

SECTION D
DEVELOPMENT TO BE CARRIED OUT BY THE COUNTY COUNCIL

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

Item D1

Retention of temporary classrooms for a further 3 year period at Seal C of E Primary School, Zambra Way, Seal, Sevenoaks - SE/17/2395 (KCC/SE/0210/2017)

A report by Head of Planning Applications Group to Planning Applications Committee on 11 October 2017.

Application by Kent County Council Property & Infrastructure Support for the retention of two temporary double classroom modular buildings, permitted under consent references SE/11/980 and SE/15/2465, for a further 3 year period at Seal C of E Primary School, Zambra Way, Seal, Sevenoaks, TN15 0DJ - SE/16/01043/KCCREG3 (KCC/SE/0055/2016)

Recommendation: The application be referred to the Secretary of State for Communities and Local Government in respect of the objection from Sport England, and subject to his decision, that planning permission be granted, subject to conditions.

Local Member: Mr Roger Gough

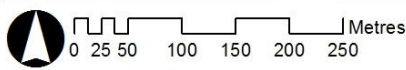
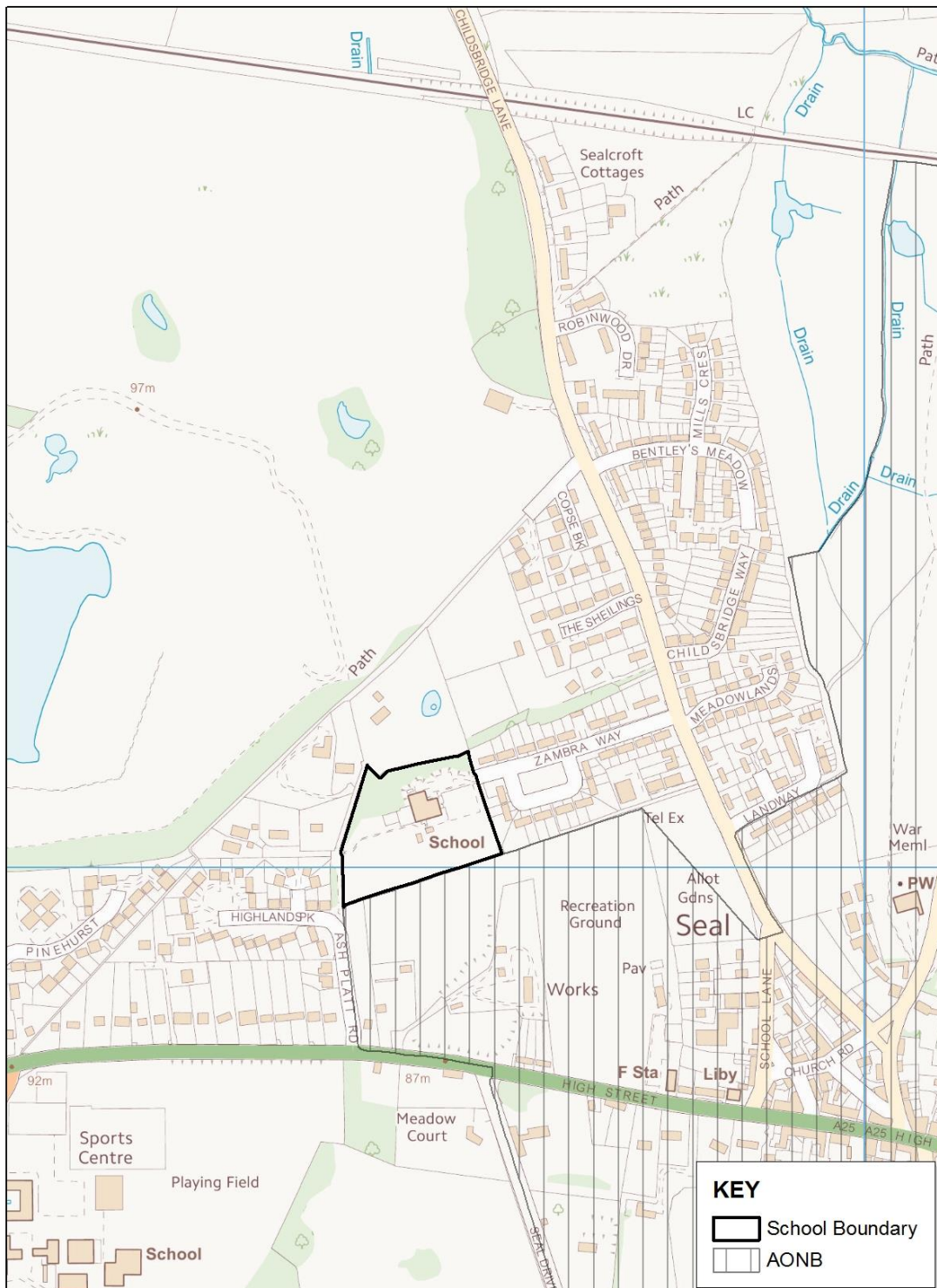
Classification: Unrestricted

