

PLANNING STATEMENT

In respect of:
Refurbishment, remodelling and extension
of existing school building to create a new
90 pupil SEMH School with Sixth Form

At:
**FORMER WOODSIDE SCHOOL,
HALT ROBIN ROAD, BELVEDERE, DA17 6DH**

For:
GALLIFORD TRY

on behalf of the applicant the:
London Borough of Bexley

MAY 2021

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1 INTRODUCTION

- 1.1 This Planning Statement has been prepared for Galliford Try on behalf of the Department for Education and relates to the proposed refurbishment, remodelling and extension of the existing school buildings previously occupied by Woodside School.
- 1.2 The proposals which also include external works to enable the creation of improved access, a multi-use games area and parking are proposed to bring the building and site up to modern standards and bring it back into educational use to be occupied by Cornerstone SEMH school.
- 1.3 The application site forms part of the former Woodside School site that closed in October 2017, the existing main building is located in the southeast corner of the site proposed. The site is located in Belvedere and within the London Borough of Bexley. The northeast part of the former Woodside School site is not included within this application and there are no immediate plans for that part of the site.
- 1.4 The proposals include the provision of improved vehicle and pedestrian access from Halt Robin Road. The proposal includes car-parking spaces to the rear of the site accessed from the eastern end of Halt Robin Road along the site's eastern boundary. Social/amenity spaces are proposed to the north of the existing and proposed buildings. The site has a number of significant level differences and also has a number of trees in the areas to the south of the existing school building and along its northern boundary.
- 1.5 In order to facilitate the proposed extension of the existing main building an existing small single storey extension built in the 1970's will be demolished and a portacabin building will also be removed from the site.
- 1.6 There is an identified need for provision for children with complex needs within the London Borough of Bexley. The gap in current provision results in a number of children with specific needs being placed in schools outside of the borough sometimes resulting in long travel times for pupils. The proposed Cornerstone School subject of this application will fill this gap to meet local needs. The proposals would provide spaces for 90 children with SEMH and ASD.
- 1.7 This Planning Statement sets out the details of the development proposals and considers these in the context of the relevant policies within the Statutory Development Plan and other material planning considerations. It is structured as follows:
 - Section 1 – Introduction
 - Section 2 – Background
 - Section 3 – Site Description (including planning history)
 - Section 4 – Proposed Development
 - Section 5 – Planning Policy Assessment
 - Section 6 – Consultation
 - Section 7 – Key Planning Considerations
 - Section 8 – Green Belt
 - Section 9 - Planning Benefits of the Proposed Development
 - Section 10 – Conclusions
- 1.8 This Planning Statement should be read alongside the following documents prepared by other members of the development team:

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Document	Author
Detailed Architectural Drawings	Pozzoni Architects
Design and Access Statement	Pozzoni Architects
Landscape Drawings	UBU Design
Noise Impact Assessment	Acoustic Consultants Ltd
Fire Statement	FDS Consult UK
Flood Risk Assessment	AKS Ward
Foul & Surface Water Drainage Strategy Report	AKS Ward
Energy and Sustainability Statement	Couch Perry Wilkes
External Lighting/CCTV Plan	Couch Perry Wilkes
BREEAM Tracker – New Build BREEAM Pre-assessment – New Build BREEAM Tracker - Refurbishment BREEAM Pre-assessment – Refurbishment	Storma Built Environment
Travel Plan	Cundall
Transport Assessment	Cundall
Car Park Management Plan	Cundall
Ecological Assessment	Bakerwell
Site Investigation Phase 1 Site Investigation Phase 2	Lustre Consulting
Arboricultural Impact Assessment	Arconarb
Construction Environmental Management Plan	Galliford Try
Statement of Community Involvement	Thorncliffe
Air Quality Assessment	Storma Built Environment

- 1.9 The proposals have been the subject of pre-application consultation with the London Borough of Bexley's Planning Department. An on-line public consultation was also undertaken.
- 1.10 Full planning permission is sought for the proposals subject of this Statement. For further details of the layout, design and the teaching environment that the proposed development will facilitate please refer to the Design and Access Statement prepared by Pozzoni Architects, further details of the proposed development are also set out within Chapter 4 of this Statement.

2 BACKGROUND

- 2.1 This chapter of the statement provides a brief background to the development of the proposals. It gives an overview of the relevant companies and organisations involved and the steps taken in bringing the proposals together.

Organisations and Companies

Department for Education

- 2.2 The Department for Education (DfE) is a Government Department responsible for providing all aspects of state funded education for 8 million children aged 3 to 16 and 1.8 million young people aged 16 to 19. Among the department's responsibilities are the funding and monitoring of schools.
- 2.3 The DfE have a collaborative working relationship with local authorities and other providers of education and take a lead in locating suitable sites for new schools and identify the needs and opportunities for the renewal of teaching accommodation at existing school sites. The DfE lead on the procurement and tendering process.

Galliford Try

- 2.4 Galliford Try is a leading construction company, carrying out building and infrastructure works across the UK through the expertise of several regional offices. Galliford Try are one of the country's leading contractors in the education sector, with an order book for schools and colleges worth more than £1 billion. A key partner for the DfE, Galliford Try has a proven track record of promoting sustainable and innovative design solutions in the delivery of schools of all sizes in locations throughout the country.
- 2.5 During 2018/2019 Galliford Try's expertise in the delivery of new education buildings and facilities was acknowledged at the Education Estates Awards (2018) where they won awards for Contractor of the Year, Project of the Year and the Innovation in Delivering Value award and followed this up at the 2019 awards with the award for Pupil/Student Experience.

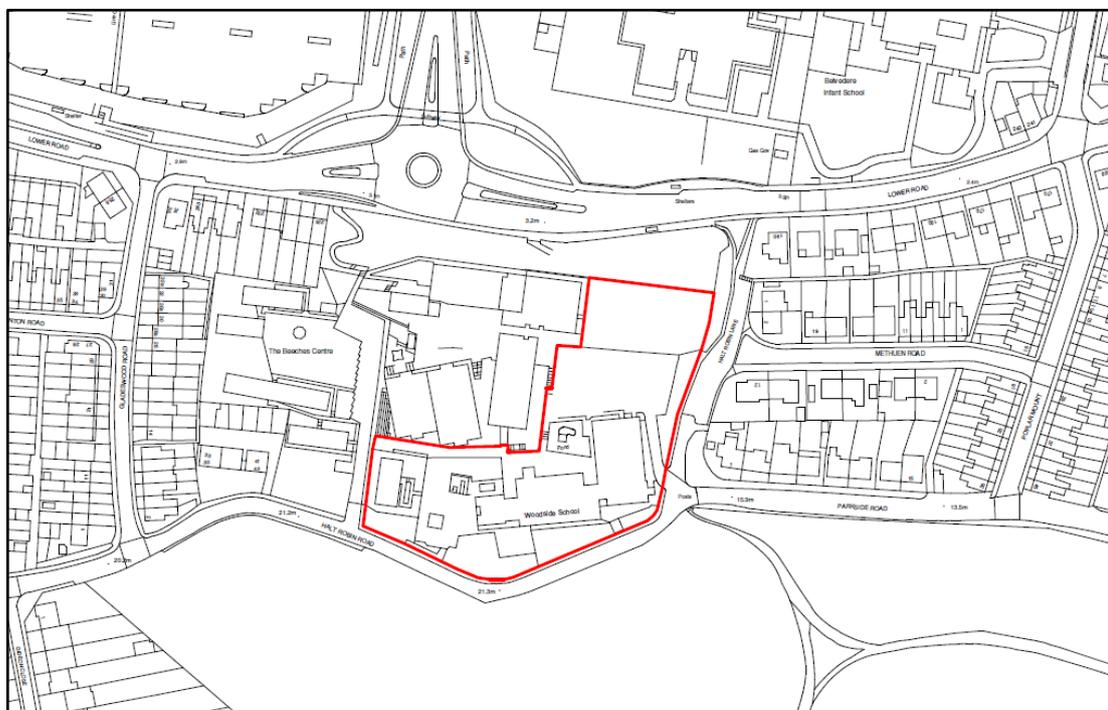
Trinitas Academy Trust

- 2.6 Trinitas Academy Trust is a Multi-Academy Trust currently with 6 schools all located within the London Borough of Bexley. The Trust has implemented ideas and initiatives that have transformed the opportunities of pupils from working class and disadvantaged backgrounds.
- 2.7 The Trust are committed to improving society through the work that they do and the educational outcomes that they facilitate for all of the pupils within their schools. The proposed Cornerstone School has been developed in full consultation with the senior leaders from the Trust so that the proposed facility meets with the specific teaching requirements of the teachers and pupils accommodating their needs in every way possible.

