

1.0 SUMMARY OF APPLICATION DETAILS

Ref:	17/05830/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 September 2019 for 180 pupils, with associated erection of a temporary two storey school building, car parking, cycle stands, bin stores, fencing, soft and hard landscaping.
Drawing Nos:	FS0425-Coombewood-Temp-A-001 P1, 100 P1, 205 P2, 505 P1, 506 P1 and 520 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 committee because the Ward Councillor (Cllr Maria Gatland) made representations in accordance with the Committee Considerations Criteria and requested committee consideration and objections above the threshold in the Committee Consideration Criteria have been received.

2.0 RECOMMENDATION

2.1 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.

b) Street Tree Removal and Replacement.

c) Travel Plan.

d) Any other planning obligation(s) considered necessary by the Director of Planning and Strategic Transport.

2.2 That the Director of Planning is delegated authority to negotiate the legal agreement indicated above.

2.3 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) In accordance with the approved drawings.
- 2) Submission of a Construction Method Statement/ Construction Logistics Plan prior to commencement.
- 3) Highways Works and any associated details to be agreed with LBC prior to commencement, and completed prior to occupation.
- 4) Development to be built/operate in accordance with SuDS Statement.
- 5) Tree Method Statement.
- 6) Landscaping Plan including replacement trees.
- 7) Land contamination.
- 8) No food shall be cooked on the premises, other than the warming or heating up of pre-prepared food.
- 9) No musical instrument or sound amplification equipment shall be used outside of the building.
- 10) Compliance with Ecological Assessment and Bat Mitigation and Enhancement Plan.
- 11) Details of school opening hours, and restricting out of school hours use of the site to between 7am and 10:30pm.
- 12) Details of any mechanical ventilation.
- 13) Condition controlling noise from plant/machinery/extract system.
- 14) Temporary Buildings to be removed by September 2019, and playing fields reinstated within three months. (Required by Sport England).
- 15) Community Use Agreement prior to commencement of use. (Required by Sport England).
- 16) Continuation of sports use for existing playing fields and replacement facilities during construction. (Required by Sport England).
- 17) Installation of 2m high chain fence. (Required by Sport England)
- 18) Additional access gate to Sports Pitches. (Required by Sport England)
- 19) Changing room layout including showers. (Required by Sport England).
- 20) Development to accord with Secure by Design principles.
- 21) Control of Light Pollution and Nuisance.
- 22) School Travel Management Plan to be submitted and approved in writing.
- 23) Travel Plan to include 'no idling engines strategy'.
- 24) Further details in regards to servicing arrangements, vehicle swept path analysis and cycle parking.
- 25) 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

2.4 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.

- 2.5 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.
- 2.6 That, if by 8th May 2018 the legal agreement has not been completed, the Director of Planning is delegated authority to refuse planning permission.

3.0 PROPOSAL AND LOCATION DETAILS

Proposal

- 3.1 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, fencing, bin stores, soft and hard landscaping.

Site and Surroundings

- 3.2 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 across the site, with the land rising to the south and east
- 3.3 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.
- 3.4 The site is currently designated as Green Belt, although under the latest modified version of Emerging Local Plan, due to be adopted late February, the site is proposed to be de-designated from the Green Belt. The Emerging Local Plan designation of the site states the following 'secondary school with retention of playing pitches.'
- 3.5 The site is located within Archaeological Priority Zone.
- 3.6 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.
- 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 Combe House (St Margaret's School) (Grade II) and Coombe House (St Margaret's School) (Grade II).
- 3.8 The site is adjacent to the following locally listed historic park and gardens: Geoffrey Harris House/Coombe House, Lloyd Park and Royal Russell School.

- 3.9 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.
- 3.10 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 for the site, 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.
- 3.11 The southernmost part of the site is located in a Site of Nature Conservation Importance.

Relevant Planning History

- 3.12 No relevant planning history for this site and proposal.

4.1 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- There are 'very special circumstances' that clearly outweigh the significant harm that would be caused to the Green Belt by the development, and any other harm identified within the officer's report. In addition, the Emerging Local Plan de-designates the site from the Green Belt.
- The use of this land for education is appropriate given the urgent need for secondary school places in the London Borough of Croydon. Emerging Local Plan CLP2 designates the site as 'secondary school with retention of playing pitches'. This represents a significant public benefit of the scheme.
- The proposed development subject to conditions would result in small loss of playing field area, but this would be offset by the positive impact that the development has on sports provision in the borough.
- 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 proposed development would not have a demonstrable impact on neighbouring properties' light, outlook or privacy. The impact of the development in terms of noise disturbance can be mitigated via condition.
- The proposed development would be subject to legal agreement and conditions, so would not cause demonstrable harm to the transport network, highway and parking. Public safety including 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. Any impact of the development on other trees is mitigated by condition. The proposed development would safeguard protected flora and fauna.
- In light of the temporary nature of the development, the impact of the development in terms of sustainability, energy and carbon dioxide emissions is acceptable. In regards to air quality and land contamination, subject to conditions, the development makes appropriate mitigation measures.

- The proposed development is not considered to discriminate on behalf of age, disability, gender, relationship, pregnancy, race, religion, sex and sexual orientation. Measures have been taken in the building's design to ensure it is accessible for all.

