

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016)

A report by Head of Planning Applications Group to Planning Applications Committee on 14 September 2016.

Three temporary single storey classrooms to accommodate the 2016/2017 allocation of pupils (in conjunction with a separate application to permanently expand the school (KCC/DA/0085/2016), two additional bus bays within the Academy site, provision of a new footpath link between the car park and Public Right of Way DR118/118A to the north west, and widening of a section of footway on Common Lane - at Wilmington Academy, Common Lane, Wilmington (KCC/DA/0088/2016) (DA/16/799)

Recommendation: Planning permission be granted subject to conditions.

Local Member: Mrs Ann Allen

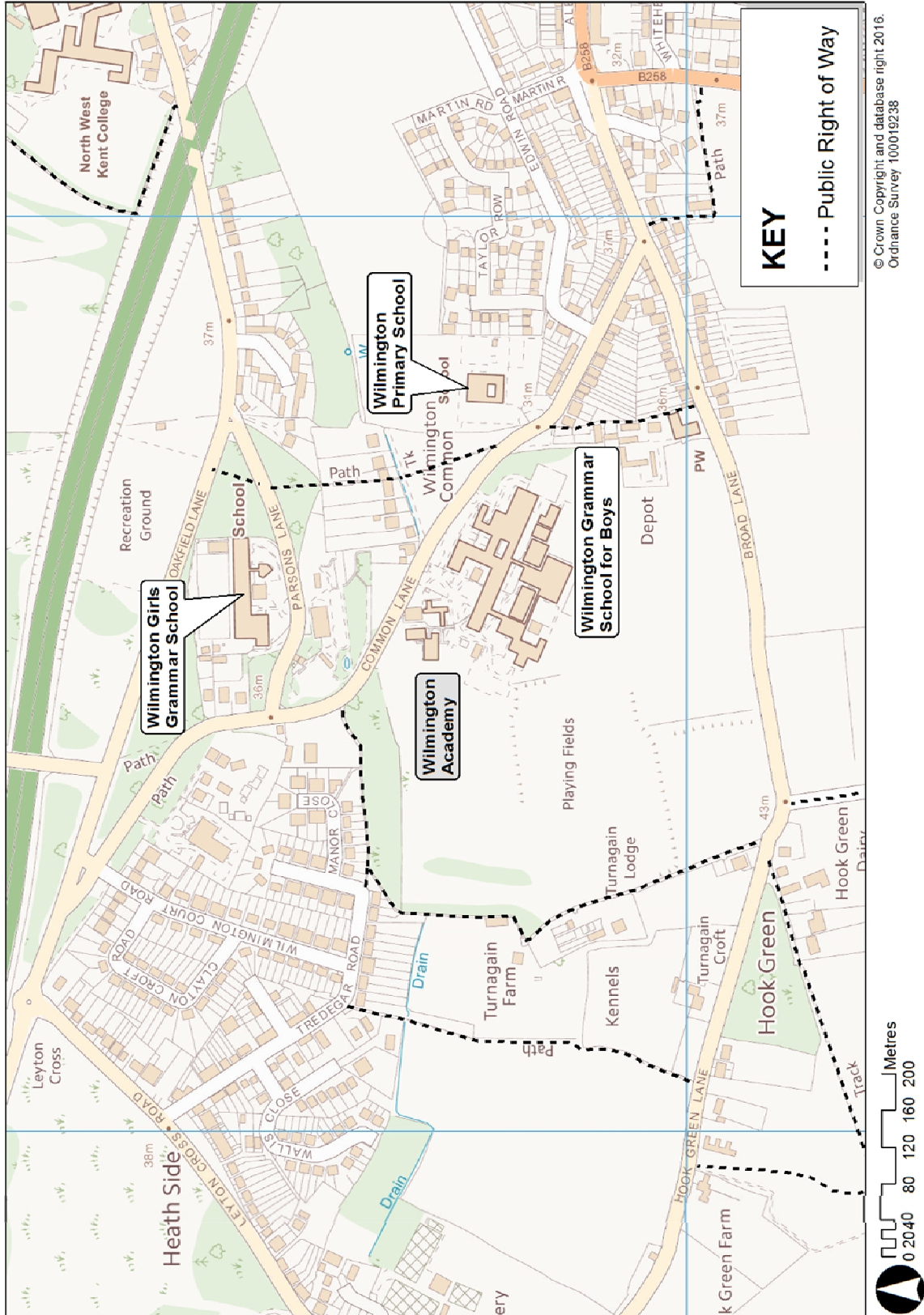
Classification: Unrestricted

Application Site

1. Wilmington Academy is located to the north west of the village of Wilmington and is accessed via Common Lane, a road which links Wilmington to Leyton Cross - a small residential area to the northeast of the Academy site. Dartford town centre is located approximately 2.3kms (1.4 miles) to the north east of the Academy site. The whole of the 8.45 hectare (20.8 acre) Academy site is located within the Metropolitan Green Belt. Built development on the site is concentrated to the north east of the site, adjacent to the Common Lane site frontage, with playing fields and open grassland extending to the south and west, beyond which lie open agricultural fields and the wider countryside. The northern boundary of the Academy site is a heavily wooded steep embankment, beyond which lies Public Right of Way (PROW) DR118A, which links with PROW DR118 which follows the western boundary of the Academy site. To the north of the application site, beyond the PROW DR118A, residential properties in Manor Close and Tredegar Road back onto the site from an elevated position. A small row of residential properties are located opposite the existing site exit on Common Lane, and face toward Wilmington Common.
2. The Academy site was recently redeveloped (see paragraph 5 below), providing a purpose built new Academy building and a new site entrance and car parking area. Previous to this, the Academy operated from buildings that were built in the mid 1970's, which were then split in the 1980's to accommodate two schools, Wilmington Grammar School for Boys (WGSB) and Wilmington Academy. The Academy continues to occupy the north western side of the site, albeit in a new building, with WGSB (which has Academy Status) to the south east. The organisation of the whole site is further complicated by a third school, Wilmington Grammar Schools for Girls (WGSG), who own a sports pitch in the south west corner of site and have rights of access through the Academy to reach it. The Academy and WGSB share one exit point onto Common Lane, with the Academy entrance located to the north of that exit, with a oneway access loop extending up to the frontage of the Academy building for pupil drop off linking the entrance and exit. A private nursery is located to the front of the Academy site, within the access loop and on the Common Lane road frontage. In addition to WGSB, Wilmington Grammar School for Girls (WGSG) is located to the north of the Academy site, accessed via Parsons Lane, which links Common Lane with Oakfield Lane. Further, to the south east of the Academy site, Wilmington Primary School is located to the northern side of Common Lane, again accessed via Common Lane only.

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy - (KCC/DA/0088/2016) (DA/16/799)

Site Location Plan



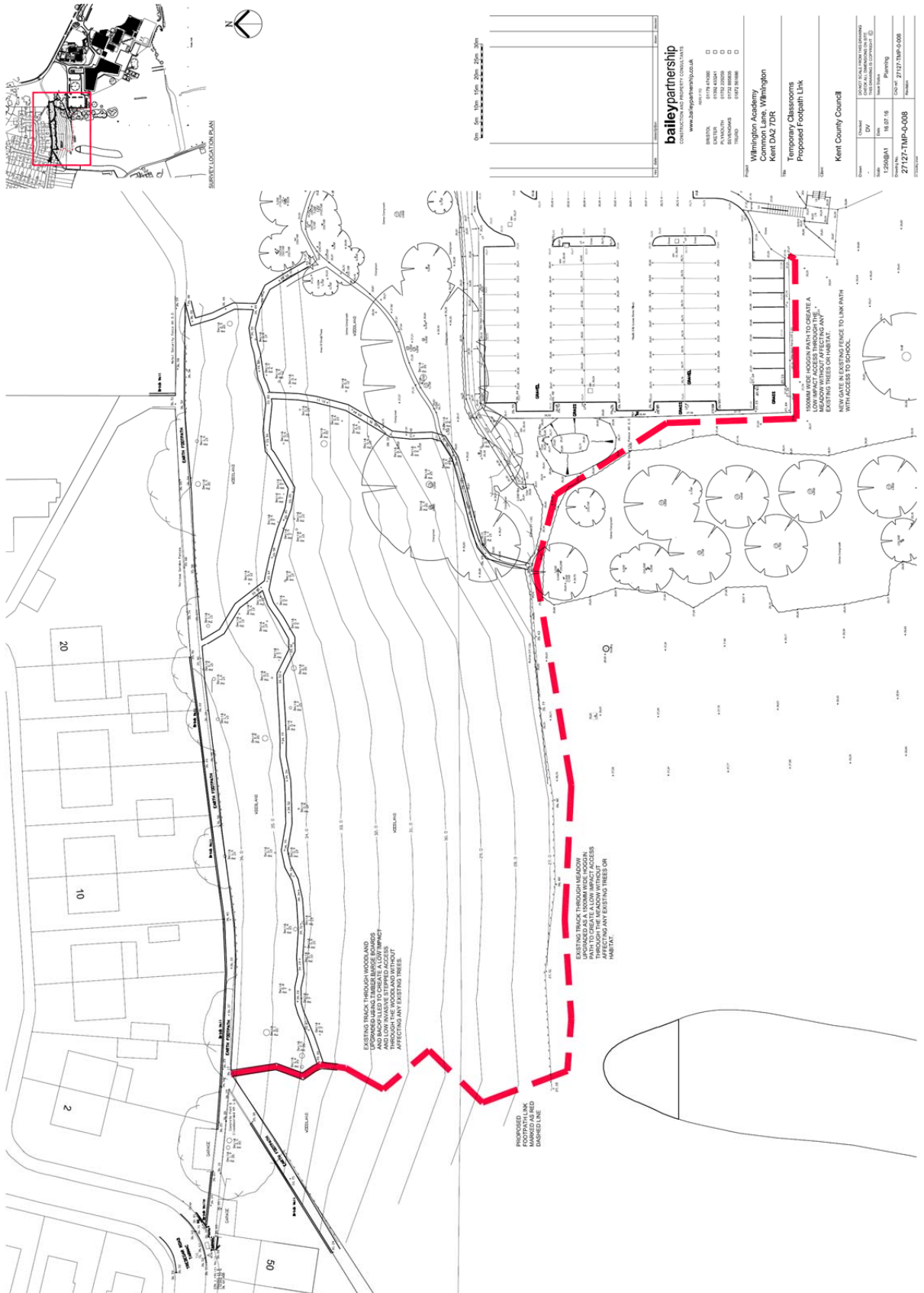
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Proposed Site Plan



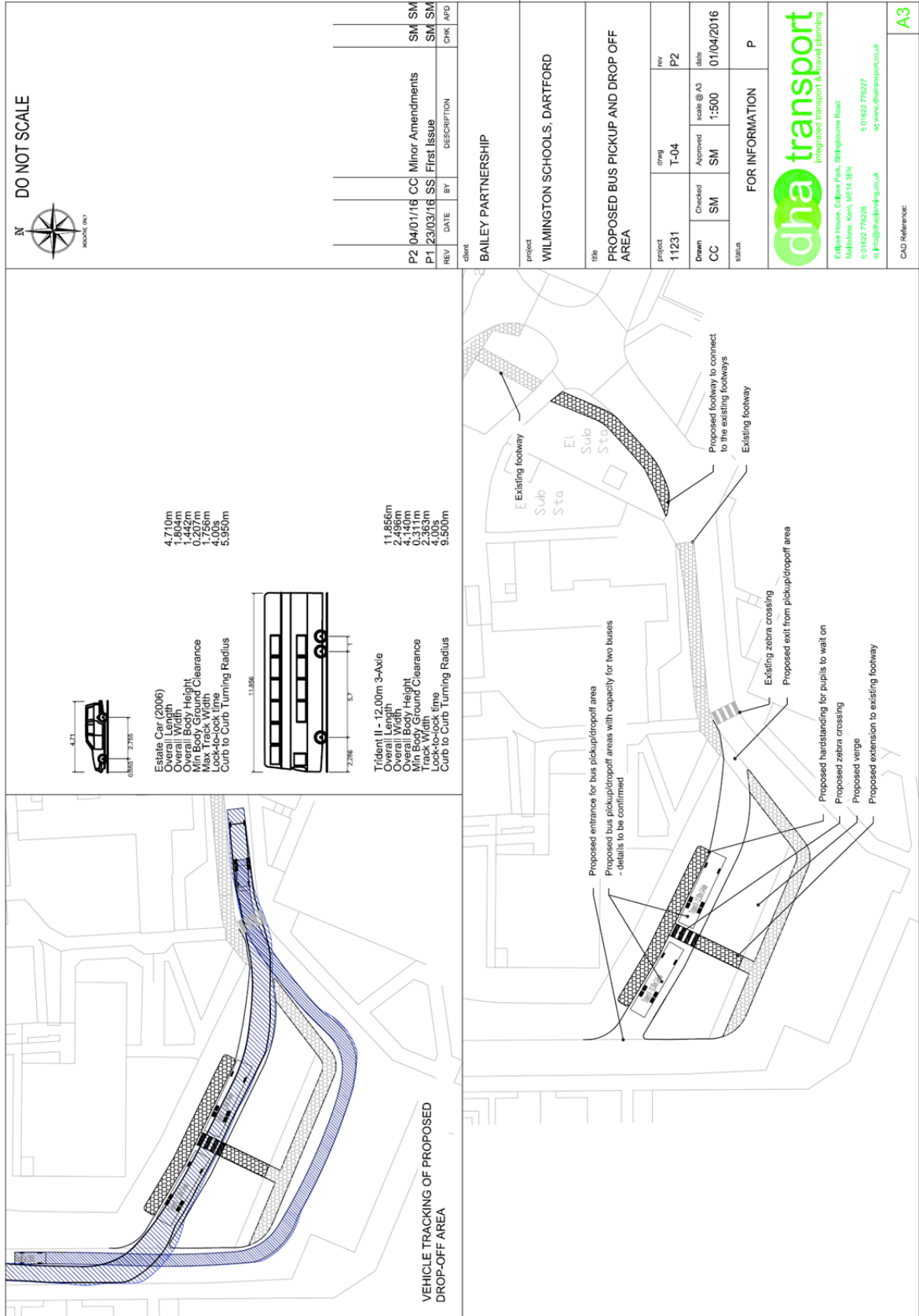
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Proposed Onsite Footpath Link (dashed line)



