

Sevenoaks Grammar Annexe and Trinity Free School at
Knole (east) Academy (former Wildernesse School),
Sevenoaks – SE/14/13 (KCC/SE/0375/2013)

A report by Head of Planning Applications Group to Planning Applications Committee on 11 June 2014.

Application by Kent County Council Property & Infrastructure Support for the redevelopment of the former Wildernesse School site: Proposed demolition of existing school buildings, retention and refurbishment of existing Sports Centre, erection of two new secondary schools (a 6 form of entry Sevenoaks Grammar Annexe and a 4 form of entry Trinity School), introduction of new vehicular and pedestrian accesses, rearranged and extended car park to provide 242 car parking spaces and dedicated child drop off/collection and bus zones, relocation of existing tennis courts into two new Multi Use Games Areas and associated detailed landscape works at Knole (east) Academy, Seal Hollow Road, Sevenoaks - SE/14/13 (KCC/SE/0375/2013)

Recommendation: that the application be referred to the Secretary of State as a departure from the Development Plan on Green Belt grounds, and that subject to his decision, planning permission be granted subject to conditions.

Local Members: Mr N Chard

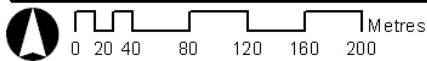
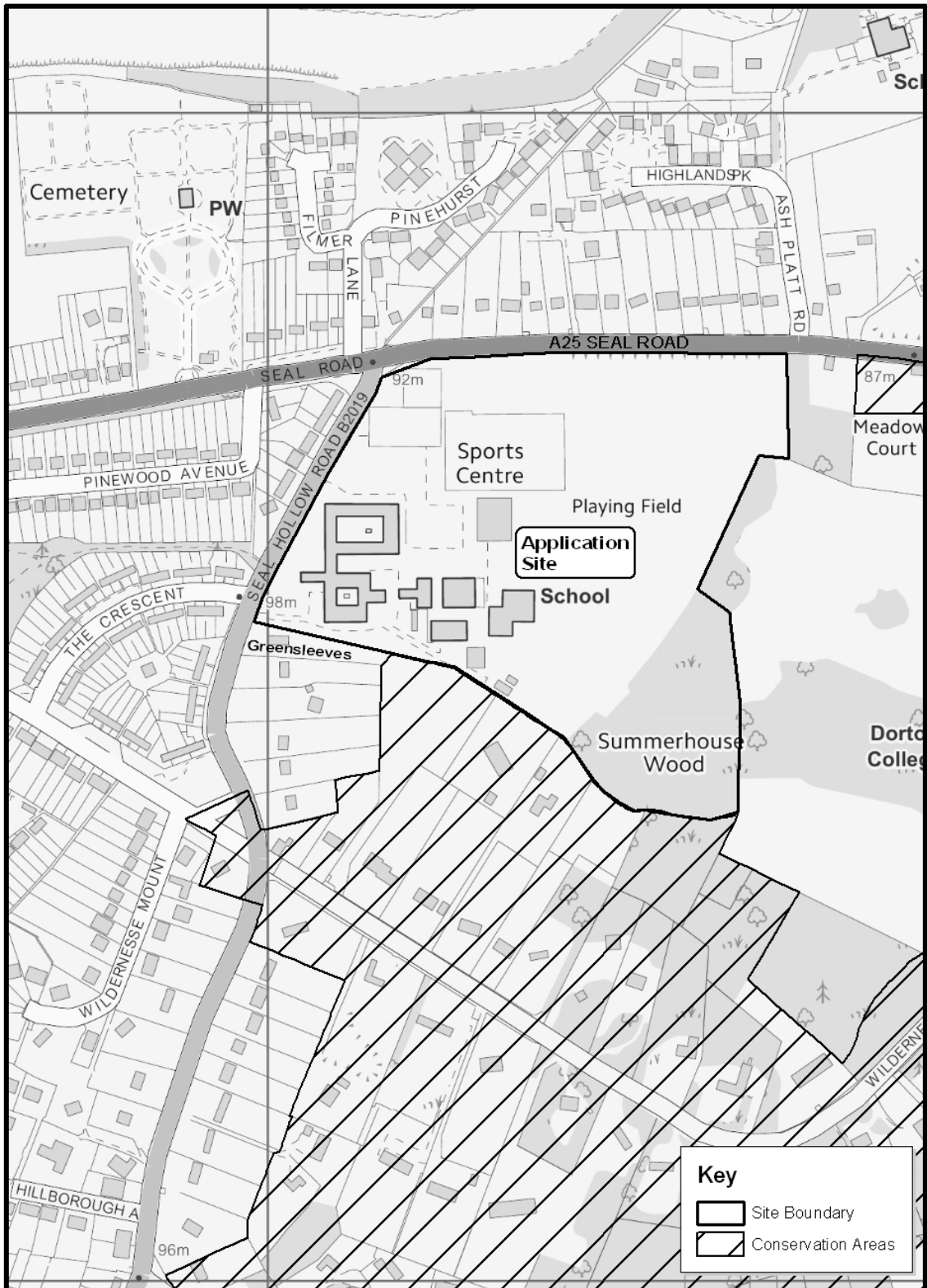
Classification: Unrestricted

Site

1. The Knole (east) Academy site is situated on the east side of Sevenoaks just over a mile from the town centre, on the site of the former Wildernesse School. Following the recent relocation of Knole Academy to the west site (see paragraph 4) the Knole east site is vacant. The site lies on the southern side of the A25 Seal Road, which is a main arterial route into and out of Sevenoaks from the east, and on the eastern side of Seal Hollow Road (B2019). The application site is 11.84 hectares in area, and is currently occupied by a number of single and two storey buildings associated with the site's previous educational uses (total footprint of 8,778m²). The built development on the site is predominately concentrated in the south western corner of the site, with hardstanding and car parking extending along the western boundary, linking with the existing pedestrian and three vehicular accesses to the site from Seal Hollow Road. An existing floodlit Multi Use Games Area lies to the north of the school buildings, running parallel with the A25 Seal Road. The eastern half of the site accommodates the former school playing fields, and an area of woodland. The topography of the site is stepped, sloping down from west to east away from Seal Hollow Road.
2. The whole of the former academy site is located within the Metropolitan Green Belt, and outside of the settlement confines of Sevenoaks. Trees and hedgerows line the boundaries of the site, which in the most part are dense and mature. The northern site boundary abuts the A25 Seal Road, with facing residential properties located to the northern side of that road. Seal Hollow Road lies to the west of the site, again with facing residential properties located to the far side of the road. To the east of the site lies Dorton College, although this is separated from the application site by a densely planted area of woodland known as Summerhouse Wood. The southern boundary of the application site abuts the Wildernesse Conservation Area, which encompasses residential properties predominately on Wildernesse Avenue, Woodland Rise, Parkfield and Blackhall Lane. The Conservation Area is characterised by large residential dwellings in large open plots with substantial natural landscaping. Properties in Wildernesse Avenue back onto the southern boundary of the application site, and planning permission has recently been granted by Sevenoaks District Council

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Site Location Plan



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Ordnance Survey 100019238

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for a further two properties to the rear of those in Wildernesse Avenue (application reference SE/13/02393/FUL). To the south western corner of the application site lies 'Greensleeves', the closest property to the site boundary, located on the eastern side of Seal Hollow Road to the immediate south of the application sites southern boundary. This property is not within the Conservation Area. To the immediate east of the site is a designated Area of Local Landscape Importance.

3. In light of the site's Green Belt designation, this application has been advertised as a Departure from the Development Plan. The site is not within any other landscape or planning designations.
A site location plan is attached.

Background/Relevant Planning History

4. The existing school buildings on the site date back to the 1970's, when the school first opened as a single sex school for boys. The site has an established 6 form of entry (FE) school use with Sixth Form (1260 pupils), but has also previously been used as an 8 FE school without Sixth Form (1200 pupils). In 2010, the Wildernesse School for boys and Bradbourne School for Girls amalgamated to form Knole Academy as part of the Government's Academies Programme. The Academy, until recently, operated from the sites and existing buildings of the two predecessor schools but the two schools recently amalgamated onto one site, at the former Bradbourne School for Girls, leaving the Wildernesse site vacant and redundant in terms of educational provision.
5. Planning permission was granted in November 2012 for the redevelopment of the former Bradbourne School site, including the retention of existing school buildings, the erection of a new three story academy building, and associated facilities. That application, reference number SE/12/1163, was considered by Members of the Planning Applications Committee on the 9 October 2012, and subsequently referred to the Secretary of State as a departure from the Development Plan on Green Belt grounds.
6. At the time of writing this report, I am advised by the applicant that the Secretary of State for Education has ruled that a selective school expanding onto a satellite site would be considered lawful. I am also advised that a change from single sex (the host school) to co-educational provision at the satellite annexe would not be lawful. I understand that the applicant has taken legal advice from both the Department of Education and the County Council's legal department and has recently invited further proposals from an interested school which the applicant hopes will be considered more favourably by the Department of Education.
7. Trinity Free School is a state funded Christian secondary school which opened in September 2013, established under the Government's Free School Initiative. The Free School is currently located in a former office building (Ryedale Court) on London Road, within Sevenoaks Town Centre.

Additional Information

8. Additional information was submitted by the applicant on the 25 April & 2 May 2014, which included a supplementary Transport Assessment, further information with regard to ecological and arboricultural matters, further details regarding the educational case of need, and minor changes to the proposed landscaping on site. This additional information was sent to consultation at the beginning of May, and will be included within the proposal section below.

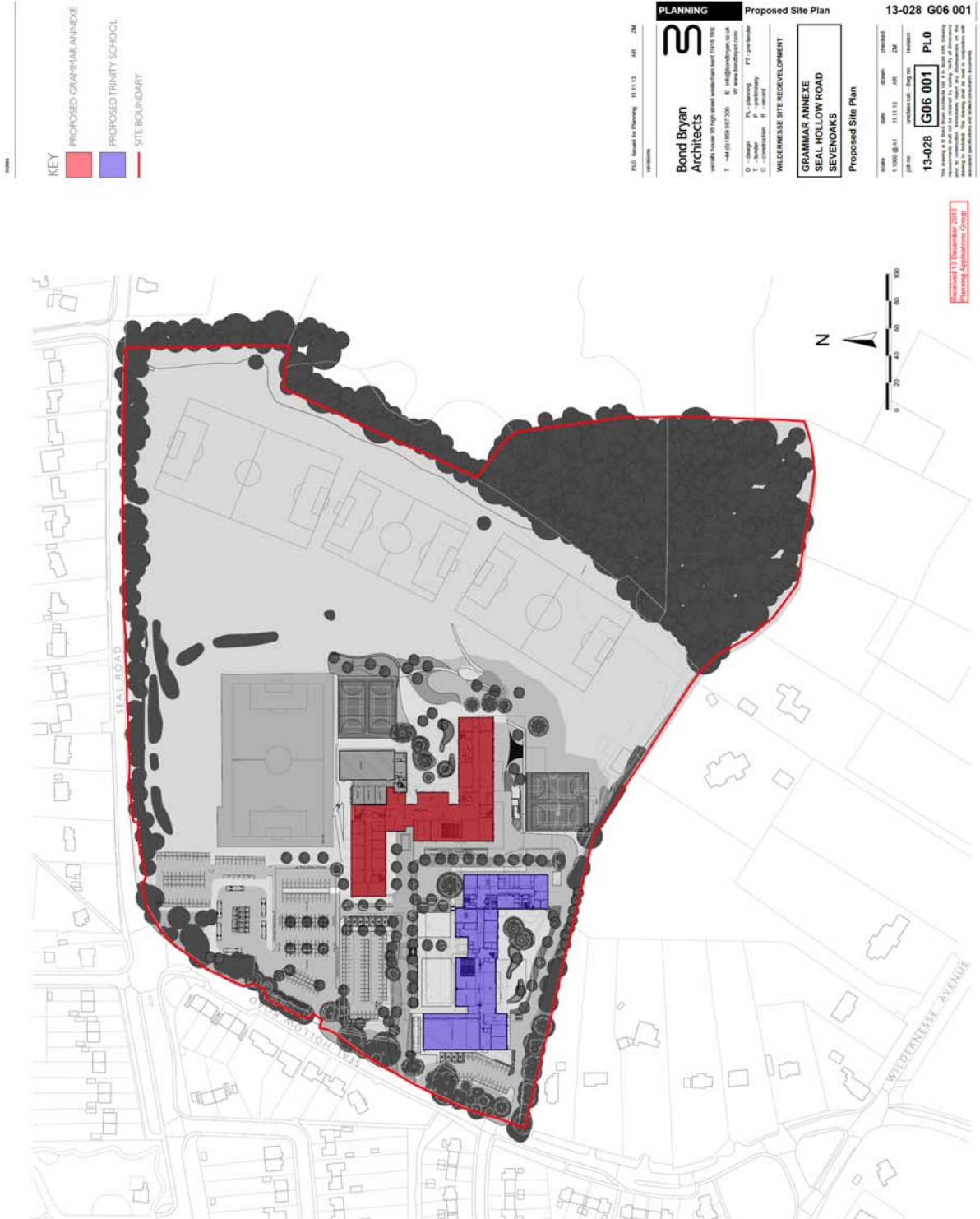
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Existing Site Plan



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Proposed Site Plan



Sevenoaks Grammar Annexe and Trinity Free School at Knole (east)
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Aerial View Looking East



Bond Bryan
Architects

drawing name: Aerial View 2

client: All

scale: 1:75

WILDERNESSE SITE REDEVELOPMENT

Received 13 December 2013
Planning Applications Centre

Item D3

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Aerial View Looking North



Bond Bryan
Architects

Project No. PL0

Planning Ref: Aerial View 1
Date: 13-02-2013

Scale: 1:500
Date: 14-11-13

WILDERNESSE SITE REDEVELOPMENT
GRAMMAR ANNEXE

Received 13 December 2013
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Aerial View Looking South West



Bond Bryan
Architects

Drawing name: Aerial View 3
Drawing No: 13-028
Drawing Date: 000 003
Revision: PLO

Drawn: AB
Checked: ZB
Date: 14.11.13

WILDERNESSE SITE REDEVELOPMENT
GRAMMAR ANNEXE

Received 13 December 2013
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Sevenoaks Grammar Annexe and Trinity Free School at Knole (east) Academy (former Wildernesse School)– SE/14/13 (KCC/SE/0375/2013)

Proposal

9. This application has been submitted by Kent County Council Property and Infrastructure Support and proposes the redevelopment of the Knole (east) Academy site (former Wildernesse School) to provide two new secondary schools, a 6 form of entry (FE) Grammar Annexe and a 4FE Free School. The Grammar Annexe would accommodate 1260 pupils (including 360 Sixth Form pupils) and 120 FTE staff, and the Trinity Free School 790 pupils (including 190 Sixth Form Pupils) and 100 FTE staff (2,270 staff and pupils in total). The masterplan for the site includes two separate school buildings, with shared parking, drop-off, play and sports facilities.

Accommodation

10. This application proposes the demolition of the existing single and two storey school buildings on site (apart from the Wildernesse Sports Centre), and the erection of two new 2, 3, and (in part) 4 storey secondary schools. It is proposed to contain the proposed development to the existing hardstanding areas, and within the broad footprint of the buildings to be demolished. The Grammar School Annexe is proposed in the larger of the two buildings, located towards the centre of the site frontage on Seal Hollow Road. The three storey building would provide 8,671 sq.m of new internal floorspace, with an additional 1297 sq.m of internal floorspace in the existing Sports Centre, which would be retained and refurbished. The Trinity Free School building would be located to the south west of the application site, and would provide 6,500 sq.m of internal floorspace over a part 2, part 3 and part 4 storey building.
11. It should be noted that the existing school buildings on the application site have a gross external floor area of 10,312 sq.m (including the sports centre), and a footprint of 8,778 sq.m. The proposed buildings would provide a total gross external floor area of 17,386 sq.m (including the sports centre), and a footprint of 8,128 sq.m, 1048 sq.m of which is the existing sports centre.
12. The general teaching facilities in both schools would be organised within the 19.5 metre wide 'wings' of the buildings, with all teaching and learning spaces designed to offer flexibility to respond to changing demands and forms or curriculum delivery. The majority of the rooms would be designed to accommodate most subject areas, with appropriate technology, network access, interactive whiteboards and projectors. The proposed building would also provide a range of specialist facilities to meet the needs of the curriculum, including accommodation for science laboratories, technology workshops, food rooms, music and performing arts spaces and sports facilities.
13. Within the Grammar Annexe, a central atrium is proposed, which would act as a hub for the entire school providing a large well-lit environment for dining, breakout and learning. The atrium would also provide the main social and circulation space within the school. The Sixth Form area, drama studio, main hall, dining spaces and library would all be accessed via the central atrium and would be publicly accessible and available for community use. The Grammar Annexe would have 55 teaching spaces spread throughout the three storey building, including 27 standard classrooms, 9 science labs, 2 art rooms, 2 music classrooms, a drama studio, CAD room, food room, graphics rooms and textiles room.
14. Within the Trinity Free School, a double height dining area would be the social central heart of the school. The space would also be able to physically link with the main hall and activity studio to provide a large flexible space for worship. The proposed sports hall, activity studio, main hall and dining areas within Trinity School would be publicly

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accessible and available for use out of school hours. The Free School would have 37 teaching spaces spread throughout the part 2, 3 and 4 storey building, including 14 standard classrooms, 4 science labs, 2 ICT rooms, 2 art rooms, 2 technology/CAD rooms, and activity studio, a music room and a food room.

15. For both schools, the visitor and student reception areas would be close to the main entrances, with adjacent administration and office space. The main entrances would be central to the site, clearly visible and accessible from the main pedestrian access point and car parking areas.

