

Proposed expansion of Knockhall Community Primary School, Eynsford Road, Greenhithe – DA/14/209 (KCC/DA/0029/2014)

A report by Head of Planning Applications Group to Planning Applications Committee on 19 November 2014.

Application by Kent County Council, Property & Infrastructure Support for the demolition of the existing dining hall and kitchen with the erection of a new two storey, six classroom block with associated ancillary accommodation; erection of a new single storey dining hall and kitchen; provision of 33 additional car parking spaces and new access with drop-off facility from Eynsford Road at Knockhall Community Primary School, Eynsford Road, Greenhithe – DA/14/209 (KCC/DA/0029/2014).

Recommendation: permission be granted subject to conditions.

Local Member: Mr Peter Harman

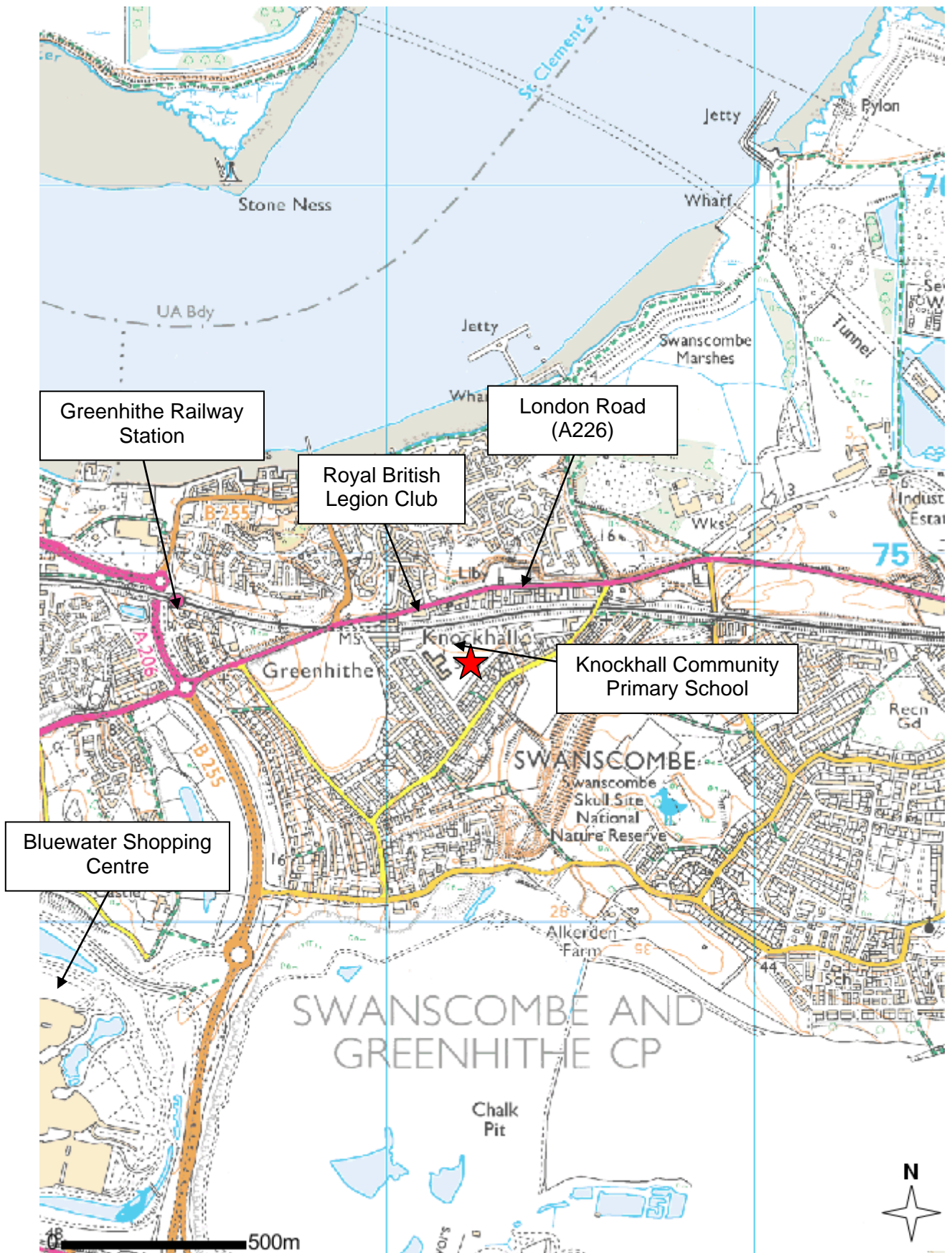
Classification: Unrestricted

Site Description

1. Knockhall Community Primary School is located on Eynsford Road, approximately 5 kilometres (3.1 miles) east of Dartford Town Centre. The school is located within a predominantly residential area with properties located to the south and east of the site. Greenhithe Community Market Garden is situated adjacent to the west of the site which forms part of the proposed development. A railway line runs to the north west of the school site. The school has recently gained academy status, although this proposal falls to be determined by the County Council, because of the County Council's interest in carrying out the proposed development.
2. The current school site comprises a part single and part two storey detached building which is of a brickwork construction with a render finish. The building has a mixture of flat and pitched roofs. The dining hall and kitchen, located to the south west of the site, are accommodated in a 'Horsa' type construction building. Another 'Horsa' building is located to the north of the kitchen and is used for a breakfast club. The school's hard play areas are located to the north west and north of the site, with playing fields situated further north. A car park for staff is located to the south west of the site, currently providing parking provision for 16 vehicles. A further 2 parking spaces are located outside the front of the school and 3 spaces outside the nursery. The school grounds also accommodate a single storey Sure Start Children's Centre and nursery located to the south east of the site. The schools pedestrian and vehicular entrances are located on Eynsford Road.
3. There are no site-specific Development Plan Policies identified in connection with the application site itself, although general policies are set out in paragraph (17).