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Proposed Bus Drop-off/Pick-up Spaces



Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

3. In light of the site's Green Belt designation, this application has been advertised as a Departure from the Development Plan. However, should Members be minded to permit, the application would not, in this particular case, need to be referred to the Secretary of State due to the size, scale and impact of the development (to be discussed in detail within the discussion of this report). *A site location plan is attached.*

Background and Relevant Planning History

4. Wilmington Academy has been operating as an Academy since 1 September 2010, originally in the buildings of the former Wilmington Enterprise College. The Academy is part of The Leigh Academy Trust federation, which was formed in 2008 with the linking of the Leigh Academy (Dartford) and Longfield Academy. The Trust now encompasses 9000 students in 13 primary, secondary and special academies, five of which are in the Dartford Borough, three in Maidstone Borough, two in the Sevenoaks District, one in Tonbridge and Malling Borough, and two within London Boroughs.
5. Planning permission was granted in 2012 (consent reference DA/12/14) for the redevelopment of the academy site, which included the demolition of the majority of the existing buildings and the erection of a two storey academy building and sports centre, in addition to associated landscape works and the provision of a new dedicated access point leading to 92 car parking spaces and 4 bus drop off/pick up spaces. That redevelopment did not propose any expansion to the Academy, and was designed to accommodate a maximum capacity of 950 pupils.
6. Wilmington Academy is, however, now proposed to expand incrementally over a 5 year period from a 6 form of entry (FE) Secondary School (900 pupils plus sixth form, with a pupil admission number (PAN) of 180) to a 8 FE School (1200 pupils plus sixth form, with a PAN of 240). An application for permanent accommodation to house the proposed additional pupils was submitted in parallel to this application. That application, reference KCC/DA/0085/2016 is yet to be determined due to a significant level of local objection regarding highway safety and access issues, and an objection from Kent County Council Highways and Transportation (due to highway safety concerns). Discussions between the Applicant and Highways and Transportation are ongoing, with issues still unresolved at the time of writing this report.
7. In addition to the proposals to expand Wilmington Academy, we are also in the process of determining two applications at Wilmington Grammar School for Girls. The first of these proposes the relocation of an existing temporary modular building (Item D1 on these papers KCC/DA/0091/2016) and the second proposes the erection of a two storey teaching block to facilitate a 1FE expansion of the Grammar School from 4FE to 5FE (1050 pupils including sixth form). That application, reference KCC/DA/0090/2016, has also met with a significant amount of local objection regarding highway safety and access issues, and there is an outstanding request from Highways and Transportation for the applicant to provide additional information. Again, discussions between the Applicant and Highways and Transportation are ongoing. It should also be noted that Wilmington Grammar Schools for Boys is in the process of expanding, with a September 2016 intake of 977 pupils, an increase of 50 pupils over the 2015 intake.
8. Further to the above, I am advised by the applicant that demand for school places within the Dartford Borough has already resulted in Wilmington Academy experiencing a rise in its PAN to 200 in 2014 and 2015. In addition, the Education Authority advises that it has offered places at the Academy to 240 pupils for September 2016, and that projections

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

identify a need for an ongoing PAN of 240. The applicant advises that the projected number of pupils on roll in September 2016 is 1134, 184 pupils above the 950 pupil capacity of the buildings permitted when the academy was redeveloped in 2014 (consent reference DA/12/14). Therefore, in considering this application, we need to assess the impact of an additional 184 pupils, not just the additional 40 proposed to start in September 2016.

Amendments Following Initial Submission

9. When originally submitted this application met with serious concern and objection from Highways and Transportation on the ground of highway safety, particularly the potential for additional pupils using the footway between the Academy exit and Parsons Lane. That footway, which runs to the eastern side of Common Lane, experiences existing serious pedestrian safety issues due to buses having to mount the pavement to enable two buses to pass each other due to the narrow width of the road at this point. The high number of pedestrians using this narrow footway at peak school times, due to the number of schools in the immediate locality, means that there is regular conflict between pedestrians and vehicles.
10. As a result of the initial objection from Highways and Transportation, the applicant spent a significant amount of time discussing the application with Highway Officers in an effort to identify improvements that could be made to pedestrian access and to further identify measures that could be included within the application that could mitigate the concerns/points of objection raised. A key issue to resolve was ensuring that pedestrian activity on Common Lane was not increased.
11. As a result of such discussions, the applicant amended to proposal to include:
 - two additional bus bays within the Academy site;
 - provision of an onsite footpath link between the Academy car park and Public Right of Way DR 118/118A to the north west (joining with Tredegar road); and
 - the widening of a section of footway on Common Lane, at the junction with Parsons Lane, by removal of an area of vegetation/scrub.
12. As will be discussed in detail later in this report, the measures outlined above, although positively received, were not considered sufficient on their own to overcome Highway and Transportations points of objection. As a result, the application was further amended by:
 - a reduction in the number of modular classrooms proposed from an initial six to three;
 - the submission of a revised Travel Plan detailing measures and initiatives to be put in place to manage pupil pedestrian activity and encourage use of the internal footway by Academy pupils and other local schools; and
 - the proposed surfacing of Public Right of Way DR118A.
13. It is the revised proposal that will be discussed throughout this report.

Proposal

14. This application (as amended) has been submitted by Kent County Council Property and Infrastructure Support, and proposes the provision of three temporary classrooms to accommodate the 2016 additional pupil intake and previous intakes over and above the 6FE original pupil admission number (PAN) of 180 pupils per year. As set out above, that equates to an additional 184 pupils over and above the 950 capacity approved in

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

2012, with a projected school roll of 1134 in September 2016. The Academy have stated that an additional four full time equivalent (FTE) staff would be employed from September 2016, bringing the total number of FTE staff at the Academy up to 158.

15. The applicant advises that the proposed temporary buildings would be used for the education of students during the period of September 2016 to September 2017, with the intention then being to remove the buildings and decant into permanent accommodation (subject to planning approval (application reference KCC/DA/0085/2016)). Initially six mobile classrooms were proposed, but the applicant recently reduced this number to three.
16. The applicant advises that, following further consultation with the Academy Management Team, it was identified that it would be possible to accommodate additional teaching areas within the main academy building by undertaking some internal alterations (which do not require planning approval), hence the reduction in the amount of temporary accommodation proposed. Analysis of the existing accommodation within the academy building identified that the proposed increase in the school roll would also necessitate the provision of an additional food technology room, additional IT suites and an increased dining area. From assessing the floor plans, the applicant identified that the required food technology room and dining space could be provided within the existing building by undertaking internal alterations, including the sub-division of an IT suite. Three additional teaching spaces are also proposed to be provided within the main academy building, although it should be noted that these alterations would result in pupils being taught in unconventional classroom spaces. The proposed three temporary classroom units are intended to be used to provide the remaining required accommodation – replacement and additional IT suites.
17. The three temporary classrooms are proposed to be located to the south of the existing building, to the rear of the school, accessed via a bridge link to the main school building. The building would be sited on an area of amenity grassland, on the edge of the playing fields. The existing boundary fencing is proposed to be temporarily extended to include the temporary classrooms within the secure perimeter of the academy which separates the buildings and the playing fields. In addition to the fencing re-alignment, landscape and enabling works would be limited to a temporary access path and the provision of timber steps and a ramped access to the classrooms.
18. The three classrooms would be contained within two buildings, one measuring 9.8m x 16.8m (32.1ft x 55.1ft), which would accommodate two classrooms, storage and circulation space, and the other measuring 9.8 x 10m (32.1ft x 32.8ft), which would accommodate one classroom, storage and circulation space. The total floorspace proposed is 210sqm (2260sqft). The applicant advises that the buildings external walls would be coloured with a standard finish such as ivory or gunmetal, and window and doors would be white UPVC.
19. As outlined in paragraphs 11 & 12 above, the applicant is also proposing a package of measures in an effort to mitigate the access implications associated with the increase in pupil numbers at the site as a result of the additional intake in 2016 and over previous years (184 additional pupils in total over the 950 school capacity of the buildings permitted in 2012).
20. First, an onsite footpath link is proposed to be created to link the Academy site with PROW DR118A at its western end adjacent to Tredegar Road. The route would follow an existing desire line through the treed embankment to the north of the site, and would

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

be stepped and surfaced with compacted aggregate, with timber bargeboard edging. The applicant advises that the proposed route would have a negligible impact upon existing trees and wildlife habitat as it would follow an already trodden pathway. The route between the academy building and the point where it joins the PROW would measure 214.49metres (703.72ft), in comparison to a 334.65metre (1097.93ft) route from the academy building to the same point on the PROW but via Common Lane.

21. Public Right of Way (PROW) DR118A, which extends along the northern boundary of the Academy site between Common Lane to the east and Tredegar Road to the west, currently has an unmade surface. It is proposed to surface the extent of the PROW with a compacted aggregate surface, with timber barge board edging, to match that of the proposed onsite footpath link.
22. It is also proposed to widen approximately 70 metres of the existing footway at the junction of Common Lane and Parsons Lane, extending south on Common Lane towards the academy entrance. An existing area of uneven and overgrown verge between the boundary fencing of WGSG and the public footpath would be cleared and levelled, and thereafter resurfaced to widen the footway.
23. Two additional dedicated bus bays are also proposed within the academy site to separate bus and car drop off areas (currently combined) to create a freer flow of traffic onsite. The bus bays are proposed to the north east of the existing drop off area, and would be created by adding a second shorter link road between the entrance road into the site and the road leading to the exit. An area of hard standing would be provided for pupils to wait safely off of the road way and a zebra crossing is proposed to enable pupils to cross the bus drop-off link road safely to access the academy building.
24. With regard to the existing car accessed pupil drop-off/pick-up area, I am advised by the applicant that this is currently only available for use at the morning peak period. As part of this proposal, the Academy have agreed that the facility would also be made available for use at the afternoon peak period, and would be managed by academy staff.
25. Lastly, the Academy has updated its School Travel Plan and signed up to initiatives and commitments to improve pedestrian safety. The Academy (and WGSG) have committed to monitor inappropriate parking by parents in the area at the beginning and end of the school day, to oversee pupils crossing Common Lane to access PROW DR118A, and to collaborate with surrounding schools and local bus operators to better manage and coordinate bus movements. In addition, a joint venture between the Academy and WGSB would manage pupil flows at the existing zebra crossing on Common Lane in order to improve pupil safety and to reduce traffic delays. Further, pupils from the Academy and WGSB would be encouraged to use the proposed onsite footpath link to the PROW as opposed to Common Lane. The footpath link would be accessible for use between the hours of 0730 and 0930 on term time mornings and between 1430 and 1630 on term time afternoons. I am further advised that the route would be available for use by pupils of other local schools, including those at Wilmington Primary School.

The application is supported by a Design and Access Statement, Green Belt and Playing Field Policy Statement, Supplementary Green Belt Statement, School Travel Plan (including amended/updated version), Education Justification Statement, Transport Assessment, Transport Assessment Addendum, Arboricultural Implications Assessment, Ecological Assessment, and Supplementary Planning Statement.