Design and Appearance

16. Both schools have been oriented to minimise direct east and west facing classrooms that are most challenging in terms of solar and glare control. Easterly low angle sun in the morning heats up classrooms before students arrive. Classrooms then get even warmer when pupils arrive and teaching activities commence. The wings of classrooms, where possible have been designed to ensure all classrooms face predominantly north and south, with appropriate external shading to address both the solar gain and direct sunlight to the south. The north elevation has been designed so that 40% of the facade would be glazing, whereas the south facade would have only 30% glazing. A light shelf would bounce reflected light from the south facing windows deep into each classroom, providing equal daylight to the south facing classrooms as the north facing classrooms, which have 10% more glazing. The light shelf to the south facing rooms would also act as a brise soleil and provide shade below. As a result, the proposed building has been designed to be well protected from solar gain and glare whilst still achieving a high quality of daylight. In addition, the majority of the double height spaces have been sited so that they face west. Sports halls, drama studios and halls require less fenestration than classrooms, and as heat rises the affect of heat gain is felt less in double height spaces. Openable high level windows can draw the heat out of double height spaces through 'stack effect'.
17. With regard to the Grammar Annexe, this is proposed as a three storey building which has been configured to link to the existing two storey sports centre. The building is proposed to be located towards the centre of the site, on the middle plateau, separated from Seal Hollow Road by existing and proposed car parking and, in part, by the proposed Trinity School building.
18. With regard to the Trinity Free School, a 'Z' shaped building is proposed, running east to west on the upper plateau of the site, located to the south west corner of the application site. The western half of the building, nearest to Seal Hollow Road, would be two storey, with the eastern half of the building being a mix of three and a small element of four storey. The eastern wing of the proposed building would be located on the middle plateau of the site, enabling a lower ground floor to be provided below the ground floor level of the other two wings of the main school. The eastern end of the central wing of the building would be three storeys in height, but the north east corner of the building would be four storey due to the provision of the lower ground floor level. The remainder of the eastern wing would be three storey due to a reduction in roof height.
19. Due to the central location of the Grammar Annexe building it is not located adjacent to a site boundary and/or residential properties. The Trinity School building is located to the south west of the site, parallel to the sites southern boundary. The distance between the existing school buildings southern most elevation and the nearest residential elevation to the south on Seal Hollow Road (Greensleeves) is approximately 39 metres. Likewise, the distance between the western most elevation of the existing school

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buildings and the nearest residential elevation to the west (opposite site of Seal Hollow Road) is approximately 33 metres. The applicant advises that the proposed buildings would be 29.3 metres from the nearest residential elevation to the south, and 52 metres from the nearest residential elevation to the west.

20. The design of the exterior facades of the Grammar Annexe and the Free School aims to be 'cutting edge yet timeless through the juxtaposition of traditional and contemporary materials'. The architectural language and the palette of materials chosen for the both Schools are similar such that they complement each other, yet are subtly distinct to distinguish the two schools. The applicant has provided the following as an indication of the materials proposed:

- Brickwork (terracotta to the Grammar Annexe; grey/blue to Trinity School). This would also serve as a vandal resistant robust base.
- White insulated render to break up the brick facades and to present a crisp contemporary aesthetic.
- The brickwork at ground level would be interspersed with extensive glazing to dining, library and other social areas in both schools to offer active frontages and views out.
- The brickwork would be interspersed with coloured insulated render panels.
- The windows at the ground and upper levels would be simple, equally spaced, powder coated aluminium framed punched windows. Louvered panels would provide natural ventilation to the learning spaces.
- The school entrances would be treated with large panes of curtain walling to offer a view through into the schools, emphasizing their transparency and accessibility. Large pane windows proposed where possible to provide unrestricted views from the entrance foyer to the landscape behind.
- Horizontal powder coated aluminium light shelves have been provided to the southern facades, providing solar shading and glare control.
- Aluminium powder coated roof-lights with associated powder coated louvres are proposed to provide top day lighting and natural ventilation to the atrium spaces and the circulation areas within the classroom wings

(powder coated finishes would be dark grey (RAL 7016))

Sports Facilities and Community Use

21. The existing floodlit Multi Use Games Area (MUGA), which is currently used by the community, would be retained as part of this proposal. In addition, the existing Wildernesse Sports Centre would be retained and refurbished throughout, including the services installations and external fabric upgrade. The Sports Centre would serve as the sports facility for the Grammar Annexe and would be linked to the Grammar building, reading as part of the main building in terms of elevational treatment and external appearance (following refurbishment). A direct external access would be retained for community access out-of-school hours. The proposed 4-court Sports Hall attached to Trinity School would further enhance community sports provision on the site. In addition, existing tennis courts on site, which are in a poor state of repair, would be relocated to accommodate the proposed bus turning and parking facility. Two new tennis court sized MUGAs are proposed, one for each school. These replacement facilities would be located to the east of both schools, and would accommodate 1 netball/basketball court, or 2 tennis courts each. Existing grass playing pitches would be retained in their entirety, providing a rugby and football pitch, and 400 metre running track. The Schools are also intending to provide controlled community access to facilities like the library, performance and dining spaces out-of-school hours. The applicant further advises that all of the soft landscaping and grass sports pitches would be retained, with the new buildings located over the footprint of existing buildings and hardstanding.

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Hours of Operation

22. The school hours for both the Grammar Annexe and the Trinity School are yet to be confirmed although they are expected to be generally 07.30 to 17.00 Monday to Friday, which would include a staggered start and finish time of both schools (30 minutes apart). The existing Wildernesse Sports Centre is available for use until 22.45 Monday to Friday, 22.15 on Saturdays and 22.15 on Sundays. This is expected to remain unchanged.

Access/Parking

23. The existing school site has three vehicular access points from Seal Hollow Road, and one pedestrian access. All three of the existing access points would be retained (the dedicated 'entrance' and 'exit' points at the middle of the site frontage, and the access on the southern boundary used by a pre-school nursery and deliveries only). The existing 'entrance' would be widened to 6.5 metres to provide easier access for buses into the site. A fourth vehicular access point is proposed mid way between the existing exit and the existing southern most access. To the north of the new vehicular access point would be a new pedestrian access, which connects to a wide pedestrian boulevard which would serve both schools.
24. The existing site's main car park is marked with 87 car parking spaces, including two disabled spaces and has marked circulation routes through the car park including a hatched bus drop-off/collection zone with 'sleeping policeman' speed humps to slow traffic speeds entering and leaving the hatched drop-off zone. Around the site there are numerous informal car parking areas that have been used by staff previously when the Wildernesse School was open. This application proposes to provide a total of 242 car parking spaces, split into a larger car park to the north accessed via the existing 'entrance' (widened) and 'exit, and a smaller car park to the south, accessed via the new vehicular access point (in and out). The existing southern access would be retained for service access and deliveries only. The pedestrian boulevard would separate these two car parking areas. I am advised by the applicant that the car parking proposed accords with Kent County Council's maximum parking standards for secondary schools.
25. The smaller car park to the south would provide 25 car parking spaces for Trinity School staff, and would not be used by visitors or parents of pupils at either of the schools. The northern car park would be the main access point for both schools, and includes a 148 metre parent drop-off zone, 217 parking bays (including 24 parent parking spaces and 11 accessible bays), 13 motorcycle bays, and a coach parking/drop off area which has capacity for 8 buses and parking for 7 mini buses. Cycle stands proposed adjacent to the main entrance of the Grammar Annexe would accommodate 90 cycle stands (180 cycle parking provision). The cycle stand adjacent to the Trinity School would accommodate 50 cycle stands (100 cycle parking provision).
26. The submitted Transport Assessment also states that the development would include a new pedestrian crossing on Seal Hollow Road controlled by a school crossing patrol officer (to meet with the new pedestrian site entrance and the access boulevard), new wig-wag warning signals for existing school signs, additional 'School-Keep-Clear' markings and the installation of MOVA equipment to the A25/Seal Hollow Road signalised junction before 'student trigger levels' are met. The applicant further advises that the Grammar Annexe and the Free School would not be a capacity until September 2018 at the earliest.

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Landscaping

27. An Arboricultural Assessment/Survey has been submitted in support of this application. The Survey identifies a group of mature trees in the north west corner of the site and various mature trees along the western boundary of the site (Seal Hollow Road) including, Mature English Oak, Turkey Oak, Beech, and Sweet Chestnut. Trees amongst the buildings and car park tend to be younger with numerous Cherry, Birch, Sycamore, Field Maple, Norway Maple, Hornbeam, Italian Alder and other species planted. Nine individual trees have been classified as A category trees due to their significance culturally and ecologically including three Beech, two Oak, three Sweet Chestnut and one Turkey Oak. This includes T60, an Oak immediately adjacent to the sports centre, due to its notable veteran features which increase the potential habitat value of the tree. The proposed layout would ensure that all the grade A trees would be retained. The woodland habitat to the east of the site would be unaffected by the proposals as would the majority of trees to the site boundaries. I am advised that a total of 60 trees would be removed to accommodate the proposals (including some small groups), but that the applicant intends to replace these trees and provide replacement and additional planting as part of a detailed landscaping scheme. All trees to be retained within works areas will be protected during construction to BS5837:2012 'Tree in relation to design, demolition and construction'.

Ecology

28. An extended Phase 1 habitat survey has been submitted in support of this application, which has found that there is suitable habitat for nesting birds and bats on the site, and a potential reptile habitat on the southern boundary. The woodland to the east of the site (unaffected by the proposals) is suitable habitat for dormice and badgers. The applicant has further submitted a 'Method Statement for Works to Avoid Impacts on Wildlife', an 'Outline Ecological and Management Enhancement Plan', and a document titled 'Pre-Planning Ecological Issues'. These reports suggest that the proposal would not adversely affect protected species or their habitat, subject to adherence to the recommendations and conclusions.

Lighting

29. The existing floodlit MUGA would be retained and would not be affected by this application. There are no proposals for additional floodlighting on the site, but external lighting would be provided for security and access purposes. The applicant advises that the main entrance boulevard and plaza would be well lit by a combination of column and building mounted light sources, complemented by additional low-level luminaires along the approach. The building's approach would provide the adequate levels of night-time illumination in order to provide a safe and secure approach to the proposed buildings both for pedestrian and vehicular access. This would include lighting of the accessible parking areas. The applicant's intention is that external lighting would serve to reassure people on site by illuminating dark areas allowing a clear view ahead and would be designed to help to deter offenders by increasing the chances of being seen. All lighting will be in accordance with CIBSE (Chartered Institute of Building Services Engineers) guidelines.

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Security

30. The building and the site layout has been designed with Secured by Design principles in mind. For example, the following have been considered and included in the proposals:
- Avoidance of secluded areas, recessed entrances, alleyways or stairwells where potential assailants could be screened from view;
 - The provision of adequate lighting (see paragraph 29);
 - The front of the site is open to natural surveillance from residents and passers-by. The planting here, and other areas, should not interfere with surveillance or create concealed areas. This would be achieved by using appropriate planting and appropriate management to ensure that trees are suitably pruned up from the ground to prevent the canopy restricting surveillance or masking lighting;
 - In areas that are likely to attract people after hours and where natural surveillance is limited, the applicant would consider the provision of CCTV;
 - The choice of foliage to the car parks is particularly important to ensure that unattended vehicles are clearly visible and to remove the opportunity for concealed areas in which offenders can hide or attack a vehicle unseen.
 - There is quite a large provision for the proposed parking of cycles. Theft of cycles can often be a problem and so cycle shelters are proposed which are equipped with suitable fixed anchorage points to which cycles can be secured, with possible CCTV surveillance.
 - Car park barriers are to be used to prevent access to vehicles after hours to deter drivers congregating or from inappropriate driving / racing on site.

Sustainability

31. The applicant advises that 'designing for sustainability' has been integral to all aspects of the design. Orientation, construction materials and detail design have all been included within a coordinated strategy contributing to the building's performance, financial sustainability and environmental impact. Following the introduction of the 2006 & 2010 editions of the Part L of the Building Regulations it is now a requirement that all new buildings shall meet enhanced targets on carbon dioxide (CO₂). This reduction in CO₂ emissions is to be achieved by a combination of improved building efficiency and the inclusion of low and zero carbon (LZC) technologies. It is the applicant's intention to increase the building's energy efficiency by optimising the building orientation, its materials of construction and by embracing passive engineering solutions. The inclusion of appropriate LZC technologies will further reduce the carbon footprint of the scheme. In line with the requirements of Kent County Council and Building Regulations, the proposed buildings would achieve a 10% CO₂ reduction over Part L2A 2010 compliance. Both buildings would also achieve a BREEAM rating of Very Good. As well as enhanced basic construction technologies such as improved wall and roof insulation, the buildings are proposed to feature the following sustainable technologies:
- Passive and natural design solutions, including optimized solar orientation, ventilation and daylight.
 - Heating and cooling systems which use the exposed thermal mass of the building structure.
 - A 115kWp Photo Voltaic array on the roof of the buildings which would contribute approximately 90,000 kWh of renewable electricity per annum

The application is supported by a Design and Access Statement, Planning Statement, Transport Assessment, Travel Plan, Flood Risk Assessment and Surface Water Drainage Strategy, Outline Energy and Sustainability Statement, Arboricultural Impact Assessment, Phase 1 Contamination Assessment, Ecological Assessment, and a Statement of Community Involvement.

Planning Policy Context

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

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

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

- achieving the requirement for high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
- the great importance the Government attaches to Green Belts, with the fundamental aim of Green Belt Policy being to prevent urban sprawl by keeping land permanently open;
- minimising impacts on biodiversity, and protecting and enhancing valued landscapes, contributing to the Government’s commitment to halt the overall decline in biodiversity;
- promoting sustainable transport;

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

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

(ii) Development Plan Policies

Sevenoaks District Local Plan: Adopted 2000:

Policy EN1 - Proposals for all forms of development and land use must comply with the policies set out in this Plan, unless there are overriding material considerations. Scale, height, design, layout, retention of important

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features, residential and local amenity, access and parking are just some of the criteria which should be considered in the determination of a planning application.

Policy EN23 -Proposals for development or redevelopment within or affecting Conservation Areas should be of positive architectural benefit by paying special attention to the desirability of preserving or enhancing the character or appearance of the area and of its setting. The design of new buildings and alterations to existing buildings should respect local character, whilst the treatment of external spaces including hard and soft landscaping, boundary walls, street furniture and signs should be compatible with and enhance the appearance of the area

Policy NR10 – Proposals for all forms of development should minimise pollution of the environment through the careful design and layout of any buildings or land uses.

Policy VP1 – Vehicle parking provision in new developments will be made in accordance with KCC adopted vehicles parking standards.

Sevenoaks District Core Strategy: Adopted February 2011:

Policy LO1 - requires new development to be focused within the built confines of existing settlements.

Policy LO2 – seeks to control development within Sevenoaks and seeks protection of the setting of the urban area and the distinctive character of the local environment. New developments in the Sevenoaks Urban Area should respect the physical and community identity of adjoining settlements, and prevent further coalescence.

Policy LO8 – Seeks to maintain the extent of Green Belt, and conserve and enhance the countryside, including the distinctive features that contribute to the special character of its landscape and its biodiversity.

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

Policy SP2 - Sets standards for sustainable design and construction. Institutional development will be required to achieve a BREEAM rating of at least 'very good'. In order to achieve this the proposal will be expected to demonstrate 10% energy savings through renewable sources.

Policy SP9 - Where new development creates a requirement for new or improved physical, social and green infrastructure beyond existing provision, developers will be expected to provide, or contribute to, the additional requirement.

Policy SP10 – Promotes the provision of multifunctional green space by linking existing green space areas. The Policy also seeks the retention of open space, sports and recreational facilities, including outdoor sports facilities of

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value to the local community, unless any loss can be justified by additional provision of at least equivalent value to the local community.

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

Consultations

33. **Sevenoaks District Council**, following the receipt of the additional supporting information, comment as follows:

“Sevenoaks District Council recognises the long standing need for additional secondary school provision in the District. Subject to Kent County Council being satisfied that this need constitutes Very Special Circumstances and that Highway concerns previously raised can be addressed, we support the proposal.”

Sevenoaks Town Council, in commenting on the original application information, expresses concern at the following aspects of the planning application:

1. “ Due to the high density of pupils on the site, traffic flow in the immediate area would raise significantly at drop off and pick up times resulting in congestion. It is unlikely that this issue would be mitigated by modifications of the traffic lights at the Seal Hollow Road/A25 junction.
2. There does not appear to be sufficient parking on site to prevent parking congestion on the surrounding road network at pick up/drop off times.
3. The County Council do not appear to have looked at the pedestrian network which would serve the schools. With a significant amount of pupils living in the local area, there needs to be improvements to pedestrian access.
4. In relation to the above, concern is raised about the safety and suitability of pedestrian routes and crossings further afield from the school site. Upgrading of footpaths, including the upgrading of steps at the entrance to Millpond Woods and remedial works to the footpath from the site towards the A25, will need to be undertaken by the County Council to ensure safe pedestrian access.
5. Is there sufficient capacity in the local bus network to cope with an influx of children travelling to the area?”

Should the Town Council comment on the additional supporting information submitted, Members will be updated verbally at the Planning Applications Committee meeting.

Seal Parish Council no comments received to date following the original consultation, undertaken December 2013.

Kent County Council Highways and Transportation raises no objection to the application subject to conditions. The full response from Highways & Transportation is attached in Appendix 1, with the recommendation reading as follows:

“A key part of the mitigation for the traffic impact of the proposal is the staggered school hours. In principle this reduces the traffic impacts to those of the already-permitted school and a smaller school with earlier arrival and departure times. After consideration of all the relevant issues and the proposed mitigation measures we do not consider there are sufficiently justifiable grounds to raise any objection to the proposals subject to the planning conditions set out below.”

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1. Applicants to provide an On Site Traffic Management Strategy detailing for example provision of staff to direct traffic at the school entrance.
2. Details to be provided of cycle parking and access routes for cycles within the site.
3. Provision of cycle route signage to the school, for which plans to be agreed in writing with KCC Highways & Transportation;
4. All new accesses onto Seal Hollow Road to be provided with visibility splays measuring 2.4 metres x 50 metres, or other dimensions if agreed in writing with KCC Highways & Transportation, and these visibility splays to be maintained at all times free from obstructions higher than 1 metre above the carriageway surface.
5. Construction traffic management plan to be submitted and approved before commencement of construction;
6. School Travel Plans for both schools to be submitted and approved prior to opening.
7. A planning condition that the core start and end times of the two schools should be offset by 30 minutes or other time to be agreed in writing.

