

Single storey extension to accommodate eight new classrooms and ancillary spaces at Temple Hill Primary School, St Edmund's Road, Dartford – DA/16/01732/CPO (KCC/DA/0222/2016)

A report by Head of Planning Applications Group to Planning Applications Committee on 7th December 2016

Application by Kent County Council Property and Infrastructure Support for demolition of two temporary classrooms and the construction of a single storey extension to accommodate eight new classrooms (including a SEN room), a group room, staff work base, office, plantroom, storage and toilet facilities, and reconfiguration of car park to increase the number of parking and cycle spaces. Temple Hill Primary School. St Edmund's Road, Dartford – DA/16/01732/CPO (KCC/DA/0222/2016)

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

Local Member: Mr T Maddison

Classification: Unrestricted

Site

1. The application site relates to Temple Hill Community Primary school in Dartford, to the north-west of the town centre. Within the primary school site, there is an attached nursery school; St Anselm's Catholic Primary School also borders the site to the south east. The school is within a predominantly residential area and is largely surrounded by residential properties; a mixture mainly of two storey houses and flats. There is a large scale housing development taking place to the west of the site.
2. The school site totals 3 ha (approximately 8 acres). The buildings are of a sprawling layout comprising both single and two-storey flat-roofed buildings. All of the primary school buildings and the attached nursery are situated to the north of the site, approximately 30m (98ft) from St Edmund's Road. There are currently two mobile classrooms which sit on the playing field to the south of the main school building.
3. Main vehicular access is from St Edmunds Road, which runs adjacent to the northern boundary of the site. Pedestrian access is available in four places; adjacent to the main vehicular access on St Edmund's Road, to the east of the school site, and in two places at the end of Hilltop Gardens Road which lies to the west of the site. The current school car park has 60 car spaces, as well as 16 cycle hoops and a bike shelter containing 10 bicycle spaces.

Background

4. The Commissioning Plan for Education Provision in Kent 2016-2020 indicates that there is a need for new school places in the Dartford area. This is due to a combination of significant house-building in the area and a birth rate which is higher than both the national average and the rest of Kent. The need for school places, particularly at Reception Year age, is not predicted to lessen over the forecasted period.
5. The current school roll is 682; 630 school age pupils plus 52 nursery children. As a result of the need for additional primary school places in the area, KCC Education is

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proposing to expand the school from 3FE to 4FE, increasing the total school roll to 892 (inclusive of 52 full time equivalent nursery children).

Recent Planning History

6. The most recent planning permissions are as follows:

DA/15/514	New single storey extension to provide 3 No additional classrooms with toilet facilities, storage and plant room together with associated external works
DA/13/1544	Planning renewal for three existing mobile classroom units
DA/08/849	Renewal of planning application for mobile units
DA/06/525	An extension to the existing nursery to cater for children up to age 8
DA/05/162	Erecting ball stop fencing to two sides of a tarmac play area
DA/02/1221	Proposed building and play area for Sure Start.