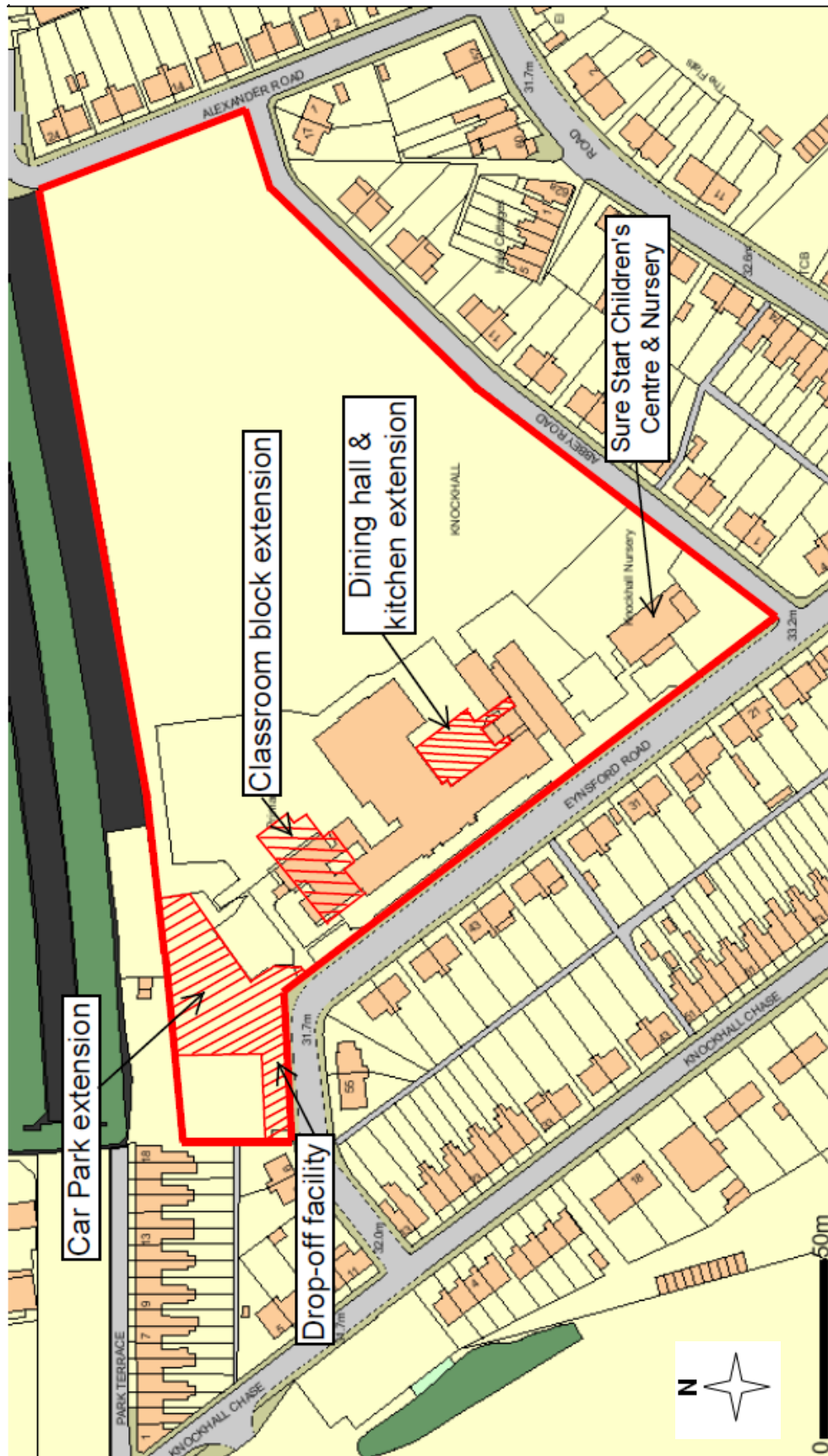
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Wider Site Location Plan



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Site Location Plan



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Relevant Planning History

4. In recent years Knockhall Community Primary School has been granted planning permission for a single storey modular building with two canopies and extended parking provision (DA/07/672) and an application for a single storey extension for the creation of a toilet facility. (DA/06/793) A nursery unit on the site was granted permission in September 2006 under permission reference DA/04/1186.

Background and Proposal

5. This application has been submitted by Kent County Council Property and Infrastructure Support and is part of the countywide Basic Needs Programme for educational purposes. The applicant states that the Borough of Dartford has seen significant growth in the pupil population over the last few years due to factors including the scale of housing development over the last decade, inward migration of families both from London and other parts of Kent and a rise in the birth rate. This inward migration has been far beyond historic levels and has resulted in a pressure on primary school places across the Borough.
6. The Commissioning Plan for Education Provision in Kent 2013-2018 provides forecasts that indicate an increase in the demand for primary school capacity which shows no signs of reducing over the forecast period. The forecasts for the Swanscombe and Greenhithe area support the view that without the expansion to Knockhall Primary School, the Local Authority will fail to meet its statutory obligations to provide sufficient school places in the Swanscombe and Greenhithe area. The deficit of places will be further exacerbated by the limited options for alternative expansions within the Dartford borough area.
7. Knockhall Community Primary School is currently a two form entry (2FE) school, accommodating 420 pupils. The expansion programme will enable an increase from 2 form entry to 3 form entry with a pupil admission number of 90 allowing for the provision of school accommodation for 630 pupils at the school.
8. The School currently employs 28 full time equivalent (FTE) staff positions who are at the school site on a daily basis. The proposal will lead to an increase of 10 FTE additional staff members, bringing the total members of full time staff to 38.
9. An independent children centre and nursery is also located on the site of the primary school and offers 52 part time-time places to children between the ages of three to five years, with 26 sessions operating during the morning between 08:30 and 11:30 and 12:30 and 26 sessions during the afternoon between 12:30 and 15:30.
10. The application proposes the demolition of the existing dining hall and kitchen with the erection of a new two storey; six classroom block with associated ancillary accommodation; the erection of a new single storey dining hall and kitchen; the provision of 33 additional car parking spaces and new access with drop-off facility from Eynsford Road.
11. The proposed extension to the west of the main school building following the demolition of the existing dining hall and kitchen would accommodate 6 additional classrooms with associated storage and cloak areas, together with additional toilet facilities, staircase and lift. The extension would be linked to the existing school through an existing corridor in the west elevation. The proposed classroom extension would be a rendered masonry

