

Proposed 2 FE expansion, involving the erection of a new freestanding 2-storey school building, new staff car park, new parent car park and drop off/pick up area, with associated access, signage and landscaping works at Meopham School, Wrotham Road, Meopham, Kent, DA13 0AH – GR/22/110 (KCC/GR/0014/2022)

A report by Head of Planning Applications Group to Planning Applications Committee on 20 July 2022.

Application by Kent County Council Infrastructure Division for a proposed 2FE expansion, involving the erection of a 2-storey free standing building, new staff and parent car park and drop off/pick up area, with associated access, signage, and landscaping – Meopham School, Wrotham Road, Meopham, DA13 0AH (Ref: KCC/GR/0014/2022 and GR/22/110).

Recommendation: The application be referred to the Secretary of State for Levelling Up, Housing and Communities as a departure from the Development Plan on Green Belt grounds, and to consider the Sport England objection, and that SUBJECT TO his decision, and completion of a Memorandum of Understanding regarding the required monetary contribution for the School Travel Plan and Public Transport Capacity Improvements planning permission to be granted, subject to conditions.

Local Member: Mr B Sweetland

Classification: Unrestricted

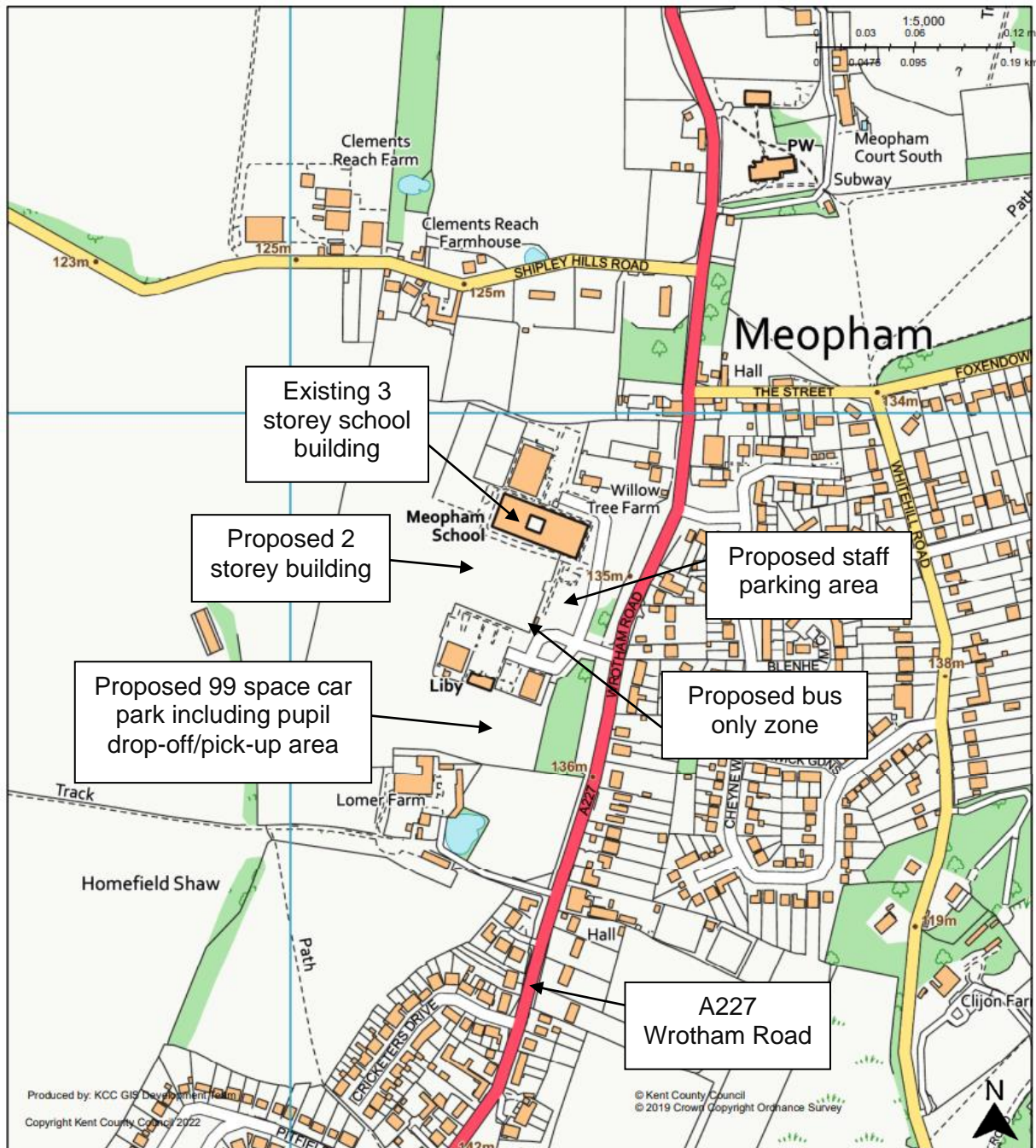
Site

1. The application site is located within the existing Meopham School site. The School is located on the west side of Wrotham Road (A227) in Meopham, which is a village approximately 5 miles south of Gravesend. The A227 is the main road running north-south through the village and connects with the A2 to the north and the M20 to the south. The school site lies adjacent to the settlement of Meopham Green. The school occupies a regular parcel of land of approximately 9.6 hectares. Meopham School is set back from Wrotham Road and separated by a green landscaped buffer area. The built-up part of the site is comprised of a 3-storey building orientated in a north west to north east direction and located to the north side of the sites only vehicular and pedestrian entrance. Behind the school building and located to the west are the school's playing fields. To the north of the existing 3-storey building is the Meopham Fitness and Tennis Centre and to the south of the school building is Meopham Medical Centre, Meopham Library, and the Busy Bees Nursery. The Meopham School entrance from Wrotham Road is shared with these neighbouring users. To the east of the school site and on the opposite side of Wrotham Road is residential development. The School site is immediately surrounded to the west by agricultural land, to the north by the rear gardens of properties along Shipley Hills Road, and to the south by a working Farm. Further afield the site is surrounded by residential development to the south and east and agricultural land to the north and west. Dense hedgerows surrounding the perimeter of the site conceals much of the visual impact of the school buildings from the nearby residential areas and farmland. Please refer to the Site Location Plan.

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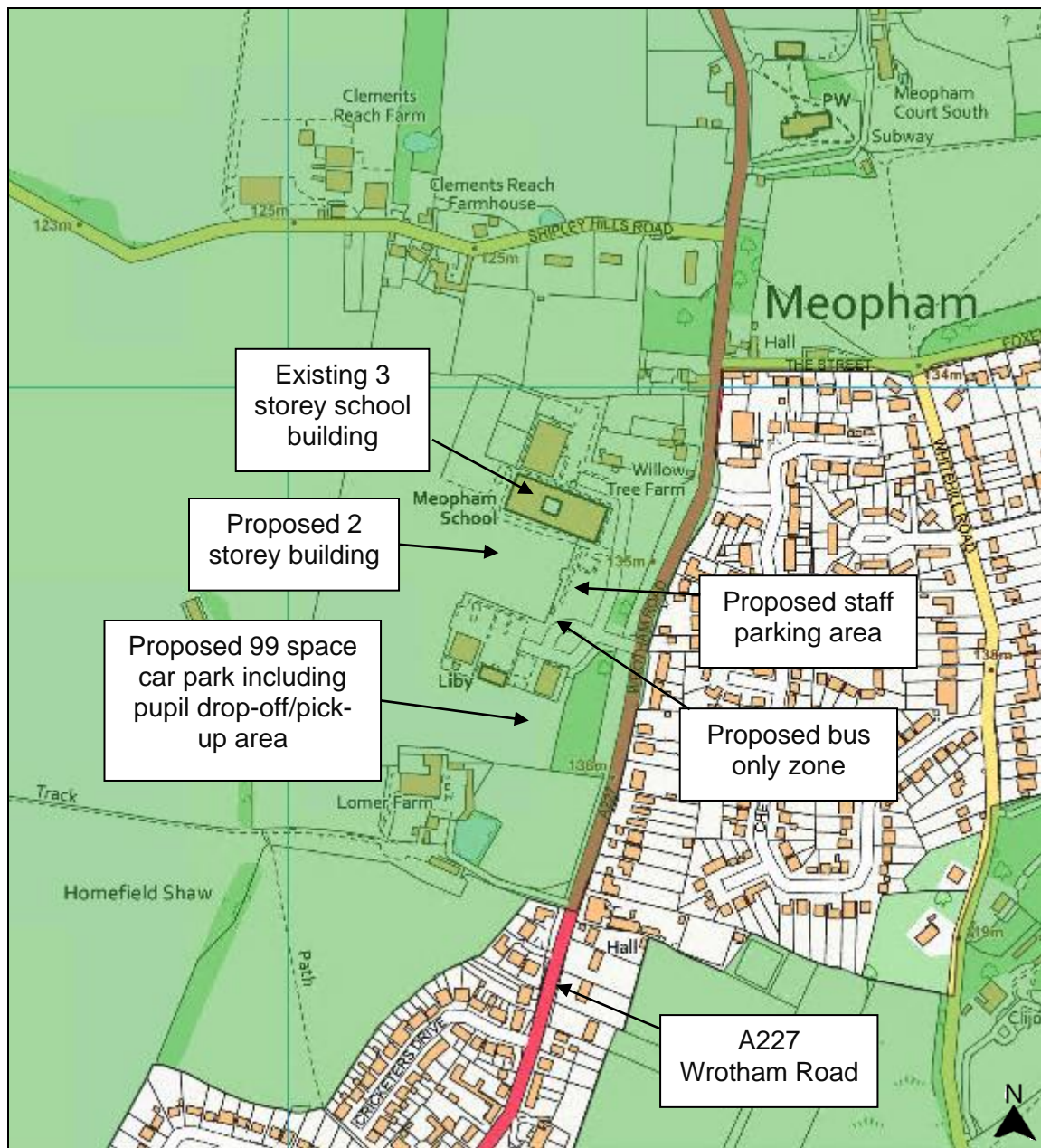
Site Location Plan



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Site Location Plan with Greenbelt

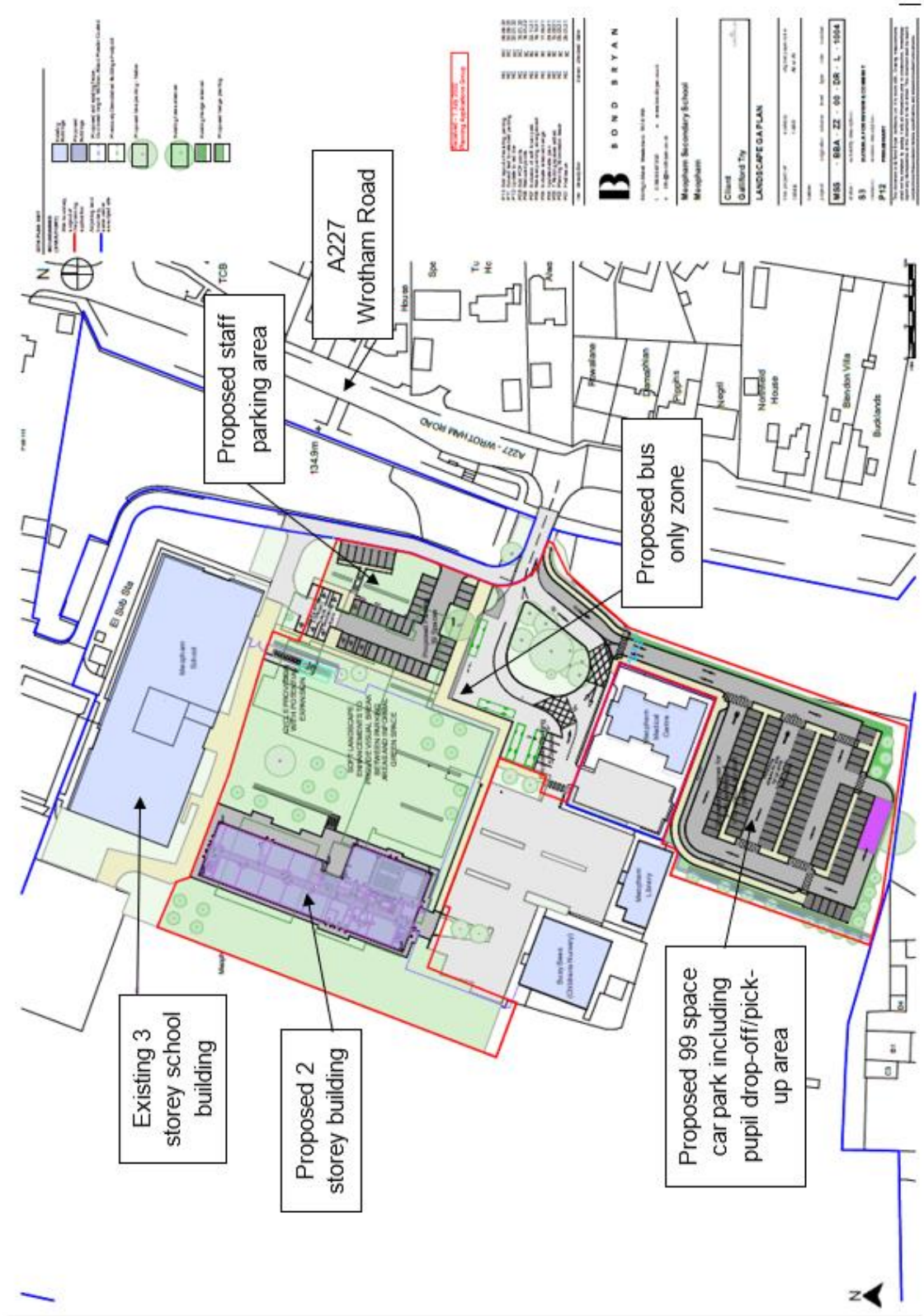


Greenbelt

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Site Location Plan with labels



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Existing Site Location Plan



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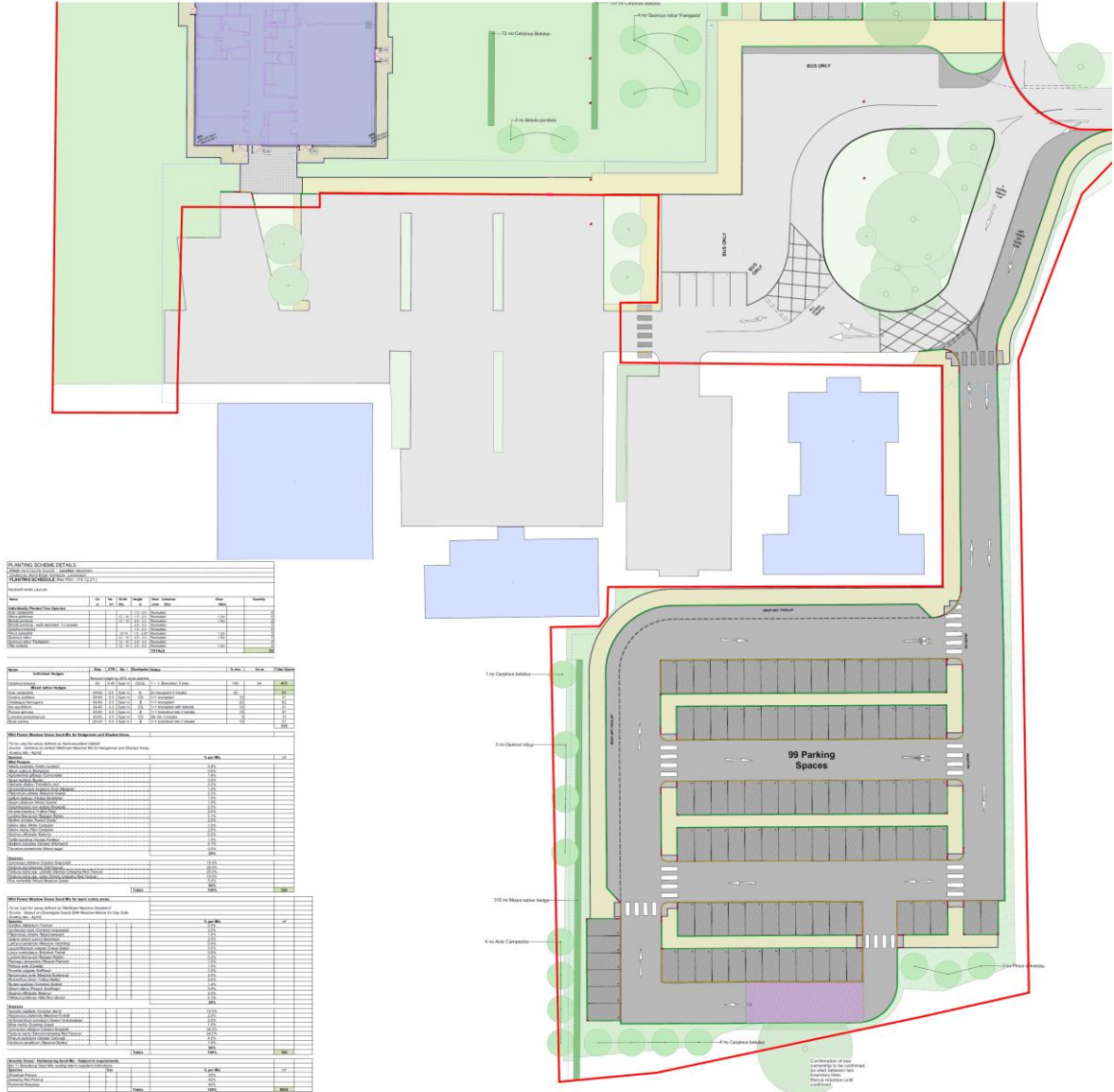
Site Location Plan