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)

Stage one consultation request was sent on the 30th November 2017, and therefore the six week consultation period expired on the 12th January 2018. Despite this, the GLA has verbally confirmed that they will issue a written response to the consultation request on the 5th February 2018. The contents of this response will be included within a follow up addendum prior to the committee meeting.

Transport for London (Statutory Consultee)

TfL have confirmed that they have no objection to the proposed development. They have confirmed that the site is not located near Transport for London Road Network (TLRN) or strategic road network. They have confirmed that the trip generation analysis shows there is unlikely to be a significant level of peak time tram trips for staff and pupil, and are satisfied that the increased use of the access road to Lloyd Park car park would not have an adverse impact on the tram network. They have recommended that the travel plan be secured, monitored and reviewed as part of the S106.

(Officer's Response: Officer's agree with TfL assessment of the case. A Travel Plan is recommended to be secured through the S106 agreement and via condition).

Sport England (Statutory Consultee)

Sports England raise no objection to the application, and consider that the development meets exception 3 of their adopted Playing Fields Policy. In summary they state:

- The site is actively used both formally and informally for sport, but accept that the site ancillary facilities are in poor condition.
- Adopt a flexible approach to the siting of temporary buildings on playing fields provided that they do not have a negative impact on the ability for the playing field to function. They note the impact of the development on the playing fields, but consider that this impact can be overcome as long as changing rooms can be provided within the temporary school building.

- Consider the impact to be acceptable given the temporary nature of the development. The school buildings will not result in the long term and permanent loss of playing field, that the temporary buildings would not impact upon existing pitches or sports markings, and that there would be sufficient playing field for pitches to be marked out.

Sports England require the following conditions to be placed on the application.

- School buildings to be removed at the end of temporary period and playing field to be reinstated.
- Community Use Agreement.
- Replacement facilities during construction.
- Temporary protective fencing to be erected.
- Gate in fencing.
- Further details on changing room layout

(Officer's Response: we agree that the impact of the development on playing fields is acceptable. The condition required by Sports England are recommended to be attached to the planning permission (conditions 14 to 19))

Lead Local Flood Authority (Statutory Consultee)

The LLFA have no comment on this application.

(Officer's Response – The impact of the development on flooding has been considered by officers in the main body of the report. Officers are satisfied that the development subject to conditions would not have an adverse impact on flooding)

Historic England - Greater London Archaeological Advisory Service (GLAAS)

GLAAS have confirmed that that there is no discernible on-going archaeological interest at this site. They have raised no objections and do not consider further assessment or conditions to be necessary.

(Officer's Response – This report is in agreement with GLAAS assessment of the site. No further assessment or conditions are necessary)

Natural England

Natural England have confirmed they have no comment on this application.

Environmental Agency

Environmental Agency have confirmed they have no comment on this application.

Metropolitan Police

That the development should be conditioned so that it is required to follow the principles and physical security requirements of secure by design.

(Officer's Response: Condition 20 is recommended to secure this.)

6.0 LOCAL REPRESENTATION

6.1 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 three 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: 257 Objecting: 32 Supporting: 220 Commenting: 5

6.2 The following local groups/societies made representations:

- Croham Valley Residents' Association (objection)

The following Councillor made representations:

- Councillor Maria Gatland (objecting) – Concern over the traffic problems that the development will cause and that this application has come forward prior to the adoption of the Emerging Local Plan. Also has concerns regarding flooding.

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

- Concern that the access/pick up/drop off arrangements not being appropriate.
- Large number of people will drive to the site due to the poor PTAL rating of the site.
- Making Melville Avenue one way will have an adverse impact on access.
- The temporary building and fencing is not of visual merit.
- Concern over pupil safety accessing the school and effectiveness of proposed road crossings.
- Development would create traffic jams and parking stress.
- There is no need for a secondary school due to sufficient provision of existing schools in the area.
- The development will increase noise disturbance in the local area.
- Council could have looked at alternative sites rather than destroying the green belt. The school should be built on brownfield sites that have better public transport links.
- The development is a flood risk.

- The development will destroy precious trees and meadow. The proposal would be harmful to the environment.
- Green spaces are precious and once changed will be lost forever.
- Existing tram and bus infrastructure is already crowded and this development would make the situation worse.
- The development would prevent the nearby secondary school Archbishop Tenison's from using the playing fields. They need to use the playing fields as this school has no playing fields for itself.
- Archbishop Tenison's site should have been expanded instead of this development.
- A temporary building is not economic and is a waste of tax payers money.
- It is not appropriate to determine an application for a temporary school, when the permanent school has not been approved.
- This development will prevent other schools not having funding.
- The development will make it difficult for vulnerable children from Rutherford School to access their school.
- Any development on the site will have a detrimental impact on the environment. Increased traffic will bring noise, air and light pollution. At night, the site is used by local wildlife resident on the adjacent SNCI including bats, owls, deer, pheasants, badgers as well other more common wildlife.
- The rush to determine this application will ensure that mistakes are made.
- The transport assessment carried out by the applicant is poor. The trip generation data is incorrect and misleading.
- That an Environmental Impact Assessment should be done.
- The council have not justified very special circumstances to allow for development on the green belt.
- The junction of Coombe Road between Melville Avenue along Coombe Lane to Gravel Hill is the most dangerous road in Croydon with 4 fatal crashes in the last 4 years and yet no mention of this fact has been made in this Planning Application.
- Concern over construction vehicles entering from Melville Avenue.
- Melville Avenue entrance should not be used.
- Concern about the lack of parking for staff on-site.
- Impact of Lloyd and Coombe Park which are designated as locally listed historic parks and gardens and site of nature conservation importance.
- A new access road and crossing for pedestrians should be built off Coombe Road adjacent to the existing buildings. This should be controlled by traffic lights which would slow the traffic in Coombe Road and go some way to avoiding accidents like the one on the weekend of 16th December at this very junction.
- There is insufficient visibility at Coombe Road/Melville Avenue Junction.