Site

1. Seal Primary School is housed in a single storey building which is located at the end of a cul-de-sac in the village of Seal. The existing building is constructed with brickwork and rendered blue panels under a flat roof, with white fascias, windows and doors. The school is located in a central position within the school site, behind the hard surfaced playground. The playing fields lie to the south of the school and the site is well screened along the boundaries, including a wooded area to the north. Four temporary mobile classrooms are located on site, to the west, south and east of the main building, one of which is occupied by a private nursery. An area of staff parking (28 spaces) is located to the north of the school, accessed from a single vehicular entrance off Zambra Way. The access is gated and there are zig-zag keep clear markings outside the school gates. Zambra Way is a residential cul-de-sac, with semi-detached two storey properties located in a regular pattern around a small green. A secondary pedestrian only access to the school is provided from Ash Platt Road to the west, after its junction with Highlands Park, where it becomes a single width unmade road. Ash Platt Road is accessed from the A25 and serves a number of detached properties, but also provides access to Highlands Park which is a residential cul-de-sac of 26 properties.
2. The school lies outside of the settlement boundary of Seal, within the Metropolitan Green Belt and adjacent to the Kent Downs Area of Outstanding Natural Beauty (AONB), which meets the school's southern boundary. On a wider scale the village's recreation ground and community centre lie to the south-east of the school, accessed from the A25 Seal Road. The community centre has a car park and a pedestrian footpath which runs between this and Zambra Way. This recreation ground falls within the Seal Conservation Area which extends further to the south-east.

