

## Demolition of existing main school building and construction of a replacement school building at Sevenoaks Primary School, Bradbourne Park Road, Sevenoaks – SE/16/141 (KCC/SE/0007/2016)

A report by Head of Planning Applications Group to Planning Applications Committee on 18 May 2016.

Application by Kent County Council, Property & Infrastructure Support and the Education Funding Agency for the demolition of the existing main school building and construction of a replacement school building at Sevenoaks Primary School, Bradbourne Park Road, Sevenoaks – SE/16/141 (KCC/SE/0007/2016).

Recommendation: permission be granted subject to conditions.

**Local Member:** Mrs Margaret Crabtree

**Classification:** Unrestricted

### Site

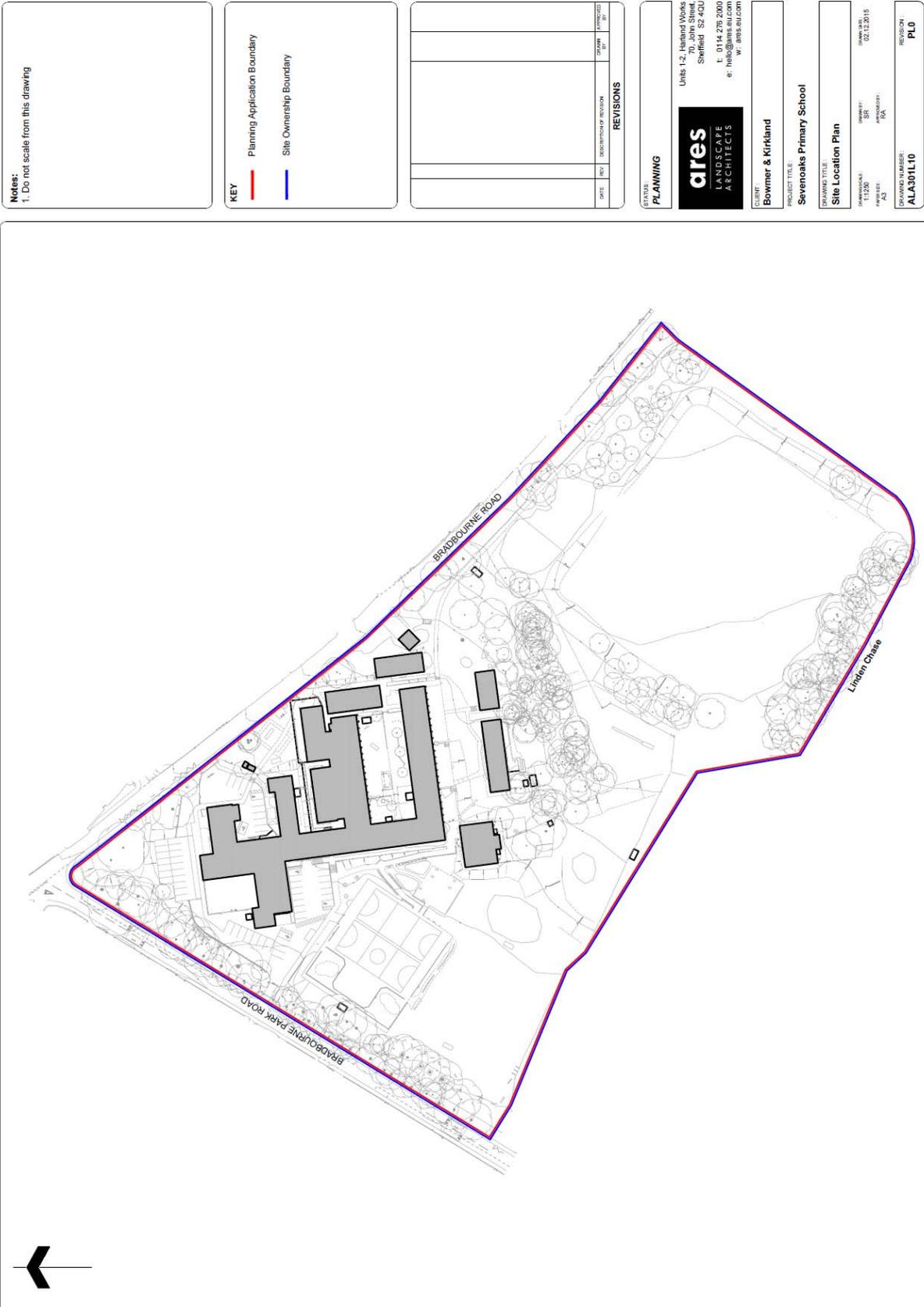
1. Sevenoaks Primary School is located approximately 1.5km (0.9 miles) to the north of Sevenoaks Town Centre, within the built confines of the town. The 4.48ha (11 acre) rectangular school site is accessed via Bradbourne Park Road and Bradbourne Road. In addition to the existing school buildings, which are located to the north of the site, the school site also hosts Bradbourne Park Pre School, Acorns Day Nursery and some County Council Adult Services facilities, all of which are located in modular buildings to the south of the main school building. The application site is bound by facing residential properties in Bradbourne Park Road to the north/north west, and those in Bradbourne Road to the north/north east. Beyond the south/south eastern boundary of the school site lies the County Council's Sevenoaks Adult Education Centre, and residential properties in Linden Close face the southern boundary. Walthamstow Hall Junior School (an independent school) is located to the south/south west of the application site, and is also accessed via Bradbourne Park Road.
2. Sevenoaks Primary School is a 3 form of entry (FE) school which could provide 630 places for 4-11 year olds, although there are currently only 529 pupils on the school roll. The existing school buildings, car parking and hard play areas are all located to the north of the site, with amenity grass space to the south west of the main building, and playing fields to the south/south east. The main school building was built in the mid 1950's and was originally constructed as a secondary school. The red brick part two and part single storey building consists of a long central corridor which spans several levels, and a series of 'off shoots' which contain the school's main teaching facilities. Between the 'off shoots' are areas of soft play and three new modular buildings (see planning history below).
3. The site is within the built confines of Sevenoaks and is therefore not affected by the Green Belt protection policies which are applicable to much of the Sevenoaks District. The application site is not located within or adjacent to a Conservation Area and there are no Listed Buildings nearby.

*A site location plan is attached.*



Replacement main school building at Sevenoaks Primary School, Bradbourne Park Road, Sevenoaks – SE/16/141 (KCC/SE/0007/2016)

Existing Site Plan



Replacement main school building at Sevenoaks Primary School, Bradbourne Park Road, Sevenoaks – SE/16/141 (KCC/SE/0007/2016)

Proposed Site Plan

**NOTES:**

- 1 Hard Play Retained
- 2 Existing Building Retained
- 3 Soft Internal Play
- 4 Entrance Space
- 5 Existing Car Parking & Drop Off Arrangement. Drive Spaces Retained
- 6 Proposed Proposed Entrance and Emergency Vehicle Access
- 7 Proposed Ramp Access With Central Fenceline
- 8 Existing Play Area & Equipment To Be Retained
- 9 Service Access
- 10 Proposed Games Court
- 11 Proposed Sub Station and Bin Store
- 12 New Covered Walkway Linking New School Building Design To Main Existing
- 13 Existing Sub Station
- 14 Bradbourne Road Entrance and Barrier Retained