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Site Location Plan (southern part of the site)



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Proposed Ground Floor Plan



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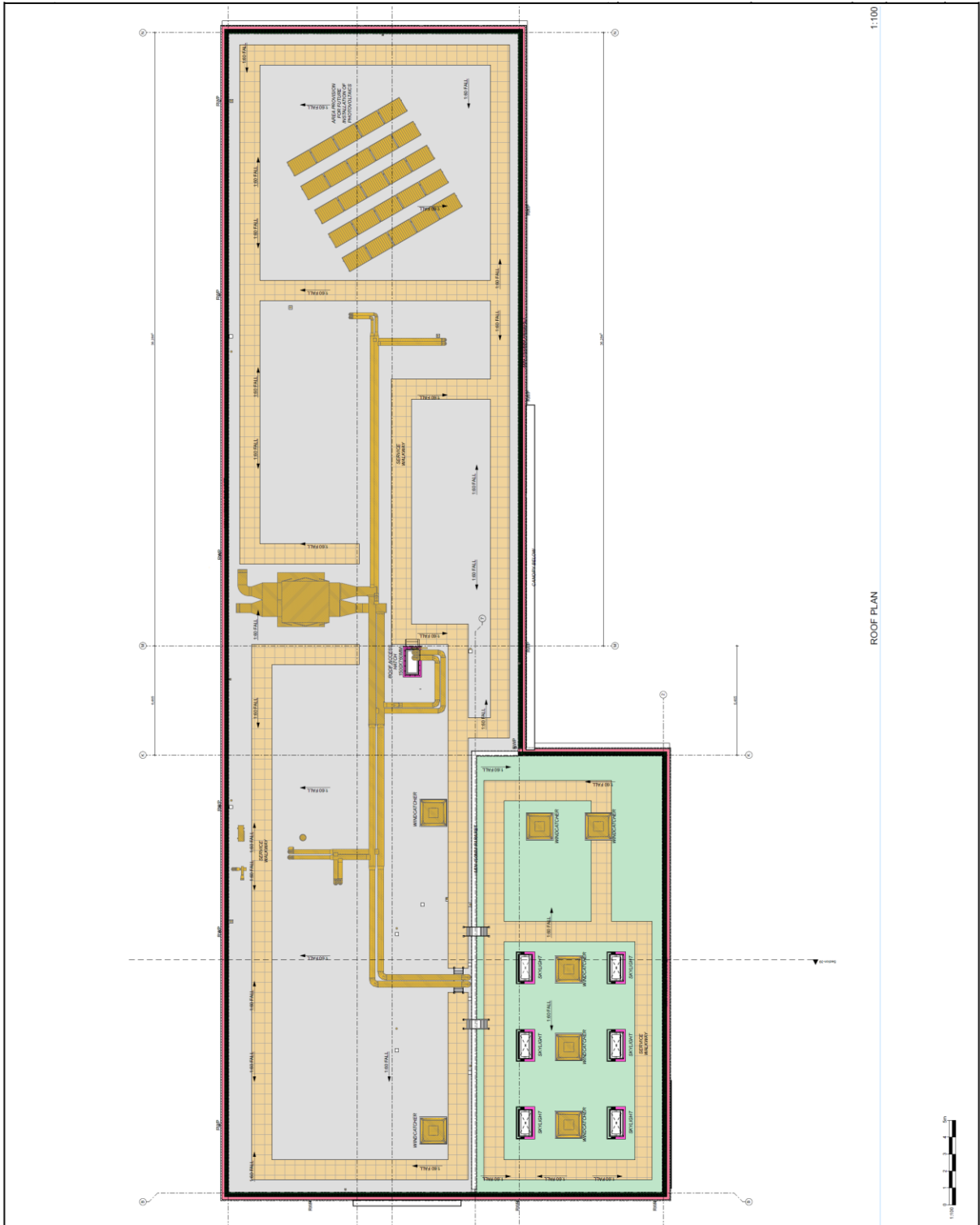
Proposed First Floor Plan



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Proposed Roof Plan



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Proposed Elevations



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Site Aerial View



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Birds Eye View



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Site Access View



View From Existing School Reception



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Front Elevation View



Rear Elevation View



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New car park with pupil drop-off/pick up area (looking northwards)



New car park with pupil drop-off/pick up area (looking southwards)



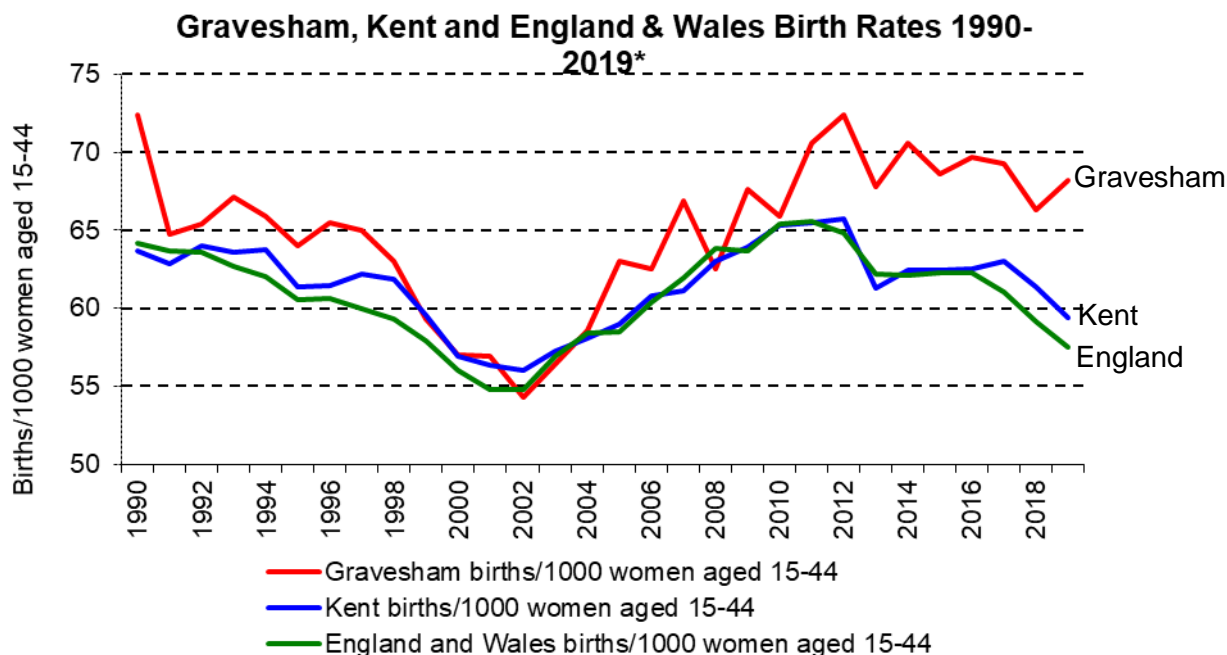
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2. The original school site was laid out in a campus style with two and three storey blocks. The majority of the school was built in the 1970s using a CLASP (Consortium of Local Authorities Special Programme) building system (method of designing and assembling prefabricated buildings for use in the public sector). Planning permission was granted in 2016 to expand the school which involved the demolition of the existing 1970's school, and the erection a new 3-storey building completed in 2018 on an area to the north of the old school buildings.
3. As identified on the Gravesham Local Plan Policies Map (2014) the entire school site sits within the Metropolitan Green Belt, with the residential areas to the east and south of the site designated as 'rural settlements inset from green belt'. None of the trees within the application site are covered by a Tree Preservation Order (TPO) and according to the Environment Agency online flood mapping system, the application site is within Flood Zone 1 which corresponds to a low risk of flooding.

Background

4. Meopham School is a popular school with an Ofsted rating of 'Outstanding' and the School's proposal to increase the number of secondary places at the school is therefore, in line with the expectation of expanding a popular and successful school. The school was expanded in 2018 to provide for up to 798 pupils, comprising of 700 in Years 7-11 (PAN of 140 per year) and 98 in the sixth form. This expansion proposes to increase the Published Admission Number (PAN) by 60 Year 7 students per year. The School joined the Swale Academies Trust as an Academy on 1 February 2013. This planning application has been submitted by Kent County Council, as the Local Education Authority, as a Basic Needs Project.
5. Kent County Council (KCC) as the Local Education Authority has a statutory duty to ensure sufficient school places are available. The County Council's Commissioning Plan for Education Provision in Kent 2019-2023 is a five-year rolling plan which is updated annually. It sets out the future plans as Strategic Commissioner of Education Provision across all types and phases of education in Kent. Below is a graph showing the birth rates in Gravesham, Kent, and England.

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6. Over the past ten years, the number of children born in Gravesham has continued to be higher than both Kent and national averages. It is anticipated that there would be significant pressure for additional Year 7 places in the Gravesend and Longfield Non-Selective Planning Group. Previous projections indicated that additional capacity would be needed for 2020/21, continuing for later years. The latest 2022-2026 Kent Commissioning Plan (KCP) shows the population continuing to be at a level significantly higher than the National or County average. These population increases have required the expansion of nearby primary schools, and the increased numbers arising from the primary expansions are now impacting on the secondary school capacity. Additionally, medium scale housing development and these high birth rates are bringing new families to the area and requiring enhancements to the infrastructure in order to meet the future needs of the borough and its residents.

7. The 2019–2024 Kent Commissioning Plan (KCP) provided the data that indicated a need to propose an expansion. The 2019-2024 KCP provided forecasts that indicated a sustained increase in the demand for secondary school capacity. Furthermore, this increased demand is showing no signs of reducing over the forecast period. KCC forecasts from the 2019-2024 KCP indicated a growing demand for Year 7 places in Gravesend from the start of the 2019-20 academic year. The Gravesend and Longfield Non-Selective Planning Group was forecast to have a deficit of 102 Year 7 places (3.5FE) from 2021-22 that increases to a deficit of 203 places (7FE) by 2023/24 reducing slightly to 175 (6FE) for 2025/26. The conclusion from two years ago identified a need for an expansion at Meopham School.

8. The latest iteration of the Kent Commissioning Plan (2022-26) reinforces the projections from the 2019 – 2024 KCP, and Gravesham continues to show a forecast deficit in year 7 places, even if Meopham were to continue to admit the increased number of 200 pupils per year group. These tables below indicate that there would a deficit in Year 7 places for the next intake and that continues for the forecastable future. There is a small amount of capacity for higher year groups, but that small surplus becomes a deficit by the September 2025 intake.

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Planning Group	2020-21 capacity	2021-22 (F)	2022-23 (F)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 capacity (F)	2027-28 capacity (F)	2027-28 capacity
Gravesham and Longfield Non-Selective	1,309	3	38	-75	-27	-66	-62	-37	1,324

Table showing **Year 7** surplus/deficit if no further action is taken.

Planning Group	2020-21 capacity	2021-22 (F)	2022-23 (F)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 capacity (F)	2027-28 capacity (F)	2027-28 capacity
Gravesham and Longfield Non-Selective	6,281	167	186	79	46	-68	-132	-207	6,620

Table showing **Years 7 to 11** surplus/deficit if no further action is taken.

9. The Gravesham Borough Council Local Plan (adopted September 2014) states an intention to build 6,170 dwellings between 2011 to 2028. About 20% of the Ebbsfleet Development Corporation area is sited in Gravesham. During the 5-year period 2013-18 a total of 1,023 houses were completed with an average of 205 per annum. The deficit of places would be further exacerbated by limited options for alternative expansions within the Gravesham Borough area unless additional capacity can be created. This planning application has been submitted following an identified need to secure additional permanent secondary school places within the Gravesham Borough area.
10. There are seven secondary schools in the Gravesham and Longfield Non-Selective Planning Group. These are Longfield Academy, Meopham School, Northfleet School for Girls, Northfleet Technology College, Saint George’s CE School (Gravesend), St John’s Catholic Comprehensive School, and Thamesview School. Of these, St John’s Catholic Comprehensive, Thamesview School, Saint George’s CE School and Northfleet School for Girls have either been expanded or are the subject of a proposal to expand. Northfleet Technology College is under feasibility for an expansion and Longfield School has been offering additional school places under a local arrangement for several years. KCC as the Local Education Authority have confirmed that Meopham School is the only remaining candidate for expansion.
11. As mentioned above, the School expanded in 2018 when the new 3-storey building was constructed to provide accommodation for up to 798 pupils, comprising of 700 in Years 7 to 11 (PAN of 140 per year) and 98 in the sixth form (please note that the figure of 98 sixth formers was the maximum capacity that the school could accommodate – in reality there was actually less sixth formers as the table below shows). However, for the past 4 years the school has taken an additional 30 pupils each year in Year 7, bringing the PAN up to 170 pupils a year, at the request of Kent County Council as Local Education Authority. From September 2021/2022 the School started to take in an additional 30 pupils in Year 7 and thus starting the full 2 FE expansion of 200 pupils in Year 7. Due to a shortage of space within the 3-storey building for these additional pupils, they have been accommodated in temporary buildings on the site in five modular buildings. To accommodate the additional pupils for the September 2022/23 intake, two further

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modular buildings are proposed to be erected on this school site under Permitted Development legislation. Below is a table illustrating the progressive expansion of admission numbers from 2018 to present day and then a projection to full capacity which would be reached by 2025/26.

	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026
Yr7	170	170	170	200	200	200	200	200
Yr8	141	162	170	170	200	200	200	200
Yr9	147	159	162	170	170	200	200	200
Yr10	140	140	161	170	170	170	200	200
Yr11	140	140	140	170	170	170	170	200
6th Form	60	60	60	66	75	90	130	156
TOTAL	798	831	863	946	985	1030	1100	1156
<i>Staff</i>	<i>87</i>	<i>93</i>	<i>101</i>	<i>108</i>	<i>120</i>	<i>135</i>	<i>145</i>	<i>150</i>

Table illustrating the progressive expansion of admission numbers from 2018 to present day, and then a projection to full capacity by 2025-2026.

12. The proposed expansion of Meopham School would result in the Published Admission Number (PAN) increasing from 140 pupil to 200 pupils in Years 7 to 11 and a total of 1156 pupils at the school, with 1000 students in Years 7-11 and 156 students in the sixth form. As a result of this proposed 2FE expansion, the number of staff is also proposed to increase from 108 to 150 members of staff.
13. Located on the Meopham School site is also a medical centre, a library, a nursery and a fitness and tennis centre, which all use the same one access located off Wrotham Road (A227). Parking on the site is shared by all the various land users. The majority of the existing car park is not formally marked out and based on historic satellite imagery of the car park being occupied, approximately 175 cars are able to park on this site, although in this format the applicant has confirmed that in this format the bays and aisle widths would be substandard. The medical centre has its own 21 space parking area for staff and patients and the school has 5 disabled bays and 1 headteacher bay located adjacent to the school entrance, specifically for their use. School staff are therefore able to utilise any of these shared bays and signage is provided at the entrance to the site, directing vehicles to the parking areas.

Recent Planning History

14. The most relevant recent site planning history is listed below;

GR/21/316	Proposed 2 form of entry expansion, involving the erection of a new freestanding 2-storey school building, together with associated parking and landscaping works. Withdrawn.
GR/19/1121	Installation of a temporary single storey portacabin classroom building to be hired for a period of 3 years. Temporary planning permission granted with conditions.
GR/15/1233	Demolition of existing school buildings and replacement with a 3-storey block together with landscaping and associated ancillary works.

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This planning application was dealt by Gravesham Borough Council because the school is now an Academy. Granted with conditions.

Amended planning application following the withdrawn application

15. A planning application was submitted in 2021, registered under planning reference GR/21/316 (KCC/GR/0041/2021) for the proposed 2 form of entry expansion, involving the erection of a new freestanding 2-storey school building, together with associated parking and landscaping works. This application was withdrawn prior to its determination to enable the applicant to review options to further improve the access and parking arrangements to help reduce the highways impact on Wrotham Road. The amended proposals, which now includes a dedicated pupil drop off/pick up area and car park is the subject of this application.

