

PLANNING APPLICATIONS COMMITTEE

Wednesday, 14th September, 2016

10.00 am

**Council Chamber, Sessions House, County Hall,
Maidstone**



AGENDA

PLANNING APPLICATIONS COMMITTEE

Wednesday, 14th September, 2016, at 10.00 am Ask for: **Andrew Tait**
Council Chamber, Sessions House, County Hall, Maidstone Telephone: **03000 416749**

Tea/Coffee will be available from 9:30 outside the meeting room

Membership (19)

Conservative (10): Mr J A Davies (Chairman), Mr C P Smith (Vice-Chairman),
Mr M J Angell, Mr D L Brazier, Mr N J D Chard, Mr S C Manion,
Mr R J Parry, Mr C Simkins, Mrs P A V Stockell and
Mr J N Wedgbury

UKIP (4) Mr M Baldock, Mr L Burgess, Mr T L Shonk and Mr A Terry

Labour (3) Mrs P Brivio, Mr T A Maddison and Mrs E D Rowbotham

Liberal Democrat (1): Mr I S Chittenden

Independents (1) Mr P M Harman

UNRESTRICTED ITEMS

(During these items the meeting is likely to be open to the public)

A. COMMITTEE BUSINESS

1. Substitutes
 2. Declarations of Interests by Members in items on the Agenda for this meeting.
 3. Minutes - 13 July 2016 (Pages 5 - 12)
 4. Site Meetings and Other Meetings
 5. Dates of meetings in early 2017
- A5 Wednesday, 18 January 2017
Wednesday, 15 February 2017
Wednesday, 15 March 2017
Wednesday, 12 April 2017

B. GENERAL MATTERS

1. General Matters

C. MINERALS AND WASTE DISPOSAL APPLICATIONS

1. Application GR/15/1192 (KCC/GR/0387/2015) - Improvement and enhancement of existing waste transfer site by erection of a replacement building to provide covered working area and ancillary site improvements together with retrospective provision for trommel, picking station and wall at Unit 4, Apex Business Park, Queen's Farm Road, Shorne; R S Skips Ltd (Pages 13 - 50)

D. DEVELOPMENTS TO BE CARRIED OUT BY THE COUNTY COUNCIL

1. Proposal DA/16/00800/CPO (KCC/DA/0091/2016) - Relocation of existing temporary classroom to the front of the school from the rear at Wilmington Grammar School for Girls, Parsonage Lane, Wilmington; KCC Property and Infrastructure Support (Pages 51 - 86)
2. Proposal DA/16/00799 (KCC/DA/0088/2016) - Three temporary classrooms and associated access improvements to accommodate the 2016/17 allocation of pupils at Wilmington Academy, Common Lane, Wilmington ; KCC Property and Infrastructure Support (Pages 87 - 136)
3. Proposal SE/16/1480 (KCC/SE/0047/2016) -Expansion of school from 2FE to 3FE at Hextable Primary School, Rowhill Road, Hextable; KCC Property and Infrastructure Support (Pages 137 - 160)

E. COUNTY MATTERS DEALT WITH UNDER DELEGATED POWERS

1. County matter applications (Pages 161 - 168)
2. County Council developments
3. Screening opinions under Town and Country Planning (Environmental Impact Assessment) Regulations 2011
4. Scoping opinions under Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (None)

F. OTHER ITEMS WHICH THE CHAIRMAN DECIDES ARE URGENT

EXEMPT ITEMS

(At the time of preparing the agenda there were no exempt items. During any such items which may arise the meeting is likely NOT to be open to the public)

Peter Sass
Head of Democratic Services
03000 416647

Tuesday, 6 September 2016

(Please note that the background documents referred to in the accompanying papers may be inspected by arrangement with the Departments responsible for preparing the report. Draft conditions concerning applications being recommended for permission, reported in sections C and D, are available to Members in the Members' Lounge.)

KENT COUNTY COUNCIL

PLANNING APPLICATIONS COMMITTEE

MINUTES of a meeting of the Planning Applications Committee held in the Council Chamber, Sessions House, County Hall, Maidstone on Wednesday, 13 July 2016.

PRESENT: Mr J A Davies (Chairman), Mr C P Smith (Vice-Chairman), Mr M J Angell, Mr M Baldock, Mr D L Brazier, Mrs P Brivio, Mr L Burgess, Mr N J D Chard, Mr I S Chittenden, Mr P M Harman, Mr T A Maddison, Mr S C Manion, Mr R J Parry, Mr T L Shonk, Mr C Simkins, Mrs P A V Stockell, Mr A Terry and Mr J N Wedgbury

ALSO PRESENT: Mr R H Bird and Mr P J Homewood

IN ATTENDANCE: Mrs S Thompson (Head of Planning Applications Group), Mr M Clifton (Principal Planning Officer - Waste Developments), Mr J Crossley (Principal Planning Officer - County Council Development), Mr D Joyner (Transport & Safety Policy Manager), Mr D Munn (PROW Area Manager - West Kent) and Mr A Tait (Democratic Services Officer)

UNRESTRICTED ITEMS

28. Membership
(Item A1)

The Committee noted the appointment of Mr D L Brazier in place of Mr T Gates.

29. Minutes - 18 May 2016
(Item A4)

RESOLVED that the Minutes of the meeting held on 18 May 2016 are correctly recorded and that they be signed by the Chairman.

30. Application TM/15/1636 (KCC/TM/0141/2015) - Section 73 application to revise the existing working, landscaping and restoration scheme pursuant to Condition 19 of Permission TM/98/1815 including permanent re-routeing of track (and public right of way) at Nepicar Sand Quarry, Maidstone Road, Wrotham Heath; J Clubb Ltd
(Item C1)

(1) The Committee agreed to the deletion of the “maintain 75% silica sand sales” condition on the recommendation of the Head of Planning Applications Group.

(2) In agreeing the recommendations of the Head of Planning Applications Group, the Committee strengthened the new condition by specifying that the

footpath would be formally diverted before extraction began within phase 3 of the quarrying operations (see 3 (b) below). It also strengthened the Informative on the rain shelter in 3 (c) (i) below as well as including an additional Informative as set out in (3) (c) (ii) below.

(3) RESOLVED that permission be granted to the application subject to:-

- (a) the re-imposition of conditions previously imposed on permission TM/98/1815 (updated and amended as necessary) including conditions covering the development being carried out in accordance with the approved details; the only access to be used by traffic entering or leaving the site being the existing quarry access from the A25; no excavation taking place within 30 metres of the boundary of the M26; the safeguarding of visibility splays; measures to prevent mud and debris on the public highway; the sheeting of loaded vehicles; maintenance of the access road surface; signs indicating left turn only onto the A25; a restriction on average weekly traffic flows from Nepicar (and Park Farm Quarry); no excavation taking place within 30 metres of Askew Bridge Cottages; no extraction taking place below 65 metres AOD; no materials being imported for processing, storage or distribution; the retention of soils and overburden on site; appropriate handling of soils; appropriate treatment of stockpiles which will be no more than 5 metres in height; the submission of an alternative restoration scheme in the event of cessation of working prior to completion; the retention of trees and shrubs for 5 years; no importation except for topsoil and subsoil; aftercare; operating hours being 0700 to 1800 hours on Mondays to Fridays, essential maintenance only from 0700 to 1300 hours on Saturdays, with no operations on Sundays, Bank or Public Holidays; a scheme of Woodland and Wildlife Habitat Aftercare being implemented; the removal of permitted development rights to erect, extend, install or replace fixed plant, machinery, buildings, structures, erections unless agreed in writing by the Mineral Planning Authority; the display of the planning permission; the replacement control of noise condition suggested by the noise advisor; proper maintenance of vehicles, plant and machinery; control of dust; the removal of all buildings, machinery, foundations and bases and the restoration of the site; measures to prevent fly tipping; monitoring of groundwater; safe storage of oils and chemicals; and the keeping of silica sand sale records;
- (b) new conditions, including conditions covering progressive working, landscaping and restoration in accordance with the submitted plans; prior to the commencement of extraction within phase 3 of the quarrying operations, PROW MER248 and the access road serving Nepicar Meadow Cottage and The Chalet shall have been formally diverted; details of the specification of the diverted route including passing places and which address matters of safety shall be submitted to the Mineral Planning Authority for approval and thereafter be implemented as approved; and the additional

ecological measures identified in the Corylus Ecology Report of January 2016 being carried out; and;

- (c) the applicants being advised by Informative that:-
 - (i) they should supply exact details of the proposed rain shelter prior to it being brought onto the site in order that the County Council can conclude on the need for permission or prior approval (or otherwise); and
 - (ii) they should submit at an early stage a completed application to secure the formal diversion of PROW MR248 in order to avoid any potential delay to phase 3 of the quarrying operations.

31. Proposal TM/16/00853/CR3 (KCC/TM/0031/2016) - New 2 form entry primary school , car park, playground and playing fields at Land adjacent to Hall Road, Wouldham; KCC Property and Infrastructure Support
(Item D1)

(1) Mr P J Homewood was present for this item pursuant to Committee Procedure Rule 2.27 and spoke.

(2) Mrs G Goode (Wouldham PC) addressed the Committee. Mr G Meeds (KCC Property and Infrastructure Support) spoke in reply as the applicant.

(3) In agreeing the recommendations of the Head of Planning Applications Group the Committee strengthened the Informative set out in (4) (b) (viii) below and added an Informative strongly encouraging the School to explore the potential for pre-school provision.

(4) RESOLVED that:-

- (a) permission be granted to the proposal subject to conditions, including conditions covering the standard 5 year time limit; the development being carried out in accordance with the permitted details; the submission and approval of details of all construction materials to be used externally; hours of working during construction being restricted to between the hours of 0800 and 1800 on Mondays to Fridays and between the hours of 0900 and 1300 on Saturdays with no operations on Sundays or Bank Holidays; the submission of a Construction Management Plan providing details of the routing of construction and delivery vehicles to and from the site; the location of parking and turning areas for construction and delivery vehicles, site personnel and visitors; the provision of wheel washing facilities, temporary traffic management and signage; the ecological enhancements recommended in the Ecological Appraisal being implemented through the landscape scheme; the site being cleared outside of the breeding bird season; the submission of details of vegetation clearance in order to provide a precautionary

approach in respect of Great Crested Newts; the submission of archaeological field evaluation works; no further development taking place if previously unidentified contamination is found on site until a remediation strategy has been found; no infiltration of surface water drainage into the site taking place without the written consent of the County Planning Authority; the means of foul and surface water sewerage disposal being agreed with the County Planning Authority in consultation with Southern Water; the provision of a raised zebra crossing prior to occupation of the school between the drop off zone and the school buildings in accordance with details to be submitted; the gates being open away from the highway and being set back a minimum of 5.5m from the edge of the carriageway; details of School Keep Clear parking restrictions and traffic signs being submitted, approved and provided prior to occupation of the school; the completion and maintenance of the access shown on the plans prior to the use of the site commencing; the provision and maintenance of the visibility splays, with no restrictions over 0.6m above carriageway level within the splays prior to the occupation of the school; the provision and permanent retention of the cycle parking facilities prior to the occupation of the school; the gradient of the access being no steeper than 1 in 10 for the first 1.5m from the highway boundary and no steeper than 1 in 8 thereafter; the provision and maintenance of 2m x 2m pedestrian visibility splays behind the footway on both sides of the access, with no obstruction over 0.6m above footway level, prior to the occupation of the school; the submission of a School Travel Plan within 3 months of the occupation of the school and its ongoing annual review for a period of 5 years; the submission of a fully detailed sustainable surface water drainage scheme for the site prior to commencement of development, together with the written approval of such a scheme and its on-going maintenance prior to occupation of the extension; and the submission of a native species landscape scheme that supports biodiversity together with details of a maintenance scheme for such landscaping to ensure the establishment of the planting and its management in order to benefit biodiversity; and

- (b) the applicants be advised by Informative that:-
- (i) they should register the School Travel Plan with Kent County Council through the “Jambusters” website;
 - (ii) they should ensure that all necessary highway approvals and consents are obtained;
 - (iii) the development should take account of the Bat Conservation Trust’s *Bats and Lighting in the UK* guidance;
 - (iv) they should be aware of the additional information provided by the Environment Agency regarding the drainage and waste to be taken off site;
 - (v) a wastewater grease trap should be provided on the kitchen waste pipe or drain;

- (vi) they are encouraged to implement a ventilation system for the removal and treatment of cooking odours;
- (vii) the school should encourage parents to switch off their engines if stationary to avoid pollution from idling engines;
- (viii) they are strongly encouraged to pursue the proposals for pedestrian and cycle routes from Wouldham to the new school with the Parish Council, including a pedestrian route across the recreation ground and a safe crossing of Knowle Road; and
- (ix) the School is strongly encouraged to explore the potential for pre-school provision.

32. Proposal 16/503410/COUNTY (KCC/MA/0084/2016) - Two storey extension to facilitate the expansion of the school from 1 FE to 2 FE at South Borough School, Stagshaw Close, Maidstone; KCC Property and Infrastructure Support
(Item D2)

(1) Mr R H Bird was present for this item pursuant to Committee Procedure Rule 2.27 and spoke.

(2) In agreeing the recommendations of the Head of Planning Applications Group, the Committee amended the School Travel Plan to ensure that it was reviewed annually. It also added an Informative to strongly encourage the applicants to explore the reopening of the Postley Road pedestrian access.

(3) RESOLVED that:-

- (a) permission be granted to the proposal subject to conditions, including conditions covering the standard 5 year time limit; the development being carried out in accordance with the permitted details; the submission and approval of details of all construction materials to be used externally; hours of working during construction being restricted to between the hours of 0800 and 1800 on Mondays to Fridays and between the hours of 0900 and 1300 on Saturdays, with no operations on Sundays or Bank Holidays; deliveries for construction being undertaken outside of school peak times; the provision of wheel washing facilities for the duration of the construction period; the recommendations set out in the Ecological Appraisal being implemented; the submission of archaeological field evaluation works; the provision and permanent retention of the vehicle, cycle and scooter parking facilities prior to the occupation of the school; the submission of an updated School Travel Plan prior to the occupation of the extension and its annual review with the results being published on the school website in order to encourage amongst other matters the safe crossing of the A229 and surrounding roads; and the submission of a native species landscape scheme and details of a maintenance scheme for such

landscaping; and

- (b) the applicants be advised by Informative that:-
- (i) they should register the School Travel Plan with Kent County Council through the “Jambusters” website;
 - (ii) they should ensure that all necessary highway approvals and consents are obtained;
 - (iii) they should ensure that works on site are carried out outside of the breeding bird season and, if this is not possible, that an ecologist examines the site prior to works commencing; and
 - (iv) the School is strongly encouraged to explore the reopening of the former Postley Road pedestrian access north of Tilling Close in order to redistribute drop-off/collection opportunities.

33. Proposal SE/16/01043/KCC/REG3 (KCC/SE/0055/2016 - Single storey extension to provide additional teaching space, car park extension and landscape improvements to enable the school to expand from 1 fe to 2 fe at Seal CE Primary School, Zambra Way, Sevenoaks; KCC Property and Infrastructure Support
(Item D3)

The Committee noted that consideration of this item had been deferred at the applicants' request to enable them to consider whether there were any further opportunities to improve travel and access arrangements in the light of representations made.

34. Matters dealt with under Delegated Powers
(Item E1)

RESOLVED to note matters dealt with under delegated powers since the last meeting relating to:-

- (a) County matter applications;
- (b) County Council developments;
- (c) Screening Opinions under the Town and Country Planning (Environmental Impact Assessment) Regulations 2011; and
- (d) Scoping Opinions under the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (None).

35. Mr Jerry Crossley
(Item)

The Chairman thanked Mr Jerry Crossley on behalf of the Committee for his many years of excellent and often entertaining advice and wished him well in his retirement. Mr Crossley suitably replied.

(a)

(b)

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SECTION C
MINERALS AND WASTE DISPOSAL

Background Documents - the deposited documents; views and representations received as referred to in the reports and included in the development proposals dossier for each case; and also as might be additionally indicated.

Item C1

Improvement and enhancement of existing waste transfer site by erection of a replacement building to provide covered working area and ancillary site improvements together with retrospective provision for trommel, picking station and wall at Unit 4 Apex Business Park, Queens Farm Road, Shorne, Gravesend, Kent DA12 3HU -20151192 (KCC/GR/0387/2015)

A report by Head of Planning Applications Group to Planning Applications Committee on 14th September 2016.

Application by RS Skips Ltd for improvement and enhancement of existing waste transfer site by erection of a replacement building to provide covered working area and ancillary site improvements together with retrospective provision for trommel, picking station and wall at Unit 4 Apex Business Park, Queens Farm Road, Shorne, Gravesend, Kent DA12 3HU – 20151192 (KCC/GR/0387/2015)

Recommendation: Planning permission be granted subject to conditions.

Local Member: Mr Bryan Sweetland

Classification: Unrestricted

Site and Surroundings

1. Apex Business Park lies to the south of Hoo Railway Junction, approximately 2.5 km north-east of the urban fringe of Gravesend, 2km north of Shorne and 2km north-west of Higham. The site is accessed from Queen's Farm Road and the Lower Higham Road to the west towards the Lion Roundabout in Gravesend, which accesses the A226. Lower Higham is to the east of the junction of Queen's Farm Road with Lower Higham Road. Queen's Farm Road is a cul-de-sac, which terminates at the railway siding. This road also serves a farm and a number of residential properties associated with the farm, but the majority of traffic using the road is associated with the Business Park.
2. The Business Park is located within the generally low-lying area of Shorne Marshes, flat arable farmland which stretches north towards to the River Thames. The North Kent Railway line runs broadly east to west across the landscape. Further to the north is an area of coastal grazing marsh with estuarine mud flats. To the north east of the site is a rail freight sidings and a larger industrial estate consisting of several units. In the distance large industrial structures are viewed to the rear of this flat landscape and include Tilbury Docks, Tilbury Power Station and the new Thames Port Terminal on the Essex side of the River Thames.

20151192 (KCC/GR/0387/2015) - Improvement and enhancement of existing waste transfer site by erection of a replacement building to provide covered working area and ancillary site improvements together with retrospective provision for trommel, picking station and wall at Unit 4 Apex Business Park, Queens Farm Road, Shorne, Gravesend, Kent DA12 3HU

3. The Business Park is visible over long distances from the south however it is not generally visible from the north side of the railway because of changes in level and general vegetation along the boundary of the railway.
4. The nearest residential property to the site is approximately 320 metres to the south, at Queens Farm. The original complex of farm buildings located on the east side of Queens Farm Road has planning permission to be converted to residential use. There are new replacement farm buildings on the west side of Queens Farm Road, which consist of large-scale steel-framed structures, clad externally with Norfolk Boarding. Queens Farm House is not listed, but, together with the farm cottages, barns etc., is at the centre of the Queens Farm Conservation Area which extends northwards (to a boundary with the industrial estate) and eastward beyond the farm complex across the adjacent former orchard land.
5. As set out above Hoo Junction Railway siding lies immediately to the north of the site. This is a substantial freight depot covering some 2.5 ha (some of which is open scrub/ woodland) and is raised slightly above the application site. Crossrail is a cross-London rail connection and in 2018, giving access from Heathrow and Maidenhead in the west to Abbey Wood (which lies on the traditional railway line between Gravesend and London) in the east. There is the possibility of the future extension of Crossrail from Abbey Wood to Gravesend to help address future peak capacity issues. Subsequently an area of land including facilities at Hoo Junction is safeguarded to allow for this. The safeguarding to afford protection to High Speed 1 (HS1 - originally Channel Tunnel Rail Link) also covers the existing rail lines and sidings to the north of the application site.
6. The former British Uralite complex lies to the north of Hoo Junction. This used to manufacture asbestos products, including chimney pots and pipes. It is now known as the Nuralite Industrial Estate, with units varying from 93 sq. m. (1,000 sq. ft.) to over 1858 sq. m (20,000 sq. ft.) in area. And is accessed via Canal Road, Higham.
7. The site lies within the Metropolitan Green Belt, but does not fall within any area specifically designated for nature conservation. However, the South Thames Estuary & Marshes Site of Special Scientific Interest (SSSI) is situated to the north of Hoo Junction, approximately 140 metres from the site. This SSSI forms part of the Thames Estuary & Marshes Special Protection Area (SPA) and Wetland of International Importance under the Ramsar Convention (Ramsar Site). The Kent Downs Area of Outstanding Natural Beauty (AONB) lies approximately 3km to the south of the site. Natural England characterises the site and surrounding area as National Character Area (NCA) 81: Greater Thames Estuary. The site sits on the south western edge of this NCA. The Landscape Assessment of Kent characterises the area encompassing the site as Hoo Peninsular Landscape Character Area (LCA). The Gravesham Landscape Character Assessment characterises the area as the Higham Arable Farmland LCA. These designations recognise the predominantly flat, low-lying alluvial marsh and arable nature of the landscape; and the intrusive nature of development pressures in and around major settlements with urban, industrial and recreational site often highly visible within the low-lying marshes.

20151192 (KCC/GR/0387/2015) - Improvement and enhancement of existing waste transfer site by erection of a replacement building to provide covered working area and ancillary site improvements together with retrospective provision for trommel, picking station and wall at Unit 4 Apex Business Park, Queens Farm Road, Shorne, Gravesend, Kent DA12 3HU

8. The Application site itself lies adjacent to the northern boundary of the Business Park and is accessed up a slope off the central estate road and consists of 0.44 ha of concrete hard standing with sealed drainage, some fairly recent. It is bounded by security fencing and the other uses on the Business Park lie to the east, south and west. There is an open area immediately in front of the entrance gate and just to the east of it, there is a weighbridge. There are further storage areas at the east end of the site, together with areas devoted to the repair of vehicles and plant. There are a number of storage containers located here. Storage for empty skips was taking place at the western end of the application site, where it is proposed to locate the building being applied for.
9. There are a variety of other uses operating on the estate including scaffolding businesses, portaloo hire company, commercial vehicle depot, another skip hire business (no waste handling), specialist car repairs, a kickboxing gym and industrial generator supply/installation company. All of these uses access the industrial estate along Queens Farm Road.

Background and Recent Site History

10. Prior to considering the merits of this application it is also useful to understand the planning history for this site and to explain the current position on site. I set out below the background to the use of the site and the more recent events that have led to the situation on site at present.
11. RS Skips took over the site following the grant of planning permission to use it as a waste transfer facility in 2010. Prior to that, Unit 4 accommodated a Builders Merchants and Plant Hire Company and housed a variety of single-storey workshops and storage sheds, together with various single-storey and two-storey Portacabins. There were also various storage structures including racks, tanks and containers. Before that, the site previously had a Heavy Goods Vehicle Operating Centre Licence for 7 heavy goods vehicles, and prior to that was used as a specialised vehicle dismantling business involving the depollution of scrapped vehicles. Prior to that, the site was a plant hire and storage yard.
12. There were two existing buildings on site, steel framed prefabricated structures of semi-circular section, and positioned alongside each other. The larger building was approximately 10.7m wide x 41m long x 5.6m high and the smaller building (vehicle maintenance) was approximately 7.5m wide by 10m long x 5.6m high. The larger building was damaged by a machine working on site and both buildings were subsequently demolished in September 2014. The Applicant is now seeking planning permission for a replacement building.
13. The relevant planning history is set out below:

20151192 (KCC/GR/0387/2015) - Improvement and enhancement of existing waste transfer site by erection of a replacement building to provide covered working area and ancillary site improvements together with retrospective provision for trommel, picking station and wall at Unit 4 Apex Business Park, Queens Farm Road, Shorne, Gravesend, Kent DA12 3HU

- 20070873 – Outline Application for the demolition of the existing sheds and Portacabins and the erection of 12 light industrial units in three blocks – Approved 5 March 2008 - not implemented, now lapsed.
 - 20090537 - Outline Application for the demolition of the existing sheds and Portacabins and the erection of 12 light industrial units in three blocks – Approved 25 August 2009.
 - GR/10/412 - Change of use to a waste transfer station, reuse of existing permanent buildings and removal of all except one portacabin - Permitted 8 September 2010.
 - GR/10/412/R3 – Erection of proposed security hut and dog kennel pursuant to condition 3 (restriction of permitted development rights) – Permitted 7 January 2013
 - GR/13/708 – Erection of permanent single-storey office building at the existing waste transfer station to replace portacabin accommodation - Permitted 16 October 2013
 - GR/14/617 – Resubmission of GR/13/708 for the erection of a permanent single-storey office building at the existing waste transfer station to replace portacabin accommodation - Permitted 8 September 2014.
 - KCC/GR/0431/2014 – (Submitted November 2014) Erection of a replacement building to provide covered working area, provision of trommel and picking station at existing waste transfer station. – Withdrawn 25 November 2015
14. Effectively planning permission GR/10/412 sets the parameters within which the current use operates and therefore the conditions attached to it are relevant. As such that application sought permission to change the use of the site to a waste transfer station, to be used for the separation of construction and demolition waste into individual waste streams to be bulked up for onward recycling, and the disposal of non-recyclable materials to landfill. The tipped waste was to be sorted within the larger of the two existing buildings. Fundamentally through the conditions attached to that consent the site is presently restricted to handling no more than 55,000 tonnes per annum of waste, with no more than 24 HGV movements per day, (the applicant explained this would utilise their existing fleet of 6 skip lorries and one additional visit per week by a bulk HGV to collect sorted waste for recycling). In addition no stockpiles, skip stacking, container stacking, portacabin or plant or machinery were to exceed 3m in height.
15. At the same time the buildings were being taken down a 2.7 metre (approx.) high breezeblock wall was constructed on the northern boundary of the site. The Applicant explained this was to retain the bank and soils of the embankment up to the rail sidings land behind, which were falling into the site. The wall was constructed without the benefit of planning permission, and retrospective planning permission is sought as part of this application. At some time, whether when the wall was built or previously, the boundary of the site has been extended northward by a metre or so onto land outside of the industrial estate (and outside of the boundary of planning permission GR/10/412). This was brought to the attention of the Applicant who has now served an additional notice on the owner of that land and retrospective permission is sought for the change of use of the land to part of the waste transfer site.

20151192 (KCC/GR/0387/2015) - Improvement and enhancement of existing waste transfer site by erection of a replacement building to provide covered working area and ancillary site improvements together with retrospective provision for trommel, picking station and wall at Unit 4 Apex Business Park, Queens Farm Road, Shorne, Gravesend, Kent DA12 3HU

16. Since the removal of the two Nissan hut type buildings, the waste sorting activities have been taking place in the open. The site is subject to an Environmental Permit for a waste transfer station which is issued and monitored by the Environment Agency (EA). The report issued following the removal of the buildings sets out the EA position at that time and reads:

Inspection date 15 September 2014:-

(1) "On approach to the site it was observed that the building had been removed and the footings for a new perimeter wall were underway. A large stockpile of soil dug out to accommodate wall footings was present in the middle of the front of the site. The Operator explained that there had been an accident with a 360 and the whole shed had been at risk of collapse so the building had been demolished about 2 weeks ago."

(2) "The building infrastructure has been completely demolished and removed from site due to the accident that deemed the building unsafe. Currently all treatment activities on site are not contained within the infrastructure of a building."

(3) "These serious and considerable permit contraventions cannot continue indefinitely and a solution needs to be found regarding the erection of a new building on site or alternatively the permit needs to be varied to allow these waste activities without a building. Failure to resolve this issue in agreed timescales with the EA will result in the issue of a Notice."

17. Condition 2.3 of the permit (issued by the EA) required the transfer operations to take place within a building. In January 2015 the EA set out an agreed temporary enforcement position with the operator (RS Skips Ltd) which effectively allowed storage of waste outside a building (with some additional conditions) until such times as the relevant planning application is determined.
18. Around June of last year the Applicant chose to erect the trommel and picking station on site in advance of a planning decision on the matter. This is in breach of planning control and they have been advised accordingly. The Applicant sought consent from the Environment Agency to commission the plant and I understand they were given three days to trial the operations after which time they were not to run any waste through the plant. The trommel was operated beyond this deadline. The use of the trommel in this way, without any building to enclose the loading activities, resulted in a significant level of complaint of dust and noise issues arising from the local area. I understand the trommel and picking station do not form part of the current permit for the site and the EA have instructed them not to use it any further.
19. The approved office building (GR/14/617) has now been constructed on site and a condition requires that all remaining portacabin and container structures be removed from site upon first occupation of the new building. However the proposed layout

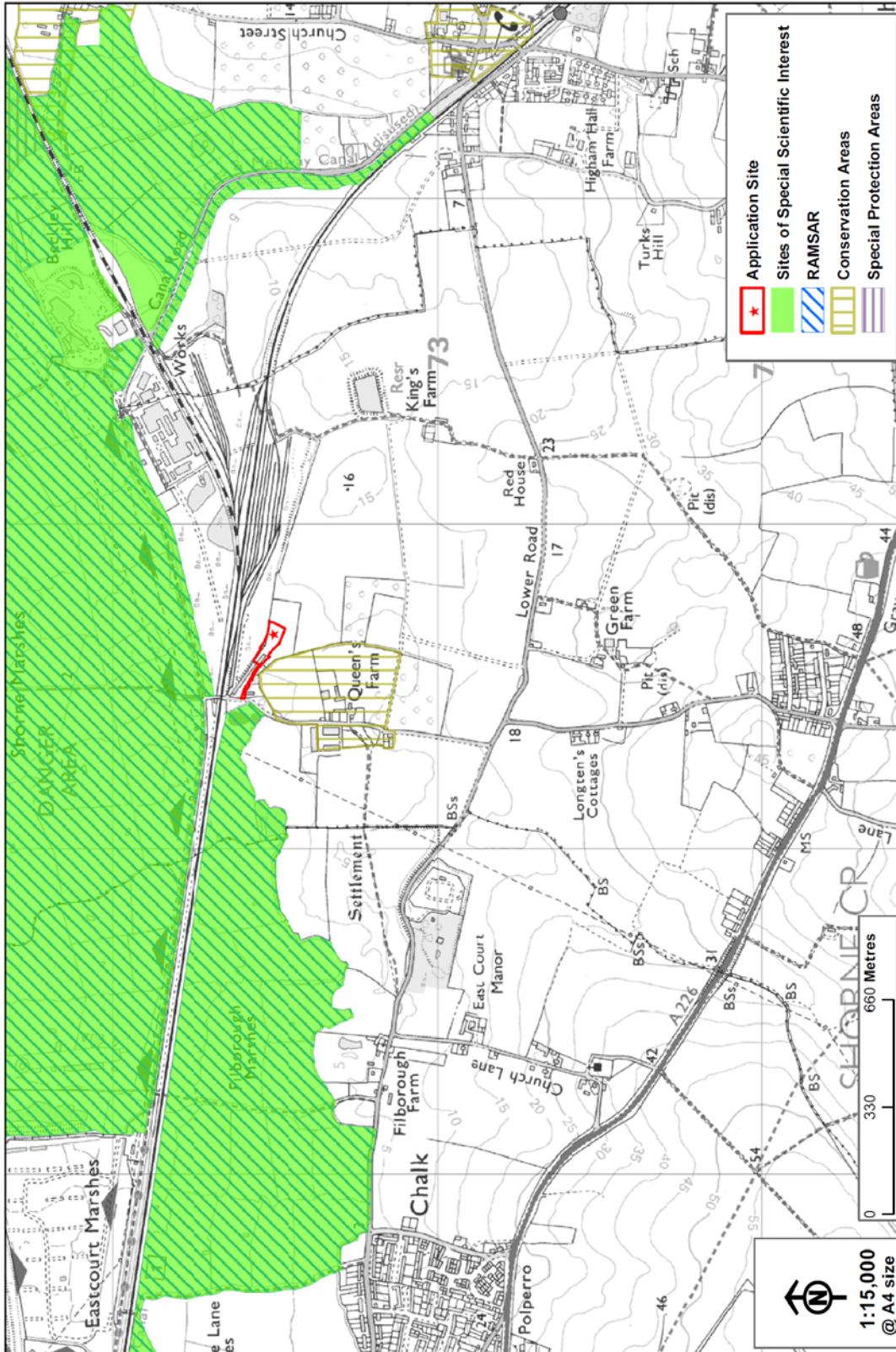
20151192 (KCC/GR/0387/2015) - Improvement and enhancement of existing waste transfer site by erection of a replacement building to provide covered working area and ancillary site improvements together with retrospective provision for trommel, picking station and wall at Unit 4 Apex Business Park, Queens Farm Road, Shorne, Gravesend, Kent DA12 3HU

drawing on this application now seeks to retain the vehicle maintenance building at the eastern end of the site.

20. It should be noted that planning application KCC/GR/0431/2014 was for a similar development as that now proposed but had been changed numerous times which resulted in a poorly drafted and confusing submission. Hence the application was withdrawn following a change of Agent and this proposal before Members now seeks permission for a replacement building, retrospective permission for the trommel and picking station and wall, as well as other ancillary changes to the operations on the site, including the retention of the vehicle maintenance building.

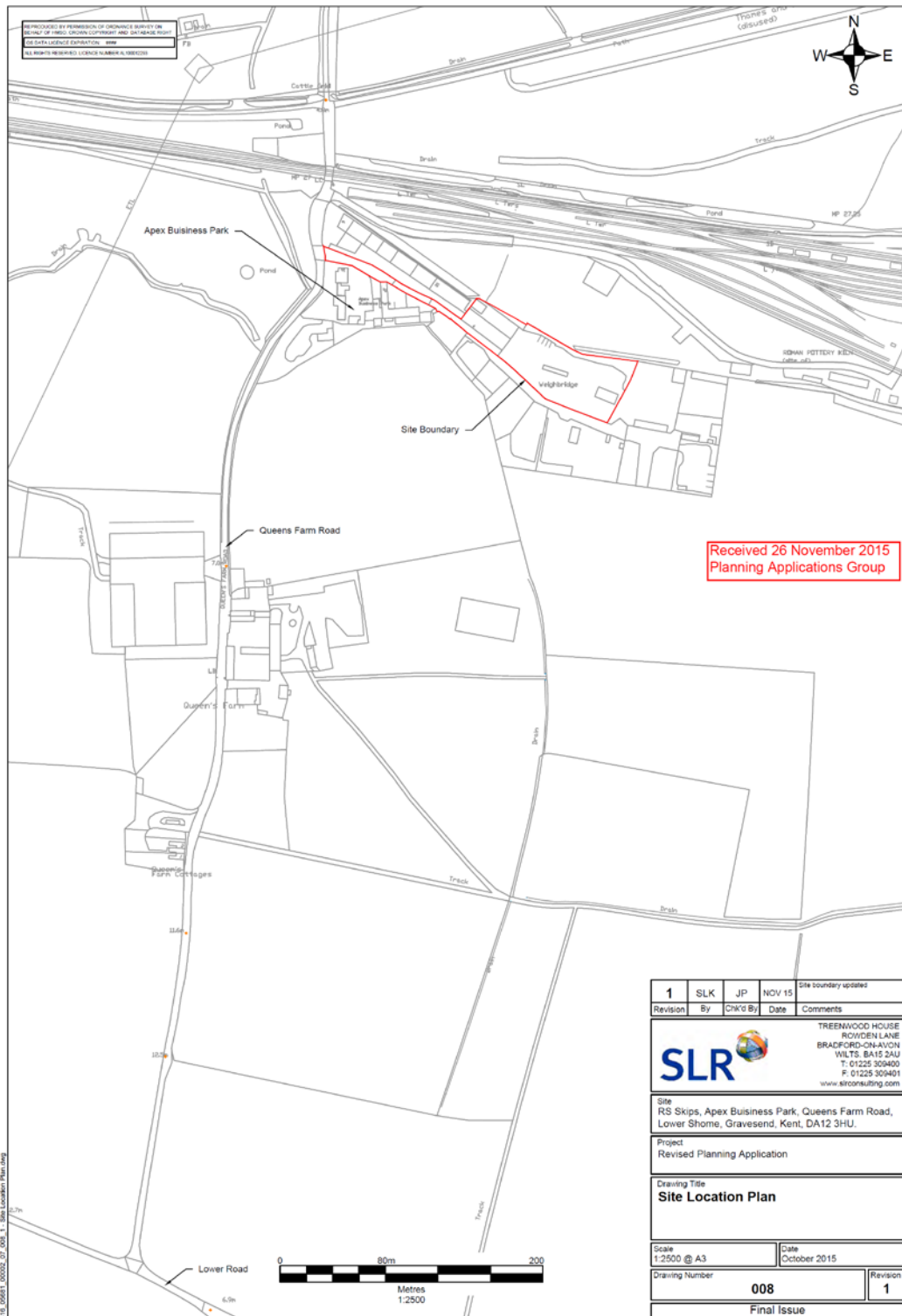
20151192 (KCC/GR/0387/2015) - Improvement and enhancement of existing waste transfer site by erection of a replacement building to provide covered working area and ancillary site improvements together with retrospective provision for trommel, picking station and wall at Unit 4 Apex Business Park, Queens Farm Road, Shorne, Gravesend, Kent DA12 3HU

General Location Plan



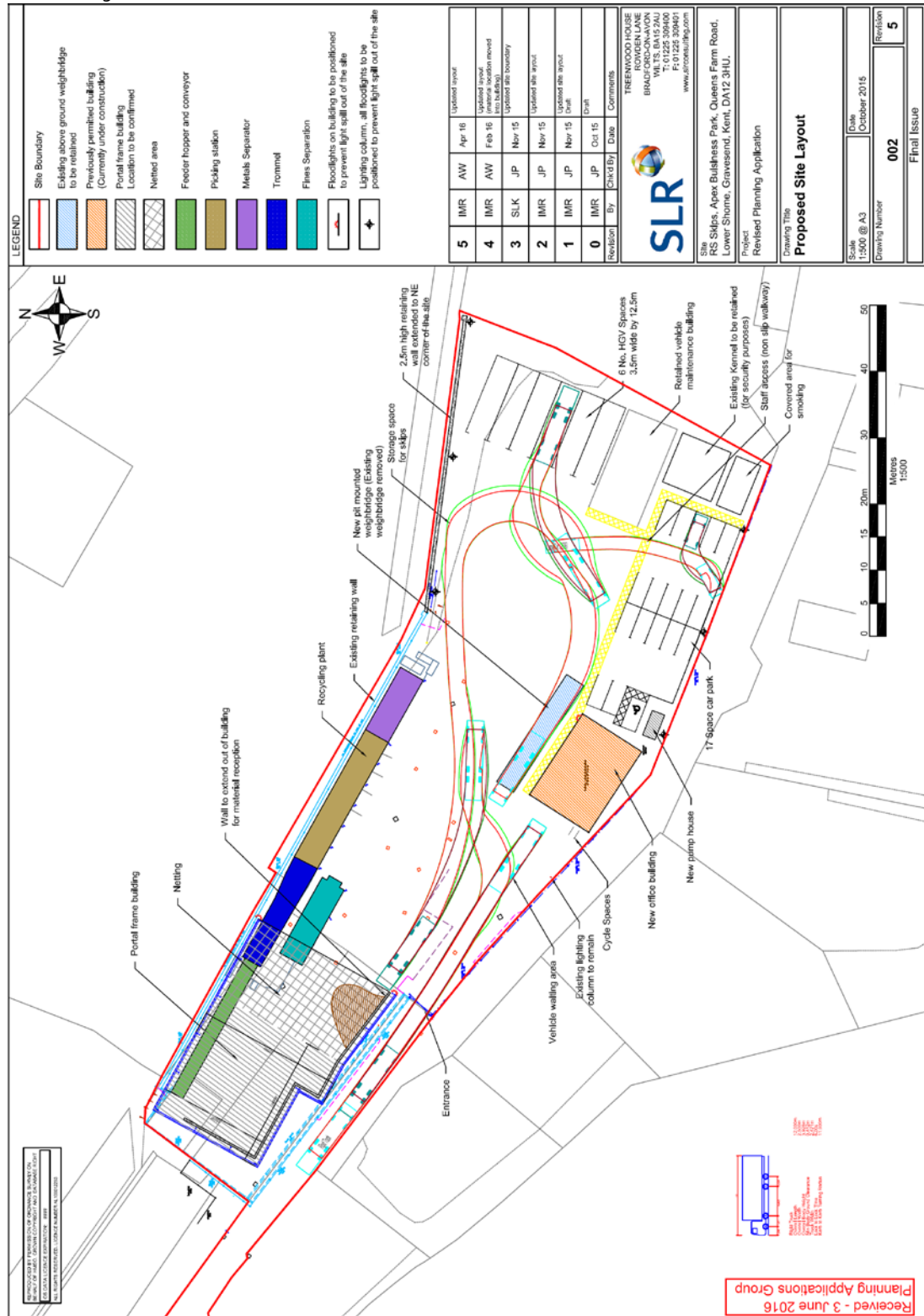
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Site Location Plan



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Site Layout Plan



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Proposal

21. As set out previously this application was submitted following the withdrawal of an earlier one which involved similar proposals and had been amended several times over the preceding 12 months. This new application was submitted to unify all of those amendments, it too has been amended to reduce the overall size of the building.
22. This application seeks planning permission for the erection of a replacement building to provide a covered working area and retrospective provision of a trommel and picking station at the existing waste transfer site. In addition retrospective planning permission is sought for the erection of the 2.7m high breezeblock wall along part of the northern boundary of the site, as well as the change of use of a small parcel of land to the north which has been annexed into the site boundary. It is proposed that the retaining wall on the northern boundary is extended all the way up to the NE corner of the site. The existing weighbridge is to be removed and replaced and the layout of the site would be adjusted to accommodate all of these changes along with dedicated parking and turning areas.
23. Initially it was proposed to increase the throughput of waste up to 75,000 tpa, along with a significant increase in vehicle movements, but the application has been amended since submission and it is now proposed to remain operating at the consented levels of 55,000 tpa with a smaller increase (than initially proposed in this application) in the associated number of HGV movements from 24 to 74, over those limited by the current conditions.
24. Initially the proposed building was 39.5m x 20m but has now been reduced in size so that the steel frame building would measure 19.85m x 22m at its widest (it is stepped in towards the back of the site to measure 13m x 18m) and is just over 12 metres at its maximum height. It would be located at the western end of the site and sits 1m inside of the 2.7m high retaining wall on the north eastern boundary. The frame is clad with a 2m high blockwork wall with single skin steel sheet cladding above, although most of the north eastern side (adjacent to the retaining wall) of the building is open. It is proposed to extend the steelwork of the building on the north elevation and with a clad wall on the southern elevation (approx. 13m in length) to support netting over the whole area to assist with preventing wind-blown material beyond the building. An internal wall is proposed from the western end all the way along the south western elevation and along the clad wall which supports the netting.
25. The trommel and picking station (already erected on site) measures approximately 70m in overall length. The feed hopper and the first section of conveyor are within the building, the trommel and fines separator are partially within the netted area but also extend by about 2/3rds of their respective lengths beyond, into the open. The picking station is semi-enclosed by cabins along the conveyor before the line terminates with an open metals separator. The plant is a maximum height of approx. 8m with the picking station being just over 6 m for the majority of its length.