**REVISIONS**

NO.	DATE	DESCRIPTION	BY	CHKD

**CONTRACTOR PROPOSALS**

Unit 1, 2, Sevenoaks  
 1, 0114 276 2000  
 # 1190000000  
 www.cires.co.uk

**cires**  
 ASSOCIATE  
 ARCHITECTS

**Bowmer & Kirkland**  
 CONSULTANT  
 Sevenoaks Primary School

**PROPOSED TITLE**  
 Sevenoaks Primary School

**PROPOSED DATE**  
 18/12/2016

**PROPOSED TIME**  
 10:00 AM

**PROPOSED BY**  
 ALAN1111

**PROPOSED FOR**  
 CDF



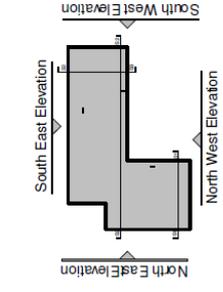
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Replacement main school building at Sevenoaks Primary School, Bradbourne Park Road, Sevenoaks – SE/16/141 (KCC/SE/007/2016)

Proposed Ground Floor Plan



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The document references the following files:  
 Reference Name: 000PE-XZ-1413-A-007  
 Status: 50  
 Revision: P01.1

By Department Legend

- Teaching (Orange)
- Large Spaces (Green)
- Learning Resource Areas (Yellow)
- Staff Offices (Purple)
- Storage (Grey)

Client: Bowmer & Kirkland  
 Architects: Consulting Engineers  
 Surveyors  
**PICK EVERARD**  
 Project: Sevenoaks Primary  
 Class Block

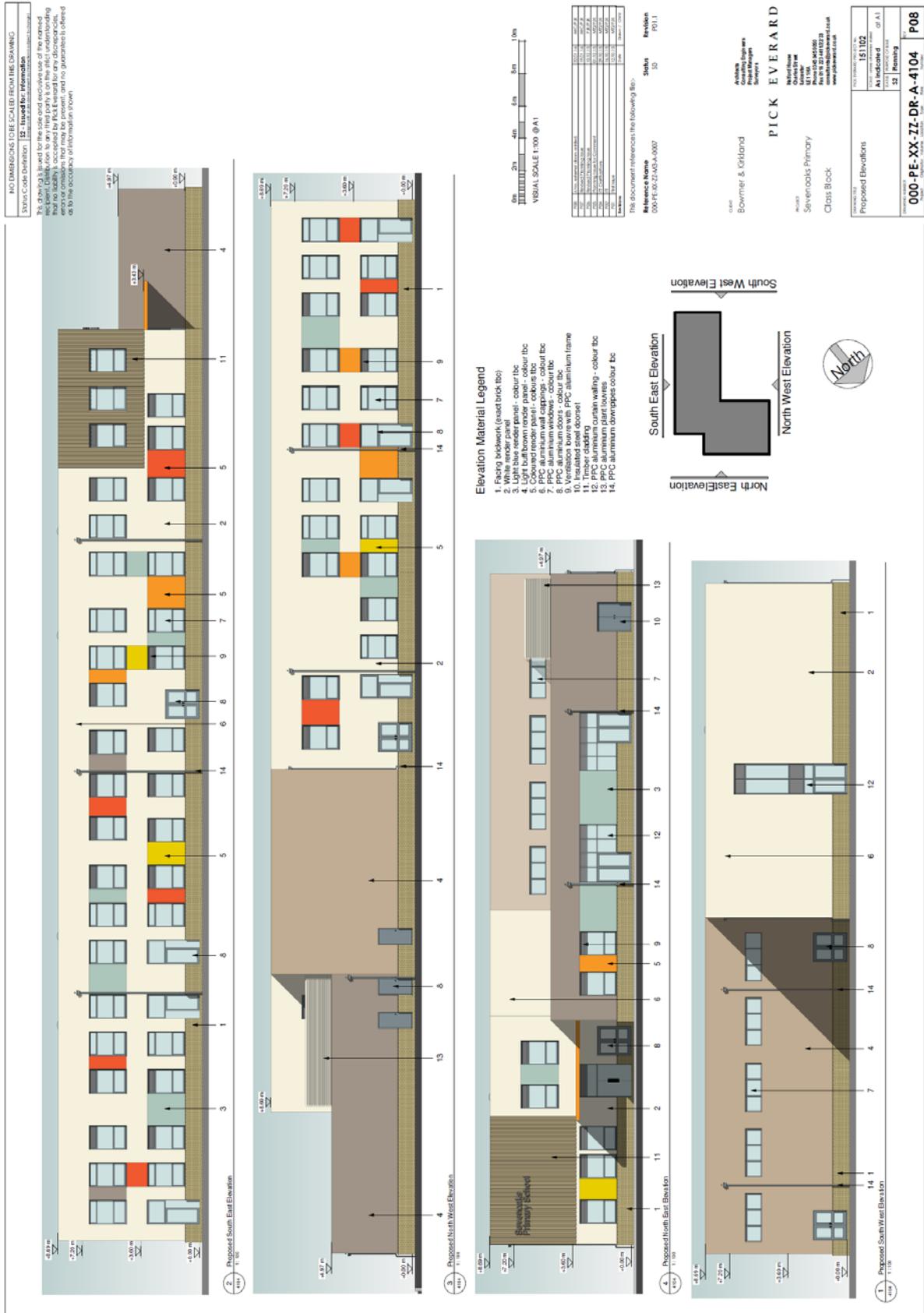
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PROJECT NO.	151102
DATE	As Indicated
SCALE	As Indicated
DATE OF ISSUE	12/11/2016
PROJECT LOCATION	SE/16/141
PROJECT REFERENCE	000-PE-XX-ZZ-DR-A-1201
PROJECT NO.	P08

1:100  
 VISUAL SCALE



Item D4  
**Replacement main school building at Sevenoaks Primary School, Bradbourne Park Road, Sevenoaks – SE/16/141 (KCC/SE/0007/2016)**

Proposed Elevations



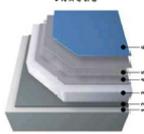
# Item D4

## Replacement main school building at Sevenoaks Primary School, Bradbourne Park Road, Sevenoaks – SE/16/141 (KCC/SE/0007/2016)

### Proposed Material Palette

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1. Includes  
 2. External performance requirements based on  
 3. Includes  
 4. Includes  
 5. Includes  
 6. Includes

Proposed Material Palette

Rev	Description	By	Check	Date
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003	Issue for information	...	...	...
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010	Issue for information	...	...	...

The document references the following file:  
**Reference Name:** 000-PE-XX-ZZ-A-4105  
**Status:** 30  
**Revision:** P01.1

**Author:** Bowmer & Kirkland  
**Architect:** Bowmer & Kirkland  
**Project Name:** Sevenoaks Primary School  
**Location:** Sevenoaks

**Manufacturer:** PICK EVERARD  
**Product Name:** Class Block  
**Product Code:** L21106  
**Product Description:** Class Block  
**Product Website:** www.pickandeverard.co.uk

Material Name	Material Code	Material Description
Light Finish Accent	...	...
Intermodal Powder Panel 1	...	...
Intermodal Powder Panel 2	...	...
Intermodal Powder Panel 3	...	...
Intermodal Powder Panel 4	...	...
Intermodal Powder Panel 5	...	...

