

Item D3

Construction of car park at St Lawrence Primary School, Church Road, Seal – SE/12/2144 (KCC/SE/0255/2012)

A report by Head of Planning Applications Group to Planning Applications Committee on 6 November 2012.

Application by St Lawrence School for construction of new car park (9 spaces) within a woodland area at St Lawrence Primary School, Church Road, Seal, Sevenoaks, TN15 0LN – SE/12/2144 (KCC/SE/0255/2012)

Recommendation: Permission be granted, subject to conditions.

Local Member: Mr N. Chard

Classification: Unrestricted

Site

1. The application site falls within the St Lawrence Primary School grounds, which are located approximately 200m to the north of Stone Street Village, and approximately 2.5km south east of Seal. St Lawrence School is a small primary school that serves the surrounding rural communities, accommodating approximately 75 pupils. The school grounds are split either side of Church Road, immediately to the south east of St Lawrence Church. The original school building dates back to the 1860's and is positioned, with other more recent extensions to the school, on the north east side of Church Road. The school's playground and playing field are located on the separate site within a wooded area to the south west of the public highway (Church Road).
2. The application site is located to the south west of Church Road within the wooded part of the school grounds, located between the public highway and the school's playing field beyond. The proposed site is rectangular in shape, measuring roughly 28m deep by 19m wide. The affected area includes an established maintenance access and dirt track that is used to reach the school playing field. The application site forms part of a larger woodland area available to the school and comprises mostly young regenerating silver birch, ash, beech and sweet chestnut saplings, with a small number of mature trees including a single mature English oak tree. The ground surrounding and beneath the trees is mostly bare earth and leaf litter with sparse brambles and other scrub.
3. Church Road is a typical rural lane, which connects Stone Street with Sevenoaks Road (A25), and is characterised by the surrounding woodland it passes through. The stretch of highway outside of the school leading down into Stone Street has a restricted speed limit of 30 mph. A Public Right of Way (SR 125) is located opposite the application site on the far side of Church Road. One residential property is located immediately to the south; other properties are positioned further to the south on the outskirts of Stone Street.
4. The application site and school grounds are designated within the Sevenoaks Local Development Framework as open countryside, within the Metropolitan Green Belt, and as part of the Kent Downs Area of Outstanding Natural Beauty (AONB). The woodland that surrounds the school grounds is known as Broadgate Cottages Wood, a large part of which

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is defined as ancient woodland and falls within the Oldbury & Seal Chart Site of Special Scientific Interest (SSSI), which is designated for ecology reasons.

Background

5. The recent planning history for the school site includes the following proposals granted permission by the County Planning Authority:

- SE/10/613 - Removal of external fire escape and erection of new 2 storey entrance hall. Construction of single storey lean-to structure incorporating WCs and small music room. Replacement of temporary timber reception classroom with permanent single storey structure. Construction of single storey timber link between new entrance hall and new reception classroom.
- SE/07/2397 - Extension of planning permission for temporary mobile classroom
- SE/05/1755 - Erecting a 2.4m high black weldmesh ball-stop fence to three sides of a tarmac play area.
- SE/05/2023 - Single storey extensions to existing hall.
- SE/04/1499 - Resurfacing existing netball court & laying an additional tarmac area to extend the court. Materials: tarmac on a hardcore base. Any surplus soil to remain on site.

The School undertook pre-application discussions with officers in advance of making the current application.