Support

- Not enough schools in Croydon and this development is much needed and will provide significant benefits to children.
- That the proposed development would serve local community better than unused fields, and is an excellent use of the site

- The development does not seem intrusive as most of the green space will not be developed on.
- The school is sympathetic to the local environment.
- The development by providing a local school will reduce pupils travel time.
- It is safer to send a child to a local school rather than forcing them to travel to distant schools.
- The development will create additional jobs.
- Support the fact that this is a Free School. Good state Schools without selection criteria are required for social mobility.
- The size of the site will prevent it having an adverse impact on the local community.
- The site is ideal location due to the close proximity of the tram stop.
- The school will provide top quality sporting activities which is lacking in Croydon at present.
- The development promotes sustainable travel.
- This secondary school will be of direct benefit to the children of St Peter's (and to those from Park Hill Junior School) as children that attend this school are promised places at the school.
- This development would have more benefit to local people than luxury flats.

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

- Planning permission should be refused as a permanent school would be harmful. (OFFICER COMMENT: Planning legislation requires development's to be determined on their own merits. Whilst it is acknowledged that the development would increase the likelihood of a permanent school being built on this site, it would not be appropriate to refuse this planning application on the basis that a potential hypothetical scheme for a permanent school could be harmful)
- Queries in regards to covenants (OFFICER COMMENT: This is not a valid planning consideration and a separate legal matter).

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

- A 'support' letter from a Mr Scoobie Doo which states "This is a test of the integrity of the comments system!" (OFFICER COMMENT: This is not considered to be a valid support letter)
- That the site address was incorrect when the application submitted. (OFFICER COMMENT: The site address was incorrect when the application was validated. However, this was spotted, and letters, site notices and press notices were sent out with the correct address.)
- That no site notices or press notices have been displayed. (OFFICER COMMENT: This was received prior to site notice being erected and press notices being published).

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 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 Consolidated London Plan 2016, the Croydon Local Plan: Strategic Policies 2013 (CLP1), the Croydon Replacement Unitary Development Plan 2006 Saved Policies 2013 (UDP) and the South London Waste Plan 2012.

7.2 Government guidance is contained in the National Planning Policy Framework (NPPF), issued in March 2012. The NPPF 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. The NPPF identifies a number of key issues for the delivery of sustainable development, those most relevant to this case are:

- Promoting sustainable transport;
- Delivering a wide choice of high quality homes;
- Requiring good design.

7.3 The NPPF in paragraphs 79 to 92 sets out government guidance on development within and protection of Green Belt.

7.4 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 3.6 Children and Young People's Play and Informal Recreation Facilities.
- Policy 3.16 Protection and Enhancement of Social Infrastructure.
- Policy 3.18 Education Facilities
- Policy 3.19 Sports Facilities
- 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 6.1 Strategic Approach
- Policy 6.3 Assessing Effects of Development on Transport Capacity
- Policy 6.9 Cycling
- Policy 6.13 Parking
- Policy 7.2 An Inclusive Environment
- 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

7.5 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.

7.6 Croydon Local Plan: Strategic Policies 2013 (CLP1):

- SP1.1 Sustainable development
- SP1.2 Place making
- SP1.3 and SP1.4 Growth
- SP3 Employment
- SP4. Urban design and local character
- SP5 Community facilities
- SP6 Environment and climate change
- SP7 Green grid
- SP8 Transport and Community
- Shirley: Places of Croydon

7.7 Croydon Replacement Unitary Development Plan 2006 Saved Policies 2013 (UDP):

- UD2 Layout and siting of new development
- UD3 Scale and design of new buildings
- UD6 Safety and security
- UD7 Inclusive design
- UD8 Protecting residential amenity
- UD9 Wooded Hillsides and Ridges
- UD13 Parking design and layout
- UD14 Landscape design
- UD15 Refuse and recycling storage
- UC10 Historic Parks and Gardens
- UC11 Development Proposals on Archaeological Sites
- R01 Metropolitan Green Belt and on Metropolitan Open Land
- R03 Changes of Use of Existing Buildings
- R06 Protecting the Setting of Metropolitan Green Belt and MOL
- R09 Education Open Space

- RO15 Outdoor Sport and Recreation
- NC1 Site of Nature Conservation Importance
- NC2 Specially Protected and Priority Species and Their Habitats.
- NC3 Nature Conservation Opportunities Throughout The Borough
- NC4 Woodlands, trees and hedgerows
- EP1 Control of Polluting Uses
- EP2/EP3 Land Contamination
- EP15/EP16 Energy
- LR3 Loss of Leisure
- CS1 Community Facilities Including Education
- T2 Traffic generation from development
- T4 Cycling
- T8 parking

7.8 CLP1.1 and Croydon Local Plan: Detailed Policies and Proposals CLP2.

The partial review of CLP1 entitled CLP1.1, as well as a new document CLP2, are both nearing formal adoption. The public examination took place between 16th May and 31st May 2017. The appointed Planning Inspector has examined the Partial Review of CLP1.1 and CLP2, and in his report dated 16th January 2018, found both documents to be sound, subject to a number of main modifications being made to it. The documents are expected to be adopted by the end of February.