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

Planning Policies

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

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

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

- achieving the requirement for high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
- the great importance the Government attaches to Green Belts, with the fundamental aim of Green Belt Policy being to prevent urban sprawl by keeping land permanently open;
- consideration of whether the opportunities for promoting sustainable transport have been taken up and safe and suitable access to the site can be achieved for all people;

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.

Development Plan Policies

- (iii) The adopted **1995 Dartford Borough Council Local Plan (Saved Policies September 2011)**:

Policy B1 Development proposals should be appropriate for the location and should not have a detrimental amenity impact on the local area. A high standard of design should be implemented in proposals with

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

layout, materials, adequate infrastructure, access and parking taken into consideration.

Policy S4 There is a presumption against development in the Metropolitan Green Belt, as defined in the Local Plan; continued protection will be given to the Countryside and its amenity value and recreation potential will be enhanced.

Policy S6 Development proposals should conserve and improve the existing built environment and a high quality and standard of design shall be achieved in new development.

Policy T19 Development proposals should be appropriately related to the highway network and not generate volumes of traffic in excess of the capacity of the highway network.

Policy T23 Development proposals should include adequate off-street parking facilities.

Policy T27 Development proposals shall make adequate provision for pedestrians.

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

Policy CS13 Seeks to resist inappropriate development within the Green Belt, in accordance with the NPPF.

Policy CS15 Pledges support for minimising the need to travel and minimising car use, whilst making effective use of the transport network. Travel plans will be required for all significant traffic generating development to ensure more sustainable modes of transport are pursued. Kent County Council's parking standards will be applied.

Policy CS21 Seeks the provision of community facilities that are close to the population they serve and that come forward in a timely fashion. Dual use of facilities is sought.

(v) Emerging **Dartford Development Policies Plan (Publication (pre-submission) Document December 2015)** (This document was submitted to the Planning Inspectorate in June 2016 and an Examination is due to commence in October 2016, with the plan expected to be adopted by Dartford BC towards the end of 2016 or early 2017.)

Policy DP1 Presumption in Favour of Sustainable Development: States that the Plan is written in accordance with national objectives to deliver sustainable development. A positive approach to considering development proposals will be had, reflecting the presumption in favour of sustainable development contained in the NPPF and the development needs of the Borough set out in the Core Strategy.

Policy DP2 Good Design in Dartford: Development will only be permitted where it satisfies the locally specific criteria for good design in the Borough by (a) reinforcing and enhancing localities to create high quality places,

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

(b) ensuring heritage assets are retained, re-used and respected, (c) facilitating a sense of place through a mix of uses and careful design, (d) providing clear pedestrian and cycle linkages and permeability, active frontages and a mix of buildings and spaces. Provides further advice about determining planning applications in relation to scale, massing, form, materials, Conservation Areas and areas of heritage sensitivity, inclusive, safe and accessible places, management of natural resources and flood alleviation, and appropriate signage and advertisements.

Policy DP3 Transport Impacts of Development: Development will only be permitted where it is appropriately located and makes suitable provision to minimise and manage the arising transport impacts, in line with Core Strategy Policies. Localised residual impacts on the highway network should be addressed by well-designed off site-transport measures and adverse impacts on residential amenity or the environment must be minimised. Development will not be permitted where the localised residual impacts from the development, on its own or in combination with other planned development in the area, result in severe impacts on one or more of the following: (a) road traffic congestion and air quality (b) safety of pedestrians, cyclist and other road users and (c) excessive pressure for on-street parking.

Policy DP4 Transport Access and Design: Development should be of a design and layout to promote walking, cycling and use of public transport through provision of attractive and safe routes. Proposals should also include appropriate vehicular access arrangements. Development will only be permitted where proposals ensure that the layout and siting of access is acceptable in terms of residential amenity, highways capacity and safety, free flow of traffic, cyclists and pedestrians, and visual impact.

Policy DP5 Environmental and Amenity protection: Development will only be permitted where it does not result in unacceptable material impacts, and consideration must be given to potential amenity/safety factors such as traffic, access and parking, anti-social behaviour and littering, and intensity of use (amongst other matters).

Policy DP22 Green Belt in the Borough: Sets out 12 aspects against which development in the Green Belt will be assessed, including criteria to assess development considered as potentially not inappropriate by the NPPF; those developments that support Core Strategy Policy CS13; the re-use of existing permitted permanent buildings; taking account of the character and scale of existing buildings; criteria relating to extensions to buildings or infilling of previously developed sites; the replacement of buildings; ensuring no loss of the best and most versatile agricultural land; criteria for proposals for farm diversification; the use of land for horses or the erection of stables; outdoor sports and recreation uses; and the infrastructure required for such uses.

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

Consultations

27. **Dartford Borough Council** raise objection to the proposal and comment as follows:

“In the opinion of Dartford Borough Council the location of the proposed portacabins would represent inappropriate development within the Green Belt contrary to paragraph 89 of the NPPF. The portacabins would result in development encroaching even further into the Green Belt away from the existing built up confines of the school site, which would harm the openness and appearance of the Green Belt. Dartford Borough Council objects to the proposal and request that the applicants consider a revised siting of the temporary portacabins to locations elsewhere within the Wilmington Academy site, in order to minimise the impact on the openness of the Green Belt.

Dartford Borough Council’s aerial photos appear to show that the proposed portacabins would also encroach upon an existing cricket pitch, but the submitted drawings show that the portacabins would not affect any sports pitches. KCC need to ensure that the proposal would not result in the loss of any sports pitches at the Academy.

Whilst it is considered that there are potential areas for car park expansion within the Academy site, it is recognised that the proposed traffic mitigation measures proposed within the application site (i.e. the double bus stop within the Academy site – to the south of the nursery / pre/school buildings; the new pedestrian footpath within the site and the widening of the pavement in Common Lane) would negate the impact of not providing any additional car parking, at least for the upcoming school year (2016 / 2017).

In spite of the above comments if KCC approved the proposal, Dartford Borough Council request that the portacabins only be granted a temporary one year permission and that all the proposed traffic mitigation measures are put in place before the portacabins are occupied.”

Wilmington Parish Council continue to raise strong objection to this application (and the other three applications currently being considered by the County Council for the expansion of the Academy and the Girls Grammar School). Although the onsite footway link between the Academy building and PROW DR118A was welcomed by the Parish Council, and the revisions made in terms of mitigation were considered to be an improvement over the original submission, the Parish Council consider that they still do not fully address the illegal and dangerous situations that are currently being experienced, and which would be exacerbated should these proposals go ahead.

The Parish Council consider that this proposal, taken in conjunction with the proposed permanent extension at the Academy and the planned expansions to both Wilmington Grammar School for Girls and Wilmington Grammar School for Boys, is unacceptable in what is a rural community without the infrastructure to cope with such large scale development. Although the Parish Council accept that each application must be considered on its own merits, it is considered that the County Council should take an overview of all of the current plans and proposals in the local area including the expansions of the other Schools in the locality.

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

The Parish Council further endorse and fully support the objections and concerns submitted by Wilmington Safer Streets (see below and Appendix 1) and urge that the County Council give them due consideration to ensure the safety of students and pedestrians and to maintain the quality of life of residents of the Parish.

A summary of the main points of concern and objection raised by Wilmington Parish Council to this application are as follows:

- Wilmington is fast becoming a 'no-go area', not only at peak school times but due in inconsiderate, and in some cases illegal parking, whenever the schools are open;
- The area has exceeded its ability to deal with the levels of traffic and associated parking, and promised improvements to alleviate the current problems have not materialised;
- The area is at saturation point, and it is time that there is an acceptance that further development in and around Common Lane is simply untenable, with a totally unacceptable impact on residents, whether due to traffic generation, the inability to successfully manage the traffic flow or the inadequate parking provision;
- For traffic to flow along Common Lane buses have no alternative other than to mount the pavement, a situation which places pedestrians in danger. However, installation of bollards or similar would simply mean that the road would come to a standstill as vehicles would be unable to pass each other;
- There would appear to be insufficient onsite parking to meet the increase in staffing level and sixth form students (who often drive to the Academy and other local schools);
- The proposed double yellow lines on Common Lane are not supported as they would have a detrimental impact on local residents (*not proposed as part of this application*);
- The onsite drop off loop should be available in the afternoon peak as well as the morning peak;
- The proposed onsite footpath link should be open to use by other schools, and managed/monitored to ensure that it is available for use at the appropriate times;
- The Academy has sent a letter to parents which states that works would commence during the summer holidays. This has thrown doubt on the transparency of the County Council's decision making processes;
- Access by construction vehicles should be restricted to avoid peak school times; and
- The County Council should hold a public exhibition/meeting to provide the local community with an overview of all four applications;

The Parish Council has also questioned why two nearby vacant school sites (one in Stock Lane, Wilmington, and the other in Egerton Avenue, Hextable) cannot be used to accommodate the additional pupils, either as new schools or as annexes to Wilmington Academy/Wilmington Grammar School of Girls.

Kent County Council Highways and Transportation initially objected to the application on grounds of additional trips generated, the inadequate mitigation proposed and the evident road safety issues on Common Lane.

However, following the submission of amendments to the scheme, including the mitigation measures outlined in paragraphs 19 through to 25 above, Highways and Transportation now raise no objection to this application and comment as follows:

“By way of background, I would like to draw your attention to our responses dated 16th June and 21st July 2016, each of which fully covered the highways

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

issues and raised holding objections to this application on the basis of the additional trips generated, the inadequate mitigation proposed and the evident road safety issues on Common Lane which were not mitigated. The key highways issues are the need to consider this application alongside the other proposed temporary and permanent expansions of the Wilmington schools, as well as the continuing 'organic' growth of these schools outside of the need for planning permissions, and to fully investigate highway and safety improvements needed in the local area as a consequence of the above and to come up with a comprehensive package of mitigation measures which all stakeholders would play their part in delivering.

In line with this, our previous highways responses recommended a number of measures and investigations to be carried out including the widening of the footway and carriageway on Common Lane, the creation of a direct pedestrian link from Wilmington Academy to footpath DR118A and Tredegar Road and the construction of a pedestrian route parallel to Common Lane through the edge of the Girls' Grammar School site. In addition, recommendations included the need for a detailed assessment of the unmarked pedestrian crossing point across Common Lane at the start of footpath DR118A particularly in view of visibility for pedestrians, the active management of students using the zebra crossing outside the exit from the Academy, the establishment of a bus partnership to manage routing and safer driving practices and to review and update the Academy School Travel Plan to monitor and reinforce the above and to promote sustainable and safe travel practices.

Highways officers have undertaken numerous site visits, we have reviewed and appreciated the representations made by local people and we have attended meetings with the applicants and their transport consultants. I would also like to acknowledge the additional work which has now been produced by the consultants via their Supplemental Planning Statement dated 3rd August 2016, the work to prepare drawing 11231-T10 showing outline proposals for a potential widening of the carriageway and footway along Common Lane as well as the investigations into the creation of a pedestrian route parallel to Common Lane through the Wilmington Grammar School for Girls.

In terms of the number of students the applicants have now confirmed that from September 2016 there will be 1134 students on the school roll. The previous planning application for the Academy was based on 950 students. As such, the uplift at the Academy to be considered as part of this planning application is 184 students.

A key part of our discussions have focused on ensuring there is no further net increase in the number of students who walk along Common Lane in peak hours and to ensure safety improvements will be delivered in the near future.

The following is now proposed:

- A reduction in the number of temporary classrooms from 6 to 3 to limit the potential for further 'organic' growth.
- Provision of a new footpath link from footpath DR118A in the vicinity of Tredegar Road to the Academy site. I understand the Academy has agreed that this route would also be available to students at Wilmington Boys Grammar, accessible between the hours of 0730 - 0930 and 1430 – 1630

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

and that they have been asked to also make this route available to all local students. This would enable a 'safer' pedestrian route to be created away from Common Lane.

- The widening of the footway on Common Lane between Parsons Lane and footpath DR118A up to the boundary fence. Importantly this would also enable visibility for pedestrians crossing Common Lane towards footpath DR118A to be improved. The visibility has been measured and would be 43m to the right (southbound traffic) and 55m to the left (northbound traffic), which accords with the standard required in Manual for Streets for a 30mph road.
- Provision of two additional dedicated bus bays within the Academy grounds to separate car and bus drop off to separate car and bus drop off facilities.
- An update of the Academy School Travel Plan to actively promote sustainable and safer travel including working with the local and school bus operators to better manage and co-ordinate bus movements, to actively discourage inappropriate parking, the management by staff of students at peak times at the zebra crossing adjacent to the exit from the Academy and a commitment to permit parents to use on-site drop off facilities during both the morning and afternoon peaks.

With the new link from footpath DR118A to the Academy site it has been estimated that there would be an overall net reduction of 98 pedestrian movements in each peak period along Common Lane and a reduction of 127 pedestrian movements crossing Common Lane at footpath DR118A. These numbers take into account students from the Academy and Boys Grammar. On this basis and on the basis that all of the measures outlined above can be conditioned to ensure an early delivery of the measures to improve sustainable access to the Academy and road safety I can confirm that the highways objection to this application is now resolved.

