

SECTION D
DEVELOPMENT TO BE CARRIED OUT BY THE COUNTY COUNCIL

Background Documents: the deposited documents; views and representations received as referred to in the reports and included in the development proposals dossier for each case; and other documents as might be additionally indicated.

Item D1

New 2 form entry primary school at land at St George's CofE Foundation School, Broadstairs – M/TH/15/0294 (KCC/TH/0122/2015)

A report by Head of Planning Applications Group to Planning Applications Committee on 21st October 2015.

Application by Kent County Council Property and Infrastructure Support for the creation of a new 2 form entry primary school, improvements to existing access to Westwood Road, car parking and pick up/drop off bays, external play areas including a MUGA, informal play area and grass playing field and hard and soft landscaping, at land at St George's CofE Foundation School, Westwood Road, Broadstairs – M/TH/15/0294 (KCC/TH/0122/2015)

Recommendation: the application be referred to the Secretary of State for Communities and Local Government, and subject to his decision, that planning permission be granted, subject to conditions.

Local Members: Mr A Terry and Mrs Z Wiltshire

Classification: Unrestricted

Site

1. This application relates to part of the existing St George's Secondary School grounds in Broadstairs, and currently forms part of the playing fields for this school. The site lies outside of, but adjacent to, the settlement boundary of Broadstairs, and therefore is sited in 'open countryside' as defined in the Thanet Local Plan, and this area is also designated as a Green Wedge. The site lies on the northern side of Westwood Road, and to the north of the existing Kent County Council Landscape Services depot and opposite the Perrys Vauxhall Garage. Immediately to the north and west of the site is open agricultural land, and adjoining the eastern boundary is the playing field for the secondary school. The Landscape Services yard forms part of the southern boundary, alongside Enterprise Rent-a-Car, whilst the remainder is bounded by three residential properties which lie between the access and the public footpath.
2. From a wider perspective, the site lies on the western edge of Broadstairs itself, and the complex of Westwood Cross Retail Parks lies further to the west, past Poorhole Lane. A ribbon of housing is located along Westwood Road between the site and the secondary school, with both off road and on street parking along the road. The Perrys Vauxhall garage is located on the southern side of Westwood Road opposite the site, which currently has a dedicated right hand turn lane into it.
3. The site is grassed and was laid out with pitches and football nets. There is mature screening surrounding the site, with an earth bund on the western edge. A public footpath runs along the eastern boundary of the site linking Westwood Road to the south and the agricultural land to the north. This footpath dissects the two existing areas of playing fields of St George's Secondary School.

New 2 form entry primary school at land at St George's CofE Foundation School, Broadstairs – M/TH/15/0294 (KCC/TH/0122/2015)

Background

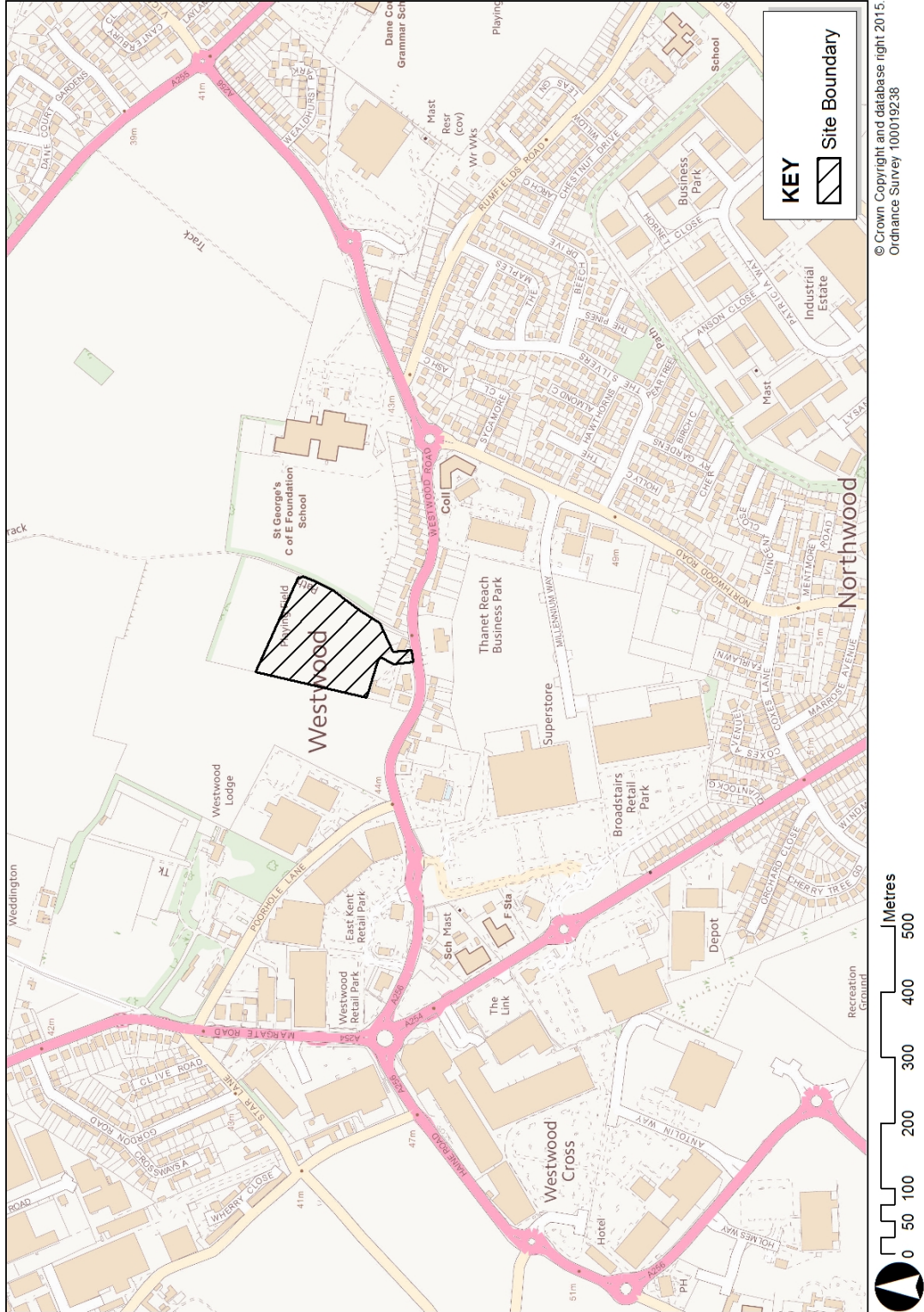
4. The applicants have submitted a statement which sets out the future provision required for primary education in the Thanet area, and which shows that there is a significant demand for primary places over the next five years. A table showing the assessment undertaken for each of the schools in the 5 Thanet planning groups has also been included, which sets out which schools have the ability or not to be expanded.
5. At present children are being offered places outside of their immediate locality, which has an impact on families moving into those areas, and results in more car journeys. An additional 990 temporary and permanent places have been added since 2011 and current expansion projects will add another 420 places over the next 7 years. However, the latest forecast for primary school places within a 2 mile radius of St George's shows a predicted deficit of places rising from a shortfall of 161 places in 2016/2017 to 365 places in 2018/2019.
6. The background information concludes that without the additional primary places proposed through this planning application, children in Broadstairs would be unable to attend a local school.