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 Highway, Parking, Transport Network and Pedestrian Safety.
- Impact on Neighbouring Properties Living Conditions.
- Trees, Landscaping and Biodiversity.
- Flooding, Sustainability and Environment.
- Equality.
- Other Planning Matters.

Principle of Development/Land Use

Metropolitan Green Belt

8.2 The entire site is currently located within the Green Belt. Paragraphs 79 to 92 of the NPPF sets out Government's guidance on development within the Green Belt. Paragraph 89 states that local planning authorities should regard the construction of new buildings as inappropriate in Green Belt unless certain exceptions apply. None of the exceptions outlined in paragraph 89 apply to this

development, and therefore the development as per the definition set out in the NPPF, is defined as inappropriate.

- 8.3 Paragraph 87 of the NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 88 states that when considering a planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.
- 8.4 To be able to assess the acceptability of developing on the green belt, a true balancing assessment is therefore required that weighs circumstances which, taken together, constitute very special circumstances, against harm caused by reason of inappropriateness and 'any other harm'. This assessment has been carried out in section 9 of this report, where it is concluded that very special circumstances, do outweigh the harm caused by reason of inappropriateness and 'any other harm'.

Positive Weight to Schools

- 8.5 Paragraph 72 of the NPPF states that great weight should be given to the need to create, expand or alter schools. Policy 3.18 of the London Plan states that development proposals which enhance education and skills provision will be supported, including new build to change of use to education purposes. The policy states that proposals which address the projected shortage of secondary school places will be particularly encouraged. Policy SP5 of CLP1 is generally supportive of investment to new schools, and the expansion and improvement of existing schools. Policy R09 states that the Council will allow education related development on Educational Open Space provided there is an identified need for the development and any harm to the open space is minimised. Emerging Local Plan CLP2 proposed submission allocates the site (no.662) as 'secondary school with retention of playing pitches', and this has been accepted in the inspectors report.

Ensuring Sufficient Secondary School Places

- 8.6 There is an urgent need to increase primary and secondary school capacity in London Borough of 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%. The proposed development would increase this surplus to 251 places, which amounts to 6%, thus ensuring sufficient surplus.
- 8.7 It is worth noting that a deficit in school places is forecast to start to occur from 2019/2020. Whilst the proposal presented here is only for a temporary period up to September 2019, approving planning permission for this development would

substantially increase the likelihood that a permanent school would be established on this site. In the event that planning permission was not granted for a permanent school, then there would likely be a need to find an alternative site/provision. Approving planning permission would significantly increase the probability that a permanent solution to addressing school place deficit, whether on this or an alternative site, would be found, by acting as an effective stopgap.

Alternative Locations for Secondary Schools

- 8.8 The applicant has submitted a sequential assessment which assesses all the available sites within the South of Croydon area, and then a detailed assessment of all the identified sites within the school travel catchment area.
- 8.9 The sequential test set out by the applicant demonstrates that there are no other suitable locations for a secondary school within the area and school travel catchment area to address the limited supply of secondary school places in 2018/2019. Due to the nature of funding and the immediate need for the development, it is also not considered to be a realistic proposition to address this shortfall through extensions to existing schools. The need for this temporary school to be delivered on this site by September 2018 is critical.

Emerging Local Plan

- 8.10 Paragraph 216 of the NPPF provides guidance on the weight that can be given to emerging plans. Paragraph 216 states:

“From the day of publication, decision-takers may also give weight (unless other material circumstances indicate otherwise) to relevant policies in emerging plans according to:

- the stage of preparation of the emerging plan (the more advanced the preparation, the greater weight that may be given).
- the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).”

- 8.11 As set out in paragraph 009 of the National Planning Policy Guidance “*The law makes a clear distinction between the question of whether something is a material consideration and the weight which it is to be given... Provided it has regard to all material considerations, it is for the decision maker to decide what weight is to be given to the material considerations in each case, and (subject to the test of reasonableness) the courts will not get involved in the question of weight.*”
- 8.12 The current Croydon Local Plan Strategic Policies (CLP1) was adopted in April 2013. A partial review of this document, known as CLP1.1, is in a very advance stage of adoption. The appointed Planning Inspector has examined the Partial Review of CLP1.1, and in his report dated 16th January 2018, found the Partial Review to be sound, subject to a number of main modifications being made to it.

8.13 In the main modifications the inspector stated the following regarding the proposed application site:

“Site 662 (insert – i.e. the application site) is owned by the Council and so the risk of the school not proceeding on this site is slight. It abuts existing residential development to the west and south so its development would have a limited effect on the extent of the openness of the Green Belt in this vicinity. The case for developing a school on site no.662 is both immediate and certain. There does not appear to be any other non-Green Belt sites presently available. This represents the exceptional circumstances in which an alteration to Green Belt boundaries can be countenanced. I recommend a modification to this effect.”

The whole of the application site is therefore proposed to be removed from the Green Belt in CLP1.1 of the Emerging Local Plan.

