

New Special School, at Wrotham School, Borough Green Road, Wrotham – TM/08/2857

A report by Head of Planning Applications Group to Planning Applications Committee on 9 December 2008.

Application by Kent County Council Children, Families and Education for the erection of a new special school, parking, play area, landscaping and ancillary works, Wrotham School, Borough Green Road, Wrotham, Sevenoaks, Kent, TN15 7RD – TM/08/2857

Recommendation: Subject to the further views of Sport England, the application be referred to the Secretary of State for Communities and Local Government, and subject to her decision, permission be granted subject to conditions.

Local Members: Mrs V Dagger

Classification: Unrestricted

Members' Site Visit

1. A group of Planning Application Committee Members visited the application site on the 4 November 2008 to acquaint themselves with the proposals and the issues they raise. The Committee Secretary's notes of the visit are attached as appendix 1.

Site

2. Wrotham School site lies to the south of the M26 and east of the A227 Borough Green Road south east of the village of Wrotham. It is within the Metropolitan Green Belt and the Kent Downs Area of Outstanding Natural Beauty. The application site (an area of 1.04 hectares) is that part of the school site between the existing school buildings and the motorway and is bounded to the west, north and east by hedgerows and trees. It is currently an area of playing field used informally for recreation, which the applicant advises is surplus to requirements with there being sufficient open play space on the main playing fields to the east of the school buildings (see plan of playingfield sports pitch markings on page D3.3). To the west of the A227 there is an open field opposite the application site with a Public Right of Way along its northern boundary with the motorway. The proposed Borough Green and Platt Bypass which is safeguarded in the Local Plan crosses this field and includes a junction onto the A227 that encroaches onto the application site. A line of residential properties faces the developed part of the school site. There are two main accesses to the school site from the A227, one of which is to the south west corner of the application site. A site plan is attached.

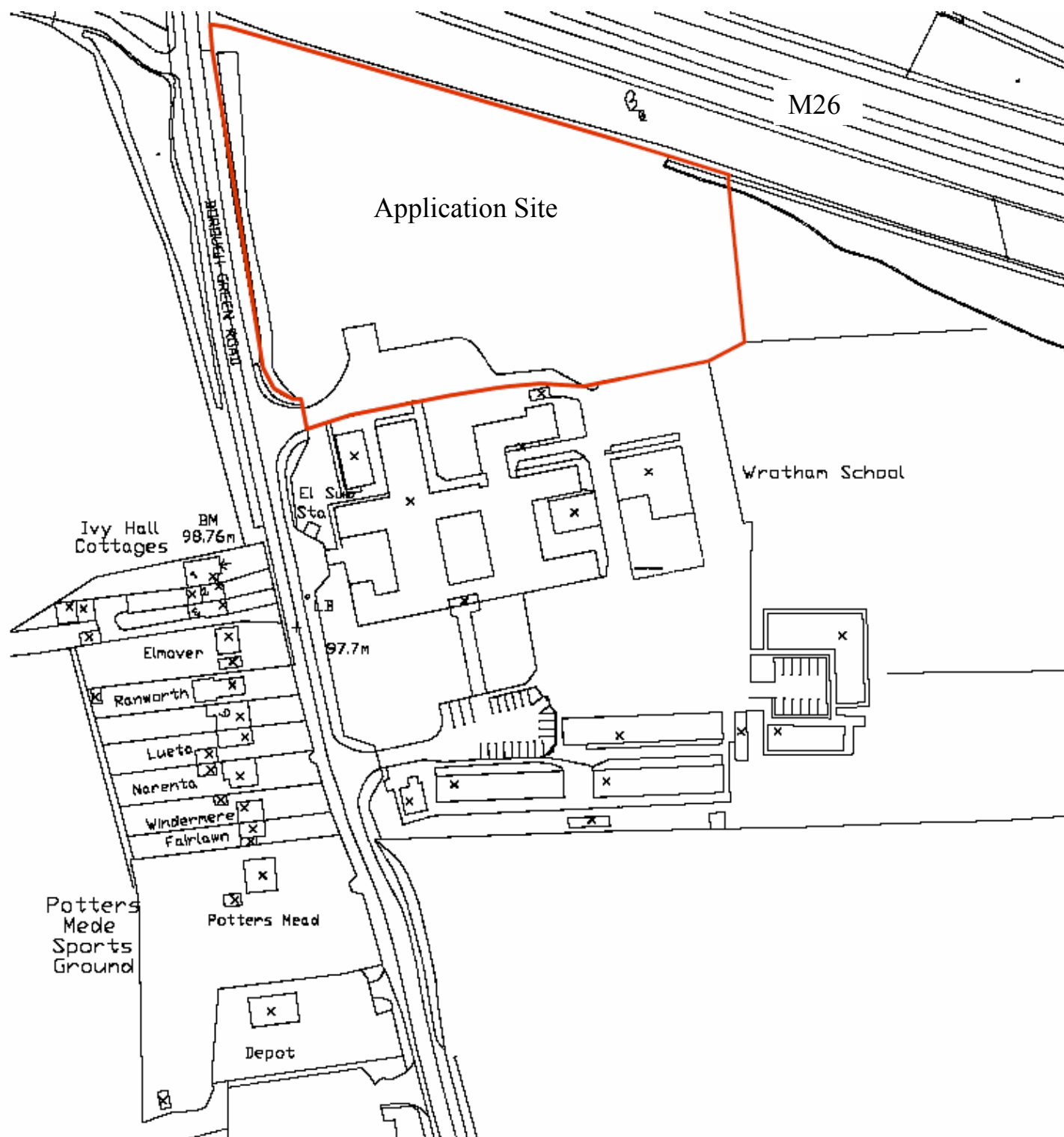
Background and Proposal

3. The proposal relates to the relocation of Grange Park School to the Wrotham School site. Grange Park School is a special school for young people with 'Severe Communication Needs associated with a combination of Autism and Severe Learning Difficulties', currently located at Leybourne Grange, also within the Borough of Tonbridge and Malling. It does also have joint working with other schools with post-16 pupils permanently at Holmesdale Technology College Snodland and working arrangements for the 11-16 year olds with Wrotham School going back a number of years.

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Site Location Plan



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Notes

The drawings are issued on the CSDP and CSDP system.
Do not scale drawings. Use figures dimensions only.
All dimensions are in metres unless otherwise stated.
The drawings and designs are the copyright of the architect.

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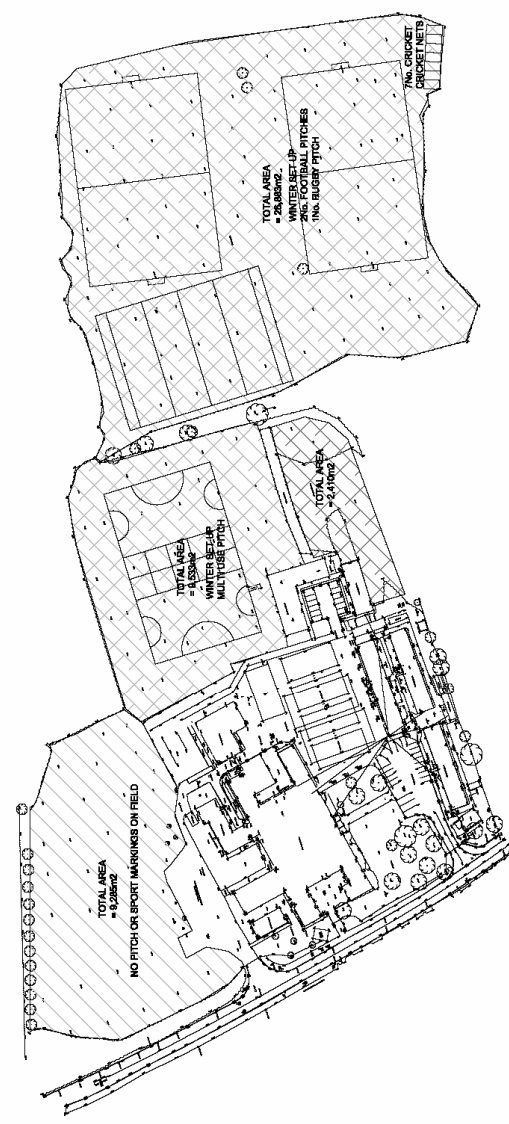
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SPORT PITCH MARKINGS DURING WINTER TERMS

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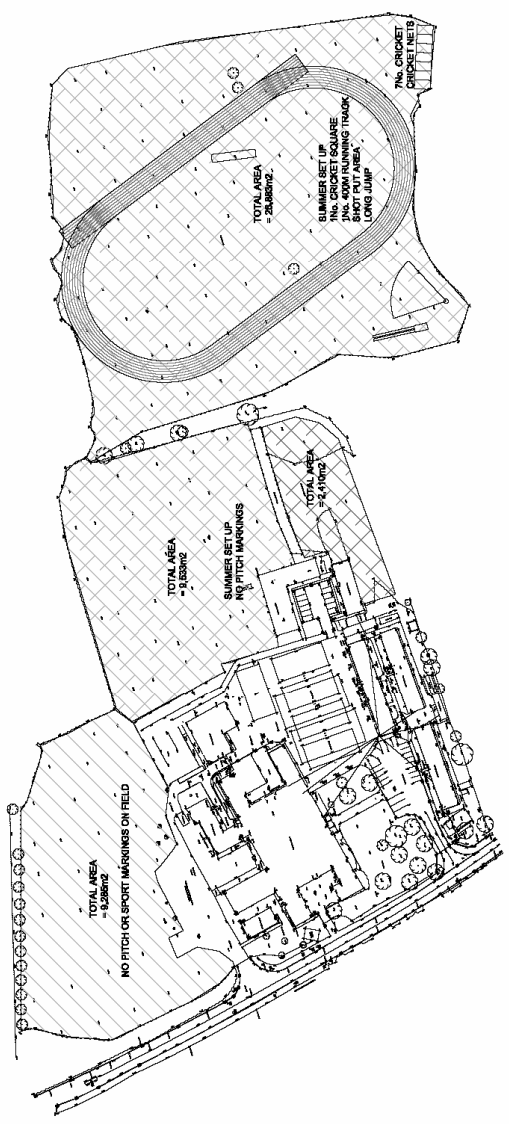
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SPORT PITCH MARKINGS DURING SUMMER TERMS



csdp architecture

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County Council Urban Design Partnership
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E-mail: info@csdparchitecture.com

