
1.0 SUMMARY OF APPLICATION DETAILS

Ref:	18/01711/FUL
Location:	Coombe Lodge Playing Fields, Melville Avenue, South Croydon, CR2 7HY.
Ward:	South Croydon
Description:	Change of use of the site from playing fields (D2) to eight form entry secondary school (D1) for 1680 pupils (1200 pupils aged between 11 to 16 and 480 pupil 6th form), erection of two/three storey school building with separate two storey sports hall building, hard and soft landscaping, car parking, all weather pitch including floodlights and sports areas, and other ancillary facilities.
Drawing Nos:	FS0425-SRA-XX-ZZ-DR-A-00000 L01, 00200 L01, 00201 L01, TB-GF-GA-A-20100 L01, TB-01-GA-A-20101 L01, 02-GA-A-20102 L01, 03-GA-A-20103 L01, RF-GA-A-20104 L01, SP-GF-GA-A-20100 L01, -01-GA-A-20101 L02, RF-GA-A-20102 L02, EL-A-20200 L01, EL-A-20201 L01, 20202 L01, 20203 L01, 20204 L01, 20205 L01, SE-A-20300 L01, 20400 L01, 20401 L01, 20402 L01, 20403 L01, TB-00-DE-A-21622 P02, ZZ-DE-A-21608 P1, PLI-MP-XX-DR-L-90201 L03.
Applicant:	Wates Construction Limited
Agent:	Alan Gunne-Jones of Planning & Development Associates Ltd
Case Officer:	Barry Valentine

- 1.1 This application is being reported to committee as 18 objections above the threshold in the Committee Consideration Criteria have been received and because the Ward Councillor (Cllr Maria Gatland) made representations in accordance with the Committee Considerations Criteria and requested committee consideration.

2 BACKGROUND

- 2.1 This scheme was presented to committee as part of the pre-application process on 22nd February 2018. The following comments were raised by the committee during those presentations:

Design

- Positively welcomed the design and interest of the layout of the school and noted the intention of the landscape design which included an amphitheatre to help create a better environment.

- Should include views of the school from the road side and the park (longer distance views) to give an indication of its relationship to the wider setting. The school view from the hedge was acknowledged.
- A good understanding of the various site levels and the extent to which the scheme responds positively to the level changes.
- Welcomed the sports academy – and encouraged the full range of sports (including cricket).
- Ensure scheme deals with any nature conservation impacts – especially close to nearby woodland.

Community use of the school outside school hours

- Acknowledged the space (indoor and outdoor) should be maximised for “out of school hours” activities which would need to be properly determined and controlled through a community use protocol.

Pedestrian/Highway Safety

- High number of pupils attending nearby schools already use trams and other transport modes and the Committee queried the capacity of the trams and buses to accommodate further trips.
- Concern over road traffic speed on Coombe Road which is considered busy and dangerous with the need for mitigation (signage and other speed calming measures) – especially as cars move east to west.
- Careful thought needs to be given to pedestrian crossing arrangements on Coombe Road – striking an appropriate balance between pedestrian safety and the free flow of traffic.
- Need for formalised controlled crossing to ensure pedestrian safety – needs to be properly audited and carefully located on Coombe Road.
- Greater efforts needed to encourage cycling to and from the school (pupils as well as staff) especially as it is proposed to be a Sports Academy. Should be more ambitious to reduce reliance on the car and encourage more sustainable modes of transport - travel plan needs to be ambitious.
- Should address a proactive plan to encourage more walking and cycling. Cycling infrastructure was considered necessary to encourage the sport focused school; which should include Transport for London’s cycle guideline on cycle lanes.
- Need to consider separation of pedestrian and cycle lanes – possibly on the opposite side of Coombe Road (Lloyd Park).
- Vehicle visibility is important at the main vehicle entrances with the desire to retain important trees.
- Careful consideration required around arrangements for service vehicles.

On Site and On-Street Car Parking

- There was a difference of opinion about the most appropriate level of onsite car parking provision with some Members accepting relatively high levels on the basis that it would limit and mitigate on street car parking and pupil drop in neighbouring residential streets (which have limited car parking capacity). The alternative view was that the high level of on-site car parking would encourage unsustainable car trips and would do little to encourage more sustainable trips (including walking and cycling) to and from school by pupils and members of staff.
- On site drop off was welcomed to avoid indiscriminate drop off in Melville Road and Coombe Road – although there was an alternative view that large areas set aside for pupil drop off might be counter-productive, in view of the need to encourage sustainable travel to and from school.

Neighbour Impacts

- Need for the school to respect the amenities of neighbours (mitigate noise breakout through design of amenity areas and density of planting).

(OFFICER COMMENT: The points raised above are addressed in the main body of this report).

2.2 The scheme was presented to the Place Review Panel on the 18th January 2018. The PRP considered the scheme to be a well resolved response to the brief and site, the product of which is an excellent proposal for a school. In addition in summary they stated:

- The layout of the school is successful and works well to create a relationship between the inside and out. The sports hall needed to be made more prominent.
- Raised concerns about the practicality of pupils cycling to the school and new road entrance visibility from Coombe Road. The car park should also be designed to allow future expansion, with a green buffer needed between the car park and road.
- Façade of the hall presents a highly composed elevation to the front. More openings should be added.
- Welcomed the use of metal standing seam but its detailing is important. They did not support the use of render. The roof should be well designed.
- Community should be consulted, in particular in regards to traffic impact and community use.

3.0 SUMMARY OF KEY REASONS FOR RECOMMENDATION

3.1 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 start to occur from 2019, and this represents a significant public benefit.

- 3.2 The development would result in a net reduction of playing field area. However, this loss in officer's view is offset by increasing the range of sports capable of being played on the site, by making improvements in the quality of sport provision, increasing participation in sport and recreation, and ensuring that these benefits are spread to the widest range of the local population as possible. This would be secured through a community use plan.
- 3.3 The development would create a high quality well designed school that would complement the existing context. The scheme provides substantial public benefits, which would comfortably outweigh the less than substantial harm identified to heritage assets.
- 3.4 The development would not have a significant impact on amenities of neighbouring properties. Conditions are recommended to ensure that the impact of the development is appropriately mitigated and controlled.
- 3.5 The development provides an appropriate level of on-site car parking and drop off/pick up facilities, such that the scheme would promote sustainable modes of transport, without having an unacceptable impact on parking stress in neighbouring streets. Improvements are proposed to the cycling network including the provision of a Toucan crossing. A number of highway works are proposed which ensure pupil safety, but which would not have an unacceptable impact on highway capacity and traffic flow.
- 3.6 The impact on trees is appropriate given the importance of the development and the public benefits it provides. Replacement tree planting to mitigate any loss is recommended to be secured by conditions and legal agreement. The development would not have a significant impact on biodiversity, would not cause harm to protected flora and fauna, or the designated Site of Nature Conservation Importance.
- 3.7 The development would be sustainable, meeting the 35% CO2 reduction target and aims to achieve a BREAAAM Excellent rating. The development would not have an unacceptable impact on air quality or have an adverse impact on flooding.
- 3.8 The proposed highway works on the green belt and associated removal of trees are considered to be appropriate development as defined in the NPPF (2018). The works would preserve openness and do not conflict with the purposes of including land within the Green Belt.