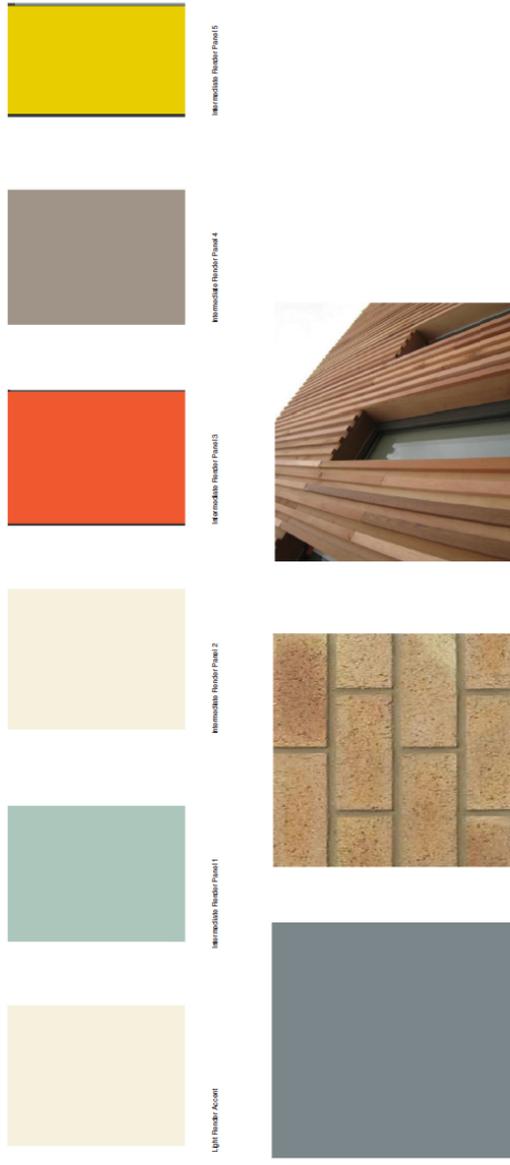
Proposed Material Palette



Sevenoaks Primary School

8.00m  
7.20m  
4.80m  
3.60m  
6.00m

Proposed Material Palette



Light Finish Accent

Intermodal Powder Panel 1

Intermodal Powder Panel 2

Intermodal Powder Panel 3

Intermodal Powder Panel 4

Intermodal Powder Panel 5

Timber Cladding

Dark Lower Block Brick Finish

Dark Lower Block Brick Finish

Dark Lower Block Brick Finish

## Replacement main school building at Sevenoaks Primary School, Bradbourne Park Road, Sevenoaks – SE/16/141 (KCC/SE/0007/2016)

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### Background/Relevant Planning History

4. Recent planning applications at Sevenoaks Primary School are as follows:

SE/11/966 – Placement of one modular building (*granted permission until 31 May 2016*).

SE/13/1498 – Placement of 2 modular buildings to accommodate an expansion from 2FE to 3FE, with associated covered walkway and landscaping works, provision of a replacement pedestrian side access gate, 13 additional parking bays and a drop-off/pick-up area within the school boundary (*granted permission with modular buildings to be removed by 31 July 2018*).

KCC/SE/0374/2015 – Permanent retention of 3 modular buildings (*withdrawn*)

SE/16/644 (KCC/SE/0033/2016) - Retention of 1 modular building (approved under consent reference SE/11/966 until 31 July 2018 (*granted permission with modular building to be removed by 31 July 2018*)).

5. As can be seen from the above, there are three modular buildings used by the school on the site, one which had permission until May 2016, and the remaining two which have permission until July 2018. The applicant recently submitted an application to retain all three modular buildings on a permanent basis. That application was subsequently withdrawn as it was premature to consider the merits of permanent retention in considering that the redevelopment of the site was proposed and yet to be considered (the subject of this paper). The applicant subsequently submitted a further application proposing the temporary retention of the one modular building whose permission expired in May 2016, proposing retention until July 2018. That application (SE/16/644 (KCC/SE/0033/2016)) was approved on the 1 April 2016 under delegated powers. All three modular buildings therefore have permission until 31 July 2018, at which time the applicant could consider its position and seek further retention should it be deemed necessary at that time. For the avoidance of doubt, the three modular buildings are not included within this application in that they are not proposed for removal but are shown as retained for the time being. However, their further retention, beyond 31 July 2018, would be proposed and considered via a future planning application should the applicant require that.

### Amendments

6. Following the submission of this application, the height of the proposed replacement school building was increased by approximately 1 metre due to changes in the proposed construction fabric of the building and the resultant change to the roof design. When originally submitted the scheme comprised a braced, structural steel framed building with precast concrete floor construction and a precast roof structure which had an inverted pitch, draining over a very shallow pitch towards the centre of the roof. The applicant advises that in order to provide an exemplar educational building to meet stringent environmental performance standards within tight budget constraints, it was necessary to amend the fabric of the building to increase energy efficiency.
7. A Structural Insulated Panel system (SIPs), which consists of an insulating foam core sandwiched between two structural facings, was considered to be the best option for not only energy efficiency, but build speed. However, in order to provide a water tight roof structure using SIPs a 5-degree roof pitch is required, with a traditional central ridge line. The roof design was therefore amended, and in order to ensure that the roof remained hidden behind the external parapet, the parapet height was increased as follows:

**Replacement main school building at Sevenoaks Primary School, Bradbourne Park Road, Sevenoaks – SE/16/141 (KCC/SE/0007/2016)**

Element	Previous Flat Roof Parapet Height (mm)	Proposed Pitched Roof Parapet Height (mm)	Difference (mm)
Studio / Dining	4086	4970	+884
Main Hall	7630	8692	+1062
Main Class Block	7630	8692	+1062

It is the amended proposal that will be discussed throughout this report.

### Proposal

8. This application has been submitted by Kent County Council Property and Infrastructure Support, in conjunction with the Education Funding Agency, and proposes the demolition of the main school building and the provision of a replacement purpose built one and two storey building with associated landscaping and infrastructure works. The proposal is not to provide additional accommodation on site (the school would remain 3FE), but to provide up-to-date teaching facilities to replace those on site which are considered by the applicant to be substandard and unsuitable for modern primary school teaching.
9. Following initial onsite appraisal and in considering the need to retain the existing building whilst constructing the replacement building and bearing in mind existing land uses on site (i.e. playing field) the applicant is proposing to construct the replacement school building to the south west of the existing school. This area of the school site is a plateau, at a higher level than the Bradbourne Park Road school frontage, but set behind a mature screening of trees and boundary planting. The area is currently used for outdoor play, and accommodates fenced playground space and amenity grassland.
10. The 'L' shaped building is proposed to be stepped in height, with the main two storey teaching block to the rear, running parallel with the site boundary with Bradbourne Park Road. The return of the 'L' is proposed to the north west of the building, and would accommodate a one and a half storey main hall and a single storey dining area and kitchen. An external play area is proposed to the south of this return, between the main classroom block and the treed boundary on Bradbourne Park Road.
11. Externally, the building would have a brickwork plinth, above which the building would be faced with white and buff synthetic render. Coloured render panels (see plan on page 8 of this report) would also be used to provide relief to the facades and highlight the low level hall and kitchen areas. Vertical timber cladding is proposed to the entrance area, stained in a light colour, to delineate the entrance of the building. Windows and doors are proposed to be powder coated aluminium, finished in dark grey.
12. The two storey classroom block would be 56.3metres (184ft) in length, and 8.7metres (28ft) in height, with the main hall and dining area section of the building measuring 29.9metres (98ft) in length and stepping down from 8.7metres (28ft) in height (main hall) to 4.9 metres (16ft) in height (dining area). The building would be sited approximately 17metres (56ft) from the site boundary with Bradbourne Park Road at the closest point (corner of main hall), with the classroom block approximately 36metres (118ft) from the boundary. Only 2 trees are proposed to be removed across the site, a Goat Willow and a Poplar, and both are recommended for removal for sound arboricultural management reasons. 8 trees would require pruning to accommodate the proposed development, but

## Replacement main school building at Sevenoaks Primary School, Bradbourne Park Road, Sevenoaks – SE/16/141 (KCC/SE/0007/2016)

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would be retained.