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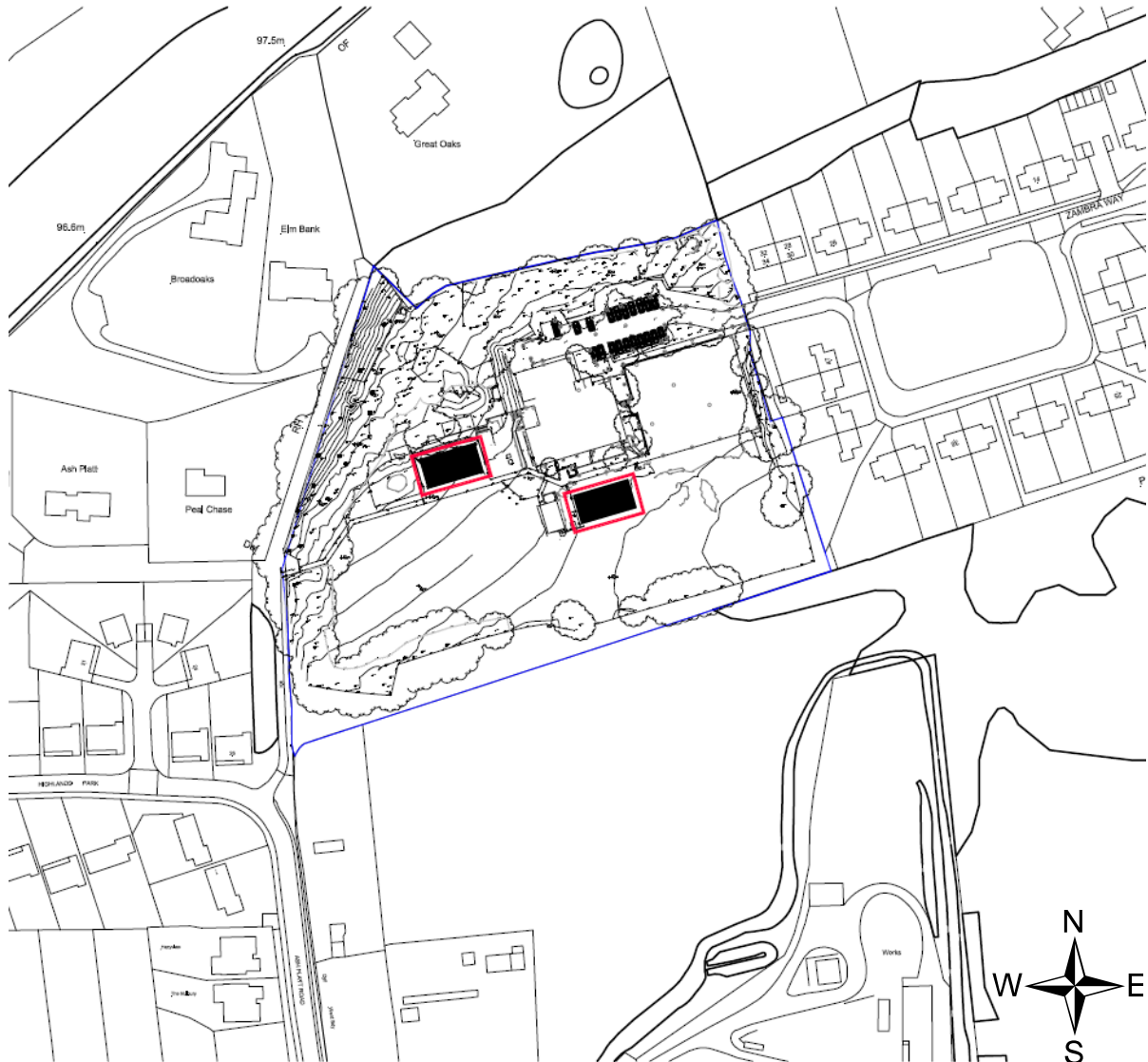
General Location Plan



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Ordnance Survey 100019238

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Site Layout Plan



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Background/Relevant Planning History

3. Seal Primary School has recently been expanded from 1 form of entry to 2 form of entry (FE). However, the School does not currently have the building capacity to accommodate the number of pupils it is allocated. Application reference SE/16/1043 (KCC/SE/0055/2016), which proposed to provide the required accommodation for the pupil allocation by undertaking internal alterations and refurbishments in addition to a single storey extension, was originally on the Agenda of the Planning Applications Committee meeting on the 13 July 2016. However, at the request of the Applicant, the application was deferred from that meeting to allow the applicant additional time to give further consideration to the highway and access concerns raised by the local community and to explore the possibility of further mitigation, over and above that that was already proposed.
4. Following additional consideration by the applicant of the concerns raised, which included a meeting with Seal Parish Council to consider possible alternative sites for additional parent parking, the application was considered at the 7 December 2016 Planning Applications Committee Meeting. My recommendation was to refer the application to the Secretary of State (in relation to a Sport England objection) and that, subject to his decision, permission be granted subject to conditions. However, after the debate, Members resolved to refuse permission on the following grounds:
 1. *The proposal would represent inappropriate development in the Metropolitan Green Belt by reason of the scale and size of the extension and the increase in built form on the site, which would be harmful to and would not maintain the open character of the Green Belt, contrary to Policy GB8 of the Sevenoaks District Council Allocation and Development Management Plan, Policy L08 of the Core Strategy and paragraph 89 of the National Planning Policy Framework.*
 2. *The proposed expansion of the school would result in an increase in school related traffic on surrounding roads without provision in place of adequate mitigation measures to offset the expected adverse travel impacts, contrary to Policy T1 of the Sevenoaks District Council Allocation and Development Management Plan.*
5. The applicant is currently in the process of preparing a revised application for the provision of the additional permanent accommodation required for a 2FE Primary School which also seeks to address the above grounds of refusal. That application is due to be submitted in the near future.
6. In the interim, the applicant has provided a temporary classroom building of 129m² on the school site to accommodate the September 2017 pupil intake. That building was provided under permitted development pursuant to Class M of Part 7 to Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). Therefore, a planning application was not required.
7. In addition to the above, the planning history for the school includes a number of applications over the past 9 years for various temporary mobile classrooms, and their subsequent retention. This includes an application granted permission in October 2015 for the demolition of 4 prefabricated units and their replacement with a double mobile classroom unit for a period of 18 months. That application, SE/15/2465, granted