Other recommendations:

1. Minor changes are recommended to the parking layout to reduce the permeability in the vicinity of the site exit, in order to reduce the possibility of queues stretching back from the exit and onto Seal Hollow Road.
2. The western pedestrian island at the junction of the A25 with Seal Hollow Road should be lengthened and widened to at least 1.8 metres. This would provide increased pedestrian capacity and safety.
3. A signalised crossing should be provided across Seal Hollow Road outside the school. A signalised crossing would have a greater initial expenditure than a school crossing patrol, but would have lower running costs, and would be available to help pedestrians at all times including pupils from after-school clubs.”

Public Rights of Way raise no objection to the proposal.

Environment Agency raises no objection to the application subject to the imposition of conditions regarding the submission of a surface water drainage scheme, a remediation strategy to deal with the risks associated with contamination of the site, and a verification report setting out completion of the works set out in the remediation strategy. A further condition is required to ensure that the development is carried out in accordance with the submitted Flood Risk Assessment. Further advice and guidance is provided regarding waste on site, waste to be taken off site, and storage of fuels and chemicals, and it is requested that these matters be dealt with by way of informative.

Sport England does not wish to raise an objection to this application, subject to the imposition of a condition requiring the submission and approval of a Community Use Agreement prior to the first use of the development, and a condition requiring the completion of the replacement tennis courts, new sports hall, activity studio and changing rooms prior to the first use of the development. With regard to the later, these facilities must be fully operational and available for use.

The County Council’s Biodiversity Officer comments as follows:

“We have reviewed the additional ecological information submitted and we are largely satisfied that all previous points have been adequately addressed.

Bats

The submitted plans have been amended and the veteran tree (T60), which has suitable features for roosting bats, would be retained. As such we are satisfied that there is no

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requirement for emergence surveys to be carried out at this time. If any works need to be carried out on the tree in the future – an ecologist must be consulted prior to works being carried out to establish the works will impact roosting bats and identify if a bat survey is required. Trees T81, A, B and C have also been identified as having suitable features for roosting bats however they are not proposed for removal as part of the proposed development as such we are satisfied that no additional surveys have been recommended.

Lighting can have a negative impact on roosting, commuting and foraging bats. We advise that a lighting scheme is designed to have minimal impacts on bats and the Bat Conservation Trust's *Bats and Lighting in the UK* guidance is adhered to.

Reptiles

Additional information has been submitted detailing that as there would only be a small area of low quality habitat impacted along the southern boundary a precautionary mitigation approach is appropriate to clear the site. We are satisfied with this proposed approach but we advise that as a condition of planning permission, if granted, a detailed mitigation strategy is submitted for comments.

Enhancements

One of the principles of the National Planning Policy Framework is that “*opportunities to incorporate biodiversity in and around developments should be encouraged*”.

It is welcomed that the Ecology Zone would be created along the southern boundary as this would ensure that there is connectivity for species from the surrounding area to the Ecology Zone. We advise that if planning permission is granted a detailed Landscape and Ecological Management Plan (LEMPs) is produced for the whole site as a condition of planning permission. We suggest the following condition:

A landscape and ecological management plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority prior to the commencement of the development. The content of the LEMP shall include the following.

- a) Description and evaluation of features to be managed.*
- b) Ecological trends and constraints on site that might influence management.*
- c) Aims and objectives of management.*
- d) Appropriate management options for achieving aims and objectives.*
- e) Prescriptions for management actions.*
- f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).*
- g) Details of the body or organization responsible for implementation of the plan.*
- h) Ongoing monitoring and remedial measures.*

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The approved plan will be implemented in accordance with the approved details.”

The County Council's Landscape Advisor comments as follows:

“Previous comments made in relation to species choice and numbers have been adequately addressed in the supplied additional information.

Given that the:

- Scheme is altering the car park layout,
- Veteran trees have been identified,

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- The intention to retain trees within this area (something which we support)
 - And both demolition and construction being carried out;
- We would recommend a number of conditions to ensure retained and newly planted trees would be sufficiently protected. All construction and demolition activities should be undertaken in accordance with the British Standard (BS5837:2012).

Conditions

- Provision of a detailed Arboricultural Method Statement (AMS) explaining how the demolition would be carried out with regard to the retained trees.
- Submission of a scaled Tree Protection Plan (TPP) to be submitted and approved by KCC before any works (including demolition) begin. “

The County Council’s Conservation Architect no comments received to date.

The County Council’s Archaeologist raises no objection subject to a condition being placed on any grant of planning permission requiring the securing of the implementation of a programme of archaeological work, to be undertaken in accordance with a written specification and timetable.

The County Council’s School Travel Plan Advisor states that should permission be granted a condition of consent should require the submission of a detailed Travel Plan within 6 months of occupation of the development. It is also suggested that prior to occupation of the development the school produce and submit on ‘on-site traffic management plan’, to be prepared in consultation by Highways and Transportations Development Planning Team.

The Wildernesse Residents Association comment as follows (in summary). A full copy of the view of Wildernesse Residents Association is attached in appendix 2:

“We wish to emphasise from the outset that our planning objections are not raised against efforts to redevelop this site for educational purposes. We share popular support for that objective. Our objections relate to major planning issues relating to access, traffic congestion, and possible over-development, issues we feel are being poorly considered and are being allowed to go by default. As presently submitted we consider the development will - to the contrary - prevent these issues being addressed either from the outset or in the future.”

Kent Police Crime Prevention Design Advisor has no objection to the principle of the proposal in regard to crime prevention matters, but requests that should planning permission be granted, a condition of consent be imposed to require the submission and approval of details of ‘measures to minimise the risk of crime’, to accord with the principles and physical requirements of Crime Prevention Through Environmental Design. The approved measures should thereafter be implemented before the development is occupied and thereafter retained.

Local Member

34. The local County Member, Mr Nick Chard, was notified of the application on the 31 December 2013. The County Member for the adjacent Division, Mrs Margaret Crabtree, was also notified of the application on the 31 December 2013. Both County Members were also notified of the submission of additional supporting information on the 8 May 2014.

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Mr Nick Chard has commented as follows:

“I am a school governor at Knole Academy which is seen as competitive to the proposed Grammar School (Annexe) and Free School. I discussed this with Geoff Wild who, in his capacity as monitoring officer, agreed that I should not speak at the committee meeting due to my conflict of interest.”

Publicity

35. The application was publicised by the posting of 6 site notices, advertisement in a local newspaper, and the individual notification of 112 neighbouring properties. All those that wrote in regarding the application were also notified of the submission of additional supporting information on the 9 May 2014.

Representations

36. 14 letters of objection on the original application have been received as a result of publicity, including from the Parkfield Residents Association and the Sevenoaks Cycle Forum. 34 letters of support have been received, and a further 86 letters of support have been received from pupils of the existing Trinity Free School. In addition, at the date of drafting this report, a further letter from the Sevenoaks Cycle Forum, a further 2 letters of objection, and a further letter of support (ie, from the same addresses) have been received following further notification on the additional supporting information submitted, which included a supplementary Transport Assessment, further information with regard to ecological and arboricultural matters, and further details regarding the educational case of need. I have also received a letter of support from the Rt Hon Michael Fallon MP, Sevenoaks and Swanley, which will be summarised at the end of this section of the report.

A summary of the main planning issues raised/points of objection/points of support is set out below:

Access and Highway Matters

- Supports the proposal for the provision of two new secondary schools but object to the current access proposals in the strongest possible terms;
Vehicular Access
- The proposals involve some 2050 pupils and 220 staff. This would generate well in excess of 2000 extra traffic movements on roads that are already over capacity;
- As it stands, there are severe traffic problems on Seal Hollow Road especially at peak times. Adding this development will bring the road to a standstill;
- Sevenoaks is being surrounded by large school sites which are causing serious congestion and pollution at peak hours. This also leads to traffic using side roads and private roads to avoid the congested A25 and junctions;
- A detailed independent Traffic Assessment should be undertaken to support the proposals, assessing the full impact on the proposals on traffic congestion on the whole of Sevenoaks Town, the A25 and neighbouring roads;
- The submitted Transport Assessment is insufficient for a scheme of this size and nature;
- The proposals are for the existing accesses to the site to remain essentially unchanged, but clearly the proposed development envisages a very significant increase in vehicle and pedestrian flows;
- Seal Hollow Road is narrow in places, meaning that if 2 large vehicles need to pass traffic comes to a halt. Buses accessing the school would bring traffic to a standstill;

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- Additional traffic would add to the air pollution along the A25, and at the Bat and Ball junction, which is already a pollution black spot;
- The totally inadequate provisions at the Bat and Bull/A25 junction aggravate the congestion at the Seal Hollow Road/A25 junction, and increase the number of vehicles using Seal Hollow Road as an alternative access to Sevenoaks;
- Accidents on the A25 appear to have been ignored;
- One solution to the problems would be to replace the traffic lights at the Seal Hollow Road/A25 junction with a roundabout/gyratory, and to provide direct vehicle access into the new school from this. A signal controlled school crossing could then be provided on Seal Hollow Road. The roundabout would take only a small piece of land from the north west corner of the site;
- The redevelopment of this site is likely to take place at the same time as a potential major development and conversion of the nearby Wildernesse House (formally Dorton House). This would create a substantial increase in heavy traffic movements on the A25;

Pedestrian access

- The Wildernesse School for Boys Travel Plan identified issues/concerns with 1) pupils crossing Seal Hollow Road, 2) Pupils safety when going to cars/buses at the end of the school day, & 3) Increasing the number of pupils who cycle and walk to school. It also noted that ‘a number of pupils have actually been hit and injured by vehicles’ and that the school had made a number of applications to the District Council for a pedestrian crossing but had not been successful. In short, the access facilities for the former Wildernesse School were identified as being inadequate for the number of staff and pupils at that time. The same access provisions for the two new schools, therefore, can surely only be seen as totally inadequate;
- Pedestrian access to the site has not been considered. Infact, the introduction of a signalised pedestrian crossing phase at the Seal Hollow Road/A25 Junction has been discounted in the application documentation as it ‘would increase delays to motorists’. Pedestrians would be ‘endangered’;

Pick up/drop off

- No consideration is given to what would happen to parent drop off and pick up;
- An extra school pick up/drop off facility should be provided at the Seal end of the school site;
- At the very least, controlled parking should be introduced in the surrounding residential streets;
- Staggered opening and finishing times will just extend the period of time over with ‘traffic chaos’ would occur;
- The staggered start and finish times should be wider apart than 30 minutes;

Cycle Access

- The submitted Transport Assessment and Travel Plan make no reference to the Sevenoaks District Cycle Strategy (prepared by Kent County Council Highways & Transportation, Sevenoaks District Council, and Sevenoaks Cycle Forum in 2011 and was approved by the Joint Transportation Board in March 2012). The strategy includes a proposed ‘school-friendly’ cycle route across the north of Sevenoaks, linking primary and secondary schools, which at its eastern end would terminate at the Wildernesse site (Riverhead School marks the western end). The route follows residential streets and footpaths, providing an alternative to the A25. Sevenoaks Cycle Forum are disappointed by this omission as it is the view of the Forum that the implementation of this route would play a vital part in meeting the goals of the Travel Plan for the Wildernesse site. Without the implementation of the route, there is no safe route to the school by bike and cycling on many roads, including the A25 is hazardous. A pedestrian and cycle access to the site should also be provided at the eastern end of the site, towards Seal;

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Design/Massing/Siting

- The four storey buildings are far too high;
- The proposals represent significant overdevelopment next to one of Sevenoaks most treasured Conservation Areas;
- The school site is within the Green Belt and a doubling of the number of pupils on this site and the significant development is completely inappropriate and damaging to this important landscape;
- The site has inadequate sports facilities to support two schools;

General Matters/Amenity Concerns

- There is significant surface water flooding along Seal Hollow Road and along the A25 after modest rainfall. The large increase in hard surfacing on the site would increase the risk of flooding;
- Part of the site is within a flood risk zone, and any development would exacerbate an already sensitive flooding position;
- It is considered that the proposed development has been well developed/designed to limit its impact on the surroundings, but concern is expressed that further development on the site in the future would undermine this. Some site specific development restrictions or assurance that the new buildings would not get planning permission to extend to the south or increase in height could address this;
- The existing fence to the south of the site, between the school site and 'Greensleeves' is in a poor state of repair. A secure boundary needs to be provided, which should also offer year round screening. Existing trees on this boundary do not provide low level screening. A secure boundary should be established, and year round screening provided (wooden fence or hedge);
- Screening should be provided along the southern site boundary with 'Greensleeves' during construction works;
- The Department of Education has turned down the proposals for the Grammar Annexe. Is it technically possible or desirable to grant permission to build this school?
- The plans should be redrafted to make better use of the site for the Free School as the Grammar Annexe may never get permission from the Department of Education;
- The consultation by the Education Authority and the Planning Authority has been poorly publicised;

Support

- This is a thoroughly researched and compelling proposal to build two much needed state secondary schools in Sevenoaks;
- Tonbridge and Tunbridge Wells parents each have a choice of six state secondary schools in their towns. Sevenoaks parents only have one;
- Over 2000 children leave Sevenoaks every day to attend secondary schools, at a great cost in terms of time, money and traffic pollution;
- The existing school site is a 'derelict eyesore' and should be redeveloped to benefit the local community and the pupils of Sevenoaks;
- Many parents of pupils/prospective pupils at Trinity School have written in support of the proposals. The new Christian School is in temporary buildings and needs to relocate to the Wildernesse site as a matter of urgency due to space constraints. The current temporary buildings are not designed for educational use, and there are no outdoor or sports facilities. Parents express their satisfaction with the school and the importance of having a faith school within Sevenoaks.

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- Pupils of Trinity Free School have expressed their support for the proposals. Their existing accommodation is not designed for educational use and the pupils look forward to benefiting from science labs, sports facilities (including playing fields), and purpose built education facilities, with appropriate IT etc. According to external verification, Trinity School is 'outstanding' and the new facilities would enable such excellent education to be available to further pupils in the Sevenoaks area. Current facilities can only cater for 240 pupils, and will reach capacity next year.

In addition, I have received objections to the proposal from the Knole Academy Governing Body. A summary of the main planning issues raised/points of objection is set out below:

- It is believed that the educational case of need is flawed as they do not take into account the large number of vacant places in the north of Sevenoaks, not all the schools in Tonbridge/Tunbridge Wells with spare places;
- When planning Knole Academy, KCC's own process for commissioning (2009) was clear that the size of Knole Academy would meet the secondary education needs of the area;
- Very Special Circumstances do not exist as the educational need is flawed;
- The buildings proposed would have a significant impact on the surrounding area in terms of size and scale;
- Knole Academy was relocated to the west campus for a number of reasons, one of which was the Seal Hollow Road/A25 road junction. Knole Academy believe that the development as proposed would cause gridlock at the start and end of the school day, having a significant impact on the punctuality of the Knole Academy students.
- To say that additional traffic congestion will take place over time is not a reason to support the scheme;
- Staggered start and finish times is a naïve approach, parents will drop off children as and when is convenient, and buses run specific cost effective schedules and will continue to do so according to business principles. Moreover, it is not effective nor environmentally friendly to run two different bus services to the same place;
- There is only space for 8 buses on site, with over 2000 pupils;
- It is disingenuous to use the travel plan for Knole Academy in 2011. Despite the rhetoric of local schools, many children will commute to attend a grammar annexe or an ecumenical Christian School;
- There were accidents on Seal Hollow Road involving students from Wildernesse School in the last 10 years, at a time when the school roll was falling so significantly fewer pupils on site;

Knole Academy Governing Body also raise the following:

- The planning application is submitted by Kent County Council (KCC), and will be heard by a KCC Committee, raising significant interest concerns;
- The applications lodged for a Grammar Annexe have been turned down by the Secretary of State, Michael Gove, as being unlawful. Therefore, the building of a Grammar Annexe as per the planning application is in direct contravention of the Secretary of State for Education's decision;

I have received support for the proposals from the Governing Body of Amherst School, (a Junior School in Riverhead) and St John's Church of England (VC) Primary School, Sevenoaks. A summary of the main planning issues raised/points of support is set out below.