Proposal

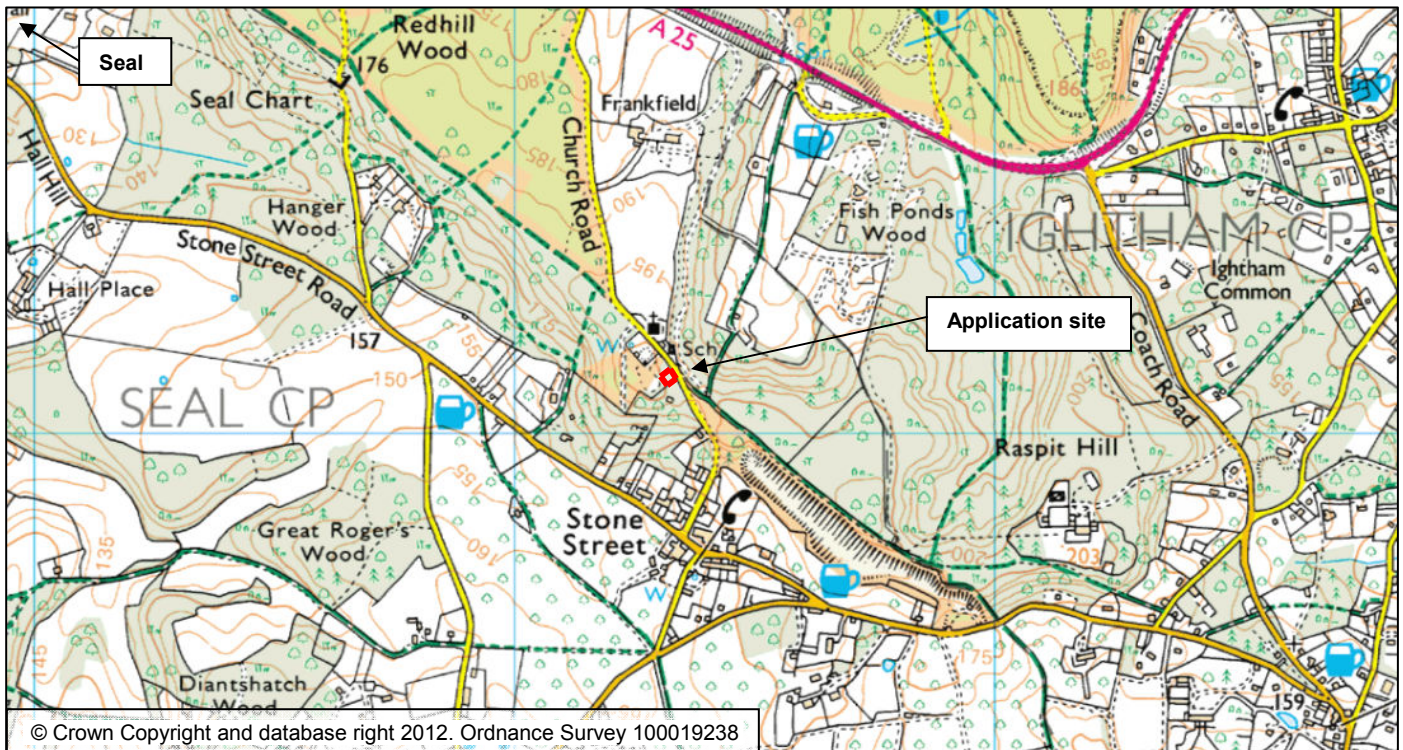
6. The application proposes the formation of a new car park to cater for staff at St Lawrence School. The proposal sets out 9 parking bays and manoeuvring space within the site which cover an area of approximately 240m². Access to the proposed car park would be gained direct from the public highway via an existing 5 bar field gate that forms a maintenance access to the planning field. The development of the site would require the removal of a number of saplings and regenerating broad-leaved trees alongside limited scrub and undergrowth. To form the necessary roadside vision splays, a small number of young trees within the highway verge would also be removed. The development allows for the retention of all established trees within the overall site area, including a mature English oak.
7. The proposal is designed to create a woodland car park effect, including the use of permeable base materials which would follow the existing site contours. A plastic grid paving system is shown to the front entrance. This is proposed to form a solid base to the entrance adjacent to the highway that would be over spread with top soil and grass seed to help minimise its visual impact. The fence line and access gate would be relocated 2.4m back from the public highway to provide adequate vision splays for vehicles leaving the site.

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The main car park area would be formed from a type 1 sub base covered by a layer of sand and a permeable membrane which would then be spread with shingle surface material. A topsoil and grass seed mix would be spread between the 9 parking bays to differentiate the spaces.

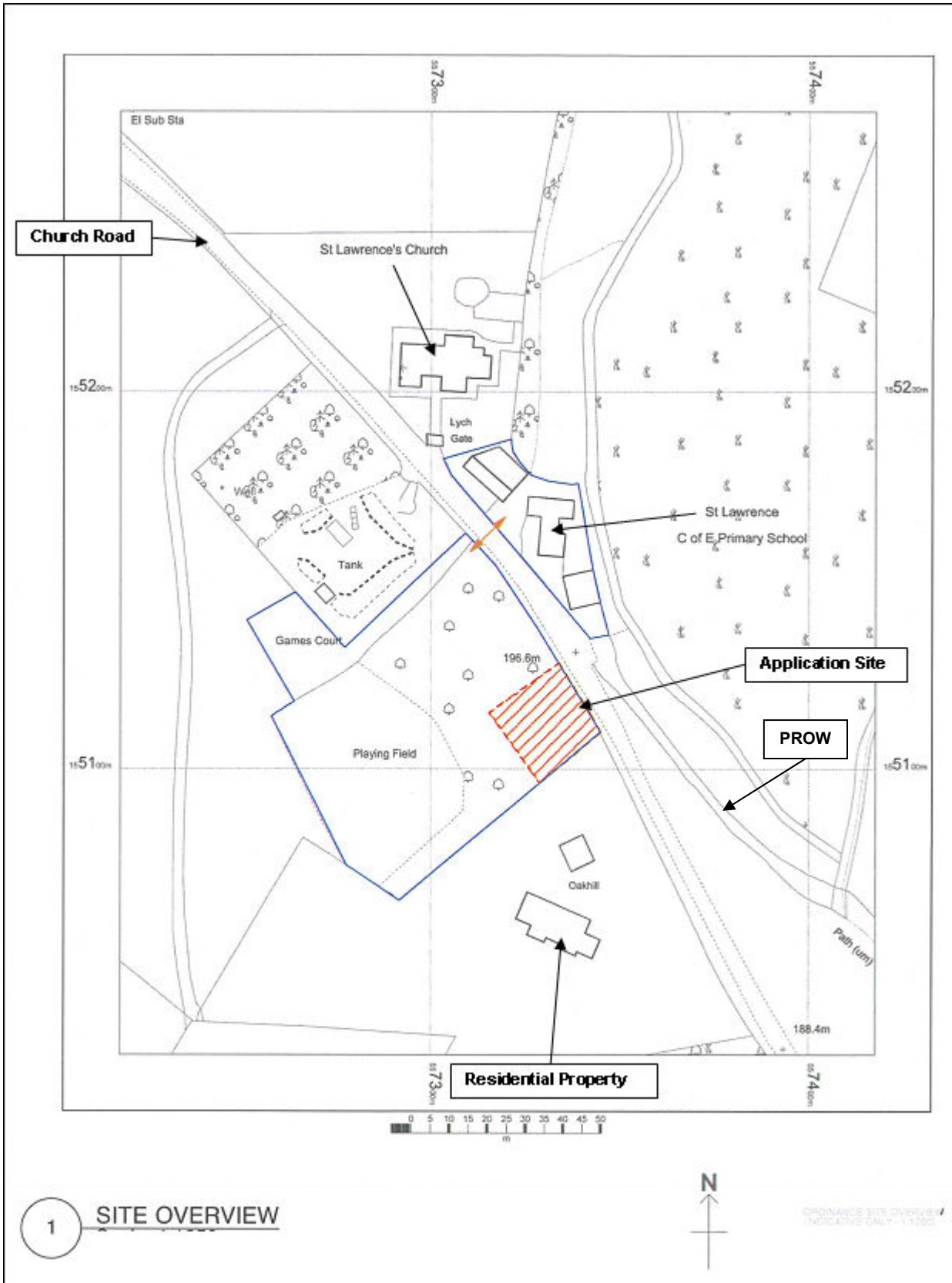
8. The application includes the provision of new timber post & rail fencing to the car park area, excluding the south eastern boundary with an adjacent residential property where the existing close board fencing would be retained. New native mixed hedges would be planted within the proposed fence line, facing the public highway and to the rear of the car park. The hedging is proposed to help compensate for the vegetation that would need to be removed and to help screen the car park area.
9. An extended phase 1 habitat survey is included with the application. The survey concludes that the ecological impacts of the development are not considered to be significant. To help mitigate for any impacts the application proposes habitat enhancement measures to include the provision of bat and bird boxes in suitable locations, together with a planting scheme to seek to re-establish the native bluebell within the woodland.
10. Following initial comments from the various consultees, the applicant undertook to amend the application in response to the recommendations being made. These changes included, amongst other matters, alterations to the proposed landscape scheme and the access arrangements to provide the recommended visibility splays. The revised application documents have been provided to consultees, and the attached layout plan sets out the development as amplified and amended.