13. Upon completion of the proposed new building, the existing main school building would be demolished and the area landscaped to form soft informal play areas/amenity grassed spaces. Existing play areas and play equipment would be retained, and the main playing fields would remain as existing. A covered walkway is proposed to link the proposed new school building to the closest of the three existing modular buildings to be retained on site (permission expires in July 2018 (see paragraph 5 above)).
14. Under app reference SE/13/1498, which proposed the expansion of the school to 3 FE, 57 car parking spaces were approved, and an onsite drop off loop was to be provided using the entrance on Bradbourne Road and the exit on Bradbourne Park Road. I am advised by the applicant that only 53 of those 57 spaces were actually provided on site. Therefore, as part of this proposal, four car parking spaces would be provided within the existing car parking area to bring the total number of spaces on site to 57, in line with the previous planning consent. Apart from the provision of a new emergency vehicle only access to the east of the pedestrian access on Bradbourne Road, no other access changes/alterations are proposed as part of this application.
15. The applicant advises that the development has been designed in line with the 'Be Lean, Be Clean, Be Green' Energy Hierarchy, and to meet the exemplar standards for education buildings based on the Education Funding Agency (EFA) briefing document 'Facilities Output Specification'. The applicant further advises that the fabric first design strategy ensures that the construction budget is invested in reducing the energy consumption of the building, rather than focussing on 'expensive renewable energy technologies. The design philosophy would also provide a significantly better internal environment than previous education projects in terms of ventilation and comfort.

*The planning application is accompanied by a Design & Access Statement, Planning Statement, Transport Statement, School Travel Plan, Preliminary Ecological Appraisal, Protected Species Survey Report, Energy Statement, Tree Survey, Noise Assessment Report and Drainage & Floor Risk Assessment.*

### Planning Policy Context

- 16.(i) **National Planning Policies** – the most relevant National Planning Policies are set out in the National Planning Policy Framework (March 2012), which 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).

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

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

- achieving the requirement for high quality design and a good standard of amenity for

**Replacement main school building at Sevenoaks Primary School, Bradbourne Park Road, Sevenoaks – SE/16/141 (KCC/SE/0007/2016)**

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all existing and future occupants of land and buildings;

- minimising impacts on biodiversity, and protecting and enhancing valued landscapes, contributing to the Government's commitment to halt the overall decline in biodiversity;
- promoting sustainable transport;

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

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

**(ii) Development Plan Policies**

**Sevenoaks District Local Plan: Adopted 2000:**

**Policy EN1 -** Proposals for all forms of development and land use must comply with the policies set out in this Plan, unless there are overriding material considerations. Scale, height, design, layout, retention of important features (such as trees), residential and local amenity, access and parking are just some of the criteria which should be considered in the determination of a planning application.

**Policy EN4A -** Proposals for all forms of non-residential development must make satisfactory provision for the safe and easy access of those with disabilities.

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

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

**Sevenoaks District Core Strategy: Adopted February 2011:**

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

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

**Policy SP1 –** Requires all new development to be designed to a high standard, reflect the distinctive local character of an area, create safe, inclusive and

## Replacement main school building at Sevenoaks Primary School, Bradbourne Park Road, Sevenoaks – SE/16/141 (KCC/SE/0007/2016)

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attractive environments, incorporate sustainable development principles and maintain biodiversity. Account should be taken of guidance adopted by the District Council in the form of Conservation Area Appraisals and Parish Plans, amongst other matters. The District's heritage assets and their settings, including listed buildings, conservation areas, historic buildings, archaeological remains, landscapes and outstanding views will be protected and enhanced.

**Policy SP2 -** Sets standards for sustainable design and construction. Institutional development will be required to achieve a BREEAM rating of at least 'very good'.

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

### Consultations

17. **Sevenoaks District Council** raises no objection to the application provided Kent Highways & Transportation find the submitted details acceptable, ecological matters are adequately assessed, and that conditions are imposed regarding sympathetic screening of the site and screening of any wooden buildings to be retained.

**Sevenoaks Town Council** recommends refusal of the application as the Town Council is of the view that the application does not seek to address the long term (15-20 year) demand for Primary School places in Sevenoaks. In addition, the Town Council notes that the submitted traffic survey was undertaken on a day when two local schools were closed, and request that the survey be repeated at peak hours on a date when all schools in the surrounding area are open.

**Kent County Council Highways and Transportation** raises no objection to the application. However, it is advised that parking bay 28 should not be marked as a disabled space as it would block car parking spaces 26 & 27.

**Environment Agency** raises no objection to the application subject to conditions regarding ceasing work should previously unidentified land contamination be found, and the control of surface water drainage and infiltration into the ground (there should be no discharge to ground within a Source Protection Zone 1 [*the site is within a Source Protection Zone 1*] unless the discharge is clean and uncontaminated i.e. roof water). Further informatives are requested regarding drainage and waste.

**Sport England** considers that the proposal would not have any impact on existing playing field and therefore have no comments to make.

**The County Council's Biodiversity Officer** has no objection to the application subject to conditions requiring the submission of the results of an additional bat emergence survey prior to demolition, the submission of an updated badger survey and any required mitigation prior to the commencement of the development, and the submission of a Biodiversity Management Plan (ecological enhancements for the site). In addition, informatives are requested to advise the applicant that any external lighting on site should adhere to the Bat Conservation Trust's Guidance, and that the Construction Management Plan should include measures to protect land suitable for reptile habitat within the site.

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**The County Council's Flood Risk Team (SuDs)** raises no objection to the application subject to the imposition of conditions requiring the submission of a detailed sustainable surface water drainage scheme and the submission of details of the implementation, maintenance and management of the sustainable surface water drainage scheme. A further condition is required to control surface water drainage into the ground.

**The County Council's School Travel Plan Advisor** considers that the submitted Travel Plan is very well written and informative but, as it was produced in 2014, needs to be updated. Therefore, should permission be granted, an updated Travel Plan should be required pursuant to condition.

### Local Member

18. The County Council Local Member, Mrs Margaret Crabtree, was notified of the application on the 19 January 2016, and further notified of the amended details on the 15 February 2016. The following comments have been received:

"I have no objection to the proposal to demolish the existing building and construct a replacement school building but would ask Highways to look at the parking and traffic issues that residents have raised."