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temporary permission for the modular building which expired on the 31 March 2017. The School has use of one further modular building on the site, which was granted temporary permission under consent reference SE/11/980. That permission expired at the end of June 2016. Apart from a modular building used by a private nursery, all other temporary classroom buildings have been removed from the site.

Proposal

8. This application has been submitted by Kent County Council Property & Infrastructure Support and proposes the retention of the two double mobile classroom units on the site for a further three year period. As detailed in paragraph 7 above, the two double mobile classroom units were permitted under consent references SE/11/980 and SE/15/2465, and both previous temporary consents have now expired.
9. The first of the two modular buildings, permitted under consent reference SE/11/980, is located to the west of the main school building, on an area which was previously home to an outdoor swimming pool. The second of the two buildings, permitted under consent reference SE/15/2465, is located to the south of the main school building on the edge of the school playing field. However, as outlined in paragraph 7 above, the modular building replaced 4 smaller prefabricated units which were spread over a wider area.
10. Both modular buildings are single storey with a flat roof, and are used for general teaching accommodation. The modular building to the west of the school is finished in a pale blue, to match the colour finish of the main school building. The other modular building is finished in dark green. The retention of these two buildings per se would not result in an increase in staff or pupil numbers so no additional parking/access improvements are proposed at this time.

Planning Policy

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

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

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

- achieving the requirement for high quality design and a good standard of amenity for all existing and future occupants of land and buildings;

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

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

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

(ii) Development Plan Policies**Sevenoaks District Core Strategy: Adopted February 2011:**

- Policy L08** **The Countryside and Rural Economy:** Seeks to maintain the extent of Green Belt, and conserve and enhance the countryside, including the distinctive features that contribute to the special character of its landscape and its biodiversity. The distinctive character of the Kent Downs Area of Outstanding Natural Beauty and its setting, will be conserved and enhanced.
- Policy SP1** Requires all new development to be designed to a high standard, reflect the distinctive local character of an area, create safe, inclusive and attractive environments, incorporate sustainable development principles and maintain biodiversity. Account should be taken of guidance adopted by the District Council in the form of Conservation Area Appraisals and Parish Plans, amongst other matters. The District's heritage assets and their settings, including listed buildings, conservation areas, historic buildings, archaeological remains, landscapes and outstanding views will be protected and enhanced.
- Policy SP2** Sets standards for sustainable design and construction. Institutional development will be required to achieve a BREEAM rating of at least 'very good'.
- Policy SP11** Seeks to conserve biodiversity, to ensure no net loss through development and to promote opportunities to enhance biodiversity.

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Sevenoaks Allocations and Development Management Plan (February 2015)