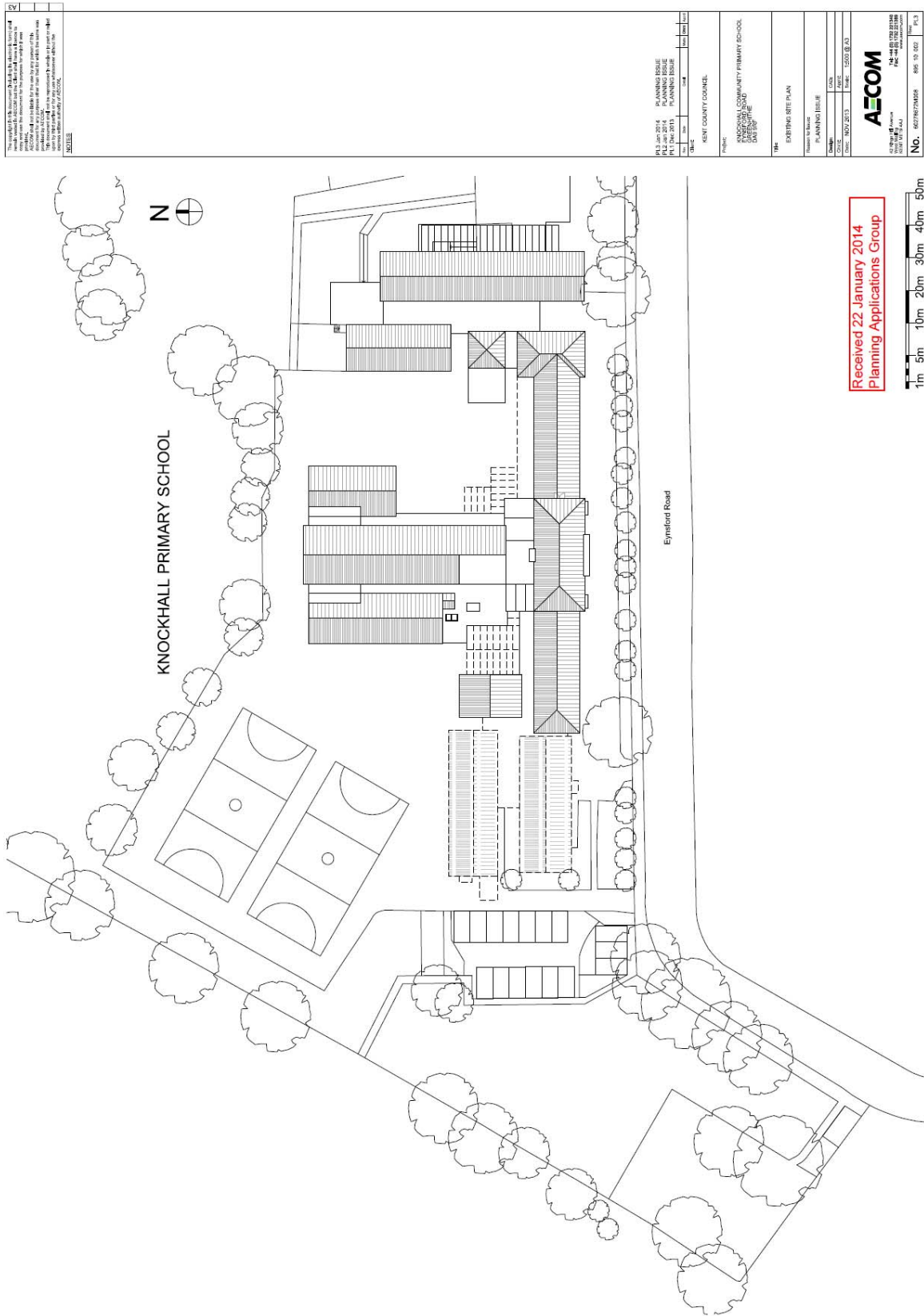
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construction with feature glazing units to the main circulation areas. The windows and doors would be matching polyester powder coated aluminium framed units to reflect the external materials of the existing school building. A shallow pitched roof is proposed to the classroom extension with overhanging eaves.

12. A new dining hall is proposed as part of the development as the existing hall does not comply with the current Department for Education and County Council recommended size regulations for a 3FE intake. The proposed dining hall and associated kitchen area would be located in an extension situated at the heart of the school. The extension would be single storey timber frame construction with a rendered blockwork envelope with details to match the existing school building and glazing to the northern elevation, overlooking the playing fields. The dining hall extension would have a flat roof with individual glazed rooflights.
13. The proposals also include the creation of 33 additional car parking and parents drop-off facility to accommodate the increase in staff and pupil numbers. This would be located on the site of the existing allotments which are now closed. Part of the allotment site would remain as either community allotments or a nature area associated with the school. The proposed parent drop off zone, accessible in a one-way arrangement from Eynsford Road would enable the temporary parking of 5 vehicles at any one time.
14. Seven trees are proposed to be removed to accommodate the proposed car park extension with partial removal of trees located within the vicinity of the proposed drop-off zone. Replacement tree planting as part of a detailed landscape scheme would be requested via a planning condition should permission be granted.
15. The proposed extensions feature energy efficient heating and ventilation systems as well as Sustainable Urban Drainage Systems to reduce the risk of flooding including rainwater harvesting and a green roof to the link corridor, providing access from the main school building to the proposed classroom block.
16. The application is accompanied by a Transport Statement setting out the potential impact the proposed expansion of pupil numbers would have on the surrounding local highway network. Through the successful adoption of the School's Travel Plan, the applicants' transport consultant concludes that this will help to mitigate the traffic impacts of the proposed development. The proposed additional 33 car parking spaces for staff and visitor use and the parents drop off facility have been proposed to mitigate the current and potential future congestion issues on surrounding local roads.