Project title:
PROPOSED NEW SCHOOL
GRANGE PARK SCHOOL
ON
WROTHAM SCHOOL SITE

Scale: 1:1000

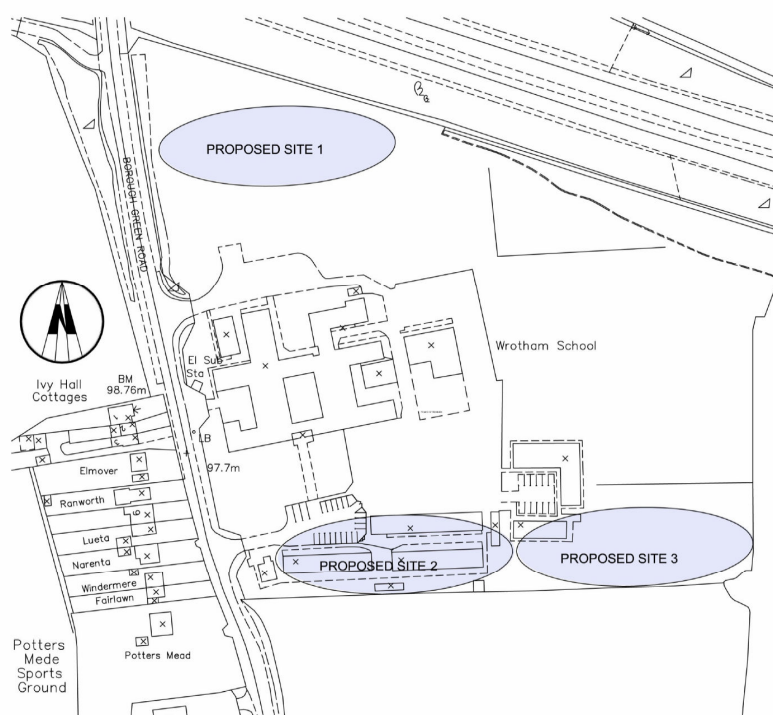
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EXISTING SPORT PITCH MARKINGS

Revision table:

No.	Revision notes	Date
REV A	CHANGES REQUIRED TO EXISTING PITCH MARKINGS ON THE PLANNED FIELD A/B	18.08.08

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4. The applicant states that the existing site is inadequate to meet the requirements of Grange Park School and the special needs of its pupils, all of which have Autistic Spectrum Disorder (ASD). As such, and following a detailed assessment of alternative solutions and potential relocation sites, Wrotham School was identified as the only suitable location, offering significant benefits associated with co-location curriculum provision.
5. Within the Wrotham School site, three options were considered as shown on the drawing below. The Site 1 option came forward as the preferred solution and therefore the subject of this application.



Site options
Drawing No. 2498.site options

6. The proposal includes the provision of a new single storey building with associated parking, play area, landscaping and other ancillary works. Access would be taken directly from the A227 as existing, with separate circulatory routes and parking provided for the new facility that would allow the relocated school to operate independently from Wrotham School whilst benefiting greatly from a fully integrated co-locational curriculum provision.
7. The design concept/approach is intended to reconcile both the requirements of the users and the constraints of the site. The single storey building is linear in format with curved facades facing north and south. The curved north face would be cut into the site slope and has a mono pitch roof rising out of the ground. The roof would be covered with grass and visually merge with the surrounding grassed areas and hedgerows. The south concave face of the building is a low rise combination of flat grass covered roofs with feature secluded/protected courtyards within and vertical faces clad with Kalwall (a translucent, high insulation, composite panel), high level louvre panels and render. The entire building would have a subdued, green colour finish with low visual impact and gentle colour rendering. The building would be

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naturally lit and ventilated avoiding air conditioning wherever possible. The north, convex shaped façade would act as a noise deflector and has been positioned so as to minimise the sound of the M26 traffic whereas the south façade is a light collector with minimal aspect to reduce external visual distraction of the children.

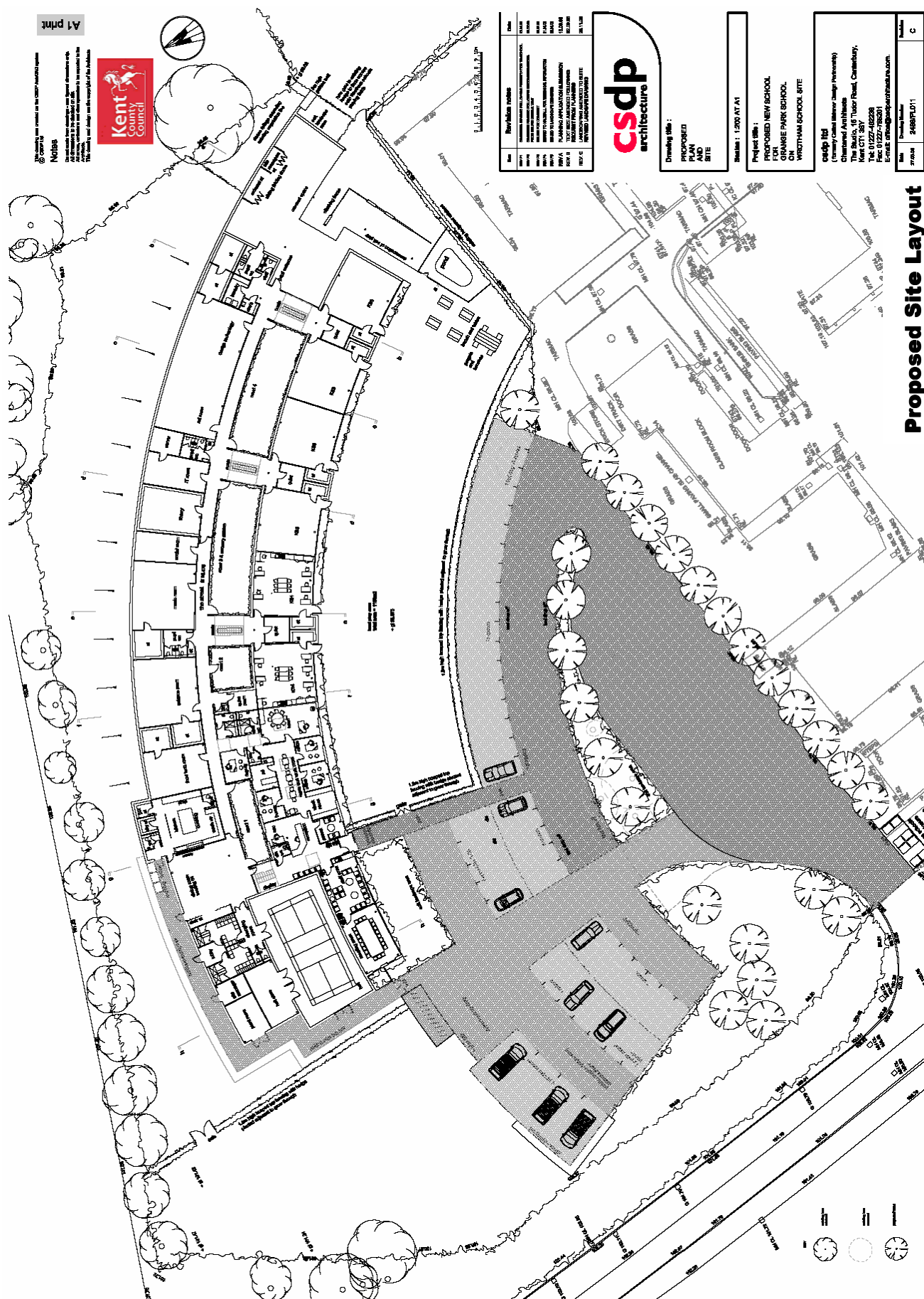
8. The building would accommodate 55 pupils with ASD aged 11-16, together with teaching staff. The area of building is about 2,075 square metres. A hard play area would be provided which is just under 1,200 square metres. The parking area would have 35 car spaces, 4 mini bus spaces and 3 people carrier spaces. In the morning and the afternoon 20 taxis would set down and pick up the pupils respectively. 4 parking bays would be provided together with a wider access aisle for the temporarily parked taxis.
9. The school main entrance would be accessed by a footway and the pupil entrance would also be accessed from this footway via the secure, playground area. Within the building a linear 'street' links both the main entrance and the pupil side entrance. The 'street' has the main entrance with communal spaces at the western end and the pupil entrance with 6 teaching home bases at the eastern end. The special subject teaching areas are arranged along the north side of the street and feature courtyards are provided to the south side of the street together with the individual entrances to the pupil home bases.
10. The northern side of the building/site would have a secure, meadow grassed area. The intention is that this grassed northern aspect displays no built elements/fixtures, and is not accessible to the pupils unless supervised by members of staff. The secure hard play area to the south of the building would be buffered from road traffic noise by the building; each home base has a door providing direct access to the hard play area.

Copies of drawings showing the proposed layout of the site, floor plan, sections and elevations, of the proposed development are attached below.

11. A landscaping scheme is included as part of the application. The general theme is to minimise the visual intrusion of the new building and associated facilities. To this end the existing hedgerows/trees would be retained and in part enhanced. However, 7 trees (originally 4) adjacent to the existing Wrotham School vehicle hardstanding area would be removed. These would be replaced with new tree planting alongside the vehicle hardstanding adjacent to the rear of Wrotham School. New hedgerows with secure metal hoop fencing would be provided to control pupil access within the site. This design approach means that barrier protection to the grass roof areas would not be necessary and the view of the school from the north would be that of just a sloping, grassed open 'field'.
12. The application is accompanied by a series of detailed reports that examine the potential impacts arising from the proposed development. These include:

A Planning Statement, Statement of Community Involvement (setting out consultation undertaken prior to submission of the application), Design and Access Statement, Green Belt Report, a Landscape and Visual Impact Assessment, a Tree Report, Site Comparison Tree Survey, Environmental Feasibility Report, Environmental Assessment Report, Sustainability Statement, Acoustic Assessment, Air Quality Assessment, Surface Water and Flood Risk Assessment, Statutory Undertakers Plant and Services Report, Land Contamination Report, Ground Investigation Report, Traffic Scoping Study, Transport Assessment, Ecology Scoping Survey, Great Crested Newt Survey and Cultural Heritage Desk Based Assessment.