- Fully support any building development that provides additional secondary places, selective or non-selective, for Sevenoaks Children;

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- In excess of 1900 children (more than 75%) commute from their homes in Sevenoaks to school in Tonbridge/Tunbridge Wells. These commutes of between 15 and 25 miles are excessive and time consuming;
- This application is seeking to provide two new secondary schools in Sevenoaks for local Sevenoaks children, to the benefit of children in terms of a much shorter and relaxing journey to and from school;
- The application documents cite KCC projections of growth in the school age population in Sevenoaks. This is already evident at local primary schools, the following of which have expanded in the last 3 years:
 - Seal Primary School (new build to accommodate increased entry in Yr 1)
 - St John's CofE Primary School (now fully subscribed with 208 pupils. 3 years ago the school had 60 pupils)
 - Sevenoaks Primary School (expanded from 2FE to 3FE)
 - Lady Boswell's School (expanded from 1FE to 2FE)

Many other primaries in villages across the District also continue to increase their intake. This surge in pupils will hit secondary schools in a few years time;

- KCC projections do not factor in new housing development in the area. Construction is currently underway for 500 new homes in Dunton Green, and 450 homes are proposed on the Fort Halsted site. Inward migration to fill these new homes can only increase the school age population.
- Without the establishment of a Sevenoaks Grammar Annexe, local children who pass their 11-plus test will be denied places at West Kent Grammar Schools because they will be living outside of the ever shrinking catchment areas;
- This problem was highlighted in March 2012 when around 100 pupils passed their 11-Plus but were not offered a West Kent grammar school place. Without additional capacity this problem will only get worse;
- The proposals will increase Sevenoaks' paternal preference. Over 40% of primary schools in the Sevenoaks District are faith based, yet the nearest faith based secondary school was 12 miles away in Tunbridge Wells, and massively oversubscribed. Trinity Free School gives parents a local faith based school;
- There is overwhelming local support for a Grammar School in Sevenoaks, and on 29 March 2012, 66 out of 70 Kent County Council Members voted in favour of creating grammar school places in Sevenoaks. Mr Gove's legal ruling hinged on the issue of a girls' grammar school being the sponsor for a Sevenoaks Annexe for both girls and boys. Efforts are continuing to resolve this;

The letter(s) of support does, however, state that certain aspects of access and highway safety should be addressed up front. These are as follows:

- Pedestrian access – there is no crossing on Seal Hollow Road or the A25, and long sections of both roads have no pavement and/or only a pavement on one side;
- Vehicle access – the southern site exit from the Trinity School has poor visibility and feels very unsafe. Further review of this exit is recommended;

I have also received a letter of support from the Rt Hon Michael Fallon MP, Sevenoaks and Swanley. A summary of the main planning issues raised/points of support is set out below:

- Sevenoaks is the only major town in Kent without a grammar school, which is a long running grievance amongst parents and pupils, as evidenced by a 2012 petition signed by more than 2000 people;
- Sevenoaks children find it harder to secure a grammar school place, but if they do, have to travel a considerable distance to take it up;
- The County Council's figures from 2009 show that 91 out of 253 pupils who passed the 11+ in Sevenoaks did not get any of their four preferences on National Offer Day;

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- Recent figures show that 1,151 students who live in south Sevenoaks travel to selective schools in Tonbridge/Tunbridge Wells, or further afield, as there is no selective provision in Sevenoaks. Moreover, as the number of Year 7 pupils increases in these schools, the application of distance criteria through the admissions process will result in selective provision becoming increasingly less accessible for Sevenoaks south students;
- Non-selective schools are able to expand to meet increased demand. It cannot be fair that those choosing selective schools are discriminated against because the system cannot similarly accommodate them;
- The obvious solution is to provide new grammar school places in Sevenoaks itself.

Discussion

37. In considering this proposal regard must be had to the Development Plan Policies outlined in paragraph 32. Section 38(6) of the 2004 Planning and Compulsory Purchase Act states that applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. Therefore, this proposal needs to be considered in the context of Development Plan Policies, Government Guidance, including the National Planning Policy Framework (NPPF), and other material planning considerations arising from consultation and publicity. Issues of particular relevance include impact upon the Metropolitan Green Belt, siting, massing & design, impact upon the adjacent conservation area, highway implications and access, and whether the development is sustainable in light of the NPPF.
38. Policy EN1 of the Sevenoaks District Local Plan, and Core Strategy Policy SP1, seek to conserve and enhance the environment and require development to be well designed and respect its setting. This is particularly relevant to this site which is identified within the Sevenoaks District Local Plan as being within the Metropolitan Green Belt. Policy LO8 of the Sevenoaks District Core Strategy seeks to resist inappropriate development within the Green Belt, unless justified by exceptional circumstances. Reference is made to PPG2 which has been replaced by the NPPF. The NPPF says “as with previous Green Belt Policy, inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances”. The NPPF does not explain in any detail what ‘very special circumstances’ means, but does go on to say “very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations”. Any built development within the Metropolitan Green Belt could affect the openness of it and would be contrary to planning policies. On this basis the development proposed must be considered as a departure from the Development Plan. Therefore, if Members were minded to grant planning permission, the application would need to be referred to the Secretary of State for his consideration.

Green Belt Considerations

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

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

40. A 'planning statement' was submitted in support of this application, which sets out what the applicant considers to be the very special circumstances that warrant setting aside the general presumption against what would be inappropriate development in the Green Belt. The applicant considers the following 'very special circumstances' are sufficient to collectively outweigh any Green Belt policy objection:

- i) The identified education need and operational need for additional secondary schools places in Sevenoaks;
- ii) A lack of suitable alternative development options;
- iii) The extent of community and sustainability benefits the proposal would deliver; and,
- iv) The quality of the design and level of mitigation proposed that would ensure that the impact on the openness of the Green Belt would be substantially limited in comparison to the existing school site.

Each of these 'very special circumstances' as put forward by the applicant will be considered and discussed in the following section of this report. I will take each point in turn, first considering the case of need for additional secondary school places in Sevenoaks.

Case of need

41. As outlined in paragraph 32 of this report, great emphasis is placed within planning policy generally, specifically paragraph 72 of the NPPF, on the need to ensure a sufficient choice of school places is available to meet the needs to existing and new communities. The NPPF states that Planning Authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. The NPPF further states that Planning Authorities should give great weight to the need to create, expand or alter schools. The Policy Statement – Planning for Schools Development (15 August 2011) further sets out the Government's commitment to support the development of state funded schools and their delivery through the planning system. In addition, Sevenoaks District Core Strategy contains planning objectives that seek to protect existing school sites and support the improvement of facilities where necessary. In particular, Policy SP9 of the Core strategy seeks to support the development of infrastructure facilities required to resolve existing deficiencies, with the definition of 'infrastructure' encompassing education and community facilities.

42. Sevenoaks has a long history of students commuting long distances out of town to pursue secondary education. The applicant advises that Sevenoaks District is divided into two educational 'parts', north and south, and each 'part' has a 'travel to school area'. In the northern part of the District, nearly all students attend Orchard Academy in Swanley, Hextable School (Oasis Academy), or the selective and non-selective schools in Wilmington and Dartford. In the southern part of the District however, 98.5% of students either attend Knole Academy or the selective and non-selective schools in Tonbridge and Tunbridge Wells. The applicant advises that the 2012 roll count indicates that there is a total of 2,474 Year 7-11 students resident in Sevenoaks south, who attend schools as follows:

- 588 (23.8%) attend non-selective schools in Sevenoaks District (nearly all attend Knole Academy);
- 1,138 (46%) attend selective schools in Tonbridge or Tunbridge Wells;
- 712 (28.7%) attend non-selective schools in Tonbridge or Tunbridge Wells;

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- 36 (1.5%) attend non-selective schools outside of Sevenoaks, Tonbridge and Tunbridge wells.

43. On the basis of the figures above, out of a total of 2,474 Year 7-11 pupils who live in Sevenoaks south, 1,886 (76.2%) travel outside of Sevenoaks to attend a Secondary School due to insufficient local capacity, 1,138 to attend selective schools and 748 to attend non-selective schools. This clearly demonstrates an existing need for further Secondary School places within the Sevenoaks south area.
44. In addition, and as noted in the letters of support, particularly those from local primary schools, a number of primary schools in Sevenoaks Town and the surrounding villages, including Lady Boswell's, St Johns Primary School, Sevenoaks Primary School and Otford Primary School, have expanded in recent years as part of the County wide Basic Needs Programme. In fact, many of the expansion proposals has been considered and approved by Members of the Planning Applications Committee in the recent past. These expansions are to cater for an increase in primary school pupil numbers, with the intake of pupils doubling in some cases. This surge in pupil numbers is working its way through the primary school system and will reach secondary schools in the near future. This further adds to the case of need, with not only existing pupils of secondary school age having to commute out of the District, but a future demand that will outstrip supply and add to the daily commute of pupils.
45. With regard to future demand, the applicant states that there are two separate forecasts that corroborate the demand for additional Year 7-11 schools places within Sevenoaks South - residential based forecasting and school based forecasting. Residential based forecasting shows that the number of Year 7 students in the Sevenoaks South area will increase from 562 in 2012-13, to 681 in 2017-18, with significant housing development in the District expected to increase those numbers over and above the forecasts. School based forecasting (which uses the Year 7 forecasts for all schools in the 'travel to school area' that Sevenoaks South children attend) also indicates an increase in Year 7 numbers within the Tonbridge and Tunbridge Wells Districts, meaning that schools within Tonbridge and Tunbridge Wells will experience demand significantly over their existing capacity from pupils living within Tonbridge and Tunbridge Wells, reducing the likelihood of pupils in Sevenoaks being offered a place. It should be noted that many primary schools in Tonbridge/Tunbridge Wells have also been expanded under the Basic Needs Programme to cater for increased pupil admission numbers, which further supports this case of need. The applicant has provided a forecast for the 12 schools that more than 95% of the pupils in the Sevenoaks South area attend, which identifies that all of them are expected to experience demand over capacity, with a shortfall in places for the Sevenoaks South 'travel to school' area forecast to be approximately 10 forms of entry (FE) by September 2018. This forecast supports the case of need identified by local primary schools, which have experienced a dramatic increase in pupil admission numbers in recent years.
46. The applicant is proposing to meet the forecasted 10FE shortfall in secondary school places by providing accommodation for Trinity Free School, enabling it to expand to 4FE, and the provision of a 6FE Grammar Annexe. With regard to Trinity Free School, this existing school is already popular with pupils and parents alike and is in temporary accommodation which is not fit for purpose in addition to being at capacity. The applicant advises that over 40% of pupils in the Sevenoaks South area attend faith based primary schools, yet the nearest faith based secondary school (excluding Trinity) is 12 miles away and three times oversubscribed. In addition, the figures in paragraph 42 above also demonstrate that a significant number of pupils within the Sevenoaks South area commute daily to non-selective schools in Tonbridge and Tunbridge Wells.

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As outlined above, these schools will experience demand over capacity in the near future as the number of Year 7 pupils rises as the surge in pupil numbers progresses through the education system.

47. Notwithstanding the additional 4FE provision that would be provided by Trinity Free School, the applicant is firmly of the view that there is a need to commission 6 FE of selective co-educational provision in the Sevenoaks South area by 2017. As can be seen by the figures in paragraph 42 above, 46% of Year 7 – 11 students in the Sevenoaks south area attend selective schools within Tonbridge or Tunbridge Wells. The representations received in support of this application emphasise the case of need, with Sevenoaks being the only major town in Kent without a Grammar School. Nevertheless, it is stated by local primary schools that not all pupils who pass their 11+ currently get offered a place at a grammar school even outside of the District, and that this situation will only worsen over time as pupil numbers grow, meaning selective schools in Tonbridge and Tunbridge Wells will have to reduce their catchment areas to cater for local demand.
48. Based on the above, in my view it is evident that a clear case of need for additional selective and non-selective secondary school places within the Sevenoaks South area exists, which is largely within the Metropolitan Green Belt. Its needs to be borne in mind that the Green Belt covers a wide area where people live and that these people need local school facilities just as much as those outside of the Green Belt. The applicant has provided both existing and projected figures which demonstrate an existing shortfall within the Sevenoaks South area, and a future need which will be outstripped by demand unless additional places are provided. Support for the provision of school places is heavily embedded in the NPPF and local planning policy, and I consider that the need for the development should be given significant weight in this instance. Having accepted a need for additional secondary school places with the Sevenoaks south area, it is now important to consider how these places would be provided.

Alternative Development Options

49. As part of the applicant's case of very special circumstances, alternative development options have been assessed and the applicant has concluded that there are two options - option 1 being to 'do nothing' and option 2 being to find an alternative less sensitive development site.
50. The applicant concludes that option 1 does not represent a feasible solution as it would prohibit the change in the standard and level of local education required to meet the education need, as discussed above. Doing nothing would not address existing and future demand for additional selective and non-selective secondary school places within the Sevenoaks South area. Having accepted the case of need for such places, I consider a 'do nothing' approach to be unacceptable as it would not provide the educational facilities required, which is not in accordance with the underlying principles of Development Plan Policy or sustainable development. Therefore, the second option of 'finding an alternative less sensitive development site' must be considered and assessed.
51. Option 2 requires finding a suitable less sensitive site (i.e. non Green Belt site) to accommodate the development proposals. The applicant advises that a list of search parameters was set out to assist in undertaking a desk-top exercise regarding the identification of a potential alternative site. These parameters were as follows:
 - *Search Area; non Green Belt sites within Sevenoaks.*

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- *Available; currently available sites on the land and property market.*
- *Suitable; sites with a reasonable potential to accommodate the development (7/8 ha).*
- *Deliverable; sites with no significant environmental or financial constraints that would prohibit the delivery or implementation of the proposal.*

52. The applicant advises that despite undertaking discussions with established local land agents, and a significant online search exercise, it has not been possible to identify any currently available sites on the property market that might be considered suitable to accommodate the proposed development. Most, if not all, currently available sites had to be discounted immediately given their insufficient size. The applicant further advises that to provide the development across two or more sites would undermine the benefits triggered by co-locating the schools in respect of shared services, sustainability and securing the redevelopment of the Wildernesse School site.
53. The applicant therefore concludes that it has not been possible to identify any other less sensitive sites in Sevenoaks which are currently available, suitable or deliverable for the development of the two co-located schools. In my view, it would not be appropriate to search for further alternative sites within the Green Belt as this would have no material benefit when compared to the current application site. In addition, I also consider that the application site represents the most suitable location to accommodate the proposed development in considering its established educational use, and the need to redevelop the site which is currently vacant in terms of use, with low quality educational buildings, many in a poor physical condition. Lastly, the applicant advises that, notwithstanding the above, relocating to an alternative site would present significant logistical and financial cost, not least from potential site acquisition, which could prejudice the viability and deliverability of the entire proposal.
54. In summary therefore, and having considered the above, I am satisfied that the applicant has taken all reasonable endeavours to locate a less sensitive alternative site. The 'do nothing' approach is unacceptable given the case of need, and a lack of alternative sites leads me to conclude that development of the Knole (east) Academy site (former Wildernesse School site) is the only viable option in this instance. The site is available, suitable, deliverable and in the correct location to address the need for additional Secondary School places in the Sevenoaks south area. Moreover, the site has an established educational use, and is previously developed land within the Green Belt. In light of the above, I consider the redevelopment of the application site to be the most appropriate solution in this instance. Having accepted the need for the development, and the suitability of the proposed application site, the following sections of this report will concentrate on the very special circumstances put forward by the applicant with regard to the redevelopment of the application site itself.

Wider Community and Sustainability Benefits

55. The applicant considers that the proposed development would lead to several demonstrable community benefits. The first of these is the improved educational facilities that the proposals would provide, enabling greater parental choice, and both selective and non-selective education facilities within the Sevenoaks South area. A more direct community benefit would be the improved facilities, which would not only be available to pupils, but to the wider community. These facilities would include a refurbished sports hall, an additional 4-court sports hall, the replacement of the existing substandard tennis courts with two new Multi Use Games Areas, and various non-sporting facilities such as theatres, libraries and large meeting areas.

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56. With regard to the sustainability benefits, as previously discussed within this report, a large proportion of students from the Sevenoaks South area currently have to travel some considerable distances to attend schools out of the District. This is unsustainable from an environmental perspective. The application as proposed seeks to provide both selective and non-selective secondary school places within the Sevenoaks south area, removing the need to local pupils to travel out of the District to obtain the necessary level of education. Furthermore, the proposals make provision for an extensive number of cycle spaces, a dedicated bus parking area, and improved pedestrian access facilities. The applicant considers that these attributes, in conjunction with the implementation of the School Travel Plan (to be discussed later in this report) would secure a highly sustainable development at both strategic and local levels.
57. Although both of the above are positive attributes of the scheme as proposed, and do go some way to support the redevelopment of this Green Belt site, I do not consider that these benefits on their own would outweigh the presumption against inappropriate development within the Green Belt. I therefore consider that the impact of the development as proposed on the openness of the Green Belt needs to be addressed, which, in conjunction with the above, may collectively outweigh the harm to the Green Belt.

Impact on the Openness of the Green Belt

58. This development opportunity is unusual in that the existing school site is vacant and, therefore, the existing buildings can be demolished and the new buildings built upon existing areas of hardstanding. Most developments of this scale typically are seeking to provide replacement facilities on an existing operational school site and, therefore, new buildings have to be built on existing open areas of the site, and old buildings demolished upon decant into the new facilities. As detailed in paragraphs 10 and 11 of this report, the development as proposed would provide a total of 17,386sq.m gross external floor area, including the retained sports centre, whereas the existing buildings on site has a gross external floor areas of 10,312 sq.m. It is accepted, therefore, that the proposed development would lead to an intensification of use of the site, and an increase in on-site building massing. However, the applicant considers that a carefully thought-out high quality design and a package of appropriate mitigation measures substantially limit the impact of the proposal on the openness of the Green Belt, especially when compared to the previous school buildings.
59. First, it is important to note that the existing site is well screened from public views by mature trees and other forms of soft landscaping along all of the site boundaries. The development proposals intend to enhance the boundary treatment, maintaining and improving this level of screening. The applicant is also of the opinion that the development as proposed would enhance the overall appearance of the site, which although not relevant to the openness of the Green Belt and its functioning, is relevant when considering the character and appearance of the site.
60. The existing buildings on site are primarily situated in the south western corner, with the building heights staggered with single storey blocks closest to the site frontage with Seal Hollow Road, and two storey buildings behind, further into the site. The north western section of the site is predominately occupied by sports facilities, including tennis courts and a flood-lit all-weather pitch. The eastern half of the site is home to existing playing fields and an area of woodland, both of which would be unaffected by the proposed development. The applicant proposes to retain all built development in the western half of the application site, upon the broad footprint of the existing buildings. It is important to note that the Green Belt boundary runs around the boundary of the

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application site on the north, west and southern sides, with the eastern site boundary being the only boundary that links to the Green Belt beyond. The undeveloped eastern half of the school site would not be encroached into by the development proposals, resulting in the retention of the physical link of open space within the school site and the wider Green Belt beyond. By containing the development to the western half of the school site, adjacent to the built development of Sevenoaks, and upon the broad footprint of the existing built development, the functioning of the Green Belt would not, in my view, be adversely affected by the development proposals in principle. However, further details of the scale and massing must be considered in more detail.