- Policy EN1** **Design Principles:** sets out the need for high quality design and for proposals to meet criteria including: responding to scale, height and materials; respecting the topography and character of the site and any sensitive features; not result in the loss of buildings or open space that would affect the character of an area, provided satisfactory means of access and parking provision; include opportunities for increasing biodiversity potential, including sustainable drainage and to avoid harm to existing biodiversity; create a permeable layout; safe and easy access for those with disabilities; creation of a safe and secure environment to deter crime and fear of crime; include modern communication technology and infrastructure; and make efficient use of land.
- Policy EN2** **Amenity Protection:** Proposals should provide adequate residential amenities for existing and future occupiers of development, and safeguard amenities of existing and future occupiers of nearby properties by ensuring development does not result in excessive noise, vibration, odour, activity, vehicle movements, overlooking or visual intrusion and where it would not result in a loss of privacy or light.
- Policy EN5** **Landscape:** Sets out that the Kent Downs and High Weald Areas of Outstanding Natural Beauty and their settings will be given the highest status of protection. Proposals that affect landscape throughout the District will need to conserve the character of the landscape including areas of tranquillity.
- Policy GB8** **Limited Extensions to Non Residential Buildings in the Green Belt:** Proposals to extend an existing non-residential building within the Green Belt which would meet the following criteria would be permitted – (a) the existing building is lawful and permanent in nature and (b) the design and volume of the proposed extension, taking into consideration the cumulative impact of any previous extensions, would be proportional and subservient to the original building and would not materially harm the openness of the Green Belt through excessive scale, bulk or visual intrusion.
- Policy T1** **Mitigating Travel Impact:** Sets out the need to mitigate against adverse travel impacts including their impact on congestion and safety, environmental impact such as noise, pollution and impact on amenity and health.
- Policy T2** **Vehicle Parking:** Sets out that vehicle parking provision, including cycle parking, for non-residential developments should be in accordance with the advice of Kent County Council as Local Highway Authority.

Consultations

12. **Sevenoaks District Council** raise no objection to the application.

Seal Parish Council raise no objection to the application.

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Kent County Council Highways and Transportation Officer raises no objection to the application, and comments as follows:

“It is assumed that since this is an application for the renewal of an existing temporary consent for temporary classrooms that they will be no increase in pupil numbers or staff numbers as a result of purely this application.

Whilst it is appreciated that there is a certain amount of congestion and parking caused at school start and finish times which affect local residents, these are of short duration and only occur during school term times. The impact of this application should not make the current situation any worse and create a highway safety issue - this was the recommendation to you by Highways in October 2015 when the previous application for temporary classrooms was applied for renewal.

Therefore no objection is raised to this application on highway grounds but it is recommended that a condition be applied to require a revised School Travel Plan to be submitted and registered on KCC's "Jambusters" web site within 3 months of the start of the term when these temporary buildings are utilised. This will hopefully encourage a greater number of pupils and staff to travel to and from the school by sustainable means and reduce the highway impact of the pupil / staff numbers already attending the school.”

The County Councils School Travel Plan Advisor confirms that Seal Primary School has an up-to-date and approved School Travel Plan that meets the County Councils criteria.

Sport England raise objection to the application as comment as follows:

“The existing modular building to the west of the school would appear to be separated from the rest of the playing field land by a pathway, making this land less usable as playing field.

However there are concerns regarding the building to the south of the school. This is sited on what is considered to be usable playing field and makes the land less usable for pitches, interrupting what would be a rectangular section of playing field and making the space far less flexible for sport. It is considered that the land it is on is capable of forming part of a playing pitch and no evidence has been provided to the contrary to support the applicant's claim that the area is unsuitable for playing field. The proximity of school buildings, as claimed by the applicant, does not preclude this area being used as a playing pitch providing the necessary run-off distances are maintained. Therefore this application cannot be considered under Exception 3¹. Nor is the proposal considered to meet Exception 4² as claimed by the applicant, as no replacement playing field is proposed by this application as demanded by this exception.

It is noted that Sport England does not appear to have been consulted when these modular buildings were originally put in place.

¹ *Exception E3: The development is on land that is incapable of informing, or forming part of a playing pitch.*

² *Exception E4: The playing field to be lost would be replaced by a playing field of equivalent or better quality in a suitable location.*

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

Local Member

13. The local County Member, Mr Roger Gough was notified of the application on 26 July 2017.

Publicity

14. The application was publicised by the posting of two site notices (one at each entrance to the school), an advertisement in a local newspaper, and the individual notification of 17 residential properties.