3 SITE DESCRIPTION

The Application Site

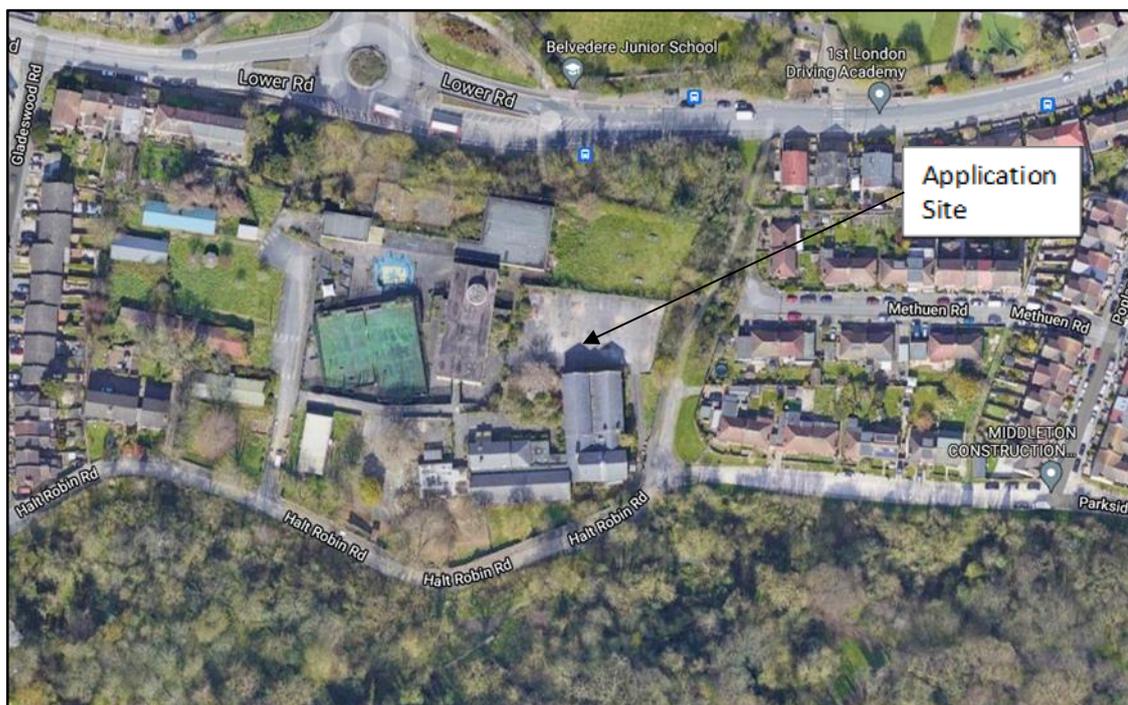
- 3.1 The application site forms part of the former Woodside Sports School in Belvedere and has an area of 0.85ha. The site is located to the north of Halt Robin Road and south of the B213 which form the southern and northern boundaries of the site respectively.
- 3.2 The eastern boundary is shared with a pedestrian pathway that connects the eastern end of Halt Robin Road with the B213. Beyond this pathway are residential properties located on Parkside Road and Methuen Road. The western boundaries of the site are shared with the part of the Woodside School site not included within this application beyond which are further residential areas.
- 3.3 The application site itself contains significant changes in levels with a difference of 18m from north to south. Two substantial retaining walls of up to 4m in height run from east to west across the site. Both the northern boundary and southern boundary have dense vegetation and mature trees.
- 3.4 The site is accessed at the eastern edge of the site, here Halt Robin Road terminates with only pedestrian access through to Parkside Road and the B213. A vehicle access provides a route through to an existing parking area.
- 3.5 The existing buildings occupying the site are located in the southern part of the application site. The main building dates from circa 1915 and has an 'L' shaped plan form. The main building has a single storey extension that appears to have been constructed in the 1970's. Towards the western boundary of the site is a portacabin style building. There are large areas of hardstanding extending to the west and north of the main building.



(Figure 3.1: Site Location Plan)

The Surrounding Area

- 3.6 The site is located within the administrative boundary of the London Borough of Bexley and to the south of Belvedere.
- 3.7 In the wider area to the northeast of the site is the Belvedere Industrial Area comprising a number of substantial warehouse style buildings. Beyond this area and in the wider area to the east of the application site the River Thames is located.
- 3.8 In the areas to the west and south the land uses are more residential with large areas of suburban housing comprising a mixed and varied housing stock include flats and houses of all types.



(Figure 3.2: Aerial Image)

Planning Policy Designations

- 3.9 The adopted Development Plan for the London Borough of Bexley comprises; the London Plan (2021), Bexley's Core Strategy (2012), and saved elements of the Unitary Development Plan (UDP) (2004, as saved from 2012).
- 3.10 The Policy Map extract on the following page shows the relevant planning policy designations for the site and its surroundings. The site itself is land specifically designated for Educational Buildings and Playing Fields. Land to the north of the application site on the opposite side of the B213 shows another site allocated for educational use, this site is occupied by Belvedere Infant and Junior School.
- 3.11 Land to the south of the application site on the opposite side of Halt Robin Road is identified as an area of Metropolitan Importance for Nature Conservation

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(Figure 3.3: Extract from Bexley Policies Map)

3.12 The application site is not located within a conservation area and there are no listed buildings within 500m of the application site.

3.13 The site is within Flood Zone 1 and therefore is at the lowest risk of flooding.

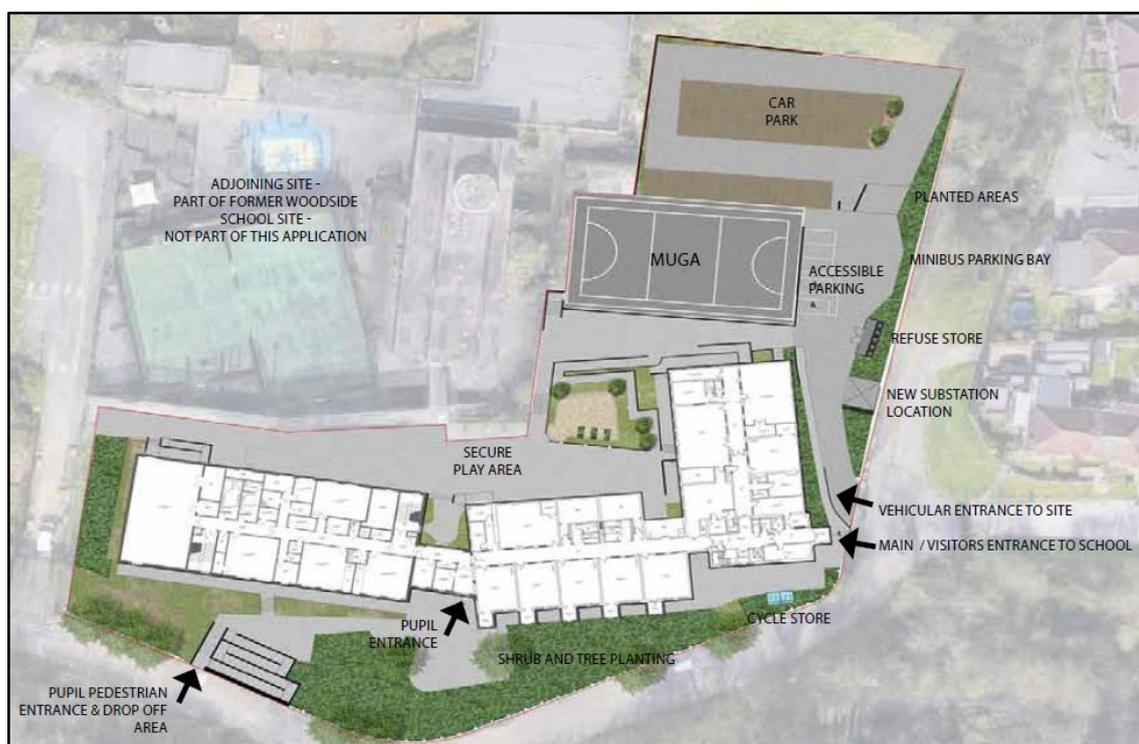
Planning History

3.14 A review of the publicly available planning records has revealed that there are no recent or relevant planning applications associated with the application site.

4 PROPOSED DEVELOPMENT

4.1 Planning permission is being sought for:

- The extension, refurbishment and remodelling of the existing school building to facilitate a new 90 pupil SEMH school (Cornerstone School).
- The proposed extension is a two-storey building located to the west of the original school building and connected via a single storey link building, the total area of the extension is 1415sq.m which will result in the school having a total floor area of 2693sq.m together with the retained, refurbished building.
- The proposals involve the demolition of the existing 1970's extension and the portacabin building currently occupying the site.
- Vehicular access to the site will be from the eastern end of the site via Halt Robin Road, here access will be provided to a 28-space car park located to the north of the site. Access from here will also be provided for servicing of the building, the sub-station, refuse storage, 3 accessible parking spaces and 20 cycle parking spaces.
- Pedestrian access will be provided by a new entrance from Halt Robin Road on the southern boundary. The main pedestrian entrance will be via the new single storey link between the new and retained buildings.
- To the north of the buildings are social and amenity areas for pupils and beyond this to the north of the retained building is a new multi use games area with floodlighting



(Figure 4.1: Proposed Site Plan)

5 PLANNING POLICY ASSESSMENT

5.1 This section sets out the planning policy context for the proposed development. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise. The key local policy documents that comprise the development plan in this case include:

- Bexley Core Strategy (2012)
- Bexley Unitary Development Plan (UDP) (2004, saved policies from 2012)
- Joint Waste Development Plan – Adopted February 2012.

5.2 At the regional level the New London Plan (2021) is relevant.

5.3 In addition, national planning policy set out in the following documents are also a material consideration that should be taken into account:

- National Planning Policy Framework ('NPPF', 2019).
- National Planning Practice Guidance ('NPPG'), (updated 2018).
- Department for Communities and Local Government ('DCLG') Policy Statement – Planning for Schools Development (M Gove and E Pickles, August 2011).

Bexley Local Plan

Unitary Development Plan 2004 (Saved Policies)

5.4 The UDP Proposals Map shows the site designated as 'Educational Buildings and Playing Fields', subject to the following policies:

- Policy G27: General Strategy open land including water, trees and woodland
- Policy ENV20: Environment – educational buildings and playing fields
- Policy COM1: Community Services – primary and secondary school provision
- Policy COM2: Community Services – educational buildings and playing fields

5.5 Policy G27 outlines the Council's intention to avoid the loss of any public or privately owned open land, including water, trees and woodland that: 1) fulfils a recreational, amenity or nature conservation function, 2) is capable of satisfying an identifiable need for a suitable alternative use that would retain the generally open or wooded appearance of the land; or 3) is otherwise an important visual amenity to the area.

5.6 Policy ENV20 relates to the future use of land designated as educational buildings and playing fields on the Proposals Map that may become operationally surplus and provides a criteria based approach to the assessment of any such proposal.

5.7 Policy COM1 seeks to ensure that adequate primary and secondary school facilities are available in Bexley according to need and changing demands.

5.8 Policy COM2 presumes in favour of retaining land designated on the Proposals Map in educational use where there is a recognized need for the facility in the area. In the event of

the land becoming surplus to educational requirements, the criteria set out in Policy ENV20 will be applied to any proposal for an alternative use.