4.0 RECOMMENDATION

4.1 That the Planning Committee resolve to GRANT planning permission subject to:

- A) Any direction by London Mayor pursuant to The Mayor of London Order.
- B) Any direction by the Secretary of State pursuant to the Consultation Direction.
- C) The prior completion of a legal agreement to secure the following planning obligations:
 - a) Highway Works and entering into S278 Agreement to cover all associated costs. Highway Safety Audits stage 1 to 4 to be carried out.
 - b) Tram Safety Works.
 - c) Street Tree Removal and Replacement.
 - d) Travel Plan and monitoring.
 - e) Air Quality Contribution.
 - f) Local Employment and Training Strategy and Contribution.
 - g) Financial contribution to feasibility study linking the future Lloyd Park cycle network to the application site.
 - h) Financial contribution £10,000 to fund new bus shelter on Croham Road.
 - i) Provision of off-site sports facilities – Junior Cricket Pitch.
 - j) Carbon offset payment.
 - k) Monitoring fees.
 - l) Any other planning obligation(s) considered necessary by the Director of Planning and Strategic Transport.

4.2 That the Director of Planning and Strategic Transport is delegated authority to negotiate the legal agreement indicated above.

4.3 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. Built in Accordance with Plans.
2. 3 Year Commencement of Development.
3. Demolition and Construction Method Statements and Construction Logistics.
4. Sustainable Urban Drainage Scheme.
5. Green Infrastructure Works to Northern Boundary (Air Quality).
6. Materials.
7. Design/Bay Section.
8. Detailed Drawings (balustrades, boundary treatments, flood lighting, school entrances and fencing to artificial pitch).
9. Render Maintenance.
10. Secure by Design.
11. Cycle Parking.
12. CO2 emissions – 35% Reduction.

13. BREEAM Excellent.
14. Compliance with Noise Assessment.
15. Noise Assessment to be carried out for bin store.
16. Delivery and Servicing Plan.
17. Compliance with Air Quality Assessment.
18. Internal Noise Levels.
19. Amplified Sound.
20. Community Use Agreement.
21. Design of Sport Hall.
22. Design of Artificial Pitch.
23. Artificial Pitch Standard.
24. Grass Pitch Standard.
25. Establishment of Cricket Square.
26. Management and Maintenance of Pitches.
27. Hours of Use for Community Facilities.
28. Hours of Floodlights/Service Yards Lights.
29. Air Handling Units.
30. Mechanical Ventilation and Odour.
31. Boiler/Flues impact on Air Quality.
32. Ecology Survey Report.
33. Electric Vehicle Charging Point.
34. Car Park Management Plan.
35. Undiscovered Land Contamination.
36. Ground Drainage.
37. Piling Works.
38. Thames Water Infrastructure Phasing Plan.
39. Removal of permitted development rights.
40. Restriction on Use to D1
41. Provision of New Trees.
42. Landscaping and Landscaping Privacy Measures.
43. Details of Hard Court Including Floodlights.
44. Any other planning condition (s) considered necessary by the Director of Planning and Strategic Transport.

Informatives

- 1) Removal of site notices.
- 2) CIL liability.
- 3) Construction site code of conduct.
- 4) Subject to S106.
- 5) Thames Water informative.
- 6) Land contamination watching brief informative.
- 7) Any other informative(s) considered necessary by the Director of Planning and Strategic Transport.

- 4.4 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.

- 4.5 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.
- 4.6 That, if by 27th January 2019 the legal agreement has not been completed, the Director of Planning and Strategic Transport is delegated authority to refuse planning permission.

5.0 PROPOSAL AND LOCATION DETAILS

Proposal

- 5.1 Planning permission is sought for the change of use from playing fields (D2) to eight form secondary school (D1) for 1,680 pupils (1,200 pupils aged 11 to 16 and 480 pupil 6th form), erection of two/three storey school building with separate two storey sports hall building, hard and soft landscaping, car parking, all weather pitch and sports areas, and other ancillary facilities.
- 5.2 It is intended for the school to gradually expand following the opening of temporary facilities at the start of September 2018 (17/05830/FUL), and be fully occupied by 2027 as follows:

Year	Year 7 Intake	Six Form Intake	Total Pupil no.
2018	180		180
2019	180		360
2020	180	150	690
2021	240	150	1080
2022	240		1350
2023	240	180	1440
2024	240	180	1500
2025	240	180	1560
2026	240	240	1620
2027	240	240	1680

- 5.3 By the time the school is fully occupied it is expected to have 150 staff including part time workers. This equate to 130 FTE staff.
- 5.4 It is intended for construction of the permanent school to start in autumn/winter this year. By September 2019 it is intended that the sports hall block be completed so that the school can move into it for teaching. It is hoped that the school would be fully completed by spring 2020.
- 5.5 There would be 96 car parking bays, six of which are designed for disabled drivers. In addition, four enlarged parking bays for mini buses, two coach parking bays and a layby for set down and pick up by car, mini bus and coach would be provided. The layby would have the capacity for up to eight cars.

Site and Surroundings

- 5.6 The application site is a 10.57 hectare area of land located at the junction of Coombe Road (A212) and Melville Avenue. The site consists of a dilapidated and boarded up changing room pavilion, playing fields, access road and small gravel and concrete car park. At the time of the site visit, four football pitches were marked out. Access to the car park is from the northern end of Melville Avenue and there is a pedestrian entrance at the junction of Coombe Road and Melville Avenue. There are a significant number of trees within the site and a significant change of land levels, with the land rising to the south and east.



Image 1- Site Location Plan

- 5.7 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 nos.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 2 – Ariel Photo of Site and Surroundings

- 5.8 The site was previously part of the 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 Green Belt.
- 5.9 The site is not in a conservation area and does not contain any listed buildings. There are no conservation areas within the vicinity of the site whose setting would be impacted by the development. 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.
- 5.10 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.
- 5.11 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

- 5.14 Planning permission reference 17/05830/FUL was granted on the 12/04/2018 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.
- 5.15 An Environmental Screening Opinion reference 18/00389/ENVS was issued on 12/02/2018 concluding that the new school development did not have the potential for significant environmental impact, so an Environmental Impact Assessment was not required.

6.0 CONSULTATION RESPONSE

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

The following were consulted regarding the application:

- 6.2 **Greater London Authority (Statutory Consultee)**

The stage one response made the following comments:

Principle

The evidenced educational need, enhancements to the retained playing fields (including community use agreement that must be secured through S106) and site designations adequately justify and off-set the net reduction to the existing playing fields.

Biodiversity

The applicant's environmental statement identifies that the existing site provides a suitable habitats for bats, badgers and nesting birds. Any impact to protected species must be fully mitigated, as outlined in the environmental statement. The applicant should investigate the feasibility of these measures.

(OFFICER COMMENT: The applicant has confirmed the recommendations set out in the environmental statement are feasible. These mitigation measures are recommended to be secured through condition)

Urban Design

The block will range between 2/3 storeys in height which responds positively to the low density and low rise surrounds. The scale minimises the impact of the development in linear views, which is supported. The layout of the scheme concentrates the development to the northern portion of the site fronting Coombe

Road (as per the existing arrangement) which provides natural screening to the playing fields which form the rear of the plot.