In addition to the above (outside of this planning application process) I understand that the Schools and nearby property owners have been required to cut back overhanging vegetation on Common Lane to reduce the likelihood of large vehicles overrunning the footway, that the County Council is investigating the potential for an additional formal pedestrian crossing on Common Lane in the vicinity of Wilmington Primary School supported by the local County Councillor and that proposals to enhance parking restrictions to reduce the likelihood of inappropriate parking and to refresh worn road markings are also being progressed.

For the avoidance of doubt please note that this in no way represents an overcoming of the highways concerns in respect of the proposed permanent expansions for the Wilmington Schools. With this in mind we look forward to further feasibility investigations continuing into the potential widening of the footway and carriageway on Common Lane and the potential creation of a footpath through the Wilmington Grammar School for Girls site."

Sport England raises no objection to the application subject to a condition being attached to the decision notice (should permission be granted) requiring the removal of the temporary buildings from site by 1 September 2017, and the subsequent reinstatement of the area as playing field.

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

Although the application would result in a temporary loss of a usable part of playing field (as defined by Sport England), Sport England have considered the following:

- The temporary reduction in the area of playing field associated with the proposals is unlikely to have a significant impact on the sites ability to accommodate cricket for the current year as four wickets would still remain in the closest pitch to the proposed development. The England and Wales Cricket Board (ECB) have confirmed that four wicket strips would allow play;
- The clearance distance required by the ECB would still be met; and
- The development would be temporary and it is expected that the area would be restored as playing field use at the end of the temporary period.

The County Council's Biodiversity Officer raises no objection to the application and considers that no further information needs to be submitted. The precautionary measures outlined in the submitted Ecological Assessment must be implemented during the 'construction' of the footpath link onsite, and works should be undertaken outside of the bird breeding season (March to August) unless supervised by an experienced ecologist. Some ecological enhancements are recommended within the submitted Ecological Assessment, and further consideration should be given to the provision of those, and other enhancement measures.

Public Rights of Way supports the application and requests that an informative be placed on any forthcoming decision advising the applicant of the requirement to seek the relevant approvals from the County Council's PROW team with regard to undertaking any works within or adjacent to the boundaries of the PROW.

I have also received 9 representations from **Wilmington Safer Streets** who strongly object to this application, and the other three applications that the County Council are currently considering at the Academy and Girls Grammar School. Wilmington Safer Streets is a local group set up to campaign for the improved safety of the streets of Wilmington, and at the time writing this report has 475 members.

A copy of a full representation from Wilmington Safer Streets can be found in Appendix 1 of this report, but the key points of concern and objection regarding this particular application are summarised within paragraph 34 of this report, along with a summary of individual neighbour representations (many are also members of Wilmington Safer Streets, and the same points of objection and concern were raised by all).

Local Member

28. The local County Member, Mrs Ann Allen, was notified of the original application on the 18 May 2016. Further notifications regarding the amended proposals were sent on the 12 July 2016 and 8 August 2016.
29. The two Dartford Borough Council Members for the ward of Wilmington, Cllr Eddy Lampkin and Cllr Derek Hunnisett, have raised objection and concern regarding the proposal and have expressed their full support for the views of Wilmington Parish Council, Wilmington Safer Streets, and local residents.

Publicity

30. The original application was publicised by the posting of 3 site notices and advertisement in a local newspaper. The amended proposal (addition of 2 bus bays, a

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

footpath link between the rear of the school and Public Right of Way DR118/118A, and widening of a section of footway on Common Lane) was publicised by the posting of 3 site notices, advertisement in a local newspaper, and the individual notification of 16 neighbouring properties.

31. Planning Application reference KCC/DA/0085/2016 for a permanent classroom block to facilitate expansion of Wilmington Academy was received and publicised at the same time by the posting of 3 site notices, advertisement in a local newspaper and the individual notification of 19 local properties.

Representations

32. In response to the publicity, 20 letters of representation have been received from 13 local addresses specifically regarding this application, in addition to two letters questioning the extent of consultation and validation processes. This is in addition to the 9 representations from Wilmington Safer Streets (see paragraph 27 above and Appendix 1).
33. Due to the fact that the two Academy applications (KCC/DA/0088/2016 & KCC/DA/0085/2016) were submitted at the same time, in addition to the two applications at Wilmington Grammar School for Girls (KCC/DA/0090/2016 & KCC/DA/0091/2016) the majority of the representations received relate to both this application for the temporary building and also the proposed permanent extension and, in many cases, all four applications. In total, I have received in excess of 60 letters of representation regarding the proposed expansion of Wilmington Academy.
34. The key points raised by Wilmington Safer Streets and local residents with regard to this application are summarised as follows:

Highway/Access Matters

- Common Lane is a narrow lane, too narrow for vehicles to pass, resulting in buses and large vehicle having to mount the pavement;
- At peak school times the pavements are heavily used due to the amount of schools in the immediate locality;
- Pedestrians, including pupils, have been hit by buses/coaches as they have mounted the kerb;
- The pavements on Common Lane are narrower than the recommended width in places, and are only on one side of the road;
- None of the proposed mitigation addresses the dangerous issue of vehicles mounting the pavement to pass each other;
- A weight restriction needs to be introduced on Common Lane to prevent lorries from accessing the road as they currently conflict with school traffic on a daily basis (over 100 lorries a day use the road);
- Buses should be banned from Common Lane and a bus/coach park provided on Oakfield Lane, or at the least the road should be made one way to prevent vehicles having to pass each other;
- The roads around the Wilmington Schools are already chaos at peak school times, and literally at grid lock;
- There are 3 Secondary Schools, a Primary School and a Nursey all accessed from Common Lane, the road cannot accommodate anymore;
- The village of Wilmington cannot support 3 Secondary Schools so pupils are bussed in or brought by car, few pupils are within walking distance;

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

- Those that can walk to school often don't as it is too dangerous;
- Common Lane is already a dangerous road at peak school times, expansion of the Academy would only make this worse;
- A 20mph speed limit should be introduced on Common Lane;
- Parents and sixth formers park dangerously and in some cases illegally, blocking access for local residents, and more importantly emergency services;
- Paths are blocked by parked cars, resulting in people (including Primary School Children) having to walk in the road;
- The drop off loop on the Academy site needs to be made available for use at the afternoon peak, not just the morning peak as is currently the case;
- Double yellow lines should not be provided along the edge of the Common as this would inconvenience residents who need to park in the evenings/weekends, and also would just relocate the parking problem to other local roads;
- An additional crossing needs to be provided, especially in close proximity to the Primary School;
- Decent footpaths and cycle ways need to be provided to encourage pupils to travel to school sustainably;
- Roads and pavements are already in a poor state of repair;
- A footway to the rear of the Academy is desperately needed and is a welcomed addition to the plans;
- The footway within the Academy site must be made available for use by pupils from other schools, and should be monitored and maintained;
- Crossing Common Lane to get to PROW DR118A (and visa versa) is dangerous at the brow of a hill on a bend, and visibility splays are inadequate;
- PROW in the area are poorly lit, reducing their use;
- The Transport Assessments are inaccurate and do not represent the real situation;
- None of the Schools in Wilmington show any commitment to keeping their Travel Plans up-to-date, so how can this be relied on as a mitigation measure;
- School monitoring of parent parking is not enforceable;
- There is inadequate signage on Common Lane to warn drivers of children crossing;
- Vegetation along Common Lane needs cutting back as overhanging vegetation further narrows the carriageway;

Other Matters

- There are two empty schools within three miles of the Academy, one of which only closed in recent months and was a secondary school so must have the accommodation required for these additional pupils;
- The village is becoming overdeveloped which is ruining its rural character and destroying the community;
- All of the applications for development and expansions of the Wilmington Schools (WGSB, WGSG, the Nursery and the Academy) should be considered together, not in a piecemeal fashion;
- The residents of Wilmington have not been considered at all, and the proposals have not been sufficiently advertised;
- The Academy have already recruited staff and advised parents that this development is going ahead – it's a fait accompli;
- Air pollution is already high in the area;
- Litter and antisocial behaviour is already an issue;

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

Discussion

35. In considering this proposal regard must be had to the Development Plan Policies outlined in paragraph 26 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 Development Plan Policies, Government Guidance, including the National Planning Policy Framework (NPPF), and other material planning considerations arising from consultation and publicity. Issues of particular relevance include impact upon the Metropolitan Green Belt, highway implications and access, loss of playing field, general amenity matters, and whether the development is sustainable in light of the NPPF.
36. Dartford Borough Local Plan Policy B1 seeks to conserve and enhance the environment and requires developments to be sustainable, well designed and respect their setting. This is particularly relevant to this development site which is identified within the Local Plan as being within the Metropolitan Green Belt. Policy CS13 of the Dartford Borough Core Strategy seeks to resist inappropriate development within the Green Belt, unless justified by exceptional circumstances.
37. The NPPF, section 9, paragraph 80 states that the Green Belt serves five purposes:
- a. to check the unrestricted sprawl of large built up areas;
 - b. to prevent neighbouring towns merging into one another;
 - c. to assist in safeguarding the countryside from encroachment;
 - d. to preserve the setting and special character of historic towns; and
 - e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The NPPF further states that “as with previous Green Belt Policy, inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances”. The NPPF does not explain in any detail what ‘very special circumstances’ means, but does go on to say “very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations”. Any built development within the Metropolitan Green Belt could affect the openness of it and would be contrary to planning policies. On this basis the development proposed must be considered as a departure from the Development Plan. However, the need, or otherwise, to refer this application to the Secretary of State for his consideration will be assessed and discussed below

Green Belt Considerations

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

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

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

39. A Green Belt Policy Statement, and Supplementary Green Belt Assessment was submitted in support of this application, which sets out what the applicant considers to be the very special circumstances that warrant setting aside the general presumption against what would be inappropriate development in the Green Belt. The applicant considers the following 'very special circumstances' are sufficient to collectively outweigh a Green Belt policy objection:
- i) The identified need for additional Secondary School places within the Dartford Borough;
 - ii) National Policy and Central Government Support for the delivery of State Funded Schools;
 - iii) A lack of suitable alternative development options; and
 - iv) The limited impact of the development on the openness of the Green Belt.
- Each of these 'very special circumstances' as put forward by the applicant will be considered and discussed in the following section of this report. I will take each point in turn, first considering the case of need for school places in the Dartford Borough.

Case of Need and National Policy and Central Government Support for the delivery of State Funded Schools

40. As outlined in paragraph 26 of this report, great emphasis is placed within planning policy generally, specifically paragraph 72 of the NPPF, on the need to ensure that a sufficient choice of school places is available to meet the needs of existing and new communities. The NPPF states that Planning Authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. The NPPF further states that Planning Authorities should give great weight to the need to create, expand or alter schools. The Policy Statement – Planning for Schools Development (15 August 2011) also sets out the Government's commitment to support the development of state funded schools and their delivery through the planning system.
41. As outlined in paragraphs 6, 7 & 8 of this report, a number of Schools within Wilmington and the surrounding local area are proposed for expansion at this time. Kent County Council, as the Strategic Commissioner of Education Provision in the County, is responsible for ensuring that there are sufficient school places of high quality for all learners. The applicant advises that this application is proposing temporary classrooms to provide additional teaching facilities to meet the curriculum requirements for the September 2016 pupil intake. Further permanent expansion is proposed under a separate planning application (KCC/DA/0085/2016) which is yet to be determined. However, the applicant advises that the following case of educational need applies to this temporary accommodation proposal as well as the permanent proposals.
42. As set out by Kent County Council Education, the Wilmington and South Dartford urban areas have been seeing an upsurge in demand for secondary school places. This increase in indigenous demand is caused by changing demographics in the area. In addition, there is new demand from the large and medium scale housing and urban developments which are taking place in the area. This growth is bringing new families to the Dartford Borough requiring enhancements to the infrastructure in order to meet the future needs of the town and its residents. Consequently, there is a forecasted deficit of secondary school places for the Dartford urban area from 2016 onwards. The applicant advises that the forecasts for the Borough of Dartford support the view that without the

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

expansion of Wilmington Academy, the Education Authority would fail to meet its statutory obligations to provide sufficient school places in the area. I am further advised that the Education Authority has given careful study to all the options available and is of the firm opinion that expanding Wilmington Academy is one of a number of school expansions that are necessary within the Dartford area. The applicant considers that if this proposed expansion does not proceed, the deficit of places will worsen because of the limited options for alternative expansions within the wider Dartford Borough area.