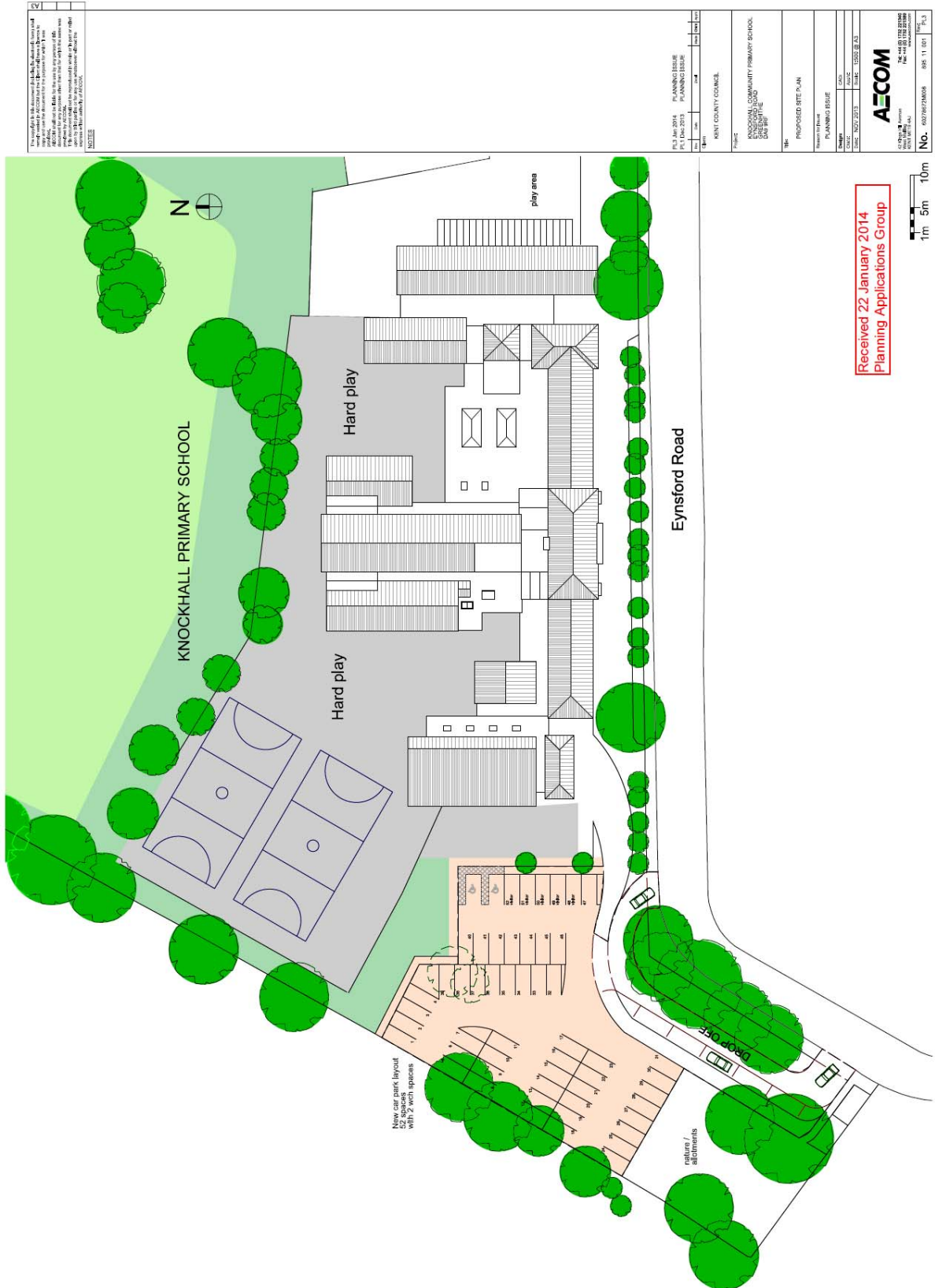
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Existing Site Plan



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Proposed Site Plan



Planning Policy Context

17. The following Guidance/Statements and Development Plan Policies summarised below are relevant to the consideration of the application:

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

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

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

- consideration of whether the opportunities for sustainable transport have been taken up and safe and suitable access to the site can be achieved for all people;
- achieving the requirement for high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
- the great importance that the Government attaches to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities, and that great weight should be given to the need to create, expand or alter schools; and that
- Local Planning Authorities should take a proactive, positive and collaborative approach to meeting this requirement and to development that will widen choice in education.

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

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

Policy B1 Development proposals should be appropriate for the location and should not have a detrimental amenity impact on the local area. A high standard of design should be implemented in proposals with layout, materials, adequate infrastructure, access and parking taken into consideration

Policy B12 Archaeology sites will be preserved and protected.

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- Policy RT15** Development proposals involving the loss of educational open space will not normally be permitted where the open space is important to the environment and amenity of the area in which it is situated, or where the use of the site meets an important local need.
- Policy S6** Development proposals should conserve and improve the existing built environment and a high quality and standard of design shall be achieved in new development.
- Policy T19** Development proposals should be appropriately related to the highway network and not generate volumes of traffic in excess of the capacity of the highway network.
- Policy T23** Development proposals should include adequate off-street parking facilities.
- Policy T27** Development proposals shall make adequate provision for pedestrians.

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

- Policy CS21** **Community Services:** Ensure the effective provision of community services.
- Policy CS15** **Managing Transport Demand:** Development proposals which generate additional traffic should use measures to encourage sustainable patterns of travel including travel plans and Car Parking Supplementary Planning Document.

(v) **Dartford Car Parking Supplementary Planning Document (Adopted July 2012)**

Schools should have a parking standard of 1 space per 15 pupils is indicated for employees and 1 space per 2 classes for visitors.

Consultations

18. **Dartford Borough Council** – Raises no objection to the proposals subject to further consultation in due course on a scheme of landscaping to be submitted, the implementation of tree protection measures for trees to be retained on site, the submission of a School Travel Plan and possibility of revising the design and linkage of the buildings. The applicant's architect has commented that the existing school buildings have a mixture of different roof types and the six classroom block extension uses those roof types in its design with the main roof matching the two storey part of the existing school on the front elevation. The Borough Council accepts this response and would not like to comment further. The Borough Council was also consulted on additional ecological and transport information provided by the applicant in support of the application and they raise no objections subject to the County Council's technical advisors being satisfied with the additional information.

Swanscombe & Greenhithe Town Council – Raises concerns and believes that the local road network is not currently able to cope with the traffic associated with the school and consider that the expansion would put additional pressure on local roads. The Town Council raises concern that the site visit observing traffic on local roads, detailed in the Transport Statement, was not undertaken at an appropriate time and does not fully reflect the traffic issues associated with the school. The Town Council believes that there are serious

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highway safety issues which could put children's safety at risk.

Following further consultations with the Town Council regarding the submission of a revised School Travel Plan and a detailed Traffic Survey and accompanying statement, the Town Council has no further observations to make on the proposals.

The Environment Agency – Raises no objections upon receipt of a Preliminary Risk Assessment investigating the risk of contamination to controlled waters. This is subject to the implementation of a planning condition detailing that no infiltration of surface water drainage shall be made into the ground without prior approval from the County Planning Authority. Additionally, the Environment Agency advise that if contamination is found, the developer should address risks to controlled waters from contamination at the site.

Kent County Council Highways and Transportation – Raises no objection to the application. Initially noted that further information from the applicant was required including the School Travel Plan or any details of the robust measures that would be required to address the increase in traffic expected from the expanded school.

A site visit conducted by KCC's Highways and Transportation officer during school closing time indicated that cars and vans lined Eynsford Road on both sides except where there were waiting restrictions. Cars were also parked on yellow zig-zag markings and double yellow lines. Abbey Road and Knockhall Chase were also lined with parked cars, with some partially parked on the footway. It was also noted that during school travel times, parked cars effectively narrow Eynsford Road to become single-track with few passing places, sometimes creating conflicting traffic movements. Additionally, the level of traffic makes Eynsford Road unsuitable for child cyclists.