5.9 The following general management policies will also be material to an assessment of the application proposal:

- Policy G1: Quality of environment and economy
- Policy G2: Infrastructure
- Policy G4: Social inclusion
- Policy G5: Considerate design (for the less agile)
- Policy G7: Development standards
- Policy G8: Flood risks
- Policy G15: Areas for primarily residential use 13
- Policy G16: Road traffic reduction
- Policy G17: Sustainable transport
- Policy G23: Off-street parking
- Policy G34: Pollution, hazardous substances and energy efficiency
- Policy G36: Departures from the Plan
- Policy ENV25: Sites of Local Importance for Nature Conservation
- Policy ENV39: Built environment – criteria for development
- Policy ENV40: Contamination and remedial treatment of land
- Policy ENV42: Provision for the needs of people with disabilities
- Policy ENV59: Energy efficiency
- Policy ENV60: Crime prevention
- Policy T6: Optimising use of the existing transport network
- Policy T16: Improvements to pedestrian safety
- Policy T17: Parking (off-street parking spaces)

5.10 Policy G1 outlines the Council's intention to protect, maintain and improve the quality of the built and natural environment for the economic and social wellbeing of the borough while making efficient and effective use of land

5.11 Policy G2 advises that development will not normally be permitted unless the infrastructure requirements of the development can be met or standards of services can be maintained without unacceptable cost to the Council or other statutory bodies or to the environment.

5.12 Policy G4 outlines the Council's intention, within available resources, to provide adequate means and opportunities for all sections of the borough's population to have access to housing, jobs, leisure, social and community facilities.

5.13 Policy G5 advises that the Council will have full regard to the needs of the disabled and less agile in decision-making.

5.14 Policy G7 outlines the Council's design expectations from all new development. Proposals will be required to: 1. Meet high standards of design, construction and layout; 2. Make adequate provision for vehicle parking; 3. Have regard for safety; 4. Incorporate open space where appropriate; and 5. Relate sympathetically to and be in scale with the existing built and natural environment.

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- 5.15 Policy G8 advises that development, including the raising of the level of the land, will not be acceptable where it would be at direct risk of flooding or likely to create or increase the risk of flooding elsewhere or likely to affect adversely the quality of underground or surface water.
- 5.16 Policy G15 outlines the Council's intention to protect or enhance the character and amenities of residential areas and where, appropriate, seek to encourage the environment of such areas.
- 5.17 Policy G16 outlines the Council's support for the principle of containing road traffic growth in the borough and reducing road traffic growth in the longer term.
- 5.18 Policy G17 seeks to promote the use of more sustainable transport choices and reduce the need to travel, especially by car, through the implementation of a variety of preventative measures.
- 5.19 Policy G23 outlines the Council's intention to coordinate the provision of on and off-street parking in the borough, including through the location of development, to promote sustainable transport choices and enhance environmental quality and amenity.
- 5.20 Policy G34 explains how development proposals will be assessed according to the matters of pollution and energy efficiency with an expectation that there should be no unacceptable impact to air, ground or surface water pollution, excessive noise or the contamination of land.
- 5.21 Policy G36 advises that any development proposal that would 'substantially conflict with or prejudice' the implementation of the policies and proposals of the plan will be resisted.
- 5.22 Policy ENV25 outlines the Council's expectation that trees of amenity, nature or landscape conservation value should be protected and retained, or else replaced with new tree and hedge planting as an integral element of any proposed landscaping scheme.
- 5.23 Policy ENV39 explains how the Council will seek to protect and enhance the quality of the built environment. In this respect, developments should be satisfactorily located and be of a high standard of design and layout. Proposals should be compatible with the character of the surrounding area, appropriately landscaped, have no unreasonable effect on the amenity of the surrounding area, make adequate provision for vehicle parking in accordance with the Council's parking standards, take due account of the need to deter crime and take into account any important local and strategic views.
- 5.24 Policy ENV40 requires applicants (in accordance with Policies G34 and ENV39) to take appropriate measures to survey sites that are known or suspected to be contaminated as a means of determining the need or otherwise for site remediation to prevent any human health risk.
- 5.25 Policy ENV42 requires all development proposals to make adequate provision for the needs of people with disabilities having regard to the Council's design guidelines relating to considerate design for the less agile.
- 5.26 Policy ENV59 seeks to encourage the improved energy efficiency of all new buildings, conversions and changes of use.

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- 5.27 Policy ENV60 advises that the Council will encourage improved security and crime prevention measures in new development.
- 5.28 Policy T6 explains how the Council will refuse any development proposals that would either cause local traffic flows to rise above the design flow for a road or would generate additional traffic on a road on which flows are already considered to exceed design flow. Exceptions will be considered according to whether any affected road is already earmarked for improvement or otherwise where there are no environmental, or other planning or road traffic objections to such highway improvements taking place.
- 5.29 Policy T16 outlines the Council's intention to improve pedestrian environments generally.
- 5.30 Policy T17 advises that all development will be expected to provide for off street parking spaces according to the Council's defined parking standards.

Bexley Core Strategy

- 5.31 The Core Strategy sets out a spatial planning framework for the borough until 2026 with a focus on promoting the principles of sustainable development. The following policies will also be material to the application proposal assessment:
- Policy CS01: Achieving sustainable development.
 - Policy CS08: Adapting to and mitigating the effects of climate change.
 - Policy CS09: Using Bexley's resources sustainably.
 - Policy CS16: Reducing the need to travel and the impact of travel.
 - Policy CS18: Biodiversity and geology
 - Policy CS21: Supporting community infrastructure and services.
- 5.32 Policy CS01 outlines the Council's intention to seek sustainable development (in line with the vision set out in Bexley's Sustainable Community Strategy) to create a 'strong, sustainable and cohesive community' in order to provide people with equal access to a better quality of life, protect the environment, promote the local economy and encourage an active and healthy lifestyle. All developers will be expected to apply the defined principles of sustainable development. These principles include the need to ensure that building height, mass and setting enhances the character of the surrounding locality and maximising the effective and efficient use of natural and physical resources.
- 5.33 Policy CS08 requires all development to contribute to the delivery of sustainable development by planning for, adapting to, and mitigating the impacts of climate change, by reducing the carbon emissions relating to the construction and operation of all development. National and London Plan policy principles will be applied, where appropriate, with all development expected to adopt sustainable design and construction techniques.
- 5.34 Policy CS09 advises that all new development which seeks to maximise the effective and efficient use of natural and physical resources, while contributing to the health and wellbeing of the community, will be encouraged.
- 5.35 Policy CS16 outlines the Council's intention to minimise the need for and distances people travel as a means of reinforcing the principles of sustainable development and to reduce the reliance on the private car.

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- 5.36 Policy CS18 explains how the Council will protect and enhance the biodiversity and geological assets of the borough.
- 5.37 Policy CS21 outlines the Council's intention to ensure the identification, development, completion, safeguarding and monitoring of infrastructure and services that are required to support housing and employment growth in the borough in order to maintain strong, cohesive and sustainable communities.

New London Plan (February 2021)

- 5.38 The Mayor of London formally adopted the 'New London Plan' in February 2021. The plan replaces the 2016 London Plan and forms part of the Development Plan for each of the London local planning authorities.
- 5.39 The following policies from the New London Plan (2021) are relevant to the Application Scheme:
- Policy GG1 Building strong and inclusive communities
 - Policy GG2 Making the best use of land
 - Policy GG3 Creating a healthy city
 - Policy D4 Delivering good design
 - Policy D5 Inclusive Design
 - Policy D12 Fire safety
 - Policy D13 Agent of Change
 - Policy G5 Urban Greening
 - Policy S1 Developing London's Social infrastructure
 - Policy S3 Education and childcare facilities
 - Policy SI1 Improving air quality
 - Policy SI2 Minimising greenhouse gas emissions
 - Policy SI13 Sustainable drainage
 - Policy SI17 Circular economy
 - Policy T1 Strategic approach to transport
 - Policy T4 Assessing and mitigating transport impacts
 - Policy T5 Cycling

National Planning Policy Framework

- 5.40 The NPPF was updated on 19th February 2019 by the Government and replaced the previous versions adopted in July 2018 and previous to that March 2012. The Policy Framework is considered fundamental to Government reforms to promote economic growth and make the planning system more accessible.
- 5.41 The NPPF sets out the Government's overarching economic, environmental and social planning policies in England and how these are expected to be applied. The NPPF does not change the statutory status of the Development Plan as the starting point for decision making however, it is a material consideration for local planning authorities in the determining of planning applications. Relevant policies include:

Educational Facilities

- 5.42 **Paragraph 94** states that “it is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities... should:
- 5.43 a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and
- 5.44 b) work with schools’ promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.

Design

- 5.45 **Paragraph 124** states that “the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.”
- 5.46 **Paragraph 127** states that “planning decisions should ensure that developments:
- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”

National Planning Practice Guidance

- 5.47 On the 6th March 2014, a Ministerial Statement was published announcing the launch of an online database of National Planning Policy Guidance (NPPG). The NPPG was subsequently updated to reflect the publication of the revised NPPF in July 2018. Whilst this practice

guidance is a material planning consideration, it is intended as guidance only and is therefore subservient to policies in the NPPF.

5.48 The detailed guidance within the NPPG has been taken into account within this Planning Statement.

Policy Statement – Planning for Schools Development

5.49 This policy statement published by the Department for Communities and Local Government in August 2011 confirms the Government’s commitment to ensuring there is sufficient provision to meet growing demand for state funded school places. It also confirms that state funded schools include Academies and free schools.

5.50 The statement goes onto to state that:

“There should be a presumption in favour of the development of state-funded schools, as expressed in the National Planning Policy Framework” and with regard to planning decisions Local authorities should give full and thorough consideration to the importance of enabling the development of state-funded schools”.

5.51 The statement sets out that the planning system should operate in a positive manner when dealing with proposals for the creation, expansion and alteration of state funded schools and that the following principles should apply:

- There should be a presumption in favour of development of state-funded schools, as expressed in the National Planning Policy Framework.
- Local Authorities should give full and thorough consideration to the importance of enabling the development of state funded schools in their planning decisions.
- Local authorities should make full use of their planning powers to support state-funded school applications.
- Local authorities should ensure that the process for submitting and determining state-funded school applications is as streamlined as possible.
- A refusal of any application for a state-funded school, or the imposition of conditions, will have to be clearly justified by the local planning authority.
- Appeals against any refusals of planning permission for state-funded schools should be treated as a priority.
- Where a local planning authority refuses planning permission for a state-funded school, the Secretary of State will consider carefully whether to recover for his own determination appeals against the refusal of planning permission.