43. In summary, the applicant advises that the expansion of Wilmington Academy is proposed due to a number of key factors:
- (1) Increased demand in Dartford town and surrounding areas means that there is very little choice for parents;
 - (2) Wilmington Academy sits very close to the area of greatest need;
 - (3) The size of the existing School buildings is not adequate.
44. Based on the above, in my view, it is evident that a clear case of need for additional secondary school places within Dartford exists. Much of the Borough is within the Metropolitan Green Belt and it needs to be borne in mind that the Green Belt covers a wide area where people live and that these people need local school facilities just as much as those outside of the Green Belt. The applicant has demonstrated that there is an existing shortfall of places within the local area, and a future need which will be further outstripped by demand unless additional places are provided. Support for the provision of school places is heavily embedded in the NPPF and local Planning Policy, and I consider that the need for the development should be given significant weight in this instance.

Alternative Development Options

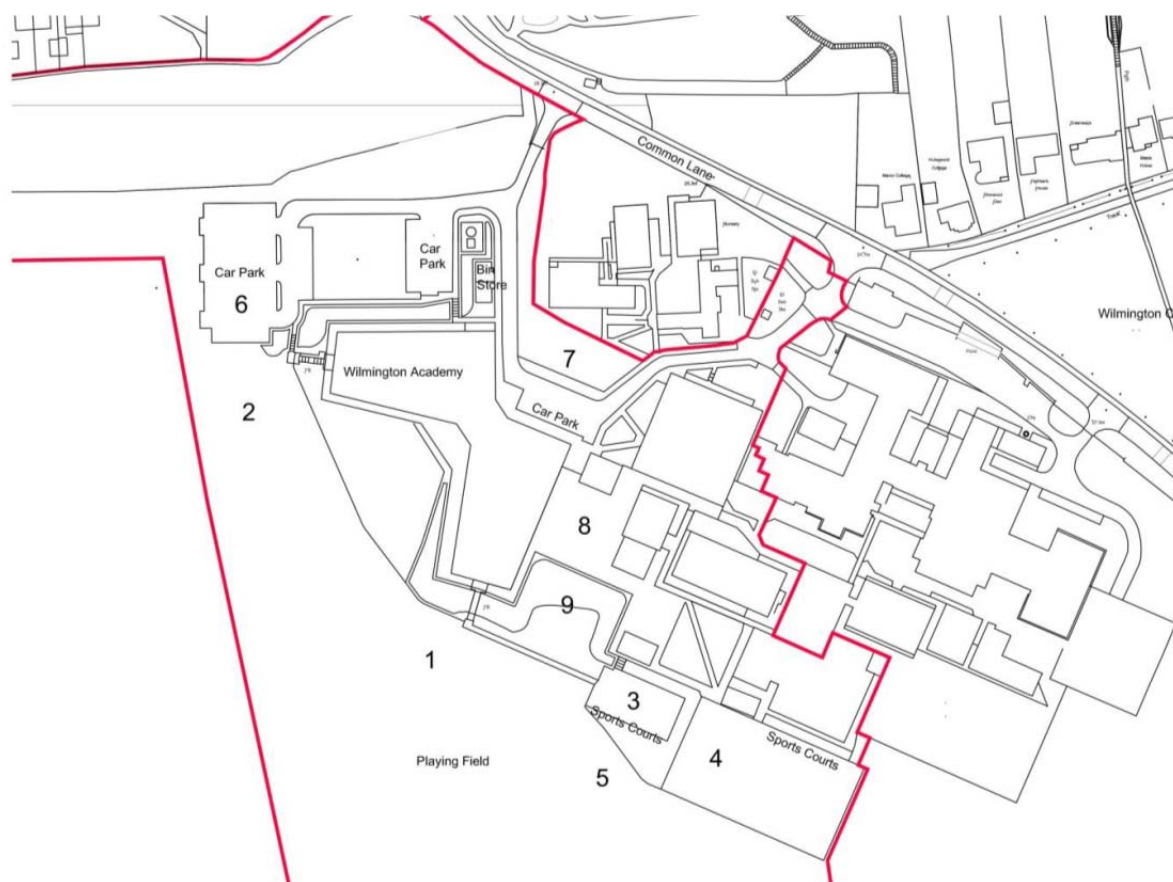
45. As part of the applicant's case of very special circumstances, alternative development options have been assessed and the applicant has concluded that the development as proposed is the only viable option available. Having accepted a need for additional school places within the Dartford Borough, and consequently a need for additional places to be provided at Wilmington Academy (in addition to other local schools) the development options available must be discussed. First, Wilmington Parish Council, Wilmington Safer Streets, the Borough Council Members for the ward of Wilmington and local residents have questioned why the additional school places cannot be accommodated at two nearby vacant school sites, either as new standalone schools or as annexes to the Academy (and/or other local schools).
46. The Area Education Officer was asked to provide a response to the suggestion that the former Rowhill School site in Stock Lane Wilmington and/or the former Hextable School (Oasis Academy) site in Egerton Avenue, Hextable, be used as new school sites or as a satellite for either the Grammar School or the Academy. With regard to the opening of a new school at either site, it is important to note that under current legislation, a new school can only be opened as a free school. In considering this Central Government legislation, it is not considered that a free school could be established and set up in time to meet the urgent demand for places. Further, with regard to the Hextable site, the applicant advises that use of that site was further discounted because the Swanley/Hextable area is adequately served by the Orchard Academy in Swanley. The Hextable site is outside of the Dartford catchment area and, in addition, the most expedient route from Dartford to Hextable is through the village of Wilmington. In any instance, the applicant advises that the accommodation on the Hextable site is dated and would require a multi-million pound refit for it to meet modern infrastructure needs.

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

The setting up of a new school at either site is therefore not practicable within the required times frames due to the Government's Free School initiative, and further the Hextable site is outside of the catchment area that it would need to serve.

47. The site of the former Rowhill School in Stock Lane, Wilmington, is within the catchment area for Dartford. Whilst it could not be established as a new school for the reasons outlined above, its use as an Annexe needs to be considered. The applicant advises that the buildings on that site were last used approximately 5 years ago as a Pupil Referral Unit and before that as Rowhill Special School. There are two main single storey buildings on the site, one built in 1973 and one in 2001, with a site size of 1.48 hectares (3.66 acres). The applicant considers that there are three reasons why the site would not be appropriate as a satellite. First the existing buildings and building footprint do not lend themselves to secondary school use, having been designed originally to facilitate special school education. The applicants accept that the buildings could conceivably be adapted for *primary* aged pupils but that it would be expensive to adapt or rebuild the facilities for *secondary* use. Secondly, two alternative uses for that site are currently being considered, which are to retain it for use as a new primary Free School or to sell the site for a capital receipt. Thirdly, to use that site as an annexe would see the constant movement of students between the two sites, making it unnecessarily operationally inefficient.
48. Other concerns with using the site as an annexe are the sustainability issues of having two administration bases, the need for costly duplication of facilities such as the canteen, sports facilities and specialist teaching accommodation, and the potential need for students to be transported between the two sites several times a day. In summary, it is considered that the site would not lend itself to secondary education as an annexe for the reasons outlined above, and would not be a workable solution for either the Academy or the Grammar School. Under the circumstances, I accept that the Rowhill site does not offer a workable or deliverable alternative to the current proposal.
49. Having accepted that offsite alternatives are not practicable, development options within the existing Academy site must be considered. Although the whole of the Academy site is within the Green Belt, arguably development in some areas of the site would have a lesser impact on the openness on the Green Belt than others. Dartford Borough Council object to this proposal and request that the applicants consider a revised siting of the temporary classroom buildings to a location elsewhere within the Wilmington Academy site, in order to minimise the impact on the openness of the Green Belt. However, the applicant advises that alternative sites within the academy grounds were considered, as shown on the map below.

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)



50. Site 1 on the map is the proposed location of the temporary classrooms buildings, and sites 2 through to 9 are the alternative locations considered. The applicant advises that the possible alternative sites were discounted for the following reasons:

“Site 2 - Existing wildflower meadow, conditioned as part of a previous planning approval with tree to the centre and a steep topography. Unsuitable for selection.

Site 3 - Existing hard ball court. Loss of hard play space and sport facility unacceptable.

Site 4 - Existing hard playground and sports courts. Loss of hard play space and sport facility unacceptable.

Site 5 - Future proposed expansion to hard ball court (separate application) which would also be utilised as the main contractor compound for the main expansion development (separate application) – selection would restrict ability to construct main expansion proposal (should permission be granted) therefore selection unacceptable.

Site 6 - Existing car park. Selection would result in loss of significant number of car parking spaces and therefore selection is unacceptable.

Site 7 - Grass slope to the front of the school. The area is identified to accommodate a bus pull in bay for 2 buses as part of this application therefore selection is unacceptable.

Site 8 - Area of existing hard landscape between existing buildings. Area was considered but due to the proximity of existing buildings, access points and the location of the proposed main expansion (separate application) it was determined that temporary buildings in this location would be difficult to remove once construction for the main block was underway and even when double stacked to reduce footprint would require more space than that was available. Therefore selection is unacceptable

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

Site 9 - Existing grass spoil mound from previous development with areas of adjacent existing hard landscaping. This location is the proposed site for the main expansion development (subject to separate application) and is therefore unacceptable as it would prevent the construction of the proposed teaching block in this area (should permission be granted)."

51. The selection of location 1 is considered by the applicant to be not only the least intrusive location within the academy site, and also the only available and practicable location. Temporary buildings in the location proposed could be installed/removed with minimum disruption to the daily school activities, and the siting would also enable works to proceed on the main expansion scheme, should permission be granted. The proposed siting is also adjacent to an existing entrance point to the main building providing access to toilets and easy connection to power and data services. Its proximity to the main building would also necessitate only a limited extension of the existing fence line to bring the temporary classrooms within the secure boundary line of the school line. Further, the proposed siting would have no impact on existing trees and/or planting, a minimal impact on playing field provision (discussed later in this report), limited visual impact and would also not adversely affect the amenity of properties surrounding the school site.
52. In light of the above, I consider that the applicant has considered all reasonable alternative sites within the Academy grounds, and accept that the proposed location of the temporary buildings is, in the circumstances, the most viable option. However, the impact of the proposed temporary buildings on the openness of the Green Belt needs to be considered and assessed.

Impact on the Openness of the Green Belt

53. As referenced by Dartford Borough Council, this application proposes development that would encroach into the Green Belt, which could harm its openness. First, it is important to note that the site is well screened from public views by the existing academy buildings, and mature boundary planting and screening. However, openness of the Green Belt is described as an 'absence of development' irrespective of the degree of visibility of the land in question from public vantage points. Therefore, any physical development within the Green Belt, whether visible or not, would have some impact on the openness. Whether that impact is either acceptable or unacceptable is a matter of fact or degree based on the specifics of each case.
54. The proposed temporary classrooms would occupy a compact footprint and would be sited adjacent to the existing academy building, minimising encroachment into the undeveloped areas of the site. A reduction in the number of classrooms proposed from six to three has further reduced the development footprint over that originally proposed, and kept the amount of built development proposed to a minimum. The single storey buildings would be of a limited size and scale, and would be required to be removed from the site by the 1 September 2017 if permission is granted. I consider that alternative locations within the school site that could be argued to have a lesser impact on the openness of the Green Belt are not available or suitable to accommodate the temporary buildings and, in my view, the proposed location of the development would in fact have a very limited impact on the openness and functioning of the Green Belt. The contribution made by the academy site to the wider Green Belt would, in my view, be maintained by the proposed development, with the open areas of the site retained to the

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

south and west, and built development contained to the north and east where it adjoins the built development of Wilmington and Dartford beyond.

Summary – Very Special Circumstances/Green Belt Considerations

55. Overall, I accept the applicant's assessment and application of Green Belt Policy as set out in the submitted documentation, and I have considered this in the context of the Development Plan Policy and the NPPF. The development is inappropriate development for the purposes of Green Belt Policy consideration and is, therefore, by definition potentially harmful. Nevertheless, in my view, the considerations summarised above are sufficient collectively to constitute 'very special circumstances' capable of outweighing harm, in this particular case. Furthermore, I accept that the particular siting and design of the proposals has been carefully considered to help mitigate the impact of the development on the functioning and openness of the Green Belt. Accordingly, I do not consider that an objection on Green Belt grounds would be warranted in this particular case.
56. Further, in assessing the need to refer the application to the Secretary of State for consideration, and having regard to the Town and Country Planning (Consultation) (England) Direction 2009, I do not consider that this application needs to be referred. The Direction requires inappropriate development to be referred where it consists of the provision of buildings where the floor space to be created is 1000 square metres or more, or any other development which, by reason of its scale or nature or location would have a significant impact on the openness of the Green Belt. The proposed temporary buildings have a combined total floor space of 210 square metres, well below the 1000 square metre threshold. Further, given the temporary nature of the development and the limited impact that the development would have on the openness of the Green Belt due to its limited size and scale, and location adjacent to existing built development, I consider that there is no requirement to refer the application in this particular case.