Proposal

16. This planning application has been submitted by Kent County Council Infrastructure Division as a Basic Needs Project and proposes to provide the accommodation required for the expanding school roll at Meopham School. The proposal is for a 2 Form of Entry (FE) expansion of the school and its sixth form provision and would result in a total of 1,156 pupils and 150 members of staff. The proposed development comprises of the following key components:
- The construction of a freestanding 2-storey teaching block with a gross internal floor area (GIFA) of 2,360m². The building would provide additional dedicated teaching and learning spaces. It would include general and specialised teaching spaces and supporting facilities as well as a music classroom, drama and dance studio and a main hall;
 - The provision of additional 42 car parking spaces for staff. A school only car park is proposed to be located near the main school building and would include 39 parking spaces for staff and include 4 accessible parking spaces and 4 electric vehicle charging bays with a further 8 spaces with passive charging provision to allow future conversion;
 - The provision of another 99-space car park and pupil drop off/pick up area. This car park would include 18 parking spaces for staff which would comprise of the 3 new parking bays and 15 bays relocated from the location of the proposed bus only zone. The remainder of this proposed car park would provide 81 parking spaces for parents and another 14 vehicles would be able to park within the drop off/pick up zone, thus giving a total of 95 parent parking spaces;
 - The internal access road to be widened to two lanes to separate the traffic using the new 99 space car park and pupil drop off/pick up facility, and the traffic accessing the other facilities on this site;
 - The creation of a bus only zone to separate buses from other traffic and the relocation of the existing car parking spaces into the new 99 space car park;
 - Signage and road marking improvements;
 - Provision of 20 cycle parking spaces,
 - An array of PV panels is proposed in the roof, and
 - Landscaping works.
17. The school expansion is proposed to be delivered via a new freestanding 2 storey education building. The proposed new building is planned to be located in an area which accommodated the original school buildings referred to in paragraph 2 above which is now a grassed area and is used as an informal break out area. This part of the

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school site has never been used for sport or recreation purposes. The remainder of this grassed area is intended to remain as social space for the students.

18. The two-storey building would be orientated north east to south west, with the classrooms/teaching areas accessed via a central corridor on each floor. A double height activity hall is proposed to the south east of the building, facing towards the main entrance to the school site. Access points to the building would be located at both ends of the building, and centrally adjacent to the activity hall, with staircases located at either end. The building would measure 69 metres in length by 26 metres in width, with a height of 10 metres (height from external ground level to top of parapet). The material palette of the proposed 2-storey building has been selected to blend in with the existing 3-storey school building and to inject a fresh and modern look to enhance the appearance of the site. The proposed material palette would be comprised of a light colour brickwork at lower level to emphasise the link with the ground and a mix of grey colour cladding for the upper levels which is proposed to re-create the horizontal views of the surrounding landscape. An array of Photovoltaic (PV) panels are proposed to be installed in the flat roof in the area highlighted on the proposed roof plan drawing.
19. The form, scale and massing of the proposed development has been designed to fit in with the existing buildings on this site. It is intended that the new 2-storey teaching building would have a secondary importance visually and functionally in comparison to the existing main 3-storey school building and would help the user understand the use of the two buildings. The topography of the site would also help to minimise the impact of the new teaching block on the existing environment as the site steps down from east to west. Therefore, the proposed building would be on a lower position from the main access to the site.
20. The applicant has confirmed that it is anticipated that some of the spaces within the new school building would be made available for community use out of school hours, but no details have been confirmed at this stage.
21. Access to the site would remain unchanged and be from the A227 Wrotham Road. The current access is a priority junction with a single lane entering and a single lane exiting the site and is shared by all the different land users on this site. Apart from the School there is a medical centre, a library, a nursery and a tennis and fitness centre, all accessing and exiting via this only access.
22. There are changes proposed to the internal access arrangements to provide additional on-site pupil drop-off/pick-up facilities (discussed below) to accommodate the proposed increase in pupils and which is proposed to improve the flow of traffic within the site and to reduce the potential for traffic backing onto Wrotham Road as occurs currently. These works are also proposed to improve access to the other land uses on this site during peak times. The internal road layout would be upgraded to improve the circulation of traffic within the site and to separate the school drop-off/pick-up traffic from the traffic associated with the other land users on this site. All on site pick up/drop off activity is anticipated to be within the confines of the new facility.
23. Upon entering the site, the carriageway would be split into two lanes and all traffic would be required to circulate around the internal 'roundabout' to exit the site. The left lane would lead to the new school drop-off/pick-up car park and the right lane would be used by all other traffic entering the site (including buses). As a consequence, traffic would no longer be able to turn immediately right upon entering the site to access the tennis and fitness centre, and this is proposed to reduce conflict near the site access and reduce the likelihood of traffic backing up as vehicles wait to turn within the site. Exiting the car

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park would be via the same access road and back onto the internal roundabout. Traffic exiting the car park would be required to give way to traffic entering the site.

24. To accommodate the increase in staff, an additional 42 parking spaces (1 per new staff member), is proposed to be provided for staff. The parking currently on this site is shared between all users on the site. However, the new 42 space parking area provided would be for use by the school staff only.
25. A total of 39 car parking spaces are proposed to be provided at the front of the existing 3-storey school building. 32 of the proposed parking spaces would be located adjacent and connected to the existing 6 disabled bays near the main school building. An access to the additional parking area would be provided onto the internal access road to the tennis and fitness centre. 7 parking bays would be provided directly off the access road to the tennis and fitness centre and the remaining 3 parking bays would be provided in the new drop-off/pick-up car park, alongside the relocated existing staff parking spaces that need to be relocated as a result of a proposed bus only zone within the site. Within this car park it is proposed to provide 4 electric vehicle charging bays with a further 8 spaces with passive charging provision to allow future conversion.
26. The School has confirmed that sixth formers do not drive onto the school site and on this basis, it is not proposed to provide any parking on this site for sixth formers.
27. Currently during the morning drop-off, pupils are predominantly dropped off within the site on the internal roundabout and during the afternoon collection, pupils are generally collected off-site. To accommodate the additional pupils as a result of the proposed expansion, a new drop-off/pick up car park is proposed which would be provided on land to the south of the medical centre. Entry to the car park would be via a short access road along the eastern boundary of the medical centre. All on site pick up/drop off activity would be within the confines of the new facility. The aisle widths would be 6m wide and allow for two vehicles to pass so as to improve circulation by allowing vehicles to use the “fast track” lane or pass by to access the car parking or exit the site.
28. The new car park would have a total of 99 parking spaces, of which 18 parking spaces would be for staff and would comprise of 3 parking spaces for new members of staff and the 15 parking spaces relocated from the location of the proposed bus only zone. In total it is proposed that there would be 95 parking spaces for parents to park, which includes 81 parking spaces and an additional 14 spaces within the pupils drop off/pick up area. Additional footways and zebra crossings would be provided within the new car park to allow pupils to safely navigate to parking bays. Additionally, a 2.5m wide footway would be provided on the new access road to the east of the medical centre, connecting to the existing footway to the north of the medical centre and another zebra crossing would be provided at the entrance to the medical centre, and across the car park aisle leading to the library and nursery. It is also intended to provide lighting within the new car park.
29. It is also anticipated that the new drop-off/ pick up car park would also be able to accommodate the increase in demand from visitors to the site during the day. The new parking area would also provide a parking area for visitors during special events at the school such as parents evenings.
30. The planning application also proposes to provide, in the first instance, 20 cycle parking spaces with an area safeguarded on the site to allow for the future addition of further cycling parking, if required. However, given that few children currently cycle to school and as the school is not within cycling distance for many students due to its rural setting,

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it has been proposed that the School would monitor the number of pupils that might cycle to the school through the School Travel Plan and if the demand for cycle spaces does increase beyond the initial 20 spaces, then further cycle parking would be added.

31. As part of the landscaping works it is proposed to retain all Category A (trees of high quality with an estimated remaining life expectancy of at least 40 years) on this site. However, there is a need to remove 5no. Category B trees, 7no. Category C trees, and 1no. Category U tree. To mitigate the loss of trees and maintain levels of amenity and biodiversity, it is proposed to plant new trees to the south and west of the proposed new pupil drop off/pick up car park area. Accordingly, there should be no net loss of trees and landscaping features across the site.

Planning Policy Context

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

- (i) **National Planning Policy Framework (NPPF) July 2021** and the **National Planning Policy Guidance** (first published in 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 would 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 approach decisions in a positive and creative way, 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;

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.

- Taking a positive approach to applications that make more effective use of sites that provide community services such as schools, provided this maintains or improves the quality of service provision and access to open space and making decisions that promote an effective use of land while safeguarding and improving the environment and ensuring safe and healthy living conditions;

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- Ensure that planning policies and decisions provide the social, recreational and cultural facilities and services the community needs, by planning positively for the provision and use of shared spaces and community facilities such as sports venues or open spaces to enhance the sustainability of communities and residential environments;
- Conserving and enhancing the natural environment;
- Planning policies and decisions should prevent unacceptable risks from pollution and land instability and should ensure that new development is appropriate for its location;

In addition, Paragraph 95 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 would widen choice in education. They should give great weight 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. In particular, the Policy states that the Government seeks to enable new schools to open, good schools to expand and all schools to adapt and improve their facilities. This would allow for more provision and greater diversity of provision in the state funded school sector, to meet both demographic needs, provide increased choice and create higher standards.

(iii) **Gravesham Local Plan Core Strategy 2014 – Adopted September 2014- Policies:**

Policy CS01 Sustainable Development. States that planning applications which accord with the policies in the development plan would be approved without delay unless material considerations indicate otherwise.

Policy CS10 Physical and Social Infrastructure. States that support would be given to proposals and activities that protect, retain, or enhance existing physical and social infrastructure, or lead to the provision of additional infrastructure that improves community well-being.

Policy CS11 Transport. States that new development should mitigate their impact on the highway and public transport networks as required. Transport assessment and travel plans should be provided and implemented to ensure travel choice and sustainable opportunities for travel. Sufficient parking in the new development would be provided in accordance with adopted parking standards.

Policy CS18 Natural Environment. States that proposals must not increase the risk of flooding on or off site and should seek to minimise the impact of drainage from new development on waste water systems. Proposals should seek to reduce the overall carbon footprint of the Borough.

Policy CS19 Development and Design Principles. Sets out a number of design principles that development must satisfy to ensure high quality design. This includes the need to respect the scale, massing, height, and

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materials of local development. New development should include details of appropriate hard and soft landscaping. Car parking should be well related to the development it serves. New development should protect and, where opportunities arise, enhance biodiversity.

Strategic Objective S08 Green Belt. Preserve the openness of the Green Belt, maintain its national and local planning purposes and protect it from inappropriate development.

(iv) Gravesham Local Plan First Review Saved Policies - 1994:

It is considered that none of the saved policies are of relevance to this proposal. All of the policies concerning the Green Belt have been deleted and superseded by associated guidance in the NPPF.

Consultations

33. **Gravesham Borough Council:** Raises no objection to the planning application.

Meopham Parish Council: Raises objection to the planning application and has the following comments:

“Meopham Parish Council recognises that the applicant has taken note of the serious concerns raised in respect of the original application (this application was withdrawn following consultation) regarding on-site parking and the current application makes improved provision for such parking. However, Meopham Parish Council has resolved to object to the current proposal on the grounds that it does nothing to address the concerns expressed by it in respect of the original application relating to the capacity of the A227 to accommodate the additional traffic which the expansion of the school would generate.

The Council notes that 60 additional children would be going to the school in September 2022 whether this application is approved or not, to add to the extra 120 brought in in the last two years and thus there would in any event be a consequential increase in traffic flows at critical times. The Council is concerned that the planned admission limit for the school has been increased without proper consideration of the impact of the increase on the local infrastructure and therefore the local community.

It remains the position of the Parish Council that:

- (i) That the main road running through the village and serving the school is not able to accommodate the extra traffic the development will generate. The Parish Council is very aware of the queues that build up in both directions on the A227 at the beginning and end of the school day with journeys taking significantly longer as a result.
- (ii) The further transport study attached to the application fails to address the issues raised in the transport study commissioned by the Parish Council and submitted with its objection to the original application.
- (ii) The extra traffic will add to the difficulties at the junction of the A227 and the access road into the site. The provision for additional parking on site will in fact exacerbate the problem if more cars are seeking to enter/exit the site at the start and end of the school day. Even with the improved parking provision there will still only be one entry/exit point. It is difficult for traffic to enter the main road currently. The additional traffic generated by the proposal will exacerbate the situation with

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- resultant heightened road safety issues. It is equally difficult for traffic turning right into the site to access the medical centre or other facilities there.
- (iv) The development will adversely affect the amenity of local residents because of the additional off-site parking which will still be generated. There is already excessive on-street parking at both the beginning and end of the school day and the development will add significantly to it and may cause additional issues, including road safety issues in the residential roads in close proximity to the site. An illustration of the loss of amenity already endured by local residents is the delay to funerals at St. Johns Church on account of traffic queues generated at school leaving times.
 - (v) The development is inappropriate for the rural locality. The additional car parking makes the development even less sympathetic with the rural surroundings. It is not required to meet the needs of the population of Meopham and other neighbouring rural parishes as evidenced by the number of pupils already travelling to the school from the urban areas to the north and west of the village.
 - (vi) Despite the fact that our concerns have always focussed on the inadequacy of the A227 to support extra traffic, the new application is deficient in that it does not suggest any additional traffic initiatives including dedicated bus/minibus routes to reduce the need for car journeys. In fact the Parish Council doubts that even if such bus journeys were added the impact on traffic flows would be significant as parents may still choose to transport their children to and from school”.

The Parish Council had previously commissioned an independent Traffic Consultant to appraise the planning application that was withdrawn. The document was entitled ‘Highways Technical Appraisal in Respect of Application to KCC Planning Committee – Reference KCC/GR/0041/2021’. Upon receiving of the above-mentioned comments to the current application, the Parish Council refers (in point (ii) above) to this Technical Appraisal, and so the Parish Council was asked to re-submit this document as part of their response. The Technical Appraisal document was forwarded to the applicant to be considered alongside the Parish Council’s comments above. Please note that the Technical Appraisal does not consider the proposed mitigation measures that have submitted as part of this current planning application.

Kent Highways: Initially raised a holding objection to the planning application.

The first holding objection was received from Kent Highways on 1 March 2022, requested additional information pending the submission of mitigating measures to reduce the number of private cars travelling to the site; consultation with the Gravesham Borough Council Parking Manager to possibly introduce parking restrictions on the A227 Wrotham Road and the residential roads on the eastern side of Wrotham Road to reduce the excessive and inappropriate parking in those roads; consultation with the KCC Public Transport Team to consider any additional bus services required to the school and to decrease the percentage of pupils and staff travelling to and from the school by private car and to produce a more robust School Travel Plan supported by the school and recorded on the Jambusters web site to increase the sustainable travel modes for travel to and from the school.

A second holding objection was received from Kent Highways on 23 May 2022, requesting further consultations to take place with KCC Public Transport as the requested improvements to bus services had not been fully addressed and for further consultation to take place with the School to produce a fully robust School Travel Plan. The requested consultation to take place with Gravesham Borough Council Parking Manager had been satisfactorily addressed and is set out in the comments below:

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“Discussions between the applicant’s Transport Consultant and the GBC Parking Manager suggested that he [*GBC Parking Manager*] considered that there were already adequate parking restrictions on Wrotham Road and did not consider that any on-street parking restrictions on the residential roads were appropriate. He stated that any highway safety related restrictions were the responsibility of the Highway Authority and any obstructions or inappropriate parking were the responsibility of the police.

It was stated in the applicant’s Transport Consultant’s response that the school was committed to patrolling nearby roads by staff to deter inappropriate parking by parents e.g. blocking driveways but this was of concern in terms of safety [*to Kent Highways*] and not considered appropriate. It also stated that the school would promote a publicity campaign to encourage parents to use the new drop-off / pick-up parking area which is welcome.

Kent Highways subsequently contacted the GBC Parking Manager regarding the response who agreed that the usage of the new pick-up/drop off area was an unknown factor but also agreed that school staff should not be involved in traffic / parking issues off-site. He confirmed that the school should regularly liaise with him regarding any known problems but should contact the police for any cases of obstruction [*this has been included in the Action Plan of the School Travel Plan*]. He did not consider that it was appropriate for any additional financial contribution to improve coverage by Enforcement Officers but the later would be aware of the local concerns and try to talk to drivers.

In conclusion, Kent Highways consider that the applicant has carried out the discussions with GBC Parking Manager as requested and, other than requesting that the school communicates the impact on local residents of inappropriate parking and liaising fully with the Parking Manager, I consider that my concerns on this issue have been fully investigated and I accept there is nothing further to be considered”.

Following receipt of all the requested additional information (listed above), **Kent Highways** raise **no objection**, subject to the imposition of a number of planning conditions (listed below) and a financial contribution towards public transport capacity improvements and monitoring of the School Travel Plan. The following comments have been made:

“I refer to my previous consultation responses dated 1st March 2022 and 23rd May 2022 in which I requested a holding objection whilst the bus service improvements and School Travel Plan details were finalised. In the latter document I agreed that my objection in respect of the parking restrictions in the local roads be withdrawn after discussions took place with Gravesham Borough Council’s Parking Manager.

Discussions have since taken place with both the applicant and the KCC Public Transport Team resulting in a Memorandum of Understanding (MOU) between the County Council’s Children, Young People and Education (CYPE) and Highways Transportation & Waste (HTW) Directorates which provides financial resources to enable additional bus services to be provided should additional demand be forthcoming in the next 5 years. This is closely linked with the School Travel Plan (STP) which expects to increase the bus usage during this period. The MoU also provides for a £5000 towards monitoring of the STP and ensuring that the targets to reduce travel by the private car are being met and adjustments made where necessary.

A draft version of the STP (Revision 13) has been submitted that is found acceptable to both the Active Travel Interventions Team (who monitor School Travel Surveys through the Jambusters web site) and KCC Highways. It is a requirement that a travel survey of

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both pupils and staff is made annually and any adjustments, with possible additional mitigating measures, to that STP are submitted for approval should the targets not be met. I find this acceptable.