61. The development proposals involve the 'rationalisation of the existing school accommodation' to provide two modern fit for purpose educational buildings. As noted above and in paragraphs 10 and 11 of this report, the proposed development would result in an overall increase in floorspace across the site. However, the existing school buildings have a total footprint of 8,778 sq.m, whereas the proposed development would have a total footprint of 8,128 sq.m (both totals include the sports centre which is to be retained). The development as proposed would therefore result in an approximate 7.5% reduction to the overall built footprint on the site, and 650 sq.m reduction. In the context of the impact of the proposals on the openness and functioning of the Green Belt, I consider this reduction in footprint to be a welcome element of the proposal, returning more of the site to two dimensional development, enhancing the perception of openness. The existing buildings on site are sprawled out in an unattractive arrangement, whereas the development as proposed would provide two purpose built rationalised school buildings, with clear separate identities.
62. However, that reduction in footprint is achieved by proposing buildings of a larger massing and scale than those currently on site. As outlined in paragraphs 16, 17 & 18 of this report, the proposed replacement buildings are a mix of two, three and (in a small part) four storeys. However, the applicant considers that the two buildings would have a limited impact on the openness of the Green Belt, and have been carefully sited and designed to minimise the visual impact of the development when viewed from outside of the site boundary. The siting and massing of the development in residential amenity terms will be considered later in this report, but in terms of siting and massing and the impact on the openness of the Green Belt, the applicant has carefully designed the scheme to take account of levels across the site, use of landscaping to screen and enhance the development, and careful selection of materials and elevational treatments.
63. The cross sections submitted with this application give the buildings some context and show how the buildings would relate to the street level at Seal Hollow Road. Trinity Free School would be the closest element of the scheme to the site frontage, and the applicant has designed the building so the front of the building, on the highest plateau on site, is 2 stories in height. The levels on site drop as you move further away from the site frontage with Seal Hollow Road, so that as the storey height of the Trinity building increases, the drop in levels gives the impression of a building of 2.5 storeys in height, rather than the 3/in part 4 storey actually proposed. A building of this scale is now typical of modern educational establishments and, in my view, has been designed in such a way as to mitigate any perception of an inappropriate massing and scale. With regard to the Grammar Annexe building, this building is proposed to be located towards the centre of the site, on the middle plateau, separated from Seal Hollow Road by existing and proposed car parking and, in part, by the proposed Trinity School building. Although this building would be 3 storeys in height, due to the degree of separation from Seal Hollow Road and the context within which it would be viewed, I do not consider

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that the massing of this building would be inappropriate or out of context with surrounding local development.

64. Whilst the development proposals would inevitably have some impact on the Green Belt, I consider that the new buildings, and associated car parking and sports facilities, would be well contained within the immediate context of the existing school site, and that the impact of the proposals on the openness and functioning of the Green Belt would be limited. It is also of note that the large majority of the school grounds would continue to remain undeveloped or open in nature, reducing the overall impact of the development on the character of the site and its surroundings. As also noted above, the contribution made by the site to the Green Belt (which extends to the east) would, in my view, be unchanged by the development, with the open area of the site retained to the east, and built development on the broad footprint of the existing to the west, where it adjoins the built development of Sevenoaks.

Summary – Very Special Circumstances/Green Belt Considerations

65. Overall, I accept the applicant's assessment and application of Green Belt Policy as set out in the submitted documentation, and I have considered this in the context of the amended policy following publication of the NPPF. The development is inappropriate development for the purposes of Green Belt consideration and is, therefore, by definition harmful. Nevertheless, in my view, the considerations summarised above are sufficient collectively to constitute 'very special circumstances' capable of outweighing the harms identified in this particular case. Furthermore, I accept that the particular siting and design of the proposals has been carefully considered to help mitigate the impact of the development on the functioning and openness of the Green Belt. Accordingly, I do not consider that an objection on Green Belt grounds would be warranted in this particular case. If Members were minded to grant permission, the application would need to be referred to the Secretary of State for Communities and Local Government for his consideration before permission could be granted.

Siting, Massing and Design – Conservation and General Matters including Residential Amenity

66. Having accepted the siting and massing of the proposed facilities in Green Belt terms, the siting, massing and design must also be considered in terms of residential and local amenity. The siting has not met with objection, which is a result of a significant amount of pre-application discussion undertaken by the applicant (including with local residents), which resulted in the development being moved further away from the southern boundary and some further design changes prior to the submission of the application. 'Greensleeves' is the property to the direct south of the proposed development, and is the closest property to the proposed buildings on site. The occupants of 'Greensleeves' have submitted representations on this application, and have sought the following:
- Concern is expressed that further development on the site in the future could undermine the carefully developed and designed scheme currently proposed. Some site specific development restrictions or assurance that the new buildings would not get planning permission to extend to the south or increase in height could address this;
 - The existing fence to the south of the site, between the school site and 'Greensleeves' is in a poor state of repair. A secure boundary needs to be provided, which should also offer year round screening. Existing trees on this boundary do not provide low level screening. A secure boundary should be established, and year round screening provided (wooden fence or hedge);

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- Screening should be provided along the southern site boundary with 'Greensleeves' during construction works;
67. With regard to the first point, I must advise that the School (or others) could submit a planning application for further development in the future. However, given the nature of the proposals and the purpose built school building that would be provided, which would include all of the necessary and required facilities and space for a school of this size, I consider it unlikely that the School would wish to extend in the foreseeable future. Should the School wish, however, to extend to the south and/or upwards in height a planning application would be required which would have to be considered on its own merits at that time. However, due to the constraints of the access and car parking facilities around the Trinity School buildings, I consider it highly unlikely that the school would or could extend to the south.
68. As the occupants of 'Greensleeves' state, the existing fence to the south of the site, between the school site and their property is in a poor state of repair. The occupants of the property consider that a secure boundary should be provided, which should offer year round screening as the existing trees on this boundary do not provide low level screening. It is therefore requested that a secure boundary be established, and year round screening provided (wooden fence or hedge). I consider this request to be more than reasonable given the nature of the proposals, and the applicant has confirmed in writing that as part of the proposals, a replacement fence would be provided along this southern boundary. However, no details of such a fence have been provided at this stage, and the applicants request that this matter be dealt with pursuant to planning condition, should permission be granted.
69. Little detail has been provided with regard to fencing, gates and means of enclosure across the site, so I consider it appropriate that, should permission be granted, details should be submitted pursuant to condition for written approval. Such details must include the height, exact location, specification, material and colour finish to the fencing, gates and means of enclosure across the site. In addition, given the fact that 'Greensleeves' directly adjoins the school site, and in essence shares a common boundary line, I consider that the applicant should consult with the occupants of that property to agree the proposed fencing to the southern boundary prior to submission of the details. The occupants would also be consulted on the submitted details to ensure that the details are acceptable.
70. With regard to the required screening during construction works, I consider this to be appropriate, and will discuss this in further detail in the 'construction' section of this report.
71. 'Greensleeves' would be the closest property to the proposed built development on site, specifically the Trinity Free School building. However, the nearest part of the Trinity School to the closest elevation of 'Greensleeves' would be 29.3 metres, and that part of the Trinity School would be the two storey sports hall, with no windows in either the south or west elevations. That distance is beyond the Kent Design Guidance acceptable window to window distances, and furthermore is at an oblique angle to rear facing windows of 'Greensleeves'. The boundary here is also screened with existing tree planting, which offers high levels screening. Subject to the condition outlined in paragraph 69 above, which would secure low level screening and a secure boundary line, I am satisfied that the proposed development would not have a significant impact on the amenity of the occupants of 'Greensleeves'. In addition, due to the distance to other neighbouring properties, the level changes on site and the existing and proposed planting and screening around the site, I do not consider that the buildings proposed

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would lead to any undue overlooking of neighbouring properties, or would be overbearing in nature.

72. Further representations received suggest that four storey buildings are far too high, and that the proposals represent overdevelopment of the site. It is also noted that part of the southern boundary of the application site is adjacent to the Wildernesse Conservation Area. First, with regard to four storey development, only a very small element of the eastern end of the Trinity School building is four storey, with the remainder of the Trinity building being a mixture of single, two and three storey, and the Grammar Annexe building being three storey. It should also be noted that the applicant has carefully considered the levels across the site, as discussed in paragraph 63 above. The three and four storey elements are set at the lowest points of site (excluding the playing field), making use of lower ground floor stepped into the building design, giving an impression of a much lower building when viewed from Seal Hollow Road. With regard to overdevelopment of the site, I think that this matter has been addressed in the Green Belt discussion above, in that the total footprint of buildings across the site has reduced, and that the applicant has carefully rationalised space to create fit for purpose buildings at a scale and massing appropriate for the site and its surroundings.
73. The County Council's Conservation Architect was consulted on this application but no comments have been received to date. From my previous experience, this would lead me to believe that the Conservation Architect is not concerned about the impact of the proposal on the adjacent Conservation Area. Nevertheless, it is important to consider and address this matter. Wildernesse Conservation Area is characterised by large residential properties in large open plots with substantial mature natural landscaping. The boundary of the Conservation Area, as can be seen on the site location plan on page 2 of this report, adjoins the application site boundary to the south, to the west of the boundary of the site with 'Greensleeves'. As can be seen on the plan on page 2, there are no buildings within the Conservation Area to the direct south of the existing buildings on site. However, the District Council has recently granted planning permission for two properties to be built on the empty parcel of land to the west of 'Greensleeves'. The replacement buildings on site, would not, in my view impact upon these properties or the Conservation Area. Trinity Free School is proposed to the south west of the application site, with only a very limited element of the eastern end of the building being in line with the Conservation Area boundary. The Grammar Annexe, which is proposed to the north west of the Trinity building, would lie to the north of the Conservation Area boundary, but would be over 60 metres from that boundary at the closest point.
74. The boundary of the application site is well screened, especially to the south and east, with Summerhouse Wood occupying the eastern corner of the application site. In addition, the Conservation Area itself is characterised by mature landscaping and tree planting. Paragraph 132 of the NPPF states that 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation'. Although some views of the school building may be afforded from vantage points within the Conservation Area, I do not consider that the proposals would have a negative effect on the character and/or appearance of the Conservation Area, in considering the established educational use of the site, the poor quality of existing buildings, the degree of separation and the significant amount of screening. I therefore see no reason to refuse the application on this ground.
75. I do not have concerns over the general design as proposed, which is appropriate for the innovative uses of the internal space and the range of activities proposed. The two schools would read as one development but with clear individual characteristics giving

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each building a sense of identity. The applicant has provided indicative details of external materials, as listed in paragraph 20. However, in my view, it would be appropriate to seek further and final details of all materials to be used externally pursuant to condition, should permission be granted.

76. In my view, the two school buildings would respect the character of the site, and would not detract from the overall quality of the surrounding area. The development is therefore, in my view, in accordance with the principles of Development Plan Policy and respects the character and appearance of the surrounding development in terms of scale, massing, design and appearance. Subject to the imposition of conditions regarding the submission of final details of external materials, I do not consider that the design, massing, or scale of the building would have a significantly detrimental impact upon the appearance or amenity of the locality and, therefore, would be acceptable.

Access and highway matters

77. As can be seen from the representations summarised in paragraph 36 of this report and the consultation responses summarised in paragraph 33, specifically the views of Sevenoaks Town Council and The Wildernesse Residents Association, this application has met with significant objection on the grounds of access and highway matters. It is considered by those that have raised objection that the local highway network, including the Seal Hollow Road/A25 junction, could not safely accommodate the traffic associated with the school, that insufficient on-site parking is proposed, that pedestrian and cycle access has not been adequately considered, and that the development as a whole would have a unacceptable impact on the highway network, exacerbating existing congestion, air pollution and safety issues.

78. Before considering and discussing the points of objection raised, it is important to refer back to paragraphs 23-26 of this report, which summarise the access and parking arrangements proposed. This application is seeking approval for two schools on the former Knole (east) Academy site, an established school site which previously accommodated a 6 form of entry (FE) Secondary School with sixth form (1260 pupils). The Grammar Annexe proposed would also be 6 FE, accommodating the same number of pupils as the previous school on the application site did. However, the Trinity Free School would add a further 4 FE to the site, with an additional 790 pupils. In total, it is proposed that the site would accommodate 2,270 staff and pupils, with the break down as follows;

- Grammar Annexe - 1260 pupils
- 120 full time equivalent (FTE) staff
- Trinity Free School - 790 pupils
- 100 FTE staff

79. In considering this proposal and its impact on the highway network, it is important to note the established 6 FE use of the site. In real terms, therefore, it is the implications of the additional 4 FE that must be considered and addressed in detail. Kent County Council Highway's and Transportation advisor has made detailed comments on this application (see Appendix 1) following their thorough assessment of the submitted planning application documentation. It is the view of Highway's and Transportation that a key part of the mitigation for the traffic impact of the proposal is the staggered schools hours (see paragraph 22), which in principle would reduce the traffic impacts to those associated with a 6 FE school (established at this site), and a smaller school with earlier arrival and departure times. In light of the mitigation proposed (to be discussed in detail in the following paragraphs), Highway's and Transportation do not consider that there are sufficiently justifiable grounds to raise any objection to the proposals, subject to the

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imposition of planning conditions. The following paragraphs of this report will discuss the points of objection raised, consider the implications of the proposed development including mitigation proposed by the applicant and the conditions required by Highways and Transportation, and detail the considerations and final view of the Planning Authority with regard to whether or not the proposal is acceptable and sustainable in highway terms.

Impact on the local highway network including the Seal Hollow Road/A25 Junction

80. Local residents, the Wildernesse Residents Association and Sevenoaks Town Council all express concern over the ability of the local highway network to accommodate the additional traffic associated with the proposals. As listed in more detail in the summary of representations in paragraph 36, it is considered that the proposals would generate in excess of 2000 extra traffic movements on roads that they consider to be over capacity, including the Bat and Bull junction, and the A25/Seal Hollow Road Junction.
81. First, as stated in paragraph 79 above, the site has an established educational use and, until recently, accommodated a 6 FE Secondary School. The additional 4 FE proposed as part of this application would generate an additional 790 pupils over and above the 1260 pupils a 6 FE school would accommodate. It is not, therefore, correct to state that the proposals would generate over 2000 new traffic movements each day, as the site has previously operated with 1260 pupils on site, all using the existing highway network and the existing access and parking facilities on site. In terms of highway considerations therefore, the applicant needs to address the impact and mitigation arising from the proposed additional 4 FE development on site. However, the wider points of objection raised must be considered and addressed in detail.
82. Local representations suggest that the application sites access arrangements are not acceptable, and that an alternative access should be provided to the site from the A25 and/or the traffic signalled A25/Seal Hollow Road junction should be removed and replaced with a roundabout. First, with regard to creating an access to the school site from Seal Hollow Road, specifically to the north eastern corner of the site (towards Seal), Highway's and Transportation advise that the alignment of the A25 here and the extensive vegetation would result in poor visibility at any site exit so such a proposal would be considered unsafe and impractical. In my opinion, the provision of an access here, and the associated car parking/circulation space, would also meet with objection from Sport England as such a facility would result in a loss of playing fields. In addition, the eastern half of the application site is free of buildings and hardstanding which, given the site's Green Belt location, is something that should be maintained. I therefore conclude that the provision of an access and its associated car parking/circulation routes direct from the A25 in the north east of the site would not be acceptable on highway safety, loss of playing field and Green Belt grounds.
83. Several residents have suggested that a small amount of land in the northwest corner of the site be used to enable the construction of a roundabout. Such a roundabout would replace the existing signalised A25/Seal Hollow Road junction, and would also have direct access into the school site from it. This suggestion has been put to Highway's and Transportation, who consider that such a scheme would not significantly change the number of conflicting traffic movements at the junction, and could indeed add to it by combining the school entrance to the junction. Highway's and Transportation also advise that such a scheme would have a considerable expense, disproportionate to the net increase in pupil numbers proposed. Moreover, as will be discussed in the following paragraphs, Highways and Transportation are of the opinion that the mitigation proposed by the applicant is sufficient to address the highway impacts of the proposals.

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I am also of the opinion that such a major highway alteration would be disproportionate to the development proposed, and therefore, the existing highway and access arrangements should be considered and assessed in terms of their suitability to accommodate the traffic movements associated with the proposals.

84. Having accepted that changing the access arrangements to the site and radically changing the signalised junction to a roundabout are not appropriate or feasible options, it is important to consider how the proposals would impact upon the existing highway network. The submitted Transport Assessment, including the supplementary document, has assessed the impact of the proposals on the local highway network, including junctions, in significant detail. Junction modelling and capacity assessments were carried out for the A25/Seal Hollow Road signalised junction for the current year and 2018, both with and without the fully occupied schools. It should be noted that this modelling did not consider the established and permitted 6 FE use of the site and predicted impacts are, therefore, higher than would typically be the case. In addition, the modelling refers to AM peak periods only as PM traffic associated with the school would peak approximately an hour before the main highway network peak. PM modelling was not, considered necessary and/or undertaken. The Junction Modelling concludes that the A25/Seal Hollow Road junction in 2018 without the development would be operating with limited capacity. With the development, the junction would be operating over capacity at AM peak periods. In real terms, the Transport Assessment considers that the 'with development' scenario would increase queue lengths by 18, 11 and 7 car respectively on the A25 east, A25 west and Seal Hollow Road approaches respectively.
85. It is accepted by Highways and Transportation that the development would result in the A25/Seal Hollow Road junction being over capacity at AM peak periods. However, the figures provided above do not take into account the established 6 FE use of the site. Should that have been considered, the junction would still be over capacity but the predicated additional queue lengths would be reduced by 60%. In addition, the applicant is proposing to introduce MOVA (Microprocessor Optimised Vehicle Actuation) to the signals to increase the effective capacity of the junction. It is estimated that this would reduce delays by 10%. Highways and Transportation have assessed the information provided, and considered the impact of the additional 4 FE on the operation of the junction. It is concluded that the impact would not be severe and, therefore, an objection regarding junction capacity would not be appropriate or justified in this instance.
86. In addition to the introduction of MOVA, further mitigation measures are proposed by the applicant, including staggering the school start and end times. It has been suggested within the submitted representations that the staggered school hours would not mitigate the impact of the proposals. As outlined in paragraph 22 of this report, the school hours for both the Trinity School and the Grammar Annexe are yet to be confirmed, although they are expected to be generally 07.30 to 17.00, which would include a staggered start and finish time of both schools (30 minutes apart). This staggering in school hours is considered by Highways and Transportation to be a key part of the mitigation proposed by the applicant and, should permission be granted, a condition of consent would ensure that the core start and end times of the two schools would be offset by 30 minutes. Highway's and Transportation consider such an approach to be workable and effective, and point out the Dartford Grammar School and Dartford Grammar School for Girls (located on opposite sides of an A-classified road) maintain staggered departure times which effectively reduces congestion around the schools, which have over 2,300 pupils in total. In my view, although singularly not sufficient to mitigate the impact of the proposals in their entirety, the staggered start and end times would effectively reduce the traffic peak by spreading traffic movements out over a longer period.