Operations

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26. The Applicant's fleet of skip loader vehicles would typically bring around 50% of the daily waste imports, with the remaining 50% brought in by a mixture of ro-ro and tipper HGVs. Loaded vehicles would arrive at site and be directed to the weighbridge or be held in the waiting area. Once weighed, vehicles would tip their load onto the ground in the material reception area in front of the building. Empty skips would be taken back to the skip storage area if not going out again straight away. Following tipping the material would immediately be swept into the building by a JCB, where very large objects would be separated from the waste stream before the remainder is loaded into the hopper by a 360 excavator, for processing. The material would travel via conveyor to the trommel (drum separator) which would remove the fines from the waste stream into a fines separator before they are deposited into a separate container. The waste material would continue along the conveyor into the semi-enclosed sorting cabin/picking station where the operatives would remove recyclable materials by hand and sort into chutes with containers below for the various waste streams. Finally the waste would pass through a separator to take out any metals and the residue inert waste would drop into a separate bin.
27. The sorted wastes would then be baled and prepared for onward distribution to the various recycling companies, as follows:

Wood, Plasterboard	Countrystyle Group, Ridham
Green Waste	Countrystyle Group, Ridham
Metal	EMR, Strood
Inert Material	Hermitage Quarry, Maidstone
Fines Material (used as cover material)	Pitsea Landfill
Cardboard/Paper	Smurfit Kappa, Snodland
General Residue (RDF Material)	McGrath Brothers Ltd, Essex
Hard/Soft Plastics	Kingsnorth Waste Management, Hoo

28. It is proposed that the permitted level of traffic be increased from 24 to a maximum of 74 HGV movements per day (37 in and 37 out) which the applicant considers is a more realistic level likely to be generated by the permitted throughput (55,000tpa).
29. The site would continue to operate under the existing approved hours of operation which are as follows:-
- Monday – Friday 07:00 to 18:00 hours;
 - Saturdays 07:00 to 13:30 hours; and
 - No working on Sundays and Bank Holidays.

There would continue to be 15 full time staff employed at the site (those presently working in the open yard would be moved into the picking station).

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Planning Policy

30. **National Planning Policy and Guidance** – the most relevant National planning policies and policy guidance are set out within the following documents:

National Planning Policy Framework (NPPF) (March 2012) sets out the Government's planning policies for England and is a material consideration in the determination of planning applications. The Framework does not vary the status of the development plan (included below), which remains the starting point for decision making.

The NPPF contains a presumption in favour of sustainable development, which includes economic, social and environmental dimensions that should be sought jointly and simultaneously through the planning system. In terms of delivering sustainable development in relation to this development proposal, Chapters 1 (Building a strong, competitive economy), 4 (Promoting sustainable transport), 9 (Protecting Green Belt land), 10 (Meeting the challenge of climate change, flooding and coastal change), 11 (Conserving and enhancing the natural environment), and accompanying Technical Guidance are of particular relevance.

The NPPF seeks local planning authorities to look for solutions rather than problems and to approve sustainable development that accords with the development plan, unless material considerations indicate otherwise. Where the development plan is absent, silent or out-of-date, the Framework seeks that permission be granted unless any adverse impacts would significantly and demonstrably outweigh the benefits when assessed against NPPF policies.

National Planning Policy Guidance (NPPG) (March 2014) supports the NPPF including guidance on planning for air quality, natural environment, noise, transport and waste (amongst other matters).

In the case of waste related development, the NPPG requires that applicants be able to demonstrate that their proposals will not undermine the waste planning strategy through prejudicing movement up the waste hierarchy. It goes on to confirm that if the proposal is consistent with an up to date Local Plan, there is no requirement to demonstrate 'need'.

Particularly relevant to this application, the guidance states that "*the waste planning authority should not assume that because a particular area has hosted, or hosts, waste disposal facilities, that it is appropriate to add to these or extend their life. It is important to consider the cumulative effect of previous waste disposal facilities on a community's wellbeing. Impacts on environmental quality, social cohesion and inclusion and economic potential may all be relevant. Engagement with the local community affected by previous waste disposal decisions will help in these considerations*".

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Waste Management Plan for England (December 2013) is a high level document (non-site specific) which provides an analysis of the current waste management situation in England, and evaluates how the objectives and provisions of the revised European Waste Framework Directive will be supported and implemented. It sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management. Positive planning plays a pivotal role in delivering this country's waste ambitions through:

- delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits, by driving waste management up the waste hierarchy;
- ensuring that waste management is considered alongside other spatial planning concerns, such as housing and transport, recognising the positive contribution that waste management can make to the development of sustainable communities;
- providing a framework in which communities and businesses are engaged with and take more responsibility for their own waste, including by enabling waste to be disposed of in line with the proximity principle;
- helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment; and
- ensuring the design and layout of new residential and commercial development and other infrastructure (such as safe and reliable transport links) complements sustainable waste management, including the provision of appropriate storage and segregation facilities to facilitate high quality collections of waste.

National Planning Policy for Waste (NPPW) (October 2014) sets out Government's detailed waste planning policy on waste, and should be read in conjunction with the NPPF and Waste Management Plan for England. Appendix B considers locational criteria in considering suitable sites in the preparation of Local Plans and in determining planning applications.

31. **Development Plan Policies:**

Kent Minerals and Waste Local Plan (MWLP) 2013-30 July 2016 - Policies include: CSW1 (Sustainable Development), CSW2 (Waste Hierarchy), CSW4 (Strategy for Waste Management Capacity), CSW6 (Location of Non-Strategic Waste Sites), CSW7 (Waste Management Facilities for Non-Hazardous Waste), CSW8 (Recovery Facilities for Non-Hazardous Waste), CSW16 (Safeguarding of Existing Waste Facilities), DM1 (Sustainable design), DM2 (Environmental and Landscape Sites of International, National and Local Importance), DM3 (Ecological Impact Assessment), DM4 (Green Belt), DM5 (Heritage Assets), DM6 (Historic Environment Assessment), DM10 (Water Environment), DM11 (Health and Amenity), DM13 (Transportation of Minerals and Waste), DM20 (Ancillary Development) and DM22 (Enforcement).

Gravesham Local Plan Core Strategy September 2014 – the most relevant Policies include: CS01 (Sustainable Development), CS02 (Scale and Distribution of Development and Green Belt), CS07 (Economy, Employment and Skills), CS11

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(Transport), CS19 (Development and Design Principles) and CS20 (Heritage and Historic Environment).

Gravesham Local Plan First Review (1994) Saved Policies: Policies T1 (Impact of Development on the Highway Network), T2 & T3 (Use of Primary Network), T4 (Development outside the built up area), T5 (New Access onto Highway Network) and P3 (Vehicle Parking Standards).

32. **Planning (Listed Buildings and Conservation Area) Act 1990** - Section 72 of the requires planning authorities to pay special attention in the exercise of planning functions to the desirability of preserving or enhancing the character or appearance of a Conservation Area.

Consultations

(Comments relate to the latest amended proposals)

33. **Gravesham Borough Council:** Object – The Borough Council considers that traffic impacts are the key determining issues and the Borough Council would wish to highlight that strong objections have been raised by Higham Parish Council, Shorne Parish Council, The Dickens' Country Protection Society and numerous local residents. These local stakeholders raise a number of important issues but clearly the most significant concerns relate to the impacts of the proposed increased lorry movements on highway safety, residential amenity and the natural and historic environments. The Borough Council shares these concerns.

If planning permission were to be granted for the proposed development, the Borough Council would wish to see conditions attached which restrict the total throughput of waste to 55,000 tpa, the total number of HGV movements, their timing, routing and road worthiness (e.g. no mud or debris on the public highway) and also to mitigate the environmental impacts of the operation of the WTS. These conditions should include the mitigation of dust, noise, litter, odour, lighting and vibration impacts to the surrounding area. In addition the external facing materials for the building, the colouring of the machinery and the provision of landscaping should be subject to condition. Lastly watching brief soil contamination and archaeology conditions would be requested. A s.106 agreement may provide additional confidence in any routing or tonnage restrictions. KCC may wish to consider whether traffic management, signage, speed and weight restrictions would mitigate the traffic impacts.

Shorne Parish Council: Object – The amended proposals seek to legalise a level of traffic that breaches planning and with three times the number of HGV's and bigger vehicles. The amended building is taller than previously proposed. The estate should look to work together to provide plant screening for the whole site. Views from higher vantage points should be considered as well as the impact on openness, as well as the visual impact of the vehicles visiting the site, particularly light pollution during the hours of darkness. The transport assessment and data is not accurate or honest about the impacts. Other concerns relate to dust control, amenity impacts, heritage

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impacts, future developments and the need to condition operational volumes. In addition it repeats previous concerns relating to intensification of use, unsuitability of location, number of vehicle movements, unsuitability of local roads, road safety concerns, and amenity impacts on local residents, adjoining businesses and the environment.

Higham Parish Council: Object – The proposals to increase the number of HGV movements along with the increase in general traffic will have a negative impact on the residents of Chalk and Higham with significant loss of residential amenity.

Environment Agency: No objection. As set out earlier in this report they have been closely monitoring activities at this site and have agreed a holding enforcement position whilst this application is determined. Should planning permission be granted they would look to amend the environmental permit and assess the existing permit conditions to ensure the treatment of waste activity is contained,. If permission were refused they would need to consider whether the operator could demonstrate that appropriate measures could be put in place to manage dust risks with a variation to the permit to make the operator compliant.

Natural England: No objection in terms of the impact upon statutory nature conservation sites. Also advises that if undertaken in accordance with the details submitted it does not need to be subject to Appropriate Assessment under the Conservation of Habitats and Species Regulations 2010 (The Habitat Regulations). Refers to standing advice on protected species and the need to consider impacts on priority habitats and local sites.

Network Rail: raise no objections to the application but offer advice to the Applicant that both during construction and after completion of works on site the proposal does not encroach onto network rail land, affect the safety, operation or integrity of the company's railway and its infrastructure, undermine its support zone, damage the company's infrastructure, place additional load on cuttings, adversely affect any railway land or structure' over-sail or encroach upon the air-space of any Network Rail land, cause to obstruct or interfere with any works or proposed works or Network Rail. They have also provided a detailed comment on the requirements for the safe operation of the railway and the protection of Network Rail's adjoining land for the Applicant.

HS1 Safeguarding: Has no comment on the application.

Amey (Noise, Dust, Vibration and Odour)

Noise and Vibration - The noise assessment is compliant with the requirements of the National Planning Policy Framework and Planning Practice Guidance and is in accordance with guidance within BS 4142:2014. It is considered that noise levels from the development are acceptable subject to condition to following condition:

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The noise level from the site at Queens Farm House shall not exceed a rating level under BS 4142:2014 of 41dB LAr,1h. The noise levels from the site at any neighbouring commercial or industrial site shall not exceed 60 dB LAeq,1h.

In order to avoid potential vibration issues at the neighbouring properties from the use of high weighted machinery, it is recommended the inclusion of the following planning condition:

Vibration levels generated by the site activities shall not exceed a VDV,16h of 0.8 ms⁻¹.75 when measured inside buildings of neighbouring properties. Groundborne noise generated by activities within the site shall not exceed 45 dB LAmax (re. 2x10⁻⁵ Pa) when measured inside buildings of neighbouring properties. If access to the neighbouring sites is granted, evidence of compliance with the conditions above shall be provided at the request of the County Planning Authority.

Finally, it is recommended that the number of HGV movements be limited to 74 HGV movements per day in line with the traffic flows considered in the transport assessment.

Air Quality – It is recommended that a condition requiring the submission of a dust management plan (DMP) be attached to any permission granted. The DMP should detail how dust will be controlled at each stage of the handling of the waste materials at the site and vehicles leaving the site. The proposed dust suppression system proposed by the Applicant in the letter from the Agent could be one such measure. To ensure the risk of nuisance of odour from the site is minimised it is recommended that conditions relating to:

- The removal of any putrescible waste from the site within 48 hours (as proposed by the Applicant);
- Respond to any complaints within 24 hours, which if justified after investigation, will trigger remedial actions to prevent re-occurrence.

Kent County Council Highways and Transportation: No objection (see comments in full below)

“1. The current application does not increase the throughput of waste materials from 55,000 tonnes / year but it is accepted that the previous Planning Condition restricting HGV movements to 24 per day (12 in, 12 out) is not compatible with the yearly throughput. As a result, the site has been operating with the number of HGV movements (generally skip lorries) exceeding the permitted number for a considerable time.

2. The site access off Queens Farm Road is acceptable having sufficient width and visibility for the type of usage.

3. Queens Farm Road, whilst being narrow in places (up to 5.5m in width) has sufficient passing places and generally adequate forward visibility for the current

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(which includes proposed skip lorry movements) level of usage. Traffic flows are low as it is a no through road and only serves the remainder of the Apex Business Park, a few residential properties and a farm.

4. The junction of Queens Farm Road with Lower Road meets highway standards in respect of layout and visibility.

5. Lower Road is subject to a 50 mph speed limit and is of adequate width for the traffic volume it carries. The traffic flows along this road in both directions towards Higham and towards Chalk are low and well below the road's theoretical capacity. Lower Road becomes Lower Higham Road through the built-up area of Chalk where the carriageway widens to 7.3 m, and has footway and street lighting facilities. Again traffic flows are low compared with the capacity.

6. Both Queens Farm Road and Lower Road currently have low levels of traffic which are confirmed by surveys undertaken in September 2015 (when the proposed level of skip lorry movements was already occurring) For Lower Road, this revealed two-way flows of up to 150 vehicles per hour at peak times (08:00 - 09:00 and 17:00 - 18:00) and up to 110 vehicles per hour at other times. These represent a frequency of 1 vehicle every 24 seconds and 1 vehicle every 33 seconds respectively.

7. Similarly, traffic flows along Queens Farm Road are considered very low with a maximum of 60 vehicles per hour (one per minute) in the am and pm peaks and 50 vehicles per hour at other times.

8. The provision of sustainable means of transport for employees is difficult in such a remote rural location but this application does not propose any increase in existing staffing level. It would be difficult to expect any significant increase in access by employees by sustainable means but car sharing / cycling should be encouraged. It is unlikely to have any impact on traffic movements to and from the site.

9. The 5-year crash record in the vicinity of the site reveals no significant safety problems and no crashes indicate any relationship to road alignment or sub-standard junction. No crashes involved HGVs. Guidance on Transport Assessments recommends that crash records over 5 years old are not relevant and should not be considered.

10. The proposal is likely to result in 74 two-way skip lorry movements per day. This is confirmed by a manual traffic count undertaken at the Queens Farm Road / Lower Road junction in January 2016 when movements in excess of the current permitted level were operating. The survey shows that the peak skip lorry movements did not occur at peak road network times (10:00 - 11:00 and 13:00 - 14:00) therefore the impact on the network is somewhat less than the "worst case". There is no evidence that, even with the current operating level being similar to that applied for, there are any highway safety or congestion issues being experienced on the local road network.

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11. The manual survey revealed that, based on current movements, 60% of skip lorry movements from Queens Farm Road onto Lower Road were to / from the West towards Chalk and 40% were to / from the East towards Higham / Shorne. This contradicts statements in the previous TA which indicated that the vast majority of movements were to the West away from the villages of Higham and Shorne. Whilst this does not raise a highway safety or capacity issue considering the number of vehicle movements involved, it does raise questions regarding the routes skip lorries are using when it is alleged that the majority of customers are to the west in Gravesend / Dartford and the major road network is in that direction. It is considered that a lorry routing agreement with KCC Highways may help mitigate the impact of the development on local communities and this could be required through a Planning Condition.

12. If the baseline traffic flows in Queens Farm Road and Lower Road are assumed to be the total movements observed in the survey less the number of movements currently associated with RS Skips (74) but adding the number of movements currently permitted (24); the impact in percentage terms of the additional two-way movements identified in this application ($74 - 24 = 50$) can be calculated as an increase of traffic movements of 45% along Queens Farm Road and 40% / 19% along Lower Road to the West / East respectively. However, whilst the increase in vehicle movements over the baseline movements appears high in percentage terms it must be remembered that the flows on both roads both in terms of skip lorry movements and background traffic are low in the first place and therefore there appears to be much greater impact than when considered in absolute numbers which are considered to be fairly insignificant relative to the maximum capacity of these roads.

13. In terms of policy, NPPF Paragraph 32 states that development should not be refused on transport grounds unless the cumulative impact is considered to be severe. In this instance, given the low levels of proposed movements (which already exist on the network) and the low background traffic on both Queens Farm Road and Lower Road and the lack of evidence of existing highway problems, the impact cannot be considered to be severe.

14. I am aware of the local concerns about the impact of an increase of skip lorries using the local road network and this is recognised as a valid concern, but rather than the impact on highway safety and congestion, it must be considered that it is the environmental impact of these skip lorries due to noise, smell, vibration, appearance etc. which are not highway impact issues.

15. In conclusion, taking into account my above observations, there is no highway objection to the proposal but, if possible, a condition should be applied to require a lorry routing agreement to be entered into between the operator and KCC Highways to minimise the impact of the use on local communities.”

Kent County Council's Landscape Advice Service: No Objection (see comments in full below):

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“Site Context - The site is located within a small isolated industrial/business area within the Green Belt. Boundary fencing consists of metal panels and the area has an unattractive appearance. To the south of the site, the surrounding landscape is generally undulating farmland with some very large arable fields where hedgerows have been lost. Hedgerows along roadsides are often gappy although there are some hedgerow trees. Orchards were once prominent but are now in decline. Queens Farm to the southwest has a variety of large industrial type barns and silos which intrude into the landscape. Although the area is a Conservation Area on account of its historic farmstead and workers cottages within their historic rural setting, these are now overshadowed by the more recent agricultural development. Just to the north of the site, the landscape is distinctive consisting of flat open expansive estuarine grazing marsh with dykes and channels dividing the fields. Immediately north of the site are a railway line and sidings. Pylons are prominent within both the marshes and in the arable land to the south. There is a belt of trees and scrubby vegetation to the north of the site, which screens and softens the business area. The condition landscape is poor, with a moderate sensitivity to change.

Proposed Development - The main aspect of the development which would be likely to cause adverse landscape and visual impacts, and impacts on the openness of the Green Belt is the replacement building to accommodate the western part of the picking station, which is 12.2m high to the ridgeline.

Submitted Landscape and Visual Impact Assessment (LVIA) - A LVIA has been submitted. It contains much useful information and analysis, although it is not fully compliant with the methodology recommended in the standard guidance. However despite some defects, the report is useful, but overstates some more distant visual impacts.

Visual Impacts - Close hand views have the potential to cause adverse impacts, but longer distance views, beyond 1km are unlikely to be significantly adversely affected. The vegetation to the north of the site and along the railway would also filter and largely screen views from the north.

The Kent Downs Area of Outstanding Natural Beauty (AONB) lies approximately 3km to the south of the site. At this distance the building would have negligible impact being an extremely small component of the view. Roads, villages, pylons and the urban edge of Gravesend would also be elements of the view. In addition much of this area of the AONB is wooded so that panoramic views would be unlikely.

There would be some close views from Queens Farm Road. The proposed building would be partially above the background of vegetation with the existing business development in the foreground. However the belt of existing vegetation would help to soften the impact of some of the proposed building. Additionally there are several pylons prominent as skyline features/detractors in this view. The road is not a highly sensitive receptor so that adverse impacts would not be significant. The views from houses within the Conservation Area are already adversely affected by the adjoining agricultural buildings, and there would be negligible effect from the proposed

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development. Similarly the setting of the buildings is already badly compromised and the proposed development would not cause any further significant adverse effect.

There is a public footpath about 0.6km east of the site running in a north-south direction. Although this is a sensitive receptor, the change in view would be relatively minor so that adverse impacts would not be significant.

Other receptors have been assessed in the submitted LVIA. The churchyard at St Mary's Church in Chalk is located 1.6km from the site is a sensitive receptor but effects at this distance, with intervening screening and the presence of pylons and distant development on the skyline, would be likely to be only very slight adverse to negligible. This would not be a significant consideration. Similarly the Saxon Shore Way, a promoted route, is located about 1.6km distant. Again intervening vegetation and the presence of pylons would mean that any adverse effects on glimpsed/intermittent views from the PROW would not be significant.

Landscape Character Impacts - The development would be a slight intensification of the industrial estate within the existing footprint of the estate, and whilst this would be an adverse effect I do not consider that this would be significant

Openness of the Green Belt - There would be some very slight impact on the openness of the Green Belt because of the height of the building, but again the built extents fall within the footprint of the existing developed area. Overall I would consider this to be very slightly adverse at most.

Mitigation - The applicant states that mitigation with planting is not possible within the site. The exterior treatment and colour of the building would be an important consideration in reducing any adverse impacts, and I would suggest that this aspect could be dealt with a suitable condition should the application be approved."

Kent County Council's Ecological Advice Service: - We are satisfied that the submitted information has adequately considered the impact from dust and we advise that the dust mitigation measures detailed within the original dust assessment produced by RPS is sufficient to minimise impact.

Kent County Council's Conservation Officer: No Objection

The site is in a rural setting adjacent to areas of open farmland (much of which is designated ESA and SSSI) set within an existing small industrial yard. It is bounded by a railway junction to the north, and the Queens Farm Conservation Area abuts to the south. Green Farm House and Granary are grade II listed buildings set some distance from the site but because of their elevated position, both have views across open farmland onto the proposed building, and thus the proposal will affect their setting. Queens Farm House is not listed but together with the farm cottages, barns etc., is at the centre of the of the Queens Farm Conservation Area and all are considered local heritage assets (as mentioned in para 3.9 of the LVA). Although the height of the proposal continues to mean it will dominate the landscape here, I am pleased to see the overall size of the building has been reduced and it is proposed to

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clad the building to resemble the other agricultural and non-agricultural modern buildings of a similar scale within the Queens Farm complex. The traffic to and from the site passes through the conservation area and has the potential to have a detrimental impact upon it however it is acknowledged that all traffic from the established industrial estate already has to take that route.

Kent County Council's Archaeological Officer: No objection

This industrial unit is on the site of a small outfarm "Princes Farm" or later Old King's Farm. Remains associated with post medieval farming practices may be encountered during any groundworks. As such can I recommend provision is made for an archaeological watching brief during any further groundworks:

Dickens' Country Protection Society – Object

The proposed building is out of scale and would have an inappropriate impact on the openness of the Green Belt. The society is concerned that developments on site are resulting in an increase in traffic on local roads.

Local Member

34. The local County Member for Gravesham Rural, Bryan Sweetland has copied a letter from the Parish Council objecting to the proposals and has commented in support of the objectors. The late Member, Jane Cribbon, one of the Members of the adjacent Gravesham East division wrote in support of the earlier withdrawn application and wished her comments to be taken forward onto this application, as follows:

- This is an established industrial area. Green Belt is a little over elaborate term to use. The essential characteristics of openness and permanence do not apply. Site is used as a waste transfer station therefore the site itself is being improved. (Para. 80 NPPF). Is this not "very special circumstances"?
- Site of a brownfield industrial nature since 1940, therefore would not have " a greater impact on the openness of the Green Belt" than the existing development (NPPF Para. 89).
- KCC gave planning permission for waste transfer station in 2010. It was previously used for vehicle recycling, so an established use
- Borough Council objections in 2010 have now changed to consent, following the Local Plan which has now been agreed (September 2014). Employment issues are a key element. The site has now an established use. GBC wants the site to operate efficiently so raises no objection.
- The building has been sympathetically designed to fit in with local farm buildings and needs to be replaced following an accident which means the a site presently cannot operate effectively.
- The operation of the site has a sustainable function.
- The proposed replacement may be bigger than the original but needs to be sufficiently large in size to operate efficiently. The applicant has reduced the size which it originally proposed. This may well have an effect on the efficiency of the business as large tipping lorries cannot access the building. A new and larger

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building can be justified because it does not really indicate significant scale and massing and can be camouflaged.

- The proposal will improve the working environment, especially for their staff. It should also be noted that the applicant has made clear that there will be no increase in lorry movements. In the near future, Hoo Junction could play a significant role in a possible Crossrail extension into Kent.
- The National Planning Policy Framework has a presumption in favour of sustainable development. This application is certainly sustainable in function and adverse impacts do not outweigh the benefits. In fact it cannot be said that the development would have a harmful effect on the openness of the Green Belt.
- The Environment Agency is the key organisation which will effectively regulate the site.
- GBC has no objection to the development. Any concerns on size and massing may be overcome by effective landscaping and camouflage. Looking towards the site from higher ground the most prominent building in sight is the Tilbury power station.
- The important fact is that this is a business enterprise that provides much needed employment for up to 15 workers from the local area, and also provides a much needed recycling service in the local community. There is no intention to increase lorry movements as a result I raise no objection to the application.

Adam Holloway MP sought action to stop the trommel and picking station being run when first brought to site and has since forwarded letters of objection from some of his local constituents (on the earlier withdrawn application).

Gravesham Borough Councillor Leslie Hills who represents Chalk Ward has written in objecting to the application in support of the local residents of Chalk (which has no Parish Council). He further comments that the proposals would blight the lives of residents in Chalk to an even greater extent than at present.

Publicity

35. The application was publicised by the posting of a site notice, an advertisement in a local newspaper, and the individual notification of 315 nearby properties and neighbouring industrial units. A second round of neighbour notification was also undertaken following receipt of amended plans.

Representations

36. In response to the first round of publicity, 98 letters of objection were received. 40 letters were received in response to the second round of publicity upon the amended plans, the majority of which were repeating previous concerns. A total of 111 responses were objecting to the proposals and 14 were in support of the application and the Applicants business. The **key objections** raised can be summarised as follows (in no particular order):

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- Any increase in HGV traffic is unacceptable and will damage the residential amenity of those living nearby or along the routes to and from the site.
- The site is already noisy and dirty and full of litter.
- The roads between Queens Farm Road and Chalk are very narrow and have numerous blind spots and bends and are unsuitable for bulky traffic, especially where there are parked cars on either side and shops and community facilities used by the vulnerable.
- When the trommel was operated for the limited period it caused vibration issues.
- The sizes of the vehicles visiting the site are getting larger.
- The application site is subject to a covenant that restricts the vehicle movements to a maximum of 80 per day.
- There will be significant damage to health from the fumes associated with the vehicle movements.
- The drivers currently over stack the skips, do not cover them, speed along the lanes and are often on their phones.
- Traffic surveys are not up-to-date and do not represent an accurate picture of present traffic levels.
- The surveys do not take account of new residential development permitted by the Borough Council.
- The applicant does not abide by current conditions so are unlikely to adhere to any new ones.
- The site already operates outside of their restricted hours.
- There are people living on the site.
- The traffic levels proposed represents a 208% increase over their current condition.
- The proposed new building is an unacceptable size and scale and is not enclosed, and the plant is extremely large and detrimental to the landscape.
- Green Farm Lane has weight restrictions on it yet the skip vehicle drivers still use it.
- The lane is too narrow for this type of traffic and vehicles often encroach onto land outside the highway in order to pass, damage has been caused, these are not proper passing places and should not be relied upon.
- The entrance to the farm yard off Queens Farm Road should not be used as a passing place.
- The site is within the Green Belt and is inappropriate for such development.
- The proposed building is significantly larger in scale, height and bulk and along with the trommel will be highly visible in the area and set a precedent for further development.
- Despite what the Transport Assessment says there have been accidents on the affected route.
- The increase in waste would lead to rat infestation to properties and other pests.
- There would be a national security risk to the high pressure gas plant in Lower Higham Road.
- The proposal would destroy the quality of life that could reasonably be expected in this rural/semi-rural setting and in the village.
- The proposal would damage heritage assets in the area.

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- The proposal would have a detrimental impact on house prices.
- The existing lorry traffic is damaging the old brick walls beside Queens Farm.

37. A petition was received in response to the earlier withdrawn application and a request that it be carried over to this application was agreed. The petition states "We the undersigned residents of Chalk wish to express our concern regarding the substantial increase in the amount of RS Skip lorries using Lower Hiham Road en route to their site at Apex Business Park, Queens Farm Lane.", and there are 200 signatories.

Discussion

38. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that applications are determined in accordance with the development plan unless material considerations indicate otherwise. Therefore, the proposals need to be considered in the context of the Development Plan Policies, the National Planning Policy Framework, other Government Policy and any other material planning considerations. In considering this proposal the planning policies outlined in paragraphs (30) to (31) above are particularly relevant.
39. Planning permission was granted for the operation of a waste transfer station at this site in 2010, subject to a number of conditions controlling the activities on site. In principle the waste use was considered acceptable based upon the scale of activities proposed at that time and it being upon an existing industrial estate. Since then an administration building and a dog kennel have been granted permission and built on site. This application seeks retrospective permission for a retaining wall to the rear of the site and for the siting of a processing plant consisting of a trommel and picking station. Planning permission is also sought for a new building to replace the two that were present when permission was first granted for the waste use (and have subsequently been demolished). Consequential amendments to the site layout are also proposed.
40. Although the throughput of waste to be handled at the site is not being increased this proposal sees the introduction of larger scale built development, a processing plant and an increase in the number of HGV movements. It is the introduction of those elements, and the associated increase of activity at the site that should be carefully considered in this Green Belt location. It is necessary to consider the potential impact their introduction would have upon the application site, neighbouring industrial users, the general landscape and residential properties in the vicinity of the site.

Green Belt

41. The whole area surrounding the application site is designated as part of the Metropolitan Green Belt, and therefore this planning application must be considered in the light of this national policy. The Government attaches great importance to Green Belts and this is followed through in Policy DM4 of the Kent Minerals and Waste Local Plan. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping

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land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

42. Once Green Belts have been defined, local planning authorities are advised to plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. Whilst it is acknowledged that the whole industrial estate lies within the designated area and development has previously been allowed, it is relevant to consider each new planning application and the implications of the proposals in the light of green belt policy afresh.
43. The NPPF advises on the types of development that may be acceptable and at the same time identifies developments that should be considered as inappropriate in the Green Belt. For such developments there is then a further level of consideration in policy terms.
44. Particularly relevant in this proposal is the starting point that the construction of new buildings should be regarded as inappropriate in the Green Belt. National Planning Guidance clearly states that if a replacement building is materially larger than the one it replaces, which this one is, then it should be considered inappropriate development.
45. The proposed development is inappropriate not just because of the replacement building but also because the erection of the trommel and picking station introduces a new feature into the landscape which is also large in scale and in terms of its visual impact. It is therefore relevant to consider any potential harm to the Green Belt. One of the stated aims of Green Belt policy is to protect against urban sprawl by maintaining the permanent openness of the landscape. Clearly this does not mean that no development is allowed but that the impacts of each proposal should be considered in light of the effect it would have on the openness.

Impact on Openness of the Green Belt

46. In considering the impact of the proposed development on the openness of the area it is relevant to consider the effects upon landscape and visual appearance of the vicinity.
47. The development is on the very edge of a SSSI and RAMSAR site, and also on the edge of Countryside Stewardship farms. As set out earlier in my report the site lays within national and local landscape designation areas. These designations recognise

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the predominantly flat, low-lying alluvial marsh and arable nature of the landscape; and the potentially intrusive nature of development pressures in and around major settlements with urban, industrial and recreational sites often highly visible within the low-lying marshes.

48. The applicant argues that Apex Business Park when considered as a whole contains a variety of permanent and temporary structures and in the wider context sits with the adjoining Hoo Railway Junction and the adjoining collection of industrial buildings, which now forms the Canal Road Industrial Estate. It is argued that the site is well screened from the open Green Belt by the railway embankment to the north and the adjoining industrial buildings within the Business Park. The site previously had numerous buildings and portacabins located on it and it is suggested that the proposals would tidy up the site in that respect.
49. It is also acknowledged that historically there has been industrial development at this location and currently a number of different uses occupy the existing buildings on site. It is recognised that the land to the north rises slightly and is covered in trees and as such provides a good level of screening when viewing the site from the north and a green backdrop to the structures when viewed from the south. Longer distance views from the south are over the Thames Estuary towards Tilbury and the port related development near Corringham on the Essex coast. However it is necessary to consider whether the proposed new development is more visible in the landscape and the potential impact upon the openness of the countryside here.
50. The erection of the trolley and picking station on site already introduces a large structure with a maximum height of 8 m with the picking station being 6.6 m for its length. The larger of the two original buildings which was removed from site had a maximum height of 5.6 m and was fairly representative of the relatively low rise nature of the old existing buildings on the industrial estate. At 12.02 m high and 20 m long (plus the clad wall section at 8 m high for 13 m in length) the proposed building would be more visible from the surrounding area.
51. Our Landscape advisor states close hand views have the potential to cause adverse impacts, but longer distance views, beyond 1km, are unlikely to be significantly adversely affected. The vegetation to the north of the site and along the railway would also filter and largely screen views from the north. Consideration has been given to impacts upon the AONB (3km to the south), from the nearby listed buildings, from within the Conservation Area and the public footpath running about 0.6km east of the site, St Mary's Churchyard and the Saxon Shore Way (1.6km to the north). It is generally concluded that with existing vegetation, the presence of pylons and the distant development on the skyline any impact upon landscape views are unlikely to be significant.
52. It is acknowledged that the proposed development would result in an intensification of the industrial estate activities, but this would be within the existing footprint of the estate. Therefore it is not considered that the impact upon the landscape character would be significant. A condition requiring approval of the external cladding of the building is recommended to assist with integrating the structure in to the landscape.

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53. Given the above considerations there would be some slight impact on the openness of the Green Belt because of the height of the building, although it is within the existing developed area. On that basis and on balance it is considered that the impact on openness is very slight adverse at the most.
54. In conclusion the proposal is inappropriate development, and although there is some impact on visual amenity, it is not considered, on balance, to significantly adversely affect the openness of the Green Belt. So whilst in principle inappropriate development is by definition harmful to the Green Belt, it is not considered that this proposal would fundamentally affect the openness given its containment within the existing industrial estate and considered along with the impacts of existing infrastructure. On balance, the proposed development does not compromise the functions and purpose of Green Belt designation.
55. As indicated above the guidance states, “...*inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very special circumstances*”. It goes on to advise, “*When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations*”. The weight given to the harm is significantly reduced by the conclusions above however it is still relevant to consider whether there are very special circumstances sufficient to over-ride Green Belt Policy.

Very Special Circumstances

56. Having considered whether the proposed development causes any other harm it is necessary to consider whether there are very special circumstances sufficient to justify over-riding Green Belt policy.
57. There is no comprehensive list of what are very special circumstances and it can comprise a number of circumstances. The Applicant initially promoted three criteria as being the very special circumstances as follows:
- There is a recognised need in the Minerals and Waste Local Plan for new waste management facilities to be developed in order that Kent can continue to demonstrate that it is maintaining net self-sufficiency in waste management capacity and the Plan recognises the importance of the current stock of permitted waste management facilities in maintaining self-sufficiency. It is considered that the benefits of improving recycling capacity at an existing waste management facility will deliver on both of these points.
 - The application site, as an existing permanent waste management facility, is safeguarded from other development by the Minerals and Waste Local Plan and it is likely the facility will have to close if the proposed improvements cannot be implemented.

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- It has been demonstrated that there are no suitable alternative sites available outside of the Green Belt. SLR (the Agent) has undertaken a site search of industrial land and buildings which are currently on the market within the area that the current waste management facility serves. The results of the search show that the industrial properties that are available are not suitable for the type of waste management development that is proposed and therefore there is a lack of alternative sites available outside of the Green Belt.
58. Essentially the first two points relate to the County Council's waste policy seeking to protect and safeguard existing waste management facilities. It is therefore appropriate to consider those specific policies.

Waste Policies

59. CSW1 states when considering waste development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework, National Planning Policy for Waste and the Waste Management Plan for England. Waste development that accords with the development plan should be approved without delay, unless material considerations indicate otherwise; any unacceptable adverse impacts should significantly and demonstrably outweigh the benefits.
60. CSW 6 states that planning permission will be granted for uses identified as appropriate in the Waste Sites Plan to meet the need identified in Policy CSW 7, however there are a number of criteria/ caveats, one of which categorically states that such proposals should not, "represent inappropriate development in the Green Belt". Policy DM4 seeks that waste proposals within the Green Belt be considered in light of their potential impacts and compliance with national policy and the NPPF.
61. CSW16 recognises that the current stock of waste management facilities are important to maintaining net self-sufficiency and the loss of annual capacity at permitted existing sites could have an adverse effect upon delivering the waste strategy. The policy states that sites that have permanent planning permission for waste management are safeguarded from being developed for non-waste management uses. Policy DM8 also seeks to protect existing waste development from other incompatible development. Policy DM 20 allows for ancillary development provided that there are environmental benefits in providing a close link with the existing site that outweigh the environmental impacts.
62. Certainly waste policy recognises the contribution existing facilities' make to maintaining net self-sufficiency, although none comment specifically on proposals to expand existing waste management within the permitted site boundaries. The quantity of waste to be handled at this site would not increase however the proposal seeks to improve the quality of the various waste streams for onward recycling which is to be supported. Planning permission was granted in 2010 to use the site as a waste transfer station, albeit in the Green Belt, and it is understandable that the Applicant would wish to locate new equipment on their existing site; however the scale of the proposed development and the ability of that site to accommodate the proposed new

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development must be taken into account. The fact that policy seeks to safeguard existing facilities does not mean that all proposals to expand those facilities will always be acceptable. It is wholly appropriate that the merits of the current proposals are considered afresh and potential impacts are considered against all relevant planning policy, not just those limited to protecting existing facilities. On that basis, whether general policy support for safeguarding existing waste management facilities' is sufficient as a very special circumstance on its own is not clear cut.

63. The third point the Applicant made in support of their very special circumstance is that there are no suitable alternative sites that lie outside of the Metropolitan Green Belt. It is acknowledged that the current site is within the Green Belt and therefore serves a market some of which also is within the Green Belt, which I accept. Whilst I do not consider a particularly robust examination of alternative sites has been made, I am mindful of the fact that this proposal is on a site with a permitted waste use and that the through-put is not to be increased. In this case, the applicant is proposing better facilities to increase recycling efficiencies and better working practices. On that basis I have no reason to disagree that a suitable site outside of the Green Belt would be available to the applicant.
64. Since first submission the applicant has also taken the opportunity to submit additional factors that are considered to demonstrate that very special circumstances exist, as follows:
- The site sits within an established industrial use as part of the wider Apex Industrial Estate.
 - The site already has an established waste use.
 - With the exception of the picking station, no new activities are proposed – it is accepted that the waste use would replace the earlier industrial use(s);
 - It is considered that the proposed development is a reuse of brownfield land, rather than a greenfield location, therefore it does not impact on key green belt principles;
 - The proposal is substantively similar to existing permitted waste use, with no material increase in overall floorspace with the exception of the replacement building which extends the height of building.
 - No changes to the throughput of the site are proposed however the development is focused on operational controls, efficient use of the waste resource and to meet the requirements of the extant waste permission(s);
 - A smaller like for like replacement of the building would open the potential for further issues with damage to the structure and limit the operations that could take place undercover;
 - The operational benefits of the new building meet the terms of sustainable development which seek to balance environmental, social and economic considerations;
 - The proposed development will help to drive waste further up the waste hierarchy by providing improved efficiencies and waste separation (greater separation, enabling appropriate recycling and reuse), contributing to the Kent's network of

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waste management facilities helping to manage material closer to its source, reducing miles travelled per tonne of waste by bulking up material;

- Represents a significant investment in improving the site and operations to meet modern standards, including in terms of development control and environmental permitting; and
- There would be a limited impact on the open character of the area due to the increased height of the building (which is supported by the conclusion set out in the submitted LVIA) however any impact would be outweighed by the very special circumstances outlined above.

65. This proposal is considered inappropriate development; however the harm to the Green Belt is limited by the general conclusions regarding the impact upon openness. The very special circumstances quoted by the Applicant and discussed above, individually would not in my opinion be sufficient to overcome significant harm. However it is recognised that this is an existing site which provides a useful waste management facility, of its type, close to the urban area of Gravesend. There is policy support in principle to safeguard existing facilities and the contribution they can make to the treatment of Kent's waste. The proposals seek to provide an improvement in the operation of the facility and the efficiency of sorting the various waste streams, all of which weigh in support of the proposals. On the basis of the above it is considered that collectively the very special circumstances cited by the applicant could be supported. I am satisfied, on balance, that any harm to the openness and function of the Green Belt could be outweighed by the benefits arising from the proposed development and that as such there are very special circumstances to justify an exception to Green Belt policy.
66. However it is also relevant to now consider other impacts from the proposed development to balance against these conclusions.

Highways Issues

67. This proposal seeks to increase the number of HGV movements from 24 (currently restricted by condition) to a maximum of 74 HGV movements per day. The applicant has been operating around this level of vehicle movements in breach of the condition for some time whilst these proposals have been considered. The applicant argues that the 24 HGV movements were never realistic in relation to the throughput of material allowed to be handled at the site. Whilst that may be the case, that is what they applied for at the time and it was on that basis that their application was considered.
68. Having confirmed that they do not propose any change to the 55,000 tpa limit on their current permission they are seeking to increase the HGV movements to a figure that they consider is reasonable in relation to that level of throughput. (It should be noted that their earlier withdrawn application which proposed increasing throughput to 75,000 tpa also proposed a higher increase up to a maximum of 104 HGV movements).
69. Significant local objection is raised to the increase in traffic, with many concerned about the suitability of the local roads to accommodate additional traffic. The Highways Officer has given detailed comment and his comments are reproduced in full

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earlier in my report. He concludes that the access onto Queens Farm Road has sufficient width and visibility for the type of use. The road itself whilst narrow in places has sufficient passing places and adequate visibility for the low level of use. The junction of Queens Farm Road with Lower Road meets highway standards in respect of layout and visibility.