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Wrotham – TM/08/2857**



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A1 print

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Notes

1. This drawing was prepared on the CSdp Architecture system.

2. All dimensions are in millimetres unless otherwise stated.

3. Dimensions to the centre of the wall unless otherwise stated.

4. Dimensions to the face of the wall unless otherwise stated.

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No.	Description	Date
001	PRELIMINARY DRAWING	10/01/08
002	PRELIMINARY DRAWING	10/01/08
003	PRELIMINARY DRAWING	10/01/08
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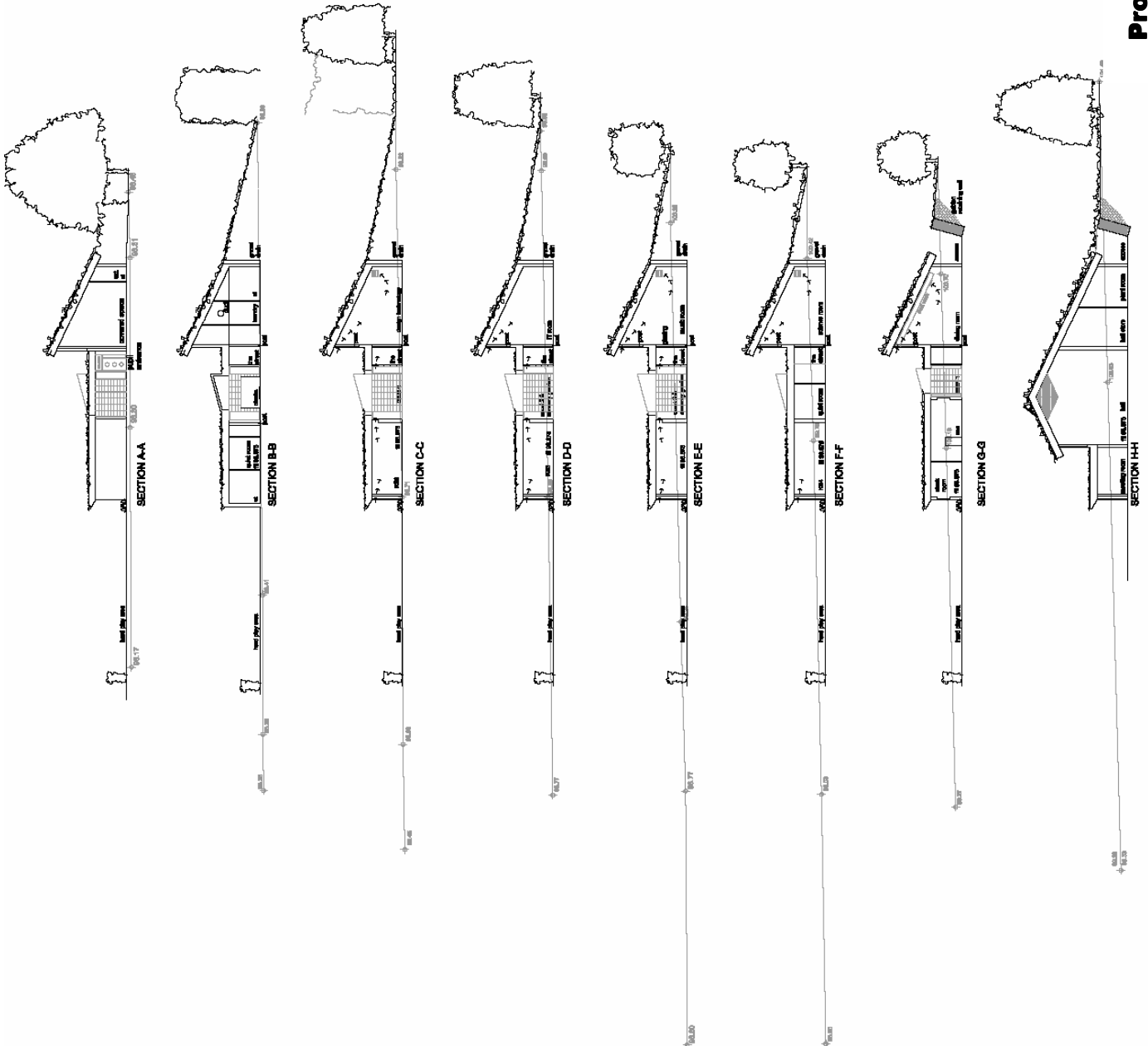
Drawing title:
PROPOSED
SECTIONS

Scale: 1:200 AT A1

Project title:
PROPOSED NEW SCHOOL
FOR
GRANGE PARK SCHOOL
WROTHAM SCHOOL SITE

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Chartered Architects
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Drawing number	240001010
Revision	A

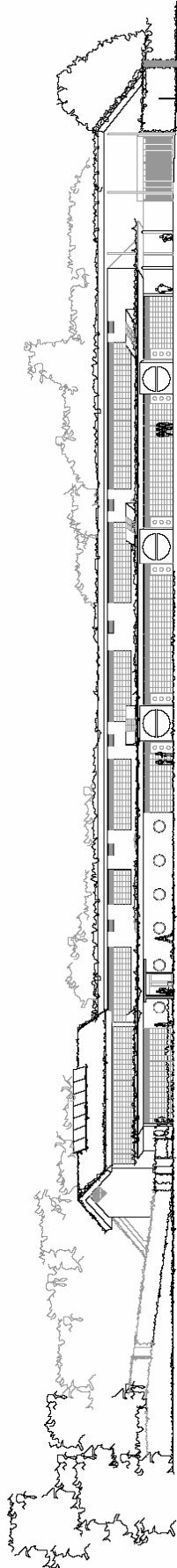


Proposed Sections

New Special School, at Wrotham School, Borough Green Road, Wrotham – TM/08/2857

At print

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south elevation

1 2 3 4 5 6 7 8 9 10 11 12



Ref	Revisions	Date
001	PROPOSED NEW SCHOOL FOR WROTHAM PUNK SCHOOL ON WROTHAM SCHOOL SITE	10/07/20
002	REVISIONS TO THE DESIGN	10/07/20
003	REVISIONS TO THE DESIGN	10/07/20
004	REVISIONS TO THE DESIGN	10/07/20
005	REVISIONS TO THE DESIGN	10/07/20
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007	REVISIONS TO THE DESIGN	10/07/20
008	REVISIONS TO THE DESIGN	10/07/20
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011	REVISIONS TO THE DESIGN	10/07/20
012	REVISIONS TO THE DESIGN	10/07/20



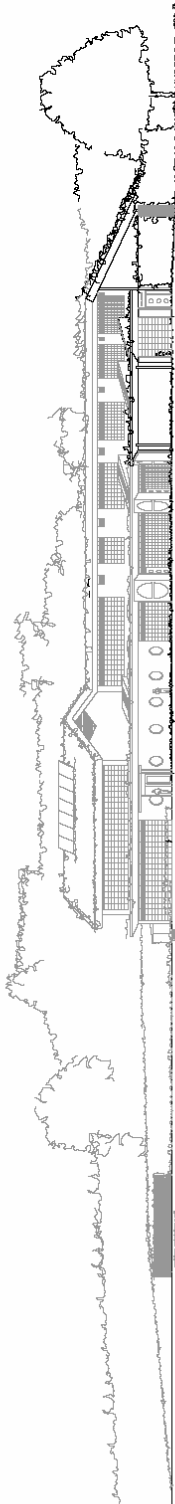
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PROPOSED
ELEVATIONS

Scale: 1:200 AT A1

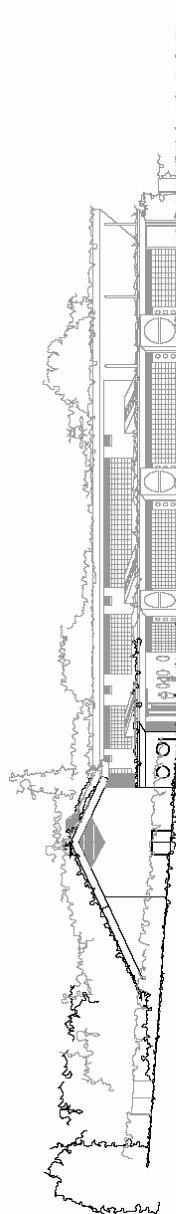
Project title:
PROPOSED NEW SCHOOL
FOR
WROTHAM PUNK SCHOOL
ON
WROTHAM SCHOOL SITE

Client:
Kent County Council
The School, 10 Tudor Place, Canterbury,
Kent CT1 1AB
Tel: 01227 442244
Fax: 01227 748071
E-mail: office@kentcouncil.gov.uk