Recent Site History

7. The existing St George's Secondary School was given planning permission in 2008 under reference TH/08/167, and included the site of this current application as part of the playing field layout. A further application for a synthetic training pitch was approved in 2010, but this lies within the playing field to be retained for the secondary school, to the north-east of the current application site.
8. Two further planning applications are also recorded on Thanet District Council's website which relate to the erection of a three storey building to be used for education (6th form) and community use, and also for the erection of 12 no. 12m high floodlights for the sports pitches. Neither of these affect the current application.

New 2 form entry primary school at land at St George's CofE Foundation School, Broadstairs - M/TH/15/0294 (KCC/TH/0122/2015)

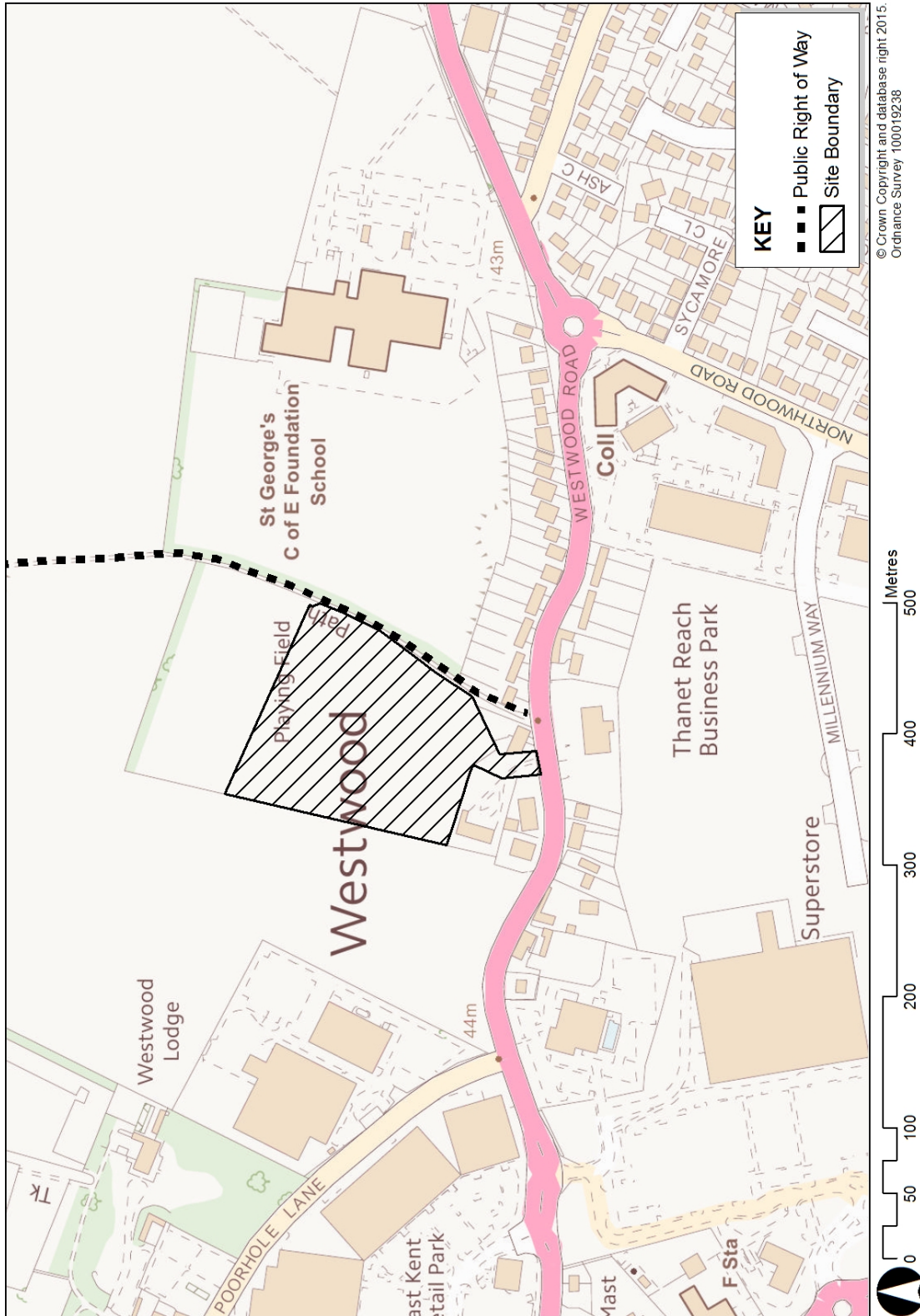
General Location Plan



© Crown Copyright and database right 2015.
Ordnance Survey 100019238

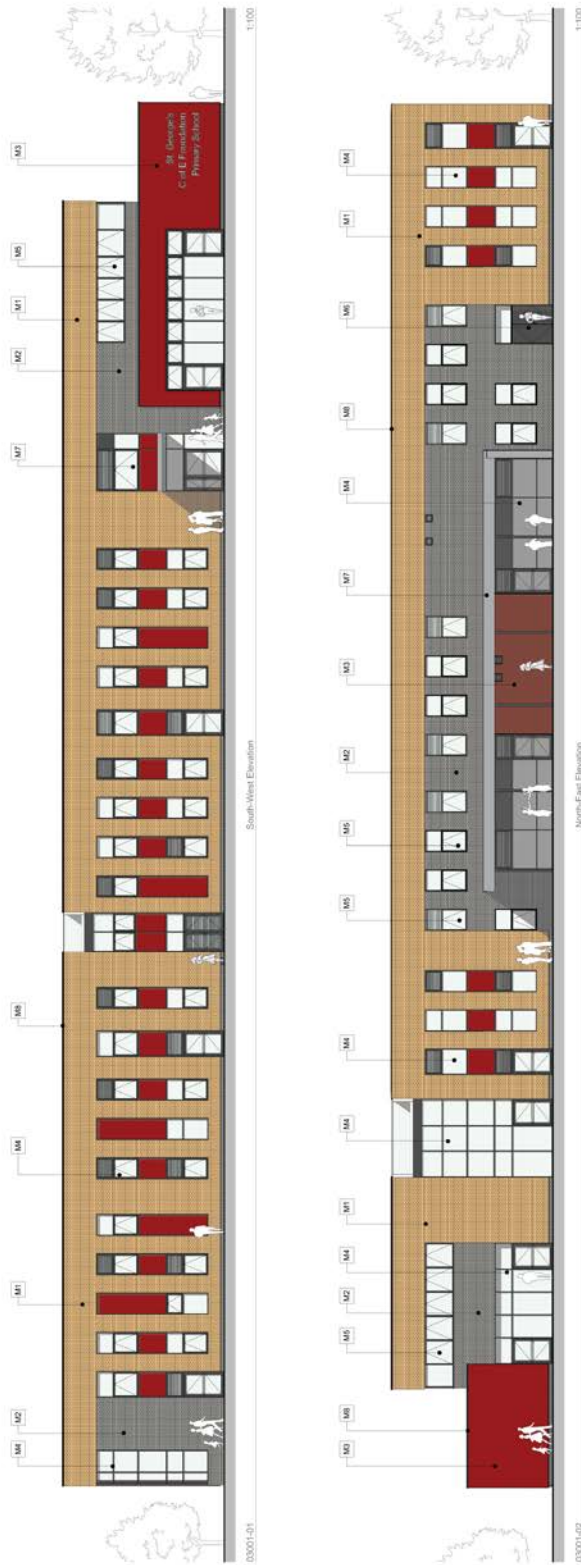
New 2 form entry primary school at land at St George's CofE Foundation School, Broadstairs - M/TH/15/0294 (KCC/TH/0122/2015)