General Location Plan



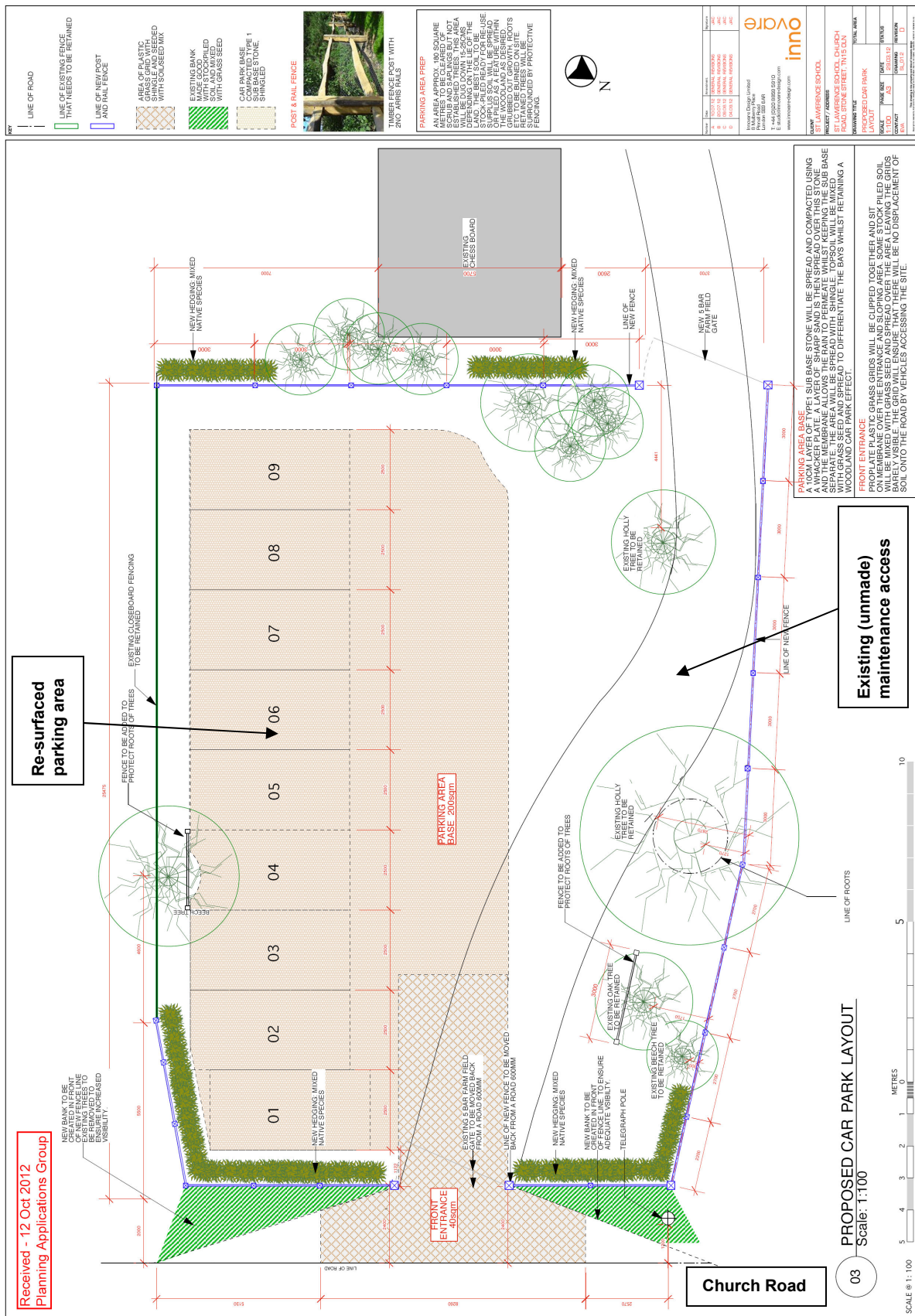
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Site Location Plan