I therefore am able to withdraw my previous holding objection on the basis that my above two concerns have been satisfactorily addressed. It is my opinion that the on-site layout and parking improvements, supported by the other mitigating measures referred to above will combine to ensure that the proposed increase in pupil and staff numbers as a result of the expansion of the school will not result in highway safety or congestion issues. In conclusion, therefore, I raise no objection to the application on highway grounds provided the following conditions are applied to any consent granted.

1. A Construction Environmental Management Plan shall be submitted and approved prior to any works commencing on the site. The CEMP shall include, but not exclusively, the following issues:
 - (a) Routing of construction and delivery vehicles to / from site
 - (b) Parking and turning areas for construction and delivery vehicles and site personnel
 - (c) Timing of deliveries
 - (d) Provision of wheel washing facilities
 - (e) Temporary traffic management / signage.
2. A minimum of 10% of the new staff parking spaces (excluding the drop-off / pick-up spaces) shall be provided with Electric Vehicle charging points. In addition, a further 20% of the new spaces (excluding the drop-off/pick-up spaces) shall be provided with passive service i.e. ducting/cabling only). Details and location of these shall be submitted and approved by the LPA prior to first occupation of the new buildings.
3. Travel Surveys of both staff and pupils to be undertaken annually in accordance with the submitted School Travel Plan and compared to the targets given. Any further mitigating measures, if the targets are not met, to be submitted to and approved by the LPA. Any identified shortfall in the bus services to be appropriately addressed in accordance with the submitted MoU regarding provision of bus services.
4. The Car Park Management Plan is to be monitored and reviewed annually as part of the annual School Travel Plan review.
5. The revised internal road layout and bus stopping / turning area to be completed prior to first occupation.
6. The proposed drop-off / pick-up area as shown on the submitted plans to be completed and fully operational prior to first occupation of the new buildings.
7. The submitted Car Park Management Plan to be reviewed annually in co-ordination with other on-site operators and any amendments to be submitted and approved by the County Planning Authority.
8. The car parking numbers as shown on the submitted drawings shall be provided prior to first occupation and shall thereafter be maintained for that sole purpose.
9. A minimum of 20 secure and weatherproof cycle parking spaces shall be provided prior to first occupation in accordance with details to be submitted to and

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approved by the LPA and shall be maintained thereafter, and with an area safeguarded on the site to allow for the future addition of further cycling parking, if required. The number of cycle parking spaces shall be reviewed annually alongside the School Travel Plan and the number of spaces increased if necessary.

An Informative is recommended regarding obtaining any necessary highway approvals”.

In addition, the Highway Authority requires a financial contribution towards public transport capacity improvements and monitoring of the School Travel Plan.

School Travel Planner: Raises no objection to the School Travel Plan (Draft 13).

Archaeology: Raises no objection subject to the imposition of a condition requiring a programme of archaeological works to be undertaken in accordance with the submitted documentation.

KCC’s Biodiversity Officer: Raises no objection subject to the imposition of conditions including a pre-commencement condition, relating to precautionary mitigation measures for dormouse, badgers and breeding birds; implementation of habitat creation and reptile mitigation works within the Additional Ecological Assessment; completion of reptile mitigation works as detailed in the Proposed Enhancement and Mitigation Plan within the Additional Ecological Assessment; a signed Impact Assessment and Conservation Payment Certificate signed by Natural England; the Construction Management Plan to include a detailed plan demonstrating the location of the heras fencing to protect the reptile habitat, and any lighting condition requires the lighting plan to follow the recommendations within the Bats and Artificial Lighting in the UK document

Kent County Council’s Flood Risk Engineer: Raises no objection to the planning application subject to the imposition of conditions including a pre-commencement condition relating to contamination and no infiltration of the surface water drainage.

Environment Agency: Raises no objection to the planning application subject to the imposition of two conditions relating to contamination and infiltration of surface water drainage.

Sport England: Raises objection to the planning application and has the following comments:

“It is understood that the proposal prejudices the use, or leads to the loss of use, of land being used as a playing field or has been used as a playing field in the last five years, as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). The consultation with Sport England is therefore a statutory requirement.

Sport England has considered the application in light of the National Planning Policy Framework particularly Para 99) and Sport England’s Playing Fields Policy, which is presented within its ‘Playing Fields Policy and Guidance Document’:

Sport England’s policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of, all/part of a playing field, unless one or more of the five exceptions stated in its policy apply.

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Sport England Policy Exceptions

E1

A robust and up to date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport.

E2

The proposed development is for ancillary facilities supporting the principal use of the site as a playing field and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.

E3

The proposed development affects only land incapable of forming part of a playing pitch and does not:

- reduce the size of any playing pitch;
- result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);
- reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;
- result in the loss of other sporting provision or ancillary facilities on the site; or
- prejudice the use of any remaining areas of playing field on the site.

E4

The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:

- of equivalent or better quality, and
- of equivalent or greater quantity, and
- in a suitable location, and
- subject to equivalent or better accessibility and management arrangements.

E5

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

Assessment against Sport England Policy/NPPF

The proposal is for an expansion of the school including the development of a new staff car park on part of the existing playing field. The current proposal includes a new freestanding building that was previously the subject of withdrawn application reference GR/0041/2021 to which Sport England had no objection since it had minimal adverse impact on the extent and capacity of the playing field. It is understood that that application was withdrawn following objections from local residents regarding the potential of the new building to cause an increase in traffic visiting the school. The current application is an attempt to resolve those concerns by providing additional parking on the school site.

The Development Management Procedure Order defines a playing field as ‘the whole of the site which encompasses at least one playing pitch’. Sport England considers the area that would be affected by the additional parking to constitute part of the larger playing field of the school and therefore, to be part of the current playing field. Additionally, this part of the playing field has been used for playing pitches in its own

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right within the previous five years (see Google image below paragraph 82 which was taken in May 2018).

There is no proposal to replace the area of playing field that would be lost and the proposal does not meet any other exception to our policy.

Conclusion

In light of the above, Sport England objects to the application because it is not considered to accord with any of the exceptions to Sport England's Playing Fields Policy or with Paragraph 99 of the NPPF.

Should the local planning authority be minded to grant planning permission for the proposal, contrary to Sport England's objection then in accordance with The Town and Country Planning (Consultation) (England) Direction 2021, the application should be referred to the Secretary of State, via the Planning Casework Unit".

Local Member

34. The local County Member Mr Bryan Sweetland was notified of the application on 3 February 2022. Mr Sweetland has made the following comments:

"The extra traffic will add to the difficulties at the junction of the A227 and the access road into the site. The provision for additional parking on site will in fact exacerbate the problem if more cars are seeking to enter/exit the site at the start and end of the school day. Even with the improved parking provision there will still only be one entry/exit point. It is difficult for traffic to enter the main road currently. The additional traffic generated by the proposal will exacerbate the situation with resultant heightened road safety issues. It is equally difficult for traffic turning right into the site to access the medical centre or other facilities there.

The development will adversely affect the amenity of local residents because of the additional off-site parking which will still be generated. There is already excessive on-street parking at both the beginning and end of the school day and the development will add significantly to it and may cause additional issues, including road safety issues in the residential roads in close proximity to the site".

Publicity

35. This application was advertised by the posting of a total of 10 site notices in the vicinity of the school entrance along Wrotham Road, between The Street and Meopham Village Hall. A press notice was published in the local newspaper on 10 February 2022.

Representations on the planning application

36. A total of 21 representations have been received from local residents objecting to the application. Of these 21 representations, a total of 10 representations received were the same letter sent by 10 different individuals. The main points of objection are summarised below:

Congestion and Traffic Generation

- The additional vehicle movements that this application would generate would amount to more congestion, cause significant delays, inconvenience to local residents and increase the risk of accidents.

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- The volume of traffic on the A227 is already at unacceptably high levels due to it being used as a rat-run to avoid congestion on major roads in the surrounding area, including heavy goods vehicles which constantly have to cross over into the oncoming lane as they are too wide and totally unsuitable to be driving through Meopham village. This level of traffic is only going to increase in the near future due to housing development etc.
- Meopham Community Academy, Playpen Pre-School and Helen Allison School are also situated nearby at the junction of Longfield Road and the A227 which is adjacent to the shops at the Parade. This area also becomes extremely busy and congested at school start and finish times which results in unsafe parking practices and traffic jams.
- The single lane access and exit road into the site is also used by Meopham Medical Centre, Busy Bees Nursery, Meopham Fitness Centre, and Meopham Library, all of which create an additional flow of traffic in and out of the school site onto the Wrotham Road junction.
- Allowances have been made for additional parking and drop off points but the fact is there is one entrance to the site which effectively creates a bottle neck. The additional on-site car parking could make the situation worse.
- Vehicles queuing to enter and leave the site would cause congestion on both southbound and northbound sides of the A227. This would result in an obscured view of oncoming traffic, particularly by HGVs, buses, and other large vehicles, creating the need for cars leaving the school to edge out posing a hazard to oncoming traffic, particularly to motorbikes overtaking queuing vehicles, as well as an increased risk to cyclists and pedestrians.
- The entrance is gridlocked twice a day and a separate entrance and exit are needed with tidal traffic control rather than the frankly lame plan currently suggested.

Parking on local roads

- Parents currently park in local roads to pick up and drop off pupils. This blocks access to properties, is inconsiderate and in cases illegal, and can cause gridlock.
- Cars are often waiting as early as 2pm to pick up pupils meaning that cars would still be using Wrotham Road if the car park is already full.
- There is no assurance that parents would not continue to park away from the school site but merely that it will “help discourage” them from doing so. There is and will not be any parking enforcement arrangements in place to prevent this from happening in the future.

Other matters

- Cars queuing would result in an increase in air pollution at school start and finish times posing a risk to the wellbeing of children who can suffer a range of health impacts as a result.
- Cycling in the vicinity of the school is currently not well provided for and the additional traffic would make local roads even more hazardous for cyclists.
- It is considered that the proposed development is inappropriate for the rural locality.

Discussion

37. In considering this proposal regard must be had to the Development Plan Policies outlined in paragraph (32) 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. Section 70(2) of the Town and Country Planning Act 1990 provides that the local planning authority shall have regard to the provisions of the development plan, so far as material to the

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application, and to any other material considerations. The proposal therefore needs to be considered in the context of the Development Plan Policies, Government Guidance, including the National Planning Policy Framework (NPPF), and the Planning Policy Statement for Schools and other material planning considerations including those arising from consultation and publicity.

38. This application is being reported for determination by the Planning Applications Committee due to letters of representation received from the Local Member, Meopham Parish Council, Sport England, and local residents objecting to the planning application. In this case the key determining factors, in my view, are need and the principle of the development, design and impact upon local amenity, Green Belt considerations, the Sport England objection, biodiversity and traffic and parking considerations.
39. In the Government's view, the development of schools is strongly in the national interest and planning authorities should support this objective, in a manner consistent with their statutory obligations. In considering proposals for the creation, expansion and alteration of schools, the Government considers that there is a strong presumption in favour of state funded schools, as expressed in the National Planning Policy Framework and reflected in the Policy Statement for Schools. Planning Authorities should give full and thorough consideration to the importance of enabling such development, attaching significant weight to the need to develop state funded schools, and making full use of their planning powers to support such development, only imposing conditions that are absolutely necessary and that meet the tests set out in paragraph 56 of the NPPF.

Need and principle of development

40. As outlined in paragraph 32 of this report, the National Planning Policy Framework (NPPF) supports the provision and retention of community facilities as a means of place making and promoting healthy and sustainable communities. Decisions should be made which guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs. It should also ensure that established facilities and services are able to develop and modernise in a way that is sustainable and retained for the benefit of the community.
41. Additionally, Paragraph 95 of the NPPF 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 would widen choice in education. They should give great weight to the need to create, expand or alter schools, and work with school's promoters to identify and resolve key planning issues before applications are submitted. There is similar strong policy support in the Government's Planning Policy Statement for Schools (2011).
42. The application site forms part of a wider established education site, namely Meopham School, together with associated parking areas and open playing field. The proposal is to accommodate a 2FE (60 pupils per year in Years 7 to 11) expansion to help meet an identified demand for additional non-selective secondary school places in the Gravesham Borough area.
43. As referred to above, the School expanded in 2018 when the new 3-storey building was constructed to provide accommodation for up to 798 pupils, comprising of 700 in Years 7 to 11 (PAN of 140 per year) and up to 98 in the sixth form. However, to meet educational needs for the past 4 years the school has taken an additional 30 pupils each year in Year 7, bringing the PAN up to 170 pupils a year, at the request of Kent County

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Council as Local Education Authority. From September 2021/2022 the School admitted an additional 30 pupils in Year 7 and thus starting the full 2 FE expansion of 200 pupils in Year 7. Due to a shortage of space within the 3-storey building for these additional pupils, their needs have been accommodated in temporary buildings on the site in five modular buildings. To accommodate the additional pupils for the September 2022/23 intake, two further modular buildings are proposed to be erected on this school site pursuant to Permitted Development Rights. The applicant has confirmed that to be able to accommodate the existing pupils already on this site and the proposed pupils, there is a clear needs case for proposed permanent development at this site. Following the provision of permanent accommodation the temporary modular buildings would be removed from site.

44. Support for the provision of school places is also heavily embedded in the NPPF, and I consider that the education need for the proposed development should be given significant weight in this instance. There is considerable demand for non-selective secondary school places in Gravesham, as outlined in paragraph 5 above, and to ensure the future provision of secondary education in Gravesham. In considering the above, I accept the need for the proposed development.

Green Belt Considerations

45. By virtue of the criteria in the NPPF the development is inappropriate in Green Belt terms. Although paragraph 149 of the NPPF lists examples of development that could be considered appropriate within the Green Belt, I consider that the proposals would not meet these exceptions and that the development is inappropriate. Inappropriate development is, by definition, harmful to the Green Belt and it is for the applicant to demonstrate why permission should be granted. 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 special circumstances that would warrant setting aside the general presumption against inappropriate development.
46. Whilst the proposed new 2-storey building is located in a part of the site previously occupied by school buildings, it is accepted the proposals would lead to an intensification of the existing use of the site, and an increase to on-site build massing. This therefore constitutes inappropriate development by virtue of not falling into any of the Green Belt exception categories. However, the applicant considers that there are 'Very Special Circumstances' that exists which would sufficiently outweigh the presumption against inappropriate development in the Green Belt.
47. A Planning Statement 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 inappropriate development in the Green Belt. The applicant considers the following 'very special circumstances' are sufficient to collectively outweigh any Green Belt policy objection:
- i) The identified education need and operational need for additional secondary schools places in Gravesham;
 - ii) A lack of suitable alternative development options;
 - iii) The need for a dedicated pupil drop off/pick up facility;
 - iv) The extent of community and sustainability benefits the proposal would deliver;
- and,

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- v) The quality of the design and level of mitigation proposed that would ensure that the impact on the openness of the Green Belt would be substantially limited in comparison to the existing school site.

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 additional secondary school places in Gravesham.

Case of need

48. As outlined in paragraph 32 of this report, great emphasis is placed within planning policy generally and specifically in paragraph 95 of the NPPF, on the need to create, expand or alter schools. The NPPF states that Planning Authorities should take a proactive, positive, and collaborative approach to meeting this requirement, and to development that would widen choice in education. The Policy Statement – Planning for Schools Development (15 August 2011) also sets out the Government’s commitment to support the development and expansion of state funded schools to adapt and improve their facilities. There is a presumption in favour of the development of state funded schools and their facilities expressed in both the NPPF and the Policy Statement – Planning for Schools Development. Policy CS10 of the Local Plan Core Strategy seeks to support the development of infrastructure facilities required to resolve existing deficiencies of ‘infrastructure encompassing education and community facilities.
49. These very specific local education planning objectives are then supported at national level with the NPPF, at paragraph 95, stating that the government is committed to ensuring a sufficient choice of school places is available to meet the needs of existing and new communities. The importance of skills development to increasing equality, promoting social cohesion, and improving economic efficiency are themselves core objectives of the various policies outlined above in paragraph 32.
50. The applicant has confirmed that over the past ten years the number of children born in Gravesham has continued to be higher than expected. It is anticipated that there would be significant short and medium-term pressure for additional Year 7 places in the Gravesend and Longfield Non-Selective Planning Group which indicated that additional capacity is needed for 2020/21, continuing for later years. These population increases have required the expansion of nearby primary schools, and the increased numbers arising from the primary expansions are now impacting on the secondary school capacity. Medium scale housing development and these high birth rates are bringing new families to the area requiring enhancements to the infrastructure in order to meet the future needs of the town and its residents. The 2022 – 2026 Kent Commissioning Plan provided forecasts that indicate a sustained increase in the demand for non-selective secondary school capacity. Furthermore, this increased demand is showing no signs of reducing over the forecast period.
51. The deficit of places would be further exacerbated by limited options for alternative expansions within the Gravesham Borough area unless additional capacity can be created. Meopham School is a popular school with an Ofsted rating of ‘Outstanding’ and the proposal to increase the number of secondary places at the school is therefore, in line with the expectation of expanding popular & successful schools. Furthermore, the proposed 2FE expansion of the existing school would help secure additional non-selective secondary places to meet the forecasted increase in demand due to the larger primary cohorts emerging from Gravesham primary schools.