Representations

15. In response to the publicity, 1 letter of representation has been received. The key points raised can be summarised as follows:
- Objection is raised if this application in anyway facilitates a further expansion of the school;
 - Even with the current pupil numbers, it is considered that the use of the rear pedestrian access poses a serious health and safety issue to pupils and parents, as well as being a major inconvenience to local residents;
 - It is considered that the existing rear access to the school is not fit for purpose, and that a new entrance should be created which would avoid parents and pupils using the narrow road leading up from Ash Platt Road to the rear school gate;
 - Parents should be prevented from parking in Ash Platt Road and Highlands Park, and made to park in Seal Recreation Grounds car park and walk with their children from there.

Discussion

16. In considering this proposal regard must be had to the Development Plan Policies outlined in paragraph 11 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.
17. This application is being reported for determination by the Planning Applications Committee due to an objection raised by Sport England, and the single neighbour representation received concerning the safety of an existing access and general highway matters. In my opinion, the key material planning considerations in this particular case are the principle of the retention of the modular buildings in this location in relation to the Green Belt and adjacent AONB, a continued loss of part of the potential playing field, and highway and traffic implications. Amenity impacts for neighbouring residents also needs to be considered.

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Green Belt and Wider Landscape Considerations

18. Sevenoaks District Core Strategy Policy L08 seeks to resist inappropriate development within the Green Belt, unless justified by very special circumstances and this aim is reflected in Policy GB8 of the Sevenoaks Allocations and Development Management Plan Document – the details of these policies are set out above in paragraph 11. 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.

19. 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 which affects the openness of it would be contrary to planning policy.

20. By virtue of the criteria in the NPPF, and various Local Plan policies, the development is inappropriate in Green Belt terms. Although paragraph 89 of the NPPF lists examples of development that could be considered appropriate within the Green Belt, in my view the proposals would not meet these exceptions and 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 special circumstances that would warrant setting aside the general presumption against inappropriate development.

21. A Design and Access was submitted in support of this application, which includes a Green Belt Statement setting out why the applicant considers it is justified to set aside the general presumption against what would be inappropriate development in the Green Belt in this case. First, it is important to note that the two temporary double classrooms units are already on site, and have previously been subject to separate planning approvals. The Green Belt case for the siting of each of the buildings has therefore previously been accepted by the County Planning Authority. Furthermore the secluded nature of the site, which is well screened by existing mature tree and hedge planting, combined with the siting of the buildings adjacent to the main school building, and the massing of the single storey buildings, in my view means that the development as proposed would not unduly impact upon the functioning of the Green Belt (as set out in paragraph 18). I am also satisfied that the development as proposed would not have an impact on the character and appearance of the adjacent Area of Outstanding Natural Beauty (AONB) due to the degree of separation between the boundary of the AONB and the modular buildings, in addition to the mature tree screening along the southern

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boundary of the school site which acts as a physical barrier between the AONB and the school.

22. Further, as detailed in paragraphs 3 to 5 of this report, a permanent accommodation solution is being sought by the applicant. The existing permanent accommodation on site is not of sufficient size and suitability to accommodate the allocated pupil numbers following an expansion from 1 to 2 Forms of Entry. Although this application is not proposing accommodation for an additional intake of pupils at the Primary School, a refusal of the application would result in a loss of accommodation, resulting in a loss of school spaces. As outlined in paragraph 11 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 to existing and new communities.
23. The NPPF states that Planning Authorities should take a proactive, positive and collaborative approach to meeting this requirement. 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) further sets out the Government’s commitment to support the development of state funded schools and their delivery through the planning system. In addition, Sevenoaks District Core Strategy contains planning objectives that seek to protect existing school sites and support the improvement of facilities where necessary. The loss of existing school places would therefore be contrary to Development Plan Policy, and would not be justified in this instance.
24. Although the continued retention of temporary accommodation is not an ideal planning solution, it is a temporary interim measure which would enable the County Council to fulfil its statutory obligations to provide sufficient school places in the area whilst an acceptable permanent solution is developed. It will also be noted that the District Council have not raised an objection to this application in this instance.
25. 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, guidance and the NPPF. The development is, by definition, inappropriate development for the purposes of Green Belt considerations and is, therefore, 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 temporary buildings helps to mitigate and minimise the impact of the development on the functioning and openness of the Green Belt. The site layout represents the option which strikes the best balance between minimising physical intrusion into the Green Belt and providing sufficient accommodation and facilities to enable the School to deliver its educational requirements. Accordingly, I do not consider that an objection on Green Belt grounds would be warranted in this particular case. In addition, I also do not consider that the development as proposed would adversely affect the character and appearance of the adjacent AONB due to the contained nature of the development and the significant existing tree screening which separates the school site from the AONB.
26. The Town and County Planning (Consultation) (England) Direction 2009 states that inappropriate developments within the Green Belt should be referred to the Secretary of State for determination if the floor space to be created is 1000 square metres or more,