Sports Pitches

8.14 Paragraph 74 of the NPPF states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, building or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality is suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

8.15 Also of relevance is London Plan Policy 7.13, CLP 1 policy SP7.3 (d) and Emerging Plan Proposed Submission Policy SP7.3 (d) and Saved UDP Policies R015 and LR2.

8.16 The applicant has indicated in their planning statement that the sports pitches are only used by 1 junior league football team on Sundays. Sports England dispute this and have evidenced regular use for the site in recent history for cricket, including by Croydon Cricket Club of India, on both Saturdays and Sundays. They also believe that the site is used regularly at the weekends for football, and that the site has been used for rounders, as well as informally by joggers.

8.17 Officers have researched the use of the playing fields and are of the view that the site is more intensely used than suggested by the applicant. The council have evidence that indicates in addition to the uses highlighted above by Sports England that the site has also been used for athletics. In the recent past the site has contained a running track, javelin, long jump area and shot put throwing area. It is also noted that one of the objections states that the site was previously used by Archbishop Tension’s School as playing fields. Nevertheless, critically Sport England do not object and even when the site is intensely used the council are satisfied that there are still areas of surplus land not being used/required.

- 8.18 It should be noted that this area is well served by both formal and informal sports and leisure facilities and clubs including Lloyd Park, Coombe Park, John Ruskin Playing Field, Shirley Park Golf Club, Crobham Hurst Golf Club, Whitgift Sports Club, Addiscombe Hockey and Cricket Club and Addington Hills.
- 8.19 The proposed temporary school building would be located on the pre-existing hard surface. The only encroachment onto the grassed areas of the site where sports pitches are located would be the new hard/soft play area, the new seven bay car park area, perimeter fencing cycle, drainage trench and bin storage. This represents a very small percentage of the overall site. Whilst there would be a technical loss of playing field area, there is still considered to be sufficient land left after the development was complete to provide the same level of sports and leisure facilities/pitch provision.
- 8.20 The existing pavilion is in a poor state of repair, and understood to have been boarded up for health and safety reasons. It is unlikely given local authority funding restrictions that the pavilion would come back into use in the foreseeable future. It is noted within Sports England's response that Croydon Cricket Club of India have previously expressed an interest in the site. It is not considered that this can be given significant weight as there is not significant evidence that such an offer would be accepted. The applicant has agreed that they will allow the use of the temporary building (which includes changing rooms/toilets) by the community. The applicant has confirmed they will manage the community facilities and will encourage the site to be more intensely used than at present. Condition (15) is recommended requiring a community use agreement to be submitted and approved in writing.
- 8.21 Sports England raise no objection to the scheme subject to conditions 14 to 19. These conditions are recommended and accordingly the scheme is supported.
- 8.22 In conclusion, subject to condition, whilst there would be a technical loss of playing field area, there would not be an adverse impact on sporting pitch/facility provision. The loss of playing field area would be offset via a community use agreement that would actively encourage the site to be more intensely used at present.

Townscape and Visual Impact, Impact on Heritage Assets

Heritage Assets

- 8.23 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.
- 8.24 The NPPF requires a great weight to be placed on the protection of heritage assets. A pragmatic approach is advocated at national level by the NPPF, between balancing the need and benefits of development and the protection of heritage assets. Chapter 12 of the National Planning Policy Framework (NPPF, 2012) provides direction to decision makers on development which could affect listed buildings. Paragraphs 131-134 of the NPPF are of most relevance. In

determining planning applications, local planning authorities are directed to take account of *“the desirability of sustaining and enhancing the significance of heritage assets...the positive contribution that conservation of heritage assets can make to sustainable communities...[and] the desirability of new development making a positive contribution to local character and distinctiveness”*.

- 8.25 The applicant has submitted a heritage assessment entitled ‘Cultural Heritage Desk Based Survey’. This study considers all of the surrounding heritage assets including archaeological remains, and assess the development’s direct and indirect impact on them and their setting.
- 8.26 In terms of impact of the development on surrounding listed buildings and their setting, the assessment identifies a ‘very slight adverse indirect effects on the grade II listed Coombe Lodge.’ This is considered to be an accurate assessment of the development impact on surrounding listed buildings and their setting. Due to the orientation of Coombe Lodge, windows on this property generally face in a northerly and southerly direction, and not over the application site. There is a conservatory at ground floor level on the western flank of the property, but there is likely to be no views of the development from this conservatory due to the slope of land, mature vegetation and separation distance of approximately 200m. The development is likely to be visible from some parts of the grounds, both original and historic of Coombe Lodge, but these are only likely to be glimpse background views due to maturity of planting and separation distance. There is the possibility that the site, had a historical connection with the wider Coombe Estate that contains a number of listed buildings, but this connection, other than the name of the site has largely been lost. Any adverse impact on heritage assets would be temporary.
- 8.27 The site is surrounded by a number of local listed parks and gardens including Geoffrey Harris House/Coombe House, Lloyd Park and Royal Russell School, which are located to the north, east and west of the site. The development would only have a minor impact on views from these locally listed parks and gardens with the mature planting, trees and roads/tramway helping to obscure views.
- 8.28 The site is located within an Archaeological Priority Zone. The application has been reviewed by Historic England’s Greater London Archaeological Advisory Service (GLAAS), who have concluded that the development is unlikely to have a significant effect on heritage assets of archaeological interest.
- 8.29 Paragraph 134 of the NPPF 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. However, this paragraph should be read in the context of Paragraph 132 of the NPPF 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.’
- 8.30 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.