Access and Highway Matters

57. As outlined in paragraph 34 of this report, there is substantial local objection to this application, and to the principle of expanding the Academy and other Schools in the immediate vicinity, based primarily on highway safety grounds and access concerns. Wilmington Parish Council, Wilmington Safer Streets and the two Dartford Borough Council Members for the ward of Wilmington (Cllr Hunnisett and Cllr Lampkin) also raise strong objection to this application on the same grounds (in addition to the application for permanent development at the Academy and the two proposals of Wilmington Grammar School for Girls (WGSG)). As set out in more detail within the earlier sections of this report, the primary points of concern and objection relate to a lack of capacity of local roads, and highway and pedestrian safety.
58. Many of the objections relate to the principle behind the permanent expansion and the wider implications of the proposed expansions of other Schools within Wilmington. As outlined in paragraphs 6 & 7 of the report, the County Planning Authority are currently in the process of considering applications for permanent accommodation to facilitate expansions of both Wilmington Academy and Wilmington Grammar School for Girls. Both of those applications have met with significant local objection on access and highway safety matters, in addition to concerns and points of objection raised by Kent County Council Highways and Transportation. The applicant is in the process of considering further potential mitigation measures in an effort to address those concerns and objections, which would be subject to consultation with statutory consultees and the

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

local community when submitted. Those applications for permanent development would have to address in detail the impact that a permanent expansion would have on the local highway network, and mitigate any such impacts. Local objections relating to the need for speed limit changes, weight restrictions, additional onsite car parking, parking restrictions in local roads, and the removal of buses from Common Lane would all be considered and addressed in the determination of those permanent applications. Those applications will be determined on their own merits in due course and would not be pre-determined by a decision on this application.

59. This application is proposing to provide three temporary classrooms to accommodate the September 2016 additional pupil intake and previous intakes over and above the 6FE original pupil admission number (PAN) of 180 pupils per academic year. The applicant advises that that equates to an additional 184 pupils over and above the 950 capacity of the accommodation approved under application reference DA/12/14, with a projected school roll of 1134 in September 2016. Therefore, in determining this application, the impact of an additional 184 pupils needs to be considered and addressed. It should also be borne in mind that the temporary classrooms would be required to be removed from site on or before 1 September 2017. Future intakes beyond 2016 are therefore not relevant to the determination of this application.
60. As can be seen from the Highway and Transportation comments set out on paragraph 27 of this report, when originally submitted this application met with objection from Highways and Transportation due to highway safety and capacity concerns. As outlined in paragraphs 9 through to 12 of this report, as a result of the Highway and Transportation objection, and the significant objections from the local community including the Parish Council, the applicant spent a considerable amount of time discussing the proposal with Highway Officers in an effort to identify improvements that could be made to improve the safety of pedestrian access and to help ease the congestion on Common Lane. Two separate packages of mitigation measures were submitted as a result of these discussions (set out in detail in paragraphs 20 to 25 of this report), and collectively these will be discussed and outlined below.
61. First, an onsite footpath link is proposed to be created to link the Academy site with PROW DR118A at its western end adjacent to Tredegar Road. The route between the academy building and the point where it joins the PROW would measure 215metres (704ft), in comparison to a 335metre (1098ft) route from the academy building to the same point on the PROW but via Common Lane. Pupils from the Academy and WGSB would be encouraged to use the proposed onsite footpath link to the PROW as opposed to accessing the PROW via Common Lane. In addition, the applicant has confirmed that the footpath link would be accessible for use between the hours of 0730 and 0930 on term time mornings and between 1430 and 1630 on term time afternoons. I am further advised that the route would be available for use by pupils of other local schools, including those at Wilmington Primary School. It should be noted that the provision of this onsite link and its availability for use by other schools has been welcomed by the local community.
62. The applicant has demonstrated that the provision of the onsite footpath link would reduce the number of pupils using the footway on Common Lane to below the current level of use. Reducing the number of pupils using the footway on Common Lane is a key factor in mitigating the impact of this proposal due to the existing safety issue of buses mounting that stretch of pavement to pass each other. Any reduction in its use is welcomed. Further, PROW DR118A is proposed to be surfaced with a compacted aggregate, with timber barge board edging, to match that of the proposed onsite

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

footpath link. It is also proposed to widen approximately 70 metres of the existing footway at the junction of Common Lane and Parsons Lane, extending south on Common Lane towards the academy entrance. Both of these latter mitigation measures would ease the use of PROW DR118A, with surfacing encouraging use during more inclement weather, and removal of vegetation and widening of the footpath on the Parsons Lane/Common Lane junction not only providing a wider and safer footpath, but allowing a much improved visibility splay for those students who cross Common Lane to join PROW DR118A as its eastern end. The County Council's Public Right of Way team support this application but, should permission be granted, an informative is required to advise the applicant of the requirement to seek relevant approvals from the PROW team with regard to undertaking works to the PROW.

63. In addition to the above initiatives proposed to mitigate the impact of additional pedestrian movements, the applicant has also proposed to provide two additional dedicated bus bays within the academy site to separate bus and car drop off areas (currently combined) to create a freer flow of traffic onsite. Further, and as requested by the local community, the existing car pupil drop-off/pick-up area, which is currently only open during the morning peak, is proposed to be made available for use during the afternoon peak period, and would be managed by academy staff. Both of these measures would ease traffic movement within the site, minimising queueing at the site entrance back onto Common Lane, and would remove waiting vehicles from Common Lane in the peak afternoon period.
64. Lastly, the Academy has updated its School Travel Plan and signed up to initiatives and commitments to improve pedestrian safety. The Academy (and WGSG) have committed to monitor inappropriate parking by parents in the area at the beginning and end of the school day, to oversee pupils crossing Common Lane to access PROW DR118A, and to collaborate with surrounding schools and local bus operators to better manage and coordinate bus movements. In addition, a joint venture between the Academy and WGSB would manage pupil flows at the existing zebra crossing on Common Lane in order to improve pupil safety and to reduce traffic delays.
65. Highways and Transportation has assessed the appropriateness and effectiveness of the mitigation measures proposed by the applicant, and subsequently have withdrawn their objection to this application. It is considered that the initiatives proposed would improve sustainable access to the Academy and highway safety. This conclusion is based on an assessment of the impact of an additional 184 pupils only, and does not consider any increase beyond that. As discussed earlier in this report, and for the avoidance of doubt, should permission be granted the temporary classrooms would be given a temporary one year permission only. Should the applicant wish to retain the buildings beyond 1 September 2017 an application would need to be submitted which would have to assess the impacts of any additional pupil intake over and above that proposed as part of this application.
66. In this case, I am satisfied that the applicant has demonstrated that the provision of the temporary buildings would not exacerbate existing highway and access matters, including safety concerns, taking account of the mitigation works proposed and in considering that Highways and Transportation no longer raise objection. However, it is clear to me that the proposed mitigation works must be completed and operational prior to first use/occupation of the temporary buildings to ensure that unacceptable impacts on the safety of pedestrians and the operation of the local highway network would not occur. Without the mitigation measures proposed, the development, in my view, would be unacceptable on highway safety and access grounds. Dartford Borough Council are

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

also of this opinion, and request that these matters be secured by appropriate conditions.

67. Therefore, should permission be granted, I consider it appropriate that conditions of consent be imposed requiring all of the mitigation measures proposed by the applicant (as listed above) to be complete and operational prior to first use/occupation of the temporary classrooms. In addition, I consider that further conditions of consent should require the onsite footpath link to be open and available to all local pupils between the hours of 0730 and 0930 and 1430 and 1630 Monday to Friday during term time, and requiring the onsite drop-off/pick-up area to be available for use and supervised by a member of staff during the afternoon peak, in addition to the morning peak. Lastly, a further condition would require the Academy to implement and monitor the initiatives set out within the submitted Travel Plan. In this instance I see no reason to require the submission of an updated Travel Plan as the submitted version is only recently completed and the development permitted, should Members agree with the recommendation, would be for a period of less than 12 months. Subject to the conditions outlined above, and a temporary approval until 1 September 2017, I am satisfied that, in this instance, that the proposal (with the highway mitigation measures) would not have a significantly detrimental impact on the local highway network and therefore see no overriding reason to refuse the application on this ground.
68. I recognise that such a restriction on occupation may cause operational issues for the Academy as the 2016 intake will be starting in September 2016 regardless of whether or not appropriate accommodation is provided. I understand that the Academy have undertaken internal alterations to accommodate the pupils on a temporary basis, which although is not ideal, is the only option available to them in advance of a decision on this planning application. Such internal alterations do not require planning permission and are therefore not under the control of the County Planning Authority. Although the additional pupils will be onsite in September (a decision made by the Education Authority), I consider that as a Planning Authority we must be satisfied that highway safety would not be compromised by development and that development requiring planning permission is in accordance with planning policy and guidance. The provision of the temporary accommodation requires planning approval and therefore it is necessary to assess the highway impacts (amongst other matters) of the additional pupils that the development would accommodate. I am firmly of the view that without the mitigation proposed, the development would be unacceptable on highway safety grounds. Therefore, my recommendation is that all of the mitigation measures must be complete prior to first use/occupation of the temporary buildings.

Playing Field

69. In addition to the Green Belt implications of the proposed siting of the temporary classrooms, as discussed earlier in this report, the impact of the proposed development on playing field provision also needs to be addressed. Dartford Borough Council consider that the proposed temporary classrooms would encroach upon an existing cricket pitch, and further state that the County Council need to ensure that the proposal would not result in the loss of any sports pitches at the Academy. Sport England were consulted on this application, and following the submission of additional information from the applicant with regard to the provision of sports facilities on site, particularly the provision of cricket wicket/pitch facilities, raise no objection to the application subject to a condition requiring the removal of the temporary buildings by 1 September 2017. Although a temporary loss of a usable

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

part of the playing field would occur as a result of the siting of the temporary buildings, Sport England are satisfied that the temporary loss would not have a significant impact on the site's ability to accommodate sufficient cricket facilities for the current school roll. I am therefore satisfied that the development would not have a detrimental impact on the provision of adequate sports facilities at the site, subject to any permission being for a temporary period until the 1 September 2017 only.

Ecological Matters

70. An Ecological Assessment was submitted in support of this application, which has been assessed by the County Council's Biodiversity Officer. No objection is raised to the application, and no further information is required for submission. However, should permission be granted, conditions of consent are required to ensure that the precautionary measures outlined in the Ecological Assessment are implemented during the 'construction' of the footpath link onsite, that works are undertaken outside of the bird breeding season (March to August) unless supervised by an experienced ecologist, and that the provision of additional ecological enhancements (such as bird and bat boxes) be given further consideration. Subject to the imposition of those conditions, I am satisfied that the development would not have an unacceptable impact on biodiversity interests.

General Amenity and Other Matters

71. Other than off-site traffic, highway safety and access matters, the only concerns raised regarding general amenity matters relate to a potential increase in air pollution, and the exacerbation of existing problems regarding anti-social behaviour and the dropping of litter. With regard to design and residential amenity, I am satisfied that the temporary classroom buildings proposed would be sufficiently distant and screened from local properties to avoid any direct adverse impact. With regard to air pollution, I am of the opinion that the small increase in the school roll for the 2016-2017 year only (being considered as part of this application) would have a negligible impact on local air quality and see no reason to refuse the application on this ground. With regard to litter and anti-social behaviour, although regrettable, these matters are outside of the remit of the Planning Authority.
72. The local community also consider that the applications for the expansion of various schools in Wilmington should be considered as a whole, and not dealt with in a piecemeal fashion. However, the County Planning Authority can only process applications for school developments where the County Council is applicant. In this instance therefore, developments at Wilmington Grammar School for Boys and the local Nursery are considered by the Borough Council as the County Council is not promoting the development. Further, the two sites that we are dealing with at County level, Wilmington Academy and Wilmington Grammar School for Girls, are two separate schools and we cannot process one application that spans two sites. The applicant further advises that the need to submit proposals for temporary accommodation in addition to permanent solutions was due to time pressures to provide the temporary accommodation on site for September 2016. The highway implications of these proposals are, however, considered as a whole, and the cumulative impact is considered in the determination of this application, and will be further considered in the determination of the permanent proposals. Staff may have been recruited by the Academy, and a Planning Authority cannot prevent that, but that is not something that affects the planning process or in any way suggests a pre-judgement by the Planning

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

Authority. Lastly, as set out in paragraph 30 of this report, the application (including amendments) has been well publicised and our publicity requirements were not only met but also exceeded in this instance.