Planning White Paper (August 2020)

5.52 The Planning White Paper ‘Planning for the Future’ proposes the overhaul of the current planning system to make it easier for the public to access, transform the way communities are

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shaped and build the homes the country needs. It is proposed that the current system will be replaced with a clearer rules-based system. The White Paper was subject of a first round of consultation that ended on the 29th October 2020.

6 CONSULTATION

- 6.1 The application is supported by a Statement of Community Engagement which sets out the strategy undertaken for pre-application community and stakeholder engagement.
- 6.2 The report demonstrates that the Design Team, has undertaken proactive pre-planning application discussions with relevant local stakeholders and the wider community in accordance with guidance in the National Planning Policy Framework (NPPF), legislation in the Localism Act, and Bexley Borough Council’s own consultation guidelines.
- 6.3 The report gives details of consultation activity undertaken prior to the planning application being submitted, as well as an overview of feedback received from stakeholders.

Pre-application discussions with London Borough of Bexley

- 6.4 The proposals subject of this application have been the subject of 2 formal pre-application meetings with Planning Officers of the London Borough of Bexley. The first was undertaken before Galliford Try were appointed to take the proposals forward by LSI Architects on behalf of Ivan Chavdarov, Project Manager for the London Borough of Bexley. This meeting was undertaken in February 2020 with a subsequent written response dated 5th March 2020. The first meeting was at an early stage of the project and covered first principles and at that stage detailed proposals had not been developed.
- 6.5 A second pre-application meeting undertaken by EdgePlan and Pozzoni Architects on behalf of Galliford Try was undertaken in March 2021 with a subsequent written response dated 15th April 2021. At this stage the scheme had been developed in some detail and consultation meetings and engagement with the school was being undertaken at the same time. The advice received helped shape the proposals and ensure both the needs of the school and the expectation of the Council’s Planning department were both taken into consideration in developing the detailed proposals.
- 6.6 The table below sets out a summary of the key conclusions from the second pre-application meeting and letter of advice with the Design Teams response:

Officer comments	Design Team response
The principle of the development is supported	Noted
To engage with Sport England regarding the loss of the playing field	Sport England (SE) were consulted and a response received 19/06/21. SE confirmed that they didn’t consider the application site to comprise playfield. The grassed area to the rear of the site has never been used for playing sports and comprises unmanaged scrub land.
A high-quality contemporary design will be the most appropriate design solution, with a brick or timber finish	The Design and Access Statement prepared by Pozzoni Architects provides a detailed analysis of the proposed scheme and how the principle of the design approach is a contemporary interpretation of the original school building using a scale that complements the existing building and using

	brick and detailing to reflect the order, rhythm and appearance of the retained buildings fenestration.
A flat or mono pitch roof would be most appropriate, and a green roof should be incorporated;	As advised the proposed extension has a flat roof to reduce its bulk and give it a simple, non-competing form. Green roof has been incorporated where feasible giving a total area of 67sq.m
If floodlighting is proposed, there will need to be limits on hours of operation; also need to account for impact on the ecology of the site, such as roosting bats;	Flood lighting is proposed to the muga, lighting will be controlled and have limited use. The design of the floodlighting will be done in consultation with the Project Ecologist. An Ecology Assessment is submitted in support of the application together with the results of extensive bat surveys.
A detailed Transport Statement is required;	A Transport Statement prepared by Cundall is submitted in support of the proposals together with a Car Park Management Plan and Travel Plan
Swept path drawings are required to demonstrate that access can accommodate the various sized vehicles;	Swept path drawings are included within the Transport Statement demonstrating that refuse vehicles and other vehicles can all access the site safely and turnaround and exit in a forward gear
Servicing within the site is required as it is not easy for vehicles to turn in Halt Robin Road;	
5% of parking provided should be designed for disabled with a further 5% of bays enlarged for future conversion to disabled parking if required;	A total of 31 parking spaces are proposed including 3 spaces designated for disabled parking which comprises 10%
Staff travel surveys required prior to Highways agreeing to car parking numbers;	Following the pre-app meeting additional survey work with the school has been undertaken and as a result the proposed parking has been reduced so only that required is provided
Provision needs to be made for the dropping off and picking up of pupils in cars, taxis or minibuses;	The school has confirmed that the needs of the pupils are not such that they need to be dropped off in a secure area. The proposed entrance is from Halt Robin Road where a previously blocked up entrance to the site is to be reinstated and improved. From here a ramped route will provide access to the new main entrance to the school. A secondary entrance for staff and visitors is provided to the east of the building. Vehicles dropping pupils off will be able to turn around at the bottom of Halt Robin Road to exit back towards Gladeswood Road and Lower Park Road

The site is adjacent to Franks Park, Site of Importance for Nature Conservation	This is noted and has been taken into consideration by the Ecology Assessment. The proposed development seeks to maximise the biodiversity within the site and will cause no adverse impacts beyond its boundaries
An Ecological Appraisal Survey Report and Protected Species Assessment is required Ecological enhancements are required;	Undertaken and submitted in support of these proposals. The Statement sets out a series of ecological and biodiversity enhancements that the development will seek to deliver
An Arboricultural Impact Assessment is required; any trees to be lost should be replaced;	An AIA is submitted in support of the application. A number of new trees are proposed within the open area to the rear of the site. Some loss of trees is required but this has been limited wherever possible.
An Air Quality Assessment is required – to achieve an air quality neutral appraisal of the development;	An Air Quality Assessment is submitted in support of the application this demonstrates that the proposed building is air quality neutral. In terms of vehicles the proposals are not air quality neutral but through mitigation measures intended to reduce the use of vehicles air quality impacts can be mitigated
A Contamination report is not required, but it is likely there will be a ‘watching brief’ planning condition;	Noted, however a Contamination Report was carried out for other purposes and is therefore submitted to the Council to provide comfort
Flood Risk Assessment is required. Sustainable Drainage scheme is required. The strategy should accompany the planning application;	Both documents are submitted in support of these proposals
BREEAM very good should be achieved, a detailed Energy Assessment is required;	BREEAM pre-assessments have been undertaken in respect of both the new build and the refurbishment of the existing building. In respect of the new building a BREEAM rating of 62.62%/Very Good is predicted. In respect of the refurbishment due to the constraints of the existing building a rating of 50.34%/Good is predicted

(Table 6.1: Summary of Officer Comments with Design Team response

6.7 The issues noted in the above table are expanded upon in the in Section 7 of this Statement.

Community Engagement **Key stakeholder consultation**

6.8 The Statement of Community Engagement notes that all key stakeholder groups likely to have an interest in the proposals were consulted, in order to ensure they were directly consulted ahead of a planning application being submitted. These included:

- Ward Councillors – Barnehurst Ward
 - Local residents
- 6.9 A direct mailing was sent to all local residents (642 mailings were sent out) in the immediate vicinity of the site advising them of forthcoming community consultation and providing a direct telephone number and email address for all queries relating to the emerging proposals.
- 6.10 The objective was to publicise the project website and the online Q&A events and to communicate information about the scheme and to encourage local residents and other stake holders to share their view on the proposals.
- 6.11 Two online Q&A events were held on Tuesday 27 April at 7pm and Wednesday 28 April at 1pm. Participants were able to register for any of the Q&A events in advance and submit any questions for the Design Team to answer live at the event.
- 6.12 Full details of the public consultation undertaken, and response received is set out within the Statement of Community Involvement prepared by Your Shout and submitted in support of the proposals.

7 KEY PLANNING CONSIDERATIONS

7.1 This application is for full planning permission for the refurbishment, remodelling and extension of the existing school buildings at the former Woodside School. The proposals are to bring the building and site up to modern standards to enable the creation of Cornerstone School a new 90 place SEND school for pupils with SEMH and ASD needs. The proposal utilises part of the former Woodside School site with its main frontage to Halt Robin Road.

7.2 The Key planning considerations in respect of the proposals are:

- Principle of development
- Design
- Residential Amenity
- Highways and Transport
- Flood Risk and Drainage
- Energy and Sustainability
- Arboricultural Impact
- Ecology and Biodiversity
- Landscaping
- Urban Greening Factor
- Air Quality
- Construction Management
- Fire Safety
- Ground Contamination
- Waste Reduction – Circular Economy

Principle of development

7.3 Responding to Government policy regarding education and school places, the NPPF guidance requires Local Planning Authorities to take a proactive, positive, and collaborative approach to meeting the needs for sufficient choice of school places in existing and new communities and to give “*great weight to the need to create, expand or alter schools*” (Paragraph 94).

7.4 New London Plan policy S3 confirms support for education facilities stating that ‘development proposals for education and childcare facilities should locate facilities in areas of identified need, in accessible locations with good public transport accessibility and access by walking and cycling’.

7.5 Bexley’s planning policy COM1 is committed to providing choice in education for parents and young people and seeks to ensure adequate primary and secondary facilities are provided within Bexley taking into account changing demands. COM2 seeks to retain in educational use land designated on the Proposals Map as school buildings and playing fields.

7.6 The proposed site, as confirmed in para 3.10 of this Statement is allocated for educational use and was until October 2017 occupied by Woodside School. It has since that time remained vacant and the opportunity now presents itself to bring the site back into use for educational purposes once more. The proposed use is therefore clearly in accordance with the allocated use of the site and subject to the detailed consideration of all matters the proposals are acceptable in principle.