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or if the development, by reason of its scale or nature or location, would have a significant impact on the openness of the Green Belt. In considering this application, and taking into account the matters discussed and addressed above, I do not consider that the scale, nature or location of this development would have a significant impact on the openness of the Green Belt. In addition, the development is under the 1000 square metre threshold. For these reasons, I do not consider that this application needs to be referred to the Secretary of State for determination on Green Belt grounds.

Impact on Playing Field Provision

27. As outlined in paragraph 9 of this report, the first of the two modular buildings, permitted under consent reference SE/11/980, is located to the west of the main school building, on an area which was previously home to an outdoor swimming pool. As set out in paragraph 7, Sport England do not have concerns over the siting of that modular building as it is separated from the rest of the playing field by an established pathway, making the land upon which it is sited less usable as playing field.
28. However, the second of the two buildings is located to the south of the main school building, on the edge of the school playing field. Sport England object to the retention of that building as they consider that it would not accord with any of the exceptions to Sport England's Playing Field Policy. Although that modular building replaced 4 smaller prefabricated units which were spread over a wider area, Sport England advise that had they commented on the original application, an objection would have been raised.
29. As outlined above, and supported by aerial photographs, the area of the site where the second of the modular classrooms is located has accommodated various modular buildings for in excess of 10 years. The area has not therefore been usable playing field for that period of time. The requirement to consult Sport England is set out in The Town and Country Planning (Development Management Procedure) (England) Order 2015, and specifically refers to consulting them on developments on land which has been used as playing field within the last 5 years. Although arguably the modular building is on playing field land, it has not been used as such in the last 5 years and I am satisfied that the temporary retention of the modular building would not in any way affect the usable playing field that has been available for at least 10 years.
30. Furthermore, the applicant advises that the temporary buildings to be retained do not affect the schools main playing field area as they are adjacent to the main school building and/or a further modular building (which is used by a private nursery and under the planning control of the District Council). The two modular buildings to which this application relates do not, in my view, affect the schools main playing field area which is located to the south west of the site. Further, the school has a considerable amount of open amenity space which again would not be affected by the temporary retention of the modular buildings.
31. It is also important to note that the retention of the modular buildings is only required as an interim temporary measure whilst a permanent accommodation solution is sought. The applicant is seeking a further three year temporary approval for both of the modular buildings, and I do not consider that time frame to be unreasonable in considering the work the applicant is undertaking in seeking to provide permanent accommodation at the site subject to planning permission being granted. However, should permission be granted, I consider it appropriate to require the removal of the temporary modular buildings, and reinstatement of the land, at the expiration of a further 3 year period.

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Subject to that condition, I do not consider that the retention of the modular buildings would have an adverse effect on playing field provision at the site.

32. Should Members be minded to agree with the recommendation of this report and grant planning permission subject to conditions, then in accordance with The Town and Country Planning (Consultation) (England) Direction 2009, and the DCLG letter of 10 March 2011, the application should be referred to the Secretary of State for Communities and Local Government for his consideration

Amenity Considerations

33. Having accepted the suitability of a temporary retention of the modular buildings on Green Belt (and wider landscape) and Sport England grounds, it is important to assess amenity implications. No objections have been received regarding the buildings themselves, only potential