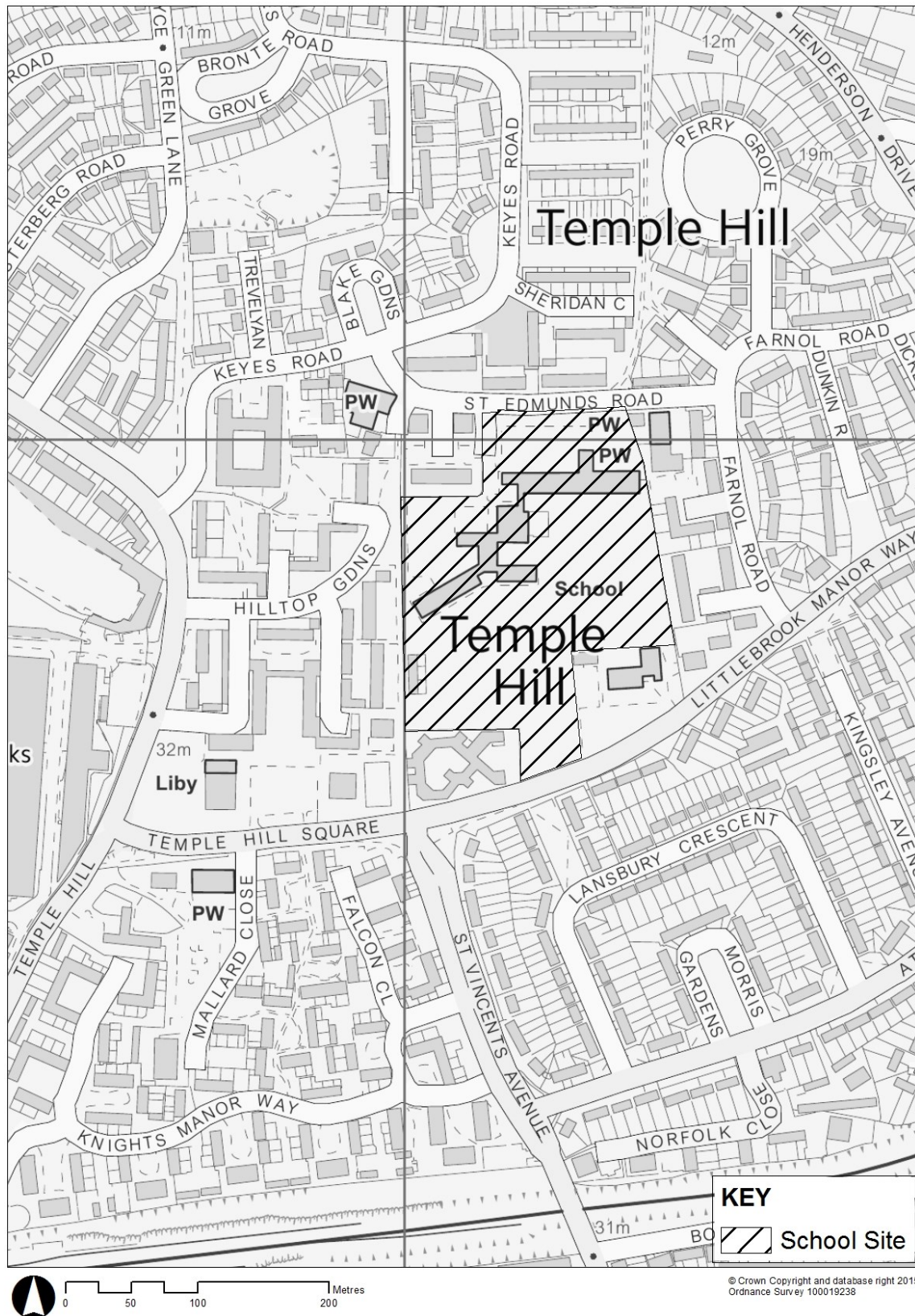
Proposal

7. The current proposal is for the demolition of the two existing mobile units and the construction of a new single storey extension. The extension would be linked to the south elevation of the existing school building, where the existing entrance doors to the school playing field are via a single storey corridor.
8. The gross external area of the proposed extension totals 1000m² (10763ft²). It would contain 8 new classrooms, including a SEN room. It would also contain a room for group working, a staff room, office, plant room, storage and toilets. Whilst the whole extension would be a single storey structure, the link and corridor zone would be of a slightly lower height than that of the classroom block.
9. The proposed extension is essentially a modernised version of the existing school design; employing a flat roof and mostly red-brick cladding. The north elevation and the link corridor would use dark timber cladding in places, similar to what is used below the windows on the existing school building.
10. The classroom block would accommodate the school's expansion from 3FE to 4FE; an increase in pupil numbers from 682 to 892. This increase would be phased; with the addition of one form per year over a period of 7 years. In order to support the increase in pupil numbers it is anticipated that an additional 14 members of staff would be required, increasing the number of staff from 92 to 106.
11. The proposal includes the introduction of 10 new car parking spaces, which includes 3 disabled bays. The current bicycle hoops would be moved to a more suitable location and provision for an additional 34 bicycle spaces would be made.

Item D3

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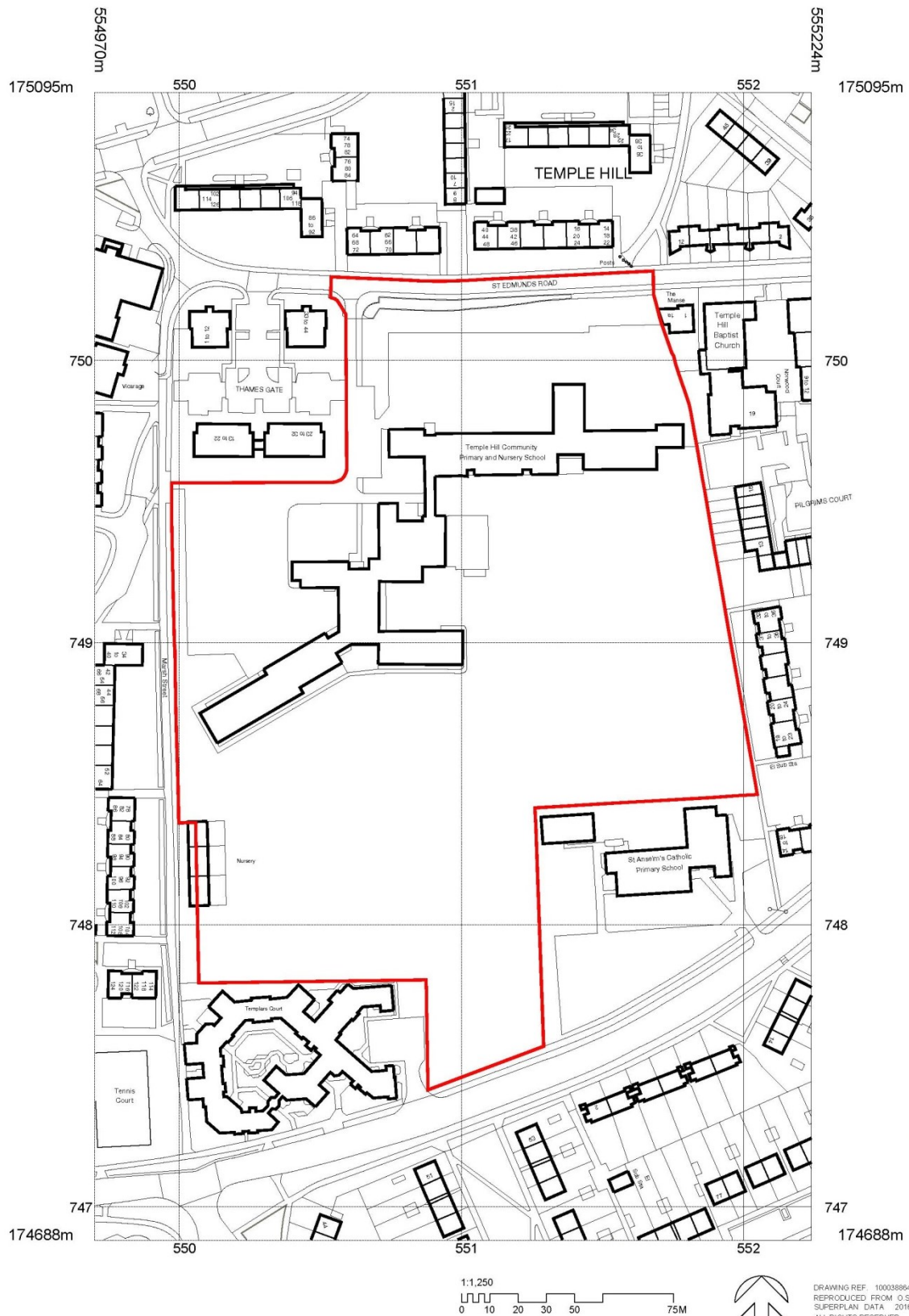
Site Location Plan