70. He comments that Lower Road is subject to a 50 mph speed limit and is of adequate width for the traffic volume it carries. The traffic flows along this road in both directions towards Higham and towards Chalk are low and well below the road's theoretical capacity. Lower Road becomes Lower Higham Road through the built-up area of Chalk where the carriageway widens to 7.3 m, and has footway and street lighting facilities. Again traffic flows are low compared with the capacity. Both Queens Farm Road and Lower Road are considered to have low levels of traffic, confirmed by the surveys undertaken in September 2015, which essentially includes traffic levels as proposed (as already occurring). There are not considered to be any significant safety problems in terms of crash data.
71. He further comments that the proposal is likely to result in a maximum 74 two-way skip lorry movements per day. This is confirmed by a manual traffic count undertaken at the Queens Farm Road / Lower Road junction in January 2016 when movements in excess of the current permitted level were operating. The survey shows that the peak skip lorry movements did not occur at peak road network times (10:00 - 11:00 and 13:00 - 14:00) therefore the impact on the network is somewhat less than the "worst case". He concludes that there is no evidence that, even with the current operating level being similar to that applied for, there are any highway safety or congestion issues being experienced on the local road network. He suggests the submission of a lorry routing scheme may help mitigate the impact of the development on local communities and to ensure that vehicles do not make unnecessary journeys through the villages but use the major road network wherever possible. The applicant has also confirmed that they have trackers on all of their own vehicles and so are able to review routes taken on a daily basis.
72. It is recognised that it would be difficult to increase access by employees by sustainable means but acknowledges that car sharing and cycling are encouraged, including the provision of cycle spaces on the proposed layout.
73. It is concluded that whilst the increase in vehicle movements over the base traffic levels (including permitted movements) appears high in percentage terms (45% in Queens Farm Road and 40% / 19% in Lower Road to the West / East), the flows on both roads both in terms of skip lorry movements and background traffic are low in the first place. NPPF Paragraph 32 states that development should not be refused on transport grounds unless the cumulative impact is considered to be severe. In this instance, given the low levels of proposed movements (which already exist on the network) and the low background traffic on both Queens Farm Road and Lower Road and the lack of evidence of existing highway problems, it is considered the impact could not be considered to be severe. On this basis subject to condition securing submission of a lorry routing scheme (based upon the information contained in the Transport Assessment), there is no highway objection to the proposals.

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74. It is acknowledged that some of the concern regarding increases in skip lorries using the local highway network relate to the environmental impacts associated with these vehicles. Matters such as noise, smell and appearance are not highway impact issues but are matters which can be controlled by good management and maintenances on the part of the operator for the vehicles under his control. The Applicant has been made aware of these concerns and other matters and has responded promptly to any complaints raised with him.

Landscape and Visual Impact

75. The Landscape Officer's comments are widely discussed in relation to the impacts on the openness of the Green Belt section of my report and it is concluded that although finely balanced, the impacts are not considered sufficiently significant to affect openness. The proposal will result in a development more prominent in the landscape when viewed from close distance. The plant and new building will introduce development of greater height; however this is set against the backdrop of the existing tree screen on the embankment to the north. It is concluded that a condition requiring submission of the colour of the cladding for approval would aid visual integration and thus mitigate this impact to a sufficient extent.

Conservation Issues

76. The application site is located to the north east of the Queens Farm Conservation Area and within an area of Archaeological Potential. At its closest point the site is some 7 metres away from the boundary of the conservation area. However as the proposals are contained within the existing industrial estate and are generally located on the northern side of the estate there is limited direct impact upon the conservation area. The Conservation Officer applauds the reduction in the size of the building (from the initial submission) and the use of appropriate cladding materials recognises that the proposed building reflects the scale of existing buildings within the Queens Farm Complex.
77. The access route of the proposals passes through the historic farmstead which comprises the conservation area and the increased vehicle movements have the potential to have a detrimental impact upon it. It is acknowledged that the character could change from a rural lane to a frequently used industrial access; however it is already in use for a variety of industrial uses located at the Apex Business Park and therefore is unlikely to be significant change as a result of this proposal. The actual increase in overall traffic usage is not significant in highways terms.
78. Overall it is considered that the proposed development has the potential to have detrimental impact upon the character of the conservation area but subject to a condition requiring approval of the colour of the cladding the impact would not be so significant to warrant a refusal.

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79. In terms of archaeological impacts, a condition securing a watching brief for any significant groundworks at the site should safeguard against any detrimental impact to archaeological features.

Environmental Impacts

80. A number of objections have also been received from other uses of the industrial estate and their concerns relate to the operations on site and the environmental impacts upon the area. We have sought specific advice from our environmental consultants in relation to noise, dust and odour issue. The Environment Agency are responsible for the pollution control issues and the issuing of the waste permit for the site. As such they have no specific comment on the planning application as they are satisfied that any potential ground contamination issues have been addressed through the sealed hard surfacing of the site. They have stated they will continue to assess the permit conditions to ensure that the treatment of waste activity is contained appropriately.
81. Noise and Vibration – Collected waste is delivered to the site and tipped onto the floor in the waste reception area which is screened by the 7-8 metre high clad wall, before being pushed into the building. The hopper into which the waste is then tipped before transfer by conveyor to the trommel is contained within the proposed open ended building. As the material passes along the plant the fines are separated out and the remaining material passes through the enclosed picking cabins for further separation, although this largely outside of the building. The application was accompanied by a noise assessment which is considered to be in compliance with the requirements of the National Planning Policy Framework (NPPF), the Planning Practice Guidance to NPPF (PPGN) and BS 4142:2014 and its assumptions are considered sound. Consequently, the noise assessment considers that the noise levels from the development are acceptable and there is no requirement to recommend additional mitigation. Our noise advisors concur with this view and in line with the noise levels predicted in the assessment recommend the inclusion of the following noise condition:
- The noise levels from the site at Queens Farm House shall not exceed a rating level under BS 4142:2014 of 41dB $L_{AR,1hr}$. The noise levels from the site at any neighbouring commercial or industrial site shall not exceed 60 dB $L_{Aeq,1hr}$.
82. Further consideration is given to the potential noise issues associated with the additional HGV movements proposed. Given these movements would occur during the day and that noise levels associated with existing traffic (already at those levels) cause noise levels below the threshold of moderate nuisance this is considered acceptable in terms of noise. A condition restricting the number of HGV movements to 74 would ensure noise levels are controlled.
83. In order to avoid potential vibration issues at the neighbouring properties from the use of high weighted machinery, it is also recommended that a further condition be attached as follows:

20151192 (KCC/GR/0387/2015) - Improvement and enhancement of existing waste transfer site by erection of a replacement building to provide covered working area and ancillary site improvements together with retrospective provision for trommel, picking station and wall at Unit 4 Apex Business Park, Queens Farm Road, Shorne, Gravesend, Kent DA12 3HU

- Vibration levels generated by the site activities shall not exceed a VDV_{16h} of $0.8 \text{ ms}^{-1.75}$ when measured inside buildings of neighbouring properties. Groundborne noise generated by activities within the site shall not exceed 45 dB L_{Amax} (re. 2×10^{-5} Pa) when measured inside buildings of neighbouring properties. If access to the neighbouring sites is granted to investigate noise and/or vibration concerns, evidence of compliance with the conditions above shall be provided at the request of the County Planning Authority.
84. Air Quality – Dust and Odour – Given the sites relatively isolated location and with the absence of any highly sensitive receptors (resident, schools, hospitals etc.), it is considered the sensitivity of the area to dust soiling and human health impacts is low. The dust assessment report considered the risk of dust before mitigation to be medium and that together with the low sensitivity of the area concludes there to be an overall low risk of adverse dust impact. This is considered a reasonable conclusion given the nature of the material and the location of the facility.
85. The assessment goes on to state that mitigation measures are inherent in the design of the semi enclosed nature of the operations, which is not entirely the case. In addition the tipping of the waste in the open and the movement of the material into the building has the potential for dust release. However it is considered the orientation of the site to other receptors is favourable as sections of the plant are to the northern leese of the newly proposed building and screen walling which would offer some protection from the prevailing wind which together with the proposed sprinkler system would adequately control dust. However no specific measures are suggested for the material reception area. On that basis it is suggested that a condition requiring the submission of a Dust Management Plan be attached to any permission granted. This should detail how dust would be controlled at each stage of the handling of the waste materials at the site and for vehicles leaving the site. The proposed dust suppression system could be one such measure.
86. The vast majority of material received at site is construction, demolition or excavation material which typically by its nature would not give rise to odour. However it is acknowledged that a small quantity of green waste may also arrive at site. Some of this could give rise to odour during processing and transfer unless it is appropriately handled. Whilst individual conditions could set specific measures to be taken to address odour it is considered that the submission of an Odour Management Plan assessing risk, proposing mitigation and detailing actions to cover all potential nuisance from odour.
87. Given the distance of the designated nature conservation areas and the conclusions above there is unlikely to be any detrimental impact on these areas. The County Council's Ecologist has no objection to the proposals and is satisfied that the proposals adequately mitigate potential environmental impacts.

Residential Amenity

88. The application site is located on an established industrial estate and has planning permission for the use as a waste transfer station. The closest residential properties

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are some distance away and as such local residents would be most affected by the additional vehicle movements to and from the application site. Indeed the majority of objection to the proposal relates to the noise, vibration, litter, dust and debris impacts associated with the increase in HGV movements. However as set out above, the increase in the level of traffic on the highway network is not considered excessive and conditions controlling numbers of vehicles, hours of operation, routing and managing their impacts upon the highway can be attached to any planning permission granted. Therefore it is considered that there would be no significant adverse impacts upon residential amenity.

89. The application has arisen out of the need to provide a replacement building to enclose waste sorting activities and to provide modern equipment to improve the efficiency of waste sorting. As set out above conditions could be attached to ensure that the waste transfer station operations would mitigate dust, noise, vibration and odour. Additional conditions could ensure appropriate litter control and lighting details for the site. In addition as set out earlier in my report the site would operate under a permit issued by the Environment Agency, which protect the vicinity from adverse pollution impacts.

Other Issues

90. The application site is located within the safeguarding area for High Speed 1 (Channel Tunnel Rail Link). However HS1 Limited has raised no objection to the application.
91. The application site is located within Flood Zones 2 and 3. However the Environment Agency has raised no objection to the proposed development in terms of flood risk.
92. Gravesham Borough Council's Scientific Officer has requested a watching brief soil contamination condition, given the previous industrial nature of the site and the proximity of the historic landfill site at Higham. It is not expected there will be significant groundworks associated with the construction of the proposed building however a condition would highlight any potential contamination impacts.

Conclusions

93. The use of this former industrial site as a waste transfer station was permitted in 2010 with a throughput of 55,000 tpa and a restriction of 24 HGV movements per day. Waste sorting activities took place within 2 low level buildings with a combined floorspace of approximately 514 square metres, using a 360 excavator. These buildings were taken down following damage to one of them and waste sorting has been taking place in the open since. There were a number of ancillary portacabins on the site. The hours of operation at the site are 0700-1800 hrs Monday-Friday, and 0700-13.30 on Saturdays with no working on Sundays or Bank Holidays.
94. A new administration building has been built and was granted permission subject to the removal of the portacabins.

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95. In principle there is continued policy support for waste management facilities to be located within existing industrial estates; the use of this site within the Green Belt for such purposes has already been established. The facility is well located to serve the urban area of Gravesend and beyond. It is now proposed that a new waste handling building and trommel and picking station are developed to improve the efficiency of waste sorting and to provide a better working environment for the operatives. In addition it is proposed to retain the vehicle workshop building at the eastern end of the site. The throughput of material would not change and the hours of operation would remain the same. It is proposed to amend the level of traffic from that originally restricted by condition (24 HGV movements per day) to a maximum of 74 HGV movements per day, a level at which the site has been operating for at least the last 12 months while this application and the previously withdrawn one were being considered (albeit in breach of the condition).
96. It is proposed to continue to operate at 55,000tpa of waste throughput. The issues are therefore mainly around whether the proposed new building and plant affect the openness of the Green Belt and are acceptable in visual impact and amenity terms; and whether the increases of traffic movements is acceptable in this location.
97. It is concluded that the impact upon the Green Belt, whilst finely balanced, does not affect its openness and thus the principle aims of protection; and the increase in visual impact is offset by the existing topography and landscape screening. I am advised that with appropriate worded conditions the amenity impacts of the operations could be successfully mitigated. The increase in traffic whilst high in percentage terms over and above the level currently restricted by condition is not considered high in numbers given the relatively low level of use of the local highway network. There is not considered to be a highway capacity or safety issue. Given that there are no significant impacts from the proposed development and that there are very special circumstances to weigh against any harm caused by the development, I conclude there is sufficient reason to justify an exception to Green Belt policy.
98. In my view this waste related development is sustainable and there are no material planning considerations that indicate that the conclusion should be made otherwise. I therefore recommend that the application be granted subject to conditions and an informative.

Referral

99. The Town and Country Planning (Consultation) (England) Direction 2009 requires certain types of Green Belt development to be referred to the Secretary of State if the Local Authority is minded to grant planning permission. This applies to inappropriate development which consists of or includes –
- (a) the provision of a building where the floorspace to be created by the development is 1,000 square metres or more; or
- (b) any other development which, by reason of its scale or nature or location, would have a significant impact on the openness of the Green Belt.

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100. Whilst the proposed building does not exceed the floorspace criteria, the issue of impact on the openness of the Green Belt is finely balanced; however it is concluded that that the proposal would not have a significant impact. On that basis it is not necessary to refer the application to the Secretary of State.

Recommendation

101. I RECOMMEND that PLANNING PERMISSION BE GRANTED SUBJECT TO the imposition of conditions covering (amongst other matters) the following:

- In accordance with approved drawings,
- Restriction of HGV movements to daily maximum of 74,
- Hours of operation 0700-1800 Monday – Friday, 0700-1300 Saturdays, no working on Sundays and Bank Holidays.
- Condition restricting noise levels at Queens Farm House and neighbouring industrial properties (as set out in paragraph 78),
- Condition restricting vibration levels at neighbouring industrial properties (as set out in paragraph 80),
- Maintenance of plant and equipment,
- Submission of Dust Management Plan for all stages of waste handling and for vehicles leaving the site, including wheel and chassis cleaning and containment of waste loads,
- Submission of an Odour Management Plan assessing risk, proposing mitigation and detailing actions to address nuisance,
- Scheme detailing proposed materials to be used on the building, including colour of cladding,
- Submission of a lorry routeing scheme (reflecting the information in the TA),
- Archaeological watching brief (if significant groundworks are required for the construction of the building).
- Contaminated Land watching brief (if significant groundworks are required for the construction of the building)

102. I FURTHER RECOMMEND that AN INFORMATIVE be added to encourage the operator to set up a forum for dialogue with the local community.

Case Officer: Andrea Hopkins

Tel. no: 03000 413334

Background Documents: see section heading

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SECTION D
DEVELOPMENT TO BE CARRIED OUT BY THE COUNTY COUNCIL

Background Documents: the deposited documents; views and representations received as referred to in the reports and included in the development proposals dossier for each case; and other documents as might be additionally indicated.

Item D1

Relocation of existing temporary classroom to the front of the school from the rear at Wilmington Grammar School for Girls, Parsons Lane, Wilmington – DA/16/00800/CPO (KCC/DA/0091/2016)

A report by Head of Planning Applications Group to Planning Applications Committee on 14th September 2016.

Application by Kent County Council Property and Infrastructure Support for the relocation of an existing temporary classroom to the front of the school from the rear at Wilmington Grammar School for Girls, Parsons Lane, Wilmington – DA/16/00800/CPO (KCC/DA/0091/2016).

Recommendation: Permission be granted subject to conditions.

Local Member: Mrs Ann Allen

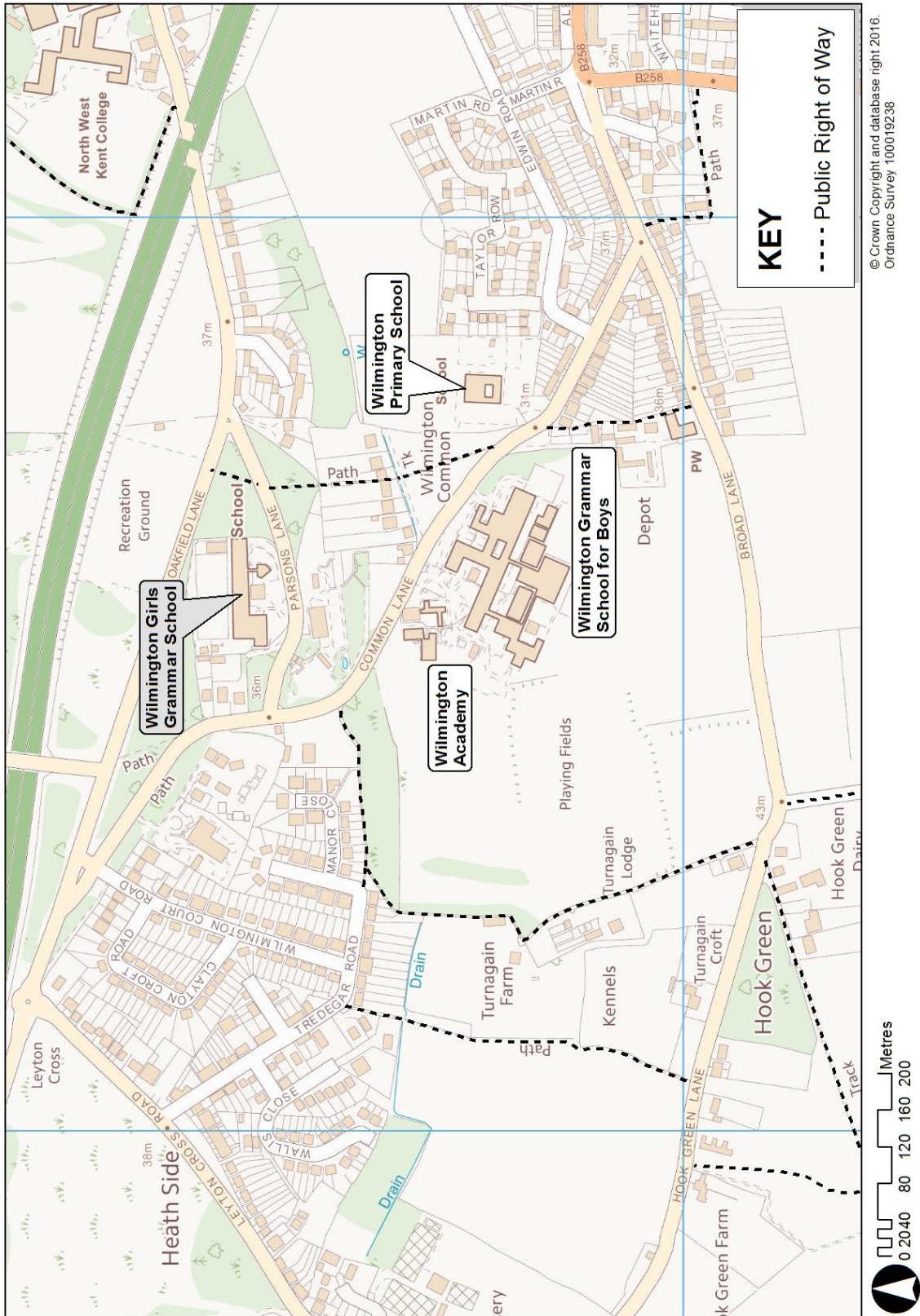
Classification: Unrestricted

Site

1. Wilmington Grammar School for Girls (WGSG) is located in Parsons Lane in Wilmington, which lies within the Metropolitan Green Belt. The school is located on both sides of the lane – the main buildings are on the northern side, with the Manor House and more undeveloped land being located on the southern side of the road. The Grange, on the northern side of the lane is an old two and a half/three storey yellow brick and tiled building with pitched roofs. Sitting behind and alongside this is a 1960's flat roof two and three storey building which extends across the site frontage which has cream rendered panels and white windows in a uniform pattern. A new three storey curved building has recently been added at the eastern edge of the site, which is constructed with yellow brickwork and dark grey panels. The ground floor for this extension is set down at a lower level than the rest of the site. To the rear of the buildings is a series of hard court sports pitches, enclosed with wire mesh fencing and at the eastern end of the site at the rear are two existing modular/temporary classrooms. One of these buildings was granted planning permission in 2003 and the other was placed on site temporarily during the construction of the three storey music and teaching block granted permission by Dartford Borough Council in 2014.
2. The rear of the school is well treed and screened from wider views, and Oakfield Lane runs along the rear of the site. To the front of the school buildings is an area of parking, and the site is enclosed along the road frontage with green roll top metal fencing, with some established hedging in places, and mature trees surrounding the built form. At the western end of the school site is a narrow lane which provides access to a scattering of residential properties.
3. Parsons Lane is accessed from Common Lane at its western end and runs eastwards until its junction with Oakfield Lane at the other end. At the Common Lane end of Parsons Lane, traffic is two way. Outside the main entrance to the school, the road is 'traffic calmed' and at this point the road effectively becomes one way, allowing traffic to

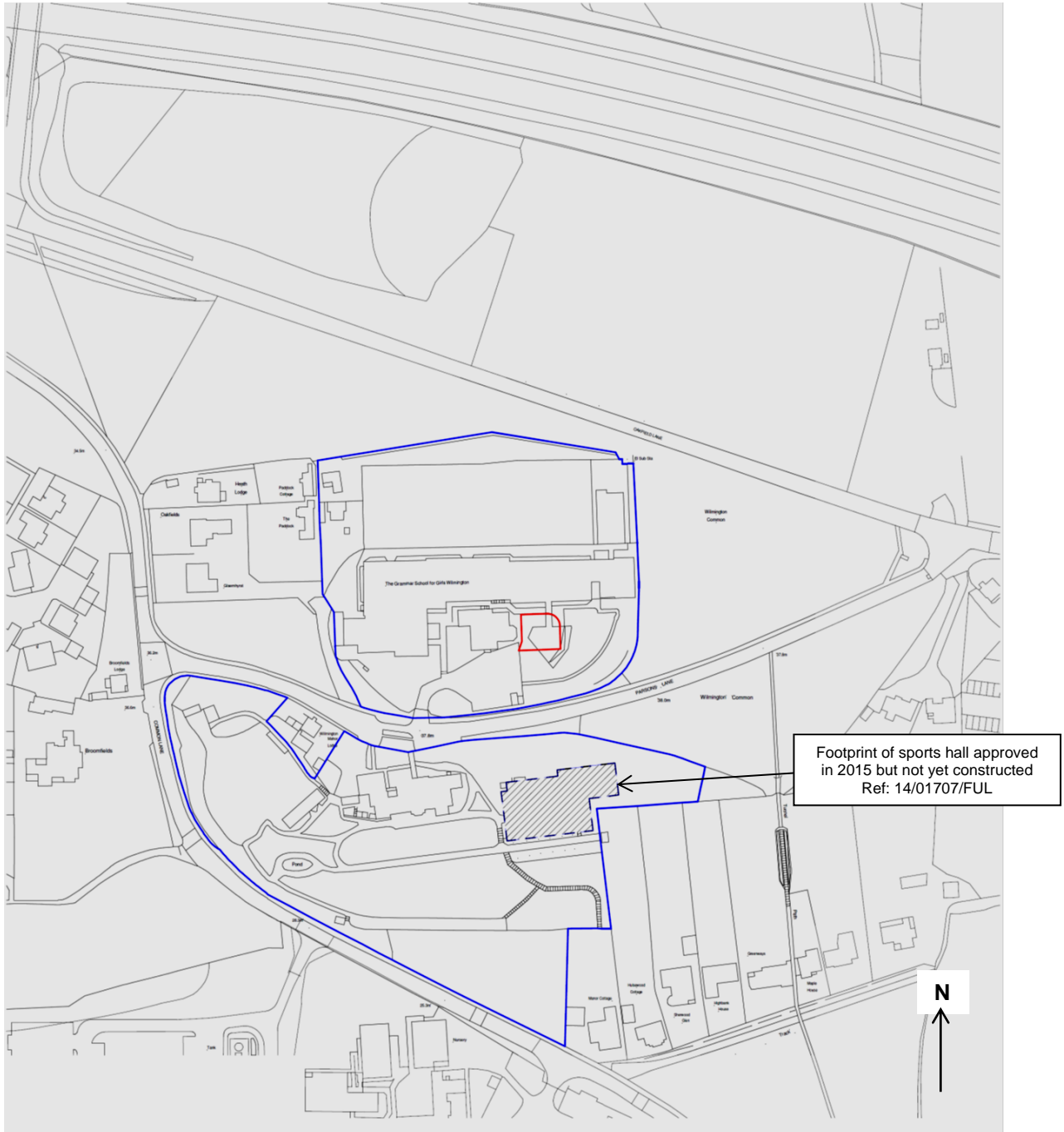
Relocation of existing temporary classroom to the front of the school from the rear at Wilmington Grammar School for Girls – DA/16/00800/CPO (KCC/DA/0091/2016)

General Location Plan



Relocation of existing temporary classroom to the front of the school from the rear at Wilmington Grammar School for Girls – DA/16/00800/CPO (KCC/DA/0091/2016)

Site Location Plan



Relocation of existing temporary classroom to the front of the school from the rear at Wilmington Grammar School for Girls – DA/16/00800/CPO (KCC/DA/0091/2016)

Proposed Siting of Temporary Classroom

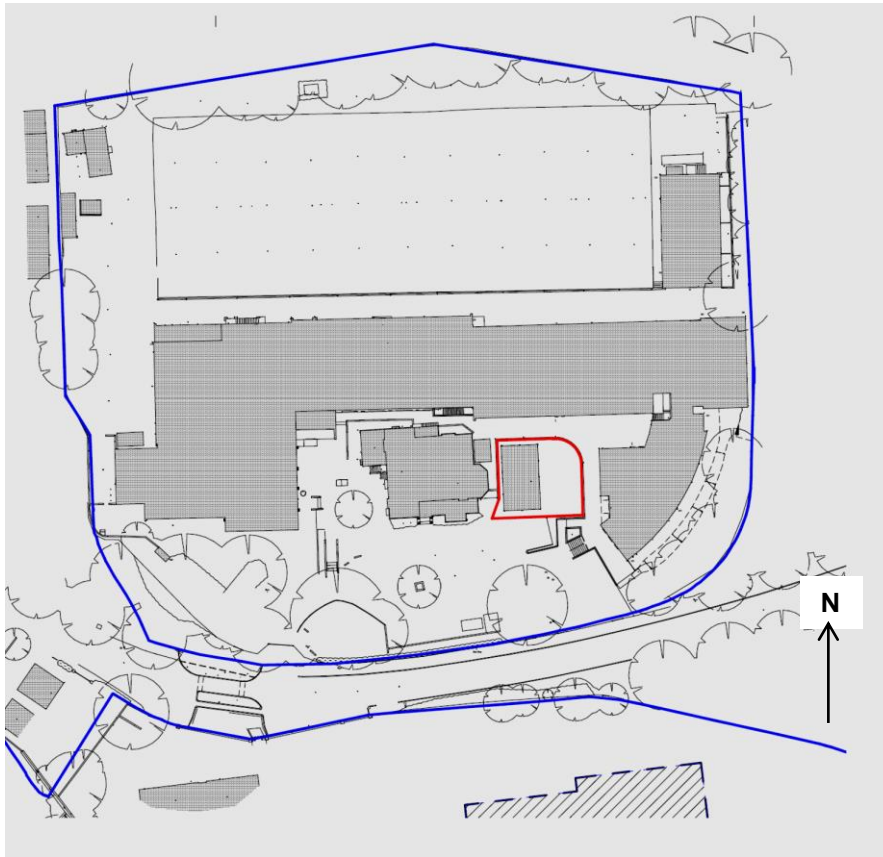


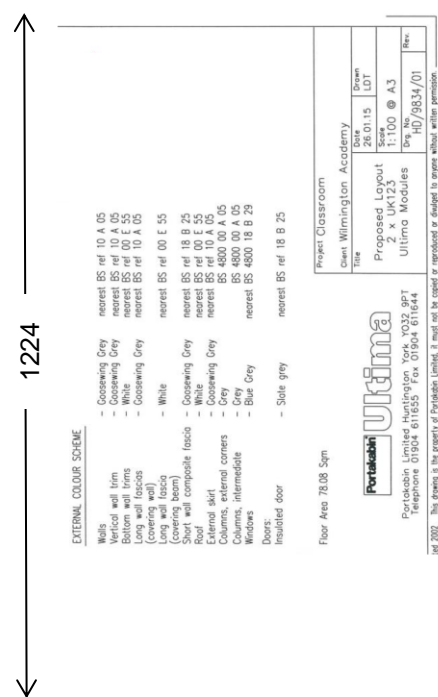
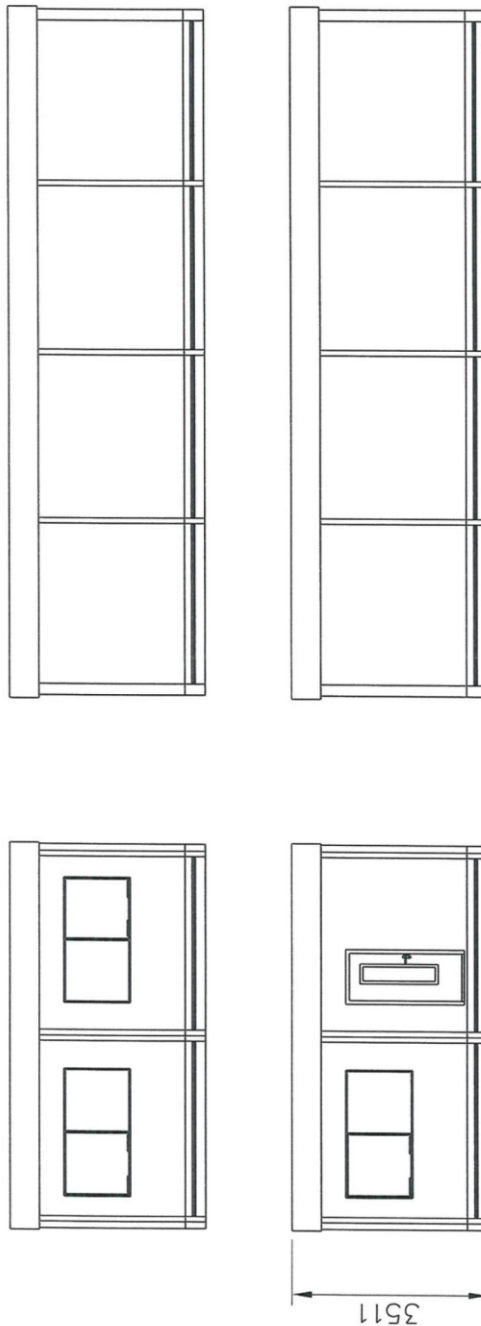
Image of temporary classroom in proposed Location



Relocation of existing temporary classroom to the front of the school from the rear at Wilmington Grammar School for Girls – DA/16/00800/CPO (KCC/DA/0091/2016)

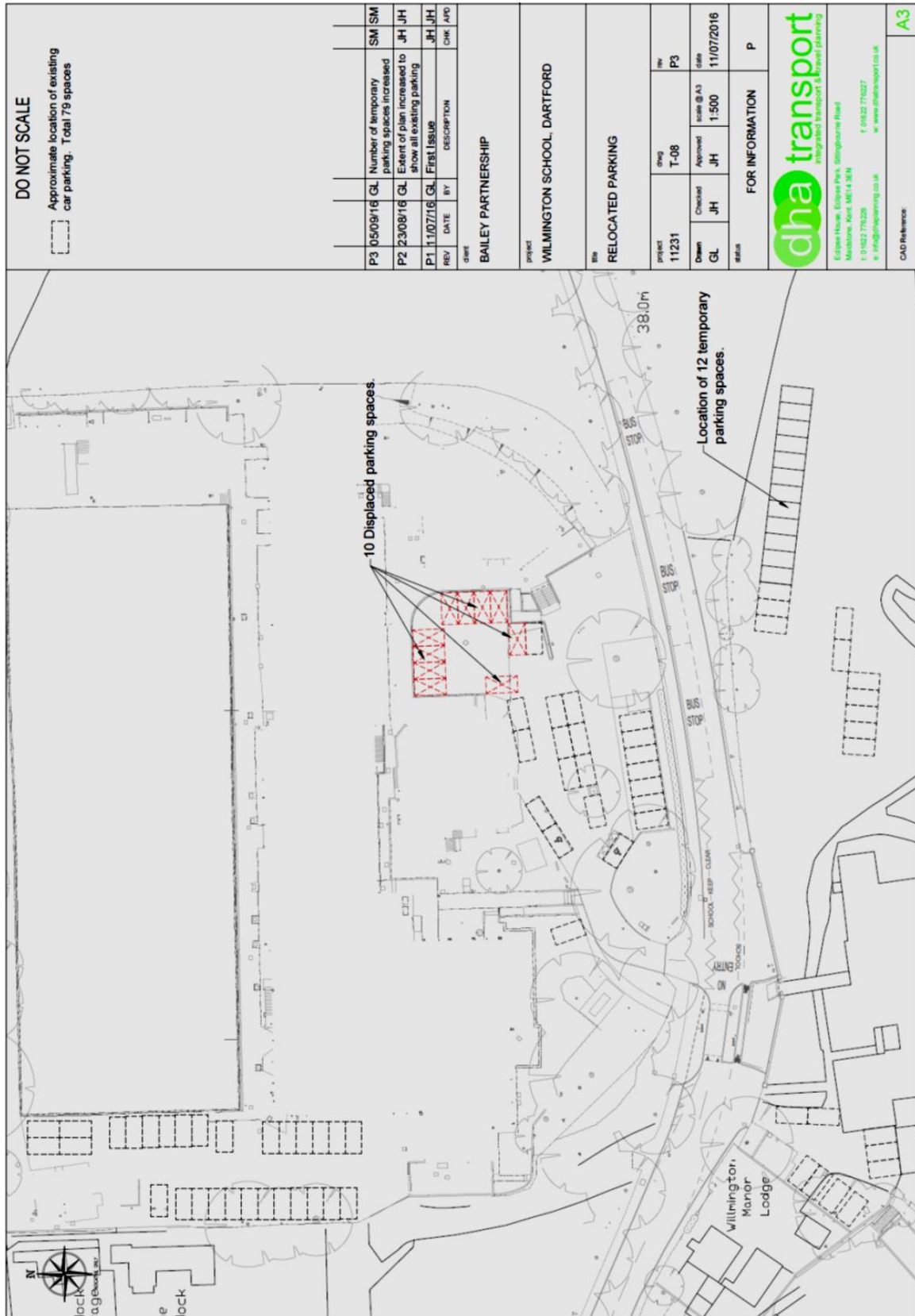
Proposed Elevations


Received - 25 April 2016
Planning Applications Group



Relocation of existing temporary classroom to the front of the school from the rear at Wilmington Grammar School for Girls – DA/16/00800/CPO (KCC/DA/0091/2016)

Location of Existing and Relocated Parking Spaces



DO NOT SCALE		Approximate location of existing car parking. Total 79 spaces			
P3	05/09/16	GL	Number of temporary parking spaces increased	SM	SM
P2	23/08/16	GL	Extent of plan increased to show all existing parking	JH	JH
P1	11/07/16	GL	First Issue	JH	JH
REV	DATE	BY	DESCRIPTION	CHK	APP
client BAILEY PARTNERSHIP					
project WILMINGTON SCHOOL, DARTFORD					
site RELOCATED PARKING					
project	11231	drawn	T-08	rev	P3
Drawn	GL	Checked	JH	scale @ A3	1:500
status	FOR INFORMATION		date	11/07/2016	
 dha transport integrated transport & travel planning Ecton House, Ecton Park, Stoughton Road Mansfield, Notts, MK14 3EN T: 01623 771225 E: info@dha-transport.co.uk W: www.dha-transport.co.uk					
CAD Reference					A3

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travel from west to east only, with no access back past this pinch point towards Common Lane, and no entry to Parsons Lane from Oakfield Lane either. There are zig-zag 'keep clear' markings outside the school entrance on both sides of the lane, with 'on road' bus stops marked along the remainder of the open frontage of the school.

4. WGSG is located in close proximity to a number of other education facilities. Wilmington Day Nursery and Pre-School, Wilmington Academy, Wilmington Grammar School for Boys and Wilmington Primary School are all located to the south of WGSG and accessed from Common Lane.

Background

5. This application was submitted at the same time as a separate application seeking permission for a two storey extension to provide additional teaching accommodation for another form of entry at the school, expanding it from 4FE to 5FE (KCC/DA/0090/2016). This application is still under consideration, due to concerns over the wider traffic, highway and parking issues surrounding all the education establishments located in this area, and the combined effect of the school expansions.
6. This application has been submitted separately as it relates to the relocation of an existing building which was placed on site temporarily during the construction of the three storey music and teaching block granted permission by Dartford Borough Council in 2014. However the temporary building does not benefit from planning permission. There are two strands to the School's wish to relocate this temporary building. The first is that if the two storey extension referred to above were to gain approval, it would be constructed in the location of the current siting of the temporary building and as such it would need to be relocated to allow this development to proceed. However, in addition to this, WGSG has been asked to accept an additional 20 pupils this September (2016) as a bulge intake, for which it would need to use the existing temporary classroom on site. Given that the temporary classroom is in a relatively inaccessible location where it is currently sited, the school wish to relocate the temporary building anyway, to the proposed more useable location, but still for a temporary period only. It should otherwise have been removed from the site or planning permission sought for its retention in that location.

Recent Site History

7. There have been a number of planning applications at the site determined by Kent County Council and more recently by Dartford Borough Council, since the school took on academy status in 2011.

Applications approved by Kent County Council

Application Reference	Description	Decision
DA/02/1010	Erection of 2 no. prefabricated classroom buildings – single storey	Approved 12/12/2002
DA/03/293	Renewal of temporary permission for 2 no. mobile classroom buildings which were the subject of two separate applications DA/93/394 and DA/94/292	Approved 18/06/2003

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DA/03/628	Erection of a single storey permanent modular building as a Mathematics Centre	Approved 09/09/2003
DA/05/929	Erection of new 4 classroom teaching block together with new lift, toilets and ancillary accommodation, together with alterations to the existing external escape stair and associated external works	Approved 13/12/2005
DA/06/330	Erection of new 8 classroom teaching block, together with seminar room, new lift, toilets and ancillary accommodation, along with a pitched roof to existing school building	Approved 01/06/2006
DA/07/1120	Formation of two pedestrian entrances, pupil waiting area and car parking modifications (including extension of existing car park at the north-west corner of the Grange) associated with the school travel plan.	Approved 17/01/2008
DA/08/883	Erection of aluminium solar shading to three storeys, to the south facade of the main teaching block.	Approved 22/07/2008

Applications approved by Dartford Borough Council

Application Reference	Description	Decision
12/00616/FUL	Removal of existing panelling and windows and provision of replacement windows system and new cladding	Approved 26/07/2012
14/00709/FUL	Demolition of existing music block, removal of mobile classrooms and erection of three storey music and teaching block and extension of existing car park with associated landscaping	Approved 12/08/2014
14/01707/FUL	Erection of new sports hall	Approved 05/06/2015
15/01202/COU	Change of use of abandoned building in school grounds to Use Class D1 (education)	Approved 24/09/2015

Proposal

8. The application seeks permission to relocate a single temporary classroom building from its current position to the rear of the school, and site it at the front of the school for a temporary period. The classroom would be re-sited in front of the three storey flat roof teaching block (and to the east of The Grange) on an area currently used for car parking. This parking area was laid out as part of the works associated with the construction of the three storey music extension approved by Dartford BC in 2014. Due to the partially raised nature of the existing modular building, it would require the construction of steps and a ramped access to the front of the building. The external appearance would remain as existing, with grey coloured walls and trims, and dark grey double glazed windows and doors.
9. The siting of the temporary classroom in this location would result in the displacement of 10 parking spaces and it is proposed that these would be relocated to the southern side

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of Parsons Lane; two additional spaces are also to be provided to meet the current staff parking standards for the proposed accommodation. There is currently space to accommodate the parking here as the sports hall approved in 2015 has not been constructed yet. The current parking in this location is informal and not laid out with lined car parking spaces.

Planning Policy

10. The most relevant Government Guidance and Development Plan Policies summarised below are pertinent to the consideration of this application:

- (i) **National Planning Policy Framework (NPPF)** March 2012 and the **National Planning Policy Guidance** (March 2014), sets out the Government’s planning policy guidance for England, at the heart of which is a presumption in favour of sustainable development. The guidance is a material consideration for the determination of planning applications but does not change the statutory status of the development plan which remains the starting point for decision making. However the weight given to development plan policies will depend on their consistency with the NPPF (the closer the policies in the development plan to the policies in the NPPF, the greater the weight that may be given).

In determining applications the NPPF states that local planning authorities should look for solutions rather than problems, and decision takers at every level should seek to approve applications for sustainable development where possible.

In terms of delivering sustainable development in relation to this development proposal, the NPPF guidance and objectives covering the following matters are of particular relevance:

- Consideration of whether the opportunities for sustainable transport have been taken up and safe and suitable access to the site can be achieved for all people;
- Achieving the requirement for high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
- That the development has taken into account the importance of protecting the Green Belt, assessed the development against the exceptions provided and provided a case for any very exceptional circumstances;
- The great importance that the Government attaches to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities, and that great weight should be given to the need to create, expand or alter schools.

- (ii) **Policy Statement – Planning for Schools Development** (15 August 2011) which sets out the Government’s commitment to support the development of state-funded schools and their delivery through the planning system.

- (iii) The adopted **1995 Dartford Borough Council Local Plan (Saved Policies September 2011)**:

Policy B1 Development proposals should be appropriate for the location and should not have a detrimental amenity impact on the local area. A high

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standard of design should be implemented in proposals with layout, materials, adequate infrastructure, access and parking taken into consideration

Policy S4 There is a presumption against development in the Metropolitan Green Belt, as defined in the Local Plan; continued protection will be given to the countryside and its amenity value and recreation potential will be enhanced.

Policy S6 Development proposals should conserve and improve the existing built environment and a high quality and standard of design shall be achieved in new development.

Policy T19 Development proposals should be appropriately related to the highway network and not generate volumes of traffic in excess of the capacity of the highway network.

Policy T23 Development proposals should include adequate off-street parking facilities.

Policy T27 Development proposals shall make adequate provision for pedestrians.

(iv) Dartford Borough Core Strategy (2011)

Policy CS21 Community Services: Ensure the effective provision of community services.

Policy CS13 Green Belt: Seeks to resist inappropriate development within the Green Belt, in accordance with the NPPF.

Policy CS15 Managing Transport Demand: Pledges support for minimising the need to travel and minimising car use, whilst making effective use of the transport network. Travel plans will be required for all significant traffic generating development to ensure more sustainable modes of transport are pursued. Kent County Council's parking standards will be applied.

(v) Dartford Development Policies Plan (December 2015) (This document was submitted to the Planning Inspectorate in June 2016 and an Examination is due to commence in October 2016, with the plan expected to be adopted by Dartford BC towards the end of 2016 or early 2017.)

Policy DP1 Presumption in Favour of Sustainable Development: States that the Plan is written in accordance with national objectives to deliver sustainable development. A positive approach to considering development proposals will be had, reflecting the presumption in favour of sustainable development contained in the NPPF and the development needs of the Borough set out in the Core Strategy.