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52. Based on the above, in my view it is evident that a clear case of need for additional secondary school places within the Gravesham Borough area exists, which is largely within the Metropolitan Green Belt. 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 provided both existing and projected figures which demonstrate an existing shortfall within the Gravesham Borough area, and a future need which would be outstripped by demand unless additional places are provided. Support for the provision of school places is heavily embedded in the NPPF, and I consider that the need for the development should be given significant weight in this instance. Having accepted a need for additional secondary school places with the Gravesham Borough area, it is now important to consider how these places would be provided.

Alternative Development Options

53. As part of the applicant's case of very special circumstances, alternative development options have been assessed as part of the process to propose an expansion to the Meopham School, the Area Education Officer assessment of alternative sites and possibilities was undertaken by the Local Education Authority. There are seven secondary schools in the Gravesend and Longfield Non-Selective Planning Group. These are: Longfield Academy, Meopham School, Northfleet School for Girls, Northfleet Technology College, Saint George's CE School (Gravesend), St. John's Catholic Comprehensive School and Thamesview School.
54. Of these, St John's Catholic Comprehensive School, Thamesview School, St George's CE School and Northfleet School for Girls have either been expanded or are the subject of a proposal to expand. Northfleet Technology College is under feasibility for an expansion and Longfield School has been offering additional places under a local arrangement for several years. Meopham School is the only remaining option for expansion and has the space to do this without impacting on its playing field provision.
55. The Local Education Authority has a statutory duty to provide sufficient school places and on balance, to address the current and future demand for additional non-selective secondary places, considers that Meopham School provides the best solution to ensure that the local communities in Gravesham have access to a school of their choice which offers high quality teaching facilities
56. In summary therefore, and having considered the above, I am satisfied that the applicant has taken all reasonable endeavours to consider all possible sites for expansion within the Gravesham Borough area and that all the other potential sites have either been expanded or are the subject of a proposal to expand. Therefore, I accept this is the only viable option in this instance. The site is available, suitable, deliverable and in the correct location to address the need for additional non-selective secondary school places in the Gravesham Borough area. Moreover, the site has an established educational use, and includes some previously developed land within the Green Belt. In light of the above, I consider the redevelopment of the application site to be the most appropriate solution in this instance. Having accepted the need for the development, and the suitability of the proposed application site, the following sections of this report would concentrate on the very special circumstances put forward by the applicant with regard to the redevelopment of the application site itself.

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Wider Community Benefits

57. The applicant considers that the proposed development would lead to several demonstrable community benefits. The first of these is the improved educational facilities that the proposals would provide much needed and additional non-selective education facilities within the Gravesham Borough area. A more direct community benefit would be the improved facilities, which would not only be available to pupils, but to the wider community, once the details have been agreed upon by the School and which can be secured by a planning condition.
58. The application as proposed seeks to provide additional and non-selective secondary school places within the Gravesham Borough area, removing the need for local pupils to travel out of the Borough to obtain the necessary level of education. Furthermore, the proposals make provision for new cycle parking spaces, a dedicated bus parking area, a new car park which would allow for parents to drive onto the school site to drop off and collect pupils and the improved pedestrian facilities within the site. The applicant considers that these are attributes, in conjunction with the implementation and continued monitoring of the School Travel Plan and the Car Park Management Plan, to ensure that the additional traffic and parking is managed.
59. Although both of the above are positive attributes of the scheme as proposed and do go some way to support the redevelopment of this Green Belt site, I do not consider that these benefits on their own would outweigh the presumption against inappropriate development within the Green Belt. I therefore consider that the impact of the development as proposed on the openness of the Green Belt needs to be addressed, which, in conjunction with the above, may collectively outweigh the harm to the Green Belt.

The need for a dedicated pupil drop-off/pick up facility

60. The applicant previously submitted a planning application for a 2 Form of Entry expansion to Meopham School in March 2021. That planning application attracted a number of representations from the local community, with the focus of concern being the potential impact of the proposal on highways and parking. The applicant withdrew that scheme in June 2021, to enable the design team to review all of the feedback in detail and develop an improved proposal based on the feedback from the local community. The applicant considers that the scheme now represents a substantially improved proposal which, crucially, now includes a new dedicated school car park area with a pupil drop-off and pick-up facility which should significantly reduce the impact of the proposal on the local highway network.
61. This additional feature of the proposal is specifically required to help mitigate the impact of the proposal on the local highway network, which in turn is being driven by the education need for this project. The applicant considers that this additional mitigating feature, and critical piece of infrastructure, is necessary to address the proposed increase in pupils and the associated traffic and parking that this application would generate. I therefore consider that the new pupil drop off/pick up area to serve an expanded secondary school could be considered to be a Very Special Circumstance.

Impact on the Openness of the Green Belt

62. It is accepted that the proposal would lead to an intensification of the site and an increase in on-site building massing and additional hardstanding. In this regard, it is acknowledged that there would be a greater impact on the openness of the Green Belt

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when compared to the impact associated with existing site conditions. However, it is contended that, through pre-application consultations, a carefully thought-out high-quality design and mitigation package has emerged that, upon implementation, would substantially limit and go some way to mitigate the impact associated with the proposal on the openness of the Green Belt when compared to existing site conditions. In order to undertake this 'openness' assessment, careful consideration needs to be given to the extent of impact on openness from the existing school and how the proposal impacts on the locality, and in particular any impact on views into the Green Belt.

63. Whilst full consideration is given on these matters, it is important to note that the site is well screened from public views by mature trees and other forms of soft landscaping along all its boundaries and especially to the east facing Wrotham Road. The proposed development does not seek to significantly alter any of this boundary landscaping, and thus the site would continue to be well screened from the surrounding area and, even where limited views into the site exist, the overall appearance and character of the site would be generally unaffected by the proposals, especially when set against the context of the existing school building and surrounding buildings also within the Green Belt, including the medical centre, the library, the nursery and the fitness and tennis centre.
64. Moving onto the new building itself, this would add a further 2,401m² of GEA floorspace within a two-storey flat roof building. In terms of topography, the site steps down from the east to the west. This would help to significantly reduce the visual impact of the new building since it would be positioned on a lower position of the site when compared to the site entrance at Wrotham Road. In addition, the new 2-storey building would be lower than the existing school block which is 3-storeys in height. To help further reduce its visual impact on the openness of the Green Belt, the existing school site benefits from substantial visual screening afforded by boundary landscaping along the Wrotham Road boundary. There would be limited views of the new building when viewed from the east.
65. It should be acknowledged, that the location of the new building is where the original school buildings were located before they were demolished and replaced with the current 3-storey school block. In this respect, the massing of the new build would not be significantly different to historic build massing on site. It is understood that the original school buildings varied in height between two and three storeys. In addition, the new building has been designed to be sub-servient to the existing 3-storey building both in terms of its presence, massing, and architectural finish. It is proposed to have secondary importance in comparison to the existing school and the design of the proposed building has been heavily influenced by the surrounding area and wider landscape character. This is emphasised using horizontal volumes on the facade and slight difference in the colour palette for the cladding.
66. The other aspect of the proposal to note is the additional new car park and pupil drop-off pick up car park area. This new mitigating feature is proposed to be located immediately south of the Meopham Medical Centre. Immediately to the east is a heavily wooded area (separating the new car park from Wrotham Road), to the south is the school boundary denoted by an avenue of trees, and to the west is the school playing field. The new car park area would not include any buildings or structures but would include some low-level lighting columns to ensure the safety of students and parents. As such, the car park would not be visible from any nearby surrounding public vantage points. Its impact on the openness of the Green Belt would be minimal and be outweighed by the 'need' for this critical infrastructure that is necessary to help mitigate the impact of the proposals.

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67. In withdrawing the original scheme (reference GR/21/316 and KCC/GR/0041/2021), the applicant had the opportunity to review a number of options to help address the concerns that were raised in respect of the earlier planning application. In considering earlier representations, the applicant determined that a new school car park would be required to enable parents to drive off Wrotham Road and be able to drop off and pick up children safely and conveniently. The applicant has confirmed that the proposed new car park has been located in the only viable location to provide this mitigating feature and would in turn improve the wider shared car parking area for the users of the adjoining medical surgery, library and nursery. However, taking into account the above, it is accepted that the new car park feature would have a greater impact on the openness of the site and by implication the Green Belt compared to the existing situation given the scale of the proposals. The proposals however seek to minimise or limit the 'impact' given:
- a) the position of the new building on the lower plateau of the school site;
 - b) the proximity of surrounding buildings also within the Green Belt;
 - c) being subservient to the existing school building;
 - d) the screening afforded by boundary landscaping;
 - e) being located on a part of the site that historically has been occupied by 2 and 3-storey buildings; and,
 - f) adopting an architectural language that would complement and blend well with its landscape surroundings and backdrop.
68. In considering the planning application, the applicant has advised that the proposed development would encroach into the Green Belt, which may harm its openness. First, it is important to note that the site is well screened from public views by the mature boundary planting and screening. However, the 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.
69. The applicant advises that the siting of the new school building has been carefully considered so as to minimise its impact on the openness of the Green Belt. As detailed above, the proposed building would be located on the area of the original school which was demolished and the new 3-storey school building rebuilt on a different part of the school site. The building would therefore be viewed against the backdrop of the existing school building and the other buildings located on this site. As such, I am satisfied that the siting of the development is the most appropriate location within the site in terms of limiting the impact of the proposed school building on the openness of the Green Belt.
70. With regard to the new car park and pupil drop-off/pick up area, as stated above I am satisfied that these elements of the scheme are proposed in the most logical and appropriate location. These elements of the development are a 2-dimensional engineering solution, located behind the existing medical centre and located in an area that is well screened from public vistas. As such I am satisfied that they would not have a significant detrimental impact on the openness of the Green Belt.
71. Whilst the development proposals would inevitably have some impact on the Green Belt, I consider that the new building and associated car parking would be well contained within the immediate context of the existing school site, and that the impact of the proposals on the openness and functioning of the Green Belt would be limited. It is also of note that most of the school grounds to the south and west would continue to remain

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undeveloped or open in nature, reducing the overall impact of the development on the character of the site and its surroundings.

Summary – Very Special Circumstances/Green Belt Considerations

72. 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 policies and the NPPF. The development is inappropriate development for the purposes of Green Belt consideration and is, therefore, by definition 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. However, if Members were minded to grant permission, the application would need to be referred to the Secretary of State for Levelling Up, Housing and Communities and for his consideration before permission could be granted.

Design and Impact on Local Amenity

Siting and Layout

73. The distance between the existing Meopham School buildings' east elevation and the and the nearest residential elevation on the western side of the Wrotham Road is approximately 50m. The proposed development would not reduce this distance since the building would be positioned more centrally within the school site and further away from residential properties on both sides of Wrotham Road. Accordingly, the applicant has demonstrated that the separation distances between the proposed development and the nearest residential properties would be sufficient to avoid any significant adverse impact on local amenity. In addition, the level of existing boundary landscaping unaffected by the proposals would also help minimise impact on local amenity.
74. The 3D visuals that accompany this planning application demonstrate the proposal should not have any adverse impact on views from the east looking toward the application site. The new drop off / pick up car park facility would be located immediately south of the existing medical centre, and immediately west of an existing wooded area. This area of the site is not easily visible from outside of the school site, and this would continue to be case following development. Accordingly, it is considered that the proposed siting and layout of development satisfies the requirements of Core Strategy Policies CS01, CS10, and CS19 and NPPF objectives in relation to good design and impact on surrounding character.

Scale, Massing and Height

75. As already covered in paragraph 64 above, the proposed building would have a height that is lower than the existing school building. As noted, the building has been designed so that it would be sub-servient to the original school building in respect of its massing, height, and general appearance. Taking the above into account, in addition to earlier comments made regarding the impact on the openness of the Green Belt, the proposal is considered to be acceptable in scale and massing terms. The proposals would blend well with the existing site and ensure there is no loss of local amenity. The new building would be well screened on the Wrotham Road street scene, especially given the

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separation distances and the amount of boundary landscaping retained and enhanced in the landscape strategy.

76. It is therefore considered that the proposed scale, massing, and height of the development satisfies the requirements of Core Strategy Policies CS01, CS10, CS19 and Strategic Objective S08, and NPPF objectives in relation to good design.

Appearance and Materials

77. The appearance of the buildings has been subject to a series of pre-application consultations with officers and local stakeholders. The applicant states that the material palette of the proposed development has been selected to blend well with the existing school site and to inject a fresh and modern look to enhance the appearance of the site. This is demonstrated in the accompanying Design and Access Statement, which states the form, scale and massing of the development has been designed to fit in well with the existing building on the site. The new block would have a secondary importance in comparison to the existing school. This would help the user to understand the use of the two buildings. The topography of the site would also help to minimise the impact of the new block on the existing environment.
78. The design has taken inspiration from the surrounding landscape. This has been emphasised by the use of horizontal volumes on the facade and slight difference in the colour palette for the cladding. The proposal seeks to reinterpret key features of the existing building, such as the coloured windows frame, in a different way. This creates a campus look providing a distinction between the two buildings. The proposed palette of materials is of high quality and would secure a natural aesthetic. Notably the facades for the school building reinterpret the look of the existing building on the site and it would improve the general aesthetic of the site.
79. Taking the above into account, considerable thought has gone into the selection of materials and the overall appearance of the proposed schools, with particular regard to how it can not only blend in with, but also complement, the wider character of the area. It is demonstrated that the proposed appearance and chosen materials for the development meets the requirements of Core Strategy Policies CS01, CS10, and CS19 and NPPF objectives in relation to good design.

Sport England – Impact on Playing Field

80. Having accepted the siting and design of the development with regard to impact on the openness of the Green Belt, the local landscape and the amenity of the locality, the siting of the proposed new car park and pupil drop-off/pick up area must also be considered in terms of the Sport England objection. The applicant has confirmed that the proposed development had been the subject of a pre-application consultation with Sport England. Sport England's policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of, all/part of a playing field, unless one or more of the five exceptions stated in its policy apply see paragraph 33 above for the list of exceptions. Therefore, Sport England is of the view that the land required to accommodate the new car park and pupil drop off/pick up facility has been used for sport in the last 5 years. The applicant has however, stated that it is actually not the case.
81. The Headteacher has confirmed that this area of the school site has not been used for sport in the last 7 years, at least. He stated that this former area of the playing field is actually not suitable for sport purposes due to its condition. It has been confirmed that

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the condition of the ground is so poor that it is a health and safety hazard for any type of activity. The School does not allow students or staff to use this part of the field at all due to the trip hazards. It is very uneven due to debris, soil and significant mole activity, and it is overgrown. The only facilities left on the field are a pair of goalposts which are rusted and in a state of disrepair. The School does not have the funds to fix this area of the school's playing field and therefore states that the condition would only deteriorate further.



Google image of Meopham School playing field taken in 2018 (image provided by Sport England).

82. Furthermore, the Headteacher has also confirmed that the space is not used by the school and is not required to provide sporting activities for the students. The Headteacher has stated that the School has a large playing field that they invest in to provide sports facilities, including grounds maintenance, line painting and more recently goal posts. The PE department has also confirmed that even with the increased intake of students there is sufficient outdoor and indoor space to fulfil the curriculum, enrichment opportunities, sports days and community events. The applicant considers that this area of the school site is now surplus to the educational requirements and is the ideal and feasible location to accommodate the new car park and pupil drop off/pick up facility which is required to mitigate the additional growth in pupil numbers at the school.
83. The school's operational playing field, which is to the west of the proposed new car park area, and west of the existing school buildings, would remain unaffected by the proposals. The School has confirmed that it has sufficient outdoor and indoor recreational space to meet the needs of an expanded school cohort. On this basis, the applicant considers that the proposal satisfies Exception text E3 of Sport England's planning policy and based on the above, the applicant considers that the principle of development should be supported in accordance with relevant planning policy.

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84. However, Sport England in its response consider that the proposal is for an expansion of the school including the development of a new staff car park on part of the existing playing field. Sport England understand that the earlier application was withdrawn following objections from local residents regarding the potential of the new building to cause an increase in traffic visiting the school and that the current application is an attempt to resolve those concerns by providing additional parking on the school site.
85. Sport England state that the proposed new car park and pupil drop-off/pick up area would appear to be sited on an existing area of playing field that has been used for sport in the last 5 years based on a Google image from 2018, however this is disputed by the Headteacher who claims that this area of the playing field has not be used for at least the last 7 years. There is a difference of opinion as to the last date that this playing field was indeed used. The School does not dispute that this area of playing field had been used for sport but over the years it has become unsuitable for sport purposes due to its condition. The goal posts that can be seen in the Google image had not been taken down hence they are apparent in the Google image from May 2018 and suggest it was possibly in use at that time.
86. As outlined in paragraphs above, I accept the need for expansion of the school as part of the County Council's Basic Need Project, including the need for additional associated car parking and that this is located on an unusable part of the playing field. The area the proposed car park and pupil drop-off/pick up area would not affect the ability for the remaining section of this unused playing field to be able to be used again in the future for some recreational use (if the school ever decided to) and I consider the development as proposed represents the most suitable and practicable option for the site and should be balanced against the need for the development and wider benefits to the community of this education facility. It would be very difficult to accommodate the new car park and pupil drop-off/pick up area elsewhere within the school site without prejudicing other planning requirements and objectives such as retaining trees and maintaining the usable playing field to the west of the school site. Accordingly, I consider the development as proposed represents the most suitable and practicable option for the site and is not sufficient to outweigh the need for the development.
87. Should Members be minded to agree with the recommendation of this report and grant planning permission subject to conditions, then in accordance with The Town and Country Planning (Consultation) (England) Direction 2009, the application should be referred to the Secretary of State for Levelling Up, Housing and Communities for his consideration.