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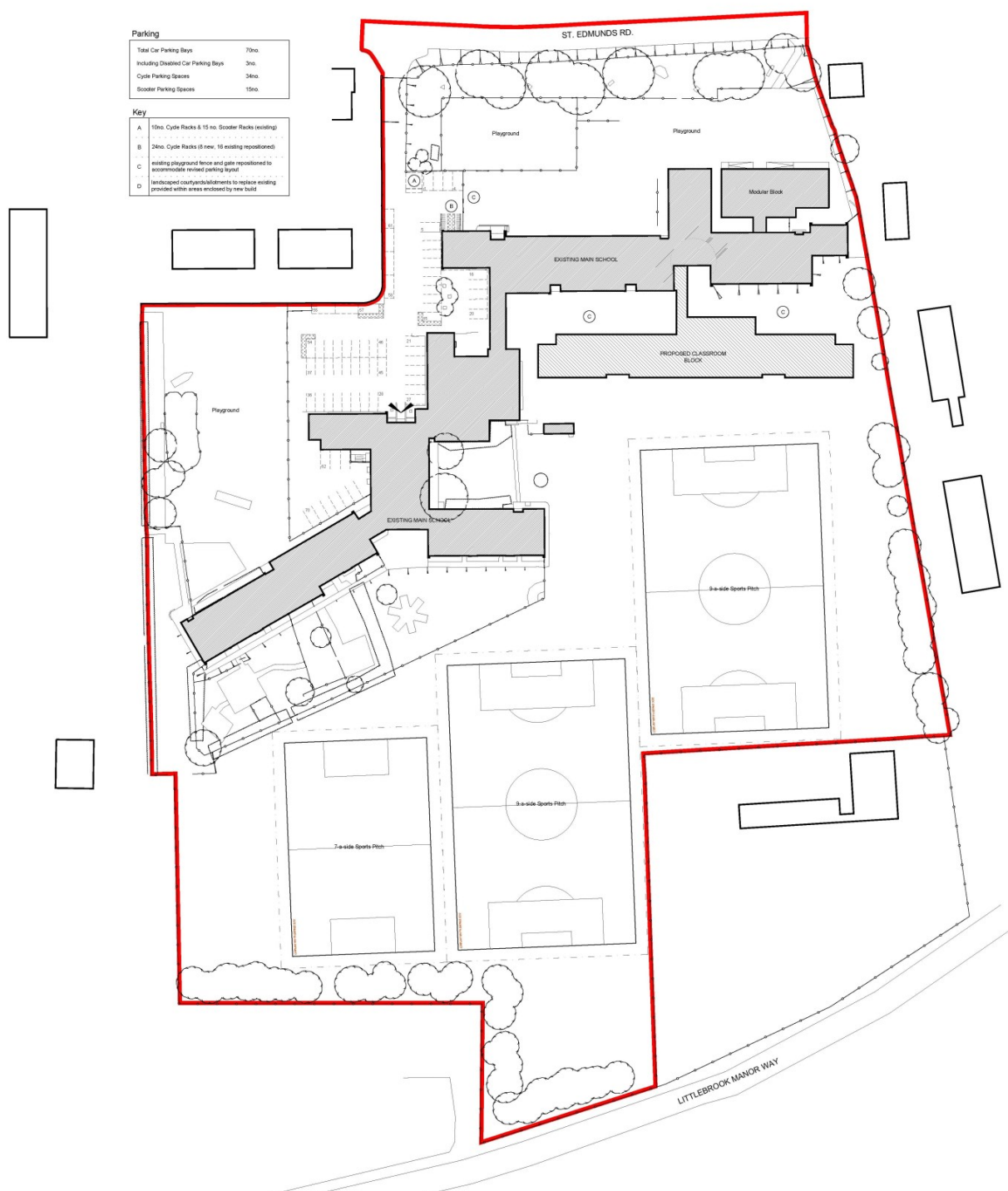
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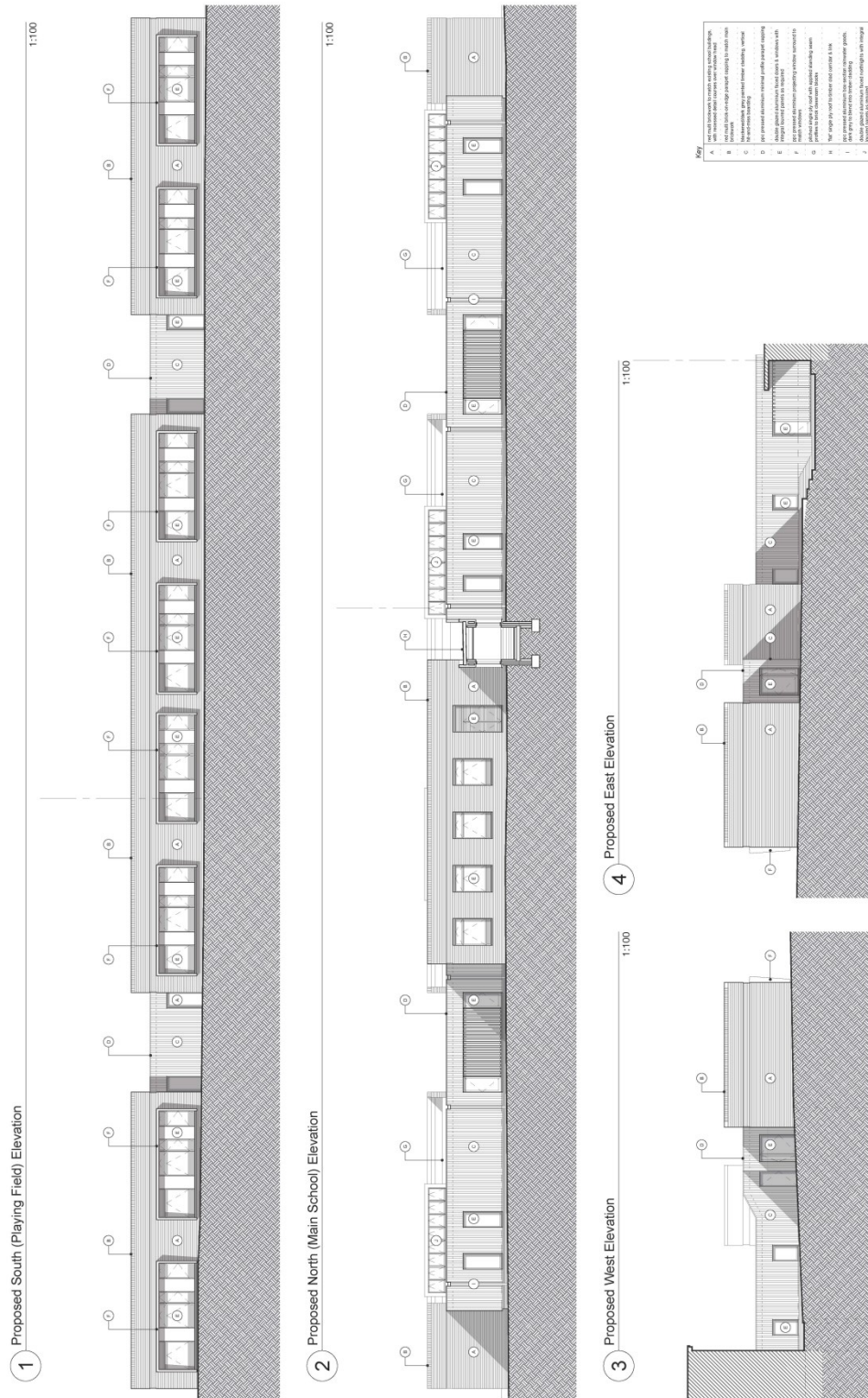
Proposed site plan