Bulk, Mass and Design

- 8.31 The proposed temporary building would 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 is well sited away from neighbouring properties and set back from the road, which helps to retain a sense of openness, as well as limiting the buildings impact on the most common viewpoints. It has 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 clearly less than the Council would normally require for a permanent solution, and expect, 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 green belt setting. This is recommended to be secured via condition.
- 8.32 The proposed school is fit for purpose, and designed to meets all guidelines and minimum school sizes as set in the Building Bulletin 103: Area Guidelines for Mainstream Schools. There will be disabled facilities provided within the school with a disabled parking space, shallow DDA compliant ramp, accessible toilet and adequate corridor widths. Whilst disabled access would not be provided to the upper floor, given that there are sufficient facilities at ground floor level and the temporary nature of the application, no objection is raised.
- 8.33 The location of the building and condensed built form will help to ensure that when the use ceases that the land can be returned to its existing state in an efficient manner. At the same time, the location and siting of the development has been chosen in order to not limit the potential development of the site for a permanent school. The proposed mass, bulk and design of the development on balance is considered acceptable.

Impact on Neighbouring Properties Living Conditions

- 8.34 The proposed temporary building would be located over 125m away from residential properties in Melville Avenue to the west, and nos. 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.
- 8.35 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.
- 8.39 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 are 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 in the centre of the site away from the neighbouring properties, which will help mitigate their impact. Fencing is proposed around the access routes which will help confine activity and associated noise from comings and goings. There will be staff/parental supervision at the entrance of school at the start/end of the day, which will help 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.

8.40 The proposed development would have an acceptable impact on neighbouring properties' privacy. Intensely used areas of the site including play areas are located centrally, 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.

8.41 In order to make the school safe for use in the winter, greater levels of external lighting will be required. To ensure the impact of this is appropriate mitigated and controlled, condition 21 is recommended.

8.42 The applicant's noise survey indicates that mechanical ventilation may be required to achieve acceptable sound levels within the temporary classroom. Conditions (12) and (13) are recommended to secure additional details on any plant/ventilation system and to ensure that any such equipment would not cause harm to neighbouring properties' living conditions.

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

Trip Mode

8.43 The applicant has estimated the likely level of trips based on pupil/staff numbers and the travel data from an outer London borough school. This data has then been adjusted to reflect the characteristic of the site. Based on 180 pupils, the adjusted trip data produced by the applicant is as follows:

Car	36 Pupils
Car Share	9 Pupils
Tram	36 Pupils
Public Bus	36 Pupils
Cycle	9 Pupils
Walking	54 Pupils

8.44 Officers having compared the data produced by the applicant with our own understanding of the site, as well as using data from two comparable Croydon

schools, namely Quest Academy and Shirley High School. Using these comparisons officers are satisfied with the applicant's estimates.

8.45 In terms of staff, it is forecasted based on Census data that six of the staff would travel to the school by car, two by bus, one by rail and one by foot. Condition (23) and a legal agreement are recommended to secure a travel plan to encourage sustainable modes of transport.

Parking Impact

8.46 The applicant's Transport Assessment estimates that in worst case scenario 46 vehicles would be involved in dropping off or picking up of pupils. However, it should be noted that these 46 vehicles would to some extent be spread, especially with pre and after school clubs. No on-site parking for pupils/parents is proposed.

8.47 The applicant has produced a parking survey. The parking survey was undertaken on Tuesday 29th November 2016, in the morning between 07:45 and 09:15, and again in the afternoon between 16:00 to 17:30. The applicant has identified 77 free spaces at 9am, and 73 free spaces at 4pm, within a 400m radius of the school. However, it is apparent from analysing the parking data that the vast majority of these spaces, as well as the most likely spaces to be used by parents are located within the Council run Lloyd Park car park.

8.48 Lloyd Park car park has 70 car parking spaces in total which is split into 53 regular parking spaces, 4 disabled parking spaces and approximately 13 unmarked bays. 11 cars in total were in this car park at 8:45am (59 free), and 22 cars (48 free) in total at 4pm on the 29th November 2016.

8.49 In acknowledgement of the development's reliance on Lloyd Park, the applicant is proposing the use of a 'School Travel Management Plan (STMP)'. The STMP would enforce the use of Lloyd Park as drop off/ pick up point. In addition the STMP proposes the following:

- A minibus service picking up at the start of the day / dropping off pupils at the end of the day from/to St Peters and at Park Hill Junior Schools would be provided thus reducing the impact on trips to the site and stress on parking. The applicant's trip number have not included the impact of this mini bus service. As such the applicant's trip number by private car could significant drop from estimates provided.
- Staggering school start times from the traditional time in order that the aforementioned minibuses could tie in pick up at St Peters / Park Hill with parents dropping off siblings at those schools. This would help minimise any potential cumulative impact associated with the drop off at other schools in the local area. Condition (11) is recommended to require the school to confirm opening/closing hours prior to the commencement of the use.
- Staff / parental supervision of the pelican crossing adjacent to Lloyd Park and the proposed crossing of Melville Avenue at both the beginning and end of the school day ensuring pupils use the safest route from the car park, to ensure pupils are appropriately managed to prevent accidents, and to help monitor/control pupil behaviour.