The built form of the proposal is contemporary and finished in high quality materials which provide a well-designed scheme. The Council must secure key details of facing materials, rooflines and any glazing. The overall height, massing, layout and elevational treatments of the scheme are broadly acceptable in strategic design terms. Having regard to the submitted plans and visualisations, and the characteristics of the wider area and urban setting, the proposals are in accordance with relevant policies.

The proposals have been developed to ensure that the school will be fully accessible at ground floor level. This is supported.

(OFFICER COMMENT: Materials/details are recommended to be secured via condition).

Sustainable Development

Energy efficiency: A range of passive design features and demand reduction measures are proposed. Air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. GLA have asked for more information with respect to energy calculations.

Heating and power: The applicant will need to ensure development is designed to allow future connection to a district heating network. Further details on the centralised plant room are required.

Renewable energy: The applicant is proposing to install Photovoltaic (PV) panels and Air Source Heat Pumps that will achieve a 54 tonne reduction (27%) reduction in Carbon Dioxide emission, which is welcomed.

(OFFICER COMMENT: The technical details requested by GLA have been provided, and officers are awaiting confirmation from the GLA that they are acceptable. The minor issues raised would be expected to be fully resolved to the satisfaction of the GLA prior to the issuing of stage 2 referral).

Transport

The additional demand for travel in the morning peak, related to the proposed school would be placed on two tram services, which are already over planned capacity. To ease congestion on the tram network, it is advised that the school should delay the proposed start time by at least 15 minutes to spread the demand from existing schools in the area. Further detail is required regarding measures to prevent pupils crossing the tram lines at informal points in line with the technical note provided to the applicant.

GLA Officers are satisfied that the demand for bus travel can be accommodated on the existing bus network. However, the safety of students waiting for buses on Croham Road is of concern. To ensure the safety of pupils, the applicant should implement measures to address these concerns, including staggered arrival and departure times for pupils.

A number of locations have been identified as sub-standard for cyclists in the vicinity of the site. It is acknowledged that whilst physical improvements have been provided for pedestrians, the proposed package of highway improvements should also provide measures to increase cycle safety.

Car Parking: Electric Vehicle Charging Points (EVCP) should be provided. The provision of car parking should be phased to avoid unnecessary over provision. The applicant must clarify how the pick-up and drop-off bay will be managed through a Car Parking Management Plan.

Cycle Parking: 226 cycle spaces should be delivered by the time the school is fully occupied.

Travel Plan: The submission of a draft school Travel Plan is welcomed and a final travel plan secured through a Section 106 agreement.

Servicing and construction: The detailed construction logistics plan/delivery and servicing plan must be secured by a planning condition and discharged in consultation with TfL and London Trams, prior to commencement.

(OFFICER COMMENT: Additional information and justification has been provided to the GLA that is considered to address their concerns. In regards to the EVCP, these have been provided in accordance with the London Plan. Given the early stage of the adoption of the draft London Plan, it would not be reasonable to require the number of EVCP points requested to be provided. A Car Park Management Plan is recommended to be secured via condition. The cycle parking spaces will be fully provided prior to full occupation and secured via condition. The travel plan is recommended to be secured via legal agreement. Conditions are recommended in regards to CLP and delivery and service plan.)

6.3 Transport for London (Statutory Consultee)

Following the submission of revisions TfL have raised no objection. TfL had originally objected to the proposal on concerns about the impact of an all signalised junction on traffic congestion, which was modelled to have resulted in queues of up to 412m. To address this concern the applicant amended the scheme so that only a single Toucan crossing is proposed on Coombe Road.

TfL have requested that further safety measures are installed at the existing temporary vehicle access point to Lloyd Park that runs over the tram, which is located at Melville Avenue/Coombe Road junction and the provision of a financial contribution to fund the provision of a bus shelter on Croham Road.

(OFFICER COMMENT: Both of the improvements to temporary vehicle access point and new bus shelter are recommended to be secured as part of the legal agreement.)

6.4 Sport England (Statutory Consultee)

Sport England objects; stating the proposal does not meet Sport England's policy, in particular exception 5 which allows support of applications when

"The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field'

They state that they welcome the benefits to sport that will be delivered by this application, but consider that the applicant could go further to ensure that the sport facility delivered will be of greater benefit to school and community sport in the locality, given the impact on this community playing field.

They have indicated that they may reconsider their position if

- 1) Provision is made for floodlit outdoor netball courts
- 2) Mitigation for the loss of the cricket pitches including:
 - Provision of additional non-turf pitch.
 - 8 pitch square should be provided instead of a 6.
 - Shelter for players.
 - Measures to ensure that the square is properly established.
 - Alternative adult pitches to be made available during the construction period.

(OFFICER COMMENT: The loss of playing field area would be offset through increasing the range of sports that are capable of being played on the site, through an improvement in the quality of sport provision and pitches, and by increasing participation in sport and recreation, as well as spreading the associated social and health benefits to the widest range of the local population through a community use plan.

The applicant has sought to address Sport England concerns by agreeing to provide hard courts including floodlights that would be suitable for netball prior to

full occupation. An area has been indicated for these adjacent to the proposed Sports Hall.

In regards to the eight pitch square, to implement this would require the loss of 1 junior football pitch. The difference in net loss between a 6 and 8 pitch square would be 10 games over a cricket season, whereas 1 junior pitch would have a far greater use over a football season. Given this, the applicant's position is considered by officers to be preferable and reasonable.

The applicant is unwilling to provide an additional non turf pitch or additional shelter for players close to the cricket. They have highlighted, as accepted by officers', that cricket was not heavily played at this site, with no cricket team having played at the site in the last three years. Given the low level of previous use, the reasonable level of cricket provision provided is deemed acceptable.

Measures to ensure that the square is properly established are recommended to be secured via condition.

In regards to alternative cricket pitch provision, the applicant has agreed to provide a junior cricket pitch at Park Hill Junior School that is recommended to be secured through the S106. Whilst Sport England do not consider this to be sufficient as it is not a full sized adult pitch, officer's consider the provision to be reasonable given that only informal recreational use is being displaced by the development. This is recommended to be secured via legal agreement.)

6.5 Lead Local Flood Authority (Statutory Consultee)

The LLFA have confirmed that they have no objection to the development subject to conditions being placed on the application.

(OFFICER COMMENT: Recommend to be secured via condition)

6.6 Historic England - Greater London Archaeological Advisory Service

GLAAS have raised no objection. They consider that no further archaeological work is necessary.

6.7 Natural England

Natural England have no comment.

6.8 Environmental Agency

Environmental Agency have no objection subject to conditions. No concentrations of potential contaminants were reported that would represent a significant risk to controlled waters.

(OFFICER COMMENT: Recommended to be secured via condition)

6.9 Metropolitan Police

The Police request conditions to follow the principles and physical security requirements of secure by design.

(OFFICER COMMENT: The applicant has confirmed they have no concerns regarding achieving Secure by Design accreditation and a condition is recommended)

6.10 Thames Water

Thames Water have advised they have no concerns with regard to surface water network infrastructure capacity and foul water sewage network infrastructure capacity. They have requested a condition to ensure that the existing water network infrastructure can accommodate the needs of the development.

(OFFICER COMMENT: A condition is recommended).