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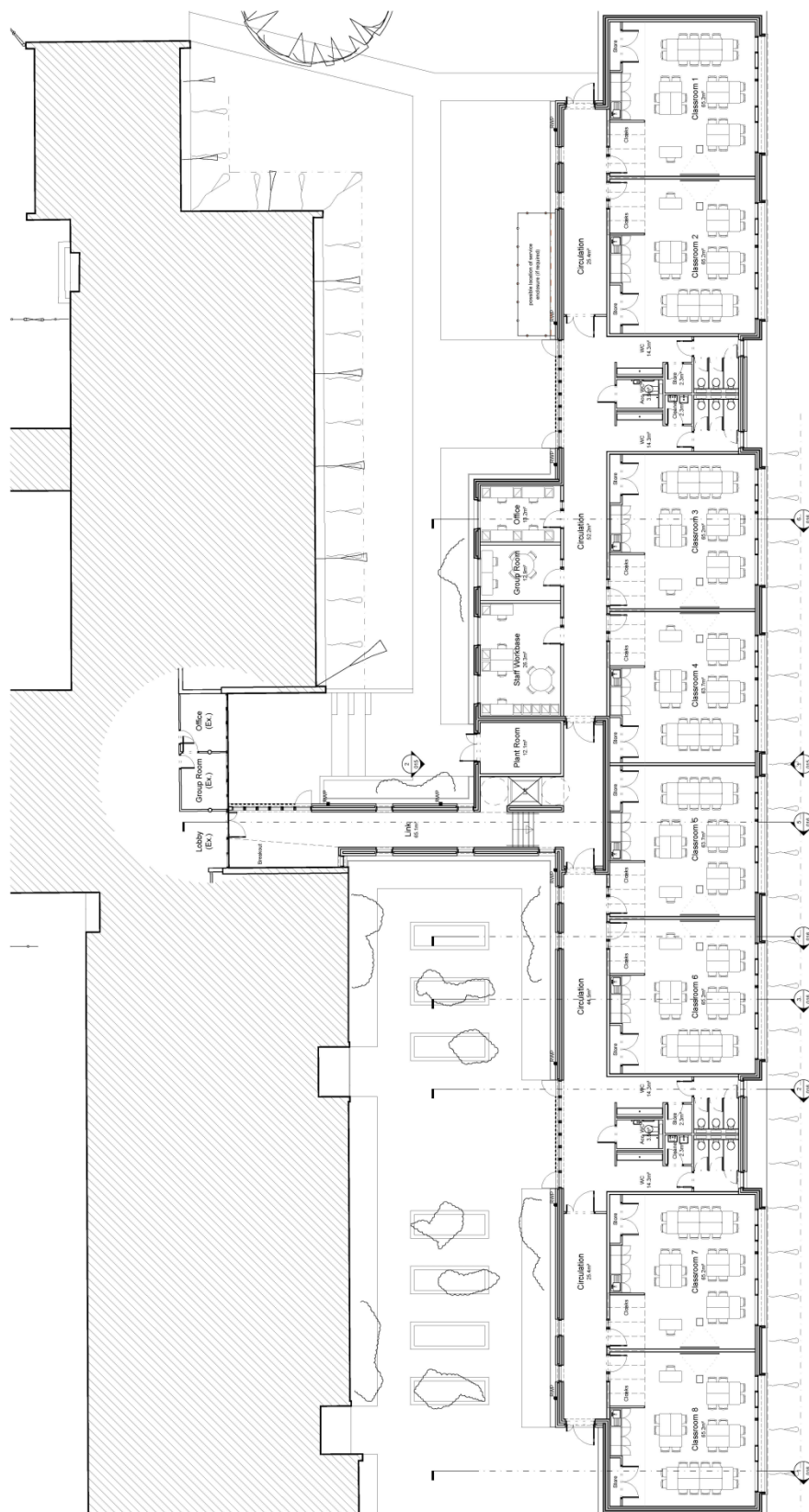
Proposed elevations



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Proposed Floor Plan



Single storey extension to accommodate 8 new classrooms and ancillary spaces at Temple Hill Primary School, St Edmund's Road, Dartford – DA/16/01732/CPO (KCC/DA/0222/2016)

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Proposed Sports Pitch Layout



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12. There is a former school garden to the west of the existing mobile classrooms which contains a disused bus. The area is currently not used, and students would require supervision if they did use the area. The proposal includes reinstating this area as part of the school playing field. Courtyard space would be created in the areas between the proposed classroom block and the existing school building to accommodate recreation and socialising. The proposal does not require the removal of any trees.

Planning Policy Context

13. The most relevant Government Guidance and Development Plan Policies summarised below are pertinent to the consideration of this application:

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

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

- (ii) **Policy Statement – Planning for Schools Development** (15 August 2011) sets out the Government's commitment to support the development of state-funded schools and their delivery through the planning system.
- (iii) Adopted **Dartford Borough Council Local Plan 1995** (Saved Policies):

Policy S6	Encouragement should be given for proposals to conserve and improve the existing built environment
Policy B1	Development management proposals should not have a detrimental effect on the amenity of the local area and should be of a high quality design. Materials, access arrangements, parking and infrastructure should all be taken into consideration.
Policy B11	Proposals which would have an adverse impact on important archaeological sites should not be permitted.
Policy H12	Proposals for non-residential development should not have an adverse impact on the amenity of existing housing areas.
Policy T19	Development management proposals should not be permitted where they are not appropriately related to the highway network, or produce volumes of traffic in excess of the capacity of the highway network.

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| Policy T23 | Development Proposals should include adequate off-street parking facilities and appropriate rear access arrangements to properties |
| Policy T27 | Proposals for development and for new highways will be required to make adequate provision for pedestrians |
| Policy RT15 | Development proposals involving the loss of private or educational open space will not normally be permitted where the open space is important to the environment and amenity of the area which it is situated, or where the use of the site meets an important local need. |
- (iv) **Dartford Borough Core Strategy 2011:**
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| Policy CS15 | Managing Transport Demand: Any development proposals which generate additional traffic should employ methods to encourage sustainable modes of transport. |
| Policy CS21 | Community Services: Ensure the effective provision of community services. |
| Policy CS22 | Sports, Recreation and Culture Facilities: Appropriate existing sport, recreational and cultural facilities will be protected, unless it can be demonstrated that the facility is no longer needed or an equivalent, replacement facility in terms of quality, quantity and accessibility is provided elsewhere. |
- (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 was held in October 2016. The plan is expected to be adopted by Dartford BC towards the end of 2016 or early 2017)
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| Policy DP1 | A positive approach will be taken to considering development proposals, with a presumption in favour of sustainable development. |
| Policy DP2 | 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, (b) ensuring heritage assets are retained, re-used and respected, (c) facilitating a sense of place through mix of uses and careful design, (d) providing clear pedestrian and cycle linkages and permeability, active frontages and a mix of buildings and spaces. Further advice is given on scale, massing, form, materials, Conservation Areas and areas of heritage sensitivity, inclusive, safe and accessible places, management of natural resources and food alleviation, and appropriate signage and advertisements. |
| Policy DP3 | Development will only be permitted where it is appropriately |

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located and makes suitable provision to minimise and manage arising transport impacts, development will not be permitted where the localised impacts from the development on its own, or in combination with other planned developments will result in severe impacts on road congestion, safety of pedestrians and other road users, or excessive pressure for on-street parking

- Policy DP4** Development should be of a design and layout to promote sustainable modes of transport through provision of attractive and safe routes which address the needs of users, otherwise it will not be permitted. Proposals should include appropriate vehicular access arrangements to the new development. 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** 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 DP12** Where a development proposal may affect a heritage asset the proposal must demonstrate that it will preserve and, where appropriate, enhance those aspects of the heritage asset and its setting that have been identified as being significant; otherwise permission will not be forthcoming.
- Policy DP24** Development on playing fields and sports pitches will not be permitted unless it is clearly shown that; the proposal does not lead to any significant loss or deterioration in quantity and level of open space/recreational provision; replacement provision is provided within accessible walking distance of the site, unless it is clearly demonstrated that the existing provision is surplus to requirements for sports and recreation in the locality.