Demand

- 7.7 Currently, Bexley provision for children with SEND is organised within 6 special schools and 21 specialist provisions (12 secondary) within mainstream settings for children who can access the national curriculum. The 12 secondary provisions cover the following areas of primary need: autism, speech language and communication, visual impairment and physical disability with 2 provisions being academically selective.
- 7.8 Bexley's provision of specialist places has increased in recent years, reflecting the growing need including a small capacity for complex needs within a secondary boys' school and the Cleeve Meadow Free School, which opened in September 2019, catering for children with MLD.
- 7.9 Bexley's strategy for SEN places, as set out in our SEN Strategy and SEN Education Commissioning Plan, has a clear aim that children should be educated in Bexley and their local community whenever possible to prevent children travelling out of borough. There remains a gap in local provision for children with complex needs (SEMH and high functioning ASD) resulting in children being placed out of borough. There are currently 109 young people placed in out of borough independent placements, of which 70 have a diagnosis of ASD (high functioning) and 20 have a primary need of SEMH. The proposals subject of this application will fill this gap to meet needs locally.

Summary

- 7.10 The proposals have been designed to respect the local area (as demonstrated in detail later in this Statement) and will be built to a highly sustainable standard and will offer an improved range of facilities for pupils and the wider community.
- 7.11 It is considered that the material considerations described above robustly support the continued educational use of the application site. The principle of development is further supported by the Government policy statement '*Planning for Schools Development*' which confirms a presumption in favour of state funded school development.

Design

- 7.12 The Government's commitment to design excellence is a key theme of the NPPF. High quality and inclusive design is seen to go beyond just aesthetic considerations, with plan-making and decision-making required to "*address connections between people and places and the integration of new development into the natural, built and historic environment*"
- 7.13 A key objective of both the New London Plan and Bexley policy is to promote high quality, sustainable design and exemplar development. This relates not just to the aesthetic appearance of the environment, but also about enabling an improved quality of life and economic growth. Policy also advises that development should reduce opportunities for anti-social behaviour and contribute to a sense of security.
- 7.14 In developing the design, the application site has been considered holistically with regard to the overall site strategy to improve the functioning of the school and making better and more efficient use of the available space.
- 7.15 The key design drivers for the development include:

- Design buildings that satisfy not only the School & DfE brief, budget & design standards but also respond sensitively to their context without copying the surrounding materiality & language like for like.
- Deliver a sustainable, contemporary building that is attractive to new students and responds specifically to their needs.
- Provide a building that is robust, using quality materials.

7.16 The scheme has evolved through consultation with various parties including the school community, the wider local community and London Borough of Bexley Planning and Highways Officers.

Siting, Scale and Massing

7.17 The development context is predominantly residential although the site itself sits in its own setting apart from the nearest residential properties to the east and west. The proposed extension has been sited to respond positively to the siting of the existing retained building and located as it is, it has no impact on the nearest neighbouring properties.

7.18 Due to the significant changes in levels across the site the siting of the extension has been pulled away from Halt Robin Road itself and is set at the lower level also common to the existing retained building. The extension is positioned to the west of the existing building and together with the retained build forms a strong frontage to Halt Robin Road.

7.19 In terms of scale the proposed extension is two storeys, the sports hall at the western end of the extension being a double height space with the remainder of the extension being two storeys with classroom spaces on the ground and first floor. The new and existing buildings are connected by a single storey link. The scale and mass of the extension approximately matches that of the existing building and separated by the single storey link ensures they sit comfortably together.

7.20 The generosity of the site ensures the extension is set well away from the site boundaries and the extension also sits comfortably within the site itself.

7.21 The proposals also include a series of small single storey extensions to the front of the retained building. These extensions provide a calm area for each classroom and are an essential requirement for the school. The regular siting of the extensions creates an attractive rhythm which with careful detailing and the use of a complimentary brick will comfortably relate to the existing building and adapt it for the specific needs of the pupils.

Appearance and Materials

7.22 The proposals use brick as the main material types which was considered to best respect the existing building and also incorporate the robust, low maintenance properties required by the school. The Design Team led by Pozzoni Architects undertook a number of elevational studies to explore potential materiality, aperture rhythm / pattern, materiality pattern / rhythm.

7.23 The proposed extension incorporates a buff brick with red brick detailing giving a vertical emphasis and rhythm to the elevation. The materials reflecting that of the retained building but used in a more contemporary way responding to the architecture of the new extension. The link building and the small single storey extensions both utilise a red brick to contrast with the predominate buff brick.

- 7.24 The windows and rainwater goods are to be in polyester coated aluminium with a grey finish and this will also be carried over to the replacement windows in the refurb building for consistency.
- 7.25 As demonstrated above the proposals represent the best and most efficient use of the existing site, ensuring the amenity of neighbouring occupiers are fully protected. The proposed building complements the existing character of the area in terms of siting, scale and appearance and specifically responds to the character and materiality of the host building. In this way the proposals fully comply with local planning policies and paragraphs 124 and 127 of the NPPF. Further details of the design rationale can be found within the Design and Access Statement.

Residential Amenity

- 7.26 **Privacy** – the siting of the proposed building ensures a generous separation distance is retained between the proposed building and the nearest residential properties. To the east the nearest property is some 80m away from the proposed extension and to the west 50m away. The proposed extension is not considered therefore to cause any adverse impacts in relation to privacy issues or overshadowing.
- 7.27 **Noise** – The building and site layout have been designed to mitigate potential noise impacts on the nearest residential properties. Although windows are openable, in normal circumstances they would not be opened as the building is proposed to be mechanically ventilated. Standard doubled glazed windows within good quality frames will achieve appropriate sounds reduction to ensure there is no impact on existing residents.
- 7.28 In terms of noise from plant it is confirmed that the plant will operate with noise levels below existing background noise levels and is envisaged to be controlled via a planning condition.
- 7.29 A Noise Impact Assessment is submitted in support of the proposed application, and this specifically considers the impact of the use of the proposed Multi Use Games Area (MUGA) on the amenity currently enjoyed by neighbours.
- 7.30 The pitch will be floodlit and it is proposed to be used by the community until 21:00 hours up to seven days a week. The pitch is proposed to be located to the northeast of the school site on the location of an existing games court of the former Woodside School. The nearest noise sensitive residential properties are directly to the East of the pitch on Metheun Road.
- 7.31 The assessment considered that the noise created by the use of the MUGA could potentially be noticeable but not intrusive and would result in ‘no observed adverse effect’. The assessment concludes that noise from the MUGA may be noticeable but not intrusive as defined by the ‘No Observed Adverse Effect’ level of the NPPG. This falls below the ‘lowest observed adverse effect level’ of the NPPG: Noise and therefore complies with the aims of the Noise Policy Statement for England (NPSE) requirements.
- 7.32 The use of the MUGA will be monitored by the school to ensure its use doesn’t become an issue for its neighbours and will look to work with the community to address any concerns that do arise.

Proposal: Refurbishment, remodelling and extension of existing school buildings
Site: Former Woodside School, Halt Robin Road, Belvedere, DA17 6DH

7.33 The proposals are demonstrated to have an acceptable impact on residential amenity and therefore comply with Saved UDP policy ENV39 that seeks to ensure developments 'have no unreasonable effect on the amenity of the surrounding area'.

Transport and Highways

7.34 A Transport Statement, Travel Plan and Car Park Management Plan have been prepared by Cundall and are submitted in support of the application.

7.35 A summary of the findings of the Transport Assessment are outlined below:

- A comprehensive network of pedestrian facilities is provided within the immediate vicinity of the site, with lit footways also provided on most local streets. While the site is situated in a PTAL of 2 rating, 8 bus stops and one rail station are provided within a 640m distance (10 minutes' walk) from the site;
- The surrounding area has only had one accident in the past 5 years identified and therefore the immediate transport network is considered safe and would be suitable for commuting via active travel;
- Following review of the only accident occurred in the study area over the assessed 5-years period, no obvious trends were found and the accident was determined to be as a result of road users' behaviour rather than any highway network design issues;
- The proposals include the provision of an on-site car park providing 28 car parking spaces for staff, 2 disabled parking bays and 1 enlarged parking bay. 6 of these car parking bays will be equipped with active charging facilities and 3 will have passive charging facilities for future provision. Cornerstone School's parking facilities are in accordance with the London Plan and pre-application discussion with LBB council.
- The proposal also includes 18 long stay covered and secured cycle parking spaces (12 for students and 6 for staff) plus 2 short stay cycle parking spaces for visitors, which is in excess of the London Plan's standards;
- Students drop off/pick up activities are proposed to be undertaken on street, from Halt Robin Road. It is proposed that cars/taxis/minibuses will park on the northern side of the road, from where they will perform drop off/pick up activities. It is also proposed that all vehicles will use the area at the eastern end of Halt Robin Road to perform turning manoeuvres;
- Waste and refuse collection will take place onsite, with deliveries will take place within the turning place outside of the vehicle access of the site;
- The peak hour period for persons trips is between 08:00-09:00, which is anticipated to generate a total of 91 persons trips (combined staff and students' trips). The peak hour period for vehicle trips is between 16:00-17:00, which is anticipated to generate a total of 31 one-way trip and 6 two-way trips;
- The assessment of the on-site parking capacity has determined that all staff parking generated by the school will be accommodated within the proposed on-site car park. Similarly, the anticipated off-site parking levels generated by drop-off/pick-up activities will be accommodated within the 120m section of Robin Halt Road;
- A School TP and a CPMP have been developed as mitigation measures towards reducing reliance of vehicle modes to and from the school by staff and students and for the sue of

the car park to be monitored to allow for further electric charging points or disabled bays where required.

7.36 In conclusion, the Transport Assessment states that that the proposed development would not have a materially negative impact on the operation of the local highway network or public transport services. Consequently, it is considered that planning consent should not be withheld on highway or transportation grounds and the proposals comply with the requirements of saved UDP policies G16, G17 and G23 and London Plan policies T1, T4 and T5.