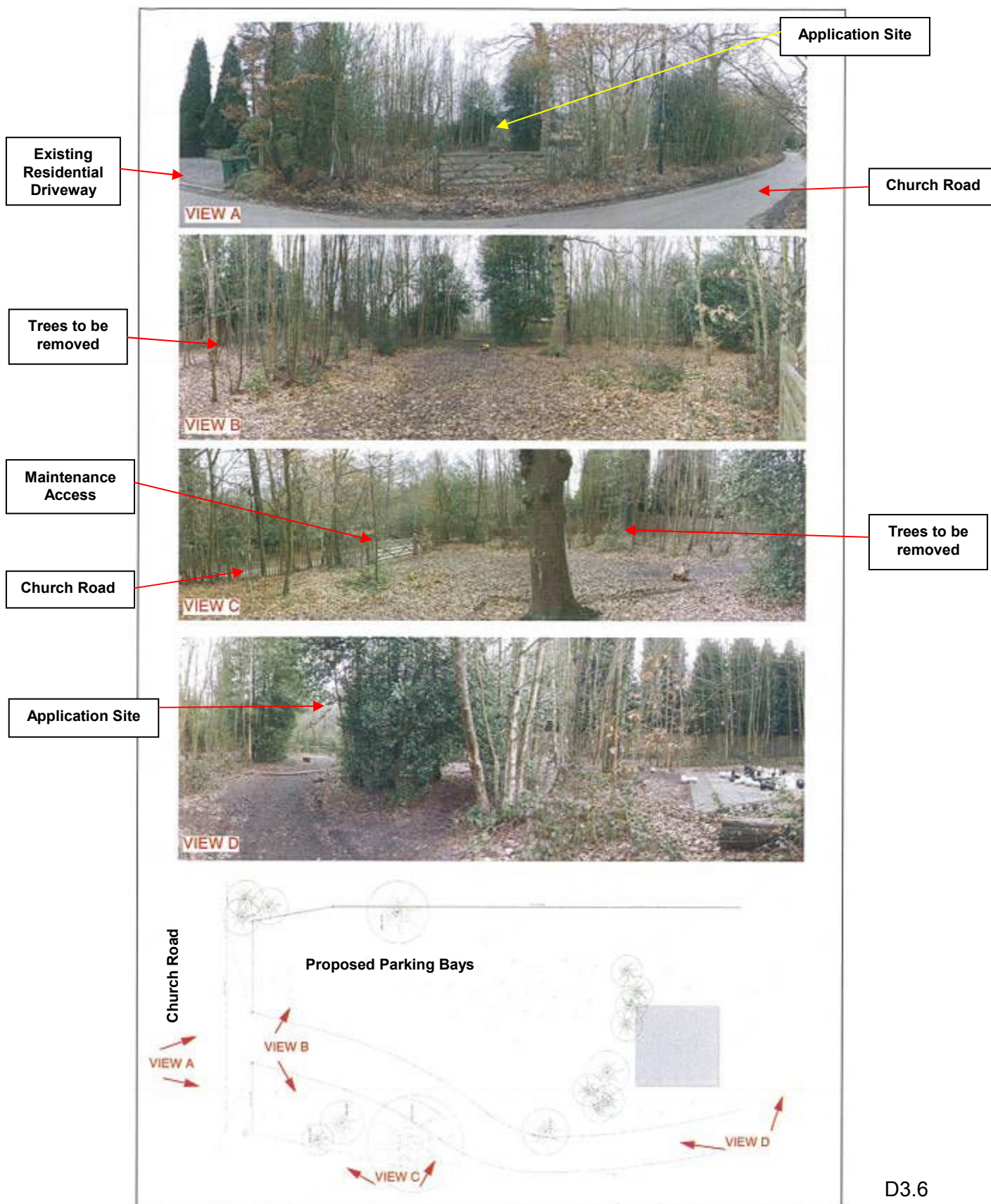
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Proposed Layout



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Site Photographs



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Planning Policy

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

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

National Planning Policy Framework (March 2012) sets out the Government's planning policy guidance for England and as guidance is a material consideration for the determination of planning applications. It does not change the statutory status of the development plan which remains the starting point for decision making.

The NPPF contains a presumption in favour of sustainable development, identifying 3 overarching roles in the planning system - economic, social and environmental, which are considered mutually dependent. Within the over-arching roles there are 12 core principles that planning should achieve. These can be summarised as:

- be genuinely plan-led;
- a creative exercise in finding ways to enhance and improve the places people live their lives;
- proactively drive and support sustainable economic development;
- secure high quality design and a good standard of amenity;
- take account of the different roles and character of different areas, including protecting Green Belts, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities;
- support the transition to a low carbon future, taking account of flood risk and coastal change and encourage the reuse of existing resources and the development of renewable energy;
- contribute to conserving and enhancing the natural environment and reducing pollution
- encourage the effective use of land by reusing brownfield land, providing that it is not of high environmental value;
- promote mixed use developments;
- conserve heritage assets;
- manage patterns of growth to make fullest use of public transport, walking and cycling; and focus significant development in locations which can be made sustainable; and
- take account of strategies to improve health, social and cultural well being, and deliver sufficient community and cultural facilities and services to meet local needs.