7.0 LOCAL REPRESENTATION

7.1 A total of 40 neighbouring properties were notified about the application and invited to comment by the way of letter. The application has been publicised by way of eight site notices displayed in the vicinity of the application site and has 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: 22 Objecting: 21 Supporting: 0

7.2 Following the receipt of revisions and further information, re-consultation letters were sent on the 4th September 2019 to neighbouring properties.

7.3 The following Councillor made representations:

Councillor Maria Gatland [objecting] - Application will have a considerable impact on the local environment, in particular the safety of pupils travelling to and from the school, the school travel plan, engineering measures in and around the school, the impact on the end properties in Melville Avenue and the stress on local roads, and the impact on wildlife.

7.4 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

- There is no need for the school to be located here. The need for the school has not been stress tested and there is a positive bias to massage worst case scenarios. Evidence base for a new school is questionable. Should have been located on the Nursery site next to Conduit Lane.
- The inspector failed to sufficiently justify why the site should be designated as a school.
- Croydon already has an oversupply of schools, and no new ones are needed.
- Given the size of the site, the buildings have been too closely located to neighbouring properties. An alternative layout should be considered with Sport's Hall behind the building and the buildings moved further up the hill. Residents requested this during the applicant's public engagement exercise, but these requests appear to have been ignored.
- The close proximity of the buildings to residents will result in loss of privacy, light, view and noise.
- Impact of the development on light pollution.
- That parents will use Melville Avenue for dropping of children, which will increase parking stress, create noise, and pose a pedestrian safety risk. A control parking zone should be set up to prevent people using the currently free car parking spaces.
- Melville Avenue will become dangerously congested.
- The drawings are inconsistent on what side of the Coombe Road would be widened.
- Concern over the building standard of the school.
- The car park is too large and would encourage car use, which in turn would increase pollution, noise and congestion.
- Car park area is too small.
- School should be reduced in size to reduce impact on environment and local residents.
- Close proximity of bin store/service yard to houses. Impact that this has on noise, smell and increase in vermin.
- Concern over terrorist attack.
- Geology survey is needed to ensure there is no sink holes. Development could cause structural instability to neighbouring properties.
- Concern over flood risk in terms of surface water run-off.
- Vehicles leaving and entering the service yards should only access/leave the site via Coombe Road.
- Air pollution is not being dealt with properly.

- With the extra 652 students due to arrive by Tram it is not clear whether the existing infrastructure can cope with the additional passengers.
- Insufficient cycling provision.
- The 1.8m high timber fence adjacent to the service yard will cause harm to neighbouring living conditions.
- Cars/vans waiting to enter the service yard will cause noise and emission pollution.
- Food waste only collected twice a week, which is not frequent enough.
- Concerns over the impact of open and other event days.
- Car park design does not include drop off, or spaces for large coaches.
- Not enough visitor car parking.
- A number of visually prominent trees will be lost. Their loss will result in increase in noise transmission, increase in air pollution and loss of habitat for fauna on the site.
- Impact of the development on bats, badgers, deer, woodpeckers, owls, common birds and foxes.
- Sport hall is too small, and provides little community offering.
- Public right of way should be maintained.
- Concern about initial 11 week construction phase being through Melville Avenue entrance.
- Impact of development during construction in terms of noise, dust and vibration.
- Noise at the neighbouring properties' boundaries should not exceed 70db during construction, as 75db is only applicable in 'urban areas near main roads in heavy industrial areas'.
- Concern over the haulage routes in phases 2 and 3 of the construction which is routed close to the back gardens of the adjoining houses.
- No environmental impact assessment was submitted.
- Revision do not deal with neighbour's concerns over the proposed location of the school relative to Melville Avenue.
- The one way installed as part of the temporary school should be retained to ensure pupil safe. Stops rat run drivers coming down Melville Avenue.
- Pedestrian gate onto Melville Avenue should be closed and pupils should be forced to use Toucan crossing.
- A car fining system should be introduced on Melville Avenue during pick up/drop off.

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

- Archbishop Tenison should have been invited to build on the site. This school deserves to grow. (OFFICER COMMENT: This is not within the Council's or planning legislation control.)

7.6 The following procedural issues were raised in representations, and are addressed below:

- The site address was incorrect when the temporary application was submitted (OFFICER COMMENT: This relates to the temporary school and letters, site notices and press notices were sent out with the correct address. This in no way impacts on the current permanent school application.).

8.0 RELEVANT PLANNING POLICIES AND GUIDANCE

8.1 In determining any planning application, the Council is required to have regard to the provisions of its Development Plan so far as is material to the application and to any other material considerations and the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The Council's adopted Development Plan consists of the London Plan and the Croydon Local Plan 2018.

8.2 Government guidance is contained in the National Planning Policy Framework (NPPF (2018)), revised in July 2018. The NPPF (2018) 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.

8.3 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.

- 8.4 There is a new draft London Plan that is currently out for public consultation which expires on the 2nd March 2018. The GLA current program is to have the examination in public of the Draft London Plan in Autumn 2018, with the final London Plan 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

8.5 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

8.6 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

8.7 Relevant Supplementary Planning Guidance

SPG Note 12 – Landscape Design

9.0 MATERIAL PLANNING CONSIDERATIONS

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

- a) Principle of Development/Land Use.
- b) Townscape and Visual Impact.
- c) Impact on Heritage Assets.
- d) Impact on Neighbouring Properties Living Conditions.
- e) Impact on Highway, Parking, Transport Network and Pedestrian Safety.
- f) Trees and Biodiversity.
- g) Flooding, Sustainability and Environment.
- h) Health.
- i) Equality.
- j) Other Planning Matters.

Principle of Development/Land Use

Metropolitan Green Belt

9.2 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).

9.3 However, a number of highway works and tree removals are proposed that are located in the Green Belt. These works are not considered to be inappropriate

development as per paragraph 146 of the NPPF (2018). This is because they are considered to fall within the definition of “*local transport infrastructure which can demonstrate a requirement for a Green Belt location*”. There is an identified need for the school as outlined below, and for that school to safeguard pupil safety. The highway works are an essential part of this, and therefore there is a clear need for these highway works within this part of the Green Belt. The works would preserve openness, and do not conflict with the purposes of including land within the Green Belt.

Positive Weight to Schools

- 9.4 Paragraph 94 of the NPPF (2018) states that great weight should be given to the need to create, expand or alter schools, and that Local Planning Authorities should take a proactive, positive and collaborative approach to ensure there is sufficient choice of school places, that will widen choice. 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

- 9.5 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 are 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 forecast to start to occur from 2019/20. The scheme would play a fundamental role in addressing this deficit and represents a significant public benefit.

Sports Pitches

- 9.6 Paragraph 97 of the NPPF (2018) 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.

9.7 Also of relevance is London Plan Policies 3.19 and 7.13 and Croydon Local Plan (2018) policy SP7.3 (d).

9.8 The building of a school would result in a net reduction of playing field area, and it is largely on this basis Sport England have objected. However, in officer's view the loss would be offset through increasing the range of sports that are capable of being played through an improvement in the quality of sport provision and pitches on the site, and by increasing participation in sport and recreation, as well as spreading the associated social and health benefits to the widest range of the local population as reasonable through a community use plan.