Flood Risk and Drainage

Flood Risk

- 7.37 The submitted Flood Risk Assessment (FRA), prepared by AKS Ward, confirms the site to be within Flood Zone 1, and is predominantly brownfield previously developed land with a part greenfield area located in the north of the site.
- 7.38 The flood risk posed by other potential sources (i.e. surface water, groundwater and infrastructure failure) has also been assessed as low or negligible.
- 7.39 Given the low risk of flooding identified to be posed to the site, no specific flood resistance or resilience measures are considered necessary. It is however recommended within the report, as a matter of course, that the proposed ground-floor finished floor level be elevated above immediately adjacent ground levels, with the gradient of immediately adjacent areas designed and constructed so as to fall away from the proposed building, so as to provide the proposed building additional protection against any 'residual' flood risks. It is noted that the currently proposed building design adopts such a design approach.
- 7.40 It has also been demonstrated that a means of safe access and egress is demonstrable from the site, and that the proposed development is not considered to increase flood risk within the catchment through a loss of floodplain storage.
- 7.41 This FRA demonstrates that, in respect of flood risk, the proposed construction of a new teaching block at the site:
- Is suitable in the location proposed due to the low risk of fluvial flooding
 - The existing site has never flooded
 - The proposed flow rate off site is 2.9 litres/sec from a single sewer outlet.
 - The proposed development will not increase the risk of flooding either on or off site
 - The proposed development will utilise SuDS drainage techniques for the surface water discharge reducing the flow and volume of water off the site which will reduce flood risk and improve water quality.
 - The proposed development will utilise SuDS drainage techniques for the surface water drainage
- 7.42 On this basis, it is concluded that the proposals meet the flood risk requirements of the NPPF and local planning policy.

Drainage

- 7.43 The application is supported by a Drainage Strategy and Water Quality Report, prepared by AKS Ward. The report concludes that the foul and surface water drainage strategy has been designed in accordance with both national and local standards and best practice.
- 7.44 The foul and surface water drainage systems for the new development will be designed to accommodate the required flows for the lifetime of the development.
- 7.45 The Surface Water for the entire site (both new and existing buildings) will be collected under gravity, making use of existing drainage where practically possible, prior to being attenuated in a cellular storage tank below the new proposed car park to the north of existing school buildings. Offsite flow via a single outlet will be controlled by a HydroBrake flow control device prior to connection to the Thames Water Public sewer in Halt Robin Lane.
- 7.46 The proposed surface water discharge rate will be restricted to 2.9l/s (greenfield runoff rate). Attenuation will be provided in the form of gravel collection trenches, permeable tanked hardstanding areas to MUGA and carpark, a below ground cellular attenuation tank and a vortex flow control device reducing the flow rate into the surface water public sewer drainage system.
- 7.47 Ownership and maintenance liabilities for the foul and surface water drainage system will be clearly defined so that in the event of failure the drainage system appropriate action can be taken to ensure that the drainage system continues to work efficiently.
- 7.48 In the event that flows from rainfall exceed the 1 in 100-year rainfall event or system failure through lack of maintenance, surface water run-off will drain towards the north of the site following the existing flood path.
- 7.49 The Drainage Strategy is supported by the completed London Sustainable Drainage Proforma for Bexley confirming that the proposed Drainage Strategy complies with New London Plan policy SI 13.

Energy and Sustainability

- 7.50 Reducing the energy consumption of buildings is a key policy consideration at all levels of planning policy. The New London Plan requires development to make the fullest contribution possible to reducing carbon emissions, in accordance with the following energy hierarchy:
- Be lean: use less energy
 - Be clean: supply energy efficiently
 - Be green: use renewable energy
- 7.51 The policy sets targets for both residential and non-residential buildings, expressed as minimum improvements over the Target Emission Rate (TER) outlined in the national Building Regulations. Non-domestic buildings are expected to be carbon free from 2019. Carbon reductions targets should be met on-site where possible, and it is expected that at least 35% of carbon dioxide improvements over Part L 2013 should be made on site.
- 7.52 An Energy and Sustainability Statement prepared by Couch Perry Wilkes (CPW) supports this application. The report sets out how the proposed development will meet the energy targets required for planning, through energy efficient measures, low carbon energy supply from decentralised sources and the integration of renewable energy technologies.

- 7.53 The statement confirms that the scheme has been designed to respond positively to all national regional and local sustainability policy. The scheme will minimise any negative environmental impacts associated with energy, resource consumption, water, noise, air and light pollution.
- 7.54 After analysis of anticipated CO2 emissions under Building Regulations Part L2A using SBEM and having undergone a lean design process to reduce the demand for energy, this report has demonstrated that the proposed new extension can achieve a 46% reduction in carbon emissions over Part L 2013 Regulations resulting in a saving of 6 Tonnes of CO2 per annum for the building. A cash in-lieu carbon offset payment shall be made to achieve the net zero carbon as required within the London Plan.
- 7.55 In respect of the retained building that will be refurbished this has been modelled to ensure Building Regulations Part L2b compliance through consequential improvements, ensuring energy savings and carbon reduction in comparison to the existing building. In this way there is 33% improvements on the existing annual carbon emissions for the refurbished building.
- 7.56 The Energy and Sustainability Statement prepared by CPW demonstrates in detail how the proposed development complies with London Plan policy with a particular emphasis on the Energy Hierarchy for reducing carbon dioxide (CO2). The approach adopted is summarised in the following paragraphs.
- 7.57 **Be Lean – Use Less Energy** – the proposed building adopts an exemplar approach based on low energy design principles. This approach involves energy demand minimisation through effective building form and orientation, good envelope design and proficient use of services; such that the building itself is being used as the primary environmental modifier.
- 7.58 The orientation of the building, internal layout and configuration of rooms in addition to existing and proposed landscaping and the existing levels all assist with minimising over heating in the summer months and assisting the building to minimise heat losses and improving the likelihood of achieving air tightness.
- 7.59 Construction design standards will exceed Part L Building Regulations and will help minimise energy demand through passive and best practice measures therefore achieving reduced CO2 emissions. By creating a highly efficient building envelope heat loss in winter can be minimised as can unwanted heat gain in winter.
- 7.60 **Be Clean – Decentralised Energy** - Opportunities to connect the planned development to existing or future decentralised heat distribution networks, including those featuring Combined Heat and Power (CHP) plant, have been investigated with reference to the London Heat Map.
- 7.61 Investigations have been carried out into the viability of connections into a local district heating network. It was found that, currently, no local decentralised energy infrastructure was in place. The development will however include designated space for the future provision of the necessary heat exchange plant and incoming mains connections to future heat networks. No additional Be Clean measures are currently proposed.

- 7.62 **Be Green – Renewable and Low Carbon Technology** – CPW have undertaken a technical feasibility and economic viability of installing each LZC technology to assess those most suitable for the proposed development. The full assessment is set out in the submitted report.
- 7.63 The assessment concludes that the most viable LZC technology for the proposed development are Air Source Heat Pumps and Photovoltaic Panels.
- 7.64 **Air source heat pumps** are considered to be a renewable source of energy as they have a coefficient of performance within the range of 2.5-8, compared to that of a gas boiler c.0.98. They are primarily powered by electricity but use heat pump technology to collect heat that occurs naturally in the surrounding environment. Air source heat pumps are proposed to provide space heating to radiant panel systems and to provide domestic hot water.
- 7.65 **Solar Photovoltaic (PV) Panels** convert solar radiation into electrical energy. It is proposed to utilise PV's on the roof of the proposed extension the roof area can host approximately 150 1x1.6m panels which provides an annual yield of 21,534 kWh.
- 7.66 **Be Seen – Energy Monitoring** - The applicant commits to monitoring the development's energy performance post completion and reporting through an online monitoring portal as per recommendations of the London Plan.
- 7.67 The table below provides a summary of the energy strategy:

	Regulated non-domestic carbon dioxide savings	
	(Tonnes CO2 per annum)	(%)
Saving from energy demand reduction (Be Lean)	2	17%
Savings from heat network/CHP (Be Clean)	0	0%
Savings from renewable energy (Be Clean)	4	29%
Total Cumulative savings	6	46%

(Table 7.1 Energy Strategy Summary)

- 7.68 As seen above, in compliance with the 35% betterment on Part L 2013, which is required by the London Plan, the building surpasses this, providing a betterment of 46%. This also constitutes to a saving of 6 Tonnes of CO2 per annum for the building. A cash in-lieu carbon offset payment shall be made to achieve the net zero carbon as required within the London Plan.
- 7.69 To achieve net zero carbon, a cash in-lieu contribution is required which is anticipated to offset 7 Tonnes of CO2 per annum over 30 years which equates to £19,950 (£95/tonne).

Cooling and Overheating

- 7.70 The proposed scheme incorporates a number of measures to reduce the demand for cooling in accordance with London Plan policy S14, these include:

- Minimising internal heat gains – through insulating pipe work to minimise heat loss into the building. Locating the kitchen on an external façade to minimise internal heat gains
- Reduce solar gains largely achieved through the extensive tree coverage to the south providing shading which shall combat over heating
- Thermal mass incorporated through the floor slabs and roof
- Passive ventilation specified to reduce energy demand
- Mechanical ventilation with thermal heat recovery

7.71 Detailed overheating analysis is being undertaken to determine whether or not rooms will overheat during the summer. The areas have been thermally modelled to comply with CIBSE TM52 Overheating Criteria using CIBSE certified Level 5 approved Dynamic Simulation Modelling software.

7.72 The results of the analysis demonstrate that the selected rooms tested under the current DSY 1 weather scenario, are in full compliance with the perceived industry design standard stated above, with each room passing at least one criterion out of 3.

BREEAM

7.73 BREEAM or Building Research Establishment's Environmental Assessment Method is a voluntary scheme that aims to quantify and reduce the environmental burdens of buildings by rewarding those designs that take positive steps to minimise their environmental impacts.

7.74 Bexley Core Strategy policy CS08 seeks to maximise the proportion of new development achieving a BREEAM 'very good' rating. BREEAM awards credits for various aspect of a buildings design headed under the following categories:

- Management
- Health and Wellbeing
- Energy
- Transport
- Water
- Materials
- Waste

7.75 For this proposed development separate BREEAM Assessment will be undertaken for the new build and refurbishment parts of the proposed development.

7.76 To achieve a BREEAM rating of 'very good' the proposed development must achieve a score of 55% or more and 'excellent' rating would start at 70%. BREEAM pre-assessments have been undertaken Storma Built Environment and are submitted in support of this application.