Policy DP2 Good Design in Dartford: Development will only be permitted where

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it satisfies the locally specific criteria for good design in the Borough by (a) reinforcing and enhancing localities to create high quality places, (b) ensuring heritage assets are retained, re-used and respected, (c) facilitating a sense of place through a mix of uses and careful design, (d) providing clear pedestrian and cycle linkages and permeability, active frontages and a mix of buildings and spaces. Provides further advice about determining planning applications in relation to scale, massing, form, materials, Conservation Areas and areas of heritage sensitivity, inclusive, safe and accessible places, management of natural resources and flood alleviation, and appropriate signage and advertisements.

Policy DP3 Transport Impacts of Development: Development will only be permitted where it is appropriately located and makes suitable provision to minimise and manage the arising transport impacts, in line with Core Strategy Policies. Localised residual impacts on the highway network should be addressed by well-designed off site-transport measures and adverse impacts on residential amenity or the environment must be minimised. Development will not be permitted where the localised residual impacts from the development, on its own or in combination with other planned development in the area, result in severe impacts on one or more of the following: (a) road traffic congestion and air quality (b) safety of pedestrians, cyclist and other road users and (c) excessive pressure for on-street parking.

Policy DP5 Environmental and Amenity Protection: Development will only be permitted where it does not result in unacceptable material impacts, and consideration must be given to potential amenity/safety factors such as traffic, access and parking, anti-social behaviour and littering, and intensity of use (amongst other matters).

Policy DP22 Green Belt in the Borough: Sets out 12 aspects against which development in the Green Belt will be assessed, including criteria to assess development considered as potentially not inappropriate by the NPPF; those developments that support Core Strategy Policy CS13; the re-use of existing permitted permanent buildings; taking account of the character and scale of existing buildings; criteria relating to extensions to buildings or infilling of previously developed sites; the replacement of buildings; ensuring no loss of the best and most versatile agricultural land; criteria for proposals for farm diversification; the use of land for horses or the erection of stables; outdoor sports and recreation uses; and the infrastructure required for such uses.

Consultations

11. **Dartford Borough Council** raises an objection to the application as it considers the siting of the classroom at the front of the site would be intrusive and incongruous at the front of the building, and out of character with and unsympathetic to the existing taller school buildings. Its prominent location would make it highly visible and exacerbate its awkward appearance within the street scene. They suggest it could instead be relocated to the area to the west of the hard surfaced ball courts at the rear of the

Relocation of existing temporary classroom to the front of the school from the rear at Wilmington Grammar School for Girls – DA/16/00800/CPO (KCC/DA/0091/2016)

building. They agree the additional 10 parking spaces would be acceptable, providing the applicants can demonstrate that the new spaces would be additions to the existing parking on site.

Wilmington Parish Council objects to the application. In relation to both this application and the two storey extension application they state that whilst they accept that each application must be treated on merit they urge the County Council to take an overview of all the current plans/proposals that are either under current consideration or have already been approved in respect of Wilmington Academy, Wilmington Grammar School for Girls, Wilmington Grammar School for Boys, Wilmington Community Primary School and the Nursery all of which are in close proximity. They state that taken as a whole the proposals for the Grammar School and Academy produce an extreme overdevelopment that is detrimental to the character of the area and which, due to highway concerns, have serious safety implications.

In further correspondence they also state that they consider it would make more sense for the former Rowhill School to be used as a 'satellite' to the existing schools and that this should be considered as an option for either Wilmington Academy or Wilmington Grammar School for Girls.

KCC Highways and Transportation Officer initially sought clarification from the applicant as to where the 10 displaced parking spaces would be relocated to and how they would be accessed, and where the existing parking spaces are located. Also, required that two additional parking spaces be provided to meet the current staff parking standards for the proposed accommodation, taking into account that it does not currently benefit from planning permission. Following receipt of the requested information, and the submission of the School Travel Plan he has stated that there is no objection to the application provided the 12 parking spaces to be provided south of Parsons Lane are clearly marked out on the ground with pegs or permanent markers and conditioned to be retained for the period the temporary classroom is sited in the proposed location at the front of the site. In addition, that upon removal of the temporary classroom the existing ten parking spaces are to be reinstated.

Local Member

12. The local County Member, Mrs Ann Allen, was notified of the application on 19th May 2016.
13. The two Dartford Borough Council Members for the ward of Wilmington, Cllr Eddy Lampkin and Cllr Derek Hunnisett, have raised objection and concern regarding the proposal and have expressed their full support for the views of Wilmington Parish Council, Wilmington Safer Streets, and local residents.

Publicity

14. This application was publicised by the posting of a site notice outside the school. At the same time the application for the permanent 2 storey extension was also received and advertised by the posting of site notices, an advertisement in the local newspaper, and the individual notification of 11 residential properties surrounding the site.

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Representations

15. In response to the publicity for this application, 4 letters of representation were received from 3 properties. In addition 9 separate representations were also received from the community based campaign group Wilmington Safer Streets, who represent over 450 households in Wilmington, however these on the whole relate to the application for the permanent two storey extension and the impact the expansion of this school, in conjunction with the proposals to expand Wilmington Academy, would have on the already congested road network surrounding the schools in Wilmington.

The comments pertinent to this scheme are summarised below.

- Concern raised as to why this application was submitted separately to the main application;
- Unless the extension is approved there is no need to relocate the temporary building to the front of the site;
- If approved the length of time the temporary building is allowed to remain should be included.

The representations submitted by Wilmington Safer Streets are substantial and as such the most recent response, which I consider to comprehensively combine all of the earlier comments, has been appended to this report, for clarity and completeness. The Parish Council has also registered its support for these representations.

Discussion

16. In considering this proposal regard must be had to the Development Plan Policies outlined in paragraph 10 above. Section 38(6) of the Planning and Compulsory Purchase Act (2004) states that applications must be determined in accordance with the Development Plan, unless material considerations indicate otherwise. Therefore the proposal needs to be considered in the context of the Development Plan Policies, Government Guidance and other material planning considerations arising from consultation and publicity. In my opinion, the key material planning considerations in this particular case are the carrying out of development within the Green Belt; the principle of using and relocating the existing temporary classroom within the school grounds; the siting and design impact of the relocated classroom; and the displacement of 10 parking spaces that would result from siting the building in this location.

Carrying out development within the Green Belt

17. Wilmington Grammar School for Girls is located within the Green Belt. The fundamental aim of the Green Belt policy, as set out in the NPPF paragraph 79, is to prevent urban sprawl by keeping land permanently open, and in paragraph 80 the 5 purposes are set out as follows:
- a. to check the unrestricted sprawl of large built up areas;
 - b. to prevent neighbouring towns merging into one another;
 - c. to assist in safeguarding the countryside from encroachment;
 - d. to preserve the setting and special character of historic towns; and

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- e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
18. In support of the planning application, the applicants submitted a Green Belt Policy Statement, which considered whether the relocation of the temporary classroom would conflict with the aims of the Green Belt Policy, having taken into account the exceptions listed in paragraphs 89 and 90 of the NPPF, and the aims of Policy S4 of the Saved Local Plan, CS13 of the Core Strategy and Policy DP22 of the emerging Dartford Development Policies Plan.
19. Exceptions which may not be considered inappropriate in Green Belt Policy terms include limited extensions and replacement buildings, new building for agriculture, woodland and facilities for outdoor sports and recreation, new buildings at cemeteries, limited infilling in villages in the Green Belt, limited affordable housing for local community needs, and limited infilling in or redevelopment of previously developed sites. The extension of buildings, provided they are of limited size, may not be inappropriate in the Green Belt; and replacement buildings need not be inappropriate provided that the replacement is not materially larger than the building it replaces, and the open character of the Green Belt is maintained.
20. In its proposed location the temporary classroom would be in very close proximity to the existing built form of the school and sited in a position where it would consolidate this built form. The school site itself has an urban feel given the range of large school buildings on site, and the relocated temporary classroom would be within the hard surfaced area and seen against the backdrop of the existing school. Because of this it is considered that it would not conflict with the main aim of the Green Belt Policy which is to prevent urban sprawl and maintain the open character of the designated Green Belt. Furthermore, the building is only being applied to be relocated for a temporary period, and in the long term would be removed from the site, thus causing no lasting impact on the wider setting of the area and the openness of the wider Green Belt itself.
21. Given these factors it is considered that the proposed location of the temporary building would not conflict with the aims of the Green Belt policies set out in the NPPF, the Saved Local Plan, Core Strategy and the emerging Dartford Development Policies Plan.

Principle of use of temporary classroom

22. As stated above the temporary classroom is already on the school site, and is currently situated to the rear of the main buildings and in the north-east corner of the school site, close to its boundary with Oakfield Lane; although it does not benefit from planning permission, as referred to in paragraph (6) above. In this location access to the classroom is somewhat limited, due to the position of the adjacent modular building and the fenced hard ball courts which are located to the south and west of the building respectively.
23. In their supporting statement, and as set out in paragraph 6 above, the applicants have two reasons for wishing to relocate the temporary building to the suggested location at the front of the site. Should planning permission be given for the second application for a two storey extension to accommodate a further form of entry at the school, it would be sited over the area where the temporary building is currently located at the rear of the site. This second application has not been determined yet, and is being considered

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alongside the current application for permanent accommodation at Wilmington Academy, both of which will be reported in due course.

24. Initially it was considered that both applications at this site should be determined together, as there would be no need to relocate the temporary building if the permanent extension was not approved. However, the applicants have requested this application be determined separately, as the School need to use the temporary building in association with the bulge intake of 20 pupils in September 2016, and this use is not ideal in its current location. They therefore wish to re-site the building in any event.
25. Concern was raised that by determining this application separately from the main extension, there was an assumption that the two storey extension would get approval. However, it is considered that the two applications can be dealt with individually and any consent for this application would not pre-determine the main extension since that application would still need to be determined on its own merits in due course.

Siting and design impact of relocated classroom

26. The temporary building would be sited to the front of the main school and would therefore be visually prominent within the street scene of Parsons Lane. Given its temporary structure and prominent position it is considered that it would not be appropriate to site the building here for anything other than a temporary period, as it would detract from the setting of the school, and the visual appearance of the wider area of Parsons Lane. This concern was raised by Dartford Borough Council in their consultation response, who also felt the temporary building would be incongruous with the other buildings sited at the front. In their response they suggest an alternative location at the rear would be preferable, to the west of the hard ball courts. The land to the west of the ball courts is also currently used for parking for staff at the school, and it is considered that locating the temporary classroom here would result in the displacement of more than 10 spaces, given the narrow and linear nature of the parking in this area, as shown on the plan included above. It would also result in the building being in much closer proximity to the neighbouring properties to the west of the school, which would bring additional amenity issues for these residents.
27. It is considered that by only allowing the building to be sited where proposed for a temporary period, it can be ensured that the impact on the setting of the school and the wider area can be limited to a short time frame. A temporary period of 2 years is suggested, after which it would need to be removed from its current location and the site returned from to its former use as a parking area. If, however, an application to retain it is subsequently made, the visual impact of having the classroom in this location could then be reassessed. On this basis it is considered that the proposed relocation would be acceptable, in relation to Policies B1 and S6 of the saved Local Plan and DP2 of the Dartford Development Policies Plan.

Displacement of parking spaces

28. The building, in its proposed location at the front of the site, would be sited on an area previously laid out as parking as part of the consent given for the new curved music block. 10 parking spaces would therefore be temporarily lost as a result of this application. Given the concerns raised over traffic problems in the area and the widespread parking issues associated with not only this school, but the other schools in

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the area, it is considered that these 10 spaces would need to be temporarily replaced elsewhere for the application to be considered acceptable. The applicants have submitted an additional plan showing where the 10 spaces, together with the 2 additional spaces required, could be sited to the south of Parsons Lane, which is included above. This area is currently only used informally for parking, and previously storage containers were sited in this area, which have now been removed. There is an existing permission associated with this land (approved by Dartford BC in 2015, reference 14/01707/FUL) for a new sports hall, but this has not been built and therefore the land remains available for a parking use for a temporary period associated with the loss of spaces in front of the school.

29. Given the lack of formal spaces laid out in this area, it is difficult to demonstrate that the spaces now shown for the parking of 12 cars are not currently used on an informal basis. A further plan was therefore requested from the applicants to show where the existing 79 parking spaces for the school are currently located, as referred to in the submitted School Travel Plan, and this plan has now been submitted. Existing parking spaces are dotted around the campus on both sides of Parsons Lane – an existing 10 in the location of the proposed temporary spaces, 9 by Wilmington Manor Lodge, 31 in front of the main school (10 of which would be lost through the siting of the temporary classroom) and 29 along the western edge of the school site, to the rear by the hard ball courts.
30. Given that these 79 spaces are shown elsewhere within the wider school site, it is considered that the provision of the 12 spaces would be considered as 'additional' to that already provided and would therefore be acceptable, provided they are clearly laid out on the ground with pegs or other permanent marking, and that a condition be imposed which requires their retention and use for the period that the temporary building is sited at the front of the school, displacing existing parking spaces. Subject to that it is considered that the siting of the temporary building would not result in any net loss of parking associated with the site, and therefore would not add to the current parking and traffic problems outside the school. In this regard the application would accord with Policy T23 of the saved Local Plan, Policy CS15 of the Core Strategy and Policies DP3 and DP5 of the Dartford Development Policies Plan.

Other Matters**Alternative Site**

31. The Area Education Officer was asked to provide a response to the Parish Council's comments about using the former Rowhill School as a satellite for either the Grammar School or the Academy. In response they state that these buildings were last used approximately 5 years ago as a Pupil Referral Unit and before that as Rowhill Special School. There are two main single storey buildings on site, one built in 1973 and one in 2001, with a site size of 1.48 hectares (3.66 acres). They state that there are three reasons why the site would not be appropriate as a satellite. First the existing buildings and building footprint do not lend themselves to secondary school use, having been designed originally to facilitate special school education. They state that they could conceivably be adapted for *primary* aged pupils but that it would be expensive to adapt or rebuild the facilities for *secondary* use. Secondly, two alternative uses for that site had already been considered, which were to sell the site for a capital receipt or retain it for a new primary Free School. Thirdly, to use the school as an annexe would see the

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constant movement of students between the two sites, making it unnecessarily operationally inefficient.

32. Other concerns with using the site as an annexe are the sustainability issues of having two administration bases, the need for unreasonable duplication of facilities such as the canteen, sports facilities and specialist teaching accommodation, and the potential need for students to be transported between the two sites several times a day. In summary they state that the site size of 1.48 hectares (3.66 acres), in conjunction with the above comments means that the site would not lend itself to secondary education as an annexe, and would not be favoured by either the Academy or the Grammar School. Under the circumstances, I accept that the Rowhill site does not offer a workable or deliverable alternative to the current proposal.

Hours of Construction

33. Given the concerns over traffic and parking problems at school drop off and collection times, it is considered appropriate that should permission be given, any construction traffic or deliveries associated with the relocation of the temporary building and the laying out of the parking spaces should be restricted to hours outside of peak school times, and this can be covered by a suitably worded condition.

Conclusion

34. This application seeks approval for the relocation of an existing temporary classroom from the rear of the main school building to the front and the temporary displacement of 10 parking spaces to the southern side of Parsons Lane. The relocation would allow the School to better utilise the temporary classroom to accommodate the bulge intake of 20 pupils from September 2016. It would also regularise the current position of it not benefiting from planning permission in its existing location.
35. In my view the key determining factors for this proposal are the planning policy aspects in relation to the Green Belt, together with the wider visual impact of siting the temporary classroom in this location and the resulting temporary displacement of parking spaces. In addition weight should also be given to the NPPF's clear policy support for ensuring that a sufficient choice of school places be available to meet the needs of existing and new communities, and the need to create, expand or alter schools. Subject to any permission being given for a temporary period only and subject to conditions to secure the provision of replacement parking facilities, I consider that the development would not give rise to any demonstrable harm as explained in the discussion above, and would meet the aims of the NPPF in relation to the guidance for school provision.

Recommendation

36. I RECOMMEND that PERMISSION BE GRANTED, SUBJECT TO the imposition of conditions covering (amongst other matters) the following:
- The temporary building hereby permitted shall be removed from the site on or before 1st September 2018 and the existing parking spaces reinstated;
 - The development to be carried out in accordance with the permitted details;

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- The 10 replacement and 2 additional parking spaces to the south of Parsons Lane shall be laid out with pegs or other permanent marking prior to the occupation of the relocated temporary classroom, in accordance with drawing number 11231 T-08 Rev P2, and shall be retained for the period of its siting;
- Construction traffic and deliveries to the site shall be restricted to hours outside of peak school times – prior to 8am and after 9am, and prior to 3pm and after 4pm.

Case Officer: Helen Edwards

Tel. no: 03000 413366

Background Documents: see section heading

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Representation from Wilmington Safer Streets

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Wilmington Safer Streets - Resident Consultation

Before we began this document we wanted to identify the main aims of Dartford Borough Council. Please see the below text taken from Dartford Borough Council's latest Core Strategy. **We felt the last paragraph was significant to our concerns.**

"This Core Strategy is a significant document for everyone who lives and works in the Borough. Whilst no one could ever claim that it makes light reading what it contains and what it may mean for the future of our community is hugely important. It sets out the approach that a number of partners - particularly those involved in community planning and development control - will take to the challenges ahead. It looks at this community's future needs in areas like housing, transport, leisure, growth and jobs. It seeks to provide a 'routemap' to ensure that the future Dartford we get is the future Dartford we want.

The strategy is not a fixed blueprint. Over time it will flex, change and adapt to different circumstances but the core principles will be the ones that drive our decision-making and policies for the years ahead.

Please don't think that this strategy is all about development and building things. It's not.

Some of its most important proposals relate to things we won't permit - like overdevelopment, excessive burdens on our transport network, poor design and badly thought-out architecture. It rightly places huge importance on public spaces, the dignity of housing that we demand and the need to provide social infrastructure - things like village halls, playgrounds, parks, open spaces and even cemeteries. It also encapsulates my own personal view that a place like Dartford - a rich mix of rural villages and urban centres - should only grow and change at a rate that's supported by local people.

Dartford is your town and its growth, future and character are in your hands."

Jeremy Kite
Leader of Dartford Council

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Areas of concern that need addressing in the Transport Consultation

**Proposed Expansion of
The Academy and Wilmington Grammar School for Girls**

CONGESTION

Main Causes of Congestion :

- Common Lane is not wide enough in places for buses, coaches and other large vehicles to pass each other, resulting in vehicles dangerously mounting the pavement whilst children and families are walking along it. **See photos L, M and N.**
- Common Lane is not wide enough to allow filter traffic to turn right in to the school entrance at the bottom of the Village Common.
- Insufficient waiting and parking zones on site at schools for parents who wish to collect or drop off their children which results in parents parking where ever possible, no matter if it blocks access routes and causes congestion to other road users. **See photo P.**
- Schools currently restrict parents from entering the Academy to collect their children. At 3pm each day two school wardens are placed at the main entrance to the Academy and their job is to stop parents from parking on site, which leads parents to parking anywhere possible, no matter if it blocks access routes and causes congestion to other road users. **See photo P.**
- Buses and coaches are restricted on their route when trying to turn from Common Lane in to Parsons Lane due to the amount of cars parked across the entrance of Parsons Lane.
- Buses currently collect school children from 'unofficial bus stops' created by the school children. One example of this is a bus that currently collects groups of girls who congregate at the corner of Parsons Lane and Common Lane. This again leads to immense congestion and is incredibly unsafe for the children. Please note to widen these pavements, as suggested, would simply encourage the children to use this area as an unofficial bus stop even more. **The area of the unofficial bus stop is shown in photos A and B.**

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- Other roads in the area around the schools are also affected greatly by the traffic and congestion issues. We asked our members to share details of problems in other local roads and got a lot of information back about some key "hot spots":
 - **Edwin Road** (marked with a blue star on the map) is extremely hard to navigate exit safely during school run times due to parents parking on both sides of the road on the section nearest to Common Lane, this means not even a large car is able to pass through, let alone an emergency vehicle. In addition, as you exit Edwin Road onto Common Lane, there's rarely a weekday afternoon when people aren't parked on the yellow lines on Common Lane, near the corners of Edwin Road. You cannot see anything coming up or down Common Lane until you have pulled out into the path of any oncoming traffic, making it almost impossible to exit Edwin road safely.
 - **Tredegar Road** (marked with a red star on the map) is also affected. Parts of Tredegar Road are very narrow and traffic has increased along here since the last expansion of the Academy so we envisage this will continue to become more of a problem. The road is used as a cut through and speed, especially along the narrow sections is a real problem. Cars and vans regularly mount the pavement to pass cars coming the other way. Tredegar Road is also used as a cut through for students walking to the bus stop at home time, due to the narrow pavements they spill onto the road and into the paths of parents rushing to pick up their own children, resulting in hooting and swearing.
 - **Wilmington Court Road** (marked with an orange star on the map) is used as a cut through and speed along here is a concern among residents.
 - **Broad Lane** (marked with a green star on the map) is also affected, parents and students park there, adding to congestion and often parents arriving for pick-up and drop-off times park across driveways. Students parking here all day prevent home owners parking outside their own homes, a problem which will only get worse with increased students in the area.

COMMUNICATION

- Schools need to increase the flow of information and communication between themselves with regards to the congestion and parking issues created by the parents, coaches, buses and 6th former parking.
- Schools need to communicate more with local residents on local issues created as a direct result of the schools.
- Schools need to give advance warning to local residents when traffic is expected to be increased out of normal school hours. E.g. local residents are not given prior warning when the schools have open evenings, which grinds the whole village to a halt due to the parking of the prospective parents for all three schools along Common Lane and surrounding areas between and 6 and 8pm.

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SAFETY

Currently Common Lane is very unsafe for its users and Kent County Council need to address the following issues:

- Coaches and buses mounting pavements to pass each other, which is dangerous to the school children and other pedestrians. There have been several instances of buses hitting children in accidents that have miraculously not resulted in serious injuries. One Academy pupil was recently hit by a bus as she walked along the pavement on Common Lane. **See photos L, M and N.**
- Speeding trucks that use Common Lane as a cut through to the various construction industry businesses in the area, including the aggregate and concrete supplier on High Road Wilmington, and some of the businesses located in the industrial park off Powder Mill Lane to the East of the village. These vehicles are enormous and are thundering past very young children, just inches away, at speeds inappropriate for the road.
- Lack of safe and secure crossings for the school children and pedestrians.
- Lack of signage about safe parking, and lack of school crossing signs (the ones that exist are largely obscured by foliage, **see photo J**).
- Lack of safe places to stop and wait whilst collecting children from school.

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ENVIRONMENT / PUBLIC HEALTH

Observations and Existing Concerns:

- Concerns over the length of the expansion projects and lack of parking on site for contractors, which will overflow on the already strained parking we have in the village.
- Concerns over an increase in nuisance behaviour by students to and from the schools, with the increase in numbers.
- A high percentage of children attending these schools are not local and therefore will be driven to and from school which means a further increase in car pollution/carbon emissions in our local area.
- Smoking and associated litter by school children (see photo V). Litter is currently a big issue, even without the expansion, and needs to be addressed. The woodland from Tredegar Road is used as a walkway to and from the bus stops and schools by pupils and an easy place to drop their litter en route, particularly as there is only one (very unstable) bin in this area (see photos D and F). The level of local litter has reached the point where the Parish Council have organised a volunteer clean up session in March.
- Rude and aggressive behaviour of parents collecting their children when challenged for their unsafe parking by pedestrians or residents, with little support given by the schools.
- Losing the 'village feel' by allowing this expansion, any changes to improve safety need to be made sympathetically in order to keep the village feel of Wilmington and prevent it turning into a "campus" for local schools.
- The last expansion of the schools was completed in July 2014, can we have an assurance there will be no more expansion in future?
- Lack of support and acknowledgement by Dartford Borough Council and Kent County Council regarding local resident parking issues in the past and present, let alone with the proposed new expansion. Currently any parking restrictions are not enforced at all, the parking wardens have only attended once since September 2015 despite numerous complaints from residents. Parking restrictions simply do not work without enforcement.
- Poor parking across pavements which leave pedestrians with young children and buggies no option but to walk into the road – see photos Q and R. Poor parking has led to the deterioration of the grass on our village Common, as pedestrians are forced to walk on the edge of the Common in order to pass the cars blocking the pavements – see photos S, T and U and V.
- Gangs of children waiting on the edge of the village Common, again ruining the grass.

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- Schools need to accept responsibility and act towards a solution when residents make them aware of issues. Complaint emails have been ignored in some cases. Extract taken from "Home to school travel and transport guidance- Department for Education - Statutory guidance for local authorities":

"July 2014 - Poor behaviour on school buses/other modes of transport

47. The department expects each school to promote appropriate standards of behavior by pupils on their journey to and from school through rewarding positive behaviour and using sanctions to address poor behavior. The EIA 2006 empowers head-teachers to take action to address unacceptable behaviour even when this takes place outside the school premises and when pupils are not under the legal control of the school, but when it is reasonable to do so. In the department's view, this would include behavior on school buses, or otherwise on the route to and from school, whether or not the pupils are in school uniform."

SPECIFIC PARKING ISSUES THAT NEED ADDRESSING AND HAVE BEEN RAISED ALREADY WITH KENT COUNTY COUNCIL

- Persistent stopping and parking on the triangle piece of pavement outside Wilmington Day Nursery. See photo O.
- Persistent parking across the public footpath entrance that leads to Tredegar Road. See photo D.
- Parking at the entrance of Parsons Lane, increasing congestion and making the area unsafe. See photos B and C, which show the areas where parking is a problem.
- Persistent unsafe parking and stopping over local residents private access roads - which violates Highway Code 243:
DO NOT stop or park:
I.anywhere you would prevent access for Emergency Services
II.in front of an entrance to a property

RESPONSIBILITY

- Schools need to acknowledge responsibility of their pupils and the associated issues that we incur as residents by their presence. Litter, parking, congestion etc. Schools frequently ignore emails from residents and do not address the issues we have raised previously.
- Schools need to educate their 6th form students on safe parking, these students have often only just passed their test and frequently park in unsafe places which directly affects pedestrian access in the village. This needs to be addressed and advice given to

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the students on where to park when attending their school. This needs to be done each year.

- Schools need to educate the parents of the pupils on where is safe and appropriate to park, collect or wait for their children.
- Schools need to increase available parking on site for parents at collection and drop off times. Currently two stewards from the Academy do not allow parents on site for the afternoon collection. This is unfair on local residents and needs to be addressed as it increases the chance that those vehicles will sit and wait in unsafe and nuisance places.

POLICE

- After complaints from local residents regarding the numerous issues we face, the local police suggested a police presence for 1 hour each week on the village Common to assist with issues. Currently a police van with two PSCOs park around the village Common from 10am-11am every Tuesday, perhaps one of the quietest times of the week. When questioned why they were not able to attend at the time of the reported issues (between 8 and 9am or 3 and 4pm) we were told that resources wouldn't allow that.
- This leads us to think that the police are not properly engaging with the schools or the local residents on these issues as the police are even present on the Common during schools holidays, which seems a waste of local resources when clearly there are no issues at these times as the schools are closed.

WILMINGTON SAFER STREETS' SUGGESTED SOLUTIONS TO THE ABOVE ISSUES

- We would ask that instead of filling the village with fixed bollards, which we feel will ruin the look and feel of our pretty village, Kent County Council should place raised flower beds outside of Wilmington Day Nursery where the parents constantly park on the triangle piece of pavement alongside the zig-zig lines on the main road. **See photo O.**
- An additional pelican crossing to be added by the Primary School, this would provide safe crossing and also alleviate the congestion at the other crossing further along Common Lane. This would also mean that traffic further up the hill would not be held up as frequently as it currently is. **See point 13 on the map.**
- Where parking is currently permitted on the Common - place marked parking bays for safe kerb parking - 50% on the curb and 50% on the road. This will ensure enough room is left for pedestrians to walk safely along the pavement. It will also encourage safer parking. **See photos X and Y for an example of this in another borough.**

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- Place double yellow lines on any part of the pavement where dedicated kerb parking bays will not work, there is one particular piece of pavement used as a parking space and pedestrians are left with no alternative but to walk in the road - see photos Q and R.
- Ensure consistent and effective enforcement of parking restrictions. At present yellow line restrictions are not enforced at all and any future additional restrictions will need proper policing/enforcement. Dartford Borough Council needs to take responsibility for this.
- Upgrade and move the barrier which is placed at the start of the public footpath leading to Tredegar Road. See photos D and F. The barrier currently sits back from the road and this allows cars to park and sit and wait in front of it, we would suggest moving this barrier nearer to the road. By reducing the amount of space at the mouth of the footpath, you will stop cars being able to park in this very dangerous and congested spot.
- Re-route the coaches and buses to make their journey as efficient as possible and reduce congestion.
- Reduce the speed of traffic by adding speed calming solutions as the current speed bumps are not working and are poorly maintained. See photos E and F. We think a 20mph speed restriction is needed along Common Lane.
- Place double yellow lines all the way up Common Lane from the private road to Parsons Lane, as this currently has no restrictions and unless policed, parents will start to park here going forward and have done so in the past when attending open evenings.
- Place white deterrent lines across the private access road entrance on Common Lane to signify the access route to properties. See photo W for an example.
- Create a drop-off and pick-up site for parents away from the village on Oakfield lane, where there is no residential housing and the road is wider.
- Create a coach park/drop-off on Dartford Heath or on site at the Girls Grammar School.
- Current bus stops need reviewing and the 'unofficial bus stops' should not be permitted. Children should be walking to safe official bus stops away from Common Lane, not congregating in large groups on narrow pavements.
- Increase the amount of litter bins on the Common and in the woodland.
- Carry out a structural check on the old wall that runs up the hill on common Lane on the border of WGSG land. See photos G and H.

Having attended the evening consultation at the Academy in February we were impressed with some of the solutions proposed, although any changes absolutely have to be made in keeping with the village feel of Wilmington. Any additional pathways or walkways would have to be designed appropriately to avoid any future issues – such as creating places where anti-social behaviour and littering would be likely. Any street “furniture” would need to be in keeping with the village and where possible historical features, such as the old walls along Common Lane, should be retained.

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Map and photos of key locations on Common Lane, Wilmington



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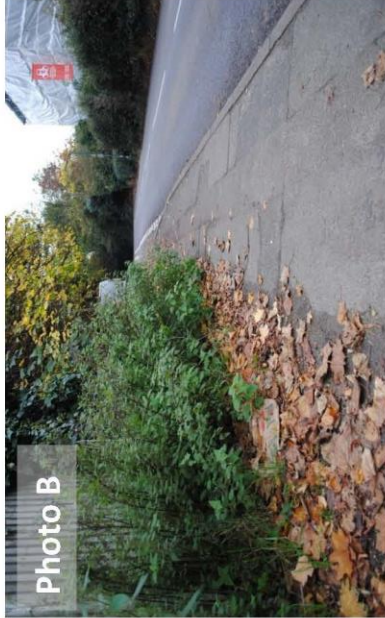


Photo B

Point 5 on map
On this narrow section of pavement just off Parson's Lane an "unofficial" bus stop operates for pupils for the Girls' Grammar school. Photo B shows the view towards the corner of Parsons Lane where parents park and block buses causing traffic to come to a standstill.

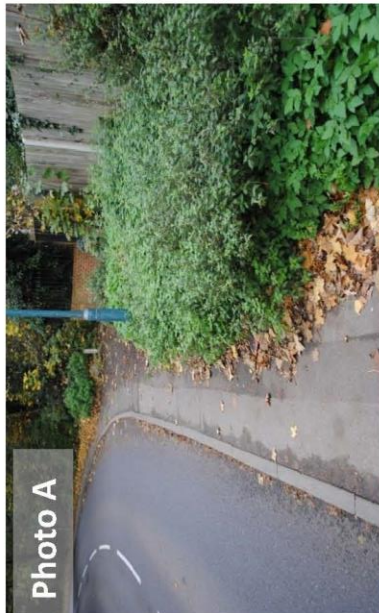


Photo A



Photo D

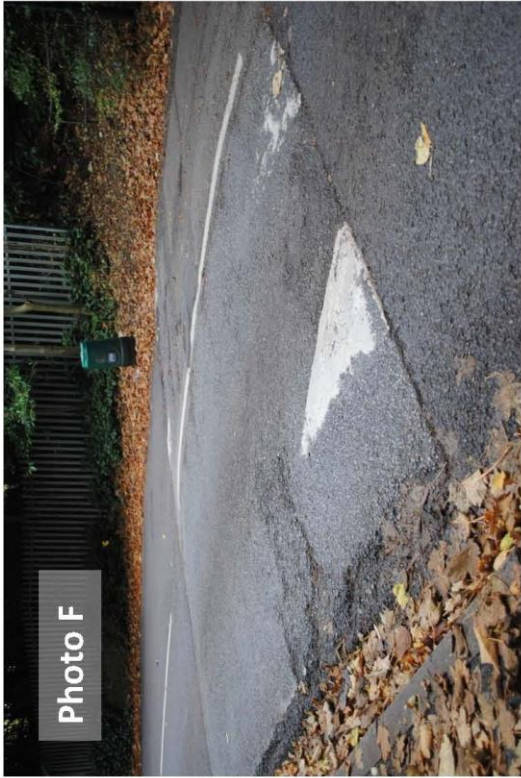
Point 7 on map
Just after the blind corner is the access to the alleyway leading through the woods to Tredegar Road. That bin is frequently tipped over by kids/wind/or people moving it to park across the alleyway entrance. Consequently litter is strewn across the road and woods. Parents frequently use this to park, churning up the mud and making it slippery and dangerous as well as blocking the entrance to the footpath.



Photo C

Point 6-7 on map
Looking from Parson's Lane towards the blind corner. From this point onwards until the Common the road is not wide enough for 2 buses, or other large vehicles, to pass.

Relocation of existing temporary classroom to the front of the school from the rear at Wilmington Grammar School for Girls – DA/16/00800/CPO (KCC/DA/0091/2016)



Point 7 on map
The speed bumps are poorly maintained and ineffective to large vehicles, particularly the large plant vehicles travelling through the village.

Relocation of existing temporary classroom to the front of the school from the rear at Wilmington Grammar School for Girls – DA/16/00800/CPO (KCC/DA/0091/2016)

Appendix 1



Photo G

Point 7-8 on map

The pavement is only on one side and is extremely narrow. Buses mount the pavements here, but even when they don't they are travelling at 30mph or more within inches of small children, families and secondary pupils. Heavy construction vehicles also travel along this section at speed.



Photo H

Point 8 on map

You can see here how narrow the pavement is and how narrow the road is.



Photo J

Point 9 on map

Signage is almost entirely obscured by overgrown foliage. The double yellow lines stop here and parents do, inexplicably, park on this section of road causing massive congestion in the area. In Photo H you can see how close buses come to pedestrians, in this instance the bus had pulled slightly over the centre of the road to avoid hitting the pedestrians.



Photo K

Relocation of existing temporary classroom to the front of the school from the rear at Wilmington Grammar School for Girls – DA/16/00800/CPO (KCC/DA/0091/2016)

Appendix 1



Photo M

Point 8 on the map
 These photos are just 4 of many taken by parents and residents. This is a daily occurrence during term times. In every one of these photos you can see children walking along pavements as buses brush past them.



Photo L



Photo N

Item D1
Relocation of existing temporary classroom to the front of the school from the rear at Wilmington Grammar School for Girls – DA/16/00800/CPO (KCC/DA/0091/2016)

Appendix 1



Point 12 on the map
Parents park on both sides of the road on yellow lines causing chaos.



Point 10 on the map
Parents park on the pavement to avoid the zig-zags, this obscures the view for children crossing and is illegal and dangerous.

Relocation of existing temporary classroom to the front of the school from the rear at Wilmington Grammar School for Girls – DA/16/00800/CPO (KCC/DA/0091/2016)

Appendix 1

Point 10 on the map
.Sixth formers and parents frequently park on this section of pavement leaving no space at all for pedestrians and forcing them to walk into the road.



Photo R

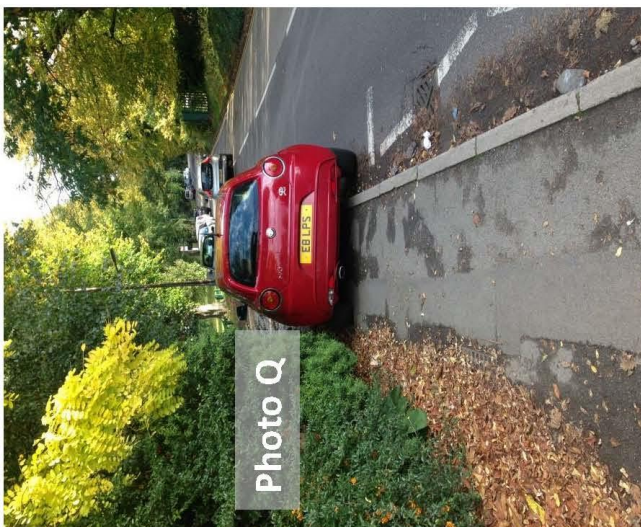
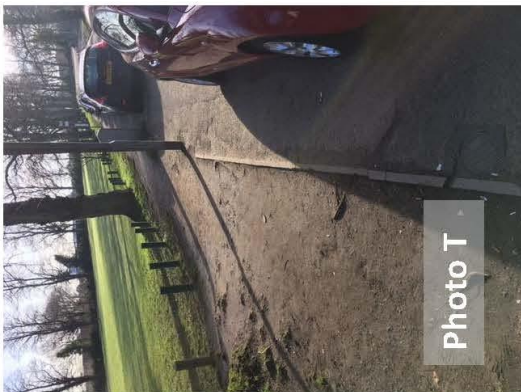
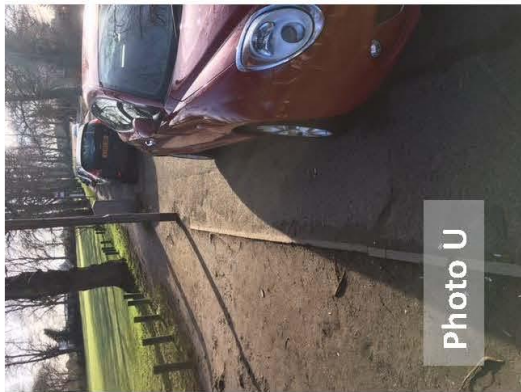


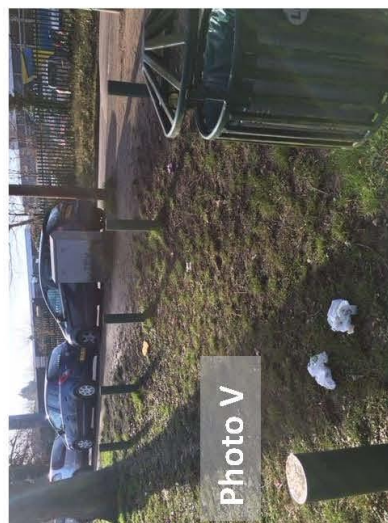
Photo Q

Relocation of existing temporary classroom to the front of the school from the rear at Wilmington Grammar School for Girls – DA/16/00800/CPO (KCC/DA/0091/2016)

Appendix 1



Point 11 on the map
These photos show the deterioration of the Common due to pedestrians having to walk along the edge as the pavement is blocked by cars.



Relocation of existing temporary classroom to the front of the school from the rear at Wilmington Grammar School for Girls – DA/16/00800/CPO (KCC/DA/0091/2016)

Appendix 1



An example of allocated kerb parking bays.

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Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016)

A report by Head of Planning Applications Group to Planning Applications Committee on 14 September 2016.

Three temporary single storey classrooms to accommodate the 2016/2017 allocation of pupils (in conjunction with a separate application to permanently expand the school (KCC/DA/0085/2016), two additional bus bays within the Academy site, provision of a new footpath link between the car park and Public Right of Way DR118/118A to the north west, and widening of a section of footway on Common Lane - at Wilmington Academy, Common Lane, Wilmington (KCC/DA/0088/2016) (DA/16/799)

Recommendation: Planning permission be granted subject to conditions.