In terms of delivering sustainable development in relation to this development proposal, the following NPPF guidance is particularly relevant:

- Chapter 3 (Supporting a prosperous rural economy);
- Chapter 7 (Requiring good design);
- Chapter 8 (Promoting healthy communities);
- Chapter 9 (Protecting Green Belt land);

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- Chapter 11 (Conserving and enhancing the natural environment)

The Framework also requires that local planning authorities should look for solutions rather than problems. It states that those determining applications should seek to approve applications for sustainable development where possible.

(ii) Development Plan Policies

The adopted **South East Plan (2009)** Policies:

Policy SP5 Seeks to support and retain the broad extent of Greens Belts

Policy CC1 Seeks to achieve and maintain sustainable development in the region, including achieving sustainable resource use and ensuring the natural environment is conserved and enhanced.

Policy NRM5 Seeks to avoid net loss of biodiversity and actively encourage opportunities for net gain.

Policy NRM7 Seeks to ensure the value and character of the region's woodland are protected and enhanced, including protecting ancient woodland from damaging development.

Policy C3 Gives high priority to conservation and enhancement of the region's Areas of Outstanding Natural Beauty (AONBs) ensuring proposals do not conflict with the aim of conserving and enhance natural beauty.

Policy C4 Seeks to protect open countryside by ensuring all development respects and enhances local landscape character, securing appropriate mitigation where damage cannot be avoided.

Members will already be aware of the relevant South East Plan policy considerations in relation to the proposed development, in that The Plan was revoked and later reinstated pending the enactment of the Localism Bill. Members will also be aware that they have to have regard to the policies in the SEP and the Government's intention to abolish the Regional Spatial Strategies (RSS) as material considerations. However the weight to be accorded is a matter for the decision makers.

Sevenoaks Local Development Framework: Saved Local Plan Policies Compendium (2008) Policies:

Policy EN1 Seeks all new development to respect, conserve and enhance the surrounding environment, including the privacy and amenities of a locality, the topography, important trees, hedgerows and shrubs. Ensuring highway safety, a satisfactory means of access and provides appropriate parking facilities.

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Policy GB1 Seeks retention of the Green Belt as defined in the Proposals Map.

Sevenoaks Local Development Framework: Core Strategy (2011) Policies:

Policy LO1 Seeks to protect the rural character, Green Belt and Areas of Outstanding Natural Beauty.

Policy LO8 Seeks to maintain the Green Belt, conserve and enhance the countryside, the AONB and the special character of its landscape and biodiversity.

Policy SP1 Seeks new development to respond positively to distinctive local character, protect and enhance local environment.

Policy SP11 Seeks to conserve and enhance biodiversity. Sites designated for biodiversity value will be protected. Opportunities will be sought for the enhancement of biodiversity through the creation, protection, enhancement, extension and management of sites.

Consultations

12. Sevenoaks District Council: raises an objection for the following reasons:

The land lies within the Metropolitan Green Belt where strict policies of restraint apply. The proposal would be inappropriate development harmful to the maintenance of the character of the Green Belt and to its openness. The District Council does not consider that the special circumstances put forward in this case are sufficient to justify overriding advice held within The National Planning Policy Framework.

The land lies within an Area of Outstanding Natural Beauty (AONB). The proposal would not conserve the scenic beauty in the AONB. This conflicts with policy LO8 of the Sevenoaks District Core Strategy and advice held within The National Planning Policy Framework.

Seal Parish Council: raises an objection to the application for the following reasons:

The special circumstances required to justify overriding the protection afforded to the Metropolitan Green Belt and the AONB have not been demonstrated. The proposal will remove part of the school's area for outdoor activity which is considered inappropriate when there is a consensus for augmentation of these facilities. The creation of an additional access to the highway would compromise safety for the school children during busy periods at the beginning and end of the school day.

Kent Highways and Transportation: commented on the application (as originally received) recommending revisions to the proposed layout to improve visibility splays at the access onto the public highway. In response to this request the applicant has revised the layout accordingly. Kent Highways and Transportation have been consulted on this revised layout

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(see drawing attached above) and any final views on the application received before the committee meeting will be reported verbally.

Natural England – Standing Advice on protected species recommends that the Planning Authority ensure that appropriate surveys are carried out before determining the application. The application includes an extended phase 1 habitat survey that concludes there is limited potential for protected species impacts. On this basis, the advice recommends proceeding with the application subject to an informative covering what to do if protected species are found during development.

The County Council's Biodiversity Projects Officer – raises no objection to the application, subject to condition securing the biodiversity mitigation measures recommended within the habitat survey, and a condition covering tree protection measures during construction for those trees to be retained.

The comments received can be summarised as follows:

The *Extended Phase 1 Habitat Survey* received concludes that although the site is designated as ancient replanted woodland, there are limited ancient woodland features present. The proposed car park will not result in the loss of any mature trees, but “*regenerating broad-leaved species*” would be removed to facilitate development.

There has been a recent development with regards to the ancient replanted woodland status of the site, following a revision of ancient woodland presence within Sevenoaks District (2012). The section of woodland in which the proposed development is located has not been retained within the ancient woodland designation (although much of the surrounding woodland has been confirmed).