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87. Further additional matters regarding the wider highway network have been raised by third parties and also need to be considered and addressed. First, local residents state that Seal Hollow Road is narrow in places, meaning that if two large vehicles need to pass traffic comes to a standstill. It is further suggested that the road is, therefore, unacceptable for use by large school buses. However, the applicant and Highway's and Transportation have confirmed that school buses would use the existing bus routes which avoid the narrow southern section of Seal Hollow Road. I am therefore satisfied that the Seal Hollow Road would be able to safely accommodate buses associated with the school.
88. Representations also express concern regarding additional congestion on Seal Hollow Road, the A25, the Bat and Bull junction, and other local roads. The proposals would create traffic congestion, as all Secondary Schools do. However, it is accepted that the introduction of MOVA and the staggered school start and end times, would effectively mitigate the impacts of the proposal in terms of congestion and junction capacity (including the Bat and Bull junction). In addition, the on-site facilities, to be discussed below, have been carefully designed to draw traffic into the site to prevent queuing onto Seal Hollow Road, and a substantial pick-up/drop-off facility is proposed. It should also be noted that the net impacts of the proposal would be during the morning weekday AM peaks for a maximum of 39 weeks of the year. In light of the mitigation proposed, and in considering that the site has an established 6 FE use, I do not consider that the addition of 4 FE on the site would create a significant amount of congestion on local roads. I would not recommend refusal of the application on this ground.
89. With regard to air quality, the Bat and Ball Junction is an air quality 'black spot' and representations submitted suggest that this application would add to local air pollution along the A25, including the Bat and Ball Junction (a kilometre away from the application site). First, it is important to note that the majority of pupils who would attend the Trinity Free School and the Grammar Annexe would be attending schools outside of the District should this development not be granted permission. Those pupils would already be on the local highway network, albeit travelling a greater distance to school. Therefore, cumulatively, it could be argued that reducing journey times, and providing a local school for the Sevenoaks south area enabling a greater number of pupils to walk and cycle to school, would have a positive impact on air pollution levels. However, it could not be argued that the proposal would improve air quality at the Bat & Bull Junction or along the A25 in general, but I would suggest that the movements associated with a 4 FE increase above the 6 FE established use of the site would not materially change air pollution levels. I therefore see no reason to refuse the application on this ground.

Site Access/Car Parking/Pick-up and Drop-off

90. Further mitigation proposed by the applicant is the provision of onsite car parking, bus parking, and a significant amount of pupil pick-up/drop-off, carefully designed to draw vehicles into the site, off of Seal Hollow Road. As detailed in paragraphs 23 to 27 of this report, the three existing vehicular site accesses are to be retained, an additional vehicular access provided, and a new pedestrian access provided, to link with the pedestrian boulevard on site. This application proposes to provide a total of 242 car parking spaces, split into a larger car park to the north accessed via the existing 'entrance' (widened) and 'exit, and a smaller car park to the south, accessed via the new vehicular access point (in and out). The existing southern access would be retained for service access and deliveries only. The pedestrian boulevard would separate these two car parking areas.

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91. The smaller car park to the south would provide 25 car parking spaces for Trinity School staff, and would not be used by visitors or parents of pupils at either of the schools. The northern car park would be the main access point for both schools, and would include a 148 metre parent drop-off zone, 217 parking bays (including 24 parent parking spaces and 11 accessible bays), 13 motorcycle bays, and a coach parking/drop off area which has capacity for 8 buses and parking for 7 mini buses. It has been suggested in representations that pick-up and drop-off has not been considered, and that insufficient car parking is proposed. However, the car parking figures proposed accord with Kent County Council's maximum parking standards for Secondary Schools, and I am more than satisfied that this is acceptable.
92. A substantial amount of pick-up/drop-off is proposed, designed to ensure that vehicles are drawn into the site to prevent congestion around the site entrance/exit points. In addition, as requested by Highways and Transportation and the County Council's School Travel Plan Advisor, should permission be granted, a condition of consent would require the submission and approval of an 'On Site Traffic Management Strategy'. That Strategy would detail how traffic would be managed on site, including the provision of staff to direct traffic at peak school times to ensure that the 148 metre drop off zone would work effectively. In addition, although not required by Highways and Transportation, they further recommend that the minor changes are made to the parking layout at the site entrance to effectively block the northern end of the first rows of car parking, giving vehicles no choice but to take the longer route around the site, further drawing them away from Seal Hollow Road. Highways and Transportation consider that the proposal is acceptable without such a change, but I consider that this would further mitigate potential congestion around the site entrance and exit points. Due to the minor nature of the changes, I consider that a revised plan should be submitted for approval pursuant to planning condition, should permission be granted, showing how the northern end of the first rows of car parking would be blocked to prevent vehicular access. Subject to these conditions, I consider the onsite car parking and pick-up/drop-off facilities to be acceptable to meet the demands of the proposals.
93. With regard to the site accesses, Highway and Transportation require the new access onto Seal Hollow Road to be provided with visibility splays measuring 2.4 metres x 50 metres, or other dimensions if agreed in writing by the County Planning Authority, and that the visibility splays be maintained at all times free from obstructions higher than 1 metre above the carriageway. The applicant has confirmed that these visibility splays could be provided and, should permission be granted, a condition of consent would be imposed to accord with the wording above. In addition, it is suggested in a third party representation that the existing southern site access is dangerous. However, this is an existing access point and would be retained for service access and deliveries only. Highways and Transportation have visited the site and conclude that that access is adequate for the intended purpose. I therefore consider that site access arrangements to be acceptable.
94. Local representations consider that controlled parking zones should be introduced in local roads to prevent parents picking-up/dropping off there. It is likely that some parents will drop-off and collect their children from surrounding roads, as happens at all schools. Highways and Transportation also point out that this would have been the case with the previous school on the site, and would be the case should those existing buildings be reused for an education purpose. However, it is the view of Highways and Transportation that the proposed drop-off/pick-up facility on site and the staggered school start and end times, in conjunction with bus use and pedestrian and cycle access, would provide a good basis for keeping any traffic impact close to the levels

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experienced when the established 6 FE school on site was in use. I therefore see no basis for requiring the introduction of controlled parking zones at this time.

95. In addition to the above, should permission be granted, School Travel Plans for both schools should be submitted and approved prior to opening. This accords with the requirements of Highways and Transportation and the County Council's School Travel Planner. However, before the school's open, limited information would be available to enable an effective and robust Travel Plan to be prepared. I would therefore consider it appropriate that a review of the initial Travel Plan(s) be submitted within 6 months of the date of occupation of each school, and thereafter be subject to ongoing monitoring and review. The Travel Plan(s) would encourage and promote more sustainable methods of transport to the school, which would further mitigate congestion on the local highway network.

Pedestrian Access

96. The adequacy and safety of pedestrian access to the site has been raised within a number of third party representations, and in the consultation response from Sevenoaks Town Council. A lack of crossing facilities is raised, in addition to a lack of adequate pavements and previous records of pedestrian injuries. The applicant estimates that the number of pupils crossing Seal Hollow Road would be 430 in the morning and 492 in the afternoon. However, Highways and Transportation consider that this figure could be slightly more as some parents may choose to drop pupils off in local roads.
97. The applicant is proposing to provide a new pedestrian crossing on Seal Hollow Road controlled by a school crossing patrol officer, to align with the new pedestrian site entrance and the access boulevard. In addition, 'school ahead' warning signs with wig-wag flashing signs are proposed on both the A25 and Seal Hollow Road School approaches. The Public Right of Way Network/footway network is not proposed to be improved, and the County Council's Public Rights of Way Officer has raised no objection to the application. Highways and Transportation consider the existing footpath network to be acceptable, and do not require any improvements to be made. However, the applicant does accept that there are some deficiencies in the footway network around the school, with footways further south along Seal Hollow Road swapping sides, with no dedicated drop kerb crossings. However, the applicant considers that the amount of pupils expected to travel from that direction would be minimal, and that safe crossing of the carriageway is possible. Routes used by pupils to walk to the site would be monitored as part of the Travel Plan process, and future improvements could be secured as part of the Travel Plan review process should they be deemed necessary.
98. With regard to the lack of local crossing facilities and the number of accidents involving pupils crossing local roads in recent years, Highways and Transportation consider the proposed pedestrian crossing on Seal Hollow Road to be a safe and acceptable crossing facility in highway terms. Highways and Transportation state that personal-injury crash record data shows that over the last 10 years there was one personal-injury crash on Seal Hollow Road involving a child pedestrian, and no records of accidents involving pedestrians on the A25. Highways and Transportation in their consultation response (see Appendix 1) do state that, with regard to the pedestrian crossing on Seal Hollow Road, it should be noted that at some times of the day there would be no crossing patrol, and that at some times of the day the volume of traffic may make it difficult for the crossing patrol to operate. In addition, Highways and Transportation refer to an existing traffic island, located to the west of the A25/Seal Hollow Road junction, which is currently only 1.47 metres wide. It is considered that that island would be likely to see increased pedestrian flows should this application be permitted.

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99. As can be seen in the Highways and Transportation consultation response, no objection is raised to the development as proposed. A number of 'other recommendations' are made by Highways and Transportation although the development is considered to be acceptable without them. The Highways and Transportations 'other recommendations' suggest that the western pedestrian island at the junction with the A25/Seal Hollow Road (referred to above) should be widened to 1.8 metres, and that the crossing to be provided on Seal Hollow Road should be upgraded to a signalised crossing. In considering the information in paragraph 98 above, I am of the view that the pedestrian island should be widened and a signalised crossing provided as part of this scheme, and would be justified in this instance. The applicant have agreed to provide both of these pedestrian access improvements, and I can consider that their provision can only encourage further pupils to walk to school, and enable safe crossing of both the A25 and Seal Hollow Road. Therefore, should permission be granted, I consider that conditions of consent should be imposed requiring further/final details of the widening of the pedestrian island, and the provision of a signalised crossing, and a timeframe for implementation of the works. Given that the school has an established 6 FE use, I would consider it reasonable that the timeframe for implementation be linked to the amount of pupils of site. When the amount of pupils on site (both schools) reaches 1260, the facilities should be provided. However, such detail would be approved pursuant to the condition. Subject to the conditions outlined above, I am satisfied that the development would be acceptable in terms of safe pedestrian access.

Cycle Access

100. Local representations, specifically those from the Sevenoaks Cycle Forum, raise concerns regarding the provision of safe cycle access to the site. The Sevenoaks Cycle Forum are of the view that the submitted Transport Assessment(s) and Travel Plan made no reference to the Sevenoaks District Cycle Strategy, a document prepared by Kent County Council Highway's and Transportation, Sevenoaks District Council and the Cycle Form. The Sevenoaks District Cycle Strategy includes a proposed 'school-friendly' cycle route across the north of Sevenoaks, linking primary and secondary schools, which at its eastern end would terminate at the application site (Riverhead School marks the western end). The route follows residential streets and footpaths, providing an alternative to the A25. Sevenoaks Cycle Forum consider that the implementation of the route would play a vital part in meeting the goals of the Travel Plan for the former Wildernesse site and that without the implementation of the route, there is no safe route to the school by bike and cycling on many roads, including the A25 is hazardous. The applicant has considered the points raised by the Cycle Forum and included reference to the Cycle Route within the supplementary Transport Assessment. However, the applicant was of the view that the route, which links St Johns Hill to the application site via Wickenden Road, Littlewood, Hillingdon Avenue and The Crescent, is already available for use by cycles, although not specifically signed as a cycle route. Highway's and Transportation consider that that section of the route should be sign posted to encourage use of the route, and request that a condition of consent be imposed to require the provision of cycle signage to the school. Details of the location of the signage and a timeframe for installation would be required as part of the condition. The applicant has subsequently agreed to provide the required signage, and I am of the opinion that this should be provided to further encourage sustainable transport by the provision of a safe clearly signed route. Therefore, should permission be granted, I consider that the provision of cycle route signage should be secured by way of a planning condition, with details of location, type of signage, and a timeframe for implementation to be submitted for approval.

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101. Within the application site, the applicant is proposing to provide 90 cycle stands (180 cycle parking provision) adjacent to the main entrance of the Grammar Annexe and a further 50 cycle stands (100 cycle parking provision) adjacent to the Trinity School. Safe cycle routes would also be provided within the site, joining the site entrances with the cycle parking facilities. However, Highway's and Transportation consider that further details of the cycle routes within the site and the cycle parking facilities should be submitted for consideration and further approval. Therefore, should permission be granted, a further condition of consent would require the submission of further details with regard to the on-site cycle access and parking facilities. Subject to that, and the cycle route signage condition discussed above, I consider that the proposal would be acceptable in terms of the provision of safe cycle access.

Summary – Access and Highway Considerations

102. In my view, the introduction of MOVA at the A25/Seal Hollow Road junction, the staggered school start and end times, the on-site pick-up/drop-off arrangements and improvements to car and bus access, parking and manoeuvring areas, collectively effectively mitigate the impact of the proposals on the highway network, especially in considering the established 6 FE use of the site. In addition, the improvements required to pedestrian and cycle access, including the provision of a signalised crossing and cycle route signage, would, in conjunction with the required School Travel Plan, encourage the use of more sustainable modes of transport. Subject to the imposition of conditions, as discussed in paragraphs 80 - 101, I do not consider that the proposed development would have a significantly detrimental impact on the highway network and therefore see no reason to refuse the application on this ground.

Landscaping

103. As outlined in paragraph 27 of this report, an Arboricultural Assessment/Survey has been submitted in support of this application. The proposed development layout (as amended) would ensure that all Grade A trees would be retained. The woodland habitat to the east of the site would also be unaffected by the proposals as would the majority of trees to the site boundaries. I am advised that a total of 60 trees would be removed to accommodate the proposals (including some small groups), but that the applicant intends to replace these trees and provide additional planting as part of a detailed landscaping scheme. Whilst 60 trees might sound excessive, this is an extensive development site in a sylvan setting, comprising mature woodland and a large number of trees that would be otherwise unaffected by these proposals. The applicant intends that all trees to be retained within works areas would be protected during construction to BS5837:2012 'Trees in relation to design, demolition and construction'.

104. Tree planting and landscaping are important features and characteristics of the site, and also play a significant role in screening the development and ensuring it sits well within the locality and wider landscape. The County Council's Landscape Advisor has been consulted on this application, including the revised documentation, and has no objection given the amendments made to retain the Grade A trees, subject to conditions to ensure that retained and newly planted trees would be sufficiently protected. It is requested that a detailed Arboricultural Method Statement (AMS) be submitted for approval prior to commencement of the development to explain how the demolition would be carried out with regard to the retained trees. In addition, a scaled Tree Protection Plan (TPP) is required, again to be submitted and approved by the County Planning Authority prior to the commencement of the development. Should permission be granted, I consider it appropriate that these conditions be imposed to ensure retention and ongoing protection of trees across the site, including a number of Grade A trees and a veteran oak.

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105. However, I am also of the view that a detailed final landscaping scheme should be submitted for approval pursuant to condition, should permission be granted, to ensure that sufficient replacement trees are provided, and additional screening and planting proposed where necessary and appropriate. Again, should permission be granted, this matter would be covered by a relevant planning condition.

Ecology

106. As outlined in paragraph 28 of this report, the submitted 'extended Phase 1 habitat survey' identified suitable habitats on site for nesting birds and a potential reptile habitat on the southern boundary. The woodland to the east of the site (unaffected by the proposals) was identified as suitable habitat for dormice and badgers. As a result of the above, the applicant submitted further supporting information in the form of a 'Method Statement for Works to Avoid Impacts on Wildlife', an 'Outline Ecological and Management Enhancement Plan', and a document titled 'Pre-Planning Ecological Issues'.

107. The County Council's Biodiversity Officer has assessed this additional supporting information and is satisfied that the proposed development would not have an adverse impact on protected species, subject to the imposition of conditions. First, the development must be carried out in strict accordance with the conclusions and recommendations of the submitted surveys. With regard to reptiles, a precautionary mitigation approach is considered appropriate to enable clearing of the southern site boundary but, should permission be granted, a detailed mitigation strategy should be submitted pursuant to condition for further comments. Lastly, one of the principles of the National Planning Policy Framework is that "*opportunities to incorporate biodiversity in and around developments should be encouraged*". The County Council's Biodiversity Officer considers that a detailed Landscape and Ecological Management Plan (LEMPs), should be produced for the whole site as a condition of planning permission. The wording of the required condition is set out in section 33 of this report, and I consider that that condition should be imposed should permission be granted. Subject to the imposition of the condition outlined above, I am satisfied that the development would not have a detrimental impact upon protected species and/or their habitats.

External lighting

108. No details have been provided regarding external lighting for the development. If permission is granted it would, therefore, be appropriate to reserve details by condition so that the type and position of any external lighting, including lighting of the buildings for security and wayfinding, and lighting of the car parking and access areas, can be controlled to ensure any potential nuisance from light pollution can be minimised. The lighting details must adhere to the Bat Conservation Trusts 'Bats and Lighting in the UK' guidance. It should also be noted that there is an existing outdoor floodlit sports facility on this site, unaffected by these current proposals.