Local Member: Mrs Ann Allen

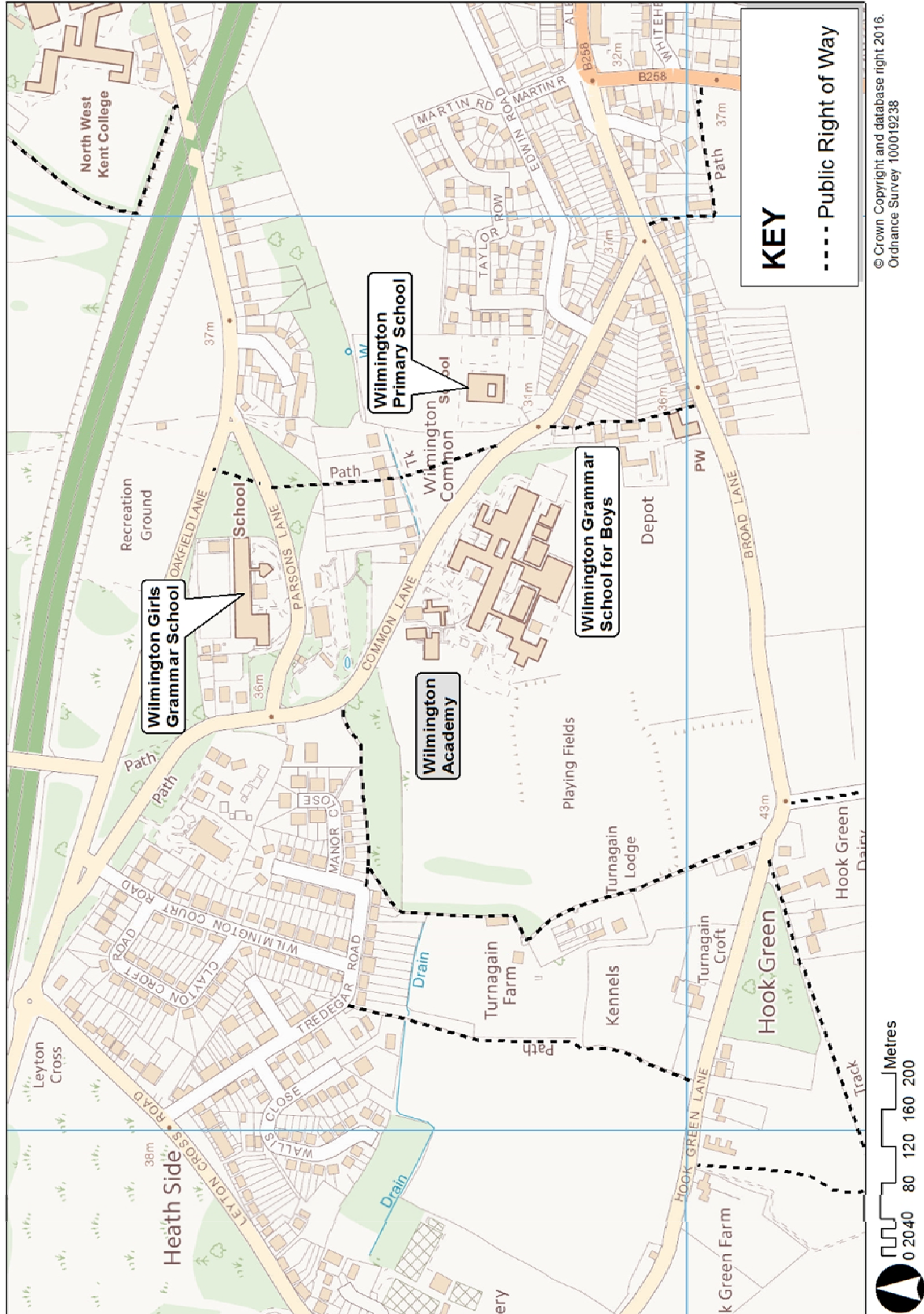
Classification: Unrestricted

Application Site

1. Wilmington Academy is located to the north west of the village of Wilmington and is accessed via Common Lane, a road which links Wilmington to Leyton Cross - a small residential area to the northeast of the Academy site. Dartford town centre is located approximately 2.3kms (1.4 miles) to the north east of the Academy site. The whole of the 8.45 hectare (20.8 acre) Academy site is located within the Metropolitan Green Belt. Built development on the site is concentrated to the north east of the site, adjacent to the Common Lane site frontage, with playing fields and open grassland extending to the south and west, beyond which lie open agricultural fields and the wider countryside. The northern boundary of the Academy site is a heavily wooded steep embankment, beyond which lies Public Right of Way (PROW) DR118A, which links with PROW DR118 which follows the western boundary of the Academy site. To the north of the application site, beyond the PROW DR118A, residential properties in Manor Close and Tredegar Road back onto the site from an elevated position. A small row of residential properties are located opposite the existing site exit on Common Lane, and face toward Wilmington Common.
2. The Academy site was recently redeveloped (see paragraph 5 below), providing a purpose built new Academy building and a new site entrance and car parking area. Previous to this, the Academy operated from buildings that were built in the mid 1970's, which were then split in the 1980's to accommodate two schools, Wilmington Grammar School for Boys (WGSB) and Wilmington Academy. The Academy continues to occupy the north western side of the site, albeit in a new building, with WGSB (which has Academy Status) to the south east. The organisation of the whole site is further complicated by a third school, Wilmington Grammar Schools for Girls (WGSG), who own a sports pitch in the south west corner of site and have rights of access through the Academy to reach it. The Academy and WGSB share one exit point onto Common Lane, with the Academy entrance located to the north of that exit, with a oneway access loop extending up to the frontage of the Academy building for pupil drop off linking the entrance and exit. A private nursery is located to the front of the Academy site, within the access loop and on the Common Lane road frontage. In addition to WGSB, Wilmington Grammar School for Girls (WGSG) is located to the north of the Academy site, accessed via Parsons Lane, which links Common Lane with Oakfield Lane. Further, to the south east of the Academy site, Wilmington Primary School is located to the northern side of Common Lane, again accessed via Common Lane only.

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy - (KCC/DA/0088/2016) (DA/16/799)

Site Location Plan



Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy - (KCC/DA/0088/2016) (DA/16/799)

Proposed Site Plan



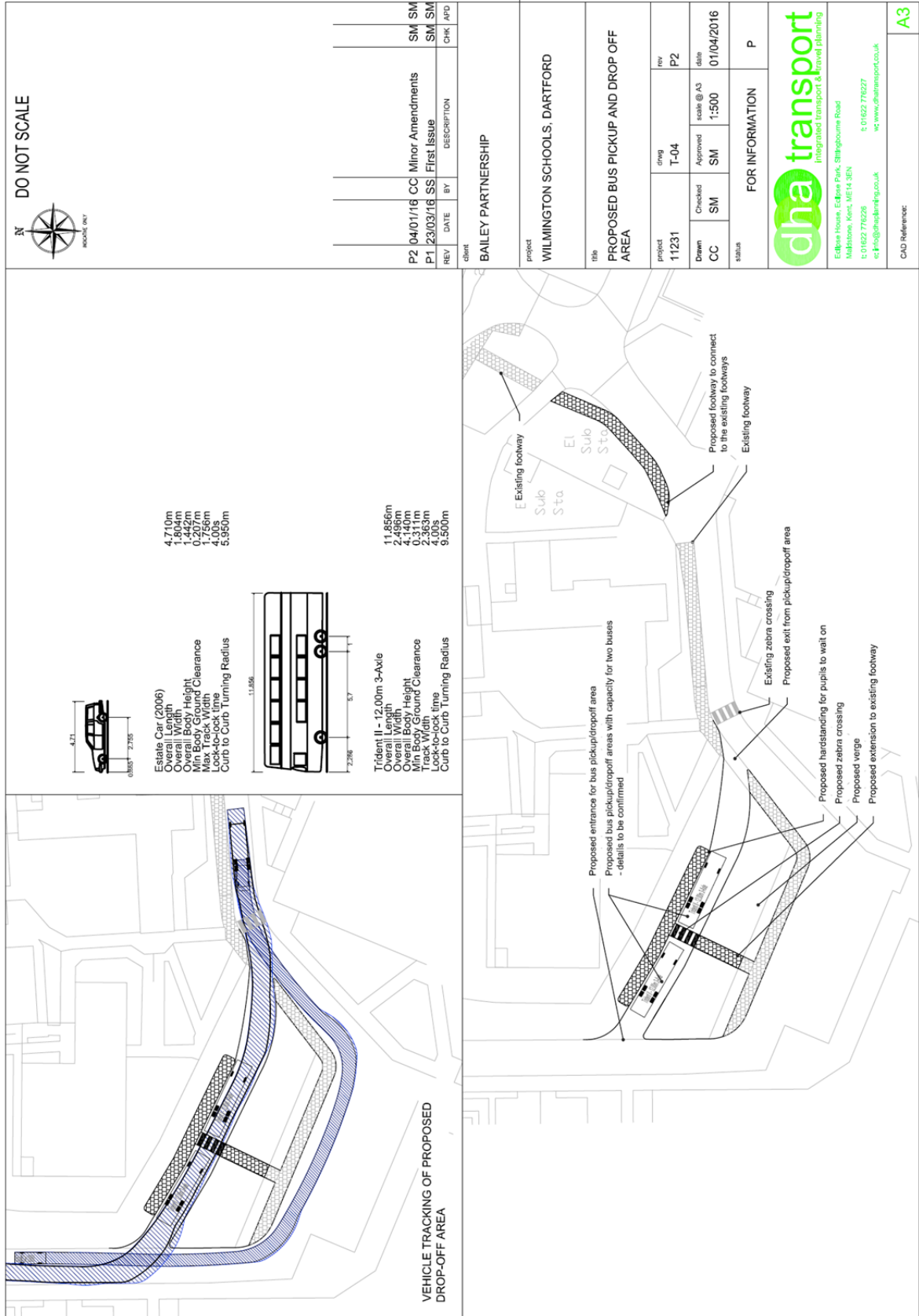
Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy - (KCC/DA/0088/2016) (DA/16/799)

Proposed Onsite Footpath Link (dashed line)



Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

Proposed Bus Drop-off/Pick-up Spaces



Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

3. In light of the site's Green Belt designation, this application has been advertised as a Departure from the Development Plan. However, should Members be minded to permit, the application would not, in this particular case, need to be referred to the Secretary of State due to the size, scale and impact of the development (to be discussed in detail within the discussion of this report). *A site location plan is attached.*

Background and Relevant Planning History

4. Wilmington Academy has been operating as an Academy since 1 September 2010, originally in the buildings of the former Wilmington Enterprise College. The Academy is part of The Leigh Academy Trust federation, which was formed in 2008 with the linking of the Leigh Academy (Dartford) and Longfield Academy. The Trust now encompasses 9000 students in 13 primary, secondary and special academies, five of which are in the Dartford Borough, three in Maidstone Borough, two in the Sevenoaks District, one in Tonbridge and Malling Borough, and two within London Boroughs.
5. Planning permission was granted in 2012 (consent reference DA/12/14) for the redevelopment of the academy site, which included the demolition of the majority of the existing buildings and the erection of a two storey academy building and sports centre, in addition to associated landscape works and the provision of a new dedicated access point leading to 92 car parking spaces and 4 bus drop off/pick up spaces. That redevelopment did not propose any expansion to the Academy, and was designed to accommodate a maximum capacity of 950 pupils.
6. Wilmington Academy is, however, now proposed to expand incrementally over a 5 year period from a 6 form of entry (FE) Secondary School (900 pupils plus sixth form, with a pupil admission number (PAN) of 180) to a 8 FE School (1200 pupils plus sixth form, with a PAN of 240). An application for permanent accommodation to house the proposed additional pupils was submitted in parallel to this application. That application, reference KCC/DA/0085/2016 is yet to be determined due to a significant level of local objection regarding highway safety and access issues, and an objection from Kent County Council Highways and Transportation (due to highway safety concerns). Discussions between the Applicant and Highways and Transportation are ongoing, with issues still unresolved at the time of writing this report.
7. In addition to the proposals to expand Wilmington Academy, we are also in the process of determining two applications at Wilmington Grammar School for Girls. The first of these proposes the relocation of an existing temporary modular building (Item D1 on these papers KCC/DA/0091/2016) and the second proposes the erection of a two storey teaching block to facilitate a 1FE expansion of the Grammar School from 4FE to 5FE (1050 pupils including sixth form). That application, reference KCC/DA/0090/2016, has also met with a significant amount of local objection regarding highway safety and access issues, and there is an outstanding request from Highways and Transportation for the applicant to provide additional information. Again, discussions between the Applicant and Highways and Transportation are ongoing. It should also be noted that Wilmington Grammar Schools for Boys is in the process of expanding, with a September 2016 intake of 977 pupils, an increase of 50 pupils over the 2015 intake.
8. Further to the above, I am advised by the applicant that demand for school places within the Dartford Borough has already resulted in Wilmington Academy experiencing a rise in its PAN to 200 in 2014 and 2015. In addition, the Education Authority advises that it has offered places at the Academy to 240 pupils for September 2016, and that projections

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

identify a need for an ongoing PAN of 240. The applicant advises that the projected number of pupils on roll in September 2016 is 1134, 184 pupils above the 950 pupil capacity of the buildings permitted when the academy was redeveloped in 2014 (consent reference DA/12/14). Therefore, in considering this application, we need to assess the impact of an additional 184 pupils, not just the additional 40 proposed to start in September 2016.

Amendments Following Initial Submission

9. When originally submitted this application met with serious concern and objection from Highways and Transportation on the ground of highway safety, particularly the potential for additional pupils using the footway between the Academy exit and Parsons Lane. That footway, which runs to the eastern side of Common Lane, experiences existing serious pedestrian safety issues due to buses having to mount the pavement to enable two buses to pass each other due to the narrow width of the road at this point. The high number of pedestrians using this narrow footway at peak school times, due to the number of schools in the immediate locality, means that there is regular conflict between pedestrians and vehicles.
10. As a result of the initial objection from Highways and Transportation, the applicant spent a significant amount of time discussing the application with Highway Officers in an effort to identify improvements that could be made to pedestrian access and to further identify measures that could be included within the application that could mitigate the concerns/points of objection raised. A key issue to resolve was ensuring that pedestrian activity on Common Lane was not increased.
11. As a result of such discussions, the applicant amended to proposal to include:
 - two additional bus bays within the Academy site;
 - provision of an onsite footpath link between the Academy car park and Public Right of Way DR 118/118A to the north west (joining with Tredegar road); and
 - the widening of a section of footway on Common Lane, at the junction with Parsons Lane, by removal of an area of vegetation/scrub.
12. As will be discussed in detail later in this report, the measures outlined above, although positively received, were not considered sufficient on their own to overcome Highway and Transportations points of objection. As a result, the application was further amended by:
 - a reduction in the number of modular classrooms proposed from an initial six to three;
 - the submission of a revised Travel Plan detailing measures and initiatives to be put in place to manage pupil pedestrian activity and encourage use of the internal footway by Academy pupils and other local schools; and
 - the proposed surfacing of Public Right of Way DR118A.
13. It is the revised proposal that will be discussed throughout this report.

Proposal

14. This application (as amended) has been submitted by Kent County Council Property and Infrastructure Support, and proposes the provision of three temporary classrooms to accommodate the 2016 additional pupil intake and previous intakes over and above the 6FE original pupil admission number (PAN) of 180 pupils per year. As set out above, that equates to an additional 184 pupils over and above the 950 capacity approved in

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

2012, with a projected school roll of 1134 in September 2016. The Academy have stated that an additional four full time equivalent (FTE) staff would be employed from September 2016, bringing the total number of FTE staff at the Academy up to 158.

15. The applicant advises that the proposed temporary buildings would be used for the education of students during the period of September 2016 to September 2017, with the intention then being to remove the buildings and decant into permanent accommodation (subject to planning approval (application reference KCC/DA/0085/2016)). Initially six mobile classrooms were proposed, but the applicant recently reduced this number to three.
16. The applicant advises that, following further consultation with the Academy Management Team, it was identified that it would be possible to accommodate additional teaching areas within the main academy building by undertaking some internal alterations (which do not require planning approval), hence the reduction in the amount of temporary accommodation proposed. Analysis of the existing accommodation within the academy building identified that the proposed increase in the school roll would also necessitate the provision of an additional food technology room, additional IT suites and an increased dining area. From assessing the floor plans, the applicant identified that the required food technology room and dining space could be provided within the existing building by undertaking internal alterations, including the sub-division of an IT suite. Three additional teaching spaces are also proposed to be provided within the main academy building, although it should be noted that these alterations would result in pupils being taught in unconventional classroom spaces. The proposed three temporary classroom units are intended to be used to provide the remaining required accommodation – replacement and additional IT suites.
17. The three temporary classrooms are proposed to be located to the south of the existing building, to the rear of the school, accessed via a bridge link to the main school building. The building would be sited on an area of amenity grassland, on the edge of the playing fields. The existing boundary fencing is proposed to be temporarily extended to include the temporary classrooms within the secure perimeter of the academy which separates the buildings and the playing fields. In addition to the fencing re-alignment, landscape and enabling works would be limited to a temporary access path and the provision of timber steps and a ramped access to the classrooms.
18. The three classrooms would be contained within two buildings, one measuring 9.8m x 16.8m (32.1ft x 55.1ft), which would accommodate two classrooms, storage and circulation space, and the other measuring 9.8 x 10m (32.1ft x 32.8ft), which would accommodate one classroom, storage and circulation space. The total floorspace proposed is 210sqm (2260sqft). The applicant advises that the buildings external walls would be coloured with a standard finish such as ivory or gunmetal, and window and doors would be white UPVC.
19. As outlined in paragraphs 11 & 12 above, the applicant is also proposing a package of measures in an effort to mitigate the access implications associated with the increase in pupil numbers at the site as a result of the additional intake in 2016 and over previous years (184 additional pupils in total over the 950 school capacity of the buildings permitted in 2012).
20. First, an onsite footpath link is proposed to be created to link the Academy site with PROW DR118A at its western end adjacent to Tredegar Road. The route would follow an existing desire line through the treed embankment to the north of the site, and would

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

be stepped and surfaced with compacted aggregate, with timber bargeboard edging. The applicant advises that the proposed route would have a negligible impact upon existing trees and wildlife habitat as it would follow an already trodden pathway. The route between the academy building and the point where it joins the PROW would measure 214.49metres (703.72ft), in comparison to a 334.65metre (1097.93ft) route from the academy building to the same point on the PROW but via Common Lane.

21. Public Right of Way (PROW) DR118A, which extends along the northern boundary of the Academy site between Common Lane to the east and Tredegar Road to the west, currently has an unmade surface. It is proposed to surface the extent of the PROW with a compacted aggregate surface, with timber barge board edging, to match that of the proposed onsite footpath link.
22. It is also proposed to widen approximately 70 metres of the existing footway at the junction of Common Lane and Parsons Lane, extending south on Common Lane towards the academy entrance. An existing area of uneven and overgrown verge between the boundary fencing of WGSG and the public footpath would be cleared and levelled, and thereafter resurfaced to widen the footway.
23. Two additional dedicated bus bays are also proposed within the academy site to separate bus and car drop off areas (currently combined) to create a freer flow of traffic onsite. The bus bays are proposed to the north east of the existing drop off area, and would be created by adding a second shorter link road between the entrance road into the site and the road leading to the exit. An area of hard standing would be provided for pupils to wait safely off of the road way and a zebra crossing is proposed to enable pupils to cross the bus drop-off link road safely to access the academy building.
24. With regard to the existing car accessed pupil drop-off/pick-up area, I am advised by the applicant that this is currently only available for use at the morning peak period. As part of this proposal, the Academy have agreed that the facility would also be made available for use at the afternoon peak period, and would be managed by academy staff.
25. Lastly, the Academy has updated its School Travel Plan and signed up to initiatives and commitments to improve pedestrian safety. The Academy (and WGSG) have committed to monitor inappropriate parking by parents in the area at the beginning and end of the school day, to oversee pupils crossing Common Lane to access PROW DR118A, and to collaborate with surrounding schools and local bus operators to better manage and coordinate bus movements. In addition, a joint venture between the Academy and WGSB would manage pupil flows at the existing zebra crossing on Common Lane in order to improve pupil safety and to reduce traffic delays. Further, pupils from the Academy and WGSB would be encouraged to use the proposed onsite footpath link to the PROW as opposed to Common Lane. The footpath link would be accessible for use between the hours of 0730 and 0930 on term time mornings and between 1430 and 1630 on term time afternoons. I am further advised that the route would be available for use by pupils of other local schools, including those at Wilmington Primary School.

The application is supported by a Design and Access Statement, Green Belt and Playing Field Policy Statement, Supplementary Green Belt Statement, School Travel Plan (including amended/updated version), Education Justification Statement, Transport Assessment, Transport Assessment Addendum, Arboricultural Implications Assessment, Ecological Assessment, and Supplementary Planning Statement.

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

Planning Policies

- 26.(i) **National Planning Policies** – the most relevant National Planning Policies are set out in the **National Planning Policy Framework (March 2012)**, and the **National Planning Policy Guidance (March 2014)**, which set out the Government’s planning policy guidance for England at the heart of which is a presumption in favour of sustainable development. The guidance is a material consideration for the determination of planning applications but does not change the statutory status of the development plan which remains the starting point for decision making. However the weight given to development plan policies will depend on their consistency with the NPPF (the closer the policies in the development plan to the policies in the NPPF, the greater the weight that may be given).

The NPPF states that, in determining applications, local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible.

In terms of delivering sustainable development in relation to this development proposal, the NPPF guidance and objectives covering the following matters are of particular relevance:

- achieving the requirement for high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
- the great importance the Government attaches to Green Belts, with the fundamental aim of Green Belt Policy being to prevent urban sprawl by keeping land permanently open;
- consideration of whether the opportunities for promoting sustainable transport have been taken up and safe and suitable access to the site can be achieved for all people;

In addition, Paragraph 72 states that: *The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local Planning Authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should give great weight to the need to create, expand or alter schools, and works with schools promoters to identify and resolve key planning issues before applications are submitted*

- (ii) **Policy Statement – Planning for Schools Development** (15 August 2011) which sets out the Government’s commitment to support the development of state-funded schools and their delivery through the planning system.

Development Plan Policies

- (iii) The adopted **1995 Dartford Borough Council Local Plan (Saved Policies September 2011)**:

Policy B1 Development proposals should be appropriate for the location and should not have a detrimental amenity impact on the local area. A high standard of design should be implemented in proposals with

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

layout, materials, adequate infrastructure, access and parking taken into consideration.

Policy S4 There is a presumption against development in the Metropolitan Green Belt, as defined in the Local Plan; continued protection will be given to the Countryside and its amenity value and recreation potential will be enhanced.

Policy S6 Development proposals should conserve and improve the existing built environment and a high quality and standard of design shall be achieved in new development.

Policy T19 Development proposals should be appropriately related to the highway network and not generate volumes of traffic in excess of the capacity of the highway network.

Policy T23 Development proposals should include adequate off-street parking facilities.

Policy T27 Development proposals shall make adequate provision for pedestrians.

(iv) The adopted **Dartford Borough Core Strategy (2011)**

Policy CS13 Seeks to resist inappropriate development within the Green Belt, in accordance with the NPPF.

Policy CS15 Pledges support for minimising the need to travel and minimising car use, whilst making effective use of the transport network. Travel plans will be required for all significant traffic generating development to ensure more sustainable modes of transport are pursued. Kent County Council's parking standards will be applied.

Policy CS21 Seeks the provision of community facilities that are close to the population they serve and that come forward in a timely fashion. Dual use of facilities is sought.

(v) Emerging **Dartford Development Policies Plan (Publication (pre-submission) Document December 2015)** (This document was submitted to the Planning Inspectorate in June 2016 and an Examination is due to commence in October 2016, with the plan expected to be adopted by Dartford BC towards the end of 2016 or early 2017.)

Policy DP1 Presumption in Favour of Sustainable Development: States that the Plan is written in accordance with national objectives to deliver sustainable development. A positive approach to considering development proposals will be had, reflecting the presumption in favour of sustainable development contained in the NPPF and the development needs of the Borough set out in the Core Strategy.

Policy DP2 Good Design in Dartford: Development will only be permitted where it satisfies the locally specific criteria for good design in the Borough by (a) reinforcing and enhancing localities to create high quality places,

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

(b) ensuring heritage assets are retained, re-used and respected, (c) facilitating a sense of place through a mix of uses and careful design, (d) providing clear pedestrian and cycle linkages and permeability, active frontages and a mix of buildings and spaces. Provides further advice about determining planning applications in relation to scale, massing, form, materials, Conservation Areas and areas of heritage sensitivity, inclusive, safe and accessible places, management of natural resources and flood alleviation, and appropriate signage and advertisements.

Policy DP3 Transport Impacts of Development: Development will only be permitted where it is appropriately located and makes suitable provision to minimise and manage the arising transport impacts, in line with Core Strategy Policies. Localised residual impacts on the highway network should be addressed by well-designed off site-transport measures and adverse impacts on residential amenity or the environment must be minimised. Development will not be permitted where the localised residual impacts from the development, on its own or in combination with other planned development in the area, result in severe impacts on one or more of the following: (a) road traffic congestion and air quality (b) safety of pedestrians, cyclist and other road users and (c) excessive pressure for on-street parking.

Policy DP4 Transport Access and Design: Development should be of a design and layout to promote walking, cycling and use of public transport through provision of attractive and safe routes. Proposals should also include appropriate vehicular access arrangements. Development will only be permitted where proposals ensure that the layout and siting of access is acceptable in terms of residential amenity, highways capacity and safety, free flow of traffic, cyclists and pedestrians, and visual impact.

Policy DP5 Environmental and Amenity protection: Development will only be permitted where it does not result in unacceptable material impacts, and consideration must be given to potential amenity/safety factors such as traffic, access and parking, anti-social behaviour and littering, and intensity of use (amongst other matters).

Policy DP22 Green Belt in the Borough: Sets out 12 aspects against which development in the Green Belt will be assessed, including criteria to assess development considered as potentially not inappropriate by the NPPF; those developments that support Core Strategy Policy CS13; the re-use of existing permitted permanent buildings; taking account of the character and scale of existing buildings; criteria relating to extensions to buildings or infilling of previously developed sites; the replacement of buildings; ensuring no loss of the best and most versatile agricultural land; criteria for proposals for farm diversification; the use of land for horses or the erection of stables; outdoor sports and recreation uses; and the infrastructure required for such uses.

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

Consultations

27. **Dartford Borough Council** raise objection to the proposal and comment as follows:

“In the opinion of Dartford Borough Council the location of the proposed portacabins would represent inappropriate development within the Green Belt contrary to paragraph 89 of the NPPF. The portacabins would result in development encroaching even further into the Green Belt away from the existing built up confines of the school site, which would harm the openness and appearance of the Green Belt. Dartford Borough Council objects to the proposal and request that the applicants consider a revised siting of the temporary portacabins to locations elsewhere within the Wilmington Academy site, in order to minimise the impact on the openness of the Green Belt.

Dartford Borough Council’s aerial photos appear to show that the proposed portacabins would also encroach upon an existing cricket pitch, but the submitted drawings show that the portacabins would not affect any sports pitches. KCC need to ensure that the proposal would not result in the loss of any sports pitches at the Academy.

Whilst it is considered that there are potential areas for car park expansion within the Academy site, it is recognised that the proposed traffic mitigation measures proposed within the application site (i.e. the double bus stop within the Academy site – to the south of the nursery / pre/school buildings; the new pedestrian footpath within the site and the widening of the pavement in Common Lane) would negate the impact of not providing any additional car parking, at least for the upcoming school year (2016 / 2017).

In spite of the above comments if KCC approved the proposal, Dartford Borough Council request that the portacabins only be granted a temporary one year permission and that all the proposed traffic mitigation measures are put in place before the portacabins are occupied.”

Wilmington Parish Council continue to raise strong objection to this application (and the other three applications currently being considered by the County Council for the expansion of the Academy and the Girls Grammar School). Although the onsite footway link between the Academy building and PROW DR118A was welcomed by the Parish Council, and the revisions made in terms of mitigation were considered to be an improvement over the original submission, the Parish Council consider that they still do not fully address the illegal and dangerous situations that are currently being experienced, and which would be exacerbated should these proposals go ahead.

The Parish Council consider that this proposal, taken in conjunction with the proposed permanent extension at the Academy and the planned expansions to both Wilmington Grammar School for Girls and Wilmington Grammar School for Boys, is unacceptable in what is a rural community without the infrastructure to cope with such large scale development. Although the Parish Council accept that each application must be considered on its own merits, it is considered that the County Council should take an overview of all of the current plans and proposals in the local area including the expansions of the other Schools in the locality.

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The Parish Council further endorse and fully support the objections and concerns submitted by Wilmington Safer Streets (see below and Appendix 1) and urge that the County Council give them due consideration to ensure the safety of students and pedestrians and to maintain the quality of life of residents of the Parish.

A summary of the main points of concern and objection raised by Wilmington Parish Council to this application are as follows:

- Wilmington is fast becoming a 'no-go area', not only at peak school times but due in inconsiderate, and in some cases illegal parking, whenever the schools are open;
- The area has exceeded its ability to deal with the levels of traffic and associated parking, and promised improvements to alleviate the current problems have not materialised;
- The area is at saturation point, and it is time that there is an acceptance that further development in and around Common Lane is simply untenable, with a totally unacceptable impact on residents, whether due to traffic generation, the inability to successfully manage the traffic flow or the inadequate parking provision;
- For traffic to flow along Common Lane buses have no alternative other than to mount the pavement, a situation which places pedestrians in danger. However, installation of bollards or similar would simply mean that the road would come to a standstill as vehicles would be unable to pass each other;
- There would appear to be insufficient onsite parking to meet the increase in staffing level and sixth form students (who often drive to the Academy and other local schools);
- The proposed double yellow lines on Common Lane are not supported as they would have a detrimental impact on local residents (*not proposed as part of this application*);
- The onsite drop off loop should be available in the afternoon peak as well as the morning peak;
- The proposed onsite footpath link should be open to use by other schools, and managed/monitored to ensure that it is available for use at the appropriate times;
- The Academy has sent a letter to parents which states that works would commence during the summer holidays. This has thrown doubt on the transparency of the County Council's decision making processes;
- Access by construction vehicles should be restricted to avoid peak school times; and
- The County Council should hold a public exhibition/meeting to provide the local community with an overview of all four applications;

The Parish Council has also questioned why two nearby vacant school sites (one in Stock Lane, Wilmington, and the other in Egerton Avenue, Hextable) cannot be used to accommodate the additional pupils, either as new schools or as annexes to Wilmington Academy/Wilmington Grammar School of Girls.

Kent County Council Highways and Transportation initially objected to the application on grounds of additional trips generated, the inadequate mitigation proposed and the evident road safety issues on Common Lane.

However, following the submission of amendments to the scheme, including the mitigation measures outlined in paragraphs 19 through to 25 above, Highways and Transportation now raise no objection to this application and comment as follows:

“By way of background, I would like to draw your attention to our responses dated 16th June and 21st July 2016, each of which fully covered the highways

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issues and raised holding objections to this application on the basis of the additional trips generated, the inadequate mitigation proposed and the evident road safety issues on Common Lane which were not mitigated. The key highways issues are the need to consider this application alongside the other proposed temporary and permanent expansions of the Wilmington schools, as well as the continuing 'organic' growth of these schools outside of the need for planning permissions, and to fully investigate highway and safety improvements needed in the local area as a consequence of the above and to come up with a comprehensive package of mitigation measures which all stakeholders would play their part in delivering.

In line with this, our previous highways responses recommended a number of measures and investigations to be carried out including the widening of the footway and carriageway on Common Lane, the creation of a direct pedestrian link from Wilmington Academy to footpath DR118A and Tredegar Road and the construction of a pedestrian route parallel to Common Lane through the edge of the Girls' Grammar School site. In addition, recommendations included the need for a detailed assessment of the unmarked pedestrian crossing point across Common Lane at the start of footpath DR118A particularly in view of visibility for pedestrians, the active management of students using the zebra crossing outside the exit from the Academy, the establishment of a bus partnership to manage routing and safer driving practices and to review and update the Academy School Travel Plan to monitor and reinforce the above and to promote sustainable and safe travel practices.

Highways officers have undertaken numerous site visits, we have reviewed and appreciated the representations made by local people and we have attended meetings with the applicants and their transport consultants. I would also like to acknowledge the additional work which has now been produced by the consultants via their Supplemental Planning Statement dated 3rd August 2016, the work to prepare drawing 11231-T10 showing outline proposals for a potential widening of the carriageway and footway along Common Lane as well as the investigations into the creation of a pedestrian route parallel to Common Lane through the Wilmington Grammar School for Girls.

In terms of the number of students the applicants have now confirmed that from September 2016 there will be 1134 students on the school roll. The previous planning application for the Academy was based on 950 students. As such, the uplift at the Academy to be considered as part of this planning application is 184 students.

A key part of our discussions have focused on ensuring there is no further net increase in the number of students who walk along Common Lane in peak hours and to ensure safety improvements will be delivered in the near future.

The following is now proposed:

- A reduction in the number of temporary classrooms from 6 to 3 to limit the potential for further 'organic' growth.
- Provision of a new footpath link from footpath DR118A in the vicinity of Tredegar Road to the Academy site. I understand the Academy has agreed that this route would also be available to students at Wilmington Boys Grammar, accessible between the hours of 0730 - 0930 and 1430 – 1630

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and that they have been asked to also make this route available to all local students. This would enable a 'safer' pedestrian route to be created away from Common Lane.

- The widening of the footway on Common Lane between Parsons Lane and footpath DR118A up to the boundary fence. Importantly this would also enable visibility for pedestrians crossing Common Lane towards footpath DR118A to be improved. The visibility has been measured and would be 43m to the right (southbound traffic) and 55m to the left (northbound traffic), which accords with the standard required in Manual for Streets for a 30mph road.
- Provision of two additional dedicated bus bays within the Academy grounds to separate car and bus drop off to separate car and bus drop off facilities.
- An update of the Academy School Travel Plan to actively promote sustainable and safer travel including working with the local and school bus operators to better manage and co-ordinate bus movements, to actively discourage inappropriate parking, the management by staff of students at peak times at the zebra crossing adjacent to the exit from the Academy and a commitment to permit parents to use on-site drop off facilities during both the morning and afternoon peaks.

With the new link from footpath DR118A to the Academy site it has been estimated that there would be an overall net reduction of 98 pedestrian movements in each peak period along Common Lane and a reduction of 127 pedestrian movements crossing Common Lane at footpath DR118A. These numbers take into account students from the Academy and Boys Grammar. On this basis and on the basis that all of the measures outlined above can be conditioned to ensure an early delivery of the measures to improve sustainable access to the Academy and road safety I can confirm that the highways objection to this application is now resolved.

In addition to the above (outside of this planning application process) I understand that the Schools and nearby property owners have been required to cut back overhanging vegetation on Common Lane to reduce the likelihood of large vehicles overrunning the footway, that the County Council is investigating the potential for an additional formal pedestrian crossing on Common Lane in the vicinity of Wilmington Primary School supported by the local County Councillor and that proposals to enhance parking restrictions to reduce the likelihood of inappropriate parking and to refresh worn road markings are also being progressed.

For the avoidance of doubt please note that this in no way represents an overcoming of the highways concerns in respect of the proposed permanent expansions for the Wilmington Schools. With this in mind we look forward to further feasibility investigations continuing into the potential widening of the footway and carriageway on Common Lane and the potential creation of a footpath through the Wilmington Grammar School for Girls site."

Sport England raises no objection to the application subject to a condition being attached to the decision notice (should permission be granted) requiring the removal of the temporary buildings from site by 1 September 2017, and the subsequent reinstatement of the area as playing field.

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Although the application would result in a temporary loss of a usable part of playing field (as defined by Sport England), Sport England have considered the following:

- The temporary reduction in the area of playing field associated with the proposals is unlikely to have a significant impact on the sites ability to accommodate cricket for the current year as four wickets would still remain in the closest pitch to the proposed development. The England and Wales Cricket Board (ECB) have confirmed that four wicket strips would allow play;
- The clearance distance required by the ECB would still be met; and
- The development would be temporary and it is expected that the area would be restored as playing field use at the end of the temporary period.

The County Council's Biodiversity Officer raises no objection to the application and considers that no further information needs to be submitted. The precautionary measures outlined in the submitted Ecological Assessment must be implemented during the 'construction' of the footpath link onsite, and works should be undertaken outside of the bird breeding season (March to August) unless supervised by an experienced ecologist. Some ecological enhancements are recommended within the submitted Ecological Assessment, and further consideration should be given to the provision of those, and other enhancement measures.

Public Rights of Way supports the application and requests that an informative be placed on any forthcoming decision advising the applicant of the requirement to seek the relevant approvals from the County Council's PROW team with regard to undertaking any works within or adjacent to the boundaries of the PROW.

I have also received 9 representations from **Wilmington Safer Streets** who strongly object to this application, and the other three applications that the County Council are currently considering at the Academy and Girls Grammar School. Wilmington Safer Streets is a local group set up to campaign for the improved safety of the streets of Wilmington, and at the time writing this report has 475 members.

A copy of a full representation from Wilmington Safer Streets can be found in Appendix 1 of this report, but the key points of concern and objection regarding this particular application are summarised within paragraph 34 of this report, along with a summary of individual neighbour representations (many are also members of Wilmington Safer Streets, and the same points of objection and concern were raised by all).

Local Member

28. The local County Member, Mrs Ann Allen, was notified of the original application on the 18 May 2016. Further notifications regarding the amended proposals were sent on the 12 July 2016 and 8 August 2016.
29. The two Dartford Borough Council Members for the ward of Wilmington, Cllr Eddy Lampkin and Cllr Derek Hunnisett, have raised objection and concern regarding the proposal and have expressed their full support for the views of Wilmington Parish Council, Wilmington Safer Streets, and local residents.

Publicity

30. The original application was publicised by the posting of 3 site notices and advertisement in a local newspaper. The amended proposal (addition of 2 bus bays, a

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footpath link between the rear of the school and Public Right of Way DR118/118A, and widening of a section of footway on Common Lane) was publicised by the posting of 3 site notices, advertisement in a local newspaper, and the individual notification of 16 neighbouring properties.

31. Planning Application reference KCC/DA/0085/2016 for a permanent classroom block to facilitate expansion of Wilmington Academy was received and publicised at the same time by the posting of 3 site notices, advertisement in a local newspaper and the individual notification of 19 local properties.

Representations

32. In response to the publicity, 20 letters of representation have been received from 13 local addresses specifically regarding this application, in addition to two letters questioning the extent of consultation and validation processes. This is in addition to the 9 representations from Wilmington Safer Streets (see paragraph 27 above and Appendix 1).
33. Due to the fact that the two Academy applications (KCC/DA/0088/2016 & KCC/DA/0085/2016) were submitted at the same time, in addition to the two applications at Wilmington Grammar School for Girls (KCC/DA/0090/2016 & KCC/DA/0091/2016) the majority of the representations received relate to both this application for the temporary building and also the proposed permanent extension and, in many cases, all four applications. In total, I have received in excess of 60 letters of representation regarding the proposed expansion of Wilmington Academy.
34. The key points raised by Wilmington Safer Streets and local residents with regard to this application are summarised as follows:

Highway/Access Matters

- Common Lane is a narrow lane, too narrow for vehicles to pass, resulting in buses and large vehicle having to mount the pavement;
- At peak school times the pavements are heavily used due to the amount of schools in the immediate locality;
- Pedestrians, including pupils, have been hit by buses/coaches as they have mounted the kerb;
- The pavements on Common Lane are narrower than the recommended width in places, and are only on one side of the road;
- None of the proposed mitigation addresses the dangerous issue of vehicles mounting the pavement to pass each other;
- A weight restriction needs to be introduced on Common Lane to prevent lorries from accessing the road as they currently conflict with school traffic on a daily basis (over 100 lorries a day use the road);
- Buses should be banned from Common Lane and a bus/coach park provided on Oakfield Lane, or at the least the road should be made one way to prevent vehicles having to pass each other;
- The roads around the Wilmington Schools are already chaos at peak school times, and literally at grid lock;
- There are 3 Secondary Schools, a Primary School and a Nursey all accessed from Common Lane, the road cannot accommodate anymore;
- The village of Wilmington cannot support 3 Secondary Schools so pupils are bussed in or brought by car, few pupils are within walking distance;

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- Those that can walk to school often don't as it is too dangerous;
- Common Lane is already a dangerous road at peak school times, expansion of the Academy would only make this worse;
- A 20mph speed limit should be introduced on Common Lane;
- Parents and sixth formers park dangerously and in some cases illegally, blocking access for local residents, and more importantly emergency services;
- Paths are blocked by parked cars, resulting in people (including Primary School Children) having to walk in the road;
- The drop off loop on the Academy site needs to be made available for use at the afternoon peak, not just the morning peak as is currently the case;
- Double yellow lines should not be provided along the edge of the Common as this would inconvenience residents who need to park in the evenings/weekends, and also would just relocate the parking problem to other local roads;
- An additional crossing needs to be provided, especially in close proximity to the Primary School;
- Decent footpaths and cycle ways need to be provided to encourage pupils to travel to school sustainably;
- Roads and pavements are already in a poor state of repair;
- A footway to the rear of the Academy is desperately needed and is a welcomed addition to the plans;
- The footway within the Academy site must be made available for use by pupils from other schools, and should be monitored and maintained;
- Crossing Common Lane to get to PROW DR118A (and visa versa) is dangerous at the brow of a hill on a bend, and visibility splays are inadequate;
- PROW in the area are poorly lit, reducing their use;
- The Transport Assessments are inaccurate and do not represent the real situation;
- None of the Schools in Wilmington show any commitment to keeping their Travel Plans up-to-date, so how can this be relied on as a mitigation measure;
- School monitoring of parent parking is not enforceable;
- There is inadequate signage on Common Lane to warn drivers of children crossing;
- Vegetation along Common Lane needs cutting back as overhanging vegetation further narrows the carriageway;

Other Matters

- There are two empty schools within three miles of the Academy, one of which only closed in recent months and was a secondary school so must have the accommodation required for these additional pupils;
- The village is becoming overdeveloped which is ruining its rural character and destroying the community;
- All of the applications for development and expansions of the Wilmington Schools (WGSB, WGSG, the Nursery and the Academy) should be considered together, not in a piecemeal fashion;
- The residents of Wilmington have not been considered at all, and the proposals have not been sufficiently advertised;
- The Academy have already recruited staff and advised parents that this development is going ahead – it's a fait accompli;
- Air pollution is already high in the area;
- Litter and antisocial behaviour is already an issue;

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Discussion

35. In considering this proposal regard must be had to the Development Plan Policies outlined in paragraph 26 above. Section 38(6) of the 2004 Planning and Compulsory Purchase Act states that applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. Therefore, this proposal needs to be considered in the context of Development Plan Policies, Government Guidance, including the National Planning Policy Framework (NPPF), and other material planning considerations arising from consultation and publicity. Issues of particular relevance include impact upon the Metropolitan Green Belt, highway implications and access, loss of playing field, general amenity matters, and whether the development is sustainable in light of the NPPF.
36. Dartford Borough Local Plan Policy B1 seeks to conserve and enhance the environment and requires developments to be sustainable, well designed and respect their setting. This is particularly relevant to this development site which is identified within the Local Plan as being within the Metropolitan Green Belt. Policy CS13 of the Dartford Borough Core Strategy seeks to resist inappropriate development within the Green Belt, unless justified by exceptional circumstances.
37. The NPPF, section 9, paragraph 80 states that the Green Belt serves five purposes:
- a. to check the unrestricted sprawl of large built up areas;
 - b. to prevent neighbouring towns merging into one another;
 - c. to assist in safeguarding the countryside from encroachment;
 - d. to preserve the setting and special character of historic towns; and
 - e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The NPPF further states that “as with previous Green Belt Policy, inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances”. The NPPF does not explain in any detail what ‘very special circumstances’ means, but does go on to say “very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations”. Any built development within the Metropolitan Green Belt could affect the openness of it and would be contrary to planning policies. On this basis the development proposed must be considered as a departure from the Development Plan. However, the need, or otherwise, to refer this application to the Secretary of State for his consideration will be assessed and discussed below

Green Belt Considerations

38. By virtue of the criteria in the NPPF, and various Local Plan Policies, the development is considered to be inappropriate in Green Belt terms. Although paragraph 89 of the NPPF lists examples of development that could be considered appropriate within the Green Belt, I am of the view that the proposals would not meet these exceptions and that the development is, therefore, inappropriate development in the Green Belt. Inappropriate development is, by definition, harmful to the Green Belt and it is for the applicant to demonstrate why permission should be granted with regard to planning policies and other material considerations. Such development should not be approved, except in very special circumstances. It is, therefore, necessary to consider the impact of the development on the openness of the Green Belt and whether or not there are very

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special circumstances that would warrant setting aside the general presumption against inappropriate development.