The proposed development site area has not been included as ancient woodland as a result of information from the 1830s title maps for Kent which indicate that the site has had a significant break/alternative use, such that it can not be said to have had ‘continuous’ (in the context of the ancient woodland definition) woodland cover since the 1600s.

We therefore advise that while consideration must be given to the loss of woodland habitat as a result of the proposal, this does not need to be considered in the context of the application “*resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland*” (NPPF).

Significant trees are to be retained in the proposals and ecological mitigation measures are proposed, including the use of native species in the landscaping of the hedgerows, a scheme to establish native bluebells and the erection of bat and bird boxes. We support these measures as they provide mitigation for the loss of the trees and will enhance the site and surroundings in keeping with the principles of the NPPF.

Local Member

13. The local County Member for Sevenoaks East, Mr N. Chard was notified of the application on 13 August 2012.

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Publicity

14. The application was publicised by the posting of a site notice, and the individual notification of 2 neighbouring properties.

Representations

15. In response to the publicity, 4 letters of representation have been received supporting the application, including one from the St Lawrence Church Council. The key points raised can be summarised as follows:

- Considers that the proposed car park would improve highway safety;
- Notes that the number of cars regularly parked on the highway presents a hazard and an obstruction to the vehicles travelling on the public highway, reducing the width of the road to a single lane in places, which can generate problems for service vehicles and problems with traffic flow at peak times;
- Notes that there are no public transport options close to the school, making car travel essential;
- On a normal school day cars park on the highway across the entire front of the school and church yard, which makes it difficult for members of the community that wish to attend the church during school hours;
- Considers that the car park would move staff vehicles off the public highway leaving more space for parents to drop off children safely and more space for visitors to the school and church when needed;
- Considers that fewer cars parked on the road would make a major contribution to the safety of children crossing the road between the school and its playing field and playground;
- Notes that the proposed car park area has few mature trees, none of which would be removed. Notes that the trees to be removed are mostly silver birch saplings that have grown up in recent years;
- Considers that the area affected is on the edge of the play space used by the School and would not impact on the education use of the site;
- Notes that an earlier application to create a playing field, tarmac playground, including improved access for vehicles to maintain the sports field, was considered acceptable on the school site within the AONB;
- Considers that the scheme would benefit not just the School but the community as a whole.

Discussion

16. The application seeks planning permission for the creation of a new 9 space car park within the St Lawrence School grounds. There are currently no on-site parking facilities for teaching staff at St Lawrence Primary School. All vehicles associated with the site park on Church Road in front of the school and the adjacent church. The proposal is being reported to the Planning Applications Committee as a result of objections received from Sevenoaks District Council and Seal Parish Council, on the grounds of the potential impact on the

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Green Belt and AONB (amongst other matters). In addition 4 letters of support were received from members of the local community (please see paragraphs 12 and 15 for details of all representations received).

17. In considering this proposal, regard must be had to the Development Plan Policies and Government Guidance outlined in paragraph (11) above. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that applications are determined in accordance with the development plan unless material considerations indicate otherwise. Therefore, this proposal needs to be considered in the context of the Development Plan Policies, National Planning Policy Framework, other Government Guidance and any other material planning considerations arising during the consideration of the application.
18. In my opinion, the key material planning considerations in this case can be summarised by the following:
- landscape and policy designation;
 - biodiversity and habitat considerations;
 - highways considerations; and
 - other material planning considerations.

Location and policy designation

19. The application site is designated as open countryside within the Metropolitan Green Belt, and as part of the Kent Downs Area of Outstanding Natural Beauty (AONB). Therefore any new development proposed in this location is subject to a number of Development Plan Policies and Government guidance that seek to protect and enhance the character and openness of the countryside. The broad thrust of these policies presumes against inappropriate development, subject to a limited number of exceptional circumstances.
20. The Development Plan Policies in place, include South East Plan Policies SP5, CC1, C3, C4, Sevenoaks Saved Local Plan Policy EN1, GB1 and Sevenoaks Core Strategy Policies LO1, LO8, SP1 all seek to protect the countryside from unnecessary development, preserve its openness and the special character of its landscape and biodiversity, particularly in relation to Green Belt and the AONB. Government Guidance is set out within the NPPF, including Chapters 9 (Protecting Green Belt land) and 11 (Conserving and enhancing the natural environment).
21. Policies relating to the Green Belt seek to safeguard the countryside from encroachment and preserve the open character of the landscape through a general presumption against inappropriate development. Chapter 9 of the NPPF (Protecting Green Belt land) confirms that the five purposes of the Green Belt are:
- to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

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The Framework states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