Site Location Plan



New 2 form entry primary school at land at St George's CofE Foundation School, Broadstairs - M/TH/15/0294 (KCC/TH/0122/2015)

Proposed Elevations



PRELIMINARY

Bond Bryan Architects
 www.bondbryan.co.uk
 1442199 02720 | www.bondbryan.com
 1442199 02720 | www.bondbryan.com
 1442199 02720 | www.bondbryan.com

Kent Primary Schools
St. Georges C of E Primary School
Broadstairs
Kent County Council

Proposed Elevations

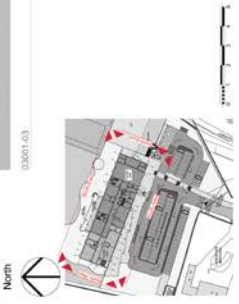
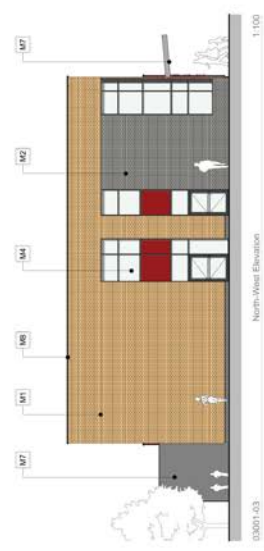
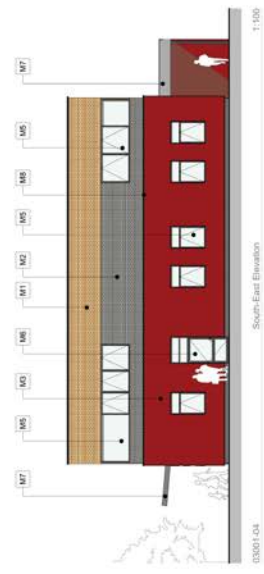
Client: Kent County Council
 Date: 14.02.2015
 Scale: 1:100 @ A1

SYG BBA ZD ZZ DR A 03001

Industry: Education
 Project: St. Georges C of E Primary School
 Status: Preliminary

The drawings are the property of Bond Bryan Architects and are not to be used, copied, reproduced or otherwise disseminated without the written consent of Bond Bryan Architects. The drawings are for information only and are not to be used for construction purposes.

- M1 - Brick Buff
- M2 - Brick Grey
- M3 - Brick Red
- M4 - Powder coated aluminium extruded with double glazed units, opaque (Frame Colour: Grey)
- M5 - Powder coated aluminium extruded with double glazed units, opaque (Frame Colour: Grey)
- M6 - Powder coated aluminium extruded with double glazed units, opaque (Frame Colour: Grey)
- M7 - Powder coated aluminium extruded with double glazed units, opaque (Frame Colour: Grey)
- M8 - Powder coated aluminium profiled opaque - (Colour: Grey)



New 2 form entry primary school at land at St George's CofE Foundation School, Broadstairs – M/TH/15/0294 (KCC/TH/0122/2015)

Proposal

9. The planning application seeks approval for the construction of a new two form entry primary school, which along with the associated outdoor space would occupy approximately three quarters of the existing playing field. The remaining quarter, which would be at the northern end of the site, would be retained for the use of the secondary school.
10. Access into the site would remain in the same location as at present, but is proposed to be widened and amended to a left in, left out layout with a splitter island in the middle of the mouth of the access. The access road would be 6m wide, with a 1.8m wide footpath on the western side up to the internal zebra crossing, and a 3m wide footpath on the eastern side. On Westwood Road, the existing refuge island and right turn lane into Perry's garage would be removed, and a signal controlled crossing provided opposite 132 Westwood Road. Signage advising of a 'no right hand turn' into the school for cars approaching the site from the east would be located outside Perry's garage, and cars coming from this direction would need to proceed to the recently completed Poorhole Lane roundabout and come back to the site to enable them to enter with a left turn. Those exiting the site but wishing to travel west would need to turn left and proceed to the roundabout by the secondary school to undertake a 'U' turn, to avoid a right hand turn out of the site.
11. The access would lead to an on-site car park providing 80 car park spaces (including 5 disabled parking spaces) for both staff and visitor use. A layby for drop off parking is also proposed, along with an area for cycle parking and a cycle shelter. Pedestrian access from Westwood Road would be provided down the length of the eastern side of the access road, with a zebra crossing provided partway down to allow pedestrians to safely cross the access road, and further zebra crossings within the car park would provide a safe route to the school building. This access road would also be used for the KCC Landscape Services depot.
12. The building itself would be located to the north of the car park, and would have a linear footprint, running across the site in an east-west orientation. The main entrance would be at the eastern end, with the large school hall, kitchen facilities and general office and administration areas located at this end of the school at ground floor, and the classrooms extending to the west either side of a central corridor. The first floor would provide mostly classrooms, again either side of the central corridor, plus a smaller group room. A staircase would be located at either end of the building, and a lift at the eastern end.
13. The school would be of a flat roof design, with an area of the roof being made available for the siting of photo-voltaic panels. The facades would be broken up with the use of different materials - both buff and grey bricks, and dark red render. The windows would have a vertical emphasis, with panels of coloured render included to provide interest and relief to the window pattern. To the east of the main entrance and wrapping round the side of the main hall and kitchen area the materials would also be dark red render. Doors and windows would be powder coated aluminium in dark grey. A canopy would be provided above the external secure play space for the reception classrooms, which would match the materials of the windows and doors.
14. The school is proposed to be built in two phases, with the eastern end being built for the first phase which would include the administration areas, kitchen, main hall, and three

New 2 form entry primary school at land at St George's CofE Foundation School, Broadstairs – M/TH/15/0294 (KCC/TH/0122/2015)

classrooms at ground floor level, plus a further 5 classrooms at first floor. The western end would then be finished during the second phase to provide the additional 7 classrooms required for the second form of entry.

15. To the north of the school building would be the outside play space required for a two-form entry school. A Multi Use Games Area (MUGA) would be sited to the north-east of the building, providing facilities for netball, basketball, mini tennis and five a side. The grassed sports areas for mini rugby, mini hockey, football, rounders and a running track would all be provided at the northern end of the site.
16. A habitat area and soft landscaping would be provided along the western edge of the site, where the existing earth bank is located. Four small groups of trees would need to be removed as part of the development, but most of the boundary landscaping would be retained, and in particular the tree belt behind the closest residential properties is shown to be retained and protected by fencing.

Planning Policy

17. The most relevant Government Guidance and Development Plan Policies summarised below are pertinent to the consideration of this 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 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).

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.

New 2 form entry primary school at land at St George's CofE Foundation School, Broadstairs – M/TH/15/0294 (KCC/TH/0122/2015)

Paragraph 74 of the NPPF is also relevant to the consideration of this application, it states that:

Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless

- *an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- *the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- *the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.*

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.

(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.

(ii) **Thanet Local Plan (2006)**

Policy D1 All new development is required to provide high quality and inclusive design, sustainability, layout and materials.

Policy D2 Development proposals will be well landscaped and maximise the nature conservation opportunities wherever possible.

Policy HE11 Additional information in the form of an assessment of the archaeological or historic importance of a site may be required in order to assess and determine planning applications.

Policy CC1 Within the countryside, new development will not be permitted unless there is a need for the development that overrides the need to protect the countryside.