8.50 It is acknowledged that the use of Lloyd Park car park would cause some inconvenience to other users of Lloyd Park. Despite this, no objection is raised given that this is only a temporary issue, that there would still likely be adequate number of parking spaces for users of Lloyd Park, and given the importance to the borough's education provision that this school is open in time for September 2018. The three hour parking restriction on the car park will ensure that the inconvenience to other Lloyd Park users is only likely to be for a short period of time at the start/end of day.

8.51 For staff, six car parking spaces are proposed which would be sufficient to cope with the expected demand, one of which would be a disabled space. There would also be one on site space for visitors.

8.52 Subject to condition 22 securing the STMP, the development's impact in terms of parking and the proposed level of parking provision is considered acceptable.

Tram Network Impact

8.53 The application has been reviewed by Transport for London (TfL) who has confirmed that the likely number of pupil/staff using the tram would not be such that it would cause significant capacity issues. TfL has also confirmed that parents/pupils using Lloyd Park car park and associated access road would not significantly impact the tram network. The proposed development would not therefore have an adverse impact on the operation of the tram network.

Highway Capacity Impact

8.54 The impact of the development on four priority junctions has been modelled, Coombe Road/Melville Avenue, Melville Road/Croham Road, Castlemaine/Coombe Road and Coombe Road/Croham Park Avenue. The model includes the impact of parents using Lloyd Park car park for pick up/drop off, as well as from the new proposed one way junction at Coombe Road and Melville Avenue (see option 1 below). The modelling shows that the development would have some impact on traffic movements, but are within acceptable thresholds and as such the congestion and delay experienced by road users would not be noticeable.

Cycle Parking

8.55 Two areas for covered cycle parking has been indicated on submitted plans, one for staff and one for pupils. The exact quantum of provision has not been indicated. Condition 24 requiring further details to be provided and at least 12 cycle parking spaces is recommended. This is based on the 9 pupils predicted to travel by bike, plus an additional 3 cycle parking spaces for visitors/as a safety buffer.

Highway Alterations and Pupil Safety

8.56 To ensure that there is a safe crossing point for pupils/pedestrians to reach the school from the west, the applicant is proposing to create a raised pedestrian crossing at the junction of Coombe Road and Melville Avenue (option 1). To be safe, and to prevent queues forming on Coombe Road, the end of the road would

be made one way and cars would be prevented turning into Melville Avenue from Coombe Road.

- 8.57 The applicant has carried out a stage one safety audit for this option. The safety audit does not highlight any significant problems which could not be resolved through detailed design. Option 1 would require a Traffic Regulation Order (TRO). Whilst the order would be subject to consultation, initial conversations with relevant colleagues have indicated that this option has a strong chance of being deliverable.
- 8.58 The applicant has a back-up option should the TRO not be accepted i.e. option 2. Option 2 proposes a pedestrian crossing to the south of the school. Whilst this may provide a suitable alternative, at this stage it is too undeveloped to be fully accepted. Condition 3 and the legal agreement are therefore recommended to ensure that adequate safety measures are in place prior to the commencement of the development, and subsequent to the commencement of the use.

Junction Visibility

- 8.59 An objection has been received from the Whitgift Foundation who amongst other things are concerned about visibility at junction of Melville Avenue/Coombe Road for cars due to the presence of four maple street trees on the grass verge to the east of the junction.
- 8.60 The potential alterations to the junction would not in itself create additional obstructions, and may in fact reduce risk to some degree from the removal of the cars turning into Melville Avenue. There would, nevertheless, be an increased number of cars turning out of Melville Avenue. To improve visibility and safety at this junction, the applicant has indicated that they would be willing to fund the removal of two trees and for them to be replaced elsewhere. This would in officer's view appropriately mitigate the small amount of increased risk generated by the development. This would be secured through the legal agreement.

Waste

- 8.61 Information submitted by the applicant has been reviewed by the Council's Waste Team who are satisfied with the levels of provision and details submitted.

Trees, Landscaping and Biodiversity.

- 8.62 The applicant has produced an arboricultural assessment and method statement. The application has been reviewed by the Council's Arboricultural officer who has raised no objection. One dead tree is proposed to be removed. Whilst there are a number of trees which could potentially be impacted by the development, all of moderate or poor quality rated B, C and U. The applicant's statement outlines a number of appropriate measures to ensure existing trees are retained and protected during the site development. Further details are required in regards to the construction of the proposed hard surface adjacent the boundary trees and for the construction of the boundary fence adjacent the trees to ensure that existing trees are not harmed. This is recommended to be secured via condition 5. Where tree removal is unavoidable, then condition 6 is recommended requiring soft landscaping and the planting of replacement trees

to ensure that the development does not have an adverse impact on visual amenity.

Ecology and Biodiversity

- 8.63 The southernmost part of the site is located in a Site of Nature Conservation Importance. The applicant has submitted an 'Ecological Assessment' and a 'Bat Mitigation and Enhancement Plan' with their application. 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.
- 8.64 The site as a whole contains habitat value for breeding birds, bats, reptiles and amphibians. A number of mitigation and enhancement measures are outlined within the ecological assessment and bat mitigation plan, and these are recommended to be secured by condition 10. Protected flora and fauna is sufficiently safeguarded.