Access, parking and highway matters

88. As can be seen from the representations summarised in paragraph 36 of this report and the consultation responses summarised in paragraph 33, specifically the views of Meopham Town Council and Mr Sweetland, the Local Member, this application has met with significant objection on the grounds of additional traffic, access, parking and general highway matters. It is considered by those that have raised objection that the local highway network, and the entrance and exit from the school site onto A227 Wrotham Road, cannot safely accommodate the additional traffic and parking associated with the proposed 2FE expansion of the school, that insufficient on-site parking is being proposed, and that the development as a whole would have a unacceptable impact on the existing highway network, exacerbating existing traffic and associated congestion, and parking both on the Wrotham Road and in surrounding residential roads.

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89. Previously the applicant submitted a planning application for a 2 FE expansion to Meopham School in March 2021 (reference GR/21/316 and KCC/GR/0041/2021). That planning application attracted a number of representations from the local community as well as objection from Meopham Parish Council, and the Local Member and a holding objection from Kent Highways, with the focus of concern being the potential impact of the proposal on highways and parking. The applicant subsequently withdrew that planning application in June 2021, to enable the design team to review all of the feedback in detail and develop an improved proposal based on the feedback from the local community.
90. The applicant considers that the scheme now represents a substantially improved proposal which includes a new dedicated school car park area with a drop-off and pick-up facility that is proposed to significantly reduce the impact of the proposal on the local highway network. The proposed new building itself has not changed, but the application site area has increased to encompass the new car parking area involving land within the applicant's ownership.
91. Following withdrawal of the original application, the applicant has reviewed a number of options to help address the concerns that were raised previously regarding access and highway matters. The applicant considers that the proposed new car park is the only viable location to provide this mitigating feature and would in turn improve the wider shared car park area for users of the adjoining library, medical centre and nursery. The new pupil drop-off and pick-up facility would provide space for parents to park on-site, away from Wrotham Road and the local streets. Furthermore, the car park has been designed with a 'fast-track' drop-off lane for use in the mornings, and standard parking bays to allow parents to park up and wait at the end of the school day.
92. It is also proposed that the internal road layout would be upgraded to improve circulation of traffic and upon entering the site, the carriageway would be widened to two lanes to separate traffic using the new drop-off and pick-up facility and traffic accessing the library, medical centre, nursery and tennis and fitness centre. Priority would be given to traffic entering the site, with traffic exiting the new drop-off and pick-up facility being required to give-way. It is proposed to improve signage and road markings to clearly guide drivers through the site. A new bus only zone is also proposed to be created so that buses are separated from other traffic and do not block vehicles when they are stopped. All car parking currently situated in the proposed bus only zone would be relocated so no exiting parking would be lost.
93. As also proposed in the original application, a new staff car park would be provided close to the existing school building. A Car Park Management Plan has been created by specialist transport consultants to assist the School in managing the new access and parking arrangements, which the School has confirmed a commitment to enforce on school staff, children and parents. The Car Park Management Plan forms part of the School Travel Plan and the School has made a commitment to update both documents on an annual basis.

Traffic impact on A227 Wrotham Road, site access and on-street parking

94. Objection and concerns have been raised regarding the proposed extra traffic associated with the 2FE expansion. It has been suggested that additional traffic generated by this application would exacerbate existing difficulties and congestion at the junction of the A227. Further comments have been made that currently vehicles are unable to turn into the school site due to the congestion within the school site and which then results in vehicles not able to turn right out of the school site due to the queuing

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traffic on the A227. Consequently, the whole of the school site internally can become gridlocked, and concern has been raised about the general safety of all road users.

95. Access to the school is achieved via a single access to the east of the site from Wrotham Road (A227), a well-lit A road which is subject to a 30mph speed limit. The access is approximately 6m wide and widens to 15m at the junction mouth. Wrotham Road varies in width from between 7m and 8m along its length. It provides links to both Gravesend to the north, and Borough Green and Wrotham to the south. There are no parking restrictions on the section of Wrotham Road adjacent to the site and there is a layby opposite the site access on the eastern side of the road where some drop-off/pick-up occurs. To the north of the site Wrotham Road provides a link to the A2, where the A2 can be used to join both the M25 at junction 2 and M2 at junction 1.
96. The single access to the site is shared by all the different land uses on the site. There is a one-way system in place for access to the medical centre, nurse, library and school, which leads to the unmarked parking areas for all the mentioned uses. The applicant has confirmed that the one-way route is clearly signposted leading around a kerbed grassed area with trees serving as an irregularly shaped roundabout on the site. There is a separate route following a right turn from the access that leads to the tennis and fitness centre. The current access to the site is to remain as per the existing arrangement off Wrotham Road, however changes are proposed to the internal access and egress arrangements within the site (discussed further below).
97. Within the accompanying Transport Statement, a 'hands up' survey of pupils was undertaken in October 2021 as part of the School Travel Plan survey which showed that the main transport mode for pupils is by car (43% with a further 9% parking nearby and walking). 25% of pupils travelled to school by bus, 12% walked to school and [less than] 1% cycled. The high proportions of pupils travelling by bus/car was attributed to the rural nature of the school and wide catchment area which includes Gravesend. It was also confirmed that the majority of staff drive to/from the school (93%).
98. The Transport Statement concluded that the proposed 2FE expansion would attract an additional 196 pupils travelling to the school by car in the AM Peak compared to the the Planning Baseline and an increase of 136 pupils travelling by car, compared to the existing situation. In the PM peak the proposed expanded school would generate an increase of 256 pupils travelling by car compared the Planning Baseline and an increase of 136 pupils travelling by car compared to the existing situation. The traffic impact assessment demonstrates that in the AM peak hour, there would be a 16% increase in trips on the Wrotham Road north arm and 12% increase on the Wrotham Road south arm in a 2026 + Development scenario, compared to the 2026 planning baseline scenario. In the PM peak, there would be a 13% increase in trips on the Wrotham Road north arm and a 12% increase in trips on the Wrotham Road south arm. It should be noted that some of the pupils currently car share with a friend and this number is likely to rise and some pupils have a sibling already attending the school, so it should be noted that the pupil numbers quoted above are worst case scenario.
99. Traffic and parking surveys were undertaken by the Transport Consultant which concluded that during the AM peak, most pupils were dropped-off on site and so there was a quick turnover of vehicles. In the PM peak however, most pupils were picked up off-site with parents parking mainly on Wrotham Road, Meadfield Road, Cheyne Walk and Shipley Hills Road. It was also noted that there was a slower turnover of vehicles due to parents parking up and waiting for their children to leave the school. This parking was noted to have started from about 14:30hrs and went on until 15:15hrs, which is the time that the school day finishes, before most vehicles started to depart. It has been

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assumed that this trend would continue and that some parents would continue to choose to park off-site.

100. On-street parking in the local area is mostly unrestricted, excluding a section of double yellow lines on both sides of the carriageway from the bus stops to the north of the school on Wrotham Road, northbound to its junction with The Street and protection at local junctions. The Transport Consultant has carried out a series of parking surveys in both the morning drop off and afternoon pick up within a 400m walk of the school site. The Transport Consultant noted that these surveys were undertaken at a time when the UK government was advising people to work from home if they could due to the COVID-19 pandemic. Therefore, the level of on-street parking observed could be higher than during pre-pandemic conditions and the findings are considered to present a robust scenario.
101. The utilisation of on-street parking in the AM drop-off period was observed to be fairly consistent across the study period, with the highest number of parked cars observed at 08:10am with 37 vehicles parked and 98 spaces. However, given that the school day starts at 08:40am, this was likely to be attributable to residents rather than parked cars associated with the school. However, the utilisation of on-street parking in the PM pick-up showed that the highest level of on-street parking to be observed at 15:05pm (the finishing time of the school) with a total of 91 vehicles parked in the study area. At the end of the school day, most pupils were collected off-site with parents parking on Wrotham Road, Meadfield Road, Cheyne Walk and Shipley Hills Road. It was also noted that during the parking survey period, that about 10 of the vehicles parked at this time were in areas deemed unsuitable for parking such as in bus stop laybys or on double yellow lines.
102. Kent Highways requested that the applicant open up a dialogue with Gravesham Borough Council (GBC) Parking Manager, as the appropriate parking enforcement authority to discuss the on-going parking issues around the school site and the inconsiderate parking by some parents. Following these discussions, the GBC Parking Manager considered that there were already adequate parking restrictions on Wrotham Road and did not consider that any on-street parking restrictions on the residential roads were appropriate. He also stated that any highway safety related restrictions were the responsibility of the Highway Authority (Kent County Council) and any obstructions or inappropriate parking were the responsibility of the Police. Furthermore, the GBC Parking Manager confirmed that the school should regularly liaise with him regarding any known problems but should contact the police for any cases of obstruction.
103. Further to the requested discussions with GBC Parking Manager, Kent Highways have requested that the school communicates with parents regarding the impact on local residents of inappropriate parking and liaises fully with the Parking Manager. Kent Highways have otherwise confirmed that their concerns on this issue have been fully investigated and accepted that there is nothing further to be considered regarding the parental parking in the residential roads surrounding the school.
104. It is acknowledged from the parking survey that was carried out by the Transport Consultant that parents do generally drop off their children on the school site for the start of school but during the afternoon pick up, most parents do park on the surrounding residential roads as they find it quicker to leave once school has finished. Although it is acknowledged that this may cause a problem for some local residents with some inconsiderate parking, generally the parents are not parked up for a long period of time and they remain in their vehicles and so could move their vehicles, if needed. Also there would be an element of on-street parking around any school at the start and the end of

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the school day which is to be expected and so there is very little that can be done from preventing vehicles from parking on the public highway.

105. In this particular instance, the School has agreed to join the Secondary School – Responsible Parking Initiative as an Action in their School Travel Plan, and to hold an annual meeting with local residents to discuss parking matters. The School is also proposing to set up a car sharing database for both parents and staff as a way of reducing vehicle trips to and from the school, but also as a way of reducing the number of parents parking on the surrounding residential streets as a result. Whilst the School is unable to prevent parents from lawfully parking in the surrounding roads, the School is mindful of the proposed increase in traffic movements that the 2FE expansion would bring and therefore mitigation measures are proposed as part of this planning application by providing an 81 space on-site car park for parents which also includes a pupil drop-off/pick area for up to 14 vehicles. In total this facility would provide enough parking spaces and pupil drop-off/pick up spaces for up to 95 vehicles at any one time plus there is extra capacity within the access road leading to the car park and within the actual aisles for more vehicles to be waiting to park or to drop off or collect pupils. The school is also proposing to implement an information and publicity campaign to parents promoting use of the new drop-off/pick-up facility on site and further discouraging on-street drop-off/pick-up.

106. I am mindful that the School is proposing to provide a new on-site car park for parents and a pupil drop-off/pick up facility, as well as internal site access and circulation improvements. In addition, as part of the School Travel Plan, the School would promote, encourage and monitor the use of this car park as a way of reducing parking in the surrounding residential roads and that this would be annually reviewed. Funding and a commitment to this review would be part of the required Memorandum Of Understanding (MOU) between the Council's Children, Young People and Education (CYPE) and Highways Transportation & Waste (HTW) Directorates. On this basis, Kent Highways have considered the planning application and have raised no objection on parking grounds. Subject to the imposition of conditions and the MOU requested by Kent Highway, I do not consider that the proposed development would have a significantly detrimental impact on the highway network with regard to off-site car parking and therefore see no reason to refuse the application on this ground.

Congestion on the A227, on-site parking and internal alterations to the road layout

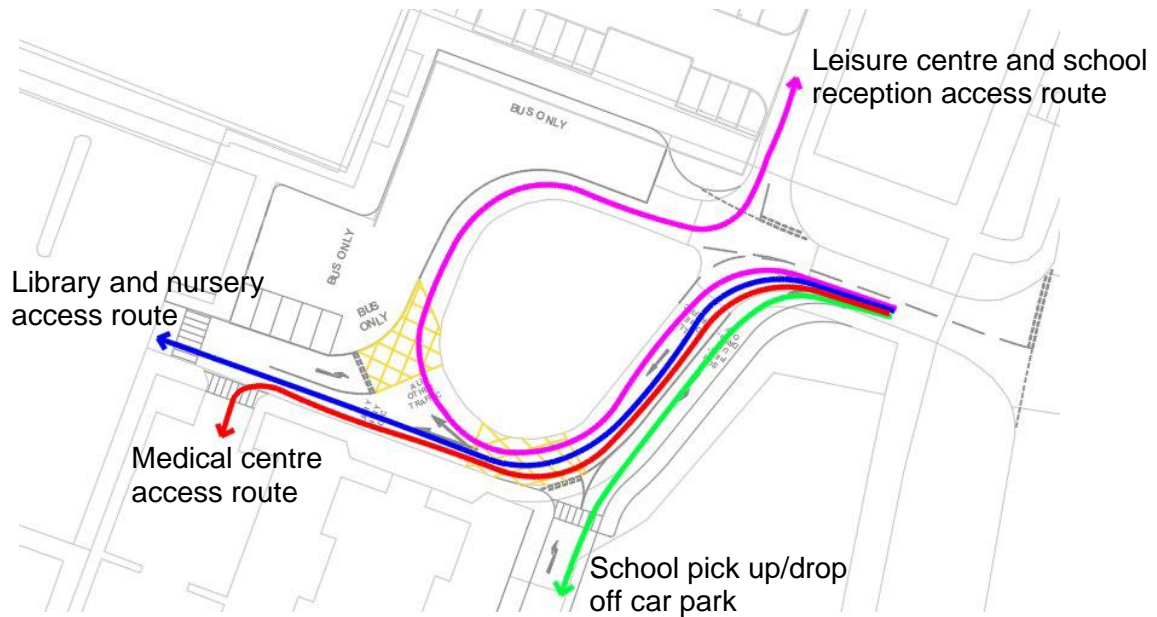
107. Concern has been raised due to vehicles queuing to enter and leave the school site and that this causes congestion on both the northbound and southbound sides of the A227 Wrotham Road. There is a single access to serve all the users of the site and currently there is gridlock within the site at the end of the school day as vehicles try to enter or leave the site and end up blocking each other as no one is able to move.

108. The applicant has confirmed that currently, during the peak drop-off and pick-up times, school traffic can block access to the other facilities on the site and queueing traffic can block back to the site access junction. As a proposed mitigation measure, the internal road layout would be upgraded to improve circulation of traffic within the site and to separate the pupil drop-off/pick-up traffic from traffic associated with other facilities. Upon entering the site, the carriageway would split into two lanes and all traffic would be required to circulate around the internal 'roundabout' to exit the site. The left lane would lead to the new pupil drop-off/pick-up car park and the right lane is to be used by all other traffic entering the site (including buses). Traffic would no longer be able to turn immediately right upon entering the site to access the fitness and tennis centre, as this is proposed to reduce conflict near the site access and the likelihood of traffic backing up

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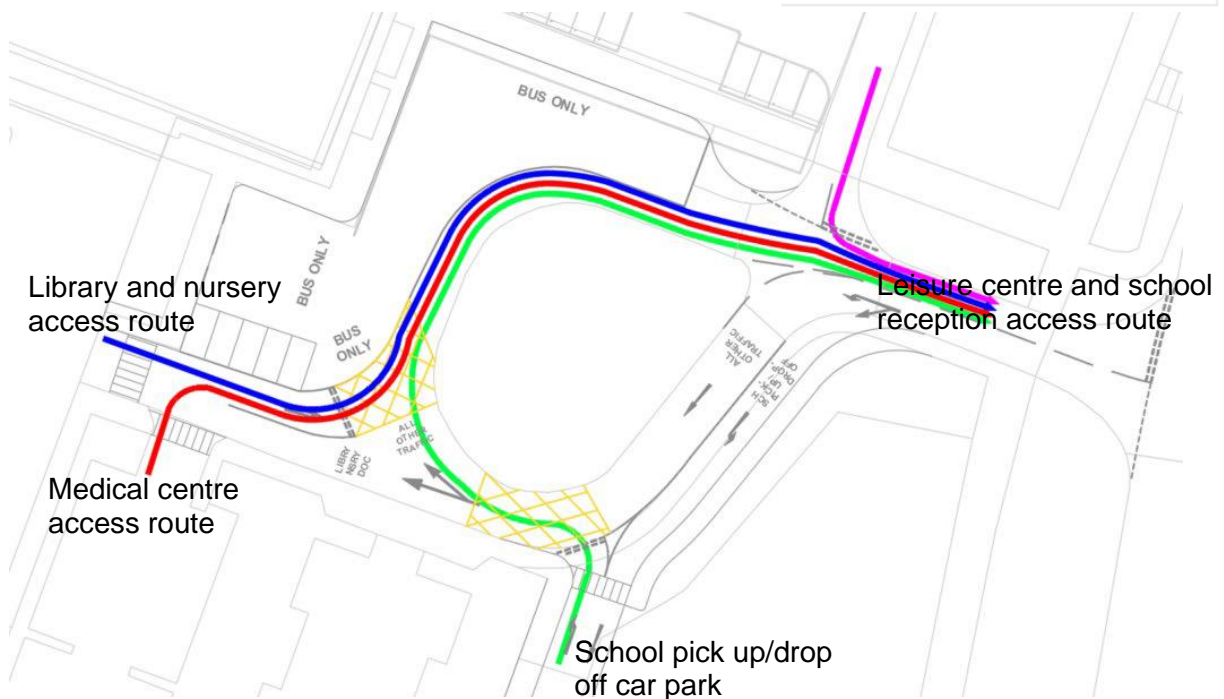
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as vehicles wait to turn within the site. The future access routes for visitors to each facility is shown in the drawings and key table below.