9.9 A draft community use plan has been submitted. Whilst the final community use plan would be secured through condition, it is a clear indication of the range of sport and community offering the development would provide, and contains a commitment to fair pricing. The facilities would be made available before and after school, during school holidays and at weekends and on bank holidays. Facilities that are proposed to be made available for community use include:

- Full size 3G floodlit playing surface.
- Grass football pitches.
- Enhanced semi sprung floor sports hall and changing rooms.
- Main Hall Gymnasium.
- Two Activity Studios.
- Hard courts including netball.

Townscape and Visual Impact

9.10 The school is appropriately located at the northern end of the site, with the buildings running parallel to the Coombe Road. This location maximises the benefits of the site by ensuring the building has a strong civic presence to the street, maximises green open space and playing pitch provision behind, and ensuring that the school's entrance is in close proximity to the street and public transport links. At the same time, the most intensely used noise and light generating areas, such as the artificial pitch, are located furthest away from neighbouring properties in Melville Avenue. At the same time good separation distances would be maintained between the proposed buildings and neighbouring properties' boundaries and windows, ensuring the development has a neighbourly relationship.

9.11 The development cleverly responds to the slope of the land, being a very modest three storeys in height at the western end, before decreasing to a two storey height as the land slopes up. The winged form of the building allows the façade to run parallel to Coombe Lane, which helps ensure that building would have a strong civic presence, whilst simultaneously breaking up the massing when viewed from the rear and sides. The variation in sizing of the wings, with smaller wing of the building being closest to properties in Melville Avenue helps alleviate the massing away from residential properties and into the less sensitive larger central areas. The ‘finger’ approach also allows light into the center of the building and would provide views out into the pleasant surroundings of the school for pupils, staff and visitors.



Image 3 – CGI of development in Ariel View

9.12 The volume of the building has been appropriately articulated, which helps to create interest and break it up, whilst also giving the site legibility. The metal standing seam projecting corner and picture box projecting windows are central to giving the school a strong contemporary identity. The metal standing seam is used to highlight the extra special parts of the school like the performance hall, sports hall, main entrances and art rooms. The sports hall entrance is articulated with a double height splay giving it a pronounced and legible entrance.

9.13 Glass curtain walling would help to create views through the building, maximising light into the central circulation areas and views out into the landscaped courtyard areas. Grey brick features strongly on the main façade, giving robustness to the design whilst also helping to create an appropriate contextual modern appearance. Render is proposed on the non-street facing courtyard elevations,

a material choice that was questioned by the PRP, committee members and officers at pre application stage. Whilst this view is still held by officers, it is accepted that this material is only located on the less visible parts, and the use of this material does not fundamentally erode the overall quality of the design.



Image 4 – CGI of the scheme

9.14 The development is accompanied by a high quality landscaping scheme that includes extensive tree planting. The landscape design features many points of interest, such as the amphitheatre and courtyard terraces, that help to create fun and engaging environment for pupils. The landscaping has also been designed to naturally restrict use of certain more sensitive parts of the site to the benefit of the environment and neighbouring properties living conditions.



Image 5 – Proposed Landscaping Plan



Image 6 – CGI of Internal Courtyards/Amphitheatre

9.15 The development has a clear and rational layout of uses with various departments located within the wings of the building. The development has been designed with the community use in mind, with publically accessible areas being able to be secured separately from the rest of the school. The school has been designed to be a fully inclusive and accessible building throughout.



Image 7 - Proposed First Floor Plan for Teaching Block

9.16 The applicant has been in discussions with the Metropolitan Police to ensure that the building is safe and secure, and opment would achieve secure by design accreditation. This is recommended to be secured via condition.

Impact on Heritage Assets

9.17 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.

9.18 The NPPF (2018) requires a great weight to be placed on the protection of heritage assets. A pragmatic approach is advocated at national level by the NPPF (2018), between balancing the need and benefits of development and the protection of heritage assets.

9.19 The applicant has submitted a 'Historic Environment Desk Based Assessment' which considers all of the surrounding heritage assets, including archaeological remains, and assesses the direct and indirect impact on them and their setting.

9.20 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 locally listed. The site itself appears from historic mapping to have formed agricultural land, likely associated with the Coombe Lodge Estate.

9.21 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 school would erode some of the open, 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. The proposal has been designed to allow a substantial proportion of open space to be retained; elements such as boundary treatments and landscaping have also be designed to further enhance the green and open character. The proposal would have some harm, but less than substantial harm, on the setting of the designated and locally designated heritage assets.

9.22 Paragraph 196 of the NPPF (2018) 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 (2018) 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.'

9.23 The proposed development provides substantial public benefits, which 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 statutory requirements set out in Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990.

9.24 The site is located within an Archaeological Priority Zone. GLAAS have reviewed the submission and require no further archaeological work or conditions.

Impact on Neighbouring Properties Living Conditions

Light and Outlook

9.25 The proposed development would not have a significant impact on neighbouring properties' living conditions in terms of daylight and sunlight. The closest neighbouring property, both in terms of windows and boundary proximity, to the school building is no.22 Melville Avenue. This property's boundary is 22m away from the flank wall of the proposed school, with the windows to this property estimated as being a further 12m away (34m in total). The generous separation distances combined with the modest three storey height would be sufficient to prevent the development from having a significant impact on the sunlight and daylight of this property, or its garden area. Given these separation distances the development would comply with BRE daylight and sunlight standards.

9.26 The proposed development would not cause, in planning terms, an unacceptable loss of outlook, or increase in sense of enclosure, due to aforementioned separation distances. There would be an impact on their view, but there is no right to a view within planning legislation. The applicant has sought to mitigate the impact with a proposed hedgerow and multi-layered woodland style planting, as well as three new trees, to help further strengthen existing planting in this location.

Privacy

9.27 A 18m to 21m minimum separation distance between directly facing habitable room windows is a useful yardstick for protecting neighbouring properties' privacy. The proposed separation distance at 34m and over, is well in excess of this commonly accepted standard, and indicates that windows within the development would not cause unacceptable loss of privacy.

9.28 Intensification of the use has potential to increase frequency that overlooking from the playing fields would occur into neighbouring properties. The applicant has taken appropriate steps to manage and mitigate this. The most intensely

used parts, i.e. playground, amphitheatre seating areas, sports hall and main pitches, car park areas as well as the school and main hall entrance, are all located a significant distance away from residential properties that surround the edge of the site. Planting would be used to deter pupils or members of public walking up to properties rear boundaries.