Policy CC5 Within the Green Wedge new development will not be permitted unless it can be demonstrated that the development is not detrimental or contrary to the stated aims of the Policy. New development that is permitted should make a positive contribution to the area in terms of siting, design, scale and use of materials. Open sports and recreational uses will be permitted subject to their being no overriding conflict with other policies and the wider objectives of the plan.

Policy CF1 Planning permission will be granted for new community facilities if the proposals are not contrary to other Local Plan policies and the

New 2 form entry primary school at land at St George's CofE Foundation School, Broadstairs – M/TH/15/0294 (KCC/TH/0122/2015)

community use and location are demonstrated as acceptable.

- Policy SR1** Proposals for the provision of new sports facilities including those provided by Schools, particularly where these proposals are available to the public will be permitted provided the location of the proposal is within or adjoining the urban areas, the intended use of compatible with surrounding land uses, the facilities are well related to the major transportation network and close to public transport, any built development is at an appropriate scale, design and siting, and that satisfactory arrangements are made for vehicular access and parking.
- Policy SR3** Proposals for the multiple use of existing facilities and new development which will create opportunities for recreational use by the public additional to the existing use of the facilities will normally be permitted.
- Policy SR12** Built development will not be permitted on playing fields if it would be detrimental to the character of the area. Moreover, no development will be permitted on land last used as playing field unless there are exceptional circumstances, including, amongst others: if the proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to sport and recreation as to outweigh the detriment caused by the loss of the playing field.
- Policy TR12** Substantial development generating travel demand will be required to provide convenient and secure cycle parking and changing facilities.
- Policy TR15** Development proposals likely to generate significant travel demand and/or traffic movement will be required to demonstrate, through Green Travel Plans, specific measures to encourage and facilitate the use of walking, cycling and public transport in preference to private car travel.
- Policy TR16** Proposals for development will be required to make satisfactory provision for the parking of vehicles (including, where appropriate, service vehicles).

Consultations

18. **Thanet District Council** raises no objection to the principle of the proposed development, but would expect that all due consideration is given to all other consultee advice received.

Broadstairs and St Peters Town Council unanimously recommends the application be approved but raises the access and traffic management impact as a concern.

Sport England objects to the application as they do not consider the scheme to accord with any of the exceptions in Sport England's playing fields policy or paragraph 74 of the NPPF. Further justification was received from the Applicant, which was sent to Sport England for their consideration, but they have maintained their objection.

New 2 form entry primary school at land at St George's CofE Foundation School, Broadstairs – M/TH/15/0294 (KCC/TH/0122/2015)

The County Council's Biodiversity Officer raises no objection subject to the imposition of conditions requiring the need for a biodiversity method statement, a construction environmental management plan and the securing of ecological enhancements within the landscaped areas.

County Archaeological Officer raises no objection subject to the imposition of a condition securing the implementation of archaeological field evaluation and the preservation of any important archaeological remains found on site.

The Environment Agency (Kent Area) has raised no objection subject to the imposition of conditions relating to contamination, remediation, surface water drainage and foundation design.

The County Council's Landscape Officer raises no objection subject to the imposition of a condition requiring a method statement to be submitted detailing how the trees to be retained will be protected during development.

The County Council's Sustainable Drainage Officer has raised no objection subject to the imposition of conditions relating to the submission of a fully detailed sustainable surface water drainage scheme; the implementation, maintenance and management of such a scheme; and that no infiltration of surface water drainage into the ground be permitted without the express written consent of the County Planning Authority.

Kent County Council Highways and Transportation confirm the revised access details are acceptable in principle and raise no objection to the proposals subject to the imposition of conditions to secure the provision of car and cycle parking prior to occupation; the access being laid out as shown prior to occupation; completion of the controlled crossing and highway alterations prior to occupation; the funding of parking control measures on Westwood Road should the need arise; and the submission of a Construction Management Plan.

The County Council's School Travel Planner has raised no objection subject to the imposition of a condition requiring the submission of a Travel Plan within 6 months of the occupation of the school.

Local Member

19. The local County Members, Mr Alan Terry and Mrs Zita Wiltshire were notified of the application on 28th April 2015.

Publicity

20. The application was publicised by the posting of two site notices, an advertisement in a local newspaper, and the individual notification of 74 residential properties.

Representations

21. In response to the publicity, 21 letters of representation have been received. 2 were received directly by the Planning Applications Group, whilst the other 19 were submitted by a local resident who lives close to the access to the site, who had canvassed the opinion of his neighbours by asking them to complete a questionnaire regarding the

New 2 form entry primary school at land at St George's CofE Foundation School, Broadstairs – M/TH/15/0294 (KCC/TH/0122/2015)

application. (It has not been made clear how many properties in total were given the questionnaire and therefore the level of response cannot be recorded). Along with his own letter of objection (the key points of which are included below) he has enclosed the 18 completed questionnaires, the results of which are tabled below. Additional comments made by those completing the questionnaires are also included in the summary list below.

22. The key points raised can be summarised as follows:

- Works to Poorhole Lane roundabout will be completely ruined by adding in the extra volume of new school traffic;
- Nowhere is allocated for off road parking for parents to drop off children;
- Given it is a primary school, parents will need to park their cars to walk into the school premises with their child;
- There is already congested roadside parking for residents, plus extra traffic for the two garages, neither of which have allocated customer parking;
- Traffic jams in the area are caused by transporter lorries dropping off and picking up cars, and also refuse vehicles;
- Emergency vehicles have trouble getting through as there is nowhere for road users to get out of the way;
- Having the access in this location is an accident waiting to happen;
- The proposed access is close to a blind bend and will be dangerous;
- Only allowing cars to turn left out of the access road will not solve the problem;
- Traffic is a major problem in the area and there should be off road parking for parents built into the plans;
- Any on site drop off facility would not be used once parents realise they cannot get back out of the school due to traffic on the road;
- There would be light and noise pollution to properties on Westwood Road;
- Hope adequate measures incorporated into screening the site and sighting of security lighting, etc.;
- Already problems with traffic trying to join the road from Perry's car sales, opposite the proposed school junction, causing accidents;
- It is dangerous for pedestrians walking along this road, especially the young, elderly and infirm;
- Cyclists use the footpath making it dangerous for residents to leave driveways;
- All attempts to slow traffic (i.e. yet another toucan crossing) have the effect of clogging up the road;
- If the school has to be off Westwood Road, the access should be off the Asda roundabout, with an access road to the rear of the secondary school, which could have drop off and pick up bays along it;
- New school should be built alongside the existing senior school where the infrastructure is already in place;
- There is already a litter problem in the area which is likely to get worse;
- We have no faith in KCC over Westwood Road;
- Statement of Community involvement is misleading and incorrect;
- Do not believe a two storey building is appropriate for a primary school;
- There could be noxious gases on site given historic use as an open cast clay pit;
- Piling for foundations could affect neighbouring properties;
- Do not believe there is a need for a new primary school in this area.