39. A Green Belt Policy Statement, and Supplementary Green Belt Assessment was submitted in support of this application, which sets out what the applicant considers to be the very special circumstances that warrant setting aside the general presumption against what would be inappropriate development in the Green Belt. The applicant considers the following 'very special circumstances' are sufficient to collectively outweigh a Green Belt policy objection:
- i) The identified need for additional Secondary School places within the Dartford Borough;
 - ii) National Policy and Central Government Support for the delivery of State Funded Schools;
 - iii) A lack of suitable alternative development options; and
 - iv) The limited impact of the development on the openness of the Green Belt.
- Each of these 'very special circumstances' as put forward by the applicant will be considered and discussed in the following section of this report. I will take each point in turn, first considering the case of need for school places in the Dartford Borough.

Case of Need and National Policy and Central Government Support for the delivery of State Funded Schools

40. As outlined in paragraph 26 of this report, great emphasis is placed within planning policy generally, specifically paragraph 72 of the NPPF, on the need to ensure that a sufficient choice of school places is available to meet the needs of existing and new communities. The NPPF states that Planning Authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. The NPPF further states that Planning Authorities should give great weight to the need to create, expand or alter schools. The Policy Statement – Planning for Schools Development (15 August 2011) also sets out the Government's commitment to support the development of state funded schools and their delivery through the planning system.
41. As outlined in paragraphs 6, 7 & 8 of this report, a number of Schools within Wilmington and the surrounding local area are proposed for expansion at this time. Kent County Council, as the Strategic Commissioner of Education Provision in the County, is responsible for ensuring that there are sufficient school places of high quality for all learners. The applicant advises that this application is proposing temporary classrooms to provide additional teaching facilities to meet the curriculum requirements for the September 2016 pupil intake. Further permanent expansion is proposed under a separate planning application (KCC/DA/0085/2016) which is yet to be determined. However, the applicant advises that the following case of educational need applies to this temporary accommodation proposal as well as the permanent proposals.
42. As set out by Kent County Council Education, the Wilmington and South Dartford urban areas have been seeing an upsurge in demand for secondary school places. This increase in indigenous demand is caused by changing demographics in the area. In addition, there is new demand from the large and medium scale housing and urban developments which are taking place in the area. This growth is bringing new families to the Dartford Borough requiring enhancements to the infrastructure in order to meet the future needs of the town and its residents. Consequently, there is a forecasted deficit of secondary school places for the Dartford urban area from 2016 onwards. The applicant advises that the forecasts for the Borough of Dartford support the view that without the

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expansion of Wilmington Academy, the Education Authority would fail to meet its statutory obligations to provide sufficient school places in the area. I am further advised that the Education Authority has given careful study to all the options available and is of the firm opinion that expanding Wilmington Academy is one of a number of school expansions that are necessary within the Dartford area. The applicant considers that if this proposed expansion does not proceed, the deficit of places will worsen because of the limited options for alternative expansions within the wider Dartford Borough area.

43. In summary, the applicant advises that the expansion of Wilmington Academy is proposed due to a number of key factors:
- (1) Increased demand in Dartford town and surrounding areas means that there is very little choice for parents;
 - (2) Wilmington Academy sits very close to the area of greatest need;
 - (3) The size of the existing School buildings is not adequate.
44. Based on the above, in my view, it is evident that a clear case of need for additional secondary school places within Dartford exists. Much of the Borough is within the Metropolitan Green Belt and it needs to be borne in mind that the Green Belt covers a wide area where people live and that these people need local school facilities just as much as those outside of the Green Belt. The applicant has demonstrated that there is an existing shortfall of places within the local area, and a future need which will be further outstripped by demand unless additional places are provided. Support for the provision of school places is heavily embedded in the NPPF and local Planning Policy, and I consider that the need for the development should be given significant weight in this instance.

Alternative Development Options

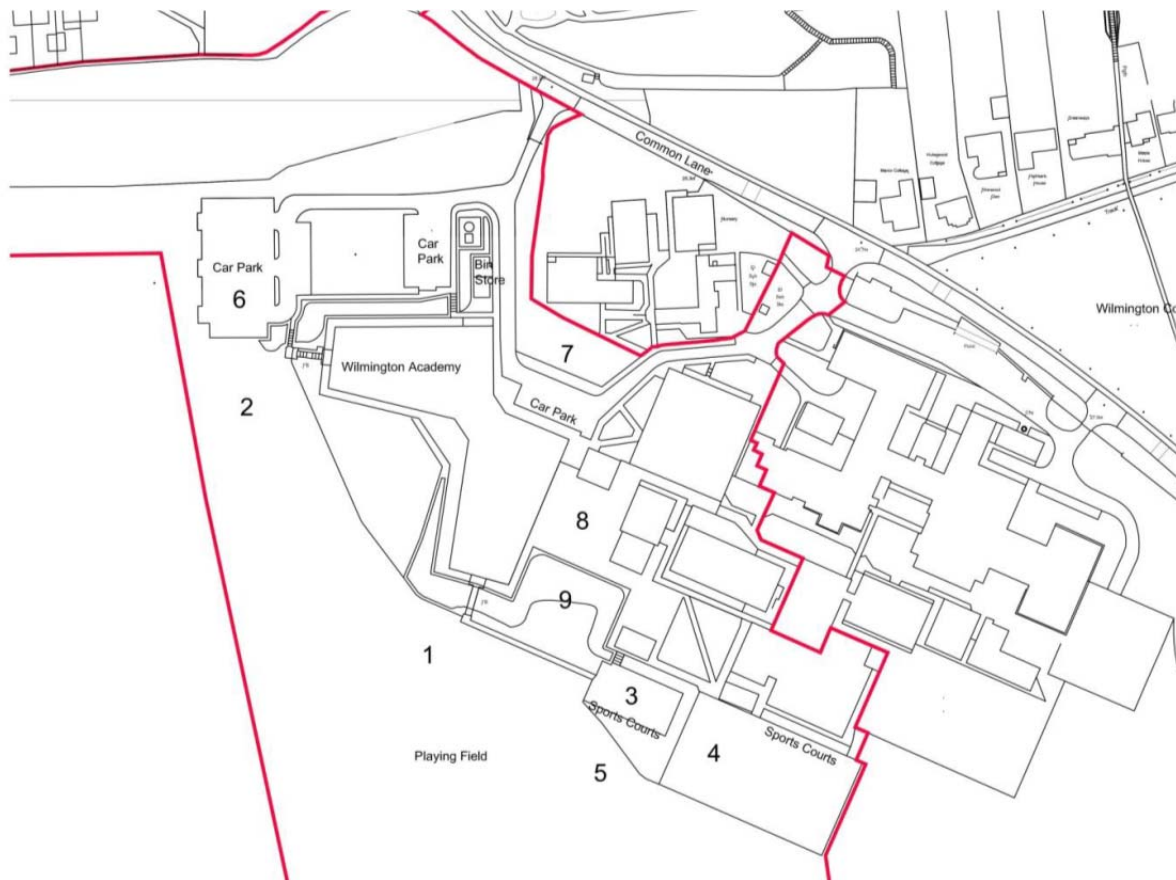
45. As part of the applicant's case of very special circumstances, alternative development options have been assessed and the applicant has concluded that the development as proposed is the only viable option available. Having accepted a need for additional school places within the Dartford Borough, and consequently a need for additional places to be provided at Wilmington Academy (in addition to other local schools) the development options available must be discussed. First, Wilmington Parish Council, Wilmington Safer Streets, the Borough Council Members for the ward of Wilmington and local residents have questioned why the additional school places cannot be accommodated at two nearby vacant school sites, either as new standalone schools or as annexes to the Academy (and/or other local schools).
46. The Area Education Officer was asked to provide a response to the suggestion that the former Rowhill School site in Stock Lane Wilmington and/or the former Hextable School (Oasis Academy) site in Egerton Avenue, Hextable, be used as new school sites or as a satellite for either the Grammar School or the Academy. With regard to the opening of a new school at either site, it is important to note that under current legislation, a new school can only be opened as a free school. In considering this Central Government legislation, it is not considered that a free school could be established and set up in time to meet the urgent demand for places. Further, with regard to the Hextable site, the applicant advises that use of that site was further discounted because the Swanley/Hextable area is adequately served by the Orchard Academy in Swanley. The Hextable site is outside of the Dartford catchment area and, in addition, the most expedient route from Dartford to Hextable is through the village of Wilmington. In any instance, the applicant advises that the accommodation on the Hextable site is dated and would require a multi-million pound refit for it to meet modern infrastructure needs.

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The setting up of a new school at either site is therefore not practicable within the required times frames due to the Government's Free School initiative, and further the Hextable site is outside of the catchment area that it would need to serve.

47. The site of the former Rowhill School in Stock Lane, Wilmington, is within the catchment area for Dartford. Whilst it could not be established as a new school for the reasons outlined above, its use as an Annexe needs to be considered. The applicant advises that the buildings on that site were last used approximately 5 years ago as a Pupil Referral Unit and before that as Rowhill Special School. There are two main single storey buildings on the site, one built in 1973 and one in 2001, with a site size of 1.48 hectares (3.66 acres). The applicant considers that there are three reasons why the site would not be appropriate as a satellite. First the existing buildings and building footprint do not lend themselves to secondary school use, having been designed originally to facilitate special school education. The applicants accept that the buildings could conceivably be adapted for *primary* aged pupils but that it would be expensive to adapt or rebuild the facilities for *secondary* use. Secondly, two alternative uses for that site are currently being considered, which are to retain it for use as a new primary Free School or to sell the site for a capital receipt. Thirdly, to use that site as an annexe would see the constant movement of students between the two sites, making it unnecessarily operationally inefficient.
48. Other concerns with using the site as an annexe are the sustainability issues of having two administration bases, the need for costly duplication of facilities such as the canteen, sports facilities and specialist teaching accommodation, and the potential need for students to be transported between the two sites several times a day. In summary, it is considered that the site would not lend itself to secondary education as an annexe for the reasons outlined above, and would not be a workable solution for either the Academy or the Grammar School. Under the circumstances, I accept that the Rowhill site does not offer a workable or deliverable alternative to the current proposal.
49. Having accepted that offsite alternatives are not practicable, development options within the existing Academy site must be considered. Although the whole of the Academy site is within the Green Belt, arguably development in some areas of the site would have a lesser impact on the openness on the Green Belt than others. Dartford Borough Council object to this proposal and request that the applicants consider a revised siting of the temporary classroom buildings to a location elsewhere within the Wilmington Academy site, in order to minimise the impact on the openness of the Green Belt. However, the applicant advises that alternative sites within the academy grounds were considered, as shown on the map below.

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50. Site 1 on the map is the proposed location of the temporary classrooms buildings, and sites 2 through to 9 are the alternative locations considered. The applicant advises that the possible alternative sites were discounted for the following reasons:

“Site 2 - Existing wildflower meadow, conditioned as part of a previous planning approval with tree to the centre and a steep topography. Unsuitable for selection.

Site 3 - Existing hard ball court. Loss of hard play space and sport facility unacceptable.

Site 4 - Existing hard playground and sports courts. Loss of hard play space and sport facility unacceptable.

Site 5 - Future proposed expansion to hard ball court (separate application) which would also be utilised as the main contractor compound for the main expansion development (separate application) – selection would restrict ability to construct main expansion proposal (should permission be granted) therefore selection unacceptable.

Site 6 - Existing car park. Selection would result in loss of significant number of car parking spaces and therefore selection is unacceptable.

Site 7 - Grass slope to the front of the school. The area is identified to accommodate a bus pull in bay for 2 buses as part of this application therefore selection is unacceptable.

Site 8 - Area of existing hard landscape between existing buildings. Area was considered but due to the proximity of existing buildings, access points and the location of the proposed main expansion (separate application) it was determined that temporary buildings in this location would be difficult to remove once construction for the main block was underway and even when double stacked to reduce footprint would require more space than that was available. Therefore selection is unacceptable

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Site 9 - Existing grass spoil mound from previous development with areas of adjacent existing hard landscaping. This location is the proposed site for the main expansion development (subject to separate application) and is therefore unacceptable as it would prevent the construction of the proposed teaching block in this area (should permission be granted)."

51. The selection of location 1 is considered by the applicant to be not only the least intrusive location within the academy site, and also the only available and practicable location. Temporary buildings in the location proposed could be installed/removed with minimum disruption to the daily school activities, and the siting would also enable works to proceed on the main expansion scheme, should permission be granted. The proposed siting is also adjacent to an existing entrance point to the main building providing access to toilets and easy connection to power and data services. Its proximity to the main building would also necessitate only a limited extension of the existing fence line to bring the temporary classrooms within the secure boundary line of the school line. Further, the proposed siting would have no impact on existing trees and/or planting, a minimal impact on playing field provision (discussed later in this report), limited visual impact and would also not adversely affect the amenity of properties surrounding the school site.
52. In light of the above, I consider that the applicant has considered all reasonable alternative sites within the Academy grounds, and accept that the proposed location of the temporary buildings is, in the circumstances, the most viable option. However, the impact of the proposed temporary buildings on the openness of the Green Belt needs to be considered and assessed.

Impact on the Openness of the Green Belt

53. As referenced by Dartford Borough Council, this application proposes development that would encroach into the Green Belt, which could harm its openness. First, it is important to note that the site is well screened from public views by the existing academy buildings, and mature boundary planting and screening. However, openness of the Green Belt is described as an 'absence of development' irrespective of the degree of visibility of the land in question from public vantage points. Therefore, any physical development within the Green Belt, whether visible or not, would have some impact on the openness. Whether that impact is either acceptable or unacceptable is a matter of fact or degree based on the specifics of each case.
54. The proposed temporary classrooms would occupy a compact footprint and would be sited adjacent to the existing academy building, minimising encroachment into the undeveloped areas of the site. A reduction in the number of classrooms proposed from six to three has further reduced the development footprint over that originally proposed, and kept the amount of built development proposed to a minimum. The single storey buildings would be of a limited size and scale, and would be required to be removed from the site by the 1 September 2017 if permission is granted. I consider that alternative locations within the school site that could be argued to have a lesser impact on the openness of the Green Belt are not available or suitable to accommodate the temporary buildings and, in my view, the proposed location of the development would in fact have a very limited impact on the openness and functioning of the Green Belt. The contribution made by the academy site to the wider Green Belt would, in my view, be maintained by the proposed development, with the open areas of the site retained to the

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south and west, and built development contained to the north and east where it adjoins the built development of Wilmington and Dartford beyond.

Summary – Very Special Circumstances/Green Belt Considerations

55. Overall, I accept the applicant's assessment and application of Green Belt Policy as set out in the submitted documentation, and I have considered this in the context of the Development Plan Policy and the NPPF. The development is inappropriate development for the purposes of Green Belt Policy consideration and is, therefore, by definition potentially harmful. Nevertheless, in my view, the considerations summarised above are sufficient collectively to constitute 'very special circumstances' capable of outweighing harm, in this particular case. Furthermore, I accept that the particular siting and design of the proposals has been carefully considered to help mitigate the impact of the development on the functioning and openness of the Green Belt. Accordingly, I do not consider that an objection on Green Belt grounds would be warranted in this particular case.
56. Further, in assessing the need to refer the application to the Secretary of State for consideration, and having regard to the Town and Country Planning (Consultation) (England) Direction 2009, I do not consider that this application needs to be referred. The Direction requires inappropriate development to be referred where it consists of the provision of buildings where the floor space to be created is 1000 square metres or more, or any other development which, by reason of its scale or nature or location would have a significant impact on the openness of the Green Belt. The proposed temporary buildings have a combined total floor space of 210 square metres, well below the 1000 square metre threshold. Further, given the temporary nature of the development and the limited impact that the development would have on the openness of the Green Belt due to its limited size and scale, and location adjacent to existing built development, I consider that there is no requirement to refer the application in this particular case.

Access and Highway Matters

57. As outlined in paragraph 34 of this report, there is substantial local objection to this application, and to the principle of expanding the Academy and other Schools in the immediate vicinity, based primarily on highway safety grounds and access concerns. Wilmington Parish Council, Wilmington Safer Streets and the two Dartford Borough Council Members for the ward of Wilmington (Cllr Hunnisett and Cllr Lampkin) also raise strong objection to this application on the same grounds (in addition to the application for permanent development at the Academy and the two proposals of Wilmington Grammar School for Girls (WGSG)). As set out in more detail within the earlier sections of this report, the primary points of concern and objection relate to a lack of capacity of local roads, and highway and pedestrian safety.
58. Many of the objections relate to the principle behind the permanent expansion and the wider implications of the proposed expansions of other Schools within Wilmington. As outlined in paragraphs 6 & 7 of the report, the County Planning Authority are currently in the process of considering applications for permanent accommodation to facilitate expansions of both Wilmington Academy and Wilmington Grammar School for Girls. Both of those applications have met with significant local objection on access and highway safety matters, in addition to concerns and points of objection raised by Kent County Council Highways and Transportation. The applicant is in the process of considering further potential mitigation measures in an effort to address those concerns and objections, which would be subject to consultation with statutory consultees and the

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local community when submitted. Those applications for permanent development would have to address in detail the impact that a permanent expansion would have on the local highway network, and mitigate any such impacts. Local objections relating to the need for speed limit changes, weight restrictions, additional onsite car parking, parking restrictions in local roads, and the removal of buses from Common Lane would all be considered and addressed in the determination of those permanent applications. Those applications will be determined on their own merits in due course and would not be pre-determined by a decision on this application.

59. This application is proposing to provide three temporary classrooms to accommodate the September 2016 additional pupil intake and previous intakes over and above the 6FE original pupil admission number (PAN) of 180 pupils per academic year. The applicant advises that that equates to an additional 184 pupils over and above the 950 capacity of the accommodation approved under application reference DA/12/14, with a projected school roll of 1134 in September 2016. Therefore, in determining this application, the impact of an additional 184 pupils needs to be considered and addressed. It should also be borne in mind that the temporary classrooms would be required to be removed from site on or before 1 September 2017. Future intakes beyond 2016 are therefore not relevant to the determination of this application.
60. As can be seen from the Highway and Transportation comments set out on paragraph 27 of this report, when originally submitted this application met with objection from Highways and Transportation due to highway safety and capacity concerns. As outlined in paragraphs 9 through to 12 of this report, as a result of the Highway and Transportation objection, and the significant objections from the local community including the Parish Council, the applicant spent a considerable amount of time discussing the proposal with Highway Officers in an effort to identify improvements that could be made to improve the safety of pedestrian access and to help ease the congestion on Common Lane. Two separate packages of mitigation measures were submitted as a result of these discussions (set out in detail in paragraphs 20 to 25 of this report), and collectively these will be discussed and outlined below.
61. First, an onsite footpath link is proposed to be created to link the Academy site with PROW DR118A at its western end adjacent to Tredegar Road. The route between the academy building and the point where it joins the PROW would measure 215metres (704ft), in comparison to a 335metre (1098ft) route from the academy building to the same point on the PROW but via Common Lane. Pupils from the Academy and WGSB would be encouraged to use the proposed onsite footpath link to the PROW as opposed to accessing the PROW via Common Lane. In addition, the applicant has confirmed that the footpath link would be accessible for use between the hours of 0730 and 0930 on term time mornings and between 1430 and 1630 on term time afternoons. I am further advised that the route would be available for use by pupils of other local schools, including those at Wilmington Primary School. It should be noted that the provision of this onsite link and its availability for use by other schools has been welcomed by the local community.
62. The applicant has demonstrated that the provision of the onsite footpath link would reduce the number of pupils using the footway on Common Lane to below the current level of use. Reducing the number of pupils using the footway on Common Lane is a key factor in mitigating the impact of this proposal due to the existing safety issue of buses mounting that stretch of pavement to pass each other. Any reduction in its use is welcomed. Further, PROW DR118A is proposed to be surfaced with a compacted aggregate, with timber barge board edging, to match that of the proposed onsite

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footpath link. It is also proposed to widen approximately 70 metres of the existing footway at the junction of Common Lane and Parsons Lane, extending south on Common Lane towards the academy entrance. Both of these latter mitigation measures would ease the use of PROW DR118A, with surfacing encouraging use during more inclement weather, and removal of vegetation and widening of the footpath on the Parsons Lane/Common Lane junction not only providing a wider and safer footpath, but allowing a much improved visibility splay for those students who cross Common Lane to join PROW DR118A as its eastern end. The County Council's Public Right of Way team support this application but, should permission be granted, an informative is required to advise the applicant of the requirement to seek relevant approvals from the PROW team with regard to undertaking works to the PROW.

63. In addition to the above initiatives proposed to mitigate the impact of additional pedestrian movements, the applicant has also proposed to provide two additional dedicated bus bays within the academy site to separate bus and car drop off areas (currently combined) to create a freer flow of traffic onsite. Further, and as requested by the local community, the existing car pupil drop-off/pick-up area, which is currently only open during the morning peak, is proposed to be made available for use during the afternoon peak period, and would be managed by academy staff. Both of these measures would ease traffic movement within the site, minimising queueing at the site entrance back onto Common Lane, and would remove waiting vehicles from Common Lane in the peak afternoon period.
64. Lastly, the Academy has updated its School Travel Plan and signed up to initiatives and commitments to improve pedestrian safety. The Academy (and WGSG) have committed to monitor inappropriate parking by parents in the area at the beginning and end of the school day, to oversee pupils crossing Common Lane to access PROW DR118A, and to collaborate with surrounding schools and local bus operators to better manage and coordinate bus movements. In addition, a joint venture between the Academy and WGSB would manage pupil flows at the existing zebra crossing on Common Lane in order to improve pupil safety and to reduce traffic delays.
65. Highways and Transportation has assessed the appropriateness and effectiveness of the mitigation measures proposed by the applicant, and subsequently have withdrawn their objection to this application. It is considered that the initiatives proposed would improve sustainable access to the Academy and highway safety. This conclusion is based on an assessment of the impact of an additional 184 pupils only, and does not consider any increase beyond that. As discussed earlier in this report, and for the avoidance of doubt, should permission be granted the temporary classrooms would be given a temporary one year permission only. Should the applicant wish to retain the buildings beyond 1 September 2017 an application would need to be submitted which would have to assess the impacts of any additional pupil intake over and above that proposed as part of this application.
66. In this case, I am satisfied that the applicant has demonstrated that the provision of the temporary buildings would not exacerbate existing highway and access matters, including safety concerns, taking account of the mitigation works proposed and in considering that Highways and Transportation no longer raise objection. However, it is clear to me that the proposed mitigation works must be completed and operational prior to first use/occupation of the temporary buildings to ensure that unacceptable impacts on the safety of pedestrians and the operation of the local highway network would not occur. Without the mitigation measures proposed, the development, in my view, would be unacceptable on highway safety and access grounds. Dartford Borough Council are

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also of this opinion, and request that these matters be secured by appropriate conditions.

67. Therefore, should permission be granted, I consider it appropriate that conditions of consent be imposed requiring all of the mitigation measures proposed by the applicant (as listed above) to be complete and operational prior to first use/occupation of the temporary classrooms. In addition, I consider that further conditions of consent should require the onsite footpath link to be open and available to all local pupils between the hours of 0730 and 0930 and 1430 and 1630 Monday to Friday during term time, and requiring the onsite drop-off/pick-up area to be available for use and supervised by a member of staff during the afternoon peak, in addition to the morning peak. Lastly, a further condition would require the Academy to implement and monitor the initiatives set out within the submitted Travel Plan. In this instance I see no reason to require the submission of an updated Travel Plan as the submitted version is only recently completed and the development permitted, should Members agree with the recommendation, would be for a period of less than 12 months. Subject to the conditions outlined above, and a temporary approval until 1 September 2017, I am satisfied that, in this instance, that the proposal (with the highway mitigation measures) would not have a significantly detrimental impact on the local highway network and therefore see no overriding reason to refuse the application on this ground.
68. I recognise that such a restriction on occupation may cause operational issues for the Academy as the 2016 intake will be starting in September 2016 regardless of whether or not appropriate accommodation is provided. I understand that the Academy have undertaken internal alterations to accommodate the pupils on a temporary basis, which although is not ideal, is the only option available to them in advance of a decision on this planning application. Such internal alterations do not require planning permission and are therefore not under the control of the County Planning Authority. Although the additional pupils will be onsite in September (a decision made by the Education Authority), I consider that as a Planning Authority we must be satisfied that highway safety would not be compromised by development and that development requiring planning permission is in accordance with planning policy and guidance. The provision of the temporary accommodation requires planning approval and therefore it is necessary to assess the highway impacts (amongst other matters) of the additional pupils that the development would accommodate. I am firmly of the view that without the mitigation proposed, the development would be unacceptable on highway safety grounds. Therefore, my recommendation is that all of the mitigation measures must be complete prior to first use/occupation of the temporary buildings.

Playing Field

69. In addition to the Green Belt implications of the proposed siting of the temporary classrooms, as discussed earlier in this report, the impact of the proposed development on playing field provision also needs to be addressed. Dartford Borough Council consider that the proposed temporary classrooms would encroach upon an existing cricket pitch, and further state that the County Council need to ensure that the proposal would not result in the loss of any sports pitches at the Academy. Sport England were consulted on this application, and following the submission of additional information from the applicant with regard to the provision of sports facilities on site, particularly the provision of cricket wicket/pitch facilities, raise no objection to the application subject to a condition requiring the removal of the temporary buildings by 1 September 2017. Although a temporary loss of a usable

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part of the playing field would occur as a result of the siting of the temporary buildings, Sport England are satisfied that the temporary loss would not have a significant impact on the site's ability to accommodate sufficient cricket facilities for the current school roll. I am therefore satisfied that the development would not have a detrimental impact on the provision of adequate sports facilities at the site, subject to any permission being for a temporary period until the 1 September 2017 only.

Ecological Matters

70. An Ecological Assessment was submitted in support of this application, which has been assessed by the County Council's Biodiversity Officer. No objection is raised to the application, and no further information is required for submission. However, should permission be granted, conditions of consent are required to ensure that the precautionary measures outlined in the Ecological Assessment are implemented during the 'construction' of the footpath link onsite, that works are undertaken outside of the bird breeding season (March to August) unless supervised by an experienced ecologist, and that the provision of additional ecological enhancements (such as bird and bat boxes) be given further consideration. Subject to the imposition of those conditions, I am satisfied that the development would not have an unacceptable impact on biodiversity interests.

General Amenity and Other Matters

71. Other than off-site traffic, highway safety and access matters, the only concerns raised regarding general amenity matters relate to a potential increase in air pollution, and the exacerbation of existing problems regarding anti-social behaviour and the dropping of litter. With regard to design and residential amenity, I am satisfied that the temporary classroom buildings proposed would be sufficiently distant and screened from local properties to avoid any direct adverse impact. With regard to air pollution, I am of the opinion that the small increase in the school roll for the 2016-2017 year only (being considered as part of this application) would have a negligible impact on local air quality and see no reason to refuse the application on this ground. With regard to litter and anti-social behaviour, although regrettable, these matters are outside of the remit of the Planning Authority.
72. The local community also consider that the applications for the expansion of various schools in Wilmington should be considered as a whole, and not dealt with in a piecemeal fashion. However, the County Planning Authority can only process applications for school developments where the County Council is applicant. In this instance therefore, developments at Wilmington Grammar School for Boys and the local Nursery are considered by the Borough Council as the County Council is not promoting the development. Further, the two sites that we are dealing with at County level, Wilmington Academy and Wilmington Grammar School for Girls, are two separate schools and we cannot process one application that spans two sites. The applicant further advises that the need to submit proposals for temporary accommodation in addition to permanent solutions was due to time pressures to provide the temporary accommodation on site for September 2016. The highway implications of these proposals are, however, considered as a whole, and the cumulative impact is considered in the determination of this application, and will be further considered in the determination of the permanent proposals. Staff may have been recruited by the Academy, and a Planning Authority cannot prevent that, but that is not something that affects the planning process or in any way suggests a pre-judgement by the Planning

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Authority. Lastly, as set out in paragraph 30 of this report, the application (including amendments) has been well publicised and our publicity requirements were not only met but also exceeded in this instance.

Construction Matters

73. Wilmington Parish Council and the local community have expressed concern regarding the construction traffic associated with the development, and request that access by construction vehicles be restricted to avoid peak school times. Given that there are nearby residential properties, adjacent/nearby schools, and a local nursery, I consider it appropriate that details of a full Construction Management Strategy be submitted for approval prior to the commencement of development. That should include details of the methods and hours of working, location of any required site compounds and operative/visitors parking, details of any required lorry waiting facilities, details of the construction access, and details of how the site access would be managed to avoid conflict with peak school times and traffic associated with local schools. Therefore, should permission be granted, a Construction Management Strategy would be required pursuant to condition and the development would thereafter need to be undertaken in accordance with the approved strategy.

Conclusion

74. This proposal has given rise to a variety of issues, including the need to demonstrate very special circumstances to justify inappropriate development in the Green Belt, the impact of the proposed development on the openness of the Green Belt, and the impact of the development on the highway network. I consider that very special circumstances have been demonstrated in this particular case for overriding Green Belt policy considerations. I also consider that the development has been designed to minimise the impact of the development on this part of the Green Belt, and its functioning. In addition, subject to the imposition of the conditions outlined throughout this report, I consider that the proposed development would not have a significantly detrimental impact on the local highway network, or the amenity of local residents, and would accord with the principles of sustainable development as set out in the NPPF. In addition, support for the provision of school places is heavily embedded within the NPPF and local planning policy, and this development would satisfy a required need for secondary school places in the Dartford area. Therefore, subject to the imposition of conditions, I am of the opinion that the proposed development would not give rise to any material harm and is otherwise in accordance with the general aims and objectives of the relevant Development Plan Policies and the guidance contained in the NPPF. Therefore, I recommend that the temporary permission (until 1 September 2017) be granted subject to appropriate conditions

Recommendation

75. I RECOMMEND that PLANNING PERMISSION BE GRANTED SUBJECT TO conditions, including conditions covering:
- the development to be carried out in accordance with the permitted details;
 - the modular buildings to be removed from site and the land reinstated as playing field on or before the 1 September 2017;
 - the submission and approval of the colour finish of the modular buildings;

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- all highway mitigation (footway widening on Common Lane, provision of on-site footpath link, surfacing of PROW DR118A, and provision of two on-site bus parking bays) to be completed and operational prior to first use/occupation of the modular buildings;
- onsite footpath link to be open and available to all local pupils between the hours of 0730 and 0930 and 1430 and 1630 Monday to Friday during term time;
- the onsite drop-off/pick-up area to be available for use during the morning and afternoon peak Monday to Friday during term time and supervised by a member of staff;
- the Academy to implement and monitor all of the Travel Plan initiatives and review where necessary;
- the development to be undertaken in accordance with the recommendations and precautionary measures set out within the Ecological Assessment;
- the development to be undertaken outside of the bird breeding season (March to August) unless supervised by an experienced ecologist;
- provision of ecological enhancements;
- the submission and approval of a Construction Management Strategy, including details of the methods and hours of working, location of any required site compounds and operative/visitors parking, details of any required lorry waiting facilities, details of the construction access, and details of how the site access would be managed to avoid conflict with peak school times and traffic associated with local schools;

76. I FURTHER RECOMMEND THAT the applicant BE ADVISED of the following informatives:

- The applicant's attention is drawn to the letter from Public Rights of Way which contains general informatives with regard to works adjacent to and/or on a Public Right of Way. It is also advised that 'the granting of planning permission confers on the developer no other permission or consent or right to close or divert any Public Right of Way at any time without the express permission of the Highways Authority;
- The applicant's attention is drawn to the letter from Highways and Transportation in which it is noted that it is the responsibility of the applicant to ensure that all necessary highway approvals and consents where required are obtained and that the limits of highway boundary are clearly established in order to avoid any enforcement action being taken by the Highway Authority. The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under such legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement;

Case officer – Mary Green	03000 413379
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Background documents - See section heading
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Example representation from Wilmington Safer Streets

Appendix 1

Wilmington Safer Streets - Resident Consultation

Before we began this document we wanted to identify the main aims of Dartford Borough Council. Please see the below text taken from Dartford Borough Council's latest Core Strategy. **We felt the last paragraph was significant to our concerns.**

"This Core Strategy is a significant document for everyone who lives and works in the Borough. Whilst no one could ever claim that it makes light reading what it contains and what it may mean for the future of our community is hugely important. It sets out the approach that a number of partners - particularly those involved in community planning and development control - will take to the challenges ahead. It looks at this community's future needs in areas like housing, transport, leisure, growth and jobs. It seeks to provide a 'routemap' to ensure that the future Dartford we get is the future Dartford we want.

The strategy is not a fixed blueprint. Over time it will flex, change and adapt to different circumstances but the core principles will be the ones that drive our decision-making and policies for the years ahead.

Please don't think that this strategy is all about development and building things. It's not.

Some of its most important proposals relate to things we won't permit - like overdevelopment, excessive burdens on our transport network, poor design and badly thought-out architecture. It rightly places huge importance on public spaces, the dignity of housing that we demand and the need to provide social infrastructure - things like village halls, playgrounds, parks, open spaces and even cemeteries. It also encapsulates my own personal view that a place like Dartford - a rich mix of rural villages and urban centres - should only grow and change at a rate that's supported by local people.

Dartford is your town and its growth, future and character are in your hands."

Jeremy Kite
Leader of Dartford Council

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**Areas of concern that need addressing in the
Transport Consultation**

**Proposed Expansion of
The Academy and Wilmington Grammar School for Girls**

CONGESTION

Main Causes of Congestion :

- Common Lane is not wide enough in places for buses, coaches and other large vehicles to pass each other, resulting in vehicles dangerously mounting the pavement whilst children and families are walking along it. **See photos L, M and N.**
- Common Lane is not wide enough to allow filter traffic to turn right in to the school entrance at the bottom of the Village Common.
- Insufficient waiting and parking zones on site at schools for parents who wish to collect or drop off their children which results in parents parking where ever possible, no matter if it blocks access routes and causes congestion to other road users. **See photo P.**
- Schools currently restrict parents from entering the Academy to collect their children. At 3pm each day two school wardens are placed at the main entrance to the Academy and their job is to stop parents from parking on site, which leads parents to parking anywhere possible, no matter if it blocks access routes and causes congestion to other road users. **See photo P.**
- Buses and coaches are restricted on their route when trying to turn from Common Lane in to Parsons Lane due to the amount of cars parked across the entrance of Parsons Lane.
- Buses currently collect school children from 'unofficial bus stops' created by the school children. One example of this is a bus that currently collects groups of girls who congregate at the corner of Parsons Lane and Common Lane. This again leads to immense congestion and is incredibly unsafe for the children. Please note to widen these pavements, as suggested, would simply encourage the children to use this area as an unofficial bus stop even more. **The area of the unofficial bus stop is shown in photos A and B.**

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- Other roads in the area around the schools are also affected greatly by the traffic and congestion issues. We asked our members to share details of problems in other local roads and got a lot of information back about some key "hot spots":
 - **Edwin Road** (marked with a blue star on the map) is extremely hard to navigate exit safely during school run times due to parents parking on both sides of the road on the section nearest to Common Lane, this means not even a large car is able to pass through, let alone an emergency vehicle. In addition, as you exit Edwin Road onto Common Lane, there's rarely a weekday afternoon when people aren't parked on the yellow lines on Common Lane, near the corners of Edwin Road. You cannot see anything coming up or down Common Lane until you have pulled out into the path of any oncoming traffic, making it almost impossible to exit Edwin road safely.
 - **Tredegar Road** (marked with a red star on the map) is also affected. Parts of Tredegar Road are very narrow and traffic has increased along here since the last expansion of the Academy so we envisage this will continue to become more of a problem. The road is used as a cut through and speed, especially along the narrow sections is a real problem. Cars and vans regularly mount the pavement to pass cars coming the other way. Tredegar Road is also used as a cut through for students walking to the bus stop at home time, due to the narrow pavements they spill onto the road and into the paths of parents rushing to pick up their own children, resulting in hooting and swearing.
 - **Wilmington Court Road** (marked with an orange star on the map) is used as a cut through and speed along here is a concern among residents.
 - **Broad Lane** (marked with a green star on the map) is also affected, parents and students park there, adding to congestion and often parents arriving for pick-up and drop-off times park across driveways. Students parking here all day prevent home owners parking outside their own homes, a problem which will only get worse with increased students in the area.

COMMUNICATION

- Schools need to increase the flow of information and communication between themselves with regards to the congestion and parking issues created by the parents, coaches, buses and 6th former parking.
- Schools need to communicate more with local residents on local issues created as a direct result of the schools.
- Schools need to give advance warning to local residents when traffic is expected to be increased out of normal school hours. E.g. local residents are not given prior warning when the schools have open evenings, which grinds the whole village to a halt due to the parking of the prospective parents for all three schools along Common Lane and surrounding areas between and 6 and 8pm.

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SAFETY

Currently Common Lane is very unsafe for its users and Kent County Council need to address the following issues:

- Coaches and buses mounting pavements to pass each other, which is dangerous to the school children and other pedestrians. There have been several instances of buses hitting children in accidents that have miraculously not resulted in serious injuries. One Academy pupil was recently hit by a bus as she walked along the pavement on Common Lane. See photos L, M and N.
- Speeding trucks that use Common Lane as a cut through to the various construction industry businesses in the area, including the aggregate and concrete supplier on High Road Wilmington, and some of the businesses located in the industrial park off Powder Mill Lane to the East of the village. These vehicles are enormous and are thundering past very young children, just inches away, at speeds inappropriate for the road.
- Lack of safe and secure crossings for the school children and pedestrians.
- Lack of signage about safe parking, and lack of school crossing signs (the ones that exist are largely obscured by foliage, see photo J).
- Lack of safe places to stop and wait whilst collecting children from school.

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ENVIRONMENT / PUBLIC HEALTH

Observations and Existing Concerns:

- Concerns over the length of the expansion projects and lack of parking on site for contractors, which will overflow on the already strained parking we have in the village.
- Concerns over an increase in nuisance behaviour by students to and from the schools, with the increase in numbers.
- A high percentage of children attending these schools are not local and therefore will be driven to and from school which means a further increase in car pollution/carbon emissions in our local area.
- Smoking and associated litter by school children (see photo V). Litter is currently a big issue, even without the expansion, and needs to be addressed. The woodland from Tredegar Road is used as a walkway to and from the bus stops and schools by pupils and an easy place to drop their litter en route, particularly as there is only one (very unstable) bin in this area (see photos D and F). The level of local litter has reached the point where the Parish Council have organised a volunteer clean up session in March.
- Rude and aggressive behaviour of parents collecting their children when challenged for their unsafe parking by pedestrians or residents, with little support given by the schools.
- Losing the 'village feel' by allowing this expansion, any changes to improve safety need to be made sympathetically in order to keep the village feel of Wilmington and prevent it turning into a "campus" for local schools.
- The last expansion of the schools was completed in July 2014, can we have an assurance there will be no more expansion in future?
- Lack of support and acknowledgement by Dartford Borough Council and Kent County Council regarding local resident parking issues in the past and present, let alone with the proposed new expansion. Currently any parking restrictions are not enforced at all, the parking wardens have only attended once since September 2015 despite numerous complaints from residents. Parking restrictions simply do not work without enforcement.
- Poor parking across pavements which leave pedestrians with young children and buggies no option but to walk into the road – see photos Q and R. Poor parking has led to the deterioration of the grass on our village Common, as pedestrians are forced to walk on the edge of the Common in order to pass the cars blocking the pavements – see photos S, T and U and V.
- Gangs of children waiting on the edge of the village Common, again ruining the grass.

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- Schools need to accept responsibility and act towards a solution when residents make them aware of issues. Complaint emails have been ignored in some cases. Extract taken from "Home to school travel and transport guidance- Department for Education - Statutory guidance for local authorities":

"July 2014 - Poor behaviour on school buses/other modes of transport

47. The department expects each school to promote appropriate standards of behavior by pupils on their journey to and from school through rewarding positive behaviour and using sanctions to address poor behavior. The EIA 2006 empowers head-teachers to take action to address unacceptable behaviour even when this takes place outside the school premises and when pupils are not under the legal control of the school, but when it is reasonable to do so. In the department's view, this would include behavior on school buses, or otherwise on the route to and from school, whether or not the pupils are in school uniform."

SPECIFIC PARKING ISSUES THAT NEED ADDRESSING AND HAVE BEEN RAISED ALREADY WITH KENT COUNTY COUNCIL

- Persistent stopping and parking on the triangle piece of pavement outside Wilmington Day Nursery. See photo O.
- Persistent parking across the public footpath entrance that leads to Tredegar Road. See photo D.
- Parking at the entrance of Parsons Lane, increasing congestion and making the area unsafe. See photos B and C, which show the areas where parking is a problem.
- Persistent unsafe parking and stopping over local residents private access roads - which violates Highway Code 243:
 - DO NOT stop or park:*
 - I.anywhere you would prevent access for Emergency Services*
 - II.in front of an entrance to a property*

RESPONSIBILITY

- Schools need to acknowledge responsibility of their pupils and the associated issues that we incur as residents by their presence. Litter, parking, congestion etc. Schools frequently ignore emails from residents and do not address the issues we have raised previously.
- Schools need to educate their 6th form students on safe parking, these students have often only just passed their test and frequently park in unsafe places which directly affects pedestrian access in the village. This needs to be addressed and advice given to

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

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the students on where to park when attending their school. This needs to be done each year.

- Schools need to educate the parents of the pupils on where is safe and appropriate to park, collect or wait for their children.
- Schools need to increase available parking on site for parents at collection and drop off times. Currently two stewards from the Academy do not allow parents on site for the afternoon collection. This is unfair on local residents and needs to be addressed as it increases the chance that those vehicles will sit and wait in unsafe and nuisance places.

POLICE

- After complaints from local residents regarding the numerous issues we face, the local police suggested a police presence for 1 hour each week on the village Common to assist with issues. Currently a police van with two PSCOs park around the village Common from 10am-11am every Tuesday, perhaps one of the quietest times of the week. When questioned why they were not able to attend at the time of the reported issues (between 8 and 9am or 3 and 4pm) we were told that resources wouldn't allow that.
- This leads us to think that the police are not properly engaging with the schools or the local residents on these issues as the police are even present on the Common during schools holidays, which seems a waste of local resources when clearly there are no issues at these times as the schools are closed.