Following consultation on additional transport information including a Traffic Survey, Transport Note and updated School Travel Plan, KCC Highways and Transportation officer conducted a further site visit to the school, observing the parking conditions along the local roads surrounding the school. It was noted that the School had taken action to discourage drivers from parking on the yellow zig-zag road markings outside the school with only one driver parked here at the time of the visit.

It is noted that the highways issues which are of particular relevance to this site are the narrow footways; parents parking their cars on footways; parents parking their cars on double yellow lines in Knockhall Chase and consideration that smoother traffic flows could be achieved in Eynsford Road if the School could persuade parents to adopt a voluntary one-way system. KCC Highways and Transportation officer recommends that the School should once again make parents aware of parking restrictions along local roads.

KCC Highways and Transportation advisor notes that from the parking layout plan, it appears that many of the proposed parking spaces would be difficult to access because they would be accessed via an aisle width less than the standard 6 metres between the rows of parking spaces. It is noted that there is sufficient space to increase the aisle width to 6 metres and that the plans should be amended to reflect this. It is considered that this could be carried out as part of a planning condition, through the submission of a revised car parking layout plan, should permission of the proposed development be granted.

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KCC Highways and Transportation do not consider that the proposed development would cause any highways issues of sufficient severity to warrant any objection on highways grounds under the National Planning Policy Framework and therefore wish to raise no objection to the application subject to the implementation of conditions including the submission of revised details of car parking and vehicular accesses, showing aisle widths of 6 metres, and showing proposed signage including ENTRANCE on the western access and EXIT on the eastern access; submission of an updated School Travel Plan every year up to and including 2019; submission of a construction management plan including details of wheel washing for construction vehicles, details of parking during construction, and an undertaking that no heavy goods vehicles are to reverse into or out of the site unless under the supervision of a banksman. Additionally, subject to planning permission being granted for the application, informatives encouraging the School to advise parents to utilise a voluntary one-way system north to south along Eynsford Road and that the granting of planning permission does not convey any approval for construction of the new vehicle crossover (i.e. dropped kerb) or any other works in the highway or affecting it.

The County Council's School Travel Plan Advisor – Provides various comments on the content of the School Travel Plan and suggests details that should be included in the Travel Plan. Should planning permission for the proposed development be granted, I would consider it appropriate to request a revision to the School Travel Plan via a planning condition.

The County Council's Biodiversity Officer – Originally commented that insufficient ecological information had been provided and additional information regarding the impact that the proposed development could possibly have on reptiles, confirming presence or likely absence and to inform the need for, and design of an appropriate mitigation strategy. Further survey work relating to bats and Great Crested Newts (GCN) was also requested prior to determination of the application due to the potential habitats present on site.

Further to the submission of a Reptile Survey which indicated that no reptiles were observed using the site and were therefore unlikely to be affected by the proposed development and precautionary approach recommendations during works on site to limit any potential impact, KCC's Biodiversity Officer considers the recommendations detailed within the report satisfactory. The County Council's Biodiversity Officer supports the results of the Bat Survey which has indicated that no roosting bats were recorded on site and as such no restrictions to the demolition of buildings in relation to potential bat impacts are needed. It is considered that there could possibly be indirect impacts if there is disturbance of the tree line along the southern boundary. This mature tree line has been assessed as being used as a bat commuting route. Consequently KCC's Biodiversity Officer advises that if changes to the existing lighting are proposed, lighting is designed to be sensitive to bat use of the site. This could be secured via a planning condition should permission for the proposed development be granted.

KCC's Biodiversity Officer considers that the findings of the GCN survey, which indicated no presence of GCN within the on-site pond, are satisfactory and therefore no specific mitigation strategies are required.

The ecological information provided by the applicant suggests a number of recommendations to minimise the potential for adverse ecological impacts. KCC's Biodiversity Officer comments that these precautionary approach measures should be delivered through the submission of a Construction Environmental Management Plan as a planning condition.

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It is noted that the ecological reports recommend the creation of habitat for wildlife that would mitigate for the habitat loss. The County Council's Biodiversity officer also considers that landscaping of the site should include measures to provide opportunities for wildlife given the overall loss of biodiversity through the development proposals. These ecological enhancement recommendations could be delivered through the submission of an Ecological Design Strategy as a planning condition should the planning application gain approval.

Subject to the following planning conditions being imposed on any permission, KCC's Biodiversity Officer raises no objections to the development proposals.

The County Council's Landscape Officer – Raises no objection, however notes that not all the trees on site appear to have been considered in the Tree Survey. The County Council's Landscape officer supports the retention of many of the trees on site but requires further information in order to assess the impacts of the proposal on the trees on site, in particular, the trees to be retained and Root Protection Zones shown on the proposed layout plan. Subsequently the Landscape officer has requested that an Arboricultural Method Statement explaining how the construction would be carried out with regard to the retained trees and a Tree Protection Plan be submitted as part of conditions subject to the grant of planning permission.

The County Archaeologist – raises no objection, subject to the imposition of a condition requiring the applicant to submit details of a programme of archaeological work prior to commencement of the development. This is due to the application site being located in an area of potential archaeological interest. Therefore it is possible that proposed development works may disturb archaeological remains.

Local Member

18. The County Council Local Member Mr Peter Harman was notified of the application on 13 February 2014 and re-notified on 9 July 2014 following the submission of additional highways and transport information.

Publicity

19. The application was publicised by the posting of a site notice at the main school entrance located on Eynsford Road. The individual notification of 52 neighbouring properties was carried out as part of the application.

Representations

20. I have received 4 letters/emails of objection to the proposal to date. The main points of objection are summarised as follows:-

Access, Parking and Highway Safety

- Concerns regarding the accuracy of the Transport Statement (*Note that further traffic survey work has been undertaken by the applicant to support the Transport Statement*)
- Concern that part time staff would appear to park on Eynsford Road
- Suggestion that all staff should be issued with a key to access the school car park to discourage parking on local roads
- Concerns regarding the current levels of traffic along surrounding roads and the safety implications that this currently creates and the belief that the school expansion would exacerbate the problem

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- Vehicles park-on 'School Keep Clear' yellow markings which is dangerous for pupils and parents
- School parents park in local roads and blocking driveways which is a nuisance to local residents
- Concern that drivers ignore the 20 mph speed limit in force in the vicinity of the school
- Recognise the improved parking facilities and drop off/pick up would be beneficial but believe more needs to be done as the school expands
- Suggestion that Eynsford Road could be made one-way enabling a freer flow of traffic
- Consider that the proposed increase in car parking spaces is not sufficient for the number of proposed staff
- Consider that the provision of the drop-off facility is inadequate as current parent behaviour has shown that parents arrive in advance of school pick up or drop off times and park on local roads to ensure they have a parking space
- Concerns regarding lack of access for emergency service vehicles

Drainage Issues

- Concern regarding the regular flooding of the storm drains close to the proposed location of the drop-off facility (*Note: detailed design of a Sustainable Urban Drainage System to resolve this issue could be requested as a planning condition should permission for the proposed development be granted*).