### Representations

19. The application was publicised by advertisement in a local newspaper, the posting of 3 site notices around the application site and the individual notification of 65 nearby properties. Those who made written representations on the original submission were further notified of the amended details.
20. At the time of writing this report, 6 letters of objection have been received (from two local residents), in addition to a representation from St John's Residents' Association (see below) and representations querying procedural matters such as site notice and neighbour notification dates. The main points of concern and objection are summarised as follows:-

#### Site Layout/Design

- The building should be moved further south to avoid damage to existing trees and to reduce the visual impact of the building;
- The new building would make little or no statement located behind the trees along Bradbourne Park Road;
- The building design is not in keeping with the rest of the buildings in the locality;
- An increase in height of a metre is not a slight increase;
- The site would become a unattractive combination of illogically laid out raised car parking areas wrapped around the footprint of the building to be demolished, with randomly sited and unrelated temporary buildings retained;
- The car parking siting should be amended to reflect the new site layout not retained as is;
- Opportunity is being missed to address the haphazard layout and untidiness of the site;
- The site layout should be completely redesigned to provide clearly zoned areas;
- Existing wire link fencing surrounding the site is unattractive and should be screened by planting;
- The retention of the 3 modular buildings would be visually unsatisfactory;
- The 3 modular buildings should be removed and replacement permanent

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- accommodation provided within the new building;
- The covered walkway across the site should not receive permission until the future retention of the 3 modular buildings is determined;
- The proposed playground would be under the tree canopy which may not be desirable from the safety perspective;
- The proposed playground would be in shade due to the increased building height and trees;
- Widespread vegetative screening is required;

### Amenity Concerns

- Security lighting at the school and headlights within the elevated car park are an existing nuisance to local residents;
- The new building should not have any security lighting on the elevation facing Bradbourne Park Road;
- The kitchen extraction unit should be entirely hidden by the increased parapet height, and tests validating the applicants' assertion that there would be no noise/odour pollution re-done and independently reviewed;

### Flooding

- There is regular flooding at the junction of Bradbourne Road and Bradbourne Park Road, and further along at the St John's and St James' road junction area there has been flooding including sewage in gardens as a result of existing drainage problems. This suggests that local drainage capacity is limited;
- Soakaways should be used on site rather than reliance on the local drainage system;
- What confidence can residents have that they will be protected from the risk of flooding should the applicant not have assessed the situation correctly or should the proposed drainage system fail?

### Access and Highway Matters

- The existing drop off area is closed to all but staff;
- Delivery vehicles park in local roads rather than attempt to access the site;
- An onsite pick up/drop off facility should be provided, perhaps between the new building and the boundary of Bradbourne Park Road;

### Construction

- How would construction traffic be managed? An additional construction access would not be feasible;
- The applicant should be required to put out to consultation its plans for parking/traffic during and after the rebuild.

### Other

- The 3 modular buildings are clearly included within the site plans and the new building would be linked to them by a covered walkway. There is a clear intention to retain the modular buildings and, therefore, their retention should be considered as part of this application;

St John's Residents' Association, which represents residents living in homes surrounding Sevenoaks Primary School, comments as follows:

“We warmly welcome the provision of more educational facilities for the area but wish to express a few reservations about some of the details currently under consideration:

- Despite the great advances which the School has made in traffic management

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on and around the site, which are described in its Travel Plan, local residents are unable to agree with the traffic consultants' conclusion that there is not a problem. The drive-through scheme currently in operation to alleviate the congestion associated with pupil drop-off and collection times does not work and has effectively fallen into disuse. We believe much more effort should be put into finding possible solutions before the placing of planned new buildings and auxiliary areas is finalised. For example, if the new school were to be built slightly further to the south, a relief service road could pass between it and Bradbourne Park Road.

- At an appropriate later date we would expect to be consulted over the access of heavy plant traffic to the site during both the demolition and construction phases of the project.
- We are also concerned about the site perimeter, currently defined on the Bradbourne Rd and Bradbourne Park Rd sides by a mixture of chain link and close-boarded fences. The fence deprives local residents of what used to be a grand vista across open space, and creates an impression that the school wishes to cut itself off from the local community. We suggest that the entire boundary should instead be a living barrier, perhaps a 2m hedge of beech and/or hawthorn, with an integral chain link fence if it is felt that the thorns of the latter are an insufficient deterrent for any would-be intruders.
- Regarding the future of mobile classrooms on the site, any wooden buildings left after the demolition of the present school would be obtrusively visible to the public and should also be attractively screened.

We look forward to having a new school building within the community and hope that these comments can be taken into consideration.”

## Discussion

### Introduction

21. In considering this proposal regard must be had to the Development Plan Policies outlined in paragraph 12 above. Section 38(6) of the 2004 Planning and Compulsory Purchase Act states that applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. Therefore, this proposal needs to be considered in the context of the Development Plan Policies, Government Guidance, including the new National Planning Policy Framework (NPPF), and other material planning considerations arising from consultation and publicity. Issues of particular relevance include design and site layout considerations, parking and access, landscaping and ecology, and general residential amenity matters.

### Siting and Design

22. As outlined in paragraphs 9 to 13 of this report, this application proposes the demolition of the existing main school building and the provision of a purpose built one and two storey replacement school building. In considering the need to retain the existing building whilst constructing the replacement building, and bearing in mind existing land uses across the site (i.e. playing field), the applicant is proposing to construct the replacement school building to the south west of the existing school. This area of the school site is a plateau, at a higher level than the Bradbourne Park Road school frontage, but set behind a mature screening of trees and boundary planting. The area is currently used for outdoor play, and accommodates fenced playground space and amenity grassland.
23. Before assessing and discussing the design of the proposed building, it is necessary to

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consider the implications of the proposed site layout. Local residents consider that the site would have illogically laid out car parking areas wrapped around the footprint of the building to be demolished, with randomly sited and unrelated temporary buildings. It is suggested that the car parking layout should be amended to reflect the new site layout, and further that the whole site layout should be completely redesigned.

24. First, it is important to note that this application is proposing to replace the existing main school building as the accommodation it provides is no longer fit for purpose and does not provide the accommodation required for modern teaching practices. However, the replacement building needs to be constructed whilst the existing school remains in operation. This obviously limits development opportunities for the site, but the cost implications of a full decant into modular accommodation for the duration of the works would render the scheme unviable. Moreover, the siting of the replacement building is, in my view, logical and acceptable in planning terms. The new building would be well screened by existing mature boundary planting, and would relate well to existing accesses and ancillary facilities on the site. Alternative locations for the new building within the school site would also have resulted in a loss of playing field, which undoubtedly would have met with objection from Sport England. The existing hard play areas to be lost as a result of the proposed siting of the new building would be replaced as part of the proposal, and additional grassed amenity areas would be provided upon demolition of the existing school building. It is suggested that the replacement hard play area would be in the shade and under the tree canopy, but the trees would be managed to avoid any overhanging branches (see Landscaping section below) and shade is required when children are at play. Other alternative amenity areas within the school site would be in full sunlight if required. I therefore consider the siting of the replacement building and hard play to be acceptable, and further consider a complete redesign of the site to be impracticable in the current restricted funding climate.
25. With regard to the car parking layout, this is to remain as existing. Although access and highway matters will be discussed below, it is important to note that this proposal is to provide replacement accommodation for existing staff and pupils and not to provide additional accommodation to facilitate an expansion. The school was expanded to 3 Form on Entry (3FE) under application reference SE/13/1498 and that application also provided additional onsite car parking and an onsite drop-off facility. As outlined in paragraph 14 of this report, 57 car parking spaces in total were approved under consent reference SE/13/1498, but only 53 have been marked out on site. As part of this proposal, 4 spaces will be provided within the existing car parking area to bring the amount of spaces on site up to 57, in line with the previous planning permission. No other access or parking changes are proposed and, as this application would not result in additional staff and pupils, Kent County Council Highways and Transportation is satisfied that no additional car parking and/or access changes are required. There is no justification therefore to require the car parking area to be re-designed or amended as part of this proposal. In addition, following demolition of the existing main school building, the car parking and access arrangements would continue to relate to the replacement building and work operational for the school. I therefore consider the retention of the existing siting of the car parking to be acceptable, although its later re-configuration at some future date would still be possible.
26. It is further suggested by a local resident that the modular buildings on the site should be removed and permanent accommodation provided as part of this proposal. First, as outlined in paragraph 1 of this report, 3 of the 6 modular buildings on site are not used by the Primary School and are in use by the separate Bradbourne Park Pre-School, Acorns Day Nursery and Kent County Council Adult Services. Those 3 modular buildings are therefore not within the remit of this application. However, the remaining 3

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modular buildings (see paragraph 5) are used by the School for teaching accommodation, and all 3 have temporary permission until 31 July 2018.