Noise Disturbance

- 9.29 The main sources of noise are presently caused from traffic movements along Coombe Road and from use of the sport fields. The intensification of use of the site has the potential, if not appropriately managed and mitigated, to cause harm to the living conditions of neighbouring properties.
- 9.30 The proposed school classes would start at 8:40am, with the breakfast club and before school study/coaching proposed to start at 7:30am. It is hoped that 50% of pupils would be on site before 8am. At the end of the day one third of the pupils would be expected to depart at final curriculum lesson at 15:10, a further third at 16:00 at the conclusion of extracurricular target study groups, with the final third departing at 17:00 following conclusion of extracurricular sports coaching. The majority of the activity associated with the school would be during the less sensitive weekday hours, and as such would not cause unacceptable harm to neighbouring properties' living conditions. The main noise generating activities i.e. play areas, sports hall and main pitches and main car park area are located significant distance away from neighbouring properties, helping to further mitigate their impact. Conditions are recommended to prevent amplified music and speech from causing nuisance to neighbouring properties
- 9.31 In regards to the community use hours, it is necessary to maximise the potential of the site to offset the loss of playing field area, but in a way that would not unduly impact neighbouring amenity. The design and location of the buildings helps in part to ensure this. The main noise generating sport uses are located a significant distance away from residential properties, particularly those in Melville Avenue. The entrance to the school and sports facilities is on Coombe Road, where the background noise from vehicle movements would naturally mask any comings and goings. There is sufficient car parking on-site that would prevent the need to use quieter residential roads such as Melville Avenue, which would help to contain any noise. Activities that take place internally would not cause disturbance to neighbouring properties due to modern building standards.
- 9.32 There is a concern that use of the external areas, including artificial pitches, at more sensitive early morning/late night hours, both during the week and weekend, when background noise is lower, could unduly impact neighbouring properties' living conditions. As such the following hours of operation are to be secured via condition.

Use of Internal Facilities

6:30 am to 10pm Monday to Friday

8am to 8pm Saturday/Sunday and Public Holidays

Use of External Area & Facilities Including Artificial Pitches

8am to 9pm Monday to Friday

9am to 8pm Saturday/Sunday and Public Holidays

9.33 The submitted delivery and servicing plan outlines that the majority of the deliveries would be during the day, with the exception of the food delivery which is at 7am. The timing of this delivery, given the nature of the use, is considered to be reasonable.

9.34 Conditions are recommended to ensure that any plant and machinery would not adversely impact neighbouring residential properties in terms of noise, vibrations and odours.

Light Pollution

9.35 The proposed lighting scheme indicates there would be some low level lightspill (up to 3 lux) into neighbouring properties gardens. The applicant has confirmed that the floodlight serving the football pitch and lighting from the service yard, which are the main sources of this lightspill, would not be turned on outside of school/community use hours, so would not unduly harm the living conditions of neighbouring properties. A condition to secure this as well as to ensure the development operates in accordance with best practice guidance is recommended.

Impact on Highway, Parking, Transport Network and Pedestrian Safety.

Location /Catchment

9.36 The applicant has estimated the likely catchment area of the school by basing it on the postcode data for families that have expressed an interest in sending their children to this school, along with the location of two feeder schools (Park Hill Junior School and St Peter's Primary School). It is estimated that 85% of families that would attend the school would live within postcode areas CR0 and CR2. The proposed school is well sited to maximise on the potential of this catchment area, as it is on the boundary and centre of these two postcode areas. This ensures that a significant percentage of pupils would be within walking and cycling distance. The site benefits from being close to the tram and bus routes which stop on Croham Road. Despite the site's poor PTAL rating, the location of the school in terms of likely catchment area relative to public transport is good.

Trip Generation

9.37 The applicant has estimated the likely level of trips based on pupil/staff numbers by using data from the two feeder schools, as well as four Croydon secondary schools. Quest Academy is considered the most appropriate comparison, having similar accessibility conditions, onsite parking for staff/visitors, as well as providing leisure facilities to the local community.

Mode	Baseline Pupil Mode Share	Target Pupil Mode Share	Target Pupil Trip Generation
<i>Walk</i>	15.8%	17.8%	299
<i>Cycle</i>	0.2%	2%	34
<i>Car (inc Car Share)</i>	11.8%	8%	134
<i>Bus</i>	31.61%	31.61%	531
<i>Tram</i>	38.79%	38.79%	652
<i>Train</i>	1.8%	1.8%	39
<i>Total</i>	100%	100%	1680

9.38 In terms of staff, the level of trips has been forecasted through the use of 2011 Ward Census data. The modal split for staff is predicted to be as follows:

Mode	Baseline Staff Mode Share	Target Staff Mode Share	Staff Trip Generation Base/Target
<i>Car Driver</i>	61.9%	51.9%	80/67
<i>Car Share</i>	4.4%	6.4%	6/8
<i>Taxi</i>	0.5%	0.5%	1/1
<i>Motorcycle</i>	1.1%	1.1%	1/1
<i>Rail</i>	7.1%	7.1%	9/9
<i>Tram/Underground</i>	2.4%	5.4%	3/7
<i>Public Bus</i>	12%	15%	16/20
<i>Cycle</i>	1.2%	3.2%	2/4
<i>Walking</i>	8.7%	8.7%	11/11
<i>Other</i>	0.74%	0.74%	1/1
<i>Total</i>	100.04%	100.04%	130

(% greater than 100% due to nature of raw census data)

9.39 In terms of the community hub and sports facilities, the mode share has been predicted by using comparable sporting and leisure sites from the TRICS database. The predicted modal split is predicted to be as follows:

Mode	Baseline Community Use Mode Share
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<i>Car</i>	51.8%
<i>Bus/Tram</i>	2.9%
<i>Coach</i>	11.7%
<i>Rail</i>	0.9%
<i>Walking</i>	28.9%
<i>Cycling</i>	3.8%
<i>Total</i>	100.%

9.40 The applicant is targeting a 10% reduction in car use from the baseline modal split for the community hub and sports facility by promoting public transport, walking and cycling. The applicant has estimated the level of trip generation that would be expected to occur within the TA, although the exact trip generation is likely to vary once the community use plan has been finalised. A maximum 260 people could attend a community use activity program during the week, and up to 300 during the weekend. Based on target mode share, up to 109 would travel to the site by car during the week, and 125 at weekend. It is worth noting that this is likely to be the maximum number.

Parking Space Justification

9.41 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. A balance needs to be struck between ensuring there is sufficient parking space provision to not amplify parking stress on surrounding roads, and not providing too much car parking so failing to promote sustainable modes of transport.

9.42 The car park would contain 96 car parking bays, 6 of which are designed for disabled drivers. Based on census data, it is expected that 80 car parking spaces would be required for school staff parking and 8 for staff for the community use. Under the target modal shift it is envisaged that this would fall to 67 parking spaces for school staff and 7 for staff in connection with the community use.

9.43 People using the community use would also require on-site parking. Up to 85 cars are expected to be parked during the week at any one time, and up to 115 cars at weekend. The target modal shift is envisaged to reduce this to 68 cars during the week and 94 at weekend. It is worth noting that there would also be times when the operation of the community use would overlap with when staff would be parked and parking is also required for special events. The intended occupier for example has hopes of using the site for school championships. These type of events would be expected to require between 50 to 100 car parking spaces depending on the event. These events are hoped to take place up to eight times a year. The 96 car parking spaces provided by the development based on the above expected demand and targets that seek to reduce car use,

is considered to be appropriate. Some phasing of the car parking is proposed through the use of cones to help ensure that sustainable travel patterns are established at an early stage.

9.44 6 disabled parking spaces would be provided whose use would be monitored through the proposed Car Parking Management Plan (CPMP). In the event that additional disabled bays are required then standard bays would be converted. The level of disabled bay provision is considered acceptable.

9.45 20% of the electric vehicle charging points would be active, with 20% passive in line with the current London Plan (2016). Whilst it is noted that the draft London Plan requires 20% active, 80% passive, given this is in the early stages of adoption it would be unreasonable to require this.