New 2 form entry primary school at land at St George's CofE Foundation School, Broadstairs – M/TH/15/0294 (KCC/TH/0122/2015)

23. Summary of responses to the resident's questionnaire:

Question	Yes	No	no answer
Do you approve of the proposal in its current form and the area in which it is proposed to be built?	1	17	
Would you be prepared to say yes if it was a single storey building?	2	16	
Would you be prepared to say yes if the proposed entry and exit to the site was changed?	6	11	1
Would you be prepared to agree if the school was situated somewhere else within the school boundary?	9	8	1
Do you feel the proposed entry and exit to the site poses problems with safety, congestion and air pollution?	18		
Do you think the extra traffic would have a negative effect on the existing volume of traffic?	17	1	
Do you believe that the siting of the school with this access presents a higher risk of accidents on Westwood Road?	17		1
Do you believe there is any need for another primary school in the Westwood area?	4	10	4
Were you made aware of the public consultation between 8th sept and 6th Oct?		18	
Were you aware of the public meeting at the school on 23rd Sept?	1	17	
Do you think one week was long enough notice given to attend the public exhibition?		18	
Do you think that one day's exhibition was enough to allow you to make an informed decision?		17	1

Discussion

24. In considering this proposal regard must be had to the 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 the Development Plan Policies, Government Guidance and other material planning considerations arising from consultation and publicity. In my opinion, the key material planning considerations in this particular case are the principle of siting a new primary school in this location and the need for additional primary school places; the siting, design and appearance of the proposed school; the traffic and parking implications of the new school on the surrounding area; any effect on the amenities of nearby residents; and the impact on the existing playing field provision.

Principle of Development in the Countryside and Green Wedge

25. The site lies outside of, but adjacent to, the settlement boundary of Broadstairs, and therefore is sited in 'open countryside' as defined in the Thanet Local Plan. This area of countryside is also designated as a Green Wedge and the relevant Policies CC1 and CC5 seek to restrict development in such locations unless there is a need for them that

New 2 form entry primary school at land at St George's CofE Foundation School, Broadstairs – M/TH/15/0294 (KCC/TH/0122/2015)

overrides the need to protect the countryside, and where such development would not contribute to the coalescence of the various Thanet towns.

26. This site lies right on the boundary of the urban area, and at the very southern edge of the largest green wedge in Thanet, whose function is to separate Broadstairs from Margate. The existing St George's secondary school, which this application site forms part of, is also located in the countryside (and green wedge) and forms an established education use in such an area. It needs to be borne in mind that the application site is already developed as part of an existing developed school site, and so it not a currently undeveloped site within the Green Wedge. The built form of the proposed school and the hard landscaped areas would all be sited at the southern end of the site, close to the urban boundary line. The building would therefore be viewed in the context of the existing built form on Westwood Road, and would actually extend into the green wedge to a lesser extent than the existing secondary school building.
27. As set out in the background section above the need for primary school places in Thanet is severe and providing a new school on part of an existing education site would meet this need, whilst having a minimal impact on the wider countryside due to its siting close to the urban boundary. It is therefore considered that the principle of providing the school in this location would be acceptable as an exception to the countryside protection Policies CC1 and CC5.

Access, Parking and Highway Impacts

28. Access to the site would utilise the existing entrance onto Westwood Road, which currently serves the Landscape Services depot. The access road would be upgraded to a 6m wide carriageway, and the junction widened and laid out as a 'left in left out' turning. The application was supported by a Transport Statement and a further addendum to the report, which have been assessed by the Council's Highways and Transportation Officers. A Safety Audit of the junction layout and pelican crossing has also been undertaken. Revised plans have been submitted which show the proposed mouth of the access having a splitter island included, which will physically prevent any right turn into or out of the access road.
29. The on-site car park would provide 80 parking spaces. 5 of these would be laid out for disabled users, 21 for staff use, and the remaining 54 for 'park and stride' visitor parking. A further layby area for the drop off and collection of older pupils would be provided in front of the building, catering for an additional 6 cars at any one time. Kent County Council's parking standards require 1 space to be provided per member of staff plus an additional 10% for visitors, and the proposed parking provision meets these standards.
30. Because the parking provision would be adequate for a 2FE school but with only a single form being provided in phase 1, there was concern raised that the overcapacity of parking would encourage all staff to travel by car. In order to address this initial over-provision of parking, it is proposed that 25 spaces be blocked off so that they cannot be used until the second phase is complete. A revised plan showing this parking layout has been submitted, which shows the middle section of parking being available for Phase 1, providing 14 staff parking spaces and 36 parent/visitor spaces, and the row of parking along the southern boundary being reserved for Phase 2. This phased provision of parking has been successfully deployed on other new school developments in the County, to address the same issue.

New 2 form entry primary school at land at St George's CofE Foundation School, Broadstairs – M/TH/15/0294 (KCC/TH/0122/2015)

31. In order to have in place a means of addressing any future parking problems should they arise once the school is opened, the applicants have submitted a Memorandum of Understanding, in which they have agreed to pay the costs of introducing a Traffic Regulation Order (£3000) to control on-street parking in the event that it is needed.
32. In order to encourage travel to school by means other than the private car, for both staff and parents, a condition requiring the School to produce a School Travel Plan within 6 months of occupation is proposed should the application be approved, and this should be reviewed annually thereafter through the Council's "Jambusters" website.
33. The majority of the objections received from occupiers of neighbouring properties relate to the traffic problems that are already experienced in the area, and the view that this new school development would exacerbate matters by introducing additional traffic on an already congested road network. Whilst it is acknowledged that the proposed school will generate vehicle movements on the road network leading to the school, some of these movements are already on the network with local pupils currently being taken to schools further afield. Some prospective parents with children attending nearby secondary schools will also already be travelling on the network, and will drop off/pick up at the new primary school as part of a linked trip, as will some prospective parents who are currently travelling to work on the local network.
34. The site lies in a sustainable location and it is considered that the provision of a controlled crossing on Westwood Road near the school will further encourage pedestrian trips. In addition, the sharing of administrative staff between the primary and secondary schools will also reduce car trips. Because the access has been designed to allow left in/left out turns only, there would be no waiting on Westwood Road by drivers trying to turn right into the site, and therefore the school traffic would not be responsible for obstructing the flow of traffic on Westwood Road.
35. Bearing in mind all of the above, the Highways and Transportation Officer has concluded that the proposed new school is unlikely to have a severe impact on the highway network and therefore raises no objection to the scheme, subject to the inclusion of various conditions. These are to ensure that vehicle and cycle parking is provided on site prior to the occupation of the school; that the vehicle parking is phased to ensure there would be no overprovision of parking for the first form of entry (phase 1); that the access layout, controlled crossing and highway alterations are all carried out prior to occupation of the school; that a Construction Management Plan be submitted for each phase to cover the provision of construction vehicle loading/unloading and turning facilities prior to the start on site and throughout the construction period, the provision of parking facilities for site personnel and visitors on site before work starts and throughout the construction period, and details of working hours and timing of deliveries. An informative would also need to be included to ensure that the applicants apply for the necessary highway consents and approvals for work to be carried out on the public highway.
36. It is therefore considered that the proposed scheme would accord with Policies TR12, TR15 and TR16 of the Thanet Local Plan.

Impact on Playing Field Provision

37. The proposed primary school would be built on an area which currently forms part of the playing field for St George's secondary school. Historic aerial photographs and the

New 2 form entry primary school at land at St George's CofE Foundation School, Broadstairs – M/TH/15/0294 (KCC/TH/0122/2015)

submitted 'Existing Playing Field Provision' plan show this area being laid out for both winter and summer games for use by the school. Access to this field from the existing secondary school (for pupils) is currently across the pitches adjacent to the school, and through the gaps in the hedgerow by the public footpath. Given that it is separated from the secondary school by the footpath the applicants advise that it is not as well used by the school as the field closest to it. Furthermore the fact that it is some distance away from the school changing facilities, means it is also unattractive to use by the community, who to date have made more use of the internal sports provision and the easterly playing field closest to the school building.