Consultations

14. **Dartford Borough Council** raises no objection but have the following concerns:

“The proposal would result in the loss of playing field land which Sport England has objected to. Consequently, Kent County Council need to consider whether the loss of playing field land would be acceptable in this instance in order to facilitate the school expansion.

The proposal states that the scheme would result in an increase of 210 new students attending the school and the submitted travel plan highlights that there will also be an increase in staff numbers. Dartford Council's Parking Standards SPD requires 1 space for pupils/visitors/clients per 2 classes and 1 space for employees per 15 pupils. Consequently, this scheme would generate an additional demand for 18 car parking spaces within the site (14 for staff and 4 for pupils/visitors/clients). The proposed 8

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additional parking spaces are therefore not considered sufficient to facilitate the increase in classrooms and pupil numbers. Especially as 4 of the proposed new parking spaces would not be useable (No's 56, 59 and 60 would not realistically be long enough to park a car in, and No. 4 would be located too close to the playground boundary, which would make it awkward and unpractical to use). Therefore, the Council recommends that the parking provision needs to be revised in order to provide the additional required parking provision and if the scheme cannot be revised to meet Dartford Council's Parking Standards, the applicant should seek to reduce parking demand through the implementation of a school travel plan. The Council is concerned that the travel plan submitted with the application is not sufficient to reduce the parking demand. Failure to provide the required parking provision would likely lead to increased indiscriminate on street parking to the detriment of highway safety of the adjacent roads."

Environment Agency (Kent Area) raises no objection but request an informative which advises the applicant on matters of foul drainage, land contamination and waste

Sport England raises objection to the proposal:

"The proposed development would appear to be sited on an existing area of playing field. Locating this aspect of the proposed development on the existing playing field would prejudice the use of the playing field."

*In light of the above, Sport England **objects** to the application because it is not considered to accord with any of the exception to Sport England's Playing Field Policy or with Paragraph 74 of the NPPF."*

Following receipt of the objection, further information was forwarded to Sport England setting out a case as to why the proposed development was inaccordance with one of the exemptions to Sport England's policy. The following response was received:

"Further to Sport England's consultation response dated 3rd October 2016, unfortunately Sport England is of the view that no new information has been provided and that all relevant considerations set out in the email and attached document recently provided were taken into account within Sport England's formal consultation response dated 03rd October 2016. For clarity, although there are two temporary classrooms on the site of the proposed development, these developments are temporary and should be removed from the playing field at the end of the temporary period permitted."

Sport England therefore maintains its objection to this planning application."

Kent Highways and Transportation raise **no objection** however note that the local highways are under strain by the presence of two primary schools. Consider that given the School's intention to expand the school car park, and their commitment to developing the Travel Plan and encouraging more sustainable modes of transport, the development would not have a severe impact on the free flow of traffic or road safety in the area.

County Archaeological Officer raises no objection but given the sites' archaeological importance, request the imposition of a condition securing a schedule of archaeological works to be carried out.

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Sustainable Drainage raise no objection and considers the proposed surface water management is appropriate.

Local Member

15. The local County Council Member, Tom Maddison, was notified of the application on 23 August 2016.

Publicity

16. The application was publicised by the posting of two site notices on the school perimeter, an advertisement in a local newspaper, and the individual notification of 244 residential properties.

Representations

17. In response to the publicity, one letter of representation has been received from a neighbouring resident as well as one petition.
18. The neighbouring resident has objected to the application as they consider that the development would result in an unacceptable noise impact on the residents of Pilgrims Court. They state that the noise is currently an issue during class time, play time, and other school activities such as fireworks displays and fetes. Whilst they do not object to the principle of the expansion or the redevelopment of the Porta cabin area; they find the proximity of the proposed classroom block to their property to be unacceptable.
19. The petition, signed by 14 signatories reads:

"With reference to my recent email objecting to the planning proposal for Temple Hill School Dartford I now enclose a petition signed by the residents of Pilgrims Court Dartford.

Please note that we have three vacant properties at present in our small Court who may also wish to have a say once they have moved in."

Discussion

20. In considering this proposal regard must be had to the Development Plan Policies outlined in paragraph (13) above. Section 38(6) of the Planning and Compulsory Purchase Act (2004) states that applications must be determined in accordance with the Development Plan, unless material considerations indicate otherwise. Therefore the proposal needs to be considered in the context of the Development Plan Policies, Government Guidance and other material planning considerations arising from consultation and publicity. This application is being reported to the Planning Applications Committee following objections from local residents and Sport England. In my opinion, the key material planning considerations in this particular case can be summarised as need, highways and transportation, siting and design, amenity impacts, sustainability, the loss of the playing field and potential impact upon archaeology.

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Need

21. There is strong government policy support for the sufficient provision of school places. In the Government's Policy Statement- Planning for Schools Development, it is asserted that the development of state-funded schools is strongly in the national interest, and planning decision-makers should exercise all powers necessary to ensure that applications for expansion are permitted wherever possible. This stance is strengthened in paragraph 72 of the NPPF, through which planning authorities are expected to take a proactive and positive approach when dealing with the requirement for school places, and to give great importance to allowing schools to expand. Policy CS21 of the Dartford Core Strategy seeks to ensure that there is sufficient provision of community facilities.
22. It is recognised that primary schools within the Dartford Borough are at capacity and there is an urgent need for new primary school provision within the area. The expansion of the school from 3FE to 4FE is essential in helping ensure that sufficient primary school places are available in the area. There is a considerable amount of housebuilding currently taking place, including the Northern Gateway development just west of the site.
23. The principle of the school expansion therefore is supported by government policy, through both the NPPF and the Planning for Schools Development Policy Statement, and it is in line with Policy CS21 of the Dartford Core Strategy.