Pick Up and Drop Off Facilities

9.46 A lay-by for set down and pick up by car, mini bus and coach is proposed. This would have the capacity for up to 8 cars, 7 mini buses or 2 coaches. It is estimated that 284 vehicles would use this facility a day, with the Travel Plan aiming to reduce this to 192 vehicles.

9.47 The pick-up/drop off facility would be permitted to ensure that only those with a real justifiable need could use it. These include those with mobility impairments, special need or pupils that live a significant distance away, or without reasonable access to non-car modes. Priority would also be given to those who car share. A CPMP has been submitted, which is to be secured by condition to ensure on site car parking facilities including pick up and drop off are appropriately managed. The CPMP also includes details on how special events would be appropriately managed.

9.48 The development provides sufficient onsite parking facilities such that the scheme would not have a significant impact on surrounding residential streets parking stress. Many of objectors have commented that a fining system should be implemented to prevent parents picking up/dropping off pupils on surrounding roads. However, such a system is not considered feasible in this instance given the nature of the roads.

Tram Network Impact

9.49 The application has been reviewed by TfL who are satisfied that sufficient measures have been proposed to mitigate the impact of the development on the tram's network capacity. Breakfast clubs and before school coaching would help to ensure that up to 50% of pupils arrive at the school before 8am, reducing the impact of the development during peak hours. The majority of pupils would also have departed at the end of the day before the evening peak/rush hour occurs.

9.50 TfL raised concerns that pupils may attempt to use an existing temporary/emergency vehicle access point that was designed for ad-hoc vehicle, located opposite the Melville Avenue/Coombe Road junction. TfL request that further mitigation measures be installed to either deter people from crossing the tram line at this point, or to provide a more formal crossing point. The applicant has agreed to fund these measures, to be secured through the legal agreement.

Cycling

9.51 226 cycle parking would be provided for pupils and staff, and 17 spaces for visitors. The cycle storage would be provided on a phased basis, starting with 98 cycle secure storage facilities; with the remaining 145 storage spaces provided prior to full occupation. The proposed level of cycle provision complies with the London Plan (2016) and is to be secured via condition. The cycle parking would be located adjacent to the shared pedestrian and cycle path on the natural pedestrian/cycle desire line, ensuring it would be convenient to access.

9.52 The submitted cycle environment review system (CERS) concluded that conditions for cyclists in the area were mixed. There are limited cycle facilities on the approach roads, which in conjunction with the traffic conditions on Coombe Road, would be expected to deter cyclists. Elsewhere there are routes that provide good conditions for cyclists yet there is poor connectivity to those routes.

9.53 A Toucan crossing point is proposed to provide easy access into the site for cyclist. A number of other options were explored including the provision of designated cycle paths, but were not deemed feasible due to width of surrounding roads, concern over tree roots and cycle infrastructure limitations. The applicant has agreed to fund a feasibility study that would look into whether the site could be connected to the proposed cycle route scheduled to be built in Lloyd Park.

9.54 The sports hall would incorporate shower and changing facilities which could be used by members of staff wishing to cycle to work. The applicant has confirmed that they would install signage within the site to ensure that such facilities are appropriately promoted and easy to find.

Sustainable Transport Promotion Measures

9.55 The applicant proposes the following measures to reduce car use:

- i) School entrance criteria will favour pupils living within 1.6km of the site and who have siblings that attend the school (increased opportunity for car share).
- ii) The sports ethos of the school supports the use of active travel modes including walking and cycling.

- iii) Active management of the pedestrian environment near the school is planned by staff members in the interests of ensuring that pupils walking to/ from the school, the Lloyd Park tram stop bus stops and generally on the pedestrian approaches are safe and good pupil behaviour is maintained.
- iv) The applicant has agreed to fund the expansion of bus stop waiting facilities at the westbound bus stop on Croham Road from two to three bays. This is to be secured through the legal agreement.

Travel Plan

9.56 The draft Travel Plan includes information regarding school events, competitions and community use, outlines a potential for a school bus, as well as measures to encourage sustainable travel. The Travel Plan seeks to achieve gold accreditation by the start of 2021, outlining a number of measures to promote and incentivise sustainable travel in order to achieve the target modal splits identified. A finalised Travel Plan, along with monitoring is recommended to be secured via legal agreement.

Proposed Junction and Highway Capacity Impact

9.57 A number of options were considered by the applicant. Initially a fully signalised junction was proposed. However, TfL had strong objections to this on grounds of traffic queue length that were modelled to be approximately 412m on Coombe Road during the morning peak, and increased risk of further delays associated with modelling uncertainty. This option was therefore excluded and the scheme revised.

9.58 A single standalone Toucan crossing facility is now proposed on Coombe Road. A modelling exercise has been carried out by the applicant that considers how the junction will perform in 2027 once the school is fully occupied. The proposed Toucan crossing is predicted to reduce queueing and delays compared to the existing layout, even if the school was not built. The junction would operate at below capacity except for the AM Peak, whereas a fully signalised junction (as initially proposed), would exceed capacity during all three modelled periods, including Inter Peak and PM Peak. The maximum modelled queue length would be approximately 140m which is predicted to occur during the morning peak going into Croydon on Coombe Road. Officers are satisfied that the proposed Toucan Crossing is the most appropriate solution. The applicant has also agreed to install the ducting for a fully signalised junction, so the junction is future proofed. The proposed highway works will need to go through further public consultation as part of any TRO and necessary safety audits, and as such the design will continue to evolve as part of that process. The highway works would be secured as part of the legal agreement.

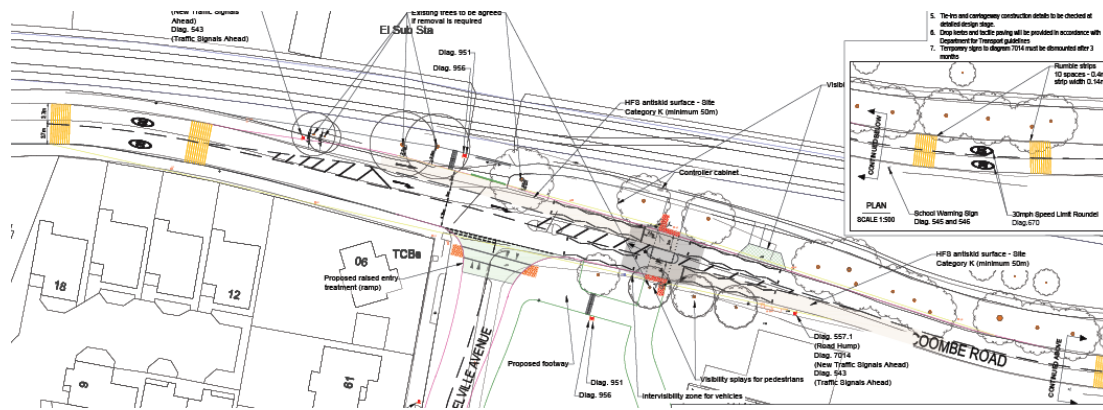


Image 8 – Preliminary Proposed Highway Works

9.59 The school timetable has also been designed to avoid clashing with the start and finish times of other schools in the surrounding area. Old Palace on Melville Avenue school day starts at 8:25am, whereas the proposed school is to open at 8:40am. This will lessen the impact on the road network.