Discussion

Introduction

21. The application seeks planning permission for the demolition of the existing dining hall and kitchen with the erection of a new two storey, six classroom block with associated ancillary accommodation; the erection of a new single storey dining hall and kitchen and provision of 33 additional car parking spaces and new access with drop-off facility from Eynsford Road. The application is being reported to the Planning Applications Committee as a result of the objections received from Swanscombe & Greenhithe Town Council and local residents.
22. In considering this proposal regard must be had to Development Plan policies outlined in paragraph 17 above. Section 38(6) of the Planning and Compulsory Purchase Act (2004) states that applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. Therefore, the proposal needs to be considered in the context of Development Plan Policies, Government Guidance and other material planning considerations including those arising from consultation and publicity. The other aspects to consider are issues to do with the design, layout and scale of the development, residential amenity concerns and the implications of the proposal on the local road network and highway safety considerations.

Need

23. The strong policy support for the development of schools should also be considered to ensure that there is sufficient provision to meet growing demand, increased choice and raised educational standards, subject to being satisfied on amenity and other material considerations. In the Government's view the creation and development of schools is strongly in the national interest and planning authorities should support this objective, in a manner consistent with their statutory obligations. In considering proposals for the creation, expansion and alteration of schools, the Government considers that there is a strong presumption in favour of state funded schools, as expressed in the National Planning Policy

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Framework and reflected in the Policy Statement for Schools. Planning authorities should give full and thorough consideration to the importance of enabling such development, attaching significant weight to the need to establish and develop state funded schools, and making full use of their planning powers to support such development, only imposing conditions that are absolutely necessary and that meet the tests set out in Circular 11/95.

Design, Layout and Scale of Development Issues

24. The layout of the proposed development aims to provide the most feasible option for providing more teaching and ancillary accommodation to allow for the proposed expansion of pupil numbers at the school. The application documents show other layout options for the proposed development which were investigated by the applicant's architect including proposals investigating a two-storey extension to the existing dining hall however these were dismissed as being unfeasible due to the impact on the school during construction and effects on the external playing fields and hard play areas. Consequently, the chosen design comprises the demolition of the existing dining hall and kitchen adjacent to the car park and erection of a two-storey classroom extension. A new dining hall and kitchen extension would be located at the heart of the school. In my view the proposed layout of the development is acceptable in design and layout terms and provides the most coherent option considered by the applicant's architect.
25. The proposed development has been designed to match the existing school buildings and is reflected in the choice of external materials and colour scheme chosen. The proposed classroom extension would be a rendered masonry construction with feature glazing units to the main circulation areas. The windows and doors would be matching polyester powder coated aluminium framed units to reflect the external materials of the existing school building. A shallow pitched roof is proposed to the classroom extension with overhanging eaves. The dining hall roof would be a flat roof with individual glazed rooflights with glazing to the northern elevation, overlooking the playing fields. Subject to permission being granted, a planning condition requiring the submission of details of external materials prior to the construction of the development could be stipulated.
26. Dartford Borough Council has requested that the applicant consider the possibility of revising the design and linkage of the proposed classroom block extension as the Borough Council consider that it does not relate to the existing school buildings with different roof heights and styles. The applicant's architect notes that the existing school buildings have a mixture of different roof types and the six classroom block extension uses those roof types in its design with the main roof matching the two storey part of the existing school on the front elevation. The Borough Council accepts this response and would not like to comment further on this issue. I consider that the link provides an acceptable solution to connect the single storey element of the existing main school building and two storey classroom block.
27. The proposed classroom block extension would be two storeys, and the main school building does have a two storey element. The height of the two storey classroom block is 7m (23 feet) and the scale of the classroom block would be reduced through the shallow pitch design of the roof. The proposed dining hall extension would be single storey with flat roof, reducing the scale of the extension. In my opinion, the scale and massing of the proposed development is acceptable and in keeping with the existing school buildings.

Access, Parking, Traffic and Highway Safety

28. The school currently has provision for the parking of 16 vehicles within the staff car park, and allocation of 2 spaces in front of the school. A further 3 car parking spaces are located

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outside the nursery. Access and egress into the main car park, which is provided with a gated entrance, is served by a vehicle crossover from Eynsford Road. The parking proposals seek to provide an additional parking area adjacent to the existing car park, on land currently associated with the Greenhithe Community Market Garden (although no longer in use). This car park would accommodate a total of 54 vehicles including 2 disabled spaces. Dartford Borough Council's Car Parking Supplementary Planning Document which is part of the Borough Council's Local Development Framework states a parking standard guidance of 1 space per 15 pupils for employees and 1 space per 2 classes for pupils/visitors. At full 3 form entry, the school would be able to accommodate 630 pupils within 16 classes should planning consent be given. This equates to a parking standard of 50 spaces therefore the 54 parking spaces that would be provided as part of the proposals provide a level of parking which is above the recommendations. I consider that the proposed parking provision for staff and visitors is sufficient to accommodate the additional staff numbers associated with the school expansion.

