Education and Childcare Facilities
Draft Policy S5 Sports and Recreation Facilities
Draft Policy S6 Public Toilets
Draft Policy E11 Skills and Opportunities for All
Draft Policy G6 Biodiversity and Access to Nature
Draft Policy G7 Trees and Woodlands
Draft Policy SI1 Improving Air Quality
Draft Policy SI2 Minimising Greenhouse Gas Emissions
Draft Policy SI3 Energy Infrastructure
Draft Policy SI5 Water Infrastructure
Draft Policy SI7 Reducing Waste and Supporting the Circular Economy
Draft Policy SI12 Flood Risk Management
Draft Policy SI13 Sustainable Drainage
Draft Policy T1 Strategic Approach to Transport
Draft Policy T2 Healthy Streets
Draft Policy T3 Transport Capacity, Connectivity and Safeguarding
Draft Policy T4 Assessing and mitigating transport impacts
Draft Policy T5 Cycling
Draft Policy T6 Car Parking
Draft Policy T6.5 Non-residential Disabled Persons Parking
Draft Policy T9 Funding Transport Infrastructure through Planning

Relevant Mayor of London Supplementary Planning Guidance

Social Infrastructure SPG
Accessible London: Achieving an Inclusive Environment SPG
Shaping Neighbourhoods: Character and Context SPG
Shaping Neighbourhoods: Play and Informal Recreation SPG
Sustainable Design and Construction SPG
Planning for Equality and Diversity in London SPG

Croydon Local Plan 2018

The main policy considerations from the Croydon Local Plan 2018 raised by the application that the Committee are required to consider are:

SP1.1 Sustainable development
SP1.2 Place making
SP1.3 and SP1.4 Growth
SP3 Employment
SP4 Urban design and local character
 DM10 Design and character
 DM13 Refuse and recycling
 DM16 Promoting healthy communities
 DM18 Heritage assets and conservation
SP5 Community facilities
 DM19 Providing and protecting community facilities
SP6 Environment and climate change
 DM23 Development and construction
 DM24 Land contamination
 DM25 Sustainable Drainage Systems and reducing flood risk
SP7 Green grid
 DM27 Protecting and enhancing our biodiversity
 DM28 Trees
SP8 Transport and Community
 DM29 Promoting sustainable travel and reducing congestion
 DM30 Car and cycle parking in new development
Places of Croydon
 DM46 South Croydon, Table 11.14, Site allocation 662

Relevant Supplementary Planning Guidance

SPG Note 12 – Landscape Design