27. The 3 modular buildings are shown as retained within the application documentation, and a covered walkway is proposed to link the replacement school building to them, but their future retention beyond July 2018 is not currently proposed. The applicant advises that they have not included the retention of the modular buildings within this application as those particular buildings have been determined under separate planning consents. Further, the modular buildings are subject to separate funding streams within the County Council, whereas the proposed new building development would be funded directly by the Department for Education via the Education Funding Agency and delivered in partnership with the County Council as Education Authority. The applicant for future retention of the modular classrooms would therefore be different. Should the County Council (or the School) wish to retain the modular buildings beyond July 2018, a separate planning application would be required and the merits of their retention considered at that time.
28. However, as a redevelopment of a school site it would normally be expected that temporary accommodation would be replaced by permanent accommodation and subsequently removed. In this case however, the applicant advises that in 2013 the County Council invested a significant sum of money to expand the Sevenoaks Primary School, which included the construction of the modular buildings and access and car parking improvements. These modular buildings are in excellent condition and the accommodation they provide is more than suitable for modern teaching methods.
29. As already mentioned, this application has been submitted as part of the Government's Priority Schools Building Programme, which specifically addresses the need to replace school buildings in poor condition rather than school expansions. The modular buildings, being only 3 years old, are not in poor condition and therefore do not fall within the remit of the Priority Schools Building Programme. Further, the applicant advises that there are good education reasons for leaving the modular buildings on site as the surroundings of a 3FE Primary School can be quite daunting for pupils in Early Year's classes. The modular buildings, used as Early Year's classrooms, provide a stepping stone into the main school building and a gentle transition into Year 2 and above. In considering above, I am satisfied with the justification provided for not replacing the temporary accommodation at this time and see no reason to refuse the application on this ground.
30. However, Sevenoaks District Council and St John's Residents' Association consider that the modular buildings should be screened if they are to be retained. As detailed above, the retention of the modular buildings is not proposed as part of this application, and I therefore consider that requiring screening now would be premature and retention beyond July 2018 may not be required or be acceptable in planning terms. The applicant has advised that any future application to retain the modular buildings beyond July 2018 would include screening and, in addition, would propose an upgrade of the elevations to accord with those of the replacement main building (should permission be granted). I consider this approach to be logical and acceptable, and as a result do not consider that screening of the temporary buildings is necessary as part of this application especially in considering that their retention does not form part of this application.
31. Having accepted the site layout as proposed, including the siting of the replacement building, the design of the building now needs to be considered and discussed. It is suggested that the design of the building would not be in keeping with the rest of the buildings in the locality, although it is also stated that the building would make little

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statement located behind the trees on Bradbourne Park Road. First, with regard to the massing of the building, the 'L' shaped building is proposed to be stepped in height, with the main two storey teaching block to the rear, running parallel with the site boundary with Bradbourne Park Road. The return of the 'L' is proposed to the north west of the building, and would accommodate a one and a half storey main hall and a single storey dining area and kitchen. The two storey classroom block would be 56.3metres in length, and 8.7metres in height, with the main hall and dining area section of the building measuring 29.9metres in length and stepping down from 8.7metres in height (main hall) to 4.9 metres in height (dining area). The building would be sited approximately 17metres from the site boundary with Bradbourne Park Road at the closest point (corner of main hall), with the classroom block approximately 36metres from the boundary. Facing properties in Bradbourne Park Road are set back from the road by large driveways/front gardens, meaning that the degree of separation between closest residential properties and the proposed building is significant. There is also a significant belt of existing tree planting and vegetation along the school site boundary, which would be retained. I therefore consider that the massing of the building would have little impact on the amenity of local residents, and although the building would be visible, it would not be overbearing in nature or unduly obtrusive.

32. Externally, the building would have a brick work plinth, above which the building would be faced with white and buff synthetic render. Coloured render panels would also be used to provide relief to the facades and highlight the low level hall and kitchen areas. In addition, vertical timber cladding is proposed to the entrance area, stained in a light colour, to delineate the entrance of the building. The proposed building is an educational establishment so would not be expected to replicate the materials palette of local residential dwellings. In my view, the design of the proposed building would be a significant improvement over the dated and bland existing brick built building, and would offer a considerably improved educational environment for the pupils. Although the modern design solution would be well screened by existing tree planting and vegetation, it would be visible from the street scene complementing the existing architecture of the area. Although indicative details of external materials have been provided, I consider that further details should be provided pursuant to condition, should permission be granted. Subject to that condition, I consider the design of the proposed building to be more than acceptable in this locality.
33. It is suggested by a local resident that the covered walkway, which is proposed to link the new main school building to the 3 modular buildings, should not be approved until the future retention of the 3 modular buildings is determined (in 2018). However, the covered walkway would be required upon completion of the new building/demolition of the existing building to link the modular buildings to the main school. I am of the view, however, that the covered walkway is essentially temporary in nature, in that it could be removed at a later date if needs be. I also consider that the walkway would not be unduly intrusive, and that its provision would not have a significantly detrimental effect on the character and appearance of the school site. I therefore see no reason to refuse its provision at this stage.
34. Lastly, concern is expressed regarding the existing wire link and timber fencing that surrounds the site, which is considered to be unattractive. St John's Residents' Association further considers that the fence deprives local residents of a vista across the site and gives the impression that the School wishes to distance itself from the local community. It is suggested that the entire boundary should instead be a '2metre high hedge of beech and or/hawthorn'. However, in my view, a solid hedge screening would further reduce views into and across the site, and would further close the school off from the local community. Moreover, the use of hedging alone would not provide the

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necessary site security required by current standards. The existing fencing is fit for purpose and is not unduly visually intrusive and I see no reason to require the treatment of the boundary of the site to be changed, especially in considering that it is unaffected by the proposals. Although the District Council wishes to see conditions imposed regarding sympathetic screening of the site, I consider that the site is sufficiently well screened as existing by boundary planting and trees. However, a scheme of landscaping would be required pursuant to condition to soften the development and reinstate areas affected by demolition, and this will be discussed later in this report.