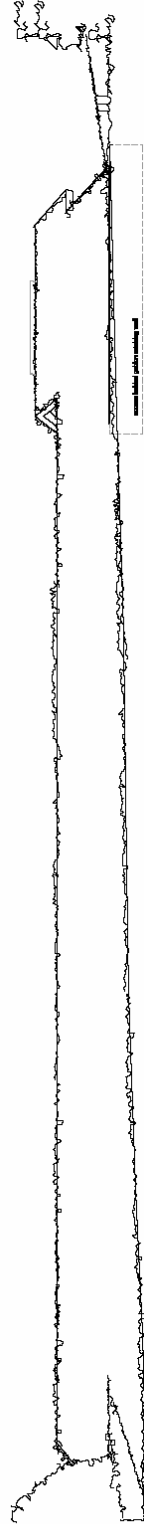
Date	Drawing Number	Revision
10/07/20	2488/PL1/17	A



south east elevation



west elevation



north elevation

Proposed Elevations

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Planning Policy

13. In ODPM Circular (11/2005), the Government's commitment to the principles of the Green Belt and to maintaining tight planning controls over development on Green Belt land has been reaffirmed. It is expected that all planning applications for development in the Green Belt be subject to the most rigorous scrutiny, having regard to the fundamental aim of Green Belt policy as set out in Planning Policy Guidance note 2 (PPG2); that is to prevent urban sprawl by keeping land permanently open. The openness of Green Belts is considered to be their most important attribute and therefore there is a general presumption against inappropriate development, which is by definition harmful and should not be permitted, unless it can be justified by very special circumstances.
14. The Government's Planning Policy Statement 7 (PPS7): Sustainable Development in Rural Areas sets out the policies applicable to rural areas. These include the need for strict control over development in the open countryside with the overall aim of protecting the countryside for its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife and the wealth of its natural resources, so it may be enjoyed by all. All development in the open countryside should be well designed and inclusive, in keeping and scale with its location, and sensitive to the character of the countryside and local distinctiveness. Nationally designated areas that include Areas of Outstanding Natural Beauty are confirmed as having the highest status of protection in relation to landscape and scenic beauty. The conservation of the natural beauty of the landscape and countryside should therefore be given great weight in planning policies and development control decisions in these areas. The conservation of wildlife and the cultural heritage are important considerations in all these areas. As well as reflecting these priorities, planning policies in Local Development Documents and where appropriate, Rural Spatial Strategies, should also support suitably located and designed development necessary to facilitate the economic and social well-being of these designated areas and their communities.
15. Planning Policy Guidance Note 17: Planning for Open Space, Sport & Recreation (PPG17) states that development proposals on existing open space and playing fields should not proceed unless an assessment has been undertaken that clearly shows the land to be surplus to requirements, accounting for all functions open space can perform. In such circumstances, public consultation and support will need to be shown. Where applications are made in advance of an assessment of need, subject to certain exceptions permission should not be allowed.
16. Planning Policy Guidance Note 24: Planning and Noise (PPG24) states that noise-sensitive development should not be permitted where exposed to unacceptably high levels of noise and identifies various mitigation measures that can acceptably limit such exposure. Those comprise engineering solutions, effective layout and administration of development.
17. The emerging **South East Plan**:
 - Policy CC10a Refers to Green Belts, supporting their retention.
 - Policy CC12 Advocates the conservation and enhancement of the character and distinctiveness of local settlements and landscapes, taking opportunities to create a high quality environment with an emphasis upon good design, innovation and sustainability.

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Policy C2¹ High priority will be given to conservation and enhancement of natural beauty in the region's Areas of Outstanding Natural Beauty (AONBs) and planning decisions should have regard to their setting. Proposals for development should be considered in that context. Positive land management policies should be developed to sustain the area's landscape quality. In drafting Local Development Documents Local Planning Authorities should have regard to statutory AONB Management Plans.

In considering proposals for development, the emphasis should be on small-scale proposals that are sustainably located and designed. Proposals which support the economies and social well being of the Areas and their communities, including affordable housing schemes, will be encouraged provided that they do not conflict with the aim of conserving and enhancing natural beauty.

18. The adopted 2006 **Kent & Medway Structure Plan**:

- Policy SP1 States that the primary purpose of Kent's development and environmental strategy will be to protect and enhance the environment and achieve a sustainable pattern and form of development.
- Policy SS2 Within the Green Belt there is a general presumption against inappropriate development.
- Policy SS8 Limits non-residential development in the countryside to a set of identified circumstances, which include the provision of a public facility for which a rural location is justified.
- Policy QL1 Requires that all development should be well designed and be of high quality. Developments, individually or taken together, should respond positively to the scale, layout, pattern and character of their local surroundings. Development which would be detrimental to the built environment, amenity, functioning and character of settlements or the countryside will not be permitted.
- Policy QL11 Protects existing community services, including schools, for as long as there is a demonstrable need for them.
- Policy EN1 Kent's countryside will be protected, conserved and enhanced for its own sake. Development in the countryside should seek to maintain or enhance it.
- Policy EN4 Protection will be given to the nationally-important landscapes of:
- the Kent Downs and High Weald Areas of Outstanding Natural Beauty; and
 - Kent's Heritage Coast between Kingsdown and Dover and between Dover and Folkestone.
- The primary objective in these areas will be to protect, conserve and enhance landscape character and natural beauty.
- Major commercial, mineral or transport infrastructure developments will not be permitted unless it can be demonstrated that:
- (a) there is a proven national interest
 - (b) there are no alternative sites available or the need cannot be met in any other way; and

¹ As set out in the Secretary of State's published Proposed Changes to the draft Regional Spatial Strategy July 2008.

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- (c) appropriate provision can be made to minimise harm to the environment.
- Other development which would be detrimental to the natural beauty, quality and character of the landscape and quiet enjoyment of the area will not be permitted. Development that is essential to meet local social or economic needs should be permitted provided that it is consistent with the purpose of Areas of Outstanding Natural Beauty and Heritage Coast.
- Policy EN9 Seeks to maintain tree cover and the hedgerow network. Additionally, states they should be enhanced where this would improve the landscape, biodiversity, or link existing woodland habitats.
- Policy NR1 Requires new development to make prudent use of natural resources, incorporating sustainable construction techniques and reducing greenhouse gas emissions.
- Policy NR5 The quality of Kent's environment will be conserved and enhanced, including the visual, ecological, geological, historic and water environments, air quality, noise and levels of tranquillity and light intrusion.
- Policy NR6 Development that would be sensitive to adverse levels of noise will not be supported where such conditions exist, or are in prospect, and where mitigation measures will not afford satisfactory protection.
- Policy TP12 Requires access to development sites to remain adequate in highways safety terms.
- Policy TP19 Development proposals must comply with the respective vehicle parking policies and standards adopted by Kent County Council and Medway Council.

19. The adopted 1998 Tonbridge and Malling Borough Local Plan:

- Policy P3/17 In considering proposals for noise-sensitive development (including offices, hospitals, schools and, in respect of noise emanating from non-transport related sources, housing), the impact of existing noise sources should be minimised through positioning of buildings and noise-sensitive rooms within buildings away from the noise source, through specific detailed design features and through the appropriate use of noise barriers. The applicant will be required to demonstrate that the proposal is not exposed to unacceptable levels of noise relative to the proposed use.
- Policy P6/22 Proposals for local community facilities outside the built confines of settlements will be permitted where they involve the reuse of existing rural buildings appropriately located to improve the social functioning of the settlement to which they relate and are otherwise acceptable in planning terms.
- Proposals for new buildings for such community facilities will not be permitted unless it can be demonstrated that:
- (1) no alternative accommodation is available either within the confines of the urban areas or villages, or through the conversion of existing buildings under the terms of Policy P6/14;
 - (2) the proposal is essential to serve the settlement to which it relates. Proposals within the Green Belt will be subject to Policy P2/16 (*amongst other policies superseded by Policy CP3 of the Tonbridge and Malling Core Strategy DPD 2007 over the page*).

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Policy P7/7g Safeguards amongst other road improvements the route of the proposed Borough Green and Platt Bypass as shown on the Proposals Map, stating that any development within safeguarded areas will not be permitted if likely to prejudice their implementation.

20. The Tonbridge and Malling Core Strategy DPD 2007

- Policy CP1 Seeks to secure sustainable forms of development including the protection and enhancement of the natural and built environment, and minimisation of waste, energy consumption water and the need to travel.
- Policy CP3 Refers to development within the designated Green Belt, stating that to the west of the A228, national Green Belt Policy will be applied.
- Policy CP6 Seeks to preserve the separate identity of settlements and the setting of settlements when viewed from the countryside. The policy supersedes previous Green Wedge policy that applied to the site.
- Policy CP7 Development will not be proposed in the Local Development Framework, or otherwise permitted, which would be detrimental to the natural beauty and quiet enjoyment of the Areas of Outstanding Natural Beauty, including their landscape, wildlife and geological interest, other than in the exceptional circumstances of:
- (a) major development that is demonstrably in the national interest and where there are no alternative sites available or the need cannot be met in any other way; or
 - (b) any other development that is essential to meet local social or economic needs.
- Any such development must have regard to local distinctiveness and landscape character, and use sympathetic materials and appropriate design.
- Policy CP14 Restricts development within the countryside to a number of specified circumstances. These include any development for which a rural location is essential, with any inappropriate development proposed within the Green Belt requiring very special circumstances.
- Policy CP24 Seeks to achieve a high quality environment through high quality, appropriate design.
- Policy CP25 Requires new development to be adequately served by community infrastructure and transport.

Consultations**21. Tonbridge and Malling Borough Council** raises no objection subject to the following:

1. Recommendations in Highway Assessment should be carried out as critical to safe operation of the site.
2. Any planning permission granted should require internal noise levels in teaching rooms not to exceed 35dB L_{Aeq T}, as required in the Building Bulletin 93 'Acoustic Design of Schools', through the use of appropriate glazing and acoustically treated louvered passive ventilation to the teaching rooms.

Wrotham Parish Council's comments are included in full in appendix 2. The Parish Council offers no objection to this proposal in the event that the following concerns are also addressed:

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1. The application is creating an extremely sensitive noise receptor in an inherently noisy location. Any planning permission granted should require internal noise levels in teaching rooms not to exceed 35dB L_{Aeq T}, as required in the Building Bulletin 93 'Acoustic Design of Schools'. In the event that this application is consented then any subsequent application that has the potential to increase noise and disturbance above this level would be unacceptable to the welfare of the children with Autistic Spectrum Disorder and be rejected.
2. Traffic calming / speed reduction measures are installed outside the multiple accesses to the two schools. An interactive visual indicator of the 30mph limit would be helpful in this respect.
3. An all weather pitch on adjacent Tonbridge and Malling District Council land is actively and financially supported to replace the sports facilities lost to the community.

Borough Green Parish Council has commented that whilst it does not have expertise in autism, it is concerned about the design of the school and its position on the site. It considers that the building would capture the traffic noise from the extremely busy A227 on which it is located, which may be detrimental to the young people. With this in mind it states that consideration should be given to changing the position/location of the building within the site to mitigate this effect of the buildings shape 'collecting' the noise generated by traffic passing on the A227.