Siting and design

24. Policy B1 of the Dartford Borough Saved Policies 1995 requires proposals to be of a high quality design and Policy S6 encourages proposals to conserve and improve the existing built environment. The NPPF attaches great importance to the design of the built environment, and consider that good design is indivisible from good planning.
25. As outlined in paragraphs 7-13 of this report, this application proposes the demolition of the two existing mobile classrooms situated on the school playing field, and the construction of a classroom block containing 8 new classrooms linked to the existing school building. The proposal also seeks to reconfigure the school car park to increase the amount of car and cycle spaces.
26. The proposed classroom block would be situated on an area that is currently designated as school playing field, but is not used as such due to the presence of the mobile classrooms which were granted permission in 2001. Sport England has objected to the siting of the classroom block due to its encroachment onto the school playing field. Local residents have also objected to the siting of the classroom block due to its proximity to their property, which they fear would result in unacceptable noise levels. Both of these issues will be discussed in detail later on in this report.
27. The proposed siting also allows for enhancement opportunities. A small unmaintained school garden area which contains a disused bus to the west of the mobile classrooms is currently dangerous for students to use unsupervised. This proposal would reinstate some of this area as part of the school playing field. Courtyards would also be provided in the spaces between the new classroom block and the main school building, to offer an area for recreation and socialising. Careful consideration has been given to the location of the classroom block, and in my view, its proposed siting is the best possible option with added benefits to the school.

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28. The design of the new classroom block is sympathetic to the 1950's design elements of the existing school building. It would have a flat roof and proposes the use of red brick, similar to that of the existing school building, and timber cladding; the windows would be well-spaced to emphasise the classroom areas. No windows are proposed to face the closest group of residential properties in Pilgrims Close, which offers these properties appropriate privacy. The design also incorporates measures to promote sustainable development, which will be discussed in further detail below.
29. I consider that suitable steps have been taken to ensure that the design of the building would conserve and enhance the existing school setting, and therefore the proposal is compliant with the Dartford Saved Policies B1 and S6. However, due regard has been given to possible alternative locations. Given the size of the proposed classroom block, the options elsewhere on site are limited. Anywhere on the hardstanding to the north or west of the main school building would not easily accommodate the footprint, and would result in either the loss of hard playing surface, or a number of parking spaces. The proposed siting is on an area of the site which is currently underused. Whilst it may be possible to site the classroom block elsewhere on the playing field to alleviate concerns of local residents, this could result in a larger amount of encroachment onto the school playing field, and interference with the schools marked out playing pitches. It is also the case that the positioning of the classroom block elsewhere would not work so well with the existing layout and organisation of the school.

Sustainability

30. The NPPF is interwoven with a presumption to promote sustainable development. Whilst there are no specific energy reduction targets applicable to individual developments, the NPPF recognises that planning can play an active role in meeting climate change targets by shaping places to reduce greenhouse gas emissions.
31. This proposal has been prepared with sustainability principles in mind. It is in line with the "Be Lean, Be Clean, Be Green" Energy Hierarchy and exceeds the standards set out in Building Regulation Part L2 2013 - "Conservation of fuel and power in new buildings other than dwellings". All materials used would be reviewed against the Green Guide for Building Specification which helps ensure they are of a sustainable origin.
32. There are a number of design measures proposed which are intended to reduce energy consumption. The windows would be double glazed and the walls would be cavity masonry to improve thermal insulation. This, combined with natural ventilation to the teaching areas, is expected to result in relatively low heating requirements. All of the teaching spaces in the new classroom block are south facing to allow for good levels of daylight and reduce the need for artificial lighting. The classroom block has been carefully positioned so that it is far enough away from the existing school building as to not block out daylight; however it is close enough to reduce the issue of overheating currently experienced in the existing classrooms. Potential overheating in the new classrooms would be circumvented with the use of solar control glazing. The water use would be minimised also with the specification of efficient taps, dual flush toilets and low water use appliances. The scheme includes photovoltaic panels to be installed on the south facing roof.
33. The sustainability of this proposal has been carefully considered, and steps have been undertaken to minimise carbon emissions. The building, by way of its design, layout, materials and technologies, is sustainable in my opinion.

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Impact upon school playing field

34. Paragraph 74 of the NPPF states that any open space, sports and recreational buildings and land, including playing fields should not be built upon unless; it is shown that the land is surplus to requirements, the loss resulting from the development will be replaced by equivalent or better provision in terms of quality and quantity in a suitable location, or the development is for alternative sports and recreational provision and the needs for which clearly outweigh the loss. Sport England's Planning Policy Statement – A Sporting Future for England's playing field, echoes the view of the NPPF; any application for development on a sports playing field will be opposed, with only a few exemptions to this rule. Policy RT15 of the Dartford Local Plan states that development proposals involving the loss of private or educational space will not normally be permitted where the open space is important to the environment and amenity of the area and Policy CS22 protects sport and recreation facilities.
35. The proposed classroom block would take up some of the area that is designated as school playing field. The distance of the classroom block from the main school building has been carefully calculated and whilst a closer distance to the school building would reduce encroachment, this is not possible without limiting the amount of daylight enjoyed by the classrooms.
36. Due to the encroachment onto the school playing field, Sport England object to the application on the basis that the location of the proposed development would prejudice the use of the playing field and is therefore contrary to both paragraph 74 of the NPPF and their Planning Policy Statement.
37. Exemption 3 (E3) to Sport England's policy is applicable if the proposed development affects land which is incapable of forming, or forming part of, a playing pitch, and therefore does not result in the loss of inability to make use of a playing pitch. The applicant submitted a statement which argues that E3 should apply in this case, as the current siting of the mobile classrooms prevent that area of the sports playing field being used as such. Sport England considered this view, however concluded that given that the planning permission for the mobile classrooms is a temporary permission, the mobile classrooms should be removed at the end of the permission so that the land can be reinstated to its former use. Whilst the practicality of this argument has to be considered, given that the mobile classrooms accommodate a school roll which is not set to decrease in the near future, I accept Sport England's argument that the siting of the mobile classrooms is not sufficient to render the land permanently unusable as a sports playing field.
38. The proposed classroom block would encroach in part onto an area of informal soft play area as well as one of the marked out pitches. The informal soft play area which it affects is incapable of being marked out as a playing pitch as it slopes towards the main school building. Building Bulletin 103 Area guidelines for main stream schools (BB103), sets out the standards expected of soft outdoor play and PE areas. For a school of this size, taking into account the forecasted increase in pupil numbers, a minimum of 2280m² (24,541ft²) of soft play areas are recommended. Even with the encroachment of the classroom block, the remaining soft play areas would be well in excess of this number, at 12,046m² (129,662ft²).
39. There are currently three marked out playing pitches on the school playing field, these total 8,900m² (95,863ft²), this is under the guidelines set out in BB103 for outdoor PE

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areas for the current school roll (12,600m² or 135,625ft²). Given the encroachment onto one of the playing pitches the applicant has taken the opportunity to reconsider the current layout of the sports pitches, and is now proposing that they are reconfigured. This would lead to an increase in the total area of the marked pitches to 10,760m² (115,819ft²). Although this is still under the guidelines for the predicted increase in pupil roll (16,800m² or 180,833ft²), a large amount of the school playing field is incapable of being marked out as a playing pitch, regardless of whether the new classroom block is to be built or not, this includes the area where the new classroom block would be sited.