Construction Matters

73. Wilmington Parish Council and the local community have expressed concern regarding the construction traffic associated with the development, and request that access by construction vehicles be restricted to avoid peak school times. Given that there are nearby residential properties, adjacent/nearby schools, and a local nursery, I consider it appropriate that details of a full Construction Management Strategy be submitted for approval prior to the commencement of development. That should include details of the methods and hours of working, location of any required site compounds and operative/visitors parking, details of any required lorry waiting facilities, details of the construction access, and details of how the site access would be managed to avoid conflict with peak school times and traffic associated with local schools. Therefore, should permission be granted, a Construction Management Strategy would be required pursuant to condition and the development would thereafter need to be undertaken in accordance with the approved strategy.

Conclusion

74. This proposal has given rise to a variety of issues, including the need to demonstrate very special circumstances to justify inappropriate development in the Green Belt, the impact of the proposed development on the openness of the Green Belt, and the impact of the development on the highway network. I consider that very special circumstances have been demonstrated in this particular case for overriding Green Belt policy considerations. I also consider that the development has been designed to minimise the impact of the development on this part of the Green Belt, and its functioning. In addition, subject to the imposition of the conditions outlined throughout this report, I consider that the proposed development would not have a significantly detrimental impact on the local highway network, or the amenity of local residents, and would accord with the principles of sustainable development as set out in the NPPF. In addition, support for the provision of school places is heavily embedded within the NPPF and local planning policy, and this development would satisfy a required need for secondary school places in the Dartford area. Therefore, subject to the imposition of conditions, I am of the opinion that the proposed development would not give rise to any material harm and is otherwise in accordance with the general aims and objectives of the relevant Development Plan Policies and the guidance contained in the NPPF. Therefore, I recommend that the temporary permission (until 1 September 2017) be granted subject to appropriate conditions

Recommendation

75. I RECOMMEND that PLANNING PERMISSION BE GRANTED SUBJECT TO conditions, including conditions covering:
- the development to be carried out in accordance with the permitted details;
 - the modular buildings to be removed from site and the land reinstated as playing field on or before the 1 September 2017;
 - the submission and approval of the colour finish of the modular buildings;

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

- all highway mitigation (footway widening on Common Lane, provision of on-site footpath link, surfacing of PROW DR118A, and provision of two on-site bus parking bays) to be completed and operational prior to first use/occupation of the modular buildings;
- onsite footpath link to be open and available to all local pupils between the hours of 0730 and 0930 and 1430 and 1630 Monday to Friday during term time;
- the onsite drop-off/pick-up area to be available for use during the morning and afternoon peak Monday to Friday during term time and supervised by a member of staff;
- the Academy to implement and monitor all of the Travel Plan initiatives and review where necessary;
- the development to be undertaken in accordance with the recommendations and precautionary measures set out within the Ecological Assessment;
- the development to be undertaken outside of the bird breeding season (March to August) unless supervised by an experienced ecologist;
- provision of ecological enhancements;
- the submission and approval of a Construction Management Strategy, including details of the methods and hours of working, location of any required site compounds and operative/visitors parking, details of any required lorry waiting facilities, details of the construction access, and details of how the site access would be managed to avoid conflict with peak school times and traffic associated with local schools;

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

- The applicant's attention is drawn to the letter from Public Rights of Way which contains general informatives with regard to works adjacent to and/or on a Public Right of Way. It is also advised that 'the granting of planning permission confers on the developer no other permission or consent or right to close or divert any Public Right of Way at any time without the express permission of the Highways Authority;
- The applicant's attention is drawn to the letter from Highways and Transportation in which it is noted that it is the responsibility of the applicant to ensure that all necessary highway approvals and consents where required are obtained and that the limits of highway boundary are clearly established in order to avoid any enforcement action being taken by the Highway Authority. The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under such legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement;

Case officer – Mary Green	03000 413379
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Background documents - See section heading
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Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

Example representation from Wilmington Safer Streets

Appendix 1

Wilmington Safer Streets - Resident Consultation

Before we began this document we wanted to identify the main aims of Dartford Borough Council. Please see the below text taken from Dartford Borough Council's latest Core Strategy. **We felt the last paragraph was significant to our concerns.**

"This Core Strategy is a significant document for everyone who lives and works in the Borough. Whilst no one could ever claim that it makes light reading what it contains and what it may mean for the future of our community is hugely important. It sets out the approach that a number of partners - particularly those involved in community planning and development control - will take to the challenges ahead. It looks at this community's future needs in areas like housing, transport, leisure, growth and jobs. It seeks to provide a 'routemap' to ensure that the future Dartford we get is the future Dartford we want.

The strategy is not a fixed blueprint. Over time it will flex, change and adapt to different circumstances but the core principles will be the ones that drive our decision-making and policies for the years ahead.

Please don't think that this strategy is all about development and building things. It's not.

Some of its most important proposals relate to things we won't permit - like overdevelopment, excessive burdens on our transport network, poor design and badly thought-out architecture. It rightly places huge importance on public spaces, the dignity of housing that we demand and the need to provide social infrastructure - things like village halls, playgrounds, parks, open spaces and even cemeteries. It also encapsulates my own personal view that a place like Dartford - a rich mix of rural villages and urban centres - should only grow and change at a rate that's supported by local people.

Dartford is your town and its growth, future and character are in your hands."

Jeremy Kite
Leader of Dartford Council

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

Areas of concern that need addressing in the Transport Consultation

Proposed Expansion of The Academy and Wilmington Grammar School for Girls

CONGESTION

Main Causes of Congestion :

- Common Lane is not wide enough in places for buses, coaches and other large vehicles to pass each other, resulting in vehicles dangerously mounting the pavement whilst children and families are walking along it. **See photos L, M and N.**
- Common Lane is not wide enough to allow filter traffic to turn right in to the school entrance at the bottom of the Village Common.
- Insufficient waiting and parking zones on site at schools for parents who wish to collect or drop off their children which results in parents parking where ever possible, no matter if it blocks access routes and causes congestion to other road users. **See photo P.**
- Schools currently restrict parents from entering the Academy to collect their children. At 3pm each day two school wardens are placed at the main entrance to the Academy and their job is to stop parents from parking on site, which leads parents to parking anywhere possible, no matter if it blocks access routes and causes congestion to other road users. **See photo P.**
- Buses and coaches are restricted on their route when trying to turn from Common Lane in to Parsons Lane due to the amount of cars parked across the entrance of Parsons Lane.
- Buses currently collect school children from 'unofficial bus stops' created by the school children. One example of this is a bus that currently collects groups of girls who congregate at the corner of Parsons Lane and Common Lane. This again leads to immense congestion and is incredibly unsafe for the children. Please note to widen these pavements, as suggested, would simply encourage the children to use this area as an unofficial bus stop even more. **The area of the unofficial bus stop is shown in photos A and B.**

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

Appendix 1

- Other roads in the area around the schools are also affected greatly by the traffic and congestion issues. We asked our members to share details of problems in other local roads and got a lot of information back about some key "hot spots":
 - **Edwin Road** (marked with a blue star on the map) is extremely hard to navigate exit safely during school run times due to parents parking on both sides of the road on the section nearest to Common Lane, this means not even a large car is able to pass through, let alone an emergency vehicle. In addition, as you exit Edwin Road onto Common Lane, there's rarely a weekday afternoon when people aren't parked on the yellow lines on Common Lane, near the corners of Edwin Road. You cannot see anything coming up or down Common Lane until you have pulled out into the path of any oncoming traffic, making it almost impossible to exit Edwin road safely.
 - **Tredegar Road** (marked with a red star on the map) is also affected. Parts of Tredegar Road are very narrow and traffic has increased along here since the last expansion of the Academy so we envisage this will continue to become more of a problem. The road is used as a cut through and speed, especially along the narrow sections is a real problem. Cars and vans regularly mount the pavement to pass cars coming the other way. Tredegar Road is also used as a cut through for students walking to the bus stop at home time, due to the narrow pavements they spill onto the road and into the paths of parents rushing to pick up their own children, resulting in hooting and swearing.
 - **Wilmington Court Road** (marked with an orange star on the map) is used as a cut through and speed along here is a concern among residents.
 - **Broad Lane** (marked with a green star on the map) is also affected, parents and students park there, adding to congestion and often parents arriving for pick-up and drop-off times park across driveways. Students parking here all day prevent home owners parking outside their own homes, a problem which will only get worse with increased students in the area.

COMMUNICATION

- Schools need to increase the flow of information and communication between themselves with regards to the congestion and parking issues created by the parents, coaches, buses and 6th former parking.
- Schools need to communicate more with local residents on local issues created as a direct result of the schools.
- Schools need to give advance warning to local residents when traffic is expected to be increased out of normal school hours. E.g. local residents are not given prior warning when the schools have open evenings, which grinds the whole village to a halt due to the parking of the prospective parents for all three schools along Common Lane and surrounding areas between and 6 and 8pm.

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

SAFETY

Currently Common Lane is very unsafe for its users and Kent County Council need to address the following issues:

- Coaches and buses mounting pavements to pass each other, which is dangerous to the school children and other pedestrians. There have been several instances of buses hitting children in accidents that have miraculously not resulted in serious injuries. One Academy pupil was recently hit by a bus as she walked along the pavement on Common Lane. **See photos L, M and N.**
- Speeding trucks that use Common Lane as a cut through to the various construction industry businesses in the area, including the aggregate and concrete supplier on High Road Wilmington, and some of the businesses located in the industrial park off Powder Mill Lane to the East of the village. These vehicles are enormous and are thundering past very young children, just inches away, at speeds inappropriate for the road.
- Lack of safe and secure crossings for the school children and pedestrians.
- Lack of signage about safe parking, and lack of school crossing signs (the ones that exist are largely obscured by foliage, **see photo J**).
- Lack of safe places to stop and wait whilst collecting children from school.

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

ENVIRONMENT / PUBLIC HEALTH

Observations and Existing Concerns:

- Concerns over the length of the expansion projects and lack of parking on site for contractors, which will overflow on the already strained parking we have in the village.
- Concerns over an increase in nuisance behaviour by students to and from the schools, with the increase in numbers.
- A high percentage of children attending these schools are not local and therefore will be driven to and from school which means a further increase in car pollution/carbon emissions in our local area.
- Smoking and associated litter by school children (see photo V). Litter is currently a big issue, even without the expansion, and needs to be addressed. The woodland from Tredegar Road is used as a walkway to and from the bus stops and schools by pupils and an easy place to drop their litter en route, particularly as there is only one (very unstable) bin in this area (see photos D and F). The level of local litter has reached the point where the Parish Council have organised a volunteer clean up session in March.
- Rude and aggressive behaviour of parents collecting their children when challenged for their unsafe parking by pedestrians or residents, with little support given by the schools.
- Losing the 'village feel' by allowing this expansion, any changes to improve safety need to be made sympathetically in order to keep the village feel of Wilmington and prevent it turning into a "campus" for local schools.
- The last expansion of the schools was completed in July 2014, can we have an assurance there will be no more expansion in future?
- Lack of support and acknowledgement by Dartford Borough Council and Kent County Council regarding local resident parking issues in the past and present, let alone with the proposed new expansion. Currently any parking restrictions are not enforced at all, the parking wardens have only attended once since September 2015 despite numerous complaints from residents. Parking restrictions simply do not work without enforcement.
- Poor parking across pavements which leave pedestrians with young children and buggies no option but to walk into the road – see photos Q and R. Poor parking has led to the deterioration of the grass on our village Common, as pedestrians are forced to walk on the edge of the Common in order to pass the cars blocking the pavements – see photos S, T and U and V.
- Gangs of children waiting on the edge of the village Common, again ruining the grass.

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

- Schools need to accept responsibility and act towards a solution when residents make them aware of issues. Complaint emails have been ignored in some cases. Extract taken from "Home to school travel and transport guidance- Department for Education - Statutory guidance for local authorities":

"July 2014 - Poor behaviour on school buses/other modes of transport

47. The department expects each school to promote appropriate standards of behavior by pupils on their journey to and from school through rewarding positive behaviour and using sanctions to address poor behavior. The EIA 2006 empowers head-teachers to take action to address unacceptable behaviour even when this takes place outside the school premises and when pupils are not under the legal control of the school, but when it is reasonable to do so. In the department's view, this would include behavior on school buses, or otherwise on the route to and from school, whether or not the pupils are in school uniform."