The Environment Agency: raises no objection to the proposal subject to imposition of conditions relating to drainage, potential land contamination and protection of an existing pond on site. Also wishes to see a full drainage strategy to demonstrate that the development would not increase flood risk elsewhere, wishes to encourage ecological enhancement on this site and sets out some advice on waste management and pollution prevention during construction.

Natural England initially seemed to have some concerns about the effect of the development on the natural beauty, local character and distinctiveness of the AONB. However it has subsequently clarified that it has no objections to the planning application with regard to the AONB. It states that comments made in its letter are simply to bring attention to the Kent Downs AONB Management Plan and that reference be made to it for guidance when considering the application.

Natural England has made various observations and set out advice about the protected species considered in the detailed reports submitted with the application. It requests that the mitigation measures relating to the protection of the Great Crested Newts and proposals for ecological enhancements are secured by condition should planning permission be granted.

Sport England raises an objection to the application on the basis that the applicant has not demonstrated to its satisfaction that there is an excess of playing field in the catchment, or that the site has no special significance to the interests of sport. In addition the applicant is not proposing to replace the playing field lost and cannot therefore meet its policy in this regard.

Sport England states that they would be willing to reconsider this objection should further information be forthcoming which demonstrates that the proposal has the potential to meet with its adopted policy. It is currently considering further information provided by the applicant.

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The Highways Agency has no objection.

The Divisional Transportation Manager views are as follows:

Considers that the proposed parking provision more than adequate to serve this proposal and notes that it caters for a number of types of vehicle likely to visit the site. Also sets out the standard sizes for the different parking spaces proposed which the applicant needs to comply with.

Notes that it is proposed to use an existing vehicle/pedestrian access to serve the proposal and that it is considered satisfactory. Also comments that the existing school caters for 715 pupils and 84 staff and the additional traffic resulting from this proposal is unlikely to significantly impact on the current situation. Notes that the applicant has submitted accident data (personal injury accidents) obtained from KCC that shows that in the vicinity of the school there is not an accident record. Also that of the 17 incidents stated, 15 are located in the central area of Borough Green with the other two located to the north of the application site. States that he is therefore of the opinion that the nominal increase in traffic using this access is unlikely to unacceptably increase the potential for the risk of accidents.

Further comments that as part of the applicant's Transport Assessment (TA) the applicant has undertaken a review of the public highway in the vicinity of the application site. Also, that it raises a number of issues mainly in respect of the signs, lines and street furniture and suggests a number of recommendations. Notes that the applicant has stated that 'there would be virtue in the Highway Authority considering some minor improvements. Then notes that there are two recommendations in the TA relating to a minimum level of improvements that are not the responsibility of the Highway Authority. Comments that the trimming back/regular maintenance of the boundary hedge is the responsibility of the school to ensure that the public highway is not obstructed. Also that the improvements to the school junction are likely to include works within the school site and will be funded by them. States that, indeed 'The TA concludes that there are no movement issues that should preclude the proposed construction of the special needs school on the Wrotham School site'. Further states that he is of the opinion that the impact that this proposal is likely to have on the public highway is minimal and does not require that the works are conditioned as part of any approval. Considers that the review of the public highway would need a separate approach by Kent County Council and that it would need investigation, assessing and funding found.

Sets out the following advice relating to construction:

- On site facilities must be provided for the parking and turning of all contractors and suppliers vehicles along with on site wheel washing facilities.
- No deliveries be made from the public highway.
- The public highway must be kept clean of mud and debris occasioned by the works. The use of the vehicle access from the public highway for construction access and deliveries must not be used during the school AM drop off and PM collection times unless work is programmed outside of the school term.
- The protection of all pedestrian movements within the site must be maintained at all times.

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Concludes by stating that he would support this proposal subject to conditions securing on site parking and turning and informatives regarding the requirements during the construction phase.

Air Quality Consultant comments that the Air Quality Strategy sets out objectives for the main health concerning air pollutants in the UK. Notes that the air quality assessment presents pollutants concentrations in the proximity of the proposed school to be well below the Air Quality Objectives. Also notes that construction dust is unlikely to cause any nuisance following the implementation of control measures. Therefore, does not consider that air quality is an overriding issue in the determination of the planning application.

Noise Consultant comments that the appropriate guidance documents have been used and appropriate criteria adopted for the acoustic assessment. Validated software has been used for the prediction of noise levels from nearby roads (*i.e.* M26 & A227). The general conclusion of the appraisal is agreed. However, considers that noise levels for the bulk of school hours would be in the order of 1dB higher than those determined in the assessment. Also that as calculations were based on traffic flow data for the existing situation consideration should be given to potential increases in noise levels due to future developments. Taking these points into account would lead to marginally higher levels than those detailed in the appraisal. Concludes however that the differences would probably not be perceptible, but should be borne in mind during detailed design, particularly for the specification of the ventilation units and consideration of additional screening of external areas.

County Landscape Adviser whilst in principle has no objection to the proposal, makes the following recommendations:

- Full maintenance specifications for the external, courtyard, and roof planting should be submitted for review.
- The applicant should ensure that the tree protection measures are put in place as described in the submitted Tree Report prior to any works commencing on site to protect the existing vegetation throughout the construction period.
- Consideration should be given to the future health of the largest tree to be retained within the central car park planting area. Removal and replacement tree planting should be considered if this tree's future health is in jeopardy.
- The applicant should review the spatial relationship between the planting and the structure to ensure the long term viability of the planting within the courtyard areas.
- The applicant is asked to consider adapting the north-west corner of the site to provide a suitable space for supervised outdoor use by the children if possible.

The County Archaeologist views are awaited.

Kent AONB Group views are awaited.

CPRE views are awaited.

Local Member

22. The local County Member, Mrs Valerie Dagger, was notified of the application on the 10 September 2008.

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Publicity

23. The application was publicised by advertisement in a local newspaper and the posting of site notices, which noted that the application was a departure from the Development Plan in view of the site's location within the Metropolitan Green Belt. 14 residential properties in the vicinity of the school were also notified of the application.

Representations

24. No representations have been received.

DiscussionIntroduction

25. Although the existing use of the land to accommodate school buildings and activities is well established there are a number of issues arising from the proposed development, particularly those relating to Metropolitan Green Belt, the Area of Outstanding Natural Beauty and playing field provision. In addition there are other considerations including those relating to design, transport and access, traffic generated noise from the adjoining highways, air quality, drainage, ecology, archaeology, residential amenity, construction of the development, external lighting and the proximity of the proposed Borough Green and Platt Bypass. These matters have to be considered in the context of the Planning Policies, referred to in paragraph 13-20 above, and other material planning considerations arising from consultation and publicity, and are discussed below.

Green Belt considerations

26. It will be noted that the whole of the school site is within the Metropolitan Green Belt. The principal policy guidance on development within the Metropolitan Green Belt is in PPG2 and is reflected in the relevant development plan policies set out in paragraphs 18-20 above. Within this context, it is necessary to consider whether or not the proposal involves inappropriate development, 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.
27. The applicant has submitted a detailed report (with supporting appendices) specifically to address the application of Green Belt policy to the proposed development. It acknowledges that within the context of PPG2 the proposed development would be 'inappropriate development' and very special circumstances would need to be established to justify the proposed relocation of Grange Park School to the application site. It also acknowledges that PPG2 states that very special circumstances will not exist unless "the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations." The report therefore considers whether very special circumstances exist in this instance, related primarily to need, the extent of harm arising from the development and availability of a suitable alternative way of addressing the need without developing Green Belt land and not addressing the need at all. In accordance with PPG2 the report also assesses the application proposals in the context of the impact of the development on the openness of the Green Belt. The report highlights that there is no policy guidance on very special circumstances. It suggests relevant professional commentaries provide some consistency in the way, for example, the Planning Inspectorate approaches the issue, that the range of potential

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circumstances is wide, that they are normally manifested in a combination of materially important needs which cannot be met by other means. Also that the absence of harm can itself be a very special circumstance.

28. The report goes on to consider the need for the school and issues surrounding the existing school and location. In summary the report states that:

“The existing school is unsuitable for the purpose of ASD education provision, falls below accepted DFES design standards and is isolated.

The School is in the middle of an active comprehensive redevelopment site. Existing and future disruption to the pupils’ education is unacceptable. Safety issues are problematic.

Co-location with an existing School is absent, when for good educational and practical reasons it should be on an existing mainstream school campus.

Grange Park School is an established part of the Education Authority’s planned provision of severe ASD school provision in the Special Schools Review covering West Kent and part of Mid Kent. It has reasonable journey times for pupils and split site management that must not be increased unduly.”

29. The report considers five alternative responses to the identified need, as follows:

1. Closing Grange Park School and relocating the pupils
2. Doing nothing
3. Refurbishing the School on its current site
4. Redeveloping the School on its current site
5. Relocating the School to a non-green belt site. This involved identification and consideration of nine non-KCC sites and six KCC sites within an area of search appropriate to the area of Kent to be served. Seven of the sites were discounted as they were in the Green Belt. The applicant states that they all raise the same Green Belt policy issues as are being considered in the light of the very special circumstances case and none have any balancing suitability by being adjacent to or within a suitable existing school community. None of the remaining non-Green Belt sites was considered suitable for a variety of reasons.

30. Following examination of these five alternative means of avoiding development on Green Belt land the report concludes, in summary, that: (1) Complete closure of the school and dispersal of the pupils is not acceptable due to a lack of appropriate alternative provision for the education of pupils with severe Autistic Spectrum Disorder (ASD). The school is one of only two dedicated severe ASD schools in the County and part of the Education Authority’s planned provision in the Special Schools Review covering West Kent and part of Mid Kent. (2) The ‘do nothing’ option is unacceptable because the existing facilities fall below DFES design standards, the site is isolated and is within an active comprehensive redevelopment site. (3&4) On-site refurbishment/extension or on-site redevelopment is impractical, the site is isolated, is within an active comprehensive redevelopment site, the playing fields are remote, the site is too small and would not meet long-term needs. (5) A study of available alternative sites in the relevant area required in the Special Schools Review shows that no site can provide the co-location necessary and at the same time avoid Green Belt land.