Site entry strategy

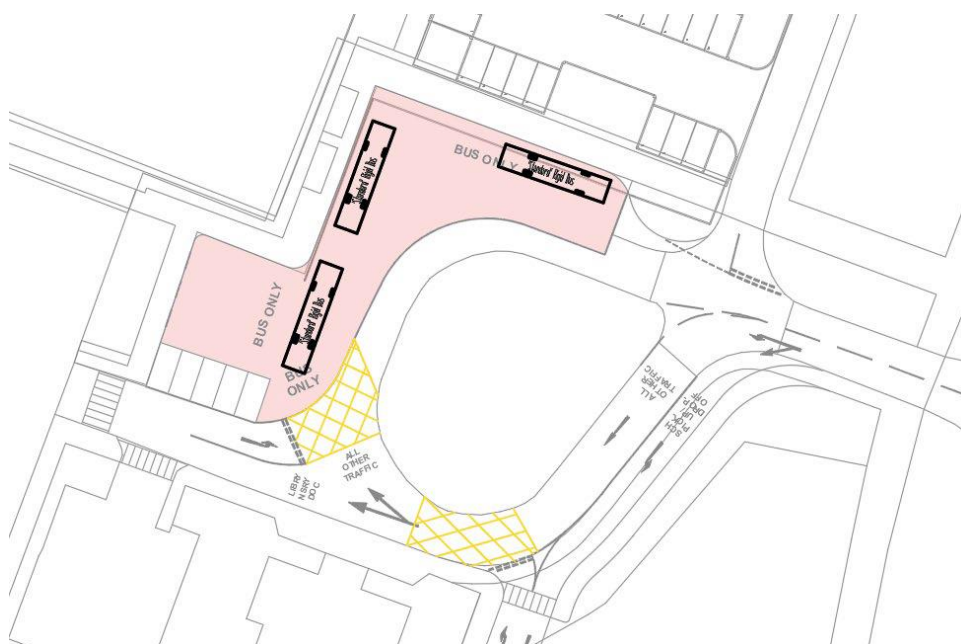
- LEISURE CENTRE AND SCHOOL RECEPTION ACCESS ROUTE
- MEDICAL CENTRE ACCESS ROUTE
- LIBRARY AND NURSERY ACCESS ROUTE
- SCHOOL PICK UP/DROP OFF CAR PARK



Site exit strategy

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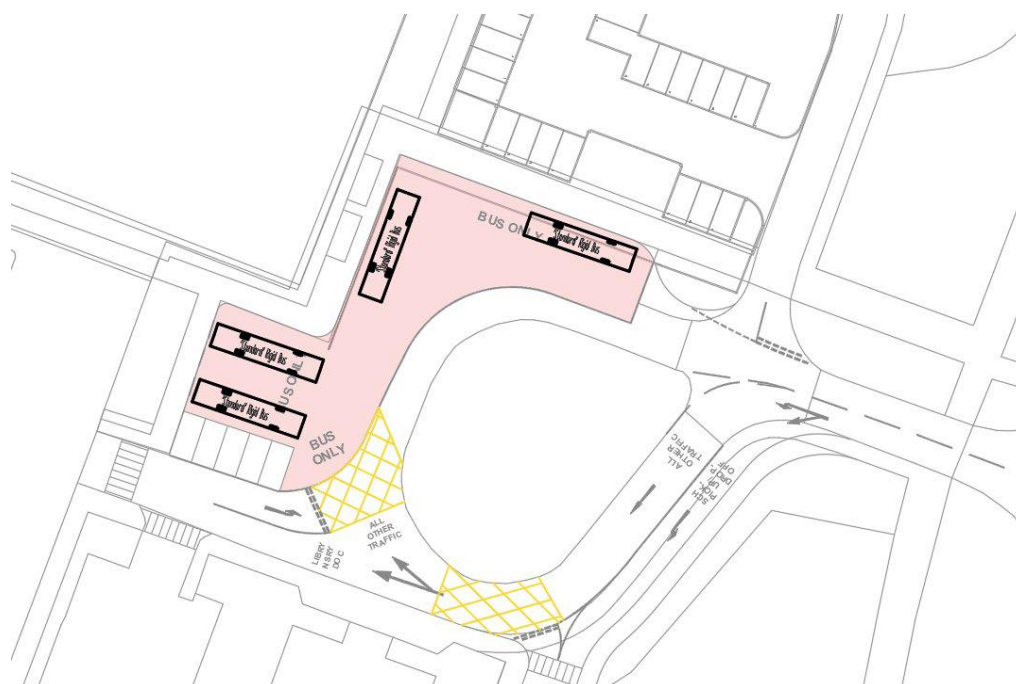
109. It is proposed that the on-site traffic signage would be updated to reflect the new access strategy. Lane markings would also be provided clearly indicating to drivers their direction of travel within the site. All users would continue to exit the site via the existing Wrotham Road junction. Vehicles travelling around the internal 'roundabout' would merge with the bus lane within the site so that all vehicles would use one lane to exit the site. Vehicles from the fitness and tennis centre and staff parking area to the north would continue to use the junction onto the access road to exit which would be onto the one lane merge. Vehicles from the fitness centre and staff parking area would also be able to travel straight ahead to enable staff to access other spaces on site should the car park near the school entrance be full.
110. To help buses to be able to turn around within the site without blocking the internal traffic, a bus only zone is proposed to be created adjacent to the internal roundabout. The bus zone would be clearly demarcated and has been designed so that in the AM peak, 3 buses would be able to park up concurrently and depart independent of each other, whilst in the PM peak the bus only zone has been designed so that 4 buses would be able to park concurrently, with 2 buses reversing into position before the end of the school day (as occurs currently).



Configuration of the bus zone in the AM peak

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Configuration of the bus zone in the PM peak

111. The creation of the proposed bus only zone would result in the removal of 15 parking spaces, however these would be relocated to the proposed pupil drop-off/ pick-up car park so that no parking would be lost. It is anticipated that the new bus only zone would significantly improve safety for pupils boarding and alighting buses by providing them with a dedicated area. The dedicated area would mean that buses would no longer block other traffic on the internal roundabout which site observations have shown can cause blocking back to the site access on Wrotham Road. It is anticipated that this arrangement would also improve the operation of the site access during peak drop-off/ pick-up times.
112. To accommodate the increase in staff, an additional 42 parking spaces (1 per staff member) are proposed to be provided for staff. The parking currently on site is shared between all uses of the site, however the new parking area would be for use by the school only. The School Travel Plan suggests that 93% of staff travel to the school by car. On this basis, the proposed level of provision is deemed sufficient to accommodate the parking demand arising from the additional 42 members of staff. 32 of the proposed parking spaces would be located adjacent and connected to the existing 6 disabled bays near the main school building. Access to 7 additional parking spaces would be provided via the internal access road to the tennis and fitness centre and the remaining 3 bays would be provided in the new pupil drop-off/pick-up car park, alongside relocated staff parking as a result of a proposed bus only zone within the site. 5 accessible parking bays are currently provided in a small 6-space parking area adjacent to the school entrance which are retained in this location. 4 accessible bays are also currently present in the location of the future bus only area and it is proposed that these would be relocated into the new staff car park. The School advises that no sixth formers drive to the site and on this basis no parking for sixth formers has been provided, but I recommend that this is monitored annually as part of The Car Park Management Plan review.
113. The applicant has confirmed that currently drop-off predominantly occurs within the site on the internal roundabout in the AM peak and offsite in the PM peak. To accommodate

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the additional pupils from the expansion, a new pupil drop-off/ pick up car park is proposed to be provided on land to the south of the medical centre (shown below). Entry to this new car park would be via a short access road along the eastern boundary of the medical centre. The proposed car park would have a total of 99 parking spaces of which 18 parking spaces would be for staff (comprising of 3 new bays and 15 bays relocated from the location of the proposed bus only zone) and a total of 95 spaces for parents to park. (81 parking spaces and 14 spaces within the pupil drop-off/pick up area). The new drop-off/ pick up car park would also be able to accommodate any increase in demand from visitors to the school site during the day, as well as providing a parking area for visitors during special events at the school such as parents evenings.



114. The applicant has confirmed that to accommodate the additional pupils, a new dedicated drop-off pick-up facility would be provided which would benefit all users of this site and the surrounding area. It is anticipated that these proposed improvements would help discourage parents from parking away from the school site, and instead use the new safe and conveniently located new car park. It would also help discourage parents from using the parking bays in front of the medical centre, nursery and library, which in turn would improve access to these facilities during school pick-up/drop-off times. Configuring the drop off/pick up area to give way to incoming traffic from the users of the other facilities on site is also proposed to provide a betterment. A Car Park Management Plan has been prepared to ensure the successful operation of the new car park and parking arrangements and to which the school has a confirmed commitment to enforce this management plan on school staff, children and parents. The Car Park Management Plan forms part of the School Travel Plan and the School has made a commitment to update both documents on an annual basis.

115. The applicant has provided mitigation measures to provide an on-site car park to cater for both the proposed increase in staff numbers and to accommodate the proposed increase in pupils and the associated increased traffic movements. The internal access road has been re-designed so that the traffic flow is improved within the site and so that it is easier and more appealing for parents to drive onto the school site, particularly

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during the afternoon pick up, and to collect their children. A bus only zone is also proposed to separate the buses from parked cars and traffic and to encourage more pupils to use the bus (to be discussed below) as their means of getting to and from school. Due to the proposed improvements within the school site and the anticipated improvements to the circulation within the school site, this should also reduce the congestion at the access point on the A227.

116. Kent Highways have been consulted on these proposals and have raised no objection to these proposed mitigation measures as mentioned above. I also consider that the proposals satisfies the requirements of the Core Strategy Policies CS01, CS10, CS11, CS19, and associated guidance with the NPPF. I would not therefore raise a planning objection on this matter.

Bus Service Improvements

117. There is local objection to the number of pupils that are driven to this school and the subsequent increase in traffic, parking and pollution that results and that Meopham School is being expanded to provide additional school places for children from other parts of Gravesham Borough to the detriment of local residents.

118. As referred to above, the Kent Commissioning Plan 2019-2024 has identified a deficit of secondary school places within the Gravesend and Longfield Non-Selective Planning Group. There are currently seven secondary schools within the Planning Group, of which six schools have either already expanded or are the subject of a proposal to expand. The Local Education Authority, who have a statutory duty to provide school places, have confirmed that Meopham School is the only remaining option for expansion.

119. The accompanying Transport Assessment and School Travel Plan data for July 2021 indicated that about a quarter of all school pupils travelled to this school site by bus, which is relatively low for a secondary school. When pupils were again surveyed in March 2022 to find out how they travelled to school, the percentage of pupils travelling to school bus went up slightly from 24.6% to 32.3%, and just 151 pupils at this school have a Freedom Bus Pass. As part of the assessment of the application, Kent Highways requested further consultations to take place with KCC Public Transport as the requested improvements to bus services had not been fully addressed following comments it made in previous holding objections.

120. A specialist third party survey company was commissioned by the applicant to undertake a bus usage/capacity survey at the school. A summary of the bus usage survey is provided below;

AM Peak Hour:

- 7 buses entered the site to drop off pupils.
- 6 out of the 7 buses had spare capacity. For 4 of the buses, the percentage occupancy was 60% or less.
- 1 bus stopped adjacent to the site on A227. This bus was 50% occupied on arrival. No pupils alighted at the stop.
- 166 seats (or 48%) were unoccupied during the AM peak hour on arrival at the site.

PM Peak Hour:

- 6 buses entered the site to pick up pupils.
- 5 out of the 6 buses had spare capacity. For 3 of the buses, the percentage occupancy was 60% or less.

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- 2 buses stopped adjacent to the site on A227, one of which subsequently entered the school to pick up pupils. The other bus was 100% occupied on departure.
- 92 seats (or 43%) were unoccupied during the PM peak hour on departure from the site.

121. The survey demonstrated that there was sufficient spare capacity in the existing buses stopping within the school site to accommodate the predicted additional demand for bus travel arising from the proposed expansion. However it was not possible to forecast any wider travel demand that there may be beyond capacity on existing routes, such as future student demand from areas where existing bus services do not currently serve. The survey of the existing bus service catchment area concluded that there was generally good bus service coverage of the densest student home postcode locations, albeit there appeared to be a service gap in the south-east of Gravesend urban area, in the area east of Wrotham Road, south of A226 Gravesend Road and north of A2 Watling Street.

122. Whilst no specific reason could be given to the relatively low uptake of pupil using public transport to this school site, Kent Highways were keen to promote the usage of public transport as a means of reducing car trips to this school site as a result of the proposed expansion. This is to be met through monetary contributions from the Local Education Authority secured via a Memorandum of Understanding (MOU). Kent County Council's Public Transport Team have confirmed that the current status of the commercial bus network and KCC's own position on its subsidised routes, means that future pressures on providing new or additional bus services arising from the school expansion would need to be met, through contributions from the Education Authority. This would be achieved via the proposed Memorandum Of Understanding

123. The policy basis for the MoU is KCC's 'Guidance on Securing, Monitoring and Enforcing Travel Plans in Kent (April 2012)' which sets out a mechanism for KCC to seek and secure monitoring funding for developments in traffic sensitive areas and where a significant mode shift is anticipated by the introduction of a Travel Plan and the consequent reduction in car trips effectively mitigates the development impact. If the monitoring of the School Travel Plan indicates that there would be bus capacity issues or car mode share would exceed the targets set out in the School Travel Plan, the Education Authority would agree to make additional payments to provide for additional bus capacity or other sustainable transport mitigation measures.

124. The applicant is therefore proposing mitigation to aid in reducing the impact of the proposed expansion on Meopham Village and the surrounding roads. A contribution of a maximum of £250,000 (the maximum sum payable per annum shall not exceed £50,000 for a maximum of 5 years) for public transport improvements to the school, should they be required. This sum of up to £50,000 per year is based on the cost of providing one bus service to the school throughout one school year. Additionally a £5,000 contribution to School Travel Plan monitoring and review is also being provided over a 5 year period. This review would take place annually by the School through the monitoring of the School Travel Plan and the details of this review being submitted to KCC's Travel Plan Monitoring Officer. This contribution has been agreed with the Education Authority through negotiations as a result of the consultations on this application. The payment would be secured via a Memorandum of Understanding as opposed to a legal agreement as the County Council cannot enter into a legal agreement with itself. A draft MOU has been received and should permission be granted for the development, that Memorandum of Understanding would form part of the application documentation.

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125. Kent Highways have been consulted on these proposals to address public transport improvements and have raised no objection to these proposed mitigation measures. I also consider that the proposals satisfies the requirements of the Local Plan's Core Strategy Policies CS11 and CS19, and associated guidance with the NPPF. I would not therefore raise a planning objection on this matter.

Further Highway Mitigation Measures

Car Park Management Plan

126. To ensure the successful operation of the car park, the School has agreed to implement a Car Park Management Plan comprising of a mixture of measures involving the education of students, provision of information to parents/visitors and patrolling of the car park by school staff during peak times. At the opening of the new drop-off/ pick-up car park, the School would implement additional measures to help guide parents in the use of the new facility and embed the new operational procedures of the car park. The Car Park Management Plan is provided within the planning application and has been incorporated within the School Travel Plan, so that both documents can be reviewed annually, and any changes and improvements made accordingly.

School Travel Plan

127. A School Travel Plan can be an effective mechanism to develop, implement and promote a bespoke package of initiatives designed around a specific school site and the 'users' travelling to and from the site. School Travel Plans include targets that aim to increase the proportion of journeys made by more sustainable modes to mitigate the impact of car-based trips, to promote active travel, reduce emissions and improve road safety. Importantly School Travel Plans operate on an ongoing basis with regular reviews and updates to ensure targets are being met.

128. The School would continue to encourage pupils to travel to and from the school site using modes other than the car. The School Travel Plan is a live document that would be required to be updated annually, as part of the agreed Memorandum Of Understanding (MOU) and be monitored by the Kent County Council Travel Plan Monitoring Officer. It is envisaged that this extra level of scrutiny would give the School Travel Plan more weight and greater confidence that the targets would be delivered as well as ensuring that the School Travel Plan would be an effective mitigation measure.

129. The annual monitoring would provide updated information about the pupils and where they live (through postcode information) and how they travelled to and from school. It would inform the School if the measures within the School Travel Plan's Action Plan were encouraging more pupils to either use the bus to school, car share, or walk and cycle to school. This information would also show if the existing bus services and bus routes were serving the areas where the pupils lived, or if there was a requirement to look at providing a new bus service to an area that currently was not served by a bus service. Then the proposed mitigation measures agreed in the MOU for improved bus service provision would be triggered to secure this new bus service.