40. It is accepted that the proposed development would encroach on to the school playing field. However, I consider that sufficient measures have been taken by way of the siting and the design of the classroom block in order to minimise this encroachment. The proposal also seeks to enhance a small unusable area to the west of the mobile classrooms so it can be used as a part of the school field, to compensate for some of the loss. Whilst the loss of the playing field is arguably not fully compliant with the NPPF, in my view, with the reconfigured pitches there would be no overall loss of the playing field to sport and recreation use, and the school otherwise benefits from additional informal soft play areas in excess of the recommended guidance. Furthermore, in terms of Local Plan Policy RT15, I do not consider that the development would harm the wider contribution the open space makes in general to the environment and amenity of the locality. Whilst the impact on the playing field is an important consideration, its impact needs to be considered alongside the need for the development and other material considerations. The construction of the classroom block is necessary to enable the school to expand to meet the statutory educational need and thus provide much needed school places within the area, for which there is strong government policy support for. For the reasons summarised above, I do not consider that the encroachment onto the playing field represents sufficient grounds for refusal of the application.
41. However given that Sport England has objected to the application, if Members are minded to grant permission the application would have to be referred to the Secretary of State for Communities and Local Government via the National Planning Casework Unit.

Highways and Transportation

42. Paragraph 34 of the NPPF sets out an expectation that planning decisions should take account of whether the use of sustainable modes of transport have been maximised. Paragraph 36 requires a Travel Plan to be submitted in support of any application which will generate significant amount of movement, whilst paragraph 32 also requires a Transport Assessment or Transport Statement to be submitted. In addition, it states that an application should be refused on transport grounds if the cumulative impacts of the development are severe.
43. Policy B1 of the Dartford Borough Local Plan states that development proposals should not have a detrimental effect on the local area through traffic generation, and Policy T19 states that development proposals will not be permitted where they are not appropriately related to the highway network, or where they produce volumes of traffic in excess of the capacity of the highway network. Policy T23 states that development proposals should include adequate off-street parking facilities; the Borough Council has also produced a Parking Standards Supplementary Planning Document (SPD) which offers further guidance on the matter. Policy T27 requires there to be sufficient provision for pedestrians. Policy CS15 of the Dartford Borough Core Strategy stipulates that any

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development proposal which generates additional traffic must employ methods to encourage sustainable modes of transport.

44. It is accepted that there are difficulties with regard to traffic congestion and parking within the area due to the presence of two primary schools. This has resulted in concerns, in particular, over the safety of pupils arriving at and leaving the school. However, Personal Injury Accident (PIA) data has been analysed and no incidents have been recorded within the last 36 months. There are "School Keep Clear" marking outside of the school entrance on St Edmund's road, either side of the carriageway, and signs are placed daily on these markings to prevent cars from parking there and to remind drivers to park safely. The school is also committed to delivering regular road safety education and programmes to the pupils. In an effort to reduce the localised on-street parking, the school is intending to extend its "Walking Bus" service.
45. The school currently has a majority of its pupils travelling to school via sustainable modes of transport. Because of the residential density of the area, an estimated 55% of pupils regularly walk to school (February 2016). This is accommodated and encouraged by the 4 pedestrian access points within the school, wide foot-ways along St Edmund's Road and several local pedestrian improvements such as formal crossing points. This is in compliance with Policy T27 of the Dartford Local Plan, which requires effective provisions for pedestrians. Furthermore, due to the school's suburban location, it naturally benefits from good, sustainable transport links. A Travel Plan was submitted with the application setting out the targets for sustainable modes of transport over the next few years and the proposed methodology for achieving these targets; this includes initiatives such as the "Walking Bus".
46. The proposal aims to increase current total pupil numbers from 682 to 892, with an additional 14 members of staff to support this increase, resulting in a total of 106 staff. Whilst a formal pick-up and drop-off facility is not possible due to the locational restrictions of the site, the proposal is seeking to increase the size of the existing car park. Using the guidelines set out in the Parking Standards SPD, this would require the on-site staff car park to provide 60 spaces. Using the same guidelines; an additional 15 spaces would also be required to account for visitor parking, and a minimum of 3 spaces are required to be designated as disabled parking. The intention within the proposal is to increase the amount of parking spaces to 70, 3 of which would be designated for disabled parking. Dartford Borough Council has concerns that that the parking provisions are under the recommendations set out in their parking SPD, and consider that the measures set out in the submitted school Travel Plan are not sufficient to reduce the need for these extra parking spaces. KCC Highways and Transportation officers, however, are satisfied that the proposed number of parking spaces is acceptable. They also highlight that the school has in the past made a commitment to implement a walking bus from the nearby "Temple Hill Square car park" to encourage more parents to drop pupils off there, and this would alleviate some of the pressure from the school car park. The school has confirmed that they are still committed to implementing this, and it could be covered under a condition requiring the revision of the School Travel Plan. Dartford Borough Council also suggested that 4 of the proposed parking spaces would be unfit for use due to their size or location. 3 of these spaces are parallel parking spaces; the recommended length of such spaces is 6 metres. The proposed site plan does indeed indicate that they will be 6 metres in length; this has been confirmed by the applicant also. The other space, next to the school playground, has been shown to be slightly wider than the other spaces, this should allow for sufficient room to use it despite its proximity to the school playground. KCC Highways

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are of the opinion that these spaces would not necessarily be difficult to access, however in the interests of certainty, suggest a condition be attached which requires the submission of a drawing showing the exact dimensions of the proposed parking spaces along with vehicular tracking.

47. In terms of vehicular transport, the Transport Assessment states that the increase in pupil roll would result in an additional 40 trips in the morning and an additional 41 in the afternoon. Given the base number of trips is approximately 260 for both the morning and afternoon, the increase is not considered significant and therefore not expected to cause severe impacts on the highway network. However, there have been several solutions considered by the applicant in liaison with KCC Highways and Transportation in order to alleviate some of the congestion issues on St Edmund's Road. One suggestion was to impose one-way traffic restrictions in an effort to minimise conflict between passing vehicles. However, KCC Highways officers considered this to be inappropriate in a location such as this as it would most likely result in an increase in vehicle speeds which would threaten pupil safety. Various local parking restrictions have also been considered, however this was seen as impractical as it would result in the loss of on-street parking in a fairly dense residential area. Any such restrictions would have to be consulted on locally and would be likely to attract objections from residents.
48. Whilst KCC Highways and Transportation acknowledge that there are congestion issues surrounding the site, they conclude that given the school's commitment to expanding the car park and promotion of sustainable modes of transport through an up-to-date travel plan, the development would not cause severe impacts on highway grounds. The imposition of a condition which requires the school to maintain an up to date travel plan would ensure that sustainable modes of transport are continued to be encouraged, to keep future impacts on the highway network to a minimum. Given the above, I consider that the application is compliant with the relevant planning policies and that there is no basis on which to refuse the application on highway grounds.