38. The applicants have submitted two plans showing the proposed playing field provision and a wider masterplan strategy. The overall provision that would be made on site would be as follows:

Primary School Sports Provision:

Winter Games

- Football pitch (U11/U12)
- Mini Rugby Union Pitch (U7/U8)

Summer Games

- Rounders (junior size)
- Mini Hockey (Grass) (junior size)
- 60m running track (grass) (U11/U12)

All Year Usage

- Mini Soccer Pitch (U11/U12)
- MUGA Court –
- x2 Netball (full size)
- x2 Tennis (full size)
- x2 Five a Side Football (Min size, secondary use to the above)

Multi-Use PE Space –

- x1 Basketball (full size)
- x4 Mini Tennis
- x1 Five a Side Football

Inner sports Hall –

- Badminton (full size)
- Mini Tennis

Secondary School Sports Provision:

Winter Games

- x3 Football pitch (U16/U17)
- Rugby League Pitch full size

Summer Games

- x2 Rounders (full size)
- x2 Soft ball Pitches (full size)
- Mini Hockey (Grass) (junior size)
- 400m Running Track (grass) with 100m sprint
- x2 Long Jumps
- 6 Wicket Cricket Pitch (Junior Level to Senior Level)

All Year Usage

MUGA Court –

- x3 Mini Tennis
- x3 Five a Side Football (Minimum size)
- x1 Netball (full size, secondary to above use)
- x1 Basketball (full size, secondary to above use)

Ball Court –

- x1 Tennis (full size)
- x1 Five a Side Football

New 2 form entry primary school at land at St George's CofE Foundation School, Broadstairs – M/TH/15/0294 (KCC/TH/0122/2015)

39. The existing secondary school has significant external sports provision and play areas, totalling 100,895sqm (1,086,000sqft) of external playing field (as defined by the DfE Advice for Disposal or Change of Use of Playing Fields and School Land). The required provision for a 1200 pupil secondary school is 69,000sqm (742,700sqft), therefore currently the school has an overprovision of 31,895sqm (343,400sqft) of playing field.
40. Under the proposed primary school layout, the existing secondary school would retain 77,366sqm (832,800sqft) of playing field area – an overprovision of 8366sqm (90,050sqft). The playing field provision associated with the primary school would be 17,516sqm (188,600sqft) which meets the DfE requirement for a 420 pupil primary school.
41. The proposed layout therefore meets the DfE requirements for playing field provision for the primary school and would still exceed that required for the secondary school.
42. The applicants have also submitted details of the adopted Open Space Assessment for Thanet, which was carried out in 2005 (published 2006), but which contains an assessment of provision and needs up to 2017. Thanet District Council has confirmed (in an email to the applicants dated 2nd September 2015) that they are currently in the process of preparing a specification to undertake further work on a new playing pitch strategy to support the emerging Local Plan, but that in the meantime the results published in 2006 are the most recent assessment of open space and outdoor sports facilities and therefore should be used in accordance with any planning application. This Open Space Assessment concluded that based on the population data available there was unlikely to be additional unmet demand for formal playing pitch provision up to 2017. Specifically the audit concluded that there was a surplus of cricket pitches (+2) in the Borough and senior football pitches (+4) but a deficit of junior football pitches (-7) to meet projected need.
43. The proposed layout for the new primary school would include the provision of a junior football pitch and rugby pitch, which the applicants state would make a valuable contribution towards meeting the identified deficit of junior football pitches in the Borough. The proposed primary school is intending to make all of the new sports facilities available to the wider community in the same way as the existing secondary school. As Schools are not legally obliged to offer their sports facilities for local community use, it is considered the fact they would do so, would be of significant benefit to the local community – a benefit that would not be there without the development of the new school. This would accord with the aspirations of Policy SR3 of the Thanet Local Plan, which seeks to maximise the use of existing and new sports facilities. A condition requiring the applicants to submit a Community Use Agreement can be included on any consent to ensure that the facilities are made available as proposed.
44. Sport England, in their original and subsequent response, state that the starting point for any assessment as to whether a proposal meets exception policy E1 of their guidance and the first bullet of paragraph 74 of the NPPF, is whether or not a robust and up to date assessment of needs of open space, sports and recreation facilities and opportunities for new provision has been carried out. Paragraph E14 of the Sport England guidance states that as a guide, if no review and subsequent update has been carried out within 3 years of the playing pitch strategy being signed off by the steering group, then Sport England would consider the information to be out of date. In the case of the Thanet Open Space Assessment, Sport England's view is that it does not constitute an up to date assessment of needs.

New 2 form entry primary school at land at St George's CofE Foundation School, Broadstairs – M/TH/15/0294 (KCC/TH/0122/2015)

45. Sport England has also advised that an assessment of playing field provision against the Department for Education guidance is inappropriate for meeting the requirements of exception policy E1 and the first bullet of paragraph 74 of the NPPF, as it only considers the needs of schools as opposed to the wider community need for playing fields. Furthermore they state that despite the plans being amended to show the sports facilities with the correct dimensions, the development remains first and foremost the construction of a new school building – it is not principally “an indoor or outdoor sports facility” or “alternative sports provision”. Therefore they consider that the scheme would not meet the circumstances described in exception Policy E5 of their Planning Policy either, or bullet point 3 of paragraph 74 of the NPPF.
46. Clearly it would not be possible to develop any part of this site for a new school without there being some net loss of playing field, and it is accepted that the proposals do not precisely comply with the exception policies of Sport England's guidance or the bullet points of paragraph 74 of the NPPF. However, the existing field is not well used at present due to its distance from the school, and the proposed layout would provide a variety of junior sports facilities, which not only meets an identified shortfall (with regard to the junior football/rugby pitch) but which would be available for wider community use. In addition the sports uses associated with the school would offer a better variety of facilities (playing field, MUGA and indoor provision) than the existing pitch layout.
47. In my opinion, although there is a maintained objection by Sport England, I consider that the provision of a new primary school to meet the needs of the local community, combined with the provision of new sports facilities associated with this and these being made available to the community, would outweigh the loss of part of the under-used existing playing field, especially when taking a longer term view and considering the proposals in a holistic and broader context rather than inflexibly adhering to policy wording. However, if Members are minded to permit the proposals, the application would need to be referred to the Secretary of State.
48. One aspiration from the Highways and Transportation advisor was for the inclusion of a direct pedestrian and cycle link between the two schools sites, and it was envisaged that this could be provided within the school grounds. However the provision of such a link would have had even further implications on the amount of sports provision that could be provided on the playing fields, and would require a significant amount of engineering works to be able to provide it, due to the change in levels in this part of the school site. Furthermore, the need to be able to link this with the existing Public Rights of Way network and how it would be lit create additional issues with such an aspiration. Given that there is an existing public footpath which runs along the carriageway of Westwood Road which would provide a safe, lit pathway between the two school sites, it is considered that the benefit of retaining as much playing field land as possible would outweigh the aspiration for a dual but more direct footpath link within the school grounds.

Siting, Design and Appearance

49. As set out in the Proposal section, the new school would be a two storey flat roof building with materials comprising buff and grey brickwork, red render and powder coated aluminium doors, windows and louvres in a dark grey. The flat roof design is common with many new schools and the layout follows the requirements of the Education Funding Agency for all new two form entry primary schools. It should be noted that there is very little opportunity now to depart from the Government imposed

New 2 form entry primary school at land at St George's CofE Foundation School, Broadstairs – M/TH/15/0294 (KCC/TH/0122/2015)

design templates for new schools, if Government funding is to be achieved, and that earlier examples of more individual or iconic Kent school building designs are no longer possible under the current Government's funding restrictions. The current design templates may be less striking in their visual appearance to some commentators, but they have the advantages of being functionally compact and ergonomically cost effective to construct, run and maintain, as well as achieving sound environmental performance standards. It needs to be borne in mind that all these factors are also important in contributing to design quality, as well as the impacts on the actual users of the building who clearly will experience it to the greatest extent.