Flooding, Sustainability and Environment.

- 8.65 The site is modelled as being at risk from surface water flooding on a 1 in 100 year basis. The submitted 'SUDS Statement' which proposes the installation of an infiltration trench. The existing and proposed impermeable areas, including from the proposed building, would discharge directly into the infiltration trench. This would be sufficient to accommodate all storm events up to and including the critical 1 in 100 year event. Subject to a condition 4, the proposed development would not have an adverse impact on flooding.

Sustainability and Energy

- 8.66 The development is only for a temporary period of a year, 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 will also significant limit construction impacts and reduce vehicle movements.
- 8.67 Renewable energy technologies such as solar photovoltaics are not feasible in this instance given that the imbedded energy payback is significantly longer than the lifespan of the development.
- 8.68 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.
- 8.69 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

- 8.70 The Air Quality assessment has considered exposure to onsite receptors, but has not considered Air Quality neutral calculations. Due to the nature of the development there are only limited options. Condition 23 requires the submission of a travel plan that includes a 'No Idling Engines' strategy statement. The developments impact on air quality is considered to be acceptable.
- 8.71 The submitted Air Quality assessment also considers the impact of locating the school adjacent to Coombe Road, and the impact this may have on pupils/staff. The assessment concludes that following on from three months of monitoring, that on-site mitigation measures are not necessary.

Land Contamination

- 8.72 The application has been reviewed by the Council's Land Contamination Officer who raised no objection to the application. They have recommended condition 8 to be added given the possible presence of infilled land and the associated risk.

Equality

- 8.73 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. Measures have been taken in the building's design to ensure it is accessible for all.
- 8.73 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. It is considered that 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.
- 8.74 Subject to conditions, the proposed development is not considered to undue discriminate on behalf of age, disability, gender, relationship, pregnancy, race, religion, sex and sexual orientation. The development in general is considered to benefit all.

9.0 Balance of Decision and Conclusion

If at time of decision notice the site is not in the Green Belt

- 9.1 The consideration of this case is complicated by the fact that planning decisions have to be issued on the basis of policies in place at the point the decision is issued, not at the point that the application is considered by committee. Whilst the Emerging Local Plan, at the date of the publication of this report, and on the date of the committee, would not have been adopted, in all likelihood at the point at which a decision would be issued the Emerging Local Plan would be adopted and the site would no longer be designated Green Belt. The delay in issuing the decision would be due to the need to finalise the legal agreement, as well as need to refer the application both to Mayor of London under Stage 2 and to Central Government. Whilst the Emerging Local Plan cannot be given full weight

at this stage if a decision was issued today, it is a near certainty that when the decision is issued, that full weight would be required to be given to the Emerging Local Plan.

- 9.2 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.
- 9.3 The development would have a negligible impact in terms of sports provision, parking, highway, transport network, pedestrian safety, neighbouring properties' living conditions, trees, biodiversity, flooding, environment, and any other material planning consideration.
- 9.4 If a decision is issued after the Emerging Local Plan has been adopted, which de-designates the site from the Green Belt, it is therefore recommended for the reason outlined above that planning permission be granted, subject to conditions.

If at time of decision notice the site is still in the Green Belt

- 9.5 Officers are of the view that there are significant circumstances which, when taken together, constitute very special circumstances. These are in summary as follows:
- Positive weight to schools.
 - Significant deficit in secondary school places.
 - Emerging local plan evidence base, as well as the applicant's sequential test which both confirm the absence of alternative sites.
 - That considerable weight can be given to the emerging local plan in light of its advance state of adoption.
- 9.6 These circumstances need to be weighed against the negatives of the development, some of which are only relevant if the site remains in the Green Belt.
- 9.7 The proposed development is inappropriate development by virtue of constructing new buildings within the Green Belt, and because the development would not meet any of the exceptions outlined within paragraph 89 of the NPPF. The development would increase the sprawl of Croydon and would represent encroachment into the countryside. The proposed development would have an adverse impact on openness of the Green Belt. The proposal would increase the likelihood that further development, most likely a permanent school, would occur on this site, which in turn would have an even greater detrimental impact on the purpose, openness and character of the Green Belt. It could be argued that the development would also lessen the pressure of the development of other brownfield sites, although this point is somewhat negated by the council's

evidence base for the Emerging Local Plan and by the applicant's sequential assessment which shows that there are no suitable alternative sites.

- 9.8 In addition to the harm to the Green Belt, there would be less than substantial harm identified to both nationally and locally designated heritage assets, and the effects of the architectural quality of the development on general visual amenity.
- 9.9 The development would have a negligible impact in terms of sports provision, parking, highway, transport network, pedestrian safety, neighbouring properties' living conditions, trees, biodiversity, flooding, environment, and any other material planning consideration.
- 9.10 The set of circumstances outlined above, in officers' view do amount to very special circumstances, which outweigh the harm to the Green Belt, even when substantial weight is given to this harm, plus any other harm identified in the main body of the report, including less than substantial harm to designated heritage assets (even with given great weight given to their conservation), and the effects of the architectural quality of the development on general visual amenity.

Overall Conclusion

- 9.11 In conclusion, irrespective of whether the site remains in, or is removed from the green belt at the point of decision, planning permission is recommended to be granted.
- 9.12 All other relevant policies and considerations, including equalities, have been taken into account.