31. Given the lack of alternatives that can meet the requirements the report then sets out four principle reasons for considering Wrotham School as a relocation site for Grange Park School, as follows:

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1. Wrotham School is a co-location opportunity. These opportunities are relatively rare and it is fortuitous that the two schools already have links going back a number of years.
 2. It is also reasonably close to Holmesdale Technology College at Snodland where post-16 pupils (currently 15) of Grange Park attend on a permanent basis.
 3. It is well related to the Grange Park pupil catchment.
 4. Wrotham School has a surplus of land and is able to accommodate the buildings and external areas/facilities required for both schools in accordance with the appropriate guidance and statutory requirements.
32. As the openness of the Green Belt is of prime importance three siting options were considered around the existing Wrotham School buildings. These are as follows, and as shown on page D3.4 above.

Site 1 (the application site) the sloping playing field area between the school and the M26.

Site 2 the site of two existing horsa huts (classrooms).

Site 3 a former farm area on open land to the east that includes one classroom.

Each of these was assessed against detailed criteria under broader criteria covering site access, site identity, site aspect, external area impact, site constraints, and building procurement. Taking into account the detailed appraisal of the constraints and opportunities of the three options, the Site 1 option came forward as the preferred location within the Wrotham School.

33. The report then considers how having selected the site the design proposed for the development seeks to mitigate the harm which (by definition) inappropriate development has upon Green Belt according to established policy in PPG2. The report states that the architects' design for the development in addressing the issue of encroachment into countryside and the attribute of openness takes account of the following:

Natural Enclosure the existing A227 and M26 hedgerows remain untouched as the site is large enough to accommodate the school and there is an existing reasonably enclosed access to it.

Use of Topography the building is excavated into the rise so that views from high land to the north are of a roof; in this case a green roof to blend in to the existing field setting.

External Functions a limited parking area and a hard play area are partly shielded by being sited close to the south (open) side of the building.

Orientation the active side of the building faces on to the existing drop-off area and the Wrotham School buildings so that the visible elements of the new school face existing activities and are enclosed to the south by substantial school buildings. This also allows for the utilisation of the existing vehicular and pedestrian access from the A227.

34. It is nevertheless acknowledged in the report that direct views to the new school would be available though over a short distance of the A227 through the site access; that this is likely to be the most significant viewpoint (noting that filtered views would also be

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available through the frontage hedgerow in winter*) signalling that development exists on what would have been open space. Also that the context for such views would nevertheless be the enclosing hedgerows, the existing school buildings positioned in the centre of the site and the M26 and its bridge to the north. (**Views would also be available from the Public Right of Way opposite particularly in winter.*)

35. The applicant's conclusions are that whilst the proposal represents inappropriate development in terms of PPG2, the established need, lack of suitable alternatives and lack of harm arising outweigh the policy presumption against inappropriate development. As such, it considers the application accords with PPG2 and Development Plan policy regarding development within the Metropolitan Green Belt.
36. Additionally the applicant considers, the siting of the proposed building, contained to the north by the M26 motorway and the south by the existing Wrotham School development, safeguards the openness of the Green Belt. Given the significant physical built feature that the trunk road represents, it considers that the proposal would not unduly extend built form into the countryside and would thus maintain the openness of the area, further mitigated by the innovative, single storey design proposed.
37. Overall, I accept the applicant's assessment and application of Green Belt Policy set out in the submitted report, as summarised above. The development would clearly be inappropriate development and by definition harmful. Nevertheless, in my view, the considerations summarised above are sufficient collectively to constitute very special circumstances capable of outweighing harm, by reason of inappropriate development arising from the construction of the new school, in this particular case. Furthermore, even though arguably the development has the potential to significantly impact on the openness of the Green Belt because of the extent and the built form of the development, I accept that the particular siting and design of the development would largely mitigate this impact. Accordingly I do not consider that an objection on Green Belt grounds would be warranted. However, if Members were minded to grant permission, the application would have to be referred to the Secretary of State for Communities and Local Government for consideration under The Town and Country (Green Belt) Direction 2005. The impact of the development on potential harm to the landscape per se is dealt with below

Landscape and Visual Impact

38. The site is located within an Area of Outstanding Natural Beauty (AONB) as acknowledged elsewhere in the report and therefore its landscape is subject to strong planning policy protection. Principally, that includes Structure Plan Policy EN4, Tonbridge and Malling Core Strategy Policy CP7 and emerging South East Plan Policy C2, set out in full in paragraphs 17 – 20 above, which are underpinned by PPS7 referred to in paragraph 14 above.
39. The proposal involves land of just over one hectare in area, a new building with a footprint of some 2075m², which would be variously about 3.7, 7.7 and 9.7 metres high, includes paved areas for the playground, access, circulation and parking. It also involves earthworks to re-form site levels, removal of a relatively small number of trees and loss of an open grassed area. As a consequence there would inevitably be changes to the landscape itself and to a greater or lesser extent to views to, from and within the site.

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40. In terms of assessing the application against the relevant AONB Policies, I do not consider it appropriate to treat it as involving 'Major Development' as described in the context of such policy and guidance. Moreover what is being proposed is not commercial, mineral or transport infrastructure development but is rather other development meeting a social need. It is not therefore necessary to consider, for example, the need for the development in the context of the national interest. It is nevertheless still necessary to give due weight to the natural beauty of the landscape.
41. In my view, the relevant parts of policies against which the application must be assessed are as follows:

Structure Plan EN4

...The primary objective in these areas will be to protect, conserve and enhance landscape character and natural beauty....

Development that is essential to meet local social or economic needs should be permitted provided that it is consistent with the purpose of Areas of Outstanding Natural Beauty...

Tonbridge and Malling Core Strategy Policy CP7:

Development will not be... permitted, which would be detrimental to the natural beauty and quiet enjoyment of the Areas of Outstanding Natural Beauty, including their landscape, wildlife and geological interest, other than in the exceptional circumstances of:

...(b) any other development that is essential to meet local social or economic needs.

Any such development must have regard to local distinctiveness and landscape character, and use sympathetic materials and appropriate design.

Emerging South East Plan Policy C2:

High priority will be given to conservation and enhancement of natural beauty in the region's Areas of Outstanding Natural Beauty (AONBs) and planning decisions should have regard to their setting. Proposals for development should be considered in that context. ...

Proposals which support the economies and social well being of the Areas and their communities... will be encouraged provided that they do not conflict with the aim of conserving and enhancing natural beauty.

It will be noted that the aims and objectives of these policies are all consistent with the purpose of AONB's which in essence is to protect, conserve and enhance their landscape character and natural beauty.

42. In the supporting documentation the applicants have emphasised the extent to which the proposed development has been designed to respect the context of the AONB, informed by professional landscape advice and seeks to minimise impacts on the AONB. In particular a Landscape and Visual Impact Assessment has been submitted. It has had regard to appropriate guidance on Landscape and Visual Impact Assessment, planning policy protection for the Kent Downs AONB, the Kent Landscape Assessment and the Kent Downs AONB Landscape Design Handbook. (The latter document contributes to the implementation and management plan objectives and policies of the Kent Downs AONB Management Plan referred to by Natural England). The Landscape and Visual Impact Assessment prepared by the applicant considers the relationship of the site to the wider landscape, the existence of trees and hedgerows within and around the site, the proposed design of the built development. It also assesses potential landscape impacts and visual effects during and post construction. It then considers the mitigation provided by the design approach and puts forward planting proposals before assessing the residual impacts of the development. The residual impacts are described as follows:

"The development would be substantially screened by existing trees and buildings. Proposed landscape measures would serve to integrate the building into the school

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grounds, but are not required to screen it in views from outside the school. The residual landscape impact would remain Slight Adverse due to loss of green open space within the school. This impact would be felt locally within the grounds of the school, with negligible effect on the character of the wider landscape of the AONB. 15 years after completion of construction, taking into account the landscape mitigation measures, the visual impacts of the development would be slightly reduced. The oak trees planted at the front of the new building would have become established and filled out to filter the view of the front facade. The existing trees along the northern and western boundaries would have increased in height. On the west boundary the field maples will grow taller than the hawthorns, to at least seven metres providing a near total screen of the development in summer. By the summer of year 15, visual impacts in all views would be reduced to Neutral, apart from a residual Slight Adverse impact in the view from the footway along the A227 at the entrance, and a Slight Adverse impact that would remain for the view from upper floor windows at Westlands Farm.”

The submitted Landscape and Visual Assessment summarises the visual impacts as set out in the table below with the second table showing the criteria used to assess the significance of impacts on views:

Receptor	Year of Completion (Winter)	15 Years After Completion (Summer)
Westlands Farm	Slight Adverse	First floor windows – Slight Adverse
Public Footpath MR 244	Slight Adverse	Neutral
Public Footpath MR244A	Slight Adverse	Neutral
Borough Green Rd at entrance	Moderate Adverse	Slight Adverse
3 Terraced houses (Ivy Hall Cottages) on Borough Green Road	Slight Adverse	Neutral

Significance	Criteria
Substantial Adverse	Where the scheme would cause a significant deterioration in the existing view.
Moderate Adverse	Where the scheme would cause a noticeable deterioration in the existing view.
Slight Adverse	Where the scheme would cause a barely perceptible deterioration in the existing view.
Neutral or No Change	No discernible deterioration or improvement in the existing view.
Slight Beneficial	Where the scheme would cause a barely perceptible improvement in the existing view.
Moderate Beneficial	Where the scheme would cause a noticeable improvement in the existing view.
Substantial Beneficial	Where the scheme would cause a significant improvement in the existing view.

43. The County Landscape Adviser has considered the proposal and whilst making some points about particular details of the proposal (see paragraph (21) above) has no objection in principle to it. The applicant has now addressed those points of detail, including some minor amendments to the planting proposals, and the County Landscape Adviser having noted that has no further comments to make with regards to the landscape and visual impact of this proposal. (In addressing those comments 3 further trees adjoining the existing hard standing are to be removed but all of the trees from this area would be replaced with a line of semi-mature oaks.) It will also be noted

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that Natural England has no objections to the planning application with regard to the AONB.