SPECIFIC PARKING ISSUES THAT NEED ADDRESSING AND HAVE BEEN RAISED ALREADY WITH KENT COUNTY COUNCIL

- Persistent stopping and parking on the triangle piece of pavement outside Wilmington Day Nursery. See photo O.
- Persistent parking across the public footpath entrance that leads to Tredegar Road. See photo D.
- Parking at the entrance of Parsons Lane, increasing congestion and making the area unsafe. See photos B and C, which show the areas where parking is a problem.
- Persistent unsafe parking and stopping over local residents private access roads - which violates Highway Code 243:
DO NOT stop or park:
I.anywhere you would prevent access for Emergency Services
II.in front of an entrance to a property

RESPONSIBILITY

- Schools need to acknowledge responsibility of their pupils and the associated issues that we incur as residents by their presence. Litter, parking, congestion etc. Schools frequently ignore emails from residents and do not address the issues we have raised previously.
- Schools need to educate their 6th form students on safe parking, these students have often only just passed their test and frequently park in unsafe places which directly affects pedestrian access in the village. This needs to be addressed and advice given to

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

the students on where to park when attending their school. This needs to be done each year.

- Schools need to educate the parents of the pupils on where is safe and appropriate to park, collect or wait for their children.
- Schools need to increase available parking on site for parents at collection and drop off times. Currently two stewards from the Academy do not allow parents on site for the afternoon collection. This is unfair on local residents and needs to be addressed as it increases the chance that those vehicles will sit and wait in unsafe and nuisance places.

POLICE

- After complaints from local residents regarding the numerous issues we face, the local police suggested a police presence for 1 hour each week on the village Common to assist with issues. Currently a police van with two PSCOs park around the village Common from 10am-11am every Tuesday, perhaps one of the quietest times of the week. When questioned why they were not able to attend at the time of the reported issues (between 8 and 9am or 3 and 4pm) we were told that resources wouldn't allow that.
- This leads us to think that the police are not properly engaging with the schools or the local residents on these issues as the police are even present on the Common during schools holidays, which seems a waste of local resources when clearly there are no issues at these times as the schools are closed.

WILMINGTON SAFER STREETS' SUGGESTED SOLUTIONS TO THE ABOVE ISSUES

- We would ask that instead of filling the village with fixed bollards, which we feel will ruin the look and feel of our pretty village, Kent County Council should place raised flower beds outside of Wilmington Day Nursery where the parents constantly park on the triangle piece of pavement alongside the zig-zig lines on the main road. **See photo O.**
- An additional pelican crossing to be added by the Primary School, this would provide safe crossing and also alleviate the congestion at the other crossing further along Common Lane. This would also mean that traffic further up the hill would not be held up as frequently as it currently is. **See point 13 on the map.**
- Where parking is currently permitted on the Common - place marked parking bays for safe kerb parking - 50% on the curb and 50% on the road. This will ensure enough room is left for pedestrians to walk safely along the pavement. It will also encourage safer parking. **See photos X and Y for an example of this in another borough.**

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

Appendix 1

- Place double yellow lines on any part of the pavement where dedicated kerb parking bays will not work, there is one particular piece of pavement used as a parking space and pedestrians are left with no alternative but to walk in the road - see photos Q and R.
- Ensure consistent and effective enforcement of parking restrictions. At present yellow line restrictions are not enforced at all and any future additional restrictions will need proper policing/enforcement. Dartford Borough Council needs to take responsibility for this.
- Upgrade and move the barrier which is placed at the start of the public footpath leading to Tredegar Road. See photos D and F. The barrier currently sits back from the road and this allows cars to park and sit and wait in front of it, we would suggest moving this barrier nearer to the road. By reducing the amount of space at the mouth of the footpath, you will stop cars being able to park in this very dangerous and congested spot.
- Re-route the coaches and buses to make their journey as efficient as possible and reduce congestion.
- Reduce the speed of traffic by adding speed calming solutions as the current speed bumps are not working and are poorly maintained. See photos E and F. We think a 20mph speed restriction is needed along Common Lane.
- Place double yellow lines all the way up Common Lane from the private road to Parsons Lane, as this currently has no restrictions and unless policed, parents will start to park here going forward and have done so in the past when attending open evenings.
- Place white deterrent lines across the private access road entrance on Common Lane to signify the access route to properties. See photo W for an example.
- Create a drop-off and pick-up site for parents away from the village on Oakfield lane, where there is no residential housing and the road is wider.
- Create a coach park/drop-off on Dartford Heath or on site at the Girls Grammar School.
- Current bus stops need reviewing and the 'unofficial bus stops' should not be permitted. Children should be walking to safe official bus stops away from Common Lane, not congregating in large groups on narrow pavements.
- Increase the amount of litter bins on the Common and in the woodland.
- Carry out a structural check on the old wall that runs up the hill on common Lane on the border of WGSG land. See photos G and H.

Having attended the evening consultation at the Academy in February we were impressed with some of the solutions proposed, although any changes absolutely have to be made in keeping with the village feel of Wilmington. Any additional pathways or walkways would have to be designed appropriately to avoid any future issues – such as creating places where anti-social behaviour and littering would be likely. Any street “furniture” would need to be in keeping with the village and where possible historical features, such as the old walls along Common Lane, should be retained.

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

Map and photos of key locations on Common Lane, Wilmington



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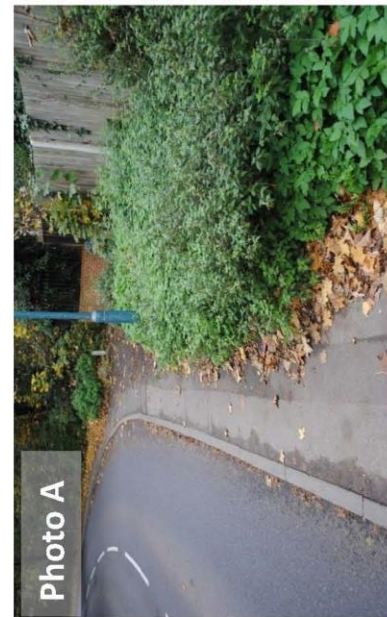


Photo A

Point 5 on map
On this narrow section of pavement just off Parson's Lane an "unofficial" bus stop operates for pupils for the Girls' Grammar school. Photo A shows the view towards the corner of Parsons Lane where parents park and block buses causing traffic to come to a standstill.

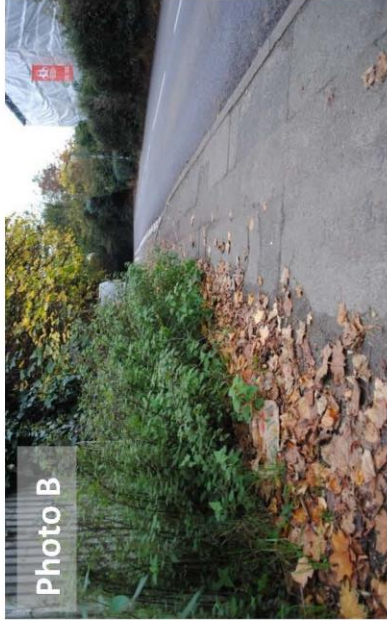


Photo B



Photo C

Point 6-7 on map
Looking from Parson's Lane towards the blind corner. From this point onwards until the Common the road is not wide enough for 2 buses, or other large vehicles, to pass.



Photo D

Point 7 on map
Just after the blind corner is the access to the alleyway leading through the woods to Tredegar Road. That bin is frequently tipped over by kids/wind/or people moving it to park across the alleyway entrance. Consequently litter is strewn across the road and woods. Parents frequently use this to park, churning up the mud and making it slippery and dangerous as well as blocking the entrance to the footpath.

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)



Photo F



Photo E

Point 7 on map

The speed bumps are poorly maintained and ineffective to large vehicles, particularly the large plant vehicles travelling through the village.

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)



Photo G

Point 7-8 on map

The pavement is only on one side and is extremely narrow. Buses mount the pavements here, but even when they don't they are travelling at 30mph or more within inches of small children, families and secondary pupils. Heavy construction vehicles also travel along this section at speed.



Photo H

Point 8 on map

You can see here how narrow the pavement is and how narrow the road is.



Photo J

Point 9 on map

Signage is almost entirely obscured by overgrown foliage. The double yellow lines stop here and parents do, inexplicably, park on this section of road causing massive congestion in the area. In Photo H you can see how close buses come to pedestrians, in this instance the bus had pulled slightly over the centre of the road to avoid hitting the pedestrians.



Photo K

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Photo M

Point 8 on the map
 These photos are just 4 of many taken by parents and residents. This is a daily occurrence during term times. In every one of these photos you can see children walking along pavements as buses brush past them.



Photo L



Photo N

Item D2

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

Appendix 1



Point 12 on the map
Parents park on both sides of the road on yellow lines causing chaos.



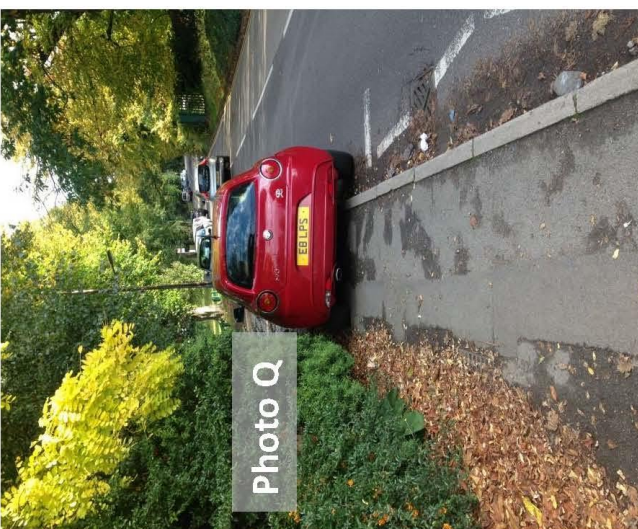
Point 10 on the map
Parents park on the pavement to avoid the zig-zags, this obscures the view for children crossing and is illegal and dangerous.

Item D2

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

Appendix 1

Point 10 on the map
.Sixth formers and parents frequently park on this section of pavement leaving no space at all for pedestrians and forcing them to walk into the road.



Item D2

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

Appendix 1

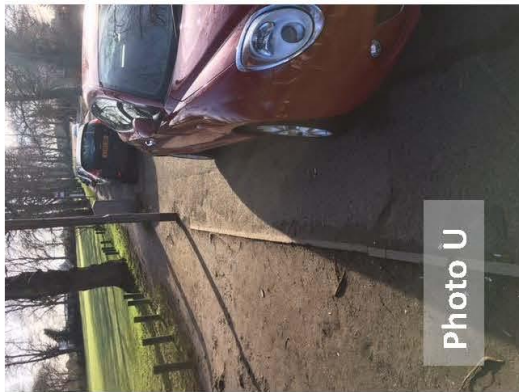


Photo U

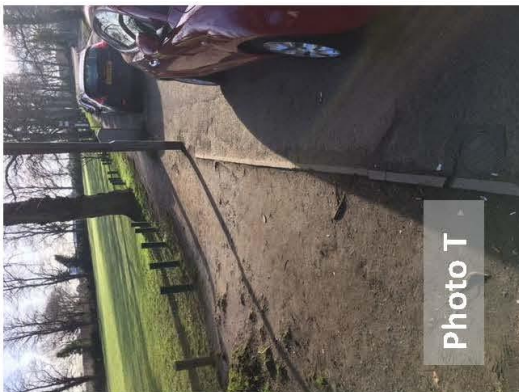


Photo T

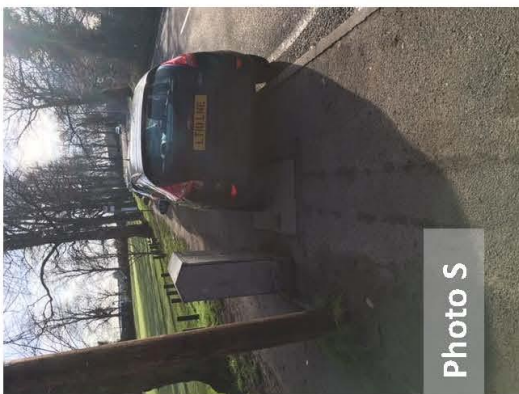


Photo S



Photo W

Point 11 on the map
These photos show the deterioration of the Common due to pedestrians having to walk along the edge as the pavement is blocked by cars.

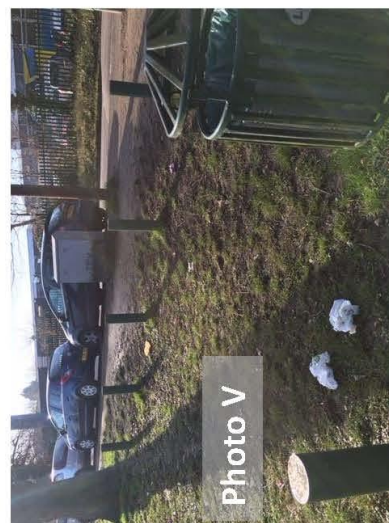


Photo V

Item D2

Three temporary classrooms and associated access improvements to accommodate the 2016/2017 allocation of pupils at Wilmington Academy – (KCC/DA/0088/2016) (DA/16/799)

Appendix 1



An example of allocated kerb parking bays.