22. Paragraph 90 of the NPPF goes on to state that certain forms of development, which includes engineering operations, are not considered inappropriate in Green Belt provided they preserve the openness and do not conflict with the purposes of including land in the Green Belt (as set out above).
23. Both Sevenoaks District Council and Seal Parish Council consider that the development would be contrary to Green Belt policy, and do not consider that the special circumstances put forward in this instance are adequate to justify overriding the impact of the development on the character of the Green Belt. The District Council accepts that the proposal constitutes an engineering operation and as such could be considered appropriate development, however it considers the development would conflict with the purposes of including land in Green Belt and as such fails the requires set out in paragraph 90 of the NPPF. The District Council argues this on the grounds that the re-surfaced area of the car park would have a more formal appearance and that the intensity of the use of the site would increase significantly from an area of open woodland to a car park.
24. In this instance, I regard the development work proposed as comprising an engineering operation (required to create the new car park surface), and as such the development could potentially be considered 'appropriate development'. In my opinion, any impacts as a result of the proposal are likely to be marginal on the Green Belt's overall openness due to the development being essentially two dimensional (except for the re-placement fencing and planting). It should be noted that the locality is well screened from wider views by established woodland that surrounds the site. I consider that the proposal would continue to preserve the character of the Green Belt by virtue of the design approach being proposed and the small scale of the development. The proposed car park area would have very limited visual impact on its surroundings at a local level, which would be further minimised through the use of permeable surfacing (like crushed stone and the proposed plastic grid paving system). These types of materials have a more natural appearance and are less visually intrusive than a tarmac or concrete finish that tend to have a more urbanising visual impact. Whilst I acknowledge that the car park would increase use of the land, this would be intermittent (restricted to school opening hours) and would not introduce any additional vehicles to the area that do not already visit the site and currently park more prominently on the public highway. The site already includes an established maintenance access in this location, and the provision of replacement timber post and rail fencing and native hedge planting would (in due course) serve to screen the woodland parking from public view and help to maintain the rural character of the area. On these grounds, I consider that the development does not conflict with the purposes of including the land in the Green Belt and would therefore (as an engineering operation) be considered 'appropriate development' in Green Belt terms that does not require 'very special circumstances' to justify its consideration (in accordance with paragraph 90 of the NPPF).
25. Notwithstanding this, I believe that the 'special circumstances' put forward by the applicant in this instance to be more than adequate to demonstrate that the development is worthy of setting aside the conventional restrictions in the Green Belt. These circumstances would

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include the provision of off-street car parking for staff in support of the continued improvement of an important local community facility, improved highway safety on a narrow country lane through a reduction in the number of vehicles currently parked on the highway, improved pedestrian safety for pupils and staff crossing the road between the school sites, and improved access to the school grounds and the adjacent church, all of which would be of benefit to the wider community. Additionally, the limited impact on the openness of the wider Green Belt would bolster the very special circumstances case, if that was indeed the key test in this case.

26. The application site also falls within the Kent Downs AONB; development plan policies together with paragraph 115 of Chapter 11 of the NPPF (Conserving and enhancing the natural environment) require planning authorities to give great weight to conserving landscape and scenic beauty in Areas of Outstanding Natural Beauty. Government Policy suggests planning permission for major development in the AONB should be refused unless there are exceptional circumstances and where it can be demonstrated that the development is in the public interest. The guidance suggests that consideration should be given to the need for the development, the scope for developing elsewhere outside the designated area, and any detrimental effect on the environment and landscape, and the extent to which that could be moderated.
27. Whilst the District Council's formal comments suggest that the proposal would not (in its opinion) conserve the scenic beauty of the AONB, the District planning officers report on the application acknowledges that the development would conserve the overall landscape character through its location within a well screened wooded area. The report suggests that it would be necessary for the County Council to be sufficiently convinced by the case put forward by the applicant to agree that the circumstances outweigh any harm to the AONB.
28. I would argue that the proposals are considered minor development in the context of paragraph 115 of the NPPF and as such the consideration given to the overall impact on the landscape should be proportionate to the scale of the proposals. Notwithstanding this, I consider that the need for the development in support of the school as an important local community facility would be in the public interest. Given the nature of the proposals, there is no scope to locate the development outside the AONB as the facilities would clearly need to be close to the school to have any benefit. When considering any detrimental effects on the landscape, (as set out above) I would suggest that the development has been designed in such a way that would minimise the overall visual impact through the materials proposed and the screening that would be provided by the surrounding woodland. The removal of trees and scrub from the highway verge to form the necessary vision splays would impact on the character of Church Road at a local level. However, the design of the proposal includes measures to preserve the rural character of the lane, like the use of a plastic grid paving system which would be covered with topsoil and seeded to disguise the access, the provision of timber post and rail fencing and the planting of a mixed native hedgerow. I consider that the overall aesthetic impact of the proposals on the street scene are sympathetic to the character of the local area and would be less significant than the residential driveway that joins with Church Road, directly adjacent to the site. In addition to this, I also consider that the provision of off-street parking in this way would improve the overall rural appearance of the Church Road itself by reducing the number of vehicles that park on the road throughout the school day.

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29. I therefore consider that the application would be acceptable and accord with the provisions of the Development Plan Policies in place, together with Government guidance, in terms of its location within the open countryside, Green Belt and the Kent Downs AONB. This view is subject to a condition being placed on any planning permission ensuring the provision of the landscape scheme set out in the application, and to the further consideration of issues relating to the use of biodiversity, habitat and highway issues, together with any other material planning considerations within the sections below.