44. Overall, I consider that the findings of the Landscape and Visual Impact Assessment can be accepted and the approach to integration of the development, mitigation and planting appropriate to the site context. The site is contained between existing buildings to the south and the motorway to the north, and is also relatively enclosed from wider views due to intervening trees and hedgerows, including those on three of the site boundaries. Retention of the boundary hedgerows and trees, setting part of the building down making effective use of the sloping ground level and incorporating it with a grassed embankment to the north and the green sloping roof would mitigate the impact of the proposed development. (See proposed cross-sections on page D3.7) In addition the proposed planting would enhance the existing trees and hedgerows, would filter views of the building and further assist in assimilating the development into the landscape.
45. As already noted, the residual impact of the proposed development is assessed as being *slight adverse* 'where the scheme would cause a barely perceptible deterioration in the existing view'. Whilst this may not be a significant impact, it could be questioned as to whether or not this is acceptable given the high level of protection afforded to AONB's and could be asserted that the landscape would be better without any additional buildings or development. On the other hand bearing in mind, that this is a local impact with little impact on the surrounding AONB, the site context, the mitigation through design and the planting proposals, discussed above, it could be argued that the natural beauty is protected in accordance with the relevant AONB policies. I am also mindful that education facilities are required in such areas to meet local social needs, which is recognised by the relevant planning policies. I consider that there is a demonstrable need for the proposed special school and a case made for it to be in this location that I have already accepted in respect of the Green Belt Policy considerations. On balance therefore, subject to the development being carried out as proposed and implementation of the proposed landscaping, I would not raise a landscape policy objection to the proposal.

Playing field provision

46. The proposed development would result in the loss of 9285m² of playing field currently used informally for recreation. Members may have noticed the moveable goals positioned on the site at the time of the site visit. In seeking to protect playing fields, PPG17 referred to above in paragraph (15) states that development proposals on existing playing fields should not proceed unless an assessment has been undertaken that clearly shows the land to be surplus to requirements. There is also a statutory requirement to consult Sport England on development proposals, which would lead to the loss of such playing field land.
47. The applicant has argued that application site is surplus playing field land, there being sufficient land to meet the sport and recreation needs of both schools on the site (without 'double counting' any provision) with a further surplus of 1925 m² besides. (This is based on the minimum requirements in Building Bulletin 98: Briefing Framework for Secondary School projects.) A plan showing how the playing fields are/can be laid out for summer and winter sports is included on page D3.3. Whilst Grange Park's hard play requirements would be met directly on the application site, playing field requirements would be provided as a shared facility. Given the co-location model proposed the applicant advises that time tabling would proceed in a fully co-ordinated manner to ensure maximum use and efficiency of use is secured.

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48. Sport England initially raised an objection to the application for the reasons set out in paragraph (21) above. The applicant has since provided an assessment of the proposal in the light of that objection and addressing these issues with regard to relevant policy and other material considerations. The assessment identifies that there is an existing surplus of playing pitch provision in the surrounding catchment area, that significantly enhanced open space provision for Grange Park School would be secured (bearing in mind its current circumstances) and new indoor sports provision would be secured. It also reaffirms that neither school would be left with a deficiency in playing pitch terms. In addition, the assessment identifies possible future playing pitch provision immediately to the south of Wrotham School at Whitegate Field, potentially in the form of floodlit all-weather provision. It is also argued that the proposals should be considered as an “exceptional case” in the context of the relevant Sport England policy. In this respect it is noted that the proposal would result in a school currently inadequately served, securing vastly improved quantitative and qualitative provision, without jeopardising the requirements of Wrotham School or local demand. In light of the above, it is concluded that the special circumstances surrounding the application proposals and context provided by existing surplus and future proposals, amount to a development that accords with the established Sport England policy statement. At the time of writing Sport England is reviewing the applicant’s assessment and is considering whether or not it would be in a position to withdraw its objection. Should Sport England continue to object, if Members were minded to grant planning permission it would be necessary to consult The Secretary of State for Communities and Local Government under The Town and Country Planning (Playing Fields) (England) Direction 1998. I will report verbally at the Committee meeting on the up to date position.
49. The point made by Wrotham Parish Council relating to the possible future playing pitch provision immediately to the south of Wrotham School on Tonbridge and Malling Borough Council land will be noted. I understand that the Borough Council, with Wrotham School Headmaster also being involved, is pursuing this as a separate proposal with funding being sought from the Kent Football Foundation. However, subject to Sport England’s further views, I do not consider that securing its provision on the basis of the new school proposal would be justified. Besides its provision would be beyond the applicant’s control.

Design

50. Development Plan Policies require development to be well designed and to respect its setting. In a broader sense, the siting and design of the development have been considered above in the context of the landscape considerations. I consider that the proposed green roofs, the massing of the building, the curved form of the development making good use of the sloping site levels, retention of significant boundary hedgerows and trees together with new planting, are all positive aspects of the proposed siting and design.
51. In terms of the elevational appearance of the building on the north side with sloping green roof, grassed embankment/reduced site levels and with no openings for windows or doors it is intended that the building would in effect merge into the landscape. On the other side, the south facing elevation would be stepped from the front low level flat roofed accommodation (which also has a number of roof lights) back to the vertical face of the accommodation to the rear that would be needed to provide lighting and ventilation. Hence these parts of the building would mainly be dominated by the proposed Kalwall walling system (*a translucent material that allows diffused daylight through but opaque in appearance*) and high-level louvre panels, referred to in

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paragraph (7) above. In addition there are a number of circular windows to the front. (See proposed floor plan on page D3.6 and elevations on page D3.8). The walls would otherwise be a subdued, green coloured, render material. The green roof of the hall together with proposed solar panels would also be visible. I consider that the proposed elevational treatment and use of materials is appropriate and these could be controlled by condition, with the final selection of any colour treatment and finishes being reserved for approval.

52. Paving for playgrounds, access, circulation and car parking areas generally follow the curved shape of the building. The playground would be fenced off with a hoop-topped fence, as would the area of green space to the north west of the site. As mentioned elsewhere a landscaping scheme, including new planting, is proposed to help integrate the whole development into its surroundings. Longer term, elements of the new planting would filter views of the more dominant appearance of the southern elevation. If permission is granted the implementation of the submitted landscaping scheme, as amended, could be covered by condition and final details of fencing and paving materials reserved by condition.
53. In terms of sustainability, the applicant states that in the design of the school they are aiming to achieve at least BREEAM for Schools (2006) Very Good Rating.
54. Subject to the conditions covering the matters referred to above, overall I consider that a high quality design for the development, in accordance with Development Plan Policies, would be achieved.

Transport and access issues

55. As indicated in paragraph (8) above the school has been designed for 55 pupils. In terms of staff the applicant has confirmed that there are currently 33 members of staff at the existing Grange Park School and that a similar number would be needed at the proposed new location. Given that these would be additional pupils and staff to those at Wrotham School, the proposed development would involve an increase in the traffic generated from the site. The access, parking and drop off and pick up arrangements are referred to in paragraph (8) above and shown on the drawing on page D3.6. The Divisional Transportation Manager detailed views are set out in paragraph (21) above. It will be noted that he is satisfied with the access arrangements and the on site parking provision and has raised no objection to the proposal subject to certain conditions. Furthermore he does not consider any offsite highway improvements including those suggested by Wrotham Parish Council would be justified in this particular case.
56. If planning permission is granted, in addition to the conditions required by the Divisional Transportation Manager, it would be appropriate to also impose a condition requiring the relocated school to prepare a Travel Plan in consultation with Wrotham School to reflect and review the changed position at the site. Even though the transport for the 55 SEN pupils is not likely to change as a result, there may be possibilities for staff to car share or use public transport.
57. It is proposed to resurface the area of the existing hard standing at the southern end of the application site, which will also provide access to the new parking areas. This is currently used by parents for setting down and picking up their children from Wrotham School at the beginning and end of the School day. In addition, Wrotham School uses the area adjoining the grassed area for a certain amount of informal parking. I understand that the use of the area by Wrotham School would continue for the time

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being but as part of the new development proposals the use would be formalised by marking out parking spaces and defining circulation routes. Details were not submitted with the application but these could be reserved by condition if planning permission is granted.

Traffic generated noise from the adjoining highways

58. Given the proximity of the M26 motorway and A227 Borough Green Road traffic noise impact is an issue for the applicant both in designing the building and external environments. It is also material to the consideration of the planning application. Planning Policy Guidance Note 24: Planning and Noise (PPG24), referred to in paragraph (16) above, states that noise-sensitive development should not be permitted where exposed to unacceptably high levels of noise. Similarly, Structure Plan Policy NR6 and Tonbridge and Malling Local Plan Policy P3/17 would not support proposals where mitigation measures would not afford satisfactory protection. In designing the development, the applicant has been guided by the standards set out in Building Bulletin 93 (BB93) 'Acoustic Design of Schools, A Design Guide. Department for Education and Skills, 2003' and I understand, would be required to achieve them for the internal environment to obtain Building Regulations approval. The design and siting of the development has therefore, amongst other considerations, been strongly influenced by the need to achieve the necessary standards for acoustics.
59. The applicant has submitted an acoustic assessment, which concludes that, the proposed location and design for the school development is suitable for the school development in terms of the acoustic environment. Our Noise Adviser's initial views are set out in paragraph (21) above and amongst other points made considered that noise levels are likely to be 1dB higher than the applicant predicts and that account should be taken of future increases in noise levels. The applicant has given consideration to the comments made and provided additional information to take account of future increases in noise levels as advised by BB93. Our Noise Adviser considers that the projected increase of 0.7dB is not unreasonable and comments that this would result in levels of less than 2dB higher and that this difference would not be considered perceptible.
60. The detailed design and specification of the new building would be critical to achieving the desired ambient acoustic levels for the internal environment, which is considered to be achievable. If permission is granted I agree with Tonbridge and Malling Borough Council that an appropriate condition should be imposed requiring noise levels in teaching rooms not to exceed 35dB $L_{Aeq,T}$, in accordance with BB 93. Wrotham Parish Council has similarly requested that it be conditioned, in view of "creating an extremely sensitive noise receptor in an inherently noisy location." I would also draw attention to its further point that "any subsequent application that has the potential to increase noise and disturbance above this level would be unacceptable to the welfare of the children with Autistic Spectrum Disorder and be rejected." Clearly, any future application would have to be treated on its merits and cannot therefore be pre-determined.
62. In respect of the external environment, the applicant is not proposing any additional acoustic screening of the external play ground levels but is rather relying on the position of the building to reduce noise from the motorway to acceptable levels. Whilst in some areas of the external areas predicted noise levels are close to the upper limit recommended in BB93 our Noise Adviser considers that playground areas could be described as having reasonable acoustic conditions.