WILMINGTON SAFER STREETS' SUGGESTED SOLUTIONS TO THE ABOVE ISSUES

- We would ask that instead of filling the village with fixed bollards, which we feel will ruin the look and feel of our pretty village, Kent County Council should place raised flower beds outside of Wilmington Day Nursery where the parents constantly park on the triangle piece of pavement alongside the zig-zig lines on the main road. **See photo O.**
- An additional pelican crossing to be added by the Primary School, this would provide safe crossing and also alleviate the congestion at the other crossing further along Common Lane. This would also mean that traffic further up the hill would not be held up as frequently as it currently is. **See point 13 on the map.**
- Where parking is currently permitted on the Common - place marked parking bays for safe kerb parking - 50% on the curb and 50% on the road. This will ensure enough room is left for pedestrians to walk safely along the pavement. It will also encourage safer parking. **See photos X and Y for an example of this in another borough.**

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- Place double yellow lines on any part of the pavement where dedicated kerb parking bays will not work, there is one particular piece of pavement used as a parking space and pedestrians are left with no alternative but to walk in the road - see photos Q and R.
- Ensure consistent and effective enforcement of parking restrictions. At present yellow line restrictions are not enforced at all and any future additional restrictions will need proper policing/enforcement. Dartford Borough Council needs to take responsibility for this.
- Upgrade and move the barrier which is placed at the start of the public footpath leading to Tredegar Road. See photos D and F. The barrier currently sits back from the road and this allows cars to park and sit and wait in front of it, we would suggest moving this barrier nearer to the road. By reducing the amount of space at the mouth of the footpath, you will stop cars being able to park in this very dangerous and congested spot.
- Re-route the coaches and buses to make their journey as efficient as possible and reduce congestion.
- Reduce the speed of traffic by adding speed calming solutions as the current speed bumps are not working and are poorly maintained. See photos E and F. We think a 20mph speed restriction is needed along Common Lane.
- Place double yellow lines all the way up Common Lane from the private road to Parsons Lane, as this currently has no restrictions and unless policed, parents will start to park here going forward and have done so in the past when attending open evenings.
- Place white deterrent lines across the private access road entrance on Common Lane to signify the access route to properties. See photo W for an example.
- Create a drop-off and pick-up site for parents away from the village on Oakfield lane, where there is no residential housing and the road is wider.
- Create a coach park/drop-off on Dartford Heath or on site at the Girls Grammar School.
- Current bus stops need reviewing and the 'unofficial bus stops' should not be permitted. Children should be walking to safe official bus stops away from Common Lane, not congregating in large groups on narrow pavements.
- Increase the amount of litter bins on the Common and in the woodland.
- Carry out a structural check on the old wall that runs up the hill on common Lane on the border of WGSG land. See photos G and H.

Having attended the evening consultation at the Academy in February we were impressed with some of the solutions proposed, although any changes absolutely have to be made in keeping with the village feel of Wilmington. Any additional pathways or walkways would have to be designed appropriately to avoid any future issues – such as creating places where anti-social behaviour and littering would be likely. Any street “furniture” would need to be in keeping with the village and where possible historical features, such as the old walls along Common Lane, should be retained.

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

Map and photos of key locations on Common Lane, Wilmington



Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

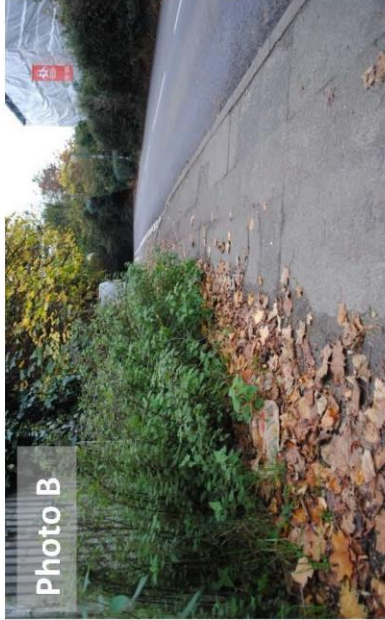


Photo B

Point 5 on map
On this narrow section of pavement just off Parson's Lane an "unofficial" bus stop operates for pupils for the Girls' Grammar school. Photo B shows the view towards the corner of Parsons Lane where parents park and block buses causing traffic to come to a standstill.

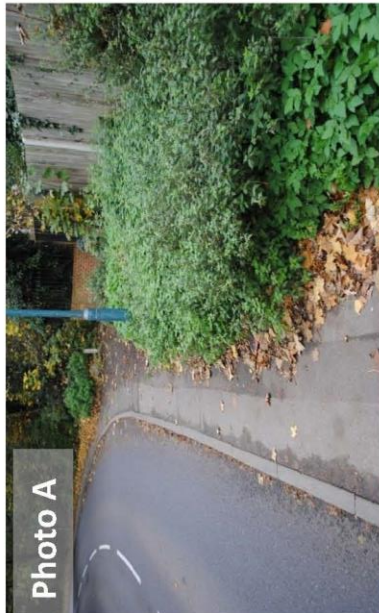


Photo A



Photo D

Point 7 on map
Just after the blind corner is the access to the alleyway leading through the woods to Tredegar Road. That bin is frequently tipped over by kids/wind/or people moving it to park across the alleyway entrance. Consequently litter is strewn across the road and woods. Parents frequently use this to park, churning up the mud and making it slippery and dangerous as well as blocking the entrance to the footpath.



Photo C

Point 6-7 on map
Looking from Parson's Lane towards the blind corner. From this point onwards until the Common the road is not wide enough for 2 buses, or other large vehicles, to pass.

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)



Photo F



Photo E

Point 7 on map

The speed bumps are poorly maintained and ineffective to large vehicles, particularly the large plant vehicles travelling through the village.

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)



Photo G

Point 7-8 on map

The pavement is only on one side and is extremely narrow. Buses mount the pavements here, but even when they don't they are travelling at 30mph or more within inches of small children, families and secondary pupils. Heavy construction vehicles also travel along this section at speed.



Photo H

Point 8 on map

You can see here how narrow the pavement is and how narrow the road is.



Photo J

Point 9 on map

Signage is almost entirely obscured by overgrown foliage. The double yellow lines stop here and parents do, inexplicably, park on this section of road causing massive congestion in the area. In Photo H you can see how close buses come to pedestrians, in this instance the bus had pulled slightly over the centre of the road to avoid hitting the pedestrians.



Photo K

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)



Photo M

Point 8 on the map
 These photos are just 4 of many taken by parents and residents. This is a daily occurrence during term times. In every one of these photos you can see children walking along pavements as buses brush past them.



Photo L



Photo N

Item D2

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

Appendix 1



Point 12 on the map
Parents park on both sides of the road on yellow lines causing chaos.



Point 10 on the map
Parents park on the pavement to avoid the zig-zags, this obscures the view for children crossing and is illegal and dangerous.

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

Point 10 on the map
.Sixth formers and parents frequently park on this section of pavement leaving no space at all for pedestrians and forcing them to walk into the road.



Photo R

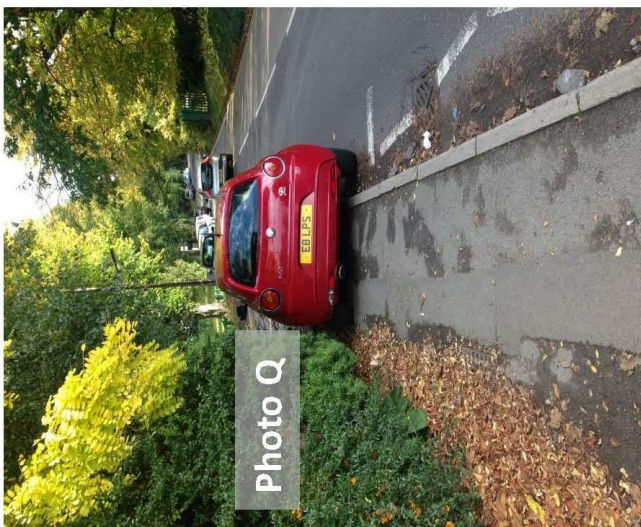
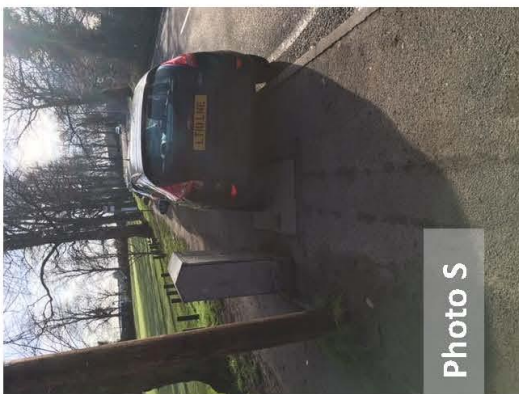
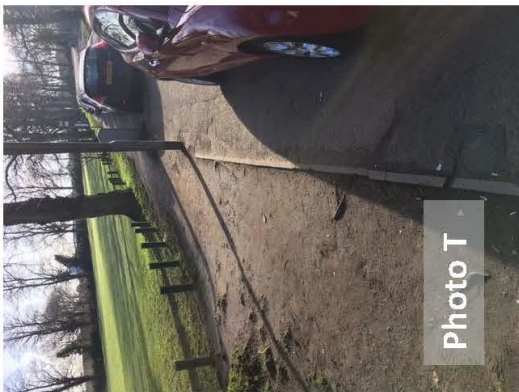
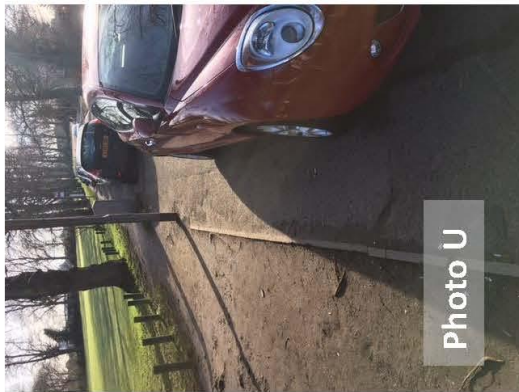
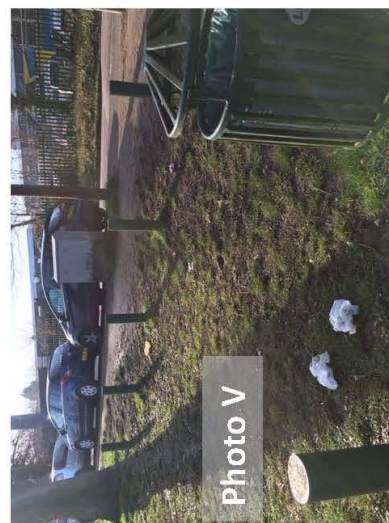


Photo Q

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)



Point 11 on the map
These photos show the deterioration of the Common due to pedestrians having to walk along the edge as the pavement is blocked by cars.



Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)



Photo Y



Photo X

An example of allocated kerb parking bays.

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Item D3**Expansion of school from 2FE to 3FE at Hextable Primary School, Rowhill Road – SE/16/1480 (KCC/SE/0074/2016)**

A report by Head of Planning Applications Group to Planning Applications Committee on 14 September 2016.

Application by Kent County Council for a new three classroom extension with SEN room to the Infants School with associated landscaping, demolition of an existing mobile classroom and construction of one new library and group space, plus three new single storey classroom extensions to the Junior School, new cycle store and MUGA, and pupil pick up/drop off facility with parking spaces – Hextable Primary School, Rowhill Road, Hextable, Sevenoaks, Kent, BR8 7RL. (Ref: KCC/SE/0074/2016 and SE/16/1480)

Recommendation: Planning permission to be granted, subject to conditions.

Local Member: The late Mr R Brookbank

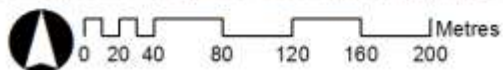
Classification: Unrestricted

Site

1. Hextable Primary School is located within the village of Hextable, which is located to the north of Swanley. The school site is adjacent to residential development to the south and west boundaries and Broomhill Bank School (north) (the former Furness School site) to the east. To the north is woodland within the Metropolitan Green Belt and some residential properties. The school site is not included within the Green Belt however the green playing field land within both school sites are identified by Sevenoaks District Council as Open Space. The school can be accessed from both the east via Rowhill Road and the west via St David's Road. To the north is Puddledock Lane. Please refer to the site location plan.
2. The school comprises of two buildings and is separated into the infant school and junior school with the playing field in the middle of these two buildings. The infant building is located to the west of the school site and is accessed off St David's Road for both vehicles and pedestrians. It currently comprises a single storey flat roofed building around a quadrangle, which houses a nursery, reception class and KS1 infant children. There is a total of 6 classrooms, a hall, staff room, 2 ICT suites and offices. There is also a cookery room and a plant room. There is a parking area by the infant building for staff only but it is not formally marked out as over the years the road markings have faded, but it is considered that this area can accommodate around 24 vehicles plus 2 disabled parking spaces.
3. The junior school is accessed off Rowhill Road and comprises a mixture of 1 and 2 storey buildings housing the KS2 junior children. It currently comprises 10 classrooms in total. On the ground floor there are 7 classrooms (one of these classrooms is currently used as a resource room), a hall, ICT suite, kitchen, various stores and cloakrooms and an office area which includes the head teacher's office and a staff room. On the first floor of the junior building there are 3 further classrooms with one of the classrooms currently being used as a library. There is also a mobile building (a container) which is used for storage. There is a parking area by the junior building for approximately 17 spaces and this is for staff use only plus 1 disabled parking space. Presently there are around 44 parking spaces within the 2 parking areas for staff use only.

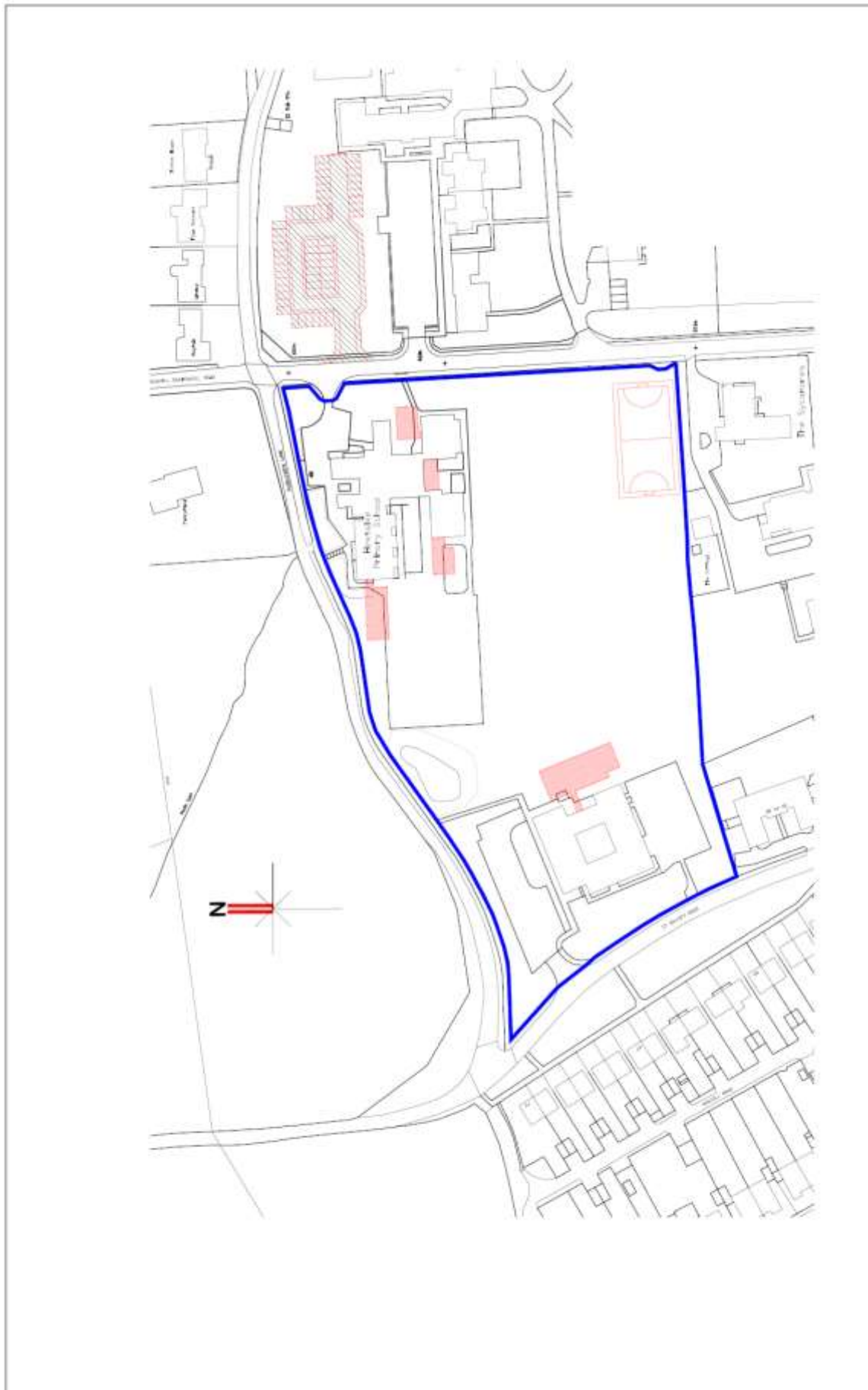
Expansion of school, Hextable Primary School – SE/16/1480

Site Location Plan



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Expansion of school, Hextable Primary School – SE/16/1480

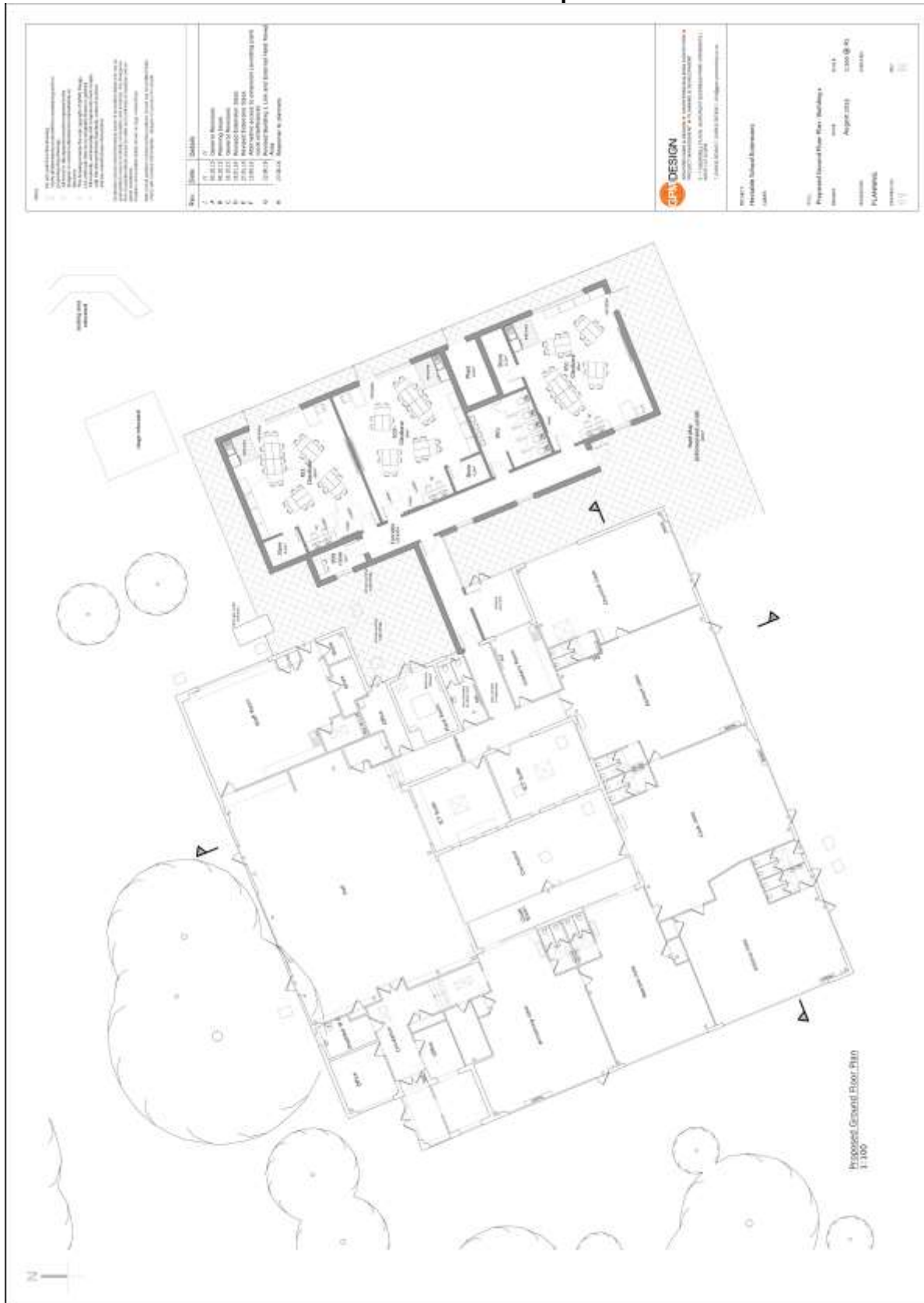


Expansion of school, Hextable Primary School – SE/16/1480



Expansion of school, Hextable Primary School – SE/16/1480

Infant School - Floor plan



Expansion of school, Hextable Primary School – SE/16/1480

Infant School - Elevations

The drawing shows four architectural elevations of a proposed building, oriented vertically on the page. From top to bottom, they are:

- Proposed South Facing Elevation** (Scale 1:100): Shows a long, low profile with a central gabled section and a series of windows.
- Proposed East Facing Elevation** (Scale 1:100): Shows a side profile with a prominent chimney and a series of windows.
- Proposed North Facing Elevation** (Scale 1:100): Shows a side profile with a prominent chimney and a series of windows.
- Proposed West Facing Elevation** (Scale 1:100): Shows a narrow profile with a few windows.

External Materials:
 External Walls: Brickwork
 Roofs: Asphalt
 Windows: UPVC
 Doors: UPVC
 Ground Floor: Single Ply Roof Finish
 First Floor: UPVC Windows + Doors

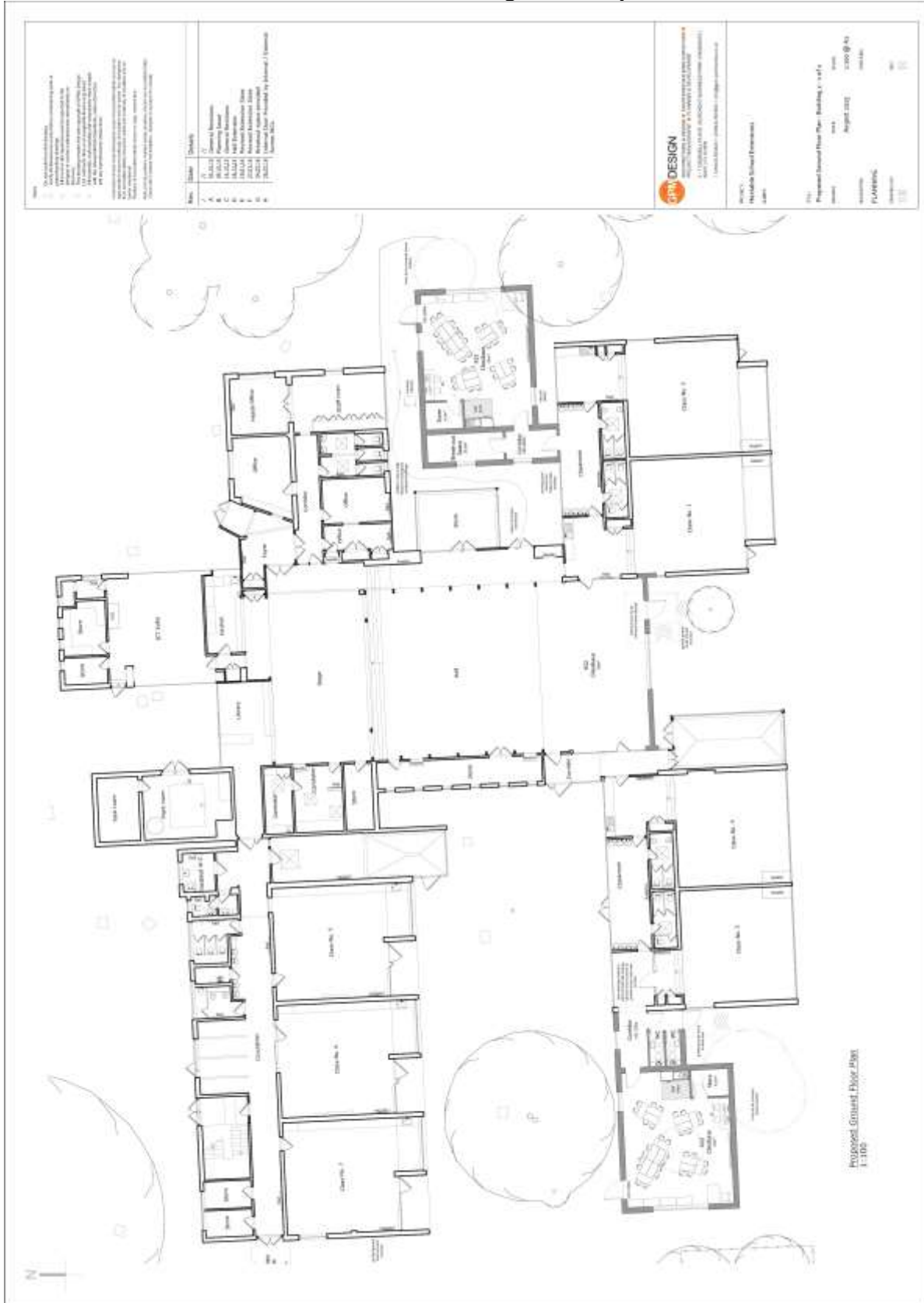
No.	Name	Details
1	External Wall	Brickwork
2	Roof	Asphalt
3	Window	UPVC
4	Door	UPVC
5	Ground Floor	Single Ply Roof Finish
6	First Floor	UPVC Windows + Doors

OTHER DESIGN
 2022 UNIVERSITY OF LONDON COLLEGE LONDON
 21, BEDFORD SQUARE, LONDON, W1P 3AP
 TEL: +44 (0)20 7546 3416 FAX: +44 (0)20 7546 3417
 WWW.COLLEGE.LONDON

Project/Revision Building
 Name: Hextable School Expansion
 Date: August 2022
 Scale: 1:100 @ A3
 Author: JAMES
 Checker: J.C.

Expansion of school, Hextable Primary School – SE/16/1480

Junior School Building 1– Floor plan



Expansion of school, Hextable Primary School – SE/16/1480

Junior School Building 1 – Elevations

External Materials
 Brickwork Finish
 Slate Roofing
 UPVC Windows + Doors
 Single Ply Roof Finish

Proposed East Facing Elevation
 1:100

Proposed West Facing Elevation
 1:100

Notes:
 1. All elevations are shown in black lines on a white background.
 2. All elevations are shown in black lines on a white background.
 3. All elevations are shown in black lines on a white background.
 4. All elevations are shown in black lines on a white background.
 5. All elevations are shown in black lines on a white background.

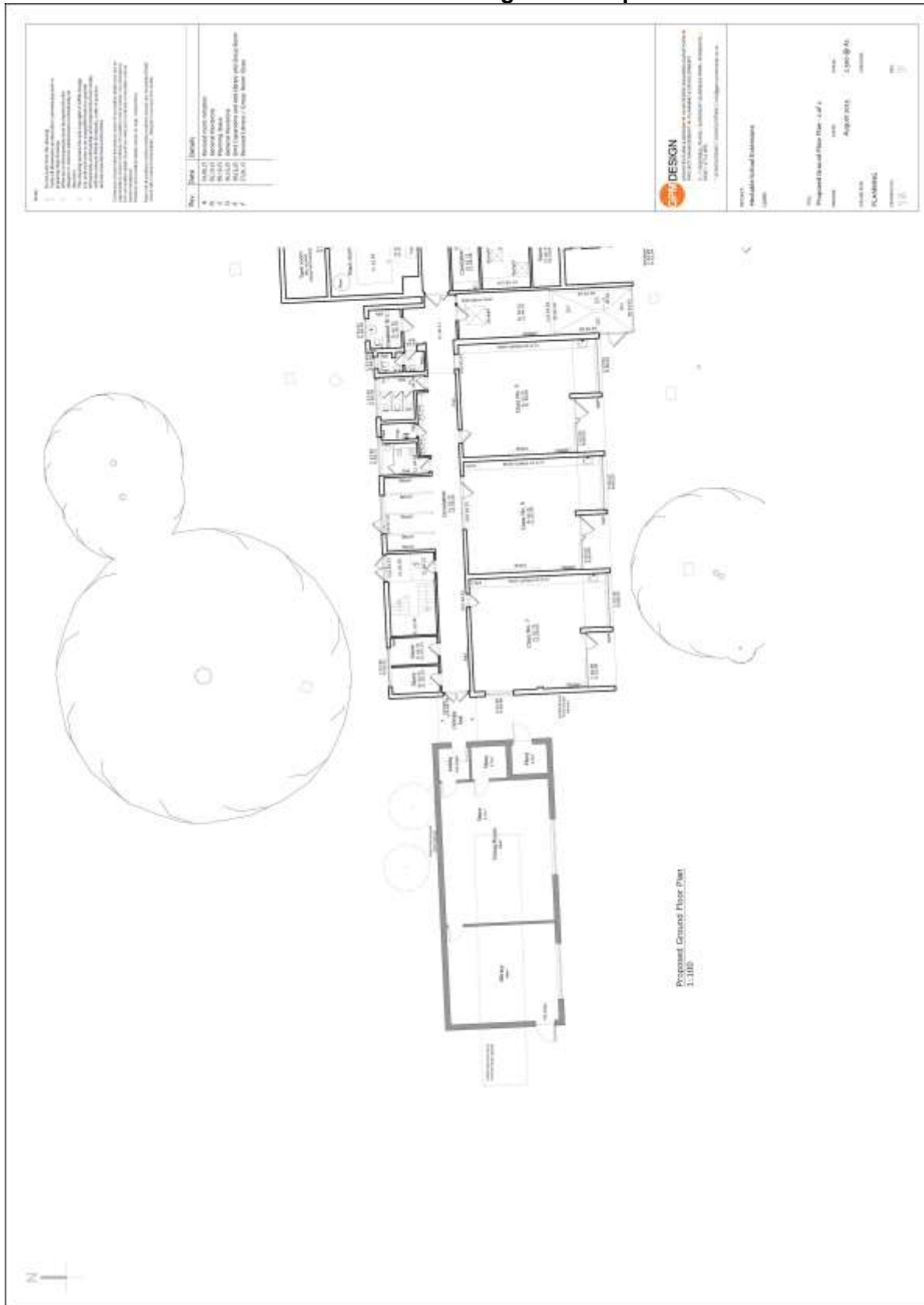
No.	Date	Details
1	15/11/16	Initial Design
2	15/11/16	Revised Design
3	15/11/16	Final Design
4	15/11/16	Construction Details
5	15/11/16	Material Schedule

DESIGN
 PROJECT: EXPANSION OF A PRIMARY SCHOOL
 1. 15/11/16, 15/11/16, 15/11/16, 15/11/16, 15/11/16
 2. 15/11/16, 15/11/16, 15/11/16, 15/11/16, 15/11/16

Project: Expansion of Hextable Primary School - 1 of 1
 Date: 15/11/16
 Author: [Name]
 Designer: [Name]
 Project No: [Number]
 Scale: 1:100

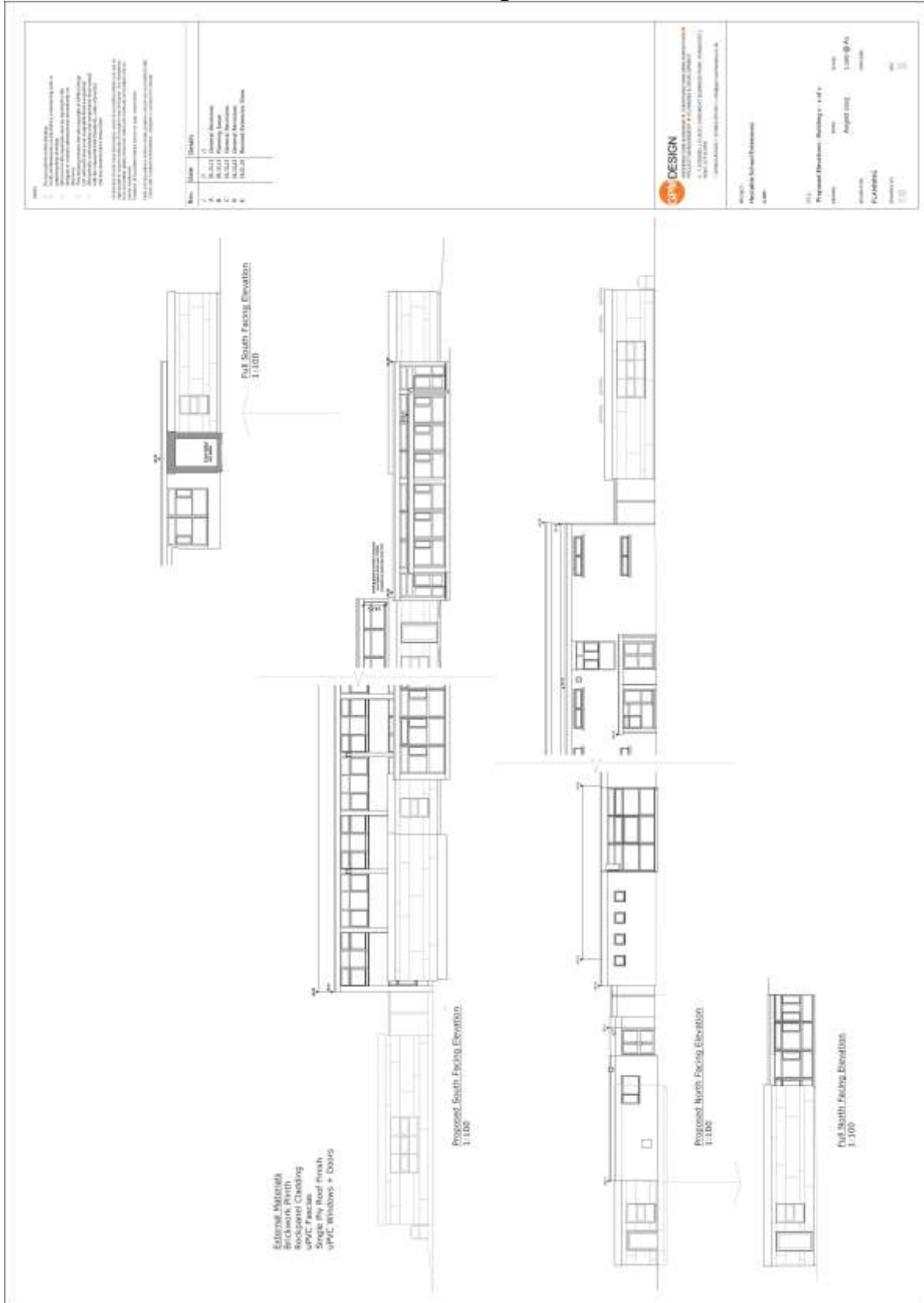
Expansion of school, Hextable Primary School – SE/16/1480

Junior School Building 2 – Floor plan



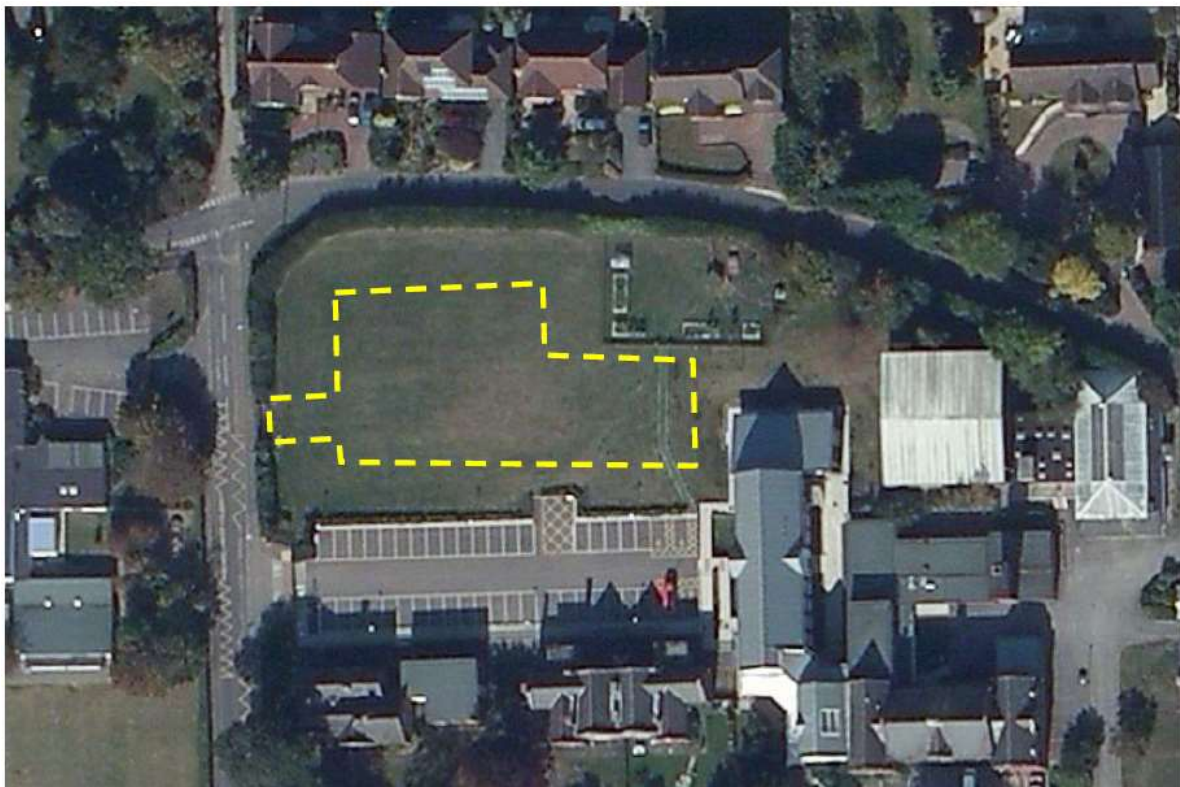
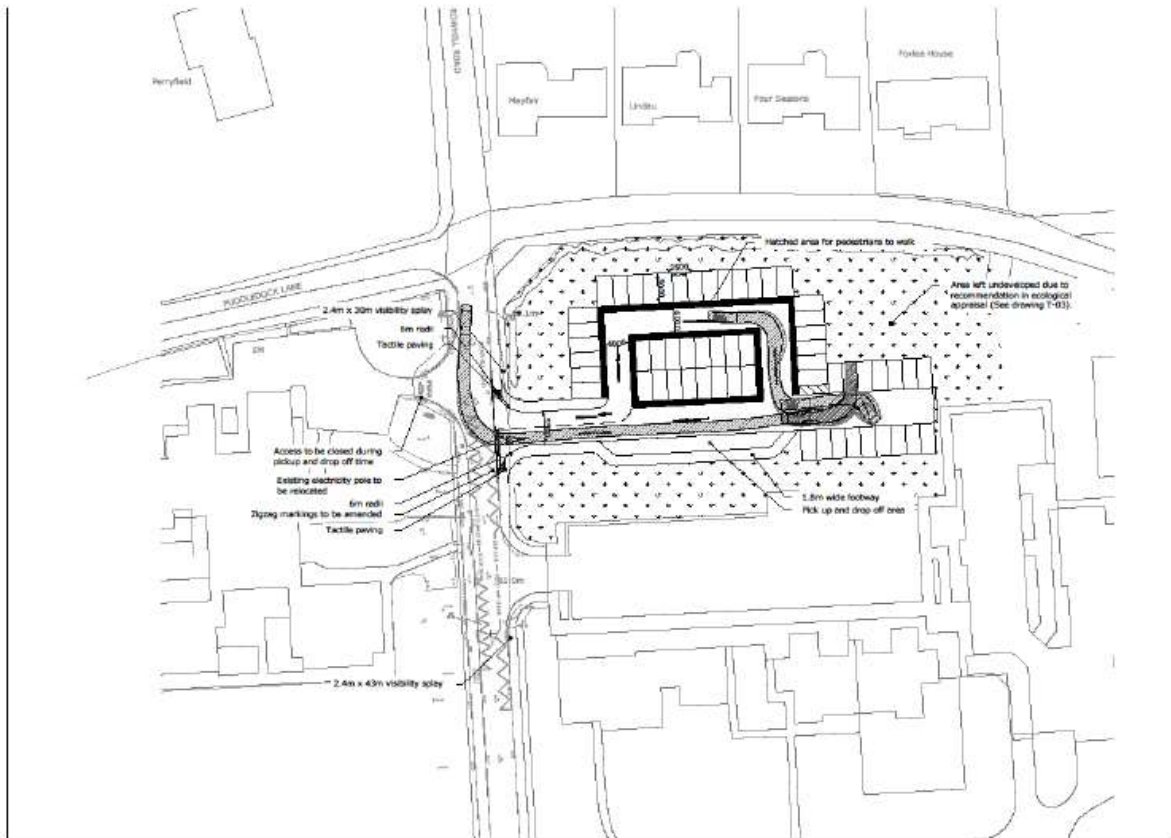
Expansion of school, Hextable Primary School – SE/16/1480

Junior School Building 2 – Elevations



Expansion of school, Hextable Primary School – SE/16/1480

Pupil pick up/drop facility plus 57 park and stride car park



Expansion of school, Hextable Primary School – SE/16/1480

4. The school buildings are located to the north east and north west of the site with internal paths locating the two school buildings. Pedestrians can walk between the two school buildings via the external footpath that runs along Puddledock Lane. Hard play areas are located by the respective infant and junior buildings and playing field is to the south of these buildings. The site is predominately flat with a gentle slope up from south to north and east to west and the overall level change is 6 metres, with steps and level changes used to mitigate the impact of the slope.

Background

5. The Swanley/Hextable urban areas have been seeing an upsurge in demand for primary school places due to various new housing developments and the recent birth rate increase. In addition Sevenoaks District is experiencing significant inward migration both from London and other parts of Kent. This growth and migration brings new families to the area requiring enhancements to the infrastructure in order to meet the future needs of the town and its residents. Consequently there is a forecasted deficit of places for the Sevenoaks urban area from 2016 onwards.
6. Last year the Kent Commissioning Plan provided forecasts that indicated an increase in the demand for primary school capacity. Furthermore, this increased demand showed no signs of reducing over the forecast period.
7. The planning application proposes to expand the school from a 2FE (form entry) to a 3FE school. The present pupil roll is 393 and it is proposed to incrementally increase the pupil numbers by 30 new pupils every year until 2023, when upon completion of the development there would be 630 pupils. It is also proposed to increase staff numbers by an extra 14 so increasing the number of staff at this school from 60 to 74.
8. The current school hours are from 8am in the morning, as the school operates a breakfast club for those children that are signed up to it, whilst all the other school pupils arrive between 8.45 and 9.00am. In the afternoon there is a staggered pick up time. The infants are picked up at 3.15pm and the juniors are picked up at 3.30pm.