Parking and Access

35. Local residents have expressed concern regarding this application on the grounds that the existing drop-off area is closed to all but staff, and delivery vehicles park in local roads rather than attempt to access the site. Further, St John's Residents' Association states that, despite the great advances which the School has made in traffic management, local residents are unable to agree with the traffic consultants' conclusion that there is not a problem. The Residents' Association believe that much more effort should be put into finding possible solutions - for example if the new school were to be built slightly further to the south, a relief service road could pass between it and Bradbourne Park Road.
36. First, it should be noted that this application is proposing to replace existing substandard accommodation on site, and is not proposing an increase in staff or pupils numbers. The expansion of the school to 3FE was considered and addressed under application reference SE/13/1498, which proposed a total of 57 car parking spaces onsite and the provision of an on-site pick-up/drop-off facility. I am advised by the applicant that only 53 of those 57 spaces were actually provided on site. Therefore, as part of this proposal, four car parking spaces would be provided within the existing car parking area to bring the total number of spaces on site to 57, in line with the previous planning consent. In addition, the applicant has provided written assurance that the pick-up/drop-off facility would be reopened and managed by the school.
37. Secondly, the suggested provision of a 'relief road' to the south of the proposed building would have little justification given that staff and pupil numbers are not proposed to increase, and moreover such a road would require removal of trees to create a new site access, and would require the new building to be moved further south, impacting upon an existing playground to be retained. I see no requirement for such a facility, especially in considering that the existing onsite pick-up/drop-off is to be reinstated as part of this application.
38. This application was accompanied by a Transport Statement, and the highway and access implications of the application have been considered and addressed in detail by Kent County Council Highways and Transportation, who raise no objection to the development subject to the provision of 4 car parking spaces to bring the amount of parking on site in line with that approved in 2013 (57 spaces) and the reopening and retention of the pick-up/drop-off facility. It is noted, however, that parking bay 28 should not be marked as disabled as it would block bays 26 & 27 and I consider that, should permission be granted, an informative should advise the applicant of this. It should also be noted that the Transport Statement was amended and resubmitted in the determination of this application to address the concerns of Sevenoaks Town Council in that the first Statement was prepared using survey work undertaken on a day when another local school was closed.
39. The County Council's School Travel Plan Advisor considers that the submitted Travel

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Plan is very well written and informative but, as it was produced in 2014, needs to be updated. Therefore, should permission be granted, an updated Travel Plan should be required pursuant to condition. In considering the above, and in light of the views of the Highway Authority, I consider that subject to the imposition of conditions regarding the submission of an updated Travel Plan prior to occupation of the development, and the provision and permanent retention of the additional 4 car parking spaces and the re-opening and ongoing provision of the existing onsite pick-up/drop-off facility, that the development would not have a detrimental impact on the local highway network. I therefore see no justification to refuse this application on highway and parking grounds.

Landscaping and Ecology

40. Two trees are proposed to be removed across the site, a Goat Willow and a Poplar, and both are recommended for removal for sound arboricultural management reasons. 8 trees along the Bradbourne park Road site frontage would require pruning to accommodate the proposed development, but would be retained. It is suggested that the proposed building be moved further into the site to negate the need for tree works, but such a move would affect existing playground proposed to retention, in addition to existing vegetation to the south of the proposed building. In considering the limited tree works proposed, and bearing in mind the significant amount of tree planting and screening along the Bradbourne Park Road site frontage, I do not consider that the proposal would have a significantly detrimental impact on the existing trees on site. However, should planning permission be granted conditions of consent should be imposed requiring the erection of tree protection fencing prior to commencement of the development to ensure that existing trees would be adequately protected, and the submission of a detailed scheme of landscaping and tree planting to not only require the provision of amenity planting in close proximity to the proposed building, but detail how the site would be reinstated following demolition of the existing school building. In addition, a further condition of consent would ensure that there is no tree removal during the bird breeding season, unless supervised by a suitably qualified ecologist.
41. This application was accompanied by a Preliminary Ecological Appraisal and a Protected Species Survey Report. Following assessment of these documents, the County Council's Biodiversity Officer has no objection to the application subject to the imposition of conditions requiring the submission of the results of an additional bat emergence survey prior to demolition, the submission of an updated badger survey and any required mitigation prior to the commencement of the development, and the submission of a Biodiversity Management Plan (ecological enhancements for the site). In addition, informatives are requested to advise the applicant that any external lighting on site should adhere to the Bat Conservation Trust's Guidance, and that the Construction Management Plan should include measures to protect land suitable for reptile habitat within the site. Subject to the imposition of the conditions and informatives outlined above, I am satisfied that the proposed development would not have a detrimental impact on protected species and/or their habitat.

Drainage, Flooding and Land Contamination

42. The Environment Agency and the County Council's Flood Risk Team (SuDs) both raise no objection to this application subject to the imposition of conditions. The Flood Risk Team require the submission of a detailed Sustainable Surface Water Drainage Scheme and the further submission of details of the implementation, maintenance and management of the sustainable drainage scheme. Both the Flood Risk Team and the Environment Agency require a further condition to control surface water drainage into the ground (there should be no discharge to ground within a Source Protection Zone

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*[the site is within a Source Protection Zone 1]* unless the discharge is clean and uncontaminated i.e. roof water). Further informatives are also requested regarding drainage and waste. Should permission be granted, the conditions as outlined above would be imposed upon the consent, and I am satisfied that such conditions would ensure that drainage of the site was both sustainable and effective.

43. However, a local resident considers that soakaways should be used on site as the local drainage system is at capacity, demonstrated by localised flooding. It should first be noted that the site is not expanding in size, so the impact on the drainage system should be no greater than existing. In addition, the County Council's Flood Risk Team have commented on this specific concern and advise as follows:

“I have covered the possibility of infiltration losses within my consultation response and recommend this is taken into account within the detailed design (to be submitted). I noted some misconnections to the foul drainage system are resolved with this strategy and now are directed into the new controlled surface water system which provides benefit both on and off the site. I have recommended conditions for the drainage details and as such, any permission would still require these conditions to be discharged to the satisfaction of the planning authority. This would be in liaison with consultees, including Thames Water.

The Bradbourne Road/Bradbourne Park Road appear to be vulnerable to surface water flooding due to the topography of the area and hence surface water becomes trapped within the highway or uses the highway as a flow route. During heavy rainfall this may exceed the capacity of the highway drainage. Any particular concerns for highway drainage, such as for blocked or poorly performing drains, should be reported to KCC highways in the first instance.”

44. In considering the advice provided above and the fact that a detailed Sustainable Surface Water Drainage Scheme would be required pursuant to condition, I am more than satisfied that the development would improve the current onsite drainage scenario. Offsite flooding issues that are not directly affected by the proposal, such as surface water flooding on local roads, cannot be expected to be resolved as a result of this application and would need to be addressed separately.
45. With regard to land contamination, the Environment Agency requests a condition be attached to any consent regarding how works should proceed should any contamination be found during construction. Therefore, should permission be granted, a condition would be imposed covering this matter.

Amenity Concerns

46. Local residents express concern that existing security lighting at the school and headlights within the car park are a nuisance to local residents. As the car parking is not affected by these proposals, there is little that the Planning Authority can do to alleviate that concern. With regard to security lighting, the existing lighting cannot be controlled as part of this application, but the demolition of the main school building upon completion of the new building would remove lighting of that building from the site. It is suggested by a resident that the new building should not have any security lighting on the elevation facing Bradbourne Park Road. However, this may cause security concerns for the school and I would not wish to impose such a restriction upon them. Facing residential properties are separated from the proposed building by existing tree planting and boundary vegetation and Bradbourne Park Road, and are further set back from the

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road due to front gardens and driveways. Should lighting on the elevation facing Bradbourne Park Road be required it may, therefore, be acceptable in amenity terms. However, as no details regarding external lighting of the building have been submitted, I consider that details should be required pursuant to condition should permission be granted. That would enable further assessment, and would protect the amenities of local residents whilst allowing the building to be lit as appropriate for security purposes

47. It is also requested by a local resident that the kitchen extraction unit should be entirely hidden by the roof parapet, and that tests validating the assertion that there would be no noise/odour pollution redone and independently reviewed. However, I am satisfied that the kitchen extraction unit (and other roof plant) would be a significant distance from facing properties in Bradbourne Park Road, and further screened from view by existing boundary planting and vegetation. Kitchen/roof plant would also be contained within a screened plant enclosure. In addition, the onerous requirements of Building Regulations would need to be met with regard to noise and odour issues, and it should be noted that a school kitchen is only in use for limited hours of the school day. I am satisfied that no further details are required with regard to kitchen extraction, and that its location on the school building would not unduly affect the amenity of local residents.