50. The design of the school would reflect and complement the existing design of St George's secondary school and at two storeys in height would have a domestic scale, which would be generally in keeping with the residential development to the south of the site along Westwood Road, which is of a mixed but contemporary character. In terms of overall design, I consider that the scheme would accord with the principles of Policy D1 of the Thanet Local Plan.
51. An objection has been received relating to the appropriateness of a two storey building for a primary school, but it should be noted that this design conforms to the 'Baseline Designs' where reception and key stage 1 classrooms are provided at ground floor level, with direct access to the outside, whilst the key stage 2 classrooms (years 3 to 6) are provided at first floor level. A two storey design is no longer to be regarded as inappropriate for a primary school, since lifts and disabled facilities are included and most pupils will live in two storey housing at home. Moreover, the school would be similar in layout to other primary schools recently constructed in Kent and the rest of the country.

Amenity Impacts

52. The proposed school building would be sited some distance away from any neighbouring residential properties (55m/180ft at the closest point), and in terms of any direct impact from the building itself it is considered that this would be minimal. The existing boundary treatment along the edge of the site by 136–130 Westwood Road would be retained and this would provide an established and thick buffer to screen the staff car park and mitigate any noise from cars using the car park.
53. A 3m (10ft) landscape strip would be provided alongside the access road and footpath where it runs along the boundary with 136 Westwood Road, the closest property to the development. Although there would be more traffic using the school access road than the occupants of nearby houses are currently used to with the Landscape Services depot, the majority of the traffic movements would be limited to two short periods during the day at drop off and pick up, and only during term time; therefore it is considered that the layout would not result in a level of unacceptable disturbance for nearby occupants.
54. As with all schools, there would be a need for some external lighting to both the building and car park for security reasons, which has been raised as a potential disturbance issue in the objections received. The Design and Access Statement advises that lighting of the site would be through low level bollards and controlled with daylight sensors and time clocks, so as to avoid disturbance to nearby residents. There is no proposal to include any floodlights to the MUGA or playing pitch. It is considered that the exact lighting details could be sought via an appropriately worded condition, should the application be approved, along with a further condition removing the rights to erect

New 2 form entry primary school at land at St George's CofE Foundation School, Broadstairs – M/TH/15/0294 (KCC/TH/0122/2015)

any floodlighting without gaining subsequent prior planning permission from the Planning Authority.

55. Although the responses received from occupants of nearby properties indicate that they feel that there is no need for another primary school in the area, the data submitted from the Education Officer has clearly demonstrated that there is a shortfall of places in this area. In this regard, the County Council is duty bound to seek means of providing such school places and has to rely on empirical evidence rather than conjecture.

Other Matters

Contamination

56. A Phase 1 site assessment was undertaken in January 2015 which considered the potential contamination on site, and was submitted in support of the application. Given the historical ground workings on the site, and the vulnerable nature of the end users at the school, the report recommended that further ground investigation would need to be undertaken. That view was reiterated in the consultee response received from the Environment Agency, where no objection was raised, subject to the imposition of conditions relating to a site investigation scheme, detailed risk assessment, remediation strategy and verification report, plus a further condition regarding the process to follow should contamination be found on site that had not previously been identified.
57. The Environment Agency response also highlighted the fact that the site overlies a principle aquifer and is in a Source Protection Zone 1 for public water supply, therefore the groundwater environment is highly sensitive and should be protected from contamination risks. To this end they also requested the imposition of conditions restricting the infiltration of surface water drainage into the ground unless otherwise permitted by the County Planning Authority, and that no piling or other penetrative foundation methods be permitted without the express consent of the County Planning Authority.

Flood Risk and Drainage

58. A Flood Risk Assessment (FRA) has been submitted as part of the application given that the site area exceeds 1 hectare. The site lies within Flood Zone 1 (the lowest ranking of flood risk), where there is a low risk from fluvial flooding and this is reflected in the report. There is a risk from pluvial (rainwater) flooding in one location, but the FRA concludes that the risk is mitigated by its positioning within an external play area.
59. The County Council's Flood Risk and Drainage Officer has also considered the details submitted and has advised that prior to formulating a drainage strategy for the site that discharges to the public sewer network, the applicants should explore opportunities to implement a sustainable drainage system, and to this end two conditions are suggested which require the applicants to submit and implement a sustainable drainage strategy. Subject to these conditions being included, no objection was raised to the development.

Ecology and Biodiversity

60. The application was supported by the submission of an Ecological Appraisal, which set out the desk and field based surveys of the site and made recommendations regarding both habitats and vegetation, and protected and notable species and this has been

New 2 form entry primary school at land at St George's CofE Foundation School, Broadstairs – M/TH/15/0294 (KCC/TH/0122/2015)

assessed by the Council's Biodiversity Officer. The report concludes that the grassland habitats found within the site are of relatively low ecological value, whilst the woodland and scrub habitats are common and widespread in the vicinity, therefore may provide movement corridors for wildlife.

61. In terms of notable species the report concludes that there is no evidence of badgers or reptiles but that the habitats are suitable for foraging and roosting bats and provide optimum habitat for common woodland and garden birds. The Council's Biodiversity Officer requested additional information be submitted regarding the removal of part of the earth bank on the western boundary and a revised landscape plan was submitted which depicted the extent of the bank which would be removed. In response the Biodiversity Officer has confirmed that the removal of the earth bank would be acceptable, but that works should be undertaken sensitively with regard to any potential ecological impact and therefore requests that the submission of a 'Biodiversity Method Statement' be secured via condition, which should detail the measures that will be implemented to minimise ecological impacts, including the need for an ecologist to be present on site at key moments. A condition requiring a Construction Environmental Management Plan is also requested which would show how the retained section of earth bank would be protected during the construction process.
62. In terms of breeding birds, the report recommends that the removal of any trees should be undertaken to avoid the nesting season and if this is not possible that the trees should first be surveyed by a qualified ecologist. An informative reminding the applicant of this requirement is suggested. The trees to be removed were further assessed in terms of their bat roost potential and for both groups of trees the results showed they had negligible bat roost potential, with no cavities observed and only a light covering of ivy which would not provide shelter for bats to roost. It is therefore considered that the proposal would not have an adverse impact on any notable or protected species, and subject to the conditions and informative suggested would be acceptable in this regard.
63. In addition to the above, a condition requiring the landscaping of the site to include ecological enhancements has been requested, including the future management of the earth bank and the habitat areas marked on the school layout. Subject to these conditions the proposed development, in terms of ecology and biodiversity, is considered to be acceptable.

Landscape

64. The application site has an established boundary with mature trees and hedgerows that run around the perimeter of the site. Most of the perimeter landscaping would be retained, with small groups of trees being removed in three areas - by the access road, the MUGA and part of the car park. The boundary treatment to be retained would be protected by Tree Protection Fencing, and a condition is suggested to require the submission of a method statement to demonstrate how the works close to the trees are able to be carried out without impacting them or their root protection areas.
65. Policy D2 of the Thanet Local Plan requires that development proposals be well landscaped and maximise the nature conservation opportunities wherever possible. A condition requiring a detailed landscape scheme to be submitted is proposed, and this would ensure that the existing boundary treatment be supplemented and the remainder of the site adequately laid out to provide attractive school grounds with native species to encourage wildlife.