7.77 In respect of the new build element of the scheme the pre-assessment indicates that a score of 62.62% is achievable which sits comfortably within the 'very good' rating as required. In respect of the refurbishment the pre-assessment indicates a score of 50.34% is achievable. The refurbishment scheme falls slightly short of the 55% required. Best endeavours will be made to improve this score but the constraints of the existing buildings and the nature of the works being undertaken result in this part of the proposals not quite achieving the required standard. Overall, however when taken as whole the proposed site achieves very high standards of sustainability as demonstrated by compliance with London Plan policies set out in the Sustainability and energy statement prepared by CPW.

Arboriculture

- 7.78 The application is supported by an Arboricultural Survey and associated supporting drawings. The report identifies that the development proposals will require the removal of 13 individual trees and 1 self-seeded group of trees.
- 7.79 Of these trees 8 are categorised as C1, 2 are categorised as B2 and 1 is categorised as U.
- 7.80 The majority of the tree losses are due to the trees being located within or very near to the footprint of the proposed building making it impossible for the tree to be retained, this accounts for 9 of the trees. A further tree has to be removed to allow for the ramp to be built. 3 further trees are located very close to the existing building and are either in poor condition or adversely affect the existing building due to proximity and overshadowing.
- 7.81 The loss of the trees is regrettable but unavoidable in order to make the best and most efficient use of the site. Overall, the site retains a large number of trees particularly along the southern and northern boundaries and therefore the impact to visual public amenity is limited.
- 7.82 The landscaping scheme which includes 23 replacement trees includes an area of dedicated tree planting adjacent to the proposed car park that will link with the established belt of trees along the northern boundary. The landscape scheme will also include 10 trees visible from the public realm, these trees will contribute to the existing group of trees along the southern boundary enhancing this wooded area which then leads into Frank Park on the opposite side of Halt Robin Road. In this way the proposals positively contribute to the tree cover across the site which in turn positively contributes to the adjacent site of borough importance for nature conservation.

Ecology

- 7.83 An Ecological Impact Assessment, prepared by Bakerwell is submitted in support of the proposals. The report details ecological survey work that has been undertaken particularly in regard to bats and sets out detailed mitigation and enhancements which will be included as part of the development proposals.
- 7.84 The ecological survey work undertaken by Bakerwell has included a Preliminary Ecological Appraisal and subsequent bat and reptile surveys.
- 7.85 Habitat suitable for reptiles was noted in the northern field on site (Bakerwell, 2020). No reptiles however were found during eight survey visits conducted 21 June – 9 September 2020, and therefore reptiles are likely absent from the proposed development site.
- 7.86 Three dusk bat surveys were conducted of the existing buildings on the site due to the identification of potential roost features on the buildings. As a result of surveys soprano pipistrelles were seen to emerge from the northern and western aspects of building B1b. Further emergences were noted from roof level, it was therefore confirmed at this stage that the building was a bat roost. Therefore, a Natural England (NE) European Protected Species Mitigation Licence (EPSML) is required prior to commencement of works to B1a and B1b.

- 7.87 Following, and subject to, the grant of the NE EPSML, mitigation measures will be provided to ensure no loss of favourable conservation status to the population of bats on site, including the soft strip under ecological supervision of any features of B1a or B1b which may be used by roosting bats, and provision of replacement roost opportunities.
- 7.88 The Bakerwell report confirms that providing the measures set out in this report and any subsequent measures required by Natural England are followed the development will be compliant with all legislation pertaining to bats and will deliver enhancements for biodiversity in line with the National Planning Policy Framework (NPPF).
- 7.89 In order to comply with the NPPF and policy within the London Plan and Bexley's own policy a number of mitigation measures are proposed to be adopted to enhance biodiversity across the site, these include:
- Some tree loss is required to facilitate the proposed development where this is unavoidable replacement tree planting is proposed. All new trees will be at least 2m in height at the time of planting and will comprise native species only
 - The western perimeter of the proposed car park is to be planted with a native wildflower meadow mix interspersed with native trees
 - In respect of bats to mitigate the loss or damage to the roost positions, prior to any works commencing, five bat boxes will be erected on the building (as close to the pipistrelle roost location as possible). All other works affecting the roost will be carried out under the necessary licenses and undertaken by trained professionals.
 - The new extension will incorporate bat boxes and bat bricks to provide replacement roost opportunities – please see the Ecological Assessment
 - In respect of birds hedge and tree removal and pruning will avoid the bird nesting season, March to August inclusive or if this is not possible under strict supervision of a suitably qualified ecologist
 - In respect of hedgehogs precautionary measures are required to ensure they are not trapped in trenches or holes and to avoid nesting areas. Precautions should be taken to ensure hedgehogs are able to escape holes if they do fall and are not trapped by temporary fencing or other obstructions
- 7.90 The proposals also include a range of enhancement measures to enhance biodiversity around the site to achieve the aims of the NPPF and corresponding policy on the London Plan. These measures include:
- Habitats**
- 7.91 The landscaping proposals will include native fruit or nectar bearing plants and trees to benefit foraging and refuge opportunities for wildlife including bats, birds, small mammals, and invertebrates.
- 7.92 The proposed development offers the potential to contribute to the black poplar Action Plan by planting new trees of this species in suitable available space within the red line boundary.
- 7.93 The national and regional planning policies require the enhancement of natural habitats. The proposed recommissioning of the school provides an opportunity to incorporate CS18(f) by “enabling environmental education opportunities at the borough's schools”, given the nearby Franks Park and the presence of habitats on site which could be enhanced to provide habitat for biodiversity and provide opportunities for environmental education at the school.

Outdoor Teaching Space

- 7.94 An improved outdoor teaching space will be provided to replace the existing pond and nature garden. The inclusion of native and ornamental shrub planting, tree planting, raised flower beds and species enhancements such as an invertebrate box and bird box will allow a natural immersive space to the outdoor teaching area and serve a greater purpose than the existing space. The pond is currently fenced off due to health and safety reasons. The pond liner is torn and no longer holds water, therefore it does not function as a good quality wildlife feature and will be improved by this proposal.
- 7.95 The landscaping proposals including an area of green roof will include native planting of fruit or nectar-bearing plants and trees, to encourage a greater diversity of insects for bats to feed on. This will also provide increased opportunities for nesting and foraging birds.

Bats and Birds

- 7.96 Bat bricks and boxes will be incorporated in the building and existing trees as a further enhancement of the site for bats. In addition, a hibernation box will also be provided. Five bird nest bricks and boxes will be incorporated into the proposed development, at least 3m above ground level facing away from the prevailing winds. Indicative positions are shown in the Ecological Assessment.

Other Species

- 7.97 Two invertebrate boxes will be installed on site and two log piles will be created in sunny undisturbed locations around the site border.
- 7.98 The report concludes that the development can proceed with minimal impact to habitats and protected / notable species if the mitigation measures outlined above and any measures arising from the further surveys, are implemented. There is also the opportunity to enhance the development for local wildlife in the long-term by implementing the enhancement measures. The measures detailed are in line with Chapter 15 of the NPPF and offer the opportunity to enhance the site for biodiversity in accordance with the Bexley Local Plan and Biodiversity Action Plan.

Landscaping

- 7.99 The site currently comprises built form, with an area of rough grass/scrub land to the north of the site and a steeply sloped area with a number of trees to the south of the site. The northern boundary is also formed of a band of established trees. Within the main part of the site, it is formed predominantly of hard standing with interspersed trees.
- 7.100 The proposed landscape scheme has been developed to create a safe and secure environment for use by students, ensuring all areas are accessible regardless of mobility and responding safely to the changes in level across the site.
- 7.101 **Access** - To the front of the school from Halt Robin Road a new pedestrian entrance for pupils is proposed reinstating a point of entry that had previously been bricked up. From here a new ramp deals with the change of level between Halt Robin Road and the entrance to the school ensuring DDA compliant access.
- 7.102 The ramp lands in courtyard at the lower level that provide level access to the main pupil's entrance contained within the single storey link between the retained and new building. As

previously noted some trees on the bank will be lost to allow the creation of the ramp but these are proposed to be replaced with the planting of 10 new trees in this location.

- 7.103 The main access for staff and visitors will be via the eastern end of the site through the east facing elevation of the retained school building.
- 7.104 **Boundary Treatment** - The secure line to the site boundary will be a 2.5m weldmesh fence. The fence to the north of the new building will be clad with timber to restrict visual access to the existing woodhouse school site to the north. The existing retaining wall to the Southern edge along Halt Robin Road will be retained, with the existing railings removed and the new fence located on the pavement side of the retaining wall.
- 7.105 **Southern Play Space** - The area to the south of the new and existing building will be left as grass and tarmac play space. An additional external stair has been added to allow easy access to the hall for community use. An area of planting will be installed in the Southeast corner to tie in with the existing levels, with a grass area to the West of the new hall.
- 7.106 **Northern Play Space** - The northern play space offers an open hard play space, with a ramped and stepped access to the sports hall and the 'Link' entrance to the school from the north. To the Eastern end of the playground is an outdoor classroom with seating, bound gravel surface and raised growing beds, which is enclosed with a 1.5m fence. Running to the north and east of this space is a sloped access from the disabled parking adjacent to the MUGA leading to the access into the school. The existing retaining walls and steps to the West of the outdoor classroom are to be retained.
- 7.107 **Green roof** – provision of 67sq.m of green roof to contribute to the enhancement of biodiversity.
- 7.108 **MUGA** - The MUGA is to be formed to the North of the existing retained building with a stepped access to the Southwest corner with a second access to the Northeast corner. The MUGA will be porous tarmac with a 3m High sports fence surrounding it, with floodlighting.
- 7.109 **Soft Landscaping** - The proposed landscape masterplan aims to retain existing green infrastructure on site wherever possible, and enhance it for both amenity, ecological and environmental value. Soft landscaping will be further enhanced in the limited site area with pockets of mixed native shrub planting. This will not only add amenity value for site users during term time but provide wildlife and habitat value. The majority of trees across the rest of the site will also be retained except for those that need to be removed to accommodate the new building, or structures on the site, although many of these are in poor condition as confirmed in the Tree Survey report submitted in support of the application.
- 7.110 The planting proposals will serve to increase the biodiversity across the site and include the replacement planting of 23 trees across the site, providing a mix of four different types, including native species.
- 7.111 Wildlife friendly, robust shrubs and groundcover planting are also proposed. A species rich grass seed will also be selected which will contribute to biodiversity, whilst being able to be regularly mown to keep it a short and useable.