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63. As set out in paragraph (21) above Borough Green Parish Council states that consideration should be given to changing the position/location of the building within the site to mitigate the effect of the buildings shape 'collecting' the noise generated by traffic passing on the A227. In response to the Parish Council's comments the applicant's noise consultant has commented as follows:

"The dominant source of noise in the vicinity of the proposed school site is traffic noise associated with the M26. Therefore the proposed orientation of the school is such that optimum mitigation from the M26 has been achieved. Even with the school in its current orientation the dominant source of noise at the front of the school (within the crescent) is still the M26 with noise from the A227 contributing to a lesser extent. Altering the orientation of the building to 'shield' the school from the A227 would therefore increase the exposure of the school to noise emanating from the M26.

With regards to the condition of the pupils at the school there is no specific guidance which refers to preferred acoustic conditions for Autistic children. However advice from the National Autistics Society suggests that children with Autism are often more susceptible to noise change than most. Therefore every effort has been made to provide a consistent noise level around the front of the school building and on the hard play area where children are likely to spend most of their school day. With the school in its current orientation a consistent noise level of 55 dB – 56 dB is predicted at these areas. *(NB these figures take account of future predicted increases in noise levels of 0.7dB but not the 1dB higher level suggested by our Noise Adviser.)* This is within the criteria specified within Building Bulletin 93 (Acoustic Design of Schools, A Design Guide. Department for Education and Skills, 2003.) Whilst it is appreciated that the symptoms of Autism can vary dramatically from case to case and that a consistent noise level may not benefit all Autistic pupils at the school, it is considered that a consistent background noise level across the play area is likely to benefit a number of pupils. Acoustic modelling has demonstrated that changing the orientation of the school in its current location is likely not only to increase the overall noise level at the front of the school but also to disrupt the even distribution of noise."

64. I am mindful of the particular noise environment at this location and the concerns that have been raised about its impact on the users of the proposed development. Due regard must also be given to the siting, layout and design of the development, which seeks to mitigate noise levels and has generally been demonstrated to provide an acceptable acoustic environment. Therefore bearing in mind the conclusions of our Noise Adviser, I do not consider that there are grounds for raising an objection to the proposal on the basis that the users of the development would be exposed to unacceptably high levels of noise.

Air quality

65. An air quality assessment was carried out to consider impact from construction and to assess the potential effects of traffic emissions from the A227 and the M26 with regards existing local air quality. Advice from our Air Quality Consultant on the assessment is set out in paragraph (21) above. It does not raise any issues of concern or that are material to the determination of the application.

Drainage and protection of water resources

66. Although some details relating to surface water drainage for the new development have been provided, the Environment Agency wishes to see a full drainage strategy to

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demonstrate that the development would not increase flood risk elsewhere. It has not raised an objection to the application and this along with detailed drainage details could be reserved by condition, and the Environment Agency consulted to ensure that it meets its requirements. Similarly the requested condition relating to control over any potential contaminants could be included and its advice relating to drainage, groundwater protection, and on waste management and pollution prevention during construction covered by an informative.

Ecology

67. An ecology report and Great Crested Newt Survey has been submitted with the application and makes certain recommendations including appropriate mitigation measures in respect of nesting birds and Great Crested Newts, and suggestions for ecological enhancements. If permission is granted these matters could be covered by appropriate conditions including those requested by Natural England and the Environment Agency in these respects.

Archaeology

68. A Heritage Assessment has been carried out which concludes that the potential for archaeological features is low and that the evidence suggests that the site was an agricultural landscape. The County Archaeologist's views are awaited.

Residential amenity

69. The location of the nearest residential properties is shown on the plan on page D3.2. Given their location I do not consider there would be any direct impacts arising from the development. There would be changes to local views of the site and an increase in activity mainly arising from the additional traffic, as discussed elsewhere, but I do not consider that there would be a loss of residential amenity as a result of the development. Issues relating to construction activity are dealt with below.

Construction

70. Given that there are nearby residential properties, if planning permission is granted it would, in my view, be appropriate in order to protect their amenities to impose a condition restricting hours of construction and demolition. I would suggest that this should be 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. It is also normal on school sites for contractors to be required under the terms of their contract to manage construction traffic/deliveries to minimise conflict with traffic and pedestrians at the beginning and end of the school day. This and other issues raised by the Divisional Transportation Manager relating to construction will be noted and could be covered by conditions and/or informatives.

External lighting

71. No details have been provided on external lighting for the development at this stage. It is likely that it would be required for the convenience and safety of site users, and site security. In view of the potential impact of such lighting on the wider landscape setting, if permission is granted, it would be appropriate to reserve details by condition so that the type and position of the external lighting can be controlled to ensure light pollution can be minimised and to accord with Structure Plan Policy NR5.

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The proximity of the proposed Borough Green and Platt Bypass.

72. As noted in paragraph (2) above, the junction onto the A227 of the proposed Borough Green and Platt Bypass which is safeguarded in the Local Plan in accordance with the County Council's currently adopted scheme, encroaches onto the application site. The bypass scheme is currently being reviewed in preparation for the submission of a planning application, as the previously granted planning permission is no longer extant. As far as it is currently possible to do so, the design of the school proposal has taken account of the safeguarded route of the bypass. However, it is clear that implementation of the bypass as currently adopted would, at the time of its construction, require some alterations to the existing access arrangements to the school site and a small number of the proposed parking spaces (perhaps 6) may be lost or need to be relocated, depending on the final details of the bypass scheme. As a result there would be issues of potential impacts on the landscape in terms of loss of existing boundary hedgerows/trees, and proposed new planting on the school site, which the above assessment cannot account for. In addition the bypass scheme could give rise to increase in noise levels from traffic experienced at the site which similarly cannot be accounted for in the assessment above. Clearly any assessment of a Borough Green Bypass scheme that comes forward as a new planning application would need to consider its impacts on the Grange Park School application site and any consent for the bypass could be conditioned to ensure that any impacts were appropriately mitigated. However, it is appropriate that Members have the potential bypass scheme in mind at this stage, although I do not consider that this proposal would prejudice the implementation of the bypass. Therefore, in my view, refusal would not be warranted on the basis of any potential impacts on the site or proposed development now being considered that the bypass may or may not give rise to.

Conclusion

73. This proposal seeks to provide much needed additional/improved accommodation and facilities to replace the existing inadequate accommodation and facilities for Grange Park School currently located at Leybourne. Facilities for the provision of community services, including those for education, are generally supported by Structure Planning Policy QL11. The application site is also located on a long established school site. However the site is within the Metropolitan Green Belt and the Kent Downs Area of Outstanding Natural Beauty where there is a general presumption against such development. The issues arising from these designations and other issues are discussed in some detail above. I consider that very special circumstances have been demonstrated for overriding Green Belt policy constraints; in terms of the demonstrable need put forward, the lack of alternative solutions, the benefits of co-location with Wrotham School and mitigation of the impact on openness afforded by the proposed siting and design. Similarly, I would not raise a landscape policy objection, bearing in mind the limited impact on the wider context of the Area of Outstanding Natural Beauty and that the development would be substantially mitigated. Furthermore I consider that the demonstrable need for the development and case made for it to be at this location outweighs the relatively minor residual landscape impact arising from the development. Therefore, on balance, and subject to the further views of Sport England and to the imposition of conditions, I am of the opinion that the proposed development would otherwise be in accordance with the general aims and objectives of the relevant Development Plan Policies. Subject to the views of Sport England, I recommend that the application be referred to the Secretary of State for Communities and Local Government, and that subject to her decision, planning permission be granted subject to conditions.

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Recommendation

74. SUBJECT TO the views of Sport England, I RECOMMEND that the application BE REFERRED to the Secretary of State for Communities and Local Government, and SUBJECT TO her decision, PLANNING PERMISSION BE GRANTED SUBJECT to conditions, including conditions covering:
- the standard time limit,
 - the development to be carried out in accordance with the permitted details,
 - external materials in accordance with the submitted scheme,
 - implementation of appropriate tree protection measures,
 - implementation and subsequent maintenance of landscaping and planting proposals,
 - details of fencing and paving materials,
 - noise levels in teaching rooms not to exceed 35dB $L_{Aeq,T}$, in accordance with BB 93,
 - external lighting specifications to be agreed,
 - any necessary condition(s) relating to archaeology,
 - submission for approval of details drainage, including a drainage strategy to ensure that the development does not increase flood risk elsewhere,
 - potential land contamination,
 - mitigation measures relating to nesting birds and the protection of the Great Crested Newts, including protection of the pond on the site, and proposals for ecological enhancements,
 - provision of access, circulation and parking facilities before the building is first occupied or brought into use, and the surfacing and marking out of the area of hard standing used by Wrotham School,
 - maintenance of visibility splays,
 - on site facilities for the parking and turning of all contractors and suppliers vehicles, with no deliveries to be made from the public highway,
 - the use of the vehicle access from the public highway for construction access and deliveries not to be used during the school AM drop off and PM collection times unless work is programmed outside of the school term,
 - the public highway to be kept clean of mud and debris occasioned by the works, including provision of on site wheel washing facilities,
 - the protection of all pedestrian movements within the site during construction to be maintained at all times,
 - submission for approval of a School Travel Plan, and
 - any necessary condition(s) required by Sport England.
75. I FURTHER RECOMMEND THAT the applicant BE ADVISED of the following informative:
- Account should be taken of Environment Agency's advice relating to drainage, groundwater protection, waste management and pollution prevention during construction.
 - Account should be taken of Natural England's advice relating to protected species.

Case officer - Paul Hopkins	01622 221051
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Background documents - See section heading
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