29. A parents' drop off and pick up facility has been proposed as part of the application and would accommodate temporary parking for up to 5 vehicles. This facility is a measure which is supported by Dartford Borough Council's Car Parking Supplementary Planning Document. The facility would be accessed from Eynsford Road and adopt a one-way system and would be monitored by school staff to ensure its efficient use.
30. The Transport Statement submitted as part of the application concludes that the proposed expansion in pupil numbers would generate an additional 40 to 50 vehicle trips by parents of pupils at the start or end of the school day. The applicant considers that the implementation of traffic mitigation measures would help to manage the level of impact that the proposed expansion of pupils numbers would have on the local highway network. A parents' drop off and pick up facility with an additional 33 parking spaces within the school car park have been proposed as part of this application in order to mitigate the traffic and parking impacts that will result from the expansion of the school.
31. Several local residents have raised concerns regarding staff parking on local roads, causing an inconvenience to residents. A local resident also considers that the current access to the existing car park deters part time staff from parking on site, encouraging parking on local roads as a key fob is required to access the staff car park and not all part time staff are in possession of a key. The applicant states that staff parking access would be improved as part of the proposed development through the installation of electronic access gates to the car park, enabling both part time and full time staff to gain access.
32. Following consultation with Swanscombe and Greenhithe Town Council and local residents on the application as originally submitted, concerns were raised regarding the accurate depiction of the levels of traffic on roads surrounding the school from the site visit carried out by the applicant's Transport consultant. Furthermore, Kent County Council Highways and Transportation officer also requested that the applicant demonstrate that the development proposals would not have a significantly detrimental impact on the local road network and specific measures to mitigate the levels of increased traffic in addition to the increased car parking provision and pupil drop off zone. Subsequently, the applicant's transport consultant has submitted further information in response to the transport issues raised by consultees and local residents. The additional information includes a Traffic Survey undertaken between 07:00 and 17:00 hours on two school days, a Transport Note assessing the results of the survey and providing a number of recommendations to reduce traffic and an updated School Travel Plan outlining measures to encourage sustainable methods of travel.

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33. The results of the Traffic Survey indicate that during the survey period the peak demand periods recorded were for short periods at around 08:40 and 15:00 hours. The applicant's transport consultant recognises that some parking/waiting occurred across residents' driveways and on double yellow lines during these periods close to the school. It is also noted that even during peak times, there was spare parking capacity, although very limited, on parts of the surrounding roads closest to the school. On-site staff parking was also fully utilised.
34. Swanscombe and Greenhithe Town Council and local residents have raised concerns that the local highway network already struggles to accommodate traffic associated with the school, and that on-street car parking by parents and staff is dangerous, and an inconvenience to local residents, particularly during peak school times. As with other schools, it is recognised that congestion issues exist on the local highway network before and after the school day. However, the applicant notes that due to the various before and after school activities that take place at the school, including a breakfast club starting at 07:30 and an after school club available until 18:00, arrivals and departures of parents with vehicles are staggered over a longer period, reducing the number of parent vehicles around peak school traffic times. Although traffic generated by the school causes inconvenience and delays to through traffic, this is considered to be a short term impact on local amenity rather than amounting to a wider highway safety concern. Any potential additional traffic on the local road network created by the school's expansion could effectively be managed by the various traffic mitigation measures that are being proposed as part of this application.
35. The applicant is supportive of any general initiatives that the County Council would wish to introduce to reduce parking in areas where restrictions apply and reduce levels of congestion including additional parking enforcement or one-way routes along surrounding roads. Local residents, who have made representation on the proposals, have also supported the use of a one-way system for vehicles travelling along Eynsford Road. KCC Highways and Transportation officer considers that the introduction of a voluntary one-way system for parents along Eynsford Road would enable freer flows of traffic and suggests that the School investigate the implementation of this measure. In particular, this suggestion has been successfully introduced elsewhere and being informal it does not inconvenience neighbouring residents in the way that a formally adopted one-way system might.
36. The applicant's transport consultant considers that car based trips to the school could be reduced through the implementation of an updated School Travel Plan. Various measures have been proposed as part of the School Travel Plan including the setting up of a Walking Bus to encourage pupils to walk to school, and investigating the possible use of the Royal British Legion car park located on London Road, to the north of the railway line as a school drop-off/pick-point with associated walking buses as a short term measure until the new drop-off facility has been constructed and promotion of sustainable modes of transport. Annual monitoring and review of the School Travel Plan to ensure that the objectives of the Travel Plan are being met could be addressed via a planning condition. KCC's Highways and Transportation consider that annual monitoring of the Travel Plan up to and including 2019 would be appropriate. The comments and advice provided by KCC's School Travel Plan advisor should be taken into consideration in the updated School Travel Plan.
37. Recognition needs to be made when considering this proposal that all schools generate traffic movements and often involve some parking on the public highway, but unless that constitutes a severe risk to road safety then that is not a reason to withhold planning consent. In particular, the public highway is there to be used as such, and that use is not reserved for any one type of user, be they residents, visitors or employees. Moreover, I consider that the proposed drop off facility, provision of an additional 33 parking spaces and measures in the

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School Travel Plan would provide sufficient mitigation to accommodate the increase in vehicles associated with the expansion of the school. The updating and annual review of the School Travel Plan would assist in mitigating the potential impacts the proposed expansion in pupil numbers may have. Kent County Council Highways and Transportation are satisfied that this proposal would not have an overly detrimental impact on the local highway network sufficient to warrant refusing planning permission, and raise no objection on that basis.

38. Taking the professional advice received from KCC Highways & Transportation into account, I would consider the proposal acceptable in highway terms subject to the imposition of conditions covering details of a construction management plan to be submitted prior to commencement of works on site including 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, details of how the site access would be managed to avoid peak school times and details of any construction accesses and an undertaking that no heavy goods vehicles are to reverse into or out of the site unless under the supervision of a banksman and updating of the School Travel Plan within 6 months of occupation of the classroom block. The submission and implementation of a Construction Management Plan would help to minimise disruption to the day-to-day functioning of the school and minimise disruption to local residents.

Construction

38. The applicant intends that the demolition and construction work would be phased with the construction of the new dining hall and kitchen and subsequent demolition and construction of the classroom block extension. This would minimise disruption to the daily running of the school. Given that the school is located in a predominantly residential area, if planning permission is granted it is considered appropriate to impose a condition restricting hours of construction 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.
39. In addition, I consider it appropriate that details of a Construction Management Strategy be submitted for approval prior to the commencement of development should permission be granted. The strategy should 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, details of how the site access would be managed to avoid peak school times and details of any construction accesses and an undertaking that no heavy goods vehicles are to reverse into or out of the site unless under the supervision of a banksman. I consider that the submission of details relating to the management of construction on site would ensure that residential amenity is protected as well as the safe management of construction on site.