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7.112 Full details about the proposed landscaping are contained within the submitted Design and Access Statement and associated landscape drawing prepared by UBU Design.

Urban Greening

7.113 New London Plan policy G5 (Urban Greening) confirms that Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design. The policy recommends a target score of 0.4 for developments that are primarily residential and 0.3 for commercial development. No specific target is set for new schools.

7.114 Table 7.1 below using the score set out in table 8.2 in the New London Plan:

Surface Cover type	Factor	Area (sq.m)	Score
Semi natural vegetation	1	1486sq.m	1486
Intensive green roof	0.8	67sq.m	53.6
Standard trees in connected tree pits	0.8	46.8sq.m	39.04
Flower rich perennial planting	0.7	126sq.m	88.2
Groundcover planting	0.5	428sq.m	214
Permeable paving	0.1	3025sq.m	302.5
Total			2183.34
Site area			8500
Urban Greening factor Score			0.27

(Table 7.1 Urban Greening Score)

7.115 Working within the site constraints and taking account of the existing previously developed nature of the majority of the site, Urban Greening Opportunities have been maximised.

Air Quality

7.116 Stroma Built Environment Ltd have undertaken an Air Quality Assessment to support the planning application.

7.117 The submitted Stroma report provides a qualitative assessment of dust levels associated with the proposed development. The report concludes that, whilst the likely impact of dust soiling and PM10 are negligible mitigation measures are recommended and are applicable for a low to medium risk site.

7.118 Implementation of these Best Practice Measures will help reduce the impact of the construction activities. With these mitigation measures enforced, the likelihood of nuisance dust episodes occurring at those receptors adjacent to the development are considered low to negligible. Notwithstanding this, the report advises that the developer should take into account the potential impact of air quality and dust on occupational exposure standards (in order to minimise worker exposure) and breaches of air quality objectives that may occur outside the site boundary.

7.119 Monitoring is not recommended at this stage; however, continuous visual assessment of the site should be undertaken, and a complaints log maintained in order to determine the origin of a particular dust nuisance. Keeping an accurate and up to date complaints log will isolate

particular site activities to a nuisance dust episode and help prevent it from reoccurring in the future.

7.120 All predicted NO₂ and PM₁₀ concentrations at the modelled receptor locations are well below the air quality objective and the additional traffic is expected to have a negligible impact on existing receptors.

7.121 The Air Quality Neutral Building Assessment for the proposed development demonstrated that it is below the benchmark. As such, the development is considered air quality neutral in regard to building emissions and therefore no further mitigation is required.

7.122 The Air Quality Neutral Transport Assessment for the proposed development demonstrated that it is above the benchmark. As such the development is not considered air quality neutral in regards transport emissions without further mitigation measures. The proposed mitigation measures recommended below are all incorporated in the proposed scheme in order to address this matter and to ensure the development can be considered air quality neutral. The mitigation measures include:

- Installation of car charging points
- Bicycle storage
- Implementation of a travel Plan

7.123 The submitted Air Quality Assessment demonstrates subject to mitigation that the proposals are acceptable, and that permission should not be precluded on an air quality basis.

Construction and Environmental Management Plan

7.124 A Construction and Environmental Management Plan, prepared by Galliford Try, is submitted in support of the proposals. This document sets out the site control measures and strategies that will be employed to minimise the impacts of construction operations on traffic and the local environment.

7.125 The Construction Management Plan will be a 'live' document that will be monitored and reviewed throughout the duration of the project to ensure that it reflects the current site activities and hazards. The plan will be distributed to all key stakeholders and sub-contractors involved with the project, to ensure that the measures set out are always followed.

7.126 Galliford Try are members of the Considerate Constructors scheme and all site activities will be undertaken in accordance with best practice promoted by the scheme. A Communications Strategy will also be put in place to ensure Galliford try keep the local community fully informed of construction activity throughout the duration of the project.

Fire Statement

7.127 A Fire statement has been prepared by FDS Consult and is submitted in support of these proposals in accordance with New London Plan policy D12. The statement provides a detailed consideration of the proposed development in respect of the following key requirements:

- Fire appliance access;
- Fire assembly point locations;
- Measures to ensure the safe evacuation of the building and a robust evacuation strategy;
- Provision of access to suitable firefighting equipment;

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- Appropriate construction methods and materials; and
- Passive fire protection facilities.

7.128 Overall, the building will be designed to very high standards to ensure fire safety standards are incorporated throughout the building both during construction and operation. The Fire Statement establishes the principle of how the design is intended to comply with the relevant Building Regulations. The final detailed design will be detailed in a Fire Strategy Report that will be submitted for Building Regulations approval.

Ground Contamination

7.129 Both a Desk Study and Phase 2 Site Investigation have been under by Lustre Consulting in order to establish the contaminative status of the site and the ground conditions to determine suitable foundation design options.

7.130 Based on the findings of the survey the contaminative status of the site is not considered to be prohibitive to the proposed redevelopment as described by this statement. Certain mitigation measures are proposed to secure a safe environment for end users and these include:

- **Clean cover system** – to mitigate the risks from shallow soil contamination to end users in areas of proposed soft landscaping. The CSS will mitigate the identified risks by breaking the exposure pathways between any contaminated Made Ground and future end users. It will also mitigate against the risk identified to groundwater beneath the site by removing the source of contamination.
- **Waste disposal** - The layer of tarmac present across external areas of the site will likely require removal in order to facilitate the proposed development. Waste assessment of this material has confirmed that this material will require disposal as hazardous waste due to elevated concentrations of PAHs and benzo(a)pyrene.
- **Further investigation** - In the vicinity of the above ground storage tank and associated fuel transmission pipework: Investigation of this area of the site was outside the current scope of works, therefore prior to the redevelopment of the site.
- **Validation testing of soils** which could be potentially retained within 'outdoor classroom areas' or additional areas of soft landscaping: It is understood that there is the potential for proposed redevelopment to include 'outdoor learning spaces' which could comprise soft landscaping and open ground, as well as for further areas of soft landscaping to be included within the proposed layout.

7.131 Overall, the site poses minimal risks from contamination and any minor risk can be further mitigated by the above measures.

Waste Reduction – Circular Economy

7.132 Policy SI7 of the London Plan promotes the reduction of waste at all stage of the development process. The proposals subject of this application seeks to bring back into use a former educational building and in that way and though the retention and reuse of the existing buildings fully comply with the principles set out in policy SI7.

7.133 Construction Phase – there is very little waste resulting from demolition and any demolition waste that is created will be crushed and retained onsite form first the piling mat and then the base layer for any areas of hard standing in this way there will be minimal exploration of demolition waste.

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- 7.134 Only waste that is suspected of contamination as highlighted in paragraphs 7.129-7.131 will be removed from the site to enable it to be treated safely.
- 7.135 The existing temporary mobile classroom on site is structurally unsound and cannot be removed from site without it collapsing it will therefore be dismantled on site materials separated and re-cycled where possible.
- 7.136 During the construction phases of the development procedures will be implemented to ensure minimal wastage of materials. Where materials are damaged and become unusable for whatever reason they will be recycled.
- 7.137 All staff welfare facilities will include separated waste collection to ensure all waste is collected for recycling as required.
- 7.138 During the operational phase of the development very little waste is expected to be generated on a daily/weekly basis. All waste collection points around the school will allow for the separation of waste to enable the maximum amount to be recycled.
- 7.139 The proposed development due to the nature of its reuse is considered to comply with the aims of the Mayor policy and waste generation from both the construction and operational phases will be kept to a minimum through the implementation of robust procedures.

8 PLANNING BENEFITS OF THE PROPOSED DEVELOPMENT

8.1 In addition to the 'Planning Case for Development' described in detail in the previous section there are a number of other planning benefits associated with the proposed development that will benefit the local area:

8.2 Economic Benefits

- **Significant Investment** - the proposals represent a significant financial investment in support of the continued growth of the UK economy;
- **Local Economic Boost** – both during the construction and operation the spending power of constructions worker, teaching staff and parents will all support the local economy.
- **Local Employment** – The contractor will where possible seek to employ local people including through placements and apprenticeships;

8.3 Social/Community Benefits

- **Provision of Community facilities** – the school will be a community facility, meeting an identified need for SEMH provision. The new facilities will when possible be made available to be used by the local community.
- **Education** – Continued and expanded delivery of high-quality teaching in this part of Bexley ensuring the Borough can accommodate the requirement of all children and minimis ethe need of pupils to travel outside borough for their education.
- **High Quality Facilities** – the proposals are state of the art facilities purposefully designed and built for the specific needs of students ensuring the best education can be provided for the students;

8.4 Environmental Benefits

- **Design and Layout** - as outlined in the accompanying Design and Access Statement, the development will deliver a high quality internal and external environment using good quality materials to respond positively to the local environment;
- **Energy** – highly efficient building built to the highest sustainability standards.

9 CONCLUSION

- 9.1 This Planning Statement, prepared by EdgePlan, accompanies a detailed planning application commissioned by Galliford Try on behalf of the London Borough of Bexley for a new 90 pupil SEMH School with Sixth Form. This Planning Statement considers the planning policy framework and associated guidance and provides an analysis of this in relation to the Proposed Development at the Site, also taking account of feedback from pre-application consultation.
- 9.2 The re-use of these former school buildings and the regeneration and re-use for a new school represents sustainable development of the highest order and is therefore supported by policy within the NPPF, London Plan and Bexley's local planning policies.
- 9.3 The provision of new educational facilities on this site allocated for educational use and meeting an identified need for SEMH places within this part of the Borough is also considered to be in line with policy with regard to the provision of a new high quality education places.
- 9.4 The proposed extension has been designed to respect the architecture of the host building and the amenity of neighbouring residential occupiers and complement the character of the area in terms of bulk, scale and massing and proposes a robust and complimentary palette of materials.
- 9.5 The proposed development has been demonstrated to comply with all other planning policies and other material considerations including the relevant development plan and the NPPF. In all respects the proposals should be considered as sustainable development for which planning permission should be granted without delay.