Electric Vehicle Charging

130. A total of 4 parking bays within the new staff car park are proposed be provided with electric vehicle charging points. A further 8 parking bays are proposed to be provided with EV passive charging provision (ducting/cabling etc.), to allow conversion to charging bays in the future. This figure of 8 above, is based on the 42 proposed new staff parking

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spaces. This amount of requested EV charging points is based on the emerging policy of 10% active and 20% passive applied to the uplift in staff parking.

Cycle Parking

131. Currently the school does not have any cycle parking onsite and this is also reflected in the data in the School Travel Plan which confirms that currently less than 1% of pupils cycle to school and currently no staff cycle. However, 4% of pupils have identified cycling as their preferred mode of travel to and from school. As part of this application site, it is proposing to provide 20 cycle stands adjacent to the main entrance of the existing 3-storey building and an area would be safeguarded on the site to allow for the future addition of further cycle parking, if required. Usage and demand for additional cycle parking would be monitored through the annual review of the Action Plan in the School Travel Plan.

Summary – Access, Parking and Highway Considerations

132. The 2FE expansion of the School would give rise to an increase in highway movements in the vicinity of the site. I also recognise that some of the expansion and the highway impact of this growth in the locality has taken place or can take place this September due to the Permitted Development Rights that are afforded to the School site. To facilitate the full 2FE expansion, considerable negotiations have taken place to mitigate the impact of the increase in pupil numbers and a number of mitigation measures are proposed. These include the introduction of a new and dedicated parent car park and pupil drop-off/pick up area, the internal access improvements for all users of the site, improvements and the creation of a bus only zone, annual monitoring of both the School Travel Plan and Car Park Management Plan and the encouragement of the use of more sustainable modes of transport, monitoring of bus usage at the school with the potential to provide additional bus services to the school site. Collectively and effectively these would mitigate the impact of the proposed 2FE expansion upon the highway network. Subject to the imposition of conditions and the financial contribution towards bus provision and monitoring, I do not consider that the proposed development would have a significantly detrimental impact on the highway network or highway safety. The NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. I therefore see no reason to refuse the application on highway grounds

Ecology and Landscaping

133. The accompanying Preliminary Ecological Appraisal (PEA) identifies that the north area of the site, where the new building is proposed to be located, has low to medium potential to support species. The appraisal does not make any recommendations for further detailed surveys in this area, although it does state that the removal of any trees or hedgerows with potential to attract breeding birds is carried out outside of the bird nesting season. In the southern part of the site, where the new drop off / pick up feature is to be located, was assessed as having potential to support protected and notable species. Recommendations have been made to reduce the proposed development impacts on wildlife to ensure compliance with planning policy. The recommendations are detailed within the PEA report.

134. The County Council's Biodiversity Officer has assessed this additional supporting information and is satisfied that the proposed development would not have an adverse impact on protected species, subject to the imposition of conditions. Prior to and during

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construction a precautionary mitigation approach has been recommended for dormouse, badgers and breeding birds as set out within the Preliminary Ecological Appraisal document. Also prior to and during construction works, the habitat creation and reptile mitigation works within the Additional Ecological Assessment would be implemented as detailed and upon completion of the reptile mitigation works the grassland would be managed as detailed in the Proposed Enhancement and Mitigation Plan. Furthermore, a signed Impact Assessment and Conservation Payment Certificate signed by Natural England would be submitted to the County Planning Authority for written approval. No works would commence on site until the applicant has received the full District Level Licence. Finally, heras fencing is required to be erected around the retained reptile habitat and this needs to be included with the Construction Management Plan. Subject to the imposition of the condition outlined above, I am satisfied that the development would not have a detrimental impact upon protected species and/or their habitats.

135. The accompanying Arboricultural Report and Impact Assessment assesses the proposal to construct the new car park access road and the new car park behind the medical centre. As part of the landscaping works it is proposed to retain all Category A (trees of high quality with an estimated remaining life expectancy of at least 40 years) on this site. However, there is a need to remove 5no. Category B trees, 7no. Category C trees, and 1no. Category U tree. To mitigate the loss of trees and maintain levels of amenity and biodiversity, the applicant is proposing to plant new trees to the south and west of the proposed new pupil drop off/pick up car park area, so that there should be no net loss of trees and landscaping features across the site as a result of the proposed development. The implementation of the proposed landscaping scheme can be covered by condition.

External lighting

136. To ensure that the proposed new external lighting is appropriate for this site, details would be reserved by condition so that the type and position of any external lighting, including lighting of the buildings for security and wayfinding, and lighting of the car parking and access areas, can be controlled to ensure any potential nuisance from light pollution can be minimised. Details including the proposed time and days of operation and details of the timer and light sensors to be installed is requested. The lighting details should adhere to the Bat Conservation Trusts Bats and Lighting in the UK guidance and this can be addressed by condition.

Archaeology

137. The County Archaeologist has confirmed that the site lies within an area of archaeological potential and in particular for evidence of later prehistoric and Romano-British settlement. Evidence for this activity was recorded to the immediate north of the present development site and the potential is clearly set out in an archaeological desk-based assessment by Canterbury Archaeological Trust (Sevenoaks Environmental Consultancy Ltd.) submitted with the application. The County Archaeologist has concluded that in order to secure the appropriate level of evaluation and mitigation of archaeological potential at the site, a condition of consent should be imposed. It is requested that no development takes place until the applicant has secured the implementation of a programme of archaeological work in accordance with a written specification and timetable. I consider that the suggested condition would be an appropriate requirement in ensuring an acceptable level of evaluation and mitigation of the archaeological potential of the site. Therefore, subject to the imposition of the required condition, I do not consider that this proposal would have a detrimental impact on archaeological remains.

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Drainage and Land Contamination

138. The Environment Agency and the County Council's Flood Risk Team (SuDs) both raise no objection to this application subject to the imposition of conditions. The Flood Risk Team require the submission of a detailed Sustainable Surface Water Drainage Scheme and the further submission of details of the implementation, maintenance and management of the sustainable drainage scheme. Should permission be granted, the conditions as outlined above would be imposed upon the consent to ensure that drainage of the site was both sustainable and effective.
139. With regard to land contamination, the Environment Agency requests a condition be attached to any consent regarding how works should proceed should any contamination be found during construction. Therefore, should permission be granted conditions would be imposed addressing this matter.

Construction

140. Given that there are nearby residential properties, if planning permission is granted it would, in my view, be appropriate to impose a condition restricting hours of construction to protect residential amenity. I recommend that works should be undertaken only 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.
141. I also consider it appropriate that details of a Construction Management Strategy be submitted for approval prior to the commencement of the development. That should include details of the location of site compounds and operative/visitors parking, details of site security and safety measures, lorry waiting and wheel washing facilities, details of how the site access would be managed to avoid peak school times, and details of any construction accesses. Such a strategy would also address the pre-commencement condition required by Kent Highways with regard to the construction of the development. Therefore, should permission be granted, a Construction Management Strategy would be required pursuant to condition and the development would thereafter have to be undertaken in accordance with the approved strategy.

Sustainability

142. The applicant has confirmed that Meopham School was designed based on Department for Education (DfE) Output Specifications for May 2019. The energy approach adopted has been to adopt a fabric first approach whereby the thermal envelope of the building is enhanced to improve the overall energy efficiency of the building. The passive design measures are mentioned below. The scheme has been designed to improve upon Part L of the Building Regulations to increase the thermal insulation. The detailed design is to achieve an air permeability level of 5m³/m²/hrs to limit the heat loss through walls, floors, roof, windows and doors.
143. Furthermore, by maximising the window sizes, the applicant states to have effectively optimised the natural daylight into the spaces to limit the amount of artificial light and reduce the consumption of electricity. The scheme also uses natural ventilation to avoid the use of mechanical cooling; with the use of blinds to provide solar shade in the summer. The structural frame is to use Innovare SIP's (Structural Insulated Panels) system which uses sustainably sourced and certified timber. The SIPS system uses offsite production, which significantly reduces embodied CO² relating to transportation and less wastage.

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144. The thermal mass of the concrete at first floor and the roof would passively help heat and cool the building by using the concrete to absorb, store and release, giving night cooling. In the future, when the building is at the end of its life the concrete can be recycled. Additionally, an array of Photovoltaic (PV) panels are proposed to be installed on the flat roof to provide the school with energy generation for reducing their environmental impact. Originally, these panels were to be provided as a future phase of development, but as a result of negotiations through the assessment of this application, the applicant has confirmed that they would now be provided as part of the expansion works. There are also allocated electrical vehicular charging bays for the school's use and infrastructure for expanding the number of charging points.
145. Finally, Galliford Try site management would promote the following measures to reduce carbon emissions during the construction phase:
1. Use solar panel floodlights
 2. Switch off heaters and electrical equipment when office is not occupied
 3. Minimise wastage with correct storage and order the sufficient amount of material
 4. Stop machinery idling
 5. Attend meetings by video link to minimise travel
 6. All supply chain engaged would use timber materials that are sustainably sourced and timber certified

Conclusion

146. This proposal seeks planning permission as part of the Education Authority's Basic Need Programme for a 2 Form of Entry (2FE) expansion of the Meopham School, a non-selective secondary school in Gravesham Borough. It proposes the construction of a freestanding 2-storey teaching block to provide additional dedicated teaching and learning spaces, general and specialised teaching spaces and supporting facilities in addition to a music classroom, drama and dance studio and a main hall. The proposal also includes the provision of an additional 42 car parking spaces for staff, a school only car park including 4 accessible parking spaces and 4 electric vehicle charging bays with a further 8 spaces with passive charging provision to allow future conversion and a further 99 space car park and pupil drop off/pick up area, along with the widening to 2 lanes of the internal access road, and the creation of a bus only zone to separate buses from other traffic.
147. This proposal has given rise to a variety of planning considerations, including the need for very special circumstances to be demonstrated to justify inappropriate development in the Green Belt, and the impact of the development on the highway network, traffic and parking, design and the impact upon local amenity and biodiversity and an objection from Sport England. I consider that very special circumstances have been demonstrated in this particular case for overriding Green Belt policy constraints. 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 and the MOU outlined throughout this report, I consider that the proposed development would not have a significantly detrimental impact on the local highway network or highway safety, the amenity of local residents, nor biodiversity or sport interests. It is an appropriate design and would provide permanent purpose built accommodation for pupils. The proposal would accord with the principles of sustainable development as set out in the NPPF and Development Plan policy. The development would satisfy a recognised need for non-selective secondary school places in the Gravesham Borough area. There is very strong support for the provision of school places within the NPPF, the Planning Policy Statement for Schools and local planning

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policy and this planning consideration should be afforded significant weight in determining this proposal. Therefore, subject to securing the funding commitment in the MOU towards public transport provision and the Action Plan in the School Travel Plan and the imposition of conditions, I am satisfied that the proposed development would not give rise to overriding material harm and is otherwise in accordance with the general aims and objectives of the relevant Development Plan Policies and the NPPF.

148. Therefore, I recommend that the application be referred to the Secretary of State as a departure from the Development Plan on Green Belt grounds, and to consider the Sport England objection, and that subject to his decision, and the completion of the Memorandum of Understanding regarding the required monetary contribution for the School Travel Plan monitoring and Public Transport Capacity Improvements, permission be granted subject to conditions.

Recommendation

149. I RECOMMEND that the application BE REFERRED to the Secretary of State for Levelling Up, Housing and Communities as a departure from the Development Plan on Green Belt grounds, and to consider the Sport England objection, and that SUBJECT TO his decision, and SUBJECT TO the completion of a Memorandum of Understanding regarding the required monetary contribution for the School Travel Plan monitoring and Public Transport Capacity Improvements that PERMISSION BE GRANTED, SUBJECT TO the imposition of conditions covering (amongst other matters) the following:

1. The standard 3 year time limit;
2. The development carried out in accordance with the permitted details;
3. The development to be carried out using external materials and colour finishes as specified within the planning application documents, unless otherwise agreed;
4. The submission and approval of the details of the Photovoltaic PV panels and any roof plant.
5. Details of external lighting, including times and days of operation and details of the timer and light sensor to be installed;
6. Any lighting proposals shall follow the recommendations within the Bats and Artificial Lighting in the UK document produced by the Bat Conservation Trust and Institution of Lighting Professionals;
7. Prior to and during construction works the precautionary mitigation for dormouse, badgers and breeding birds within the Preliminary Ecological Appraisal (Sevenoaks Environmental Consultancy. April 2021) shall be implemented as detailed;
8. Prior to and during construction works the habitat creation and reptile mitigation works within the Additional Ecological Assessment (Sevenoaks Environmental Consultancy. May 2022) shall be implemented as detailed;
9. On completion of the reptile mitigation works detailed in condition 7 (above) the grasslands must be managed as detailed in the Proposed Enhancement and Mitigation Plan within the Additional Ecological Assessment (Sevenoaks Environmental Consultancy. May 2022) shall be implemented as detailed;
10. An Impact Assessment and Conservation Payment Certificate signed by Natural England shall be submitted to the County Planning Authority for written approval. No works can commence on site until the applicant has received the full District Level Licence;
11. Measures to protect the existing trees during construction;
12. The implementation and maintenance of the Landscaping Scheme,
13. No tree removal during the bird breeding season;

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14. No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of archaeological field evaluation works in accordance with a Written Scheme of Investigation and timetable which has been submitted to and approved in writing by the County Planning Authority and following on from the evaluation, any safeguarding measures to ensure preservation in situ of important archaeological remains and/or further archaeological investigation and recording in accordance with a Written Scheme of Investigation and timetable which has been submitted to and approved in writing by the County Planning Authority;
15. No development shall take place until a Construction Management Plan, including lorry routing, access, parking, construction vehicle loading/unloading and circulation within the site for contractors and other vehicles related to construction operations, measures to prevent mud and debris being taken onto the public highway, the erect of heras fencing adjacent to the retained reptile habitat, has been submitted for approval and thereafter shall be implemented as approved;
16. 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;
17. A minimum of 10% of the new staff parking spaces (excluding the drop-off / pick-up spaces) shall be provided with Electric Vehicle charging points. In addition, a further 20% of the new spaces (excluding the drop-off / pick-up spaces) shall be provided with passive service i.e. ducting / cabling only). Details and location of these shall be submitted and approved by the County Planning Authority prior to first occupation of the new buildings;
18. The annual review of the School Travel;
19. Travel Surveys of both staff and pupils to be undertaken annually in accordance with the submitted School Travel Plan (via the Jambusters website) and compared to the targets given. Any further mitigating measures, if the targets are not met, to be submitted to and approved by the County Planning Authority. Any identified shortfall in the bus services to be appropriately addressed in accordance with the submitted MOU regarding provision of bus services;
20. The Car Park Management Plan is to be monitored and reviewed annually as part of the annual School Travel Plan review;
21. The revised internal road layout and bus stopping / turning area to be completed prior to first occupation;
22. The proposed drop-off / pick-up area as shown on the submitted plans to be completed and fully operational prior to first occupation of the new buildings;
23. The submitted Car Park Management Plan to be reviewed annually in co-ordination with other on-site operators and any amendments to be submitted and approved by the County Planning Authority;
24. The car parking spaces as shown on the submitted drawings shall be provided prior to first occupation and shall thereafter be maintained for that sole purpose;
25. A minimum of 20 secure and weatherproof cycle parking spaces shall be provided prior to first occupation in accordance with details to be submitted to and approved by the County Planning Authority and shall be maintained thereafter, and with an area safeguarded on the site to allow for the future addition of further cycling parking, if required. The number of cycle parking spaces shall be review annually alongside the School Travel Plan and the number of spaces increased if necessary;
26. If, during development, contamination not previously identified is found to be present at the site then no further development unless otherwise agreed in writing with the County Planning Authority shall be carried out until a remediation strategy detailing how this contamination would be dealt with has been submitted to and

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- approved in writing by the County Planning Authority. The remediation strategy shall be implemented as approved;
27. No infiltration of surface water drainage into the ground is permitted other than with the written approval of the County Planning Authority. The development shall be carried out in accordance with the approved details;
 28. Development shall not begin in any phase until a detailed sustainable surface water drainage scheme for the site has been submitted to and approved in writing by the County Planning Authority. The detailed drainage scheme shall be based upon the Flood Risk Assessment prepared by CTP dated 13 January 2022 and shall demonstrate that the surface water generated by this development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm) can be accommodated and disposed of without increase to flood risk on or off-site;
 29. No building on any phase (or within an agreed implementation schedule) of the development hereby permitted shall be occupied until a Verification Report, pertaining to the surface water drainage system, and prepared by a suitably competent person, has been submitted to and approved by the County Planning Authority. The Report shall demonstrate that the drainage system constructed is consistent with that which was approved. The Report shall contain information and evidence (including photographs) of details and locations of inlets, outlets and control structures; landscape plans; full as built drawings; information pertinent to the installation of those items identified on the critical drainage assets drawing; and the submission of an operation and maintenance manual for the sustainable drainage scheme as constructed;
 30. Before the first use/occupation of the development hereby permitted, details regarding the proposed community use of the School's indoor sports facilities and school hall, shall be submitted to and approved in writing by the County Planning Authority, including type of use, hours of use, management of access by non-school users and use of the on-site car parking; and
 31. The removal of the temporary modular buildings related to the 2FE expansion.

150.Informatives

1. The applicant is required to obtain any necessary highway approvals.

Case officer - Lidia Cook	Tel No.03000 413353
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Background documents - See section heading
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