Biodiversity

40. Further protected species survey work relating to reptiles, bats and great crested newts (GCN) was submitted by the applicant further to additional information being requested by KCC's Biodiversity Officer concerning the potential impact the proposed development could possibly have on these species due to the potential habitats present on site. The Reptile Survey indicated a lack of presence of reptiles, recommending precautionary approach methods to be undertaken during works on site to limit any potential impact. The Bat Survey recorded no roosting bats on site and therefore no restrictions are necessary for the demolition of buildings in relation to potential bat impacts. The Biodiversity Officer recommends that any changes to the existing lighting proposed should be sensitively

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designed so as to have minimum impact on bats. The results of the GCN Survey indicated no presence of GCN within the on-site pond and consequently no mitigation measures are required. The ecological information provided by the applicant suggests a number of recommendations to minimise the potential for adverse ecological impacts. The Biodiversity Officer comments that these precautionary approach measures should be delivered through the submission of a Construction Environmental Management Plan as a planning condition. The NPPF encourages opportunities to incorporate biodiversity in and around developments, subsequently management recommendations to enhance the nature area for biodiversity should be investigated. As the proposed car park extension would cause the loss of some biodiversity on site, the applicant has suggested a number of ecological enhancement measures which the Biodiversity Officer considers could be implemented through the submission of an Ecological Design Strategy as a planning condition should permission be granted. Subject to planning permission being granted, I would consider it appropriate to impose planning conditions requiring any changes to the existing lighting to be sensitively designed and the submission of a Construction Management Plan and Ecological Design Strategy.

Landscaping

41. The application is accompanied by a Tree Survey which has assessed a total of 22 trees as being a category C (low amenity value due to age, class and arboricultural impairments). The implementation of the proposed car park and parents' drop-off facility would necessitate the removal of at least 7 trees within the footprint of the car park extension and partial removal of trees located within the vicinity of the parents' drop-off facility. KCC's Landscape Officer supports the retention of many of the trees on site but requests further information as part of a planning condition showing trees to be retained on site and Root Protection Zones on a Tree Protection Plan and an Arboricultural Method Statement, explaining how the construction works would be carried out with regard to the retained trees. Therefore I would consider it appropriate to impose conditions covering the submission of these details and a scheme of landscaping subject to the grant of planning permission.

Drainage and land contamination

42. Several local residents have commented on the flooding of the storm drains close to the proposed location of the drop-off facility and hope that this would be resolved as part of the proposals. The application is accompanied by a Flood Risk Assessment which has noted no historic records of flooding to Knockhall Community Primary School and recommends the incorporation of Sustainable Urban Drainage Systems (SuDS) in the development to reduce the probability of sewer surcharging in the local area during a storm event due to run-off from the site. These measures include the use of green roofs and rainwater harvesting. Additionally a number of low-flow devices have been recommended within the newly proposed kitchen and toilet facilities to reduce the potential impacts to the foul discharge to sewers. Furthermore, the Environment Agency raises no objection to the proposal, subject to a condition to control the infiltration of surface water drainage. I would consider it appropriate to impose conditions covering the submission of details of SuDS measures within the vicinity of the drop-off zone and no infiltration of surface water drainage.

Archaeology

43. The County Archaeologist has indicated that the school grounds close to a possible Iron Age settlement which consequently may have archaeological potential. Therefore it is possible that proposed development works may disturb archaeological remains. Consequently, a condition requesting a programme of archaeological work should be imposed on any

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planning permission. In my view, this approach is appropriate and proportionate to the development being proposed and is also in accordance with Policy B12 of the adopted Local Plan.

Conclusion

44. Concerns have been raised regarding the impact of the proposed development on various aspects including residential amenity, design aspects and traffic and highway safety issues. Having assessed each of these areas of concern, in my view, the development would not give rise to any significant material harm sufficient to warrant withholding planning consent. The proposed development is in accordance with the general aims and objectives of the relevant Development Plan Policies. In addition, the development is sustainable and in accordance with the principles of the National Planning Policy Framework and the Policy Statement on Planning for School Development. I consider that, subject to the imposition of appropriate planning conditions, this proposal would not have a significantly detrimental impact on residential amenity, design and layout aspects and traffic/parking issues.

Recommendation

45. I RECOMMEND that PLANNING PERMISSION BE GRANTED SUBJECT to conditions, including conditions covering:

- the standard 5 year time limit;
- 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 revised details of car parking and vehicular accesses, showing aisle widths of 6 metres, and showing proposed signage including ENTRANCE on the western access and EXIT on the eastern access;
- the provision and retention of the vehicle parking spaces;
- the submission and approval of an updated School Travel Plan within 6 months of occupation of the classroom block, implementation and on-going annual review;
- a programme of archaeological work to be submitted and approved;
- if any changes to the existing lighting are proposed, these shall be designed to be sensitive to bat use of the site;
- the development to be undertaken in accordance with the recommendations of the Ecological Survey and protected species surveys;
- no vegetation clearance to take place during the bird breeding season;
- the submission and approval of a Construction Environmental Management Plan;
- the submission and approval of an Ecological Design Strategy;
- the submission and approval of a scheme of landscaping;
- the submission and approval of a Tree Protection Plan and the development to be undertaken in accordance with the recommendations of the Tree Survey;
- the submission and approval of an Arboricultural Method Statement explaining how the construction would be carried out with regard to the retained trees;
- the inclusion of tree protection measures;
- the submission and approval of a detailed design for a Sustainable Urban Drainage System scheme to improve drainage in the vicinity of the parents' drop-off facility;
- no infiltration of surface water drainage;
- the submission and approval of a Construction Management Strategy, including 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

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facilities, details of how the site access would be managed to avoid peak school times and details of any construction accesses and an undertaking that no heavy goods vehicles are to reverse into or out of the site unless under the supervision of a banksman;

- measures to prevent mud and debris being deposited onto the public highway;
- 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.

I FURTHER RECOMMEND that the applicant be advised by informative of:

- The School to advise parents to use a voluntary one-way system north to south along Eynsford Road.
- The granting of planning permission does not convey any approval for construction of the new vehicle crossover (i.e. dropped kerb) or any other works in the highway or affecting it. A licence must be obtained for such works. The Applicant should contact Kent County Council Highways and Transportation (web: http://www.kent.gov.uk/roads_and_transport/highway_improvements/parking/dropped_kerbs.aspx telephone: 0300 418181) in order to obtain the necessary Application Pack. Please allow at least eight weeks notice.
- If contamination is found the developer should address risks to controlled waters from contamination at the site, following the requirements of NPPF and the Environment Agency's (EA) Guiding Principles for Land Contamination.
The EA recommends that developers should:
 - a) Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.
 - b) Refer to the EA's Guiding Principles for land contamination for the type of information that they require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
 - c) Refer to the Environment Agency's website at <https://www.gov.uk/government/organisations/environment-agency> for more information.

Case officer – Hardeep Hunjan	03000 413397
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Background documents - See section heading
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