#### Sustainability

48. As outlined in paragraph 15 of this report, the development has been designed in line with the 'Be Lean, Be Clean, Be Green' Energy Hierarchy, and to meet the exemplar standards for education buildings based on the Education Funding Agency (EFA) briefing document 'Facilities Output Specification'. The applicant further advises that the fabric first design strategy ensures that the construction budget is invested in reducing the energy consumption of the building, rather than focussing on 'expensive renewable energy technologies. The design philosophy would also provide a significantly better internal environment than previous education projects in terms of thermal insulation, ventilation, natural light and overall comfort.
49. In addition, the building design would meet, and exceed, the energy calculations required under Building Regulations Part L 2013. Although roof mounted solar PVs are not proposed in this instance, the proposals were designed from the ground up with efficiency and building sustainability in mind. As such, the applicants early building modelling indicated that external renewables were not necessary to augment the design, as the building would exceed energy emissions criteria by approximately 10% compared with the notional building criteria. It is also important to note that the absence of such technology does not mean that the proposed building would be of low energy efficiency and high grid energy use. Moreover, the proposed roof design does not preclude the provision of PV panels at a future date when available funding allows. In considering the sustainable design credentials of the proposed building, I am of the opinion that the building design is sustainable and that the provision of further renewable technologies is not necessary in this particular instance.

#### Other matters

50. Sevenoaks Town Council recommend refusal of this application as the Town Council are of the view that the application does not seek to address the long term (15-20year) demand for Primary School places in Sevenoaks. However, Sevenoaks Primary School was expanded by one form of entry in 2013 to meet future demand. This application is proposing the provide purpose built accommodation to replace the existing substandard accommodation on site. Should the further expansion of Primary Schools in Sevenoaks be needed in the future (over and above the numerous expansions that have already

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been granted permission) then applications for additional accommodation would be submitted and considered as appropriate. In my view, this application is proposing to replace existing substandard accommodation which should be encouraged, and a lack of provision for additional spaces (which may or may not be needed in the future) should not be a reason to refuse the application.

### Construction Matters

51. Concern has been expressed regarding disruption resulting from the construction of the development, mainly as a result of construction traffic. Unfortunately, construction and demolition activities can be disruptive, and there is a potential for noise and other nuisance during the course of the development. However, this is not a reason to refuse a development. Instead, controls should be applied to minimise the disruption and to protect as far as practicably possible the amenity of local residents. If planning permission is granted it would, in my view, be appropriate to impose a condition restricting hours of construction in order to protect residential amenity. I would suggest that works should be undertaken only between the hours of 0800 and 1800 Monday to Friday and between the hours of 0900 and 1300 on Saturdays, with no operations on Sundays and Bank Holidays. It is also normal on school sites for contractors to be required under the terms of their contract to manage construction traffic/deliveries to minimise conflict with traffic and pedestrians at the beginning and end of the school day.
52. In addition, to address concerns raised by St John's Residents' Association and local residents regarding management and routing of construction traffic, I also consider it appropriate that details of a full Construction Management Strategy be submitted for approval prior to the commencement of development. A draft document has been submitted with the application, but this should be amended to include details of the methods and hours of working (as specified above), location of site compounds and operative/visitors parking, details of site security and safety measures, lorry routing, waiting and wheel cleaning facilities, details of how the site access would be managed to avoid peak school times, and details of any construction accesses. Therefore, should permission be granted, a Construction Management Strategy would be required pursuant to condition and the development would thereafter have to be undertaken in accordance with the approved strategy.
53. In addition to the above, should permission be granted, conditions of consent would ensure that dust, mud on the local highway network, and other matters associated with construction, would be mitigated as far as reasonably possible so as to minimise disruption to local residents.

### **Conclusion**

54. In my view, the development would not give rise to any significant material harm and is in accordance with the general aims and objectives of the relevant Development Plan Policies. The development is in accordance with the principles of the National Planning Policy Framework and the Planning Policy Statement for Schools (2011). Subject to the imposition of the conditions outlined throughout this report, I consider that the proposed development would not have a significantly detrimental impact on the character and appearance of the local area, the local highway network or the amenity of local residents, and would accord with the principles of sustainable development as set out in the NPPF. In particular, it needs to be borne in mind that the application relates to improving the existing teaching accommodation and not expanding the School. Therefore, I recommend that permission be granted subject to appropriate conditions

**Replacement main school building at Sevenoaks Primary School, Bradbourne Park Road, Sevenoaks – SE/16/141 (KCC/SE/0007/2016)**

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**Recommendation**

55. I RECOMMEND that PLANNING PERMISSION BE GRANTED SUBJECT TO conditions, including conditions covering:

- the standard time limit;
- the development to be carried out in accordance with the permitted details;
- the submission of details of all materials to be used externally;
- the submission of details of external lighting, including hours of operation;
- the erection of tree protection fencing prior to commencement of the development to ensure that existing trees would be adequately protected;
- the submission of a detailed scheme of landscaping and tree planting to not only require the provision of amenity planting in close proximity to the proposed building, but detail how the site would be reinstated following demolition of the existing school building;
- no tree removal during the bird breeding season;
- the submission of the results of an additional bat emergence survey prior to demolition of the main school building;
- the submission of an updated badger survey and any required mitigation prior to the commencement of the development;
- the submission of a Biodiversity Management Plan (ecological enhancements for the site);
- the submission of an updated Travel Plan prior to occupation, and thereafter ongoing monitoring and review;
- provision and retention of 4 car parking bays (57 total on site), and reopening and retention of the onsite pick-up/drop-off area;
- the submission of a detailed Sustainable Surface Water Drainage Scheme;
- the submission of details of the implementation, maintenance and management of the Sustainable Surface Water Drainage Scheme;
- the control of surface water drainage into the ground (there should be no discharge to ground within a Source Protection Zone);
- measures to address any land contamination;
- 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;
- construction management strategy, including access, lorry routeing, parking and circulation within the site for contractor's and other vehicles related to construction and demolition operations;
- measures to prevent mud and debris being taken onto the public highway.

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

- With regard to the requirement to prepare and submit a (revised/amended) School Travel Plan, the applicant is advised to register with Kent County Council's Travel Plan Management system 'Jambusters' using the following link <http://www.jambusterstpms.co.uk>. Jambusters is a County Wide initiative aiding Schools in the preparation and ongoing monitoring of School Travel Plans.
- The applicant's attention is drawn to the letter from Highways and Transportation in which it is advised that parking bay 28 should not be marked as a disabled space as it would block car parking spaces 26 & 27.
- The applicant's attention is drawn to the letter from the Environment Agency in which advice and guidance is provided with regard to surface water drainage and waste.
- The applicant is advised that any external lighting on site should adhere to the Bat

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Conservation Trusts Guidance, and that the Construction Management Plan should include measures to protect land suitable for reptile habitat within the site.

Case officer – Mary Green
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03000 413379
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Background documents - See section heading
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