Sports Facilities/Community Use

109. It is suggested within a representation that the site has inadequate sports facilities to support two schools. However, as outlined in paragraph 21 of this report, the site would accommodate (retained and proposed facilities) the existing floodlit Multi Use Games Area (MUGA), the Wildernesse Sports Centre, a 4-court Sports Hall attached to Trinity School, two tennis court sized MUGAs which would accommodate 1 netball/basketball court or 2 tennis courts each, and grass playing pitches providing a rugby and football

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pitch, and 400 metre running track. Sport England has been consulted on this application and has not raised objection to the proposals on the basis that there is a net gain in sports facilities and sufficient to accommodate the needs of the two schools.

110. Sport England's no objection is, however, subject to the imposition of two conditions of consent. First, Sport England requires the imposition of a condition requiring the submission and approval of a Community Use Agreement prior to the first use/occupation of the development. Some existing facilities on site, such as the floodlit MUGA and Wildernesse Sports Centre are already used by the wider community, and it is the applicant's intention to maintain this community use. Furthermore, the applicant intends to open up further facilities on site to controlled community use such as the library, performance and dining spaces and the 4 court sports hall. The existing Wildernesse Sports Centre is available for use until 22.45 Monday to Friday, 22.15 on Saturdays and 22.15 on Sundays. This is expected to remain unchanged. However, I consider it appropriate that further details of community use be submitted for approval, and therefore I am of the opinion that a Community Use Scheme, as required by Sport England, should be submitted for approval prior to occupation/first use of the development.

111. The second condition required by Sport England requires the completion of the replacement tennis courts, new sports hall, activity studio and changing rooms prior to the first use of the development. These facilities, in the view of Sport England, must be fully operational and available for use. However, the applicant is of the opinion that the development could be constructed in phases, and that an element of the new build school facilities could be operational and in use prior to completion of other elements of the scheme, which could include some of the sports facilities. The details of the phasing are unknown at this stage, and the applicant has therefore requested that some flexibility be included within the required condition to add a caveat of 'unless otherwise approved in writing by the County Planning Authority, in consultation with Sport England'. This would enable the applicant to submit a programme of works and a phasing of the provision of the sports facilities should it become apparent that the specified facilities would not all be completed and operational prior to first occupation of the development. Sport England have agreed to the amended wording of the condition, which would be imposed should permission be granted.

Flood Risk Assessment, Drainage and Contaminated Land

112. In accordance with the principles of Development Plan Policy the applicant has submitted a Flood Risk Assessment (FRA) with this application, which has not met with objection from the Environment Agency, nor have they questioned its content. However, representations from the local community suggest that part of the site is within the flood risk zone, and that any development would exacerbate an 'already sensitive flooding position', and exacerbate surface water flooding on Seal Hollow Road and along the A25. First, it is important to note that the building footprint on site would actually be reduced as a result of this development, that the new built development would have a drainage system conforming to modern exacting standards, and that any proposed hard surfaced car parking, amenity of sports spaces would be properly drained and managed.

113. The submitted FRA states that the majority of the site is located within Flood Zone 1, which means that most of the site has a low (less than 0.1%) annual probability of flooding from rivers or the sea. All of the existing and proposed development on site is within Flood Zone 1 (i.e. the lowest category of flood risk). However, a valley feature within the site (and beyond) is identified as being within a Flood Zone 2. This valley

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feature runs across the lowest level on site, from north to south across the eastern playing fields. The valley continues through existing housing development to the north and south (when viewed on the Environment Agency website). In the preparation of the FRA, no watercourse was observed, and there are no specific records of flooding in this location.

114. The Environment Agency raises no objection to this application subject to the impositions of conditions. The Environment Agency is satisfied with the content of the FRA, and states that should permission be granted, a condition of consent should require the development to be carried out in accordance with the approved FRA. A further condition of consent would require the submission and approval of a detailed surface water drainage scheme. The two conditions outlined above would ensure that drainage at the site was acceptable, and that the development would not lead to an increased risk of flooding. The Environment Agency also requires the submission of various components of a scheme to deal with the risks associated with contamination of the site and the submission of a verification report demonstrating completion of the remediation strategy. Therefore, should permission be granted, conditions would be imposed covering the matters raised above. That would ensure that the development would not result in an unacceptable level of pollution or increase the risk of flooding, in accordance with the principles of Development Plan Policy. In addition, the Environment Agency's advice and guidance regarding waste on site, waste to be taken off site, and storage of fuels and chemicals should be covered by way of an informative.

Secured by Design

115. The applicant advises that the principles of Secured by Design, as they apply to schools, have informed the design process, as outlined in paragraph 30 of this report. The proposed development would provide enhanced security to the site as a whole, including the new school buildings. Some of these matters, such as on-site fencing and security lighting, would need careful consideration to ensure they were applied in a balanced way so that, for example, the visual appearance of the site was not compromised by inappropriate security lighting. However, they would otherwise accord with Development Plan Policy in respect of providing a safe and secure environment. If planning permission is granted these matters would be dealt with in the drawing up of the detailed design drawings and, in part, by planning condition i.e. details of lighting and on-site fencing. However, although raising no objection to this application, Kent Police's Crime Prevention Design Advisor requests that should planning permission be granted, a condition of consent be imposed to require the submission and approval of details of 'measures to minimise the risk of crime', to accord with the principles and physical requirements of Crime Prevention Through Environmental Design. The approved measures should thereafter be implemented before the development is occupied and thereafter retained. Although indicative details have been provided, and lighting and fencing would be controlled by separate planning conditions, the applicant has accepted the imposition of the required condition to ensure that Secure by Design principles are met. Therefore, should permission be granted, a condition of consent to accord with that outlined above would be imposed.

Archaeology

116. The County Archaeologist has concluded that in order to secure the appropriate level of evaluation and mitigation of archaeological potential at the site, a condition of consent should be imposed. It is requested that no development takes place until the applicant has secured the implementation of a programme of archaeological work in accordance with a written specification and timetable. I consider that the suggested condition would

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be an appropriate requirement in ensuring an acceptable level of evaluation and mitigation of the archaeological potential of the site. Therefore, subject to the imposition of the required condition, I do not consider that this proposal would have a detrimental impact on archaeological remains.

Sustainable construction

117.The applicant advises that the project would achieve a minimum 'Very Good' rating under BREEAM for schools. As outlined in paragraph 31 of this report, the buildings would include a number of sustainable features and I consider that the applicant has given sufficient information within the planning application to demonstrate how the rating of 'Very Good' would be achieved. I therefore consider it sufficient and acceptable to condition that the development achieve at least a 'Very Good' rating, but not to request the submission of further details in relation to this. In particular, the developers are already tasked with meeting the exacting design standards demanded of them by the Department for Education funding process and any planning controls in this regard could be duplicating, and potentially conflicting with, such requirements.

Construction

118.Given that there are nearby residential properties, if planning permission is granted it would, in my view, be appropriate to impose a condition restricting hours of construction and demolition in order to protect residential amenity. I would suggest that works should be undertaken only between the hours of 0800 and 1800 Monday to Friday and between the hours of 0900 and 1300 on Saturdays, with no operations on Sundays and Bank Holidays.

119.Local residents have expressed concern that Seal Hollow Road is not sufficient to accommodate construction traffic, and that the development could be under construction at the same time as a potential major development at the nearby Wildernesse House (formerly Dorton House). In addition, the residents of 'Greensleeves' have requested that screening should be provided along the southern site boundary during construction. First, with regard to the suitability of Seal Hollow Road, Kent County Council Highways and Transportation have been specifically asked to comment on this matter, and consider the road and associated access arrangements to be acceptable. In addition, it should be noted that Seal Hollow Road has provided access to construction vehicles associated with previous developments at the school site and that this has been managed in conjunction with an operating school. In this instance, the school site is vacant, so construction traffic would not conflict with school traffic. With regard to possible conflicts with potential construction traffic associated with Wildernesse House, this is not relevant to the determination of this application. However, Kent County Council Highways and Transportation confirm that construction traffic associated with the proposal before us would be required to comply with a 'Construction Traffic Management Plan' or similar. The same would apply to the Wildernesse House development, should it go ahead.

120.In light of the above, and in accordance with the recommendation of Kent County Council Highways & Transportation, I consider it appropriate that details of a Construction Management Strategy be submitted for approval prior to the commencement of development. Such a document would incorporate all of the requirements of a 'Construction Traffic Management Plan', but go beyond this to include details of the methods and hours of working, location of site compounds and operative/visitors parking, details of site security and safety measures, lorry waiting and wheel washing facilities, and details of any construction accesses. In considering the

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representation from 'Greensleeves' which requested that screening be provided along the southern site boundary during construction works, I also consider that it would be appropriate to require details of site hoardings/screening within the Construction Management Strategy. In my view, screening must be provided along the southern boundary during construction works, and I would expect this to be included within the submitted document. Therefore, should permission be granted, a Construction Management Strategy would be required pursuant to condition and the development would thereafter have to be undertaken in accordance with the approved strategy.

121. In addition to the above, should permission be granted, conditions of consent would ensure that dust, noise, mud on the local highway network, and other matters associated with construction, would be mitigated as far as reasonably possible so as to minimise disruption to local residents.

Other matters

122. The Governing Body of Knole Academy express concern that the County Council is determining a planning application submitted by the County Council. The power to determine planning applications such as this is governed by Regulation 3 of the Town and Country Planning General Regulations 1992. This requires the County Council to determine such planning applications as long as the development is to be carried out by (or on behalf of) the County Council or jointly with another named party. The development may be on land within the County Council's ownership, or any other land. The legislation in this case is very well established and clear. Further, it gives the County Council no discretion as to where the planning application should be submitted. This is the same planning process that is followed by every local authority wishing to carry out development in the circumstances described above. In an event, this application will be referred to the Secretary of State for Communities and Local Government for consideration should Members agree with the recommendation in paragraph 125 of this report. This latter point is also relevant in answering the second concern raised by Knole Academy below.

123. Knole Academy (and some local representations) suggest that the building of a Grammar Annexe, as proposed in this planning application, is in direct contravention of the Secretary of State for Education's decision. The background to this is summarised in paragraph 6 of this report. Members will be aware that this application must be considered and determined on its own merits, assessed against relevant planning law, policy and guidance. Whether or not the proposal could be implemented is a matter for the applicant and not the Planning Authority.

Conclusion

124. This proposal has given rise to a variety of issues, including the need for very special circumstances to justify inappropriate development in the Green Belt, the impact of the proposed development on the openness of the Green Belt, and the impact of the development on the highway network. I consider that very special circumstances have been demonstrated in this particular case for overriding Green Belt policy constraints. I also consider that the development has been designed to minimise the impact of the development on this part of the Green Belt, and its functioning. In addition, subject to the imposition of the conditions outlined throughout this report, I consider that the proposed development would not have a significantly detrimental impact on the local highway network, the amenity of local residents or the adjacent Conservation Area, and would accord with the principles of sustainable development as set out in the NPPF. In addition, support for the provision of school places is heavily embedded within the NPPF

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and local planning policy, and this development would satisfy a required need for secondary school places in the Sevenoaks South area. Therefore, subject to the imposition of conditions, I am of the opinion that the proposed development would not give rise to any material harm, is sustainable, and is otherwise in accordance with the general aims and objectives of the relevant Development Plan Policies and the guidance contained in the NPPF. Therefore, I recommend that the application be referred to the Secretary of State as a departure from the Development Plan on Green Belt grounds, and that subject to his decision, permission be granted subject to appropriate conditions

Recommendation

125.I RECOMMEND that the application BE REFERRED to the Secretary of State as a departure from the Development Plan on Green Belt grounds, and that subject to his decision that PLANNING PERMISSION BE GRANTED SUBJECT TO conditions, including conditions covering:

- the standard 5 year time limit for implementation;
- the development to be carried out in accordance with the permitted details;
- the submission and approval of details of all materials to be used externally;
- the submission and approval of details of all external lighting, including hours of operation;
- the submission and approval of a scheme of landscaping, including replacement tree planting, soft landscaping, hard surfacing, its implementation & maintenance;
- the submission and approval of details of all gates, fences and means of enclosure, including a fence to the southern site boundary adjoining 'Greensleeves' (to be agreed in consultation with the occupants of the 'Greensleeves'.)
- the submission and approval of an Arboricultural Method Statement (AMS) prior to commencement of the development to explain how the demolition would be carried out with regard to the retained trees;
- the submission and approval of a scaled Tree Protection Plan (TPP) prior to the commencement of the development.
- development to accord with the recommendations of the submitted ecological surveys/reports;
- the submission and approval of a detailed Landscape and Ecological Management Plan (LEMPs);
- the submission and approval of a detailed mitigation strategy with regard to reptiles and clearance of the southern site boundary;
- the submission and approval of a specification and timetable for a programme of archaeological works.;
- the submission and approval of details of 'measures to minimise the risk of crime';
- a BREEAM rating of 'Very Good' to be achieved;
- the submission and approval of a Community Use Scheme relating to use of the indoor and outdoor facilities, including hours of use;
- the provision of replacement tennis courts and proposed new sports hall, activity studio and changing rooms prior to occupation, unless otherwise agreed by the County Planning Authority;
- the submission and approval of details of cycle route signage, including location, type of signage, and a timeframe for implementation;
- the submission and approval of details of on-site cycle parking and access routes;
- staggered/offset school start and finish times;

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- the submission and approval of a Travel Plan for each school prior to occupation, and submission of a review within six months of occupation, and thereafter ongoing monitoring and review;
- the submission and approval of details of widening to the pedestrian island on the A25, including a time frame for implementation;
- the submission and approval of details of a signalised crossing on Seal Hollow Road, including a time frame for implementation;
- provision and retention of car parking, coach/bus parking/waiting, cycle parking, access, circulatory routes and turning areas;
- the provision of the required visibility splays at the new entrance;
- the submission and approval of an 'On Site Traffic Management Strategy';
- the submission and approval of a revised car parking layout.;
- the development to be carried out in strict accordance with the approved FRA;
- the submission and approval of further works with regards to contaminated land;
- the submission and approval of details of a surface water drainage scheme;
- hours of working during construction and demolition to be restricted to between 0800 and 1800 Monday to Friday and between the hours of 0900 and 1300 on Saturdays, with no operations on Sundays and Bank Holidays;
- the submission and approval of a construction management strategy, including access, lorry routing, parking and circulation within the site for contractor's and other vehicles related to construction, site hoarding/fencing details, and demolition operations, and the provision of site hoardings/screening (particularly with regard to 'Greensleeves'), specifically along the southern site boundary;
- measures to prevent mud and debris being taken onto the public highway.

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

- Account should be taken of the Environment Agency's advice regarding waste on site, waste to be taken off site, and storage of fuels and chemicals;
- The external lighting scheme must adhere to the Bat Conservation Trusts 'Bats and Lighting in the UK' guidance;

Case officer – Mary Green	01622 221066
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Background documents - See section heading
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Appendix 1



Kent County Council
Planning Applications Group
First Floor, Invicta House
County Hall
Maidstone
Kent
ME14 1XX

Highways and Transportation
Ashford Highway Depot
4 Javelin Way
Ashford
TN24 8AD
Tel: 03000 418181
Email: peter.slaughter@kent.gov.uk
Date: 29th April 2014

Application Reference - KCC/SE/0375/2013
Location - Knole (east) Academy, Seal Hollow Road, Sevenoaks, Kent, TN13 3SN
Proposal - Proposed redevelopment of the former Wildernesse School site: proposed demolition of existing school buildings retention and refurbishment of existing Sports Centre, erection of two new secondary schools (a 6 form of entry Sevenoaks Grammar Annexe and a 4 form of entry Trinity School), introduction of new vehicular and pedestrian accesses, rearranged car and extended car park to provide 242 car parking spaces and dedicated child drop off/collection and bus zones, relocation of existing tennis courts into two new Multi Use Games Areas and associated detailed landscape works

Mary,

KCC Highways & Transportation have considered the Transport Assessment (TA) and the Supplementary Transport Assessment Addendum and have the following comments.

Issues regarding Traffic and Parking:

1. Modelling shows the A25 / Seal Hollow Road over capacity and with significant queues. This includes average delays of 3.4 minutes for traffic from the south and 2.1 minutes on the A25 from the west.
2. The applicants propose that MOVA (Microprocessor Optimised Vehicle Actuation) could be added to the signals to increase effective capacity of the junction, and estimate that this could potentially reduce delays by 10%.
3. The applicants also propose that the traffic impact could be reduced by staggering the hours of the two schools.
4. To avoid school traffic in Seal Hollow Road and congestion in the school car park it is likely that some children will be unloaded from cars on the surrounding road network rather than in the school car park. Similarly some parents will park on nearby residential roads while waiting to collect their children in the afternoon. This is not possible to model accurately.
5. The Transport Assessment (Section 4.14) states that sixth-formers will not be permitted to park at the schools or in nearby roads. However, schools have no way of preventing

students from parking on the surrounding streets and this is likely to happen to some extent as at other schools.

6. No modelling or other congestion estimates have been provided for the afternoon period when pupils will be leaving school. This will be out of the main evening peak period, however it should be noted that some Sevenoaks commuters leave work at 16:00, so there is a significant surge of traffic levels around 16:10 at the A25 / Seal Hollow Road junction. This may coincide with late departures from the school, for example from after-school clubs.
7. Modelling suggests long queues in the school car park, however these will be to some extent reduced by pupils alighting from their cars on the surrounding highway. We recommend making minor changes to the school car park to ensure that there is no short route to drive through it, otherwise this will be the preferred route for drivers and at busy times a queue would form here which could extend out of the entrance and back onto Seal Hollow Road causing congestion there.