Amenity – Noise

49. Paragraph 123 of the NPPF expects planning decisions to prevent noise from giving rise to significant and adverse impacts on health and quality of life, and impose conditions where necessary to mitigate negative amenity impacts arising from noise. It is however, recognised within the NPPF that development will create some noise, and development should not be unreasonably restricted due to changes in nearby land uses since they were established.
50. Policy B1 of the Dartford Local Plan states that proposals should not have a detrimental effect on the amenity of the local area; this can be taken to include noise impacts. Policy H12 stipulates that any proposals which are incompatible with existing housing areas or which adversely affect their amenity should not be permitted.
51. The representation from a neighbouring resident is focused on the noise impact that the proposals may have. The resident considers that the noise exhibited by the school is already having a significant and adverse impact on their quality of life, so if the school is to expand any closer to the perimeter of their property the impacts would only be worsened. There is 17.5m (54ft) distance between the proposed extension and the closest residential property; 18 Pilgrims Close.

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52. In response to the concerns of local residents, the applicant prepared a statement which addresses the possible noise impacts that may be generated as a result of the new classroom block. It is stated that the new classroom block would have much better sound insulation than the current mobile classrooms. There are no windows which would directly face Pilgrims Close to the east, and double glazed windows and cavity walls would be used to prevent any noise reaching the external environment. There would also be an enclosed link between the new classroom block and the main school building, to prevent the noise from pupils when in transit between the two buildings, this is not currently the case. The applicant also advises that no teaching activities which could generate significant amounts of noise, such as music or sport, would be carried out. Similarly, there are no amplified audio systems proposed inside or outside of the building, and no externally mounted call bells.
53. The land directly behind numbers 13-18 Pilgrims Close is currently marked out as playing field, which may generate noise for the residents during school playtimes. The proposal includes the relocation of the marked out sports pitches, which results in this closest pitch being moved further away. This should alleviate some of the noise currently experienced.
54. For the reasons stated above, I consider that the proposed development would be an improvement on the existing situation with regard to noise, and it would not result in significant adverse amenity impacts which would be contrary to policies B1 and H12.

Construction

55. Given that the proposal is in close proximity to a number of residential properties, and there are already concerns from residents about noise, I consider it appropriate to impose a condition restricting the hours of construction to between the hours of 0900 and 1800 Mondays to Fridays and 0900 to 1300 on Saturdays, with no works to take place on Sundays or public holidays.
56. Furthermore, if planning permission is granted, the applicant should be required to submit a Construction Management Plan detailing vehicle loading, unloading and turning facilities and provisions for wheel-cleaning, prior to commencement of any works on site. This should further protect the amenities of the locality.

Archaeological Environment

57. The NPPF recognises that heritage assets are an irreplaceable resource which should be conserved in a manner consistent with their significance, great weight should be given to an asset's conservation. In paragraph 128, the NPPF expects local authorities to require any applicant to explain the significance of any heritage asset which may be affected by the development. Where any development has an impact on sites of archaeological interest, appropriate desk-based assessments are required and, where necessary, a field evaluation. Policy B11 of the Dartford Local Plan states that proposals which will adversely affect nationally important archaeological sites will not normally be permitted.
58. The application site lies within an area of high archaeological potential, especially for prehistoric and Romano-British/Iron-Age remains. The site is also known to contain Boyn Hill Gravels which have the potential to contain Palaeolithic stone artefacts and

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palaeoenvironmental remains. In accordance with the NPPF requirement, the applicant submitted a desk-based assessment to accompany the proposal.

59. The assessment recognises that whilst there isn't a known presence of archaeological features, the site does have a high archaeological and geo-archaeological potential. The assessment concludes that through the implementation of mitigation measures, the development is unlikely to have a significant impact on any heritage assets.
60. The County Council's Archaeological Officer supports the approach set out in the desk-based assessment. It is recommended that, in view of the archaeological potential, a condition is attached to any planning consent requiring the submission and approval of a schedule detailing archaeological field evaluation works prior to commencement of any development. Subject to the imposition of such a condition, I do not consider that the proposed development would have a detrimental effect on any archaeological remains, or the historic environment.

Conclusion

61. This application has been considered and assessed against the NPPF, the National Planning Practice Guidance, the Planning for Schools Development Policy Statement, and the local development plan for the area. It is my view that the application is in a suitable location and of good quality and sustainable design, would not result in any significant, adverse impacts on the highway network or the amenity of the area, and does not unacceptably prejudice the use of the school playing field. There is also strong policy support for the principle of this school expansion. With the imposition of conditions, I consider that the development would not result in any material harm. However, given the objection from Sport England, I recommend that the application be referred to the Secretary of State for Communities and Local Government and subject to his decision, planning permission be granted subject to conditions.

Recommendation

62. I RECOMMEND that the application BE REFERRED to the Secretary of State for Communities and Local Government and subject to his decision, PERMISSION BE SUBJECT TO the imposition of conditions covering (amongst other matters) the following:
- The standard time limit;
 - The development to be carried out in accordance with the permitted details;
 - The submission of details of all materials to be used externally;
 - Hours of working during construction to be restricted between the hours of 0800 and 1800 Monday to Friday and between the hours of 0900 and 1300 on Saturdays, with no operations on Sundays or Bank Holidays;
 - The submission of a Construction Management Plan, providing details of construction vehicle loading/unloading and turning facilities, and measures to be taken to prevent mud and debris being deposited on the public highway;
 - A revised School Travel Plan, to include the commitment to operating the "Walking Bus" from the nearby Temple Hill Square car park;
 - The implementation of the revised School Travel Plan and its future review and revision where necessary;

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- The submission and written approval of a specification for a programme of archaeological works; and
- A detailed drawing showing the layout of the car park, and specifically the dimensions of all parking spaces, prior to construction; and
- Submission and approval of details of photovoltaic panels.

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

- The registering with Kent County Council of the School Travel Plan through the “Jambusters” website following the link <http://www.jambusterstpms.co.uk>; and
- The applicant follows the Environment Agency’s advice with regard to foul drainage, land contamination and waste.

Case Officer: Mrs Alice Short	Tel. no: 03000 413328
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Background Documents: see section heading