New 2 form entry primary school at land at St George's CofE Foundation School, Broadstairs – M/TH/15/0294 (KCC/TH/0122/2015)

Construction Methods

66. Given that there are neighbouring residential properties, if planning permission is granted it is considered appropriate to impose a condition restricting hours of construction to protect residential amenity (Monday to Friday between 0800 and 1800; Saturday 0900 to 1300; and no operations on Sundays or public holidays).
67. A condition requiring the submission of a full Construction Management Strategy, prior to commencement of development is considered appropriate, to include amongst other matters the details listed earlier in paragraph 35. A separate condition for each phase of the development would ensure an acceptable strategy can be agreed at the appropriate time.
68. In addition to the above, should permission be granted, a further condition to ensure that dust and mud are not deposited on the highway would also be considered appropriate, to minimise disruption to local residents.
69. One representation received raised the concern that piled foundations could affect neighbouring properties. The applicants have confirmed that the design does not include piled foundations.

Archaeology

70. The County Council's Archaeological Officer has advised that the site lies within an area of high potential associated with prehistoric and later activity. The focus of heritage interest is the possible surviving remnants of the 19th Century brickworks, and despite its demolition it is considered that remains associated with the brickworks may be present on site. The application was supported by the submission of a desk based assessment, carried out by Canterbury Archaeological Trust, which drew attention to the brickworks and their possible impact on archaeology and deposits generally.
71. In view of the potential for remains to be found, formal archaeological work would be considered appropriate should planning permission be granted, and a condition is proposed to secure archaeological field evaluation works and the preservation in situ of any important archaeological remains found, in accordance with a specification and timetable agreed by the County Council. Subject to this, the scheme would be in accordance with the aims of Policy HE11 of the Thanet Local Plan.

Renewable Energy

72. The NPPF places a presumption in favour of development that is sustainable and at the local level Thanet District Council planning policies support the incorporation of sustainability measures and the effective adoption and application of renewable energy technology. The Design and Access Statement (section 3.7) sets out a range of basic construction technologies that would be used in the building and a list of other features, such as solar control glazing to manage solar gain through sensitive elevations, space heating achieved by low temperature hot water underfloor heating and efficient HVAC systems (to name a few) which would be incorporated into the building. An additional document has been submitted setting out the energy hierarchy considerations taken into account when designing the building (which included the orientation of the layout to maximise daylight and reduce the need for electric lighting, to use natural ventilation where possible, having movement detected lights, etc.) and the statement confirms that

New 2 form entry primary school at land at St George's CofE Foundation School, Broadstairs – M/TH/15/0294 (KCC/TH/0122/2015)

the building design achieves a pass in the Simplified Building Energy Model (SBEM) energy calculation required under Building Regulations Part L 2013.

73. Although no renewable energy provision is required to meet the current regulations, some photovoltaic panels are proposed to be included on the roof (in recognition of the need to think about the future) and these could provide some additional renewable energy directly for the running of the school.

Conclusion

74. In my view the key determining factors for this proposal are the loss of school playing fields, the suitability of the highway network to accommodate the additional school traffic, the appropriateness of the proposed building design and site layout and the likelihood of adverse impacts on neighbouring residential amenity.
75. There is strong Government support in the NPPF for the development of new schools to ensure that there is sufficient provision to meet growing demand, increased choice and raised educational standards; subject to being satisfied on local amenity and all other material considerations, such as highway matters, design, noise, flooding and surface drainage. In my view the proposed development would not give rise to any significant and demonstrable harm in any of these respects, as far as planning, environmental and amenity aspects are concerned. It is argued that the loss of playing field land is not of overriding significance or harm in this instance, in terms of the overall aims of sustainable development.
76. It is considered that subject to the imposition of appropriate planning conditions, the proposal would not have any significantly detrimental effects on the local highway network, the amenities of local residents or the natural environment. In my view the development is sustainable and there are no material planning considerations that indicate that the conclusion should be made otherwise. However, I recommend that various conditions be placed on any planning permission, including those outlined below.

Recommendation

77. I RECOMMEND that the application BE REFERRED to the Secretary of State for Communities and Local Government and SUBJECT TO his decision, PERMISSION BE GRANTED, SUBJECT TO the imposition of conditions covering (amongst other matters) the following:

- 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 construction materials to be used externally;
- the submission of a School Travel Plan within 6 months of occupation of the new school and its ongoing review;
- hours of working during construction to be restricted to between the hours of 0800 and 1800 Monday to Friday and between the hours of 0900 and 1300 on Saturdays, with no operations on Sundays or Bank Holidays;
- the submission of a Construction Management Plan for both phases, providing details of how the site access would be managed, details of the methods and hours

New 2 form entry primary school at land at St George's CofE Foundation School, Broadstairs – M/TH/15/0294 (KCC/TH/0122/2015)

of working, location of site compounds and operative/visitor parking, details of site security and safety measures, lorry waiting and wheel washing facilities and details of any construction access;

- measures to be taken to prevent mud and debris being deposited on the public highway;
- the provision of the on-site parking areas prior to occupation of the school and their retention thereafter;
- the provision of cycle parking prior to the occupation of the school;
- the submission of a native species landscape scheme and details of a maintenance scheme for such landscaping, and the inclusion within this scheme of ecological enhancements and management of the retained earth bank and habitat areas;
- the submission of a method statement detailing how the construction can be carried out without affecting the trees and their root protection areas;
- the submission of a detailed lighting design strategy to be approved in writing prior to occupation of the school;
- no additional lighting to be erected at the site without the written consent of the County Planning Authority;
- the submission of a scheme and its approval in writing covering a preliminary risk assessment; a site investigation scheme; the results of the site investigation and details risk assessment and an appraisal and remediation strategy; and a verification plan providing details of data that will be collected;
- no occupation of the development until a verification report demonstrating the completion of the works set out in the remediation strategy has been approved
- if contamination found on site that was not previously identified, that development be stopped until a remediation strategy agreed and implemented;
- that piling or other foundation design using penetrative methods not be permitted without the express written consent of the County Planning Authority;
- no infiltration of surface water drainage into the ground be permitted other than with the express written permission of the County Planning Authority;
- the submission of a fully detailed sustainable surface water drainage scheme for the site and the written approval of such a scheme and its ongoing maintenance;
- the implementation of archaeological field evaluation work in accordance with a specification and written timetable to be approved by the County Planning Authority, and the preservation in situ of important archaeological remains;
- the submission of a biodiversity method statement providing details of measures that will be implement to minimise the potential for ecological impacts;
- the submission of a Construction Environmental Management Plan to ensure the retained areas of earth bank are protected during construction;
- within 3 months of the occupation of the school a community use agreement be submitted for approval in writing, for the shared use of the school sports facilities.

78. I FURTHER RECOMMEND that the following INFORMATIVES be added:

- The registering with Kent County Council of the School Travel Plan through the “Jambusters” website following the link <http://www.jambusterstpms.co.uk>;
- That the applicant ensures that all necessary highway approvals and consents are obtained.
- To ensure that works to trees are carried out outside of the breeding bird season and if this is not possible that an ecologist examine the site prior to works commencing

New 2 form entry primary school at land at St George's CofE
Foundation School, Broadstairs - M/TH/15/0294 (KCC/TH/0122/2015)

Case Officer: Helen Edwards

Tel. no: 03000 413366

Background Documents: see section heading