Issues regarding pedestrians:

1. The number of pupils estimated to be crossing Seal Hollow Road is stated to be about 430 (in the morning) and 492 (afternoon) if the travel plans are successful. However the number of people crossing and the associated traffic delays are likely to be more than this as parents will drop off pupils in the road rather than queue in congested car park.
2. Measured widths of the footway of Seal Hollow Road opposite the school are between 2.16 metres and 1.70 metres along most of its length, although it widens considerably adjacent the junction with The Crescent. The footway is already used by parents and children walking to and from primary school. It should be noted that CIHT's Guidelines for Providing for Journeys on Foot recommend a minimum footway width of 1.8 metres.
3. There is no formal pedestrian crossing on Seal Hollow Road, but a school crossing patrol is proposed. It is not stated if any formal site assessment has been undertaken regarding suitability of the location for the proposed patrol. It needs to be remembered that at some times of the day it is unlikely there would be a patrol, for example for pupils attending after-school classes. In addition, the volume of traffic may make it difficult for the crossing patrol to operate. A signal-controlled crossing would therefore be preferable.
- 5 The footway from the south (from Sevenoaks) crosses over Seal Hollow Road south of the site.
- 6 The existing traffic island on the west side of the A25 / Seal Hollow Road junction is only 1.47 metres wide. This is likely to see increased pedestrian flows if the proposed schools open, however it is already used by parents and small children walking in groups to and from school.

Issues regarding buses:

1. The layout of the bus stands within the site is quite constrained. Buses really require more room to manoeuvre relative to each other. There appears to be scope to improve the design to reduce congestion here.
2. Buses may be caught in queues of cars on surrounding roads, and probably also when exiting the site.

Cycling Issues:

- The TA assumes approximately 40 – 60 pupils will cycle to school, plus 11 staff. The Supplementary Transport Assessment Addendum acknowledges that few cyclists are likely to cycle on Seal Hollow Road due to the traffic levels. It is stated that "pupils are more likely to cycle on residential roads...with access into the school via the southern

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vehicular access". This is despite the TA stating that this access has poor visibility to the south, due to the visibility splay crossing private land.

- The TA makes no suggestions for highway improvements for cyclists, which could create a more cycle-friendly environment and encourage more pupils to cycle rather than travel by car.
- The Design and Access Statement proposes that a cycle route will run into the site alongside the new pedestrian boulevard, and that "it is intended that this cycle route will link to the existing cycle routes within the surrounding area".
- The Sevenoaks Cycling Strategy recommends signing The Crescent, Hillingdon Avenue, Littlewood, Wickenden Road and other streets as cycle routes in order to create a cycle route to the school site from the west.

Other observations:

1. The District Council's consultation response highlights the lack of footway on the east side of Seal Hollow Road in the vicinity of the school. We have not requested such a footway to be provided as it would lead to vehicles stopping to unload pupils and causing congestion. There would be potential for collisions as the location is after turning the corner from the A25 and there is limited visibility.

Recommendation:

A key part of the mitigation for the traffic impact of the proposal is the staggered school hours. In principle this reduces the traffic impacts to those of the already-permitted school and a smaller school with earlier arrival and departure times. After consideration of all the above issues and the proposed mitigation measures we do not consider there are sufficiently justifiable grounds to raise any objection to the proposals subject to the planning conditions set out below.

1. Applicants to provide an On Site Traffic Management Strategy detailing for example provision of staff to direct traffic at the school entrance.
2. Details to be provided of cycle parking and access routes for cycles within the site.
3. Provision of cycle route signage to the school, for which plans to be agreed in writing with KCC Highways & Transportation;
4. All new accesses onto Seal Hollow Road to be provided with visibility splays measuring 2.4 metres x 50 metres, or other dimensions if agreed in writing with KCC Highways & Transportation, and these visibility splays to be maintained at all times free from obstructions higher than 1 metre above the carriageway surface.
- 5.. Construction traffic management plan to be submitted and approved before commencement of construction;
6. School travel plans for both schools to be submitted and approved prior to opening.
7. I would also recommend a planning condition that the core start and end times of the two schools should be offset by 30 minutes or other time to be agreed in writing.

It is anticipated that a Section 278 agreement would be required for all works within the adopted highway.

Other recommendations:

1. Minor changes are recommended to the parking layout to reduce the permeability in the vicinity of the site exit, in order to reduce the possibility of queues stretching back from the exit and onto Seal Hollow Road.
2. The western pedestrian island at the junction of the A25 with Seal Hollow Road should be lengthened and widened to at least 1.8 metres. This would provide increased pedestrian capacity and safety.
3. A signalised crossing should be provided across Seal Hollow Road outside the school. A signalised crossing would have a greater initial expenditure than a school crossing patrol, but would have lower running costs, and would be available to help pedestrians at all times including pupils from after-school clubs.

Yours sincerely,

Peter Slaughter
Development Planner

Appendix 2

Proposed redevelopment of the former Wildernesse School
KCC/SE/0375/2013 Response to KCC enquiry 6 January from Wildernesse Residents
Association.

We wish to emphasise from the outset that our planning objections are not raised against efforts to redevelop this site for educational purposes. We share popular support for that objective. Our objections relate to major planning issues relating to access, traffic congestion, and possible over-development, issues we feel are being poorly considered and are being allowed to go by default. As presently submitted we consider the development will - to the contrary - prevent these issues being addressed either from the outset or in the future.

1. We have obtained initial comments from a well-qualified professional WRA member upon the Transport Assessment included with the application. His remarks are attached. Whilst self-explanatory it should be observed that they are extremely questioning of the present advice upon which the application appears to rely.
2. When Wildernesse School - essentially serving its near locality - was fully operational at the peak evening period (from 4 - 6pm) standing traffic invariably reached back as far as Blackhall Lane. As a resident along this stretch I was personally well-placed to witness this and the consequent air pollution. In the mornings I understand there was equivalent congestion along the A25 Seal Road east of the traffic lights. The application now proposes two schools of more than double the capacity with simple T-junction access to Seal Hollow Road. This implies a very high increment of traffic movements (2000 or more has been suggested), whether of bus, coach or parents "dropping off" (see remarks in 'initial comments' on user profiles). Like other main access routes to Sevenoaks to the west and south it appears the town's eastern access is also now likely to be blocked for extended periods.
3. Seal Hollow Road and the roads connected to it are highly unsuitable for heavy commuter traffic, coaches or the double-deck buses which may be contemplated, particularly at its top (southern) end. In the past five years the road has also suffered noticeable escalation in use at peak - indeed all - hours as a major route into the town and as a short cut to the A21. This is considered to be the direct knock-on effect of congestion at Bat & Ball, at Riverhead, and the perennial M26 slip road issue.
4. The building work is likely to be taking place at the same time as a development in preparation at Wildernesse (formerly Dorton House) creating a substantial increment of heavy vehicles in the area.
5. The A25 at Bat & Ball is notorious for heavy air pollution. The likely heavy congestion from the contemplated developments will substantially add to air pollution around the A25/Seal Hollow Road junction reaching back to Seal village and southwards up to Blackhall Lane. Quite apart from health considerations and the nuisance to local residents this is quite contrary to any programme Kent CC may have in place to reduce air pollution at hotspots in the Sevenoaks /Seal area, notably along the A25.
6. Significant surface flooding occurs along Seal Hollow Road and along the A25 after modest rainfall and the NE part of the school site is also subject to medium flooding risk. It is difficult to see that the substantial increment of developed area (car-parks, roofing, footpaths etc.) will not exacerbate this tendency.

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7. The T-junction access points proposed to Seal Hollow Road are totally misconceived and wholly inadequate. There appears currently ample opportunity for the design of the site to allocate area that will allow access for vehicles without interrupting the flow of traffic along the A25 and Seal Hollow Road. Whether this is achieved by a one-way system, some form of gyratory or even a roundabout or equivalent realignment of the A25 obviously should be studied. It is not acceptable for a design for the two schools to be approved without consideration of these issues. As proposed the layout would severely limit any future attempt to address such problems.

As noted at the outset we fully support the redevelopment of a school on this site. However we note the appearance of four-storey units since the earlier presentation and suspect other necessary additions may follow. It would be particularly unfortunate if the (understandable) desire to cram two schools on to one site is promoting over-development, and inadequate regard for the very real access and congestion problems we have identified.

Tony Aston
as Chairman - Wildernesse Residents Association
Eildon, Seal Hollow Road, Sevenoaks, TN13 3SF

INITIAL OBSERVATIONS ON TRANSPORT ASSESSMENT - KCC/SE/0375/2013
Wildernesse Site Redevelopment Proposals Transport Assessment

I write as a strong supporter of the schools development, a local resident and as a highly experienced consulting civil/highway engineer responsible, in the past, for numerous multidisciplinary infrastructure developments.

I wish to raise my considerable concerns regarding the findings and conclusion of this Transport Assessment for the reasons I cite below:-

1. This is one of the most optimistic traffic surveys/assessment I have ever read. Each and every assumption is based on the "best" possible situation in traffic terms occurring; finding there is no reason not to progress as shown, yet the conclusions still are forced to include the statement that the junction capacity at the connection of the A25 and Seal Hollow Road will be exceeded at times.
2. Local experience shows this junction is indeed often congested at present and given that the former school closed in 2010, the impact of some 2050 pupils plus over 200 staff gives measure to the problems that can be expected when the planned schools open. The new schools are expected to operate successfully with virtually the same egress and exit points into the narrow Seal Hollow Road as that for the previous Wildernesse school which at peak had approximately only 50% of the pupils/staff proposed, reduced to only 538 by 2009.
3. The traffic survey was conducted in June when the days are at their longest and the weather generally "good". Had the survey been taken in January, either last year when on occasions there was significant snowfalls or this year when Seal Hollow Road was subject to flooding, the figures would be entirely different. Excluding those "extreme events", it is obvious to all those who live in Sevenoaks and its environs that traffic levels are much higher in poorer weather and when the days are short, than in the summertime. So these are the wrong baseline figures on which to establish whether there is a potential traffic problem with this development. Perfectly acceptable as a basis to establish that there is "little or no problem".
4. Even if bus usage levels are those stated, the suggestion that they will run at full capacity as quoted in the document carrying 75 to 90 pupils is clearly overoptimistic and furthermore noting that very few buses hold 90-seated passengers. Allowance must be made for the fact that these levels will not be achieved and therefore the pupils must arrive by a greater number of bus movements or other means.
5. There is no experience that can establish the future likely geographic home location of the attendees of the Faith/Free School. Putting any reliance on the "expressions of interest" today when the school has only just started functioning on a different site would be wrong.
6. With regard to the grammar school Annex, it is a matter of published fact that the majority of the pupils come from "better off families" and these will typically always choose to deliver their children by car --- as is the experience across Sevenoaks currently with other schools with "not-dissimilar" pupil profiles. The old Wildernesse School had a totally different pupil profile and therefore no meaningful comparison should or could be made.

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7. “These” Wildernesse School pupils will now have transferred to the Knowle Academy. Therefore while reference to the Knowle Academy could give some guidance, by definition, there will be significant differences between its pupil profile and the two proposed schools on this site.
8. The layout proposed for the school egress, exit and parking gives rise for considerable concern. Even if the assessment of vehicle movements are as predicted, the likelihood of the system functioning satisfactorily is extremely low for the following reasons:-
 - To introduce a 30 minutes displacement of school starting times is a positive decision, but to imagine that this will lead to a “uniform distribution across the entire period” would be highly optimistic. Arrival times will depend on a whole host of factors entirely outside the control of the schools and hence unexpected but frequent “peaks and troughs” must be factored into the figures and their impact assessed.
 - Seal Hollow Road is a single carriageway with relatively narrow lanes and a footpath only on the West side. Stationary vehicles waiting to turn into the school totally block the northbound traffic that wishes to pass through to the junction with the A25.
 - The distance between the egress and exit is approximately 50m with the stacking capacity to hold just 8 cars waiting to turn into the school before the rear vehicle is approximately opposite the exit. This will occur either because of oncoming traffic preventing turning into the school or congestion within the car/bus park. There will then be a buildup of traffic behind, which when released will reach the traffic lights, they being only 50 m further on. If stopped, traffic wishing to enter the school will be prevented from doing so thus adding further to the congestion. A total “logjam” of vehicles is almost inevitable since this section of road will include the buses returning to the A25 having delivered the pupils to one of the schools, noting that it takes only 3 buses to reach from the traffic lights to the egress point of the school
 - With stationary traffic in front of it, exit from the site northbound along Seal Hollow Road will be impossible.
 - The Vehicle Sweep diagrams purport to show only entry and exit of buses from the A25 with almost frightening potential for collision or delay for entry. This raises serious question about the hazards to “pedestrians” within the site. Couple this with the summary as given in Para 9.10 of the Report, the potential for very long and frequent delays at the A25 Seal Hollow Road junction is extremely high. The narrowness of the south end of Seal Hollow Road makes alternative bus routes virtually impossible.

Para 9.10 *“Junction capacity assessments were carried out for A25/Seal Hollow Road signalised junction for the current year and 2018 with and without the fully occupied schools. The previous traffic associated with the permitted use of the Site for a 1260 student roll was not used in the assessment as requested by KCC Highways. The planning fallback position has therefore been removed so the impacts are predicted to be far higher than would typically be the case. **The junction is operating in 2018 without the development with limited capacity but over capacity with the development.** The ‘with development’ scenario would increase queue lengths by 18,11 and 7 cars on the A25 east, A25 west and Seal Hollow Road approaches respectively. To help alleviate these flows the traffic signals would be installed with MOVA equipment (Microprocessor Optimised Vehicle Actuation) which can reduce delays by 10% at urban junctions”.*

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- Many parents will choose to deliver their children by car as stated in the Report by dropping them off “remote from the site”. The important question has not been addressed as to where this could be and, as importantly, the level and nature of traffic movements/congestion/parking that this introduces in some of the local roads, of which there are very few.
 - Much of the AM traffic is said to be travelling north along Seal Hollow Road. If it is from central Sevenoaks, then it is introducing very large traffic volumes along the extremely narrow section of the southern end of Seal Hollow Road adjacent to the Knowle Estate, bounded by the stone wall. If the cars and mini-buses do not come by this route, what roads can be realistically used? All are narrow and the local estate urban roads lined with residents parked cars. In any event, none have the capacity to accommodate large traffic volumes.
 - It is obvious that traffic levels will be extremely high on all the roads approaching the schools, indeed very much higher than at present. Yet even at present, very few cyclists, let alone children, choose to risk their lives on these roads even in summer. It is almost unimaginable to think that parents will allow their children to cycle to this school, certainly in anything other than perfect summer conditions. They will come by other means and the figures need to realistically acknowledge this.
 - The numbers of children said to walk to the school is going to be highly dependent on the “social profile” of the pupils. While optimism may lead to the view that car delivery by parents will be relatively low and perhaps forced by circumstance to be lower, this is a very unsatisfactory way in which to assess the probable traffic movements to this site. It is worth noting that Sevenoaks has one of the highest number of cars per household in the UK at it is very unlikely that these vehicles will not be used when children's lives are potentially at risk, as parents see it.
9. Most worrying of all, is that there appears to be an acceptance that nothing can be done in the future to improve the road network or access to this proposed development. Certain proposed mitigating measures appear to add further vehicular traffic problems e.g. pedestrian crossing to allow large numbers of pupils to enter and leave the school. There is no suggestion of even a subway or pedestrian bridge that could be regarded as the least expensive of any physical problem alleviating solutions. These are often not ideal solutions, for various reasons, which suggests far-reaching proposals must be put in place to separate pedestrians and traffic while allowing free traffic movement.
10. Reference has been made to the Knole Academy, where a vehicular underpass provides connection for traffic travelling on the westbound A25. At the entrance/exit the A25 is 3 lanes wide, the centre lane potentially providing turning vehicle refuge and also allowing the safe turning of large vehicles that could otherwise confront oncoming vehicles. This is in stark contrast to what is being proposed at the Wildernesse schools site. Knole Academy with some 1550 pupils is not without its traffic problems and surely the warning signs are more than evident that the problems at the Wildernesse site with approximately 25% more pupils being 2050, will be many times worse. When in the future that is clearly demonstrated with the school fully functioning, what happens next?
11. The impact of the congestion that will be introduced by this school development will be not be limited to those attending but on all the surrounding roads with regard to traffic congestion and parking. Furthermore the A25 is often congested due to problems on the M25, which never has had the connections at the M25 Junction 5 that would have done much to alleviate this problem.

12. Much of the traffic that currently leaves Sevenoaks to take the pupils to local grammar schools elsewhere will now travel to this new school site. It is clear that this will lead to much higher levels of traffic through the Bat & Ball junction, which again has been stated to remain unchanged after the opening of the school. Congestion daily at this junction is normal on many days of the year and mainly at the school opening and closing times.

The proposals on how to accommodate the construction traffic from this very large site are yet to be published but it is clear that the use of the existing egress and exit will lead to very significant problems. An alternative must be found.

In summary, despite the reassuring conclusion in Para 9.14 of this Report, that:-

“there are no transport or highways reasons to prevent the re-development of the site for continued school use with the site improvements and mitigation measures proposed”.

The reality is that there will be very considerable problems with traffic both entering and leaving the school complex and in the surrounding roads to this site as lightly alluded to in Para 9.11

“In terms of traffic impact the assessment of the local highway network would suggest that the immediate junctions would operate over capacity in the AM peak hour only, with the proposed development, despite the mitigation measures being implemented”.

No detailed consideration has been given to the PM “leaving school” time period which is likely to also be problematic. The Report presumes it is “non-peak” however experience of local residents shows that there are significant levels of traffic occurring at this time, not least, because of the activity associated with the journeys related to other schools nearby.

Despite all the warning signs, no physical solutions have been put forward or indeed allowed for in the future, when the inevitable occurs. To overtly recognise this and not to identify potential highway solutions and apportion a budget to resolve them, would be little short of irresponsible. The very real problems presented by the development of this site for such a large number of pupils needs to be addressed frankly and very urgently. This issue cannot be brushed aside until the inevitable occurs, if for no other reason than major construction works local to the schools would introduce considerable new hazards to the very large number of pupils attending the schools, and be even more difficult to resolve than if undertaken prior to the school openings.

Yours sincerely,

Allan E. Churchman BSc, MSc, FEng, FICE, (FIHE Retd.)