Pedestrian Safety and Environment

9.60 A PERS audit identified that all pedestrian links achieved average, good or very good scores. The development would increase pedestrian volume particularly along Coombe Road. The proposed Toucan crossing would ensure that pupils can safely cross. The entrance of the site has been designed with pupil safety in mind, with the pedestrian and cycle access point located away from Melville Avenue, directly in front of the proposed Toucan crossing to create a coherent pedestrian desire line. This would help ensure that pupils use the formal Toucan crossing, rather than trying to cross this busy road in other uncontrolled locations. In addition, both the service entrance and general vehicle entrance have been located away from the pedestrian/cycle entrance, preventing potential conflicts between vehicles and pupils.

9.61 Pupils would be able to safely cross Melville Avenue with a new raised platform added at this junction that would enhance driver awareness and slow car speeds. The operation of the Toucan crossing would naturally interrupt traffic flow allowing cars to exit, but also provide opportunities for pupils to cross.

9.62 A number of other safety measures are proposed as part of the highway works including rumble and tactile paving, mobile/permanent speed indicator signs, increased signage and improved road markings. A number of other good practice 'soft' measures, in particular road safety education, training and publicity activities for children (for example something similar to junior road safety officer scheme) are proposed.

9.63 Preliminary Stage One and Two Safety Audits have been carried out for the proposed highway alterations. Final Stage One and Two Audits would be carried

out prior to commencement to ensure that the finalised highway works are safe. Stage Three (Completion of Construction) and Stage Four safety audits (monitoring) would also be carried out at the appropriate stage. These are recommended to be secured through the legal agreement.

Construction Logistics and Delivery Service Plan.

- 9.64 The applicant has submitted an indicative draft Construction Logistic Plan (CLP) and Delivery Servicing Plans (DSP). The submitted CLP complies with TfL's guidance, and would strive to achieve Fleet Operator Recognition Scheme gold status. This would help to ensure best practice in regards to safety, efficiency and environmental protection. The finalised CLP and DSP are to be secured by condition to ensure that the impact of construction on neighbouring properties, parking and on the highway is appropriately mitigated.

Refuse

- 9.65 The DSP outlines waste collection arrangements, which is to be secured via condition. Waste would be stored in the delivery and servicing area, accessed from Melville Avenue, with waste lorries driving into the site for collection. The refuse area is of sufficient size and design to cope with the waste and recycling demands. The waste would be collected by a private waste collector.

Trees, and Biodiversity.

Trees

- 9.66 As part of the currently proposed highway works 5 trees on the north side of Coombe Road, which are located within the Green Belt, and 1 tree on the south side would need to be removed. There is also a small risk that other trees may need to be removed as part of Highway safety audit process. The highway works are absolutely necessary to ensure that pupils are able to cross Melville Avenue/Coombe Road safely and ensure the Melville Avenue/Coombe Road junction is safe. Officers have worked to reduce the impact of the highway works, resulting in the lowest number of trees being lost as possible, without compromising safety. Whilst the loss of the trees is regrettable, given the importance of delivering a school to address the deficit in secondary places, this loss is deemed acceptable and necessary. CAVAT values, which is a valuation method to express the amenity value of the trees in terms of cost of an equivalent value, have been calculated for the trees. A financial contribution in line with this CAVAT valuation is recommended to be secured via the legal agreement to secure replacement trees that would mitigate those lost.
- 9.67 A number of other trees within the site (T9, T12, T13, T17, T28, G29 and T31) are to be removed. These are either of poor quality or are required to be removed in order to facilitate the development. The loss of these trees, and their impact on visual amenity is recommended to be appropriately mitigated through a

Contamination

- 9.71 Intrusive ground investigation were undertaken. No asbestos or contaminants were found and no sinkholes were discovered. Gas monitoring was undertaken, and the results were sufficient to demonstrate that no further gas monitoring is required. The submitted reports are sufficient to demonstrate that there are no significant land contamination risks. A condition is recommended to ensure sufficient measures are in place should unexpected contamination be found.
- 9.72 The Environmental Agency have recommended conditions to ensure that groundwater is sufficiently protected.

Sustainability and Energy

- 9.73 A number of measures are proposed to reduce energy demand, with air permeability and heat loss parameters exceeding those required by building regulations. The demand for cooling would be minimised by maximising natural ventilation on site and through mechanical ventilation heat recovery units. These measures are predicted to achieve a reduction of 18 tonnes per annum (9%) in regulated CO₂ emission over 2013 Building Regulations.
- 9.74 The applicant is proposing to install heat pumps and photovoltaic panels. These measures are predicted to achieve a 54 tonnes per annum (27%) reduction in regulated CO₂ emissions. In combination with the measures outlined above, the development would achieve the 35% target beyond 2013 Building Regulations. In the event of the development falling short of expected performance, a carbon offset payment is recommended to be secured through the legal agreement.
- 9.75 The development aims to achieve BREEAM Excellent standard. This is recommended to be secured via condition. The impact of the development in terms of sustainability, energy and carbon dioxide emissions is acceptable.

Air Quality

- 9.76 The site, as is the whole of the borough, is an Air Quality Management Area and is therefore located in an area identified as experiencing elevated pollutant levels. The operation and construction of the development has the potential to worsen this and has potential to expose future users to elevated pollution levels.
- 9.77 The site is identified as having high sensitivity to potential dust impacts, but the risk to human health is low. A number of mitigation measures are proposed in line with GLA's guidance, which would help to ensure that the residual effect from all the dust generating activities such as demolition, construction and earthworks would not be significant. A demolition method statement is recommended to be secured via condition.

- 9.78 Additional vehicle movements would lead to the generation of exhaust emissions. Dispersion modelling assessment have been undertaken that demonstrates the site is suitable for the intended use. The development is also modelled to have a negligible impact on neighbouring properties and other receptors.
- 9.79 Due to road vehicle exhaust emissions the development would not strictly be Air Quality Neutral. Mitigation measures are proposed to address this during construction and operation, for example electric vehicle charging points, improvements to cycling and walking infrastructure and a Travel Plan that includes a No Idling Engine Strategy. In addition, conditions are recommended requiring the installation of green infrastructure along boundary of Coombe Road and in regards to boiler emissions. A £21,100 air quality contribution to help mitigate the impact of the development is recommended to be secured through the legal agreement.

Health

- 9.80 The development is considered to comply with policy DM16 of the Croydon Local Plan (2018). The proposed school with its sports focus would actively promote health and well-being, and the community use plan would ensure that a wide range of people would have access to sport facilities. Measures such as the Travel Plan are proposed to ensure that active travel is promoted. The design has ensured that there are many parts of the site that would naturally encourage social interaction and play. Sufficient measures are proposed to ensure the development does not have an unacceptable impact in terms of emissions or air quality.

Equality

- 9.81 The school would be a 'Free School' which are 'all-ability' schools that cannot use academic selection processes. It would not be 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. Measures have been taken in the building's design to ensure it is accessible for all. The community use plan seeks to encourage sport involvement amongst the widest cross section of the population as reasonably possible.
- 9.82 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.

9.83 The proposed development is not considered to unduly discriminate on behalf of age, disability, gender, relationship, pregnancy, race, religion, sex and sexual orientation. The development in general is considered to benefit all.

10.0 Conclusion

10.1 Grant Planning Permission Subject to Conditions and Legal Agreement.