Recent Planning History

9. The most relevant recent site planning history is listed below:

SE/05/1088	Extension to office and front entrance. Granted planning permission.
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Proposal

10. This planning application has been submitted by Kent County Council's Capital Projects Team and proposes an additional 7 classrooms at the school with 3 additional classrooms at the infant school and 4 additional classrooms at the junior school. The proposed 3 classroom extension at the infant school would be linked to the existing building by a new corridor. All 3 classrooms would measure 60sqm (645.8sqft), with a store room in each classroom and an area for coats and a wet area. It is also proposed to provide a SEN room and additional toilets. An area of hard playground is also proposed around the extension. This development would then provide a total of 9 classrooms at the infant school.
11. At the junior school, it is proposed to build an additional 2 classrooms, both measuring 55sqm (592sqft) and including a store room and a wet area. These classrooms would

Expansion of school, Hextable Primary School – SE/16/1480

be linked to the existing school by a new corridor and additionally provide a small break-out space as well as 2 additional toilets. An extension to the existing school hall is also proposed which would increase the size of the existing school hall by 54sqm (581.3sqft). These extensions are proposed on the ground floor level of the junior school. Additionally there is currently a mobile building (container) which is used for storage located on the juniors' playground. It is proposed to permanently remove this mobile building from the site and replace it with a new building containing the library and a group room. The library would measure 44sqm (473.6sqft) and the group room would measure 66sqm (710.4sqft). This new building would also include a small lobby area, store and plant room and it would connect to the existing school building with a canopy link.

12. The school's current library is located in one of the three existing classrooms that are located on the first floor of the junior school and it is proposed to convert this classroom back to a teaching space. One of the seven existing classrooms located on the ground floor of the junior school is currently used as a resource room and it is proposed to relocate this function to the group room that is proposed to be located in the new building also housing the relocated library. This would then provide a total of 12 classrooms at the junior school.
13. As part of this planning application it is also proposed to provide a pupil pick-up/drop-off facility which would be located on land to the east of the existing school site and built on an area of open space belonging to Broomhill Bank School (the former Furnace School site). This area of open space has not been regularly used as a playing field in the last 5 years. This new pupil pick-up/drop-off facility would be accessed off Rowhill Road and located to the north of the existing pedestrian entrance to the junior school site. This facility would provide an area for parents to stop away from the public highway at peak times and would provide a total of 57 park-and-stride spaces as well as a drop-off bay. To facilitate safe pedestrian crossing from the proposed pick-up/drop-off facility to the school entrance on Rowhill Road, it is suggested that the existing School Crossing Patrol Officer should be relocated slightly to the north so that this is adjacent to the new access.
14. A Multi Use Games Area (MUGA) is also proposed as part of this application and located to the southern boundary of the school site and adjacent to Rowhill Road. This south-east corner of the playing field cannot be used during the winter months due to poor drainage and is unused in high summer as the ground becomes too hard for use. It is proposed that the MUGA would be of a sand or rubber crumb based synthetic turf surface with pitch marking for various sports to allow all year round outside use of this facility. A 3m (9.84ft) high weld mesh is proposed and currently there are no plans to provide any lighting or floodlighting. It is intended to allow the local community to use the MUGA during evenings, weekends and school holidays. A separate existing gateway access from Rowhill Road would be utilised to allow independent community use.

Amendment

15. The planning application has been amended slightly to address an objection raised by Sport England as part of consultation process. Around the proposed 3 classroom extension to the infant block there is a paved area which Sport England was concerned about encroaching too much onto the existing playing field and thus affecting the potential provision for sport. Sport England advised that to remove its objection that this proposed hard paved area be reduced in size so it would not encroach any further on the sports field than the proposed 3 classroom extension. This reduction in the

Expansion of school, Hextable Primary School – SE/16/1480

proposed paved area was duly carried out and Sport England removed its objection to this planning application.

Planning Policy Context

16. The most relevant Government Guidance and Development Plan Policies summarised below are appropriate to the consideration of this application:

- (i) **National Planning Policy and Guidance** – the most relevant national planning policies and policy guidance are set out in:

The **National Planning Policy Framework (March 2012)** and the **National Planning Policy Guidance (March 2014)** set out the Government's planning policy and guidance for England, and is a material consideration for the determination of planning applications. It does not change the statutory status of the development plan which remains the starting point for decision making. The NPPF and its guidance replace the majority of the former Planning Policy Guidance Notes (PPG's) and Planning Policy Statements (PPS's). However the weight given to development plan policies will depend on their consistency with the NPPF (the closer the policies in the development plan to the policies in the NPPF, the greater the weight that may be given).

In determining applications the NPPF states that local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. In terms of delivering sustainable development in relation to this development proposal, the NPPF guidance and objectives covering the following matters are of particular relevance:

- Consideration of whether the opportunities for sustainable transport have been taken up; safe and suitable access to the site can be achieved for all people; and that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe;
 - Achieving the requirement for high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
 - The great importance that the Government attaches to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities, and that great weight should be given to the need to create, expand or alter schools;
 - That access to high quality open spaces and opportunities for sport and recreation are important in their contribution to health and well-being, and therefore that existing open space, sports and recreation facilities should not be built on unless the loss would be replaced by equivalent or better provision in terms of quantity and quality.
- (ii) **Policy Statement – Planning for Schools Development (August 2011)** sets out the Government's commitment to support the development of State-funded schools, and their delivery through the planning system.

Expansion of school, Hextable Primary School – SE/16/1480

(iii) Development Plan Policies

The adopted **Sevenoaks District Core Strategy (February 2011)**

Policy L07 Development in Rural Settlements: Requires all new development to be of a scale and nature appropriate to the village concerned and should respond to the distinctive local characteristics.

Policy SP1 Design of New Development and Conservation: Requires all new development to be designed to a high standard, reflect the distinctive local character of an area, create safe, inclusive and attractive environments, incorporate sustainable development principles and maintain biodiversity.

Policy SP2 Sustainable Development: Sets standards for sustainable design and low energy generation. Proposals also cover measures to reduce the reliance on travel by car and seek to improve air quality.

Policy SP9 Infrastructure Provision: The Council will support the development of infrastructure facilities required to resolve existing deficiencies or to support the scale and distribution of development proposed.

Policy SP10 Green Infrastructure, Open Space, Sport and Recreation Provision: Promotes the provision of multifunctional green space by linking existing green space areas. The Policy also seeks the retention of open space, sports and recreational facilities, including indoor facilities of value to the local community, unless any loss can be justified by additional provision of at least equivalent value to the local community.

Policy SP11 Biodiversity: Seeks to conserve biodiversity, to ensure no net loss through development and to promote opportunities to enhance biodiversity.

The adopted **Sevenoaks Allocations and Development Management Plan (February 2015)**

Policy EN1 Design Principles: Sets out the need for high quality design and for proposals to meet criteria including: responding to scale, height and materials; respecting the topography and character of the site and any sensitive features; not result in the loss of buildings or open space that would affect the character of an area, provided satisfactory means of access and parking provision; include opportunities for increasing biodiversity potential, including sustainable drainage and to avoid harm to existing biodiversity; create a permeable layout; safe and easy access for those with disabilities; creation of a safe and secure environment to deter crime and fear of crime; include modern communication technology and infrastructure; and make efficient use of land.

Policy EN2 Amenity Protection: Proposals should provide adequate residential amenities for existing and future occupiers of development, and safeguard amenities of existing and future occupiers of nearby properties by ensuring development does not result in excessive noise, vibration, odour, activity, vehicle movements, overlooking or

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visual intrusion and where it would not result in a loss of privacy or light.

Policy GI 2 Loss of Open Space: Proposals which prevent the change of use or redevelopment of Open Space, including redundant school playing fields, unless it can be demonstrated that the open space is surplus to requirements, or that the loss will be mitigated by equivalent replacement provision. There should be no significant adverse impact upon the character of the local environment.

Policy T1 Mitigating Travel Impact: Sets out the need to mitigate against adverse travel impacts including their impact on congestion and safety, environmental impact such as noise, pollution and impact on amenity and health.

Policy T2 Vehicle Parking: Sets out that vehicle parking provision, including cycle parking, for non-residential developments should be in accordance with the advice of Kent County Council as Local Highway Authority.

Consultations

17. **Sevenoaks District Council:** Raises **no objection** to the planning application.

Hextable Parish Council: Raises **concern** and commented as follows:

“The Parish Council has concerns for the increased traffic, traffic flow and parking for the extra places planned for Hextable Primary School. We expect that planners will take this into consideration and may wish to look at alternatives to the current traffic flow system around Rowhill Road, Puddledock Lane and St David’s Road. Many residents have expressed their concerns for this to the Parish Council.”

Wilmington Parish Council (neighbouring Parish Council): Raises **concern** and comments as follows:

“It was noted that the site is outside of the Parish however some concern was expressed over a possible increase in traffic through Wilmington.”

Kent County Council Highways and Transportation: Raises **no objection** to the application and comments as follows:

“Whilst it is accepted that currently there is a certain amount of congestion on the roads surrounding the school at pupil start and finish times, it must be recognised that this only occurs during term time (30 weeks per year) and for relatively short periods in the mornings and mid-afternoon. Therefore it is considered that any mitigating measures need to be assessed against the overall impact for the short periods in which it may occur. Safety for vehicles, and more importantly pedestrians, is of the highest importance and it is not considered that the additional traffic generation as a result of the school expansion will compromise road safety.

The application is supported by a comprehensive and robust Transport Statement, the scope of which was discussed and agreed with KCC Highways prior to the application being submitted. The content and conclusions of that Transport Statement are found to be valid.

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The Transport Statement demonstrates that whilst there is likely to be an increase in vehicle movements in the roads surrounding the school due to an increase of pupil numbers from 420 to 630 pupils, and in teacher numbers from 60 to 74, this can be accommodated by a number of mitigating measures such as the provision of a new drop-off/parking area for parents and, most importantly, through a revised and updated School Travel Plan to encourage both pupils and teachers to walk/car share.

The proposed new drop-off/parking area to the east of Rowhill Road will accommodate up to 57 spaces which is considered to be adequate given the staggered start/finish times that the school currently, and will continue to operate. A Road Safety Audit has been undertaken in the proposal and provided the issue raised in the audit are addressed it does not result in any safety issues. This recommends that conditions are submitted that require the visibility splays as shown on the application drawing attached to the Transport Statement to be implemented and maintained in the future, and for the existing school crossing patrol to be maintained, or replaced with a suitable formal pedestrian crossing facility should the school crossing patrol cease to operate at any time in the future. A condition should also require the new drop-off/parking area to be constructed and completed prior to the expanded building coming into use.

It is estimated that the number of parking spaces available within the school grounds (44 spaces) should be adequate to accommodate the teaching/admin staff who drive to the school and this complies with the maximum parking standard specified in KCC's Parking Standards (SPG4). This takes into account the fact that a number of teachers are part time and therefore spaces can be "doubled up" and that the School Travel Plan will encourage more staff to use more sustainable methods of travel or car share. The situation of staff parking should be monitored in the future and it is suggested that some of the new parking provision off Rowhill Road could be utilised if found necessary since it is likely to be empty outside school start and finish times.

A condition should be applied to require a new School Travel Plan to be submitted and approved in co-ordination with KCC's School Travel Plan Officer with a target, as stated in the Transport Statement of reducing the number of pupils who travel to school by car by 10% in the first 3 years.

A further condition requiring the submission and approval of a Construction Management Plan should be applied to ensure that no additional road safety hazards are introduced during the construction period. This should cover such issues as deliveries, parking compound, hours of working and lorry routing.

In conclusion, I do not wish to raise an objection to this proposal since, whilst it is accepted that there may be additional congestion in the area at school start and finish times, these are of short duration and only during term times. In view of the policy given in NPPF Paragraph 32 which state among other things that development should not be refused on transport grounds unless the cumulative impact is severe, I do not consider this to be the case in this instance. The introduction of mitigating measures to reduce that impact, as discussed above, makes the application acceptable in highway terms."

County Ecology Officer: Further to initial comments and receipt of a Bat Report, makes the following comments:

"No bats were recorded emerging from the buildings during the emergence survey and as such it is concluded in the report that 'no further works in relation to bats is recommended'. It is our understanding that the potential bat roosting features identified during the ecological survey work will not be removed as a result of the

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proposed development. As such, we agree that there is no need for bat mitigation measures relating to impacts to roosting bats, if the works take place while these surveys remain time-valid.

As previously advised, the submission and implementation of the detailed methods to avoid and/or reduce the potential for impacts to reptiles and breeding birds must be secured by condition, if planning permission is granted. The submission and implementation of a detailed method for the precautionary approach to felling of the trees with bat roosting must be secured by condition, if planning permission is granted. The implementation of wildlife-sensitive lighting is recommended in the report. We advise that if any external lighting is proposed, the details, demonstrating adherence to the recommendations in the report, can be secured by condition, if planning permission is granted.

Measures to minimise the potential for impacts to mammals including hedgehogs are recommended in the Preliminary Ecological Appraisal report. We advise that the implementation of these measures must be secured by condition, if planning permission is granted.

One of the principles of the National Planning Policy Framework is that “opportunities to incorporate biodiversity in and around developments should be encouraged”. In addition to securing the implementation of the necessary mitigation measures, we advise that Kent County Council should also seek to ensure that ecological enhancement measures are provided within the landscaping of the proposed development site. The reports provide some recommendations; the details can be secured by condition, if planning permission is granted.”

School Travel Planner: Raises **no objection** subject to an updated School Travel Plan being conditioned and for the School to submit this via the Jambusters website.

Sport England: Further to its initial objection and upon receipt of revised drawings showing a reduced hard paved area around the proposed infants block extension, Sport England raises **no objection** to this planning application and has the following comments:

The proposed revisions involve the reduction of the proposed hard paved area adjacent to the proposed extension to building 1, changes to proposed building 1 and the omission of the proposed cycle bays. The hardstanding area now proposed is considered to represent a minor encroachment onto the playing field but having considered the nature of the playing field and its ability to accommodate sports pitches; it is not considered that this element of the proposed development would reduce the sporting capability of the site. As such, Sport England is satisfied that this element of the proposed development now broadly meets the intention of the following Sport England Policy exception E3.

Overall, Sport England now **does not wish to raise an objection** to this application to the revised scheme provided a condition is imposed in order to facilitate community use of the Multi Use Games Area as indicated in the Design, Access and Planning Statement.

Environment Agency: no response received.

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Local Member

18. The local County Member, the late Mr Robert Brookbank, was notified of the application on 16 May 2016. Mr Brookbank made the following comments:

“After further consultation with the Parish Council and other interested parties, it is apparent that the only objection to the proposal will be the general one about the increase in traffic in the centre of the village, which applies throughout the County.”

Publicity

19. The application was advertised by the posting of site notices, and the notification of 48 neighbours.

Representations

20. Three letters of representation have been received, objecting to the application. The main points of the objection can be summarised as follows:

- The roads around these schools are unable to cope with the level of traffic generated by the existing size of these schools.
- Although providing a pupil pick up/drop off facility at the junior school will alleviate some of the problems for them, this will do nothing for the extra chaos being created at the infant school. There is doubt raised regarding the effectiveness of this facility.
- As there is no substantial new building taking place in Hextable, the vast majority of the new pupils attending the schools will come from outside the area with most of them arriving by car.
- Every day the traffic situation in St David’s Road sees cars being driven along the pavement amongst the pedestrian parents and children as the road is not wide enough to cope with 2 lanes of traffic and parked cars along one complete side.
- This application does not address the parking problems in St David’s Road at drop off/pick up points and causing congestion as it is too far from the Infants School for parents to use it.

Discussion

21. In considering this proposal regard must be had to Development Plan Policies outlined in paragraph (16) above. Section 38(6) of the Planning and Compulsory Purchase Act (2004) states that applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. Therefore, this proposal needs to be considered in the context of Development Plan Policies, Government Guidance, including the National Planning Policy Framework (NPPF), Planning Policy Statement for Schools Development and other material planning considerations arising from consultation and publicity.

22. This application has been reported for determination by the Planning Applications Committee following the receipt of objections from 3 local residents. The main issues relating to this objection are on traffic grounds, local congestion and lack of parking around the school site. Initial objections and concerns from Sport England and the County’s Ecologist have been addressed through negotiation and subsequently been withdrawn.

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Transport Issues

23. The planning application proposes to expand Hextable Primary School from a 2FE (420 pupils) to a 3FE (630 pupils). It is proposed to incrementally increase the pupil numbers by 30 new pupils every year until the school reaches this capacity in 2023. It is also proposed to increase staff numbers by an extra 14 so increasing the number of staff at this school from 60 to 74. Whilst it is not proposed to increase the number of staff parking spaces, albeit to re-mark the worn out parking lines in the existing infant staff car park, it is proposed to provide a new pupil pick-up/drop-off facility, which would provide a total of 57 park-and-stride spaces as well as a drop-off bay on land to the east of Rowhill Road, currently located at Broomhill Bank School.
24. The application was supported by the submission of a Transport Statement, which considered the impact the development would be likely to have on the capacity of the existing highway network and the parking demand on the surrounding streets. Kent Highways has considered the statement and the calculations of the existing trip attractions and the proposed number of additional vehicles that are likely to be associated with the increase in pupils and staff numbers.
25. The general impact of the additional pupil numbers is that a predicted further 72 vehicles would be associated with each school drop off and collection period. This impact would be more noticeable at the afternoon collection time, as parents wait for the children to be released and therefore park over a longer period, rather than dropping off and continuing on their journey. However this predicted increase in vehicles assumes a worst case scenario with a 100% pupil attendance rate and no consideration of the distribution of these additional vehicle movements on the local network. It is likely that the assignment of these trips would be split between Puddledock Lane, Rowhill Road and St David's Road. Further it is apparent that the School already implements a staggered departure times between the infant and junior school, which spreads the traffic flows over a greater period of time and thus reducing the level of traffic impact.
26. It is noted that pupil pick-up and drop-off currently takes place on the local highway network surrounding the school as there are no on-site facilities to accommodate this. As a result of the proposed uplift in pupil numbers it is expected that there would be an additional 72 vehicles in the peak hours on the highway network. Therefore to mitigate the traffic impacts as a result of the additional traffic, it is proposed to provide a new car parking facility on land to the east of the school site which would be accessed via a new priority junction on Rowhill Road. This facility would provide 57 park-and-stride spaces plus a drop-off bay to be used by parents in the peak hours. Additionally the 57 park-and-stride spaces would be used on a multiple number of times during the morning drop-off period as parents arrive at school over a wider period of time, and could feasibly accommodate the extra traffic that would be generated. It is also proposed that a one-way loop in a clockwise direction would be enforced through the site to ensure that the facility operates efficiently. The existing access to the junior school staff car park, which lies directly opposite the proposed access, would be closed at peak times. To ensure pedestrian safety a hatched pedestrian walkway would be provided and a 1.8 metre (5.9ft) footway to the south of the drop-off bay, connecting with the site access.
27. It must also be noted that Kent Highways has raised no objection to this application. Whilst it is accepted that currently there is a certain amount of congestion on the roads surrounding the school at pupil start and finish times, it has been recognised that this only occurs during term time and for about 30 weeks per year. It is also for a relatively short period of time in the morning and mid-afternoon. Kent Highways have also

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accepted that the content and conclusions reached in the Transport Statement as being valid. Not all the new additional pupils would be driven to school and so some would walk to school, or may travel in existing vehicles either through car sharing or because they already have siblings at the school.

28. Whilst it is proposed to increase staff numbers by 14 to 74 members of staff, there are no proposals to provide more on-site parking for staff as it has been concluded that there is adequate parking provision. An assessment was carried out in the Transport Statement and based on a recent staff travel survey, which concluded that the staff car driver mode share of 81% would result in a demand for up to 45 staff car parking spaces to accommodate the full time staff that would be parked at the site throughout the day. Given that a total of 44 spaces are available to staff within the school site, then the current car park would accommodate these members of staff. Furthermore, through the introduction of a School Travel Plan and regular monitoring, the School would aim to introduce measures as to encourage more members of staff to share car trips or to encourage other ways of travelling to school, and so that could further reduce the demand for the number of staff members travelling and parking at the school.
29. However this application has met with objection from local residents living in St David's Road on traffic and parking grounds. They consider that the current level of parking at school start and finish time is unacceptable and that the road is unable to cope with any more traffic. Whilst a parking facility by the junior school is being proposed to help cope with the extra demand for parking that expanding the school would generate, residents of St David's Road feel that this facility is too far away to have any impact upon reducing traffic and parking by the infant school. Like hundreds of other schools in Kent, the premises are located in a primarily residential area and are accessed by the public highway. Whilst inevitably there is some competition for road space, typically resulting in localised congestion, that congestion is often for relatively short periods of time. Whilst some nuisance is incurred, such congestion equates to less than 10% of the working day and occurs on less than 60% of the total days in the year. It is not a continuously experienced problem of a magnitude that might otherwise warrant refusal of planning permission for development proposals.
30. Moreover, the public highway is there to be used by the public, whether as residents, visitors, employees or others, and no one category of user has priority, so the use of our roads has to be shared by different users at different times of the day. Friction tends to arise when the public all want to use the public highway at the same time, but the only solution to that is better management of the available facilities, including spreading of the load with multiple access points, managing demand by the staggering of hours, improving existing on-site parking facilities, including pupil drop-off facilities for parents, and encouraging alternative modes of travel to school. All of these initiatives are incorporated within these planning proposals, and can be secured through the Travel Plan process if planning consent were to be given.
31. Furthermore the school currently has no on-site parking facilities for parents and so all parents that drive to school have to park out on the public highway. This planning application proposes a pupil pick-up/drop facility plus a total of 57 park-and-stride parking spaces, which would provide for the first time a dedicated area for parents to park off the public highway, and thus to relieve some of the current on-street parking in the surrounding roads around the school.
32. In conclusion, I do not wish to raise an objection to this proposal since, whilst it is accepted by Kent Highways that there may be some additional congestion in the area at school start and finish times, these are of short duration and only during term times.

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In view of the policy given in NPPF Paragraph 32 which state among other things that development should not be refused on transport grounds unless the cumulative impact is severe, I do not consider this to be the case in this instance. The introduction of mitigating measures to reduce that impact, as discussed above, makes the application acceptable in highway terms. As such it is considered that the application would accord with Policy T1 and T2 of the Sevenoaks Allocations and Development Management Plans and Paragraph 32 of the NPPF. Under the circumstances, I would therefore not raise a planning objection to the proposal on highway grounds.

Need

33. As outlined in paragraph 16 of this report, great emphasis is placed within planning policy generally, specifically paragraph 72 of the NPPF, on the need to ensure a sufficient choice of school places is available to meet the needs to existing and new communities. The NPPF states that Planning Authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. The NPPF further states that Planning Authorities should give great weight to the need to create expand or alter schools. The Policy Statement – Planning for Schools Development (15 August 2011) further sets out the Government's commitment to support the development of state funded schools and their delivery through the planning system. In addition, Sevenoaks District Core Strategy contains planning objectives that support the improvement of facilities where necessary. In particular, Policy SP9 of the Core strategy seeks to support the development of infrastructure facilities required to resolve existing deficiencies, with the definition of 'infrastructure' encompassing education and community facilities.
34. The applicant has identified an upsurge in the demand for primary school places within the Sevenoaks South area, and a future need which will be outstripped by demand unless additional places are provided. Support for the provision of school places is heavily embedded in the NPPF and local planning policy, and I consider that the need for the development should be given significant weight in this instance.

Design and layout

35. Development Plan Policies promote high quality design, sustainable development and significant improvements to the built environment. The proposed buildings would be independent single storey structures with thermally efficient clear span spaces. The locations of the new buildings have been proposed in order to minimise any external visual impact, with designs that are complementary and subordinate to the existing locations. The proposed location, with the exception of the single classroom proposed to the eastern frontage of the junior school, all of the other proposed extensions are to the rear of the existing school buildings and are therefore not visible from the public realm. All the new buildings are proposed to be constructed in complementary materials and fenestration to the existing school buildings and are all proposed to be single storey extensions with flat roofs.
36. The various extensions would encroach upon the various existing hard and soft play areas around both the infant and junior school blocks, however there is sufficient land to enable these facilities to be replaced and educational requirements in terms of soft and hard play areas to be compiled with. This replacement and improvements includes the provision of the proposed MUGA to the south east corner of the site and the minor relocation of the existing playing pitch to accommodate that facility. The overall development concept is to provide a series of small scale alterations and additions to achieve the additional floor space, hard surface play space and improved drop-off/pick-up facilities for parents.

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37. Members will note that no objection has been received to the proposed location or design of the various extensions to the school. However in order to control the development and to ensure the satisfactory appearance of the proposed development, I consider that final details of all materials to be used externally should be submitted pursuant to condition, should permission be granted. Subject to the imposition of this condition, I consider that the design and layout of the proposed development to be acceptable and I would therefore not raise a planning objection on this matter.

Open space

38. The school's playing field and the area of open land to the north of Broomhill Bank School are both covered by the District Council's Open Space Policy, which states that a change of use or redevelopment of these spaces will not be permitted unless the applicant can demonstrate that the open space is surplus to requirement and that there is no need for an appropriate alternative community, sports or recreational use or the loss would be mitigated by equivalent replacement provision or that the development is for alternative sports/recreation use.
39. The applicant has confirmed that at Hextable Primary School there is an existing surplus of playing field provision and the small loss of the existing playing field will be offset by the provision of the MUGA, which will provide both an educational use as well as a community use. Additionally the MUGA would occupy existing playing field land that is currently not used during the winter months due to poor drainage and unused in high summer as the ground becomes too hard for use. Furthermore the MUGA would be available at all times for the schools use as well as out of school hours use by the local community. The proposed MUGA would not affect the existing marked out formal pitch areas. Sport England and Sevenoaks District Council have raised no objection to this element of the planning application.
40. The area of open land to the north of Broomhill Bank School, which is identified as being Open Land by Sevenoaks District Council, has not been regularly used as playing field for over 5 years and is deemed as being surplus to the school's requirement. It is proposed to locate the pupil drop-off/pick up facility as well as the 57 park-and-stride spaces here. It should be noted that the loss of this area of open space for the community is offset by the proposed provision of the MUGA on the Hextable Primary School site. There would be no significant adverse impact upon the character of the area as the site is reasonably well shielded and enclosed by the boundary hedgerow. The openness of this area would also be retained for the majority of the time as this parking area would only be used for a short time during the morning drop off and afternoon collection times, and only during school term time. For the rest of the time, this area will retain the current openness of this site. Neither Sport England or Sevenoaks District Council have raised objection to this element of the planning application.
41. I am satisfied that thorough consideration has been given to the proposed loss of both of the Open Spaces and as such it is considered that the application would accord with Policy GI 2 of the Allocations and Development Management Plan. Under the circumstances, I would therefore not raise a planning objection on this matter.

Conclusion

42. In summary the proposal seeks to provide additional primary school places to meet local need and is in accordance with planning policy to support the improvement of local infrastructure, as set out in the Sevenoaks District Core Strategy;

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the Sevenoaks Allocations and Development Management Plan; the NPPF and the Policy Statement – Planning for Schools Development. I consider that, subject to the imposition of appropriate planning conditions, this proposed development constitutes sustainable development, with an appropriate level of new off-street parking facilities for parents in the form of a 57 park-and-stride car park and parent’s drop-off area. Whilst the proposed development will generate an increase in traffic, Kent Highways are satisfied that this proposal is acceptable, subject to the imposition of conditions and its impact would not be severe. In addition weight should also be given to the NPPF’s clear policy support for ensuring that a sufficient choice of school places be available to meet the needs of existing and new communities, and the need to create, expand or alter school. In my view, the development would not give rise to any significant material harm and is in accordance with the general aims and objectives of the relevant Development Plan Policies, as well as the National Planning Policy Framework. I am not aware of any material planning considerations that indicate that the conclusion should be made otherwise.

Recommendation

43. I RECOMMEND that PERMISSION BE GRANTED, subject to the imposition of conditions covering (amongst other matters) the following:

- The standard 5 year time limit;
- The development carried out in accordance with the permitted details;
- The submission of details of all materials to be used externally;
- A scheme of soft and hard landscaping and its implementation and maintenance;
- Measures to protect trees to be retained;
- No tree removal during the bird breeding season;
- The submission and implementation of detailed method statement to avoid and/or reduce the potential for impacts to reptiles and breeding birds;
- Measures to minimise the potential for impacts to mammals including hedgehogs as recommended in the Preliminary Ecological Appraisal report;
- Details of any external lighting to be provided;
- Provision and permanent retention of new drop-off parking area prior to the occupation of the proposed development;
- Visibility splays to be provided as approved and to be maintained;
- Hours of working during construction to be restricted to between the hours of 0800 and 1800 Monday to Friday and between the hours of 0900 and 1300 on Saturdays, with no operations on Sundays and Bank Holidays;
- Measures to prevent mud and debris being taken onto the public highway;
- The submission of a construction management plan, including lorry routing, access, parking and circulation within the site for contractors and other vehicles related to construction operations;
- The retention of school crossing facilities across Rowhill Road;
- The submission of a revised School Travel Plan, within 3 months of the occupation of the new buildings, via the Jambusters website and be the placed on the school’s website and for the Travel Plan to be reviewed annually;
- A Community Use Agreement relating to the MUGA including hours of use.

Case officer – Lidia Cook	03000 413353
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Background documents - See Section heading
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E1 COUNTY MATTER APPLICATIONS AND DETAILS PURSUANT PERMITTED/APPROVED/REFUSED UNDER DELEGATED POWERS - MEMBERS' INFORMATION

Since the last meeting of the Committee, the following matters have been determined by me under delegated powers:-

Background Documents - The deposited documents.

- | | |
|-------------------------|---|
| AS/10/295/R | Application for a non-material amendment to the approved site layout and relocation of the site access road.
Waterbrook Park, Waterbrook Avenue, Sevington, Ashford
Decision: Approved |
| DA/16/857 | Addition of supplementary materials recycling equipment
Pinden Quarry, Green Street Green Road, Dartford
Decision: Permitted |
| GR/16/388 | Erection of a combined heat and power plant kiosk
Gravesend Wastewater Treatment Works, Dering Way, Gravesend
Decision: Permitted |
| MA/13/2191/R3, 4, 5 & 6 | Submission of a landscape strategy and planting specification pursuant to condition (3), a scheme of external lighting pursuant to condition (4), a drainage scheme pursuant to condition (5) and details of ground conditions pursuant to condition (6) of planning permission MA/13/2191 for a waste management facility.
Units 6, 13, 14 and Adjacent Unit, Detling Aerodrome Industrial Estate, Detling, Maidstone
Decision: Approved |
| SW/16/501484/R12 | Details of proposed landscaping to the front of the site pursuant to condition (12).
Countrystyle Recycling Storage Land, Ridham Dock, Iwade, Sittingbourne
Decision: Approved |
| TM/00/1599/R26b | Request, pursuant to condition (26) of planning permission TM/00/1599, to extend the period for the cessation of operations until 31 October 2018.
Stonecastle Farm Quarry, Whetsted Road, Five Oak Green, Tonbridge, Kent
Decision: Approved |
| TM/16/1563 | Section 73 application for variation of hours of operation to allow importation of construction aggregates on bank and public holidays, to include the loading and despatch of conditioned Pulverised Fuel Ash (PFA) via a maximum of 30 lorry loads (total of 60 movements) from the site.
Land at East Peckham Rail Depot, East Peckham
Decision: Permitted |

**E2 COUNTY COUNCIL DEVELOPMENT APPLICATIONS AND DETAILS
PURSUANT PERMITTED/APPROVED UNDER DELEGATED POWERS
MEMBERS' INFORMATION**

Since the last meeting of the Committee, the following matters have been determined by me under delegated powers:-

Background Documents – The deposited documents.

- AS/15/648/R24 Details pursuant to condition (24) - Details of a Construction Management Strategy for Phase 1 of the development of planning permission AS/15/648.
Land at Finberry Village, Mersham, Ashford, Kent
Decision: Approved
- AS/15/648/RVAR Details of external materials, external lighting, a scheme of landscaping, outbuildings and external storage structures, fencing, gates and means of enclosure, kitchen extract flue, remediation strategy regarding contaminated land, car park layout plan and on site cycle parking pursuant to conditions (3), (4), (5), (7), (8), (9), (13), (18) and (19) of planning permission AS/15/648.
Land at Finberry Village, Mersham, Ashford, Kent
Decision: Approved
- AS/16/548 Construction of a new part single part two storey extension together with parking, landscaping and ancillary works
The Wyvern School, Great Chart Bypass, Ashford, Kent, TN23 4ER
Decision: Permitted
- CA/15/2379/R3 Details of External Materials pursuant to condition (3) of planning consent CA/15/2379.
Hoath Primary School, School Lane, Hoath, Canterbury
Decision: Permitted
- CA/15/2379/R4 Details of Landscaping pursuant to condition (4) of planning consent CA/15/2379.
Hoath Primary School, School Lane, Hoath, Canterbury
Decision: Permitted
- CA/15/2379/R9 Details of Construction Management Plan pursuant to condition (9) of planning consent CA/15/2379.
Hoath Primary School, School Lane, Hoath, Canterbury
Decision: Approved
- CA/16/985 Twin classroom building required temporarily from September 2016 to September 2017
Spires Academy, Bredlands Lane, Sturry, Canterbury, Kent, CT2 0HD
Decision: Permitted
- CA/16/1224 Enlargement of existing car park.
Blean Primary School, Whitstable Road, Blean, Canterbury, Kent, CT2 9ED
Decision: Permitted

CA/16/1331	Renewal of planning permission for a mobile classroom unit. Barham C Of E Primary School, Valley Road, Barham, Canterbury, Kent, CT4 6NX Decision: Permitted
CA/16/1436	Erection of a two storey building as a creative research centre. Simon Langton Grammar School For Boys, Simon Langton Grammar School For Boys, Langton Lane, Canterbury, Kent, CT4 7AS Decision: Permitted
CA/16/1553	Erection of timber framed outdoor classroom Herne C Of E (Controlled) Infants School, Palmer Close, Herne Bay, Kent, CT6 7AH Decision: Permitted
DA/16/511	Installation of a Multi-Use-Games-Area, a recreation area and a wooden seating area Bean Primary School, School Lane, Bean, Dartford, Kent, DA2 8AW Decision: Permitted
DA/16/878	New temporary single storey mobile classroom, including ramped and stepped access The Brent Primary School, London Road, Stone, Dartford, Kent, DA2 6BA Decision: Permitted
DO/15/1079/R20	Details pursuant to conditions (20) - written specification of archaeological field evaluation of planning permission DO/15/1079. Portal House School, Sea Street, St Margarets At Cliffe, Kent, CT15 6SS Decision: Approved
DO/15/1079/RVAR	Discharge of conditions 3 & 4 (Materials), 14 (Contamination), 18 & 19 (Surface water drainage) and 21 (Archaeology) of planning permission DO/15/1079 Portal House School, Sea Street, St. Margarets-At-Cliffe, Dover, Kent, CT15 6SS Decision: Approved
DO/15/1080/R7	Details of new parking area pursuant to condition (7) of planning permission DO/15/1080. Green Park Community Primary School, The Linces, Dover, Kent, CT16 2BN Decision: Approved
DO/16/656	Proposed double classroom modular building and extension to existing car park to provide 10 parking spaces. Whitfield & Aspen School, Mayfield Road, Whitfield, Dover Decision: Permitted
DO/16/658	Extension to smile centre to provide improved changing facilities, disabled wc & lobby Whitfield & Aspen School, Mayfield Road, Whitfield, Dover, Kent, CT16 3LJ Decision: Permitted

- DO/16/659 Proposed extension to the existing main school building at Sibertswold CE Primary School to provide a single new classroom space and removal of existing mobile classroom building from the school field
Sibertswold CEP School, Coldred Road, Shepherdswell, Dover, Kent, CT15 7LF
Decision: Permitted
- DO/16/677 Provision of 1no. temporary portable building for use as a classroom during and up to the completion of the building works for the 1FE extension to the existing school building
White Cliffs Primary College for the Arts, St Radigunds Road, Dover, Kent, CT17 0LB
Decision: Permitted
- DO/16/688 Renewal of planning permission for double classroom mobile unit situated to the front of Nonington Primary School
Nonington CEP School, Church Street, Nonington, Dover, Kent, CT15 4LB
Decision: Permitted
- DO/16/689 Renewal of planning permission for the mobile classroom unit situated to the rear of St Margaret's at Cliffe Primary School
St Margarets-At-Cliffe Primary School, Sea Street, St Margarets-At-Cliffe, Dover, Kent, CT15 6SS
Decision: Permitted
- DO/16/690 Renewal of planning permission for the temporary mobile classrooms at Portal House School
Portal House School, Sea Street, St. Margarets-At-Cliffe, Dover, Kent, CT15 6SS
Decision: Permitted
- DO/16/808 Retrospective application for the retention of a 3 bay mobile classroom unit
Vale View Community School, Vale View Road, Dover, Kent, CT17 9NP
Decision: Permitted
- GR/15/893/R8&R11 Details of updated school travel plan and specification for archaeological field evaluation works pursuant to conditions 8 and 11 of planning permission GR/15/893
Singlewell Primary School, Mackenzie Way, Gravesend, Kent, DA12 5TY
Decision: Approved
- GR/16/568 Proposed Dining Room Extension.
Northfleet School For Girls, Hall Road, Northfleet, Gravesend, Kent, DA11 8AQ
Decision: Permitted
- GR/16/588 To install 1No additional UPVC window and remove/enlarge 2No UPVC windows to the existing library.
Shears Green Junior School, White Avenue, Northfleet, Gravesend
Decision: Permitted

MA/16/503892	<p>Full planning application for the proposed erection of a new part single and part two storey school building, minor alternations to existing school buildings including new entrance lobby, new playground area, relocated outdoor apparatus equipment together with associated parking and landscaping works to accommodate a 1 Form of Entry expansion</p> <p>Headcorn Primary School, Kings Road, Headcorn, Ashford, Kent, TN27 9QT</p> <p>Decision: Permitted</p>
SE/16/141/RVAR	<p>Details of all materials to be used externally, Biodiversity Management Plan, sustainable surface water drainage scheme, unexpected contamination and Construction Management Scheme Plan pursuant to conditions (3), (10), (13), (16) and (20)</p> <p>Sevenoaks Primary School, Bradbourne Park Road, Sevenoaks, Kent, TN13 3LB</p> <p>Decision: Approved</p>
SE/16/141/R8	<p>Details of all materials to be used externally, Biodiversity Management Plan, sustainable surface water drainage scheme, unexpected contamination and Construction Management Scheme Plan pursuant to conditions (3), (10), (13), (16) and (20)</p> <p>Sevenoaks Primary School, Bradbourne Park Road, Sevenoaks, Kent, TN13 3LB</p> <p>Decision: Approved</p>
SE/16/1463	<p>Single storey extension to the southern facade to provide enlarged teaching accommodation (34 sqm).</p> <p>Ide Hill CE Primary School, Sundridge Road, Ide Hill, Sevenoaks</p> <p>Decision: Permitted</p>
SE/16/1996	<p>Reception Extension to main school building</p> <p>Lady Boswell's CE Primary School, Plymouth Drive, Sevenoaks, Kent, TN13 3RW</p> <p>Decision: Permitted</p>
SH/16/511/R	<p>Non-material amendment to enclose over external fire escape (alteration of door to window)</p> <p>Hawkinge Primary School, Canterbury Road, Hawkinge, Folkestone, Kent, CT18 7BN</p> <p>Decision: Approved</p>
SW/15/505008	<p>Renewal of planning consent SW/11/1452 for the mobile classroom unit situated to the front of Eastchurch Primary School</p> <p>Eastchurch C Of E Primary School, Warden Road, Eastchurch, Sheerness, Kent, ME12 4EJ</p> <p>Decision: Permitted</p>
SW/15/510165/R4	<p>Details pursuant to condition (4) of planning consent SW/15/51065.</p> <p>Meadowfield School, Swanstree Avenue, Sittingbourne, Kent, ME10 4NL</p> <p>Decision: Approved</p>

- SW/16/505133 Renewal of planning permission for 3 mobile classroom units.
Boughton-under-Blean & Dunkirk Primary School, School Lane,
Boughton-under-Blean, Faversham
Decision: Permitted
- SW/16/505321 Two no. single storey classroom extensions with integral assisted wc
and storage together with associated external works to form play
areas.
Meadowfield School, Swanstree Avenue, Sittingbourne, Kent, ME10
4NL
Decision: Permitted
- SW/16/505845 Temporary single storey classroom building. Required for the period
between September 2016 and February 2017
West Minster Primary School, St. Georges Avenue, Sheerness,
Kent, ME12 1ET
Decision: Permitted
- TM/15/3918/R16 Details of a Community Use Agreement pursuant to condition (16) of
planning permission TM/15/3918.
Land off Lower Haysden Lane, Tonbridge, Kent
Decision: Approved
- TW/15/508363/R4&5 Submission of details of external lighting (Condition 4) and signage
(Condition 5) pursuant to planning permission TW/15/508363
Wedge Car Park, Knights Way, Tunbridge Wells, Kent, TN2 3UW
Decision: Approved

E3 TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2011 – SCREENING OPINIONS ADOPTED UNDER DELEGATED POWERS

Background Documents –

- *The deposited documents.*
 - *Town and Country Planning (Environmental Impact Assessment) Regulations 2011.*
 - *DETR Circular 02/99 – Environmental Impact Assessment.*
- (a) Since the last meeting of the Committee the following screening opinions have been adopted under delegated powers that the proposed development does not constitute EIA development and the development proposal does not need to be accompanied by an Environmental Statement:-

KCC/SE/0183/2016 - New single storey classroom block and extension to the existing school kitchen.
Hever C Of E Primary School, Hever C Of E Primary School, Hever Road, Hever,

- (b) Since the last meeting of the Committee the following screening opinions have been adopted under delegated powers that the proposed development does constitute EIA development and the development proposal does need to be accompanied by an Environmental Statement:

None

E4 TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2011 – SCOPING OPINIONS ADOPTED UNDER DELEGATED POWERS

- (b) Since the last meeting of the Committee the following scoping opinions have been adopted under delegated powers.

Background Documents -

- *The deposited documents.*
- *Town and Country Planning (Environmental Impact Assessment) Regulations 2011.*
- *DETR Circular 02/99 - Environmental Impact Assessment.*

KCC/SCO/DA/01711/2016 - Proposed Section 73 Application to vary permission DA/13/206 to allow the erection of a processing plant and ancillary buildings and amendments to timescales.

Joyce Green Farm, Joyce Green Lane, Dartford, Kent, DA1 5PN

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