Biodiversity and habitat considerations

30. The proposed car park would impact on a small area of regenerating woodland within the school grounds. The extensive wood that surrounds the site is (in part) designated as ancient woodland, areas of which fall within the Oldbury & Seal Chart Site of Special Scientific Interest (SSSI). As previously indicated, the application proposes clearance of an area approximately 240m². The plant life that would need to be cleared comprises young regenerating trees (mostly silver birch) alongside a limited amount of undergrowth. Most of the surrounding ground is characterised by bare earth and leaf litter; part of the site also forms an unmade maintenance access. All existing mature trees within the car park area would be retained and incorporated into the proposed layout.
31. The application site was subject to an extended phase 1 habitat survey in May 2012. The survey did not identify the presence of any protected species or any ancient woodland communities. The report prepared concludes that whilst the area falls within an area of ancient replanted woodland, the ecological value of the site appears to have been significantly degraded by previous management practices. The report indicates that impacts in terms of ecology are not considered to be significant and would be limited to the loss of a small area of regenerating broad-leaved trees.
32. The County Council's Biodiversity Projects Officer has considered the application (as amended) and raises no objections, subject to conditions securing the mitigation measures proposed within the habitat survey together with tree protection measures during construction. Up until very recently the application site was considered to fall within designated ancient (replanted) woodland. The recent advice received from the Biodiversity Projects Officer, following a 2012 review of woodland habitat in Sevenoaks District, suggests that the application site has been reclassified and is no longer considered to form ancient woodland on the grounds that previous uses of the site have disrupted the habitat. The change in classification would seem to fit with the conclusions drawn by the habitat survey.
33. Given the limited impact on existing habitat, and that no veteran trees would be felled as a result of the proposals, I am satisfied that the provision of off-street car parking in support of an important local community facility is in the public interest and the benefits of the development would outweigh the potential ecological impacts. In compensation for the small amount of habitat that would be affected the application proposes replacement native hedge planting, a planting scheme to seek to re-establish the native bluebell within the woodland, together with the provision of bat and bird boxes to enhance the retained habitat.

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34. On the strength of the guidance provided by the County Council's Biodiversity Officer, I am satisfied that the mitigation measures proposed would be adequate compensation for the small area of habitat that would be affected. Subject to conditions securing mitigation measures and tree protection, I consider that the application is acceptable in the context of relevant development plan policies and government guidance in relation to biodiversity and habitat matters.

Highways considerations

35. Seal Parish Council has raised concern that the creation of an additional access on the public highway could compromise the safety of school children during the busy periods at the beginning and end of the school day. In response to this point that applicant has made it clear that the car park would only be used by staff on a day to day basis. Members of staff arrive before pupils in the morning and leave after pupils at the end of the day, thereby minimising any conflict during peak travel times. The applicant has confirmed that the only exception to this would be occasional use after school hours for parents' evening and open days.
36. Kent Highways and Transportation commented on the original application received recommending improvements to the visibility splays. In response to this request the applicant has amended the layout (as included above) to provide the recommended splays. The revised layout has been forwarded to Kent Highways and Transportation for final comment, any views received prior to the committee meeting will be reported verbally.
37. I note that the vehicle access onto the highway is already in use, albeit infrequently by maintenance vehicles. The proposals would increase this use by approximately 9 vehicles a day. I am content that the application (as amended) includes the provision of improved vision splays to the access in both directions. These improvements would be achieved by setting the fence and gate 2.4m back from the highway, and through the clearance of all trees and scrub on the verge within 15m splays. In my opinion, by removing staff vehicles parked on the public highway the proposals would actually help to reduce congestion and improve overall highway safety. A reduction in the number of vehicles that park in front of the school would also improve visibility for children and staff crossing the road between the school sites during the school day. Subject to no objections being received from Kent Highways and Transportation, I am satisfied that the development would be acceptable in terms of any highway considerations and would be in accordance with the relevant development plan policies.

Other material planning considerations

38. The Parish Council has raised concern that the proposed development would reduce the overall outdoor activity space available for use by the School. In response the School has confirmed that the outdoor space that would be retained within the playing field site (approximately 0.4 ha) would be more than adequate to meet the school's needs.
39. The application site is peripheral to the school grounds and currently includes a maintenance access to the playing field. The area is clearly not used as part of any formal sports or recreation activities on the site as the main playing field, playground and other play

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equipment is located deeper into the site. Given the proximity to the maintenance access road, the proximity to the public highway and the level of separation from the main play spaces on site, I cannot foresee that the area forms a meaningful part of the School's recreation space. Moreover, the School has agreed to develop a management plan for the remaining wooded area with the grounds to enhance the habitat and improve the interaction and use of this area by pupils. Given the overall size the playing field site, I am satisfied that the School would continue to have access to good quality outdoor recreation facilities, particularly for a school of its size.

Conclusion

40. The application has been considered in the context of the Development Plan in relation to its location set against the impacts of the proposal and the need for development. Given the nature of the proposals, I am satisfied that the new car park in support of the School would be an acceptable use in the open countryside, Green Belt and AONB, that would preserve the openness and character of the landscape. The application establishes that there would be no impact on protected species and that any impact on existing habitat would be minimal and could be adequately compensated for through the suggested mitigation measures. Subject to final comments from Kent Highways and Transportation, I am also satisfied that the development would be acceptable in highway terms. I therefore recommend that the proposals are considered to be in accordance with the Development Plan and relevant Government guidance, and that in my opinion there are no material considerations that indicate that the application should be refused.

Recommendation

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

- the development to be implemented within 5 years;
- the development to be carried out in accordance with the permitted details;
- tree protection measures for the mature trees to be retained;
- delivery and ongoing maintenance of the landscape scheme;
- implementation of biodiversity enhancement measures;
- measures to prevent mud and other debris being deposited on the public highway during construction; and
- the continued maintenance of the vision splays.

I FURTHER RECOMMEND THAT INFORMATIVES be added to the decision notice providing advice on what action is to be taken if protected species are found during development.

Case Officer: James Bickle	Tel. no: 01622 221068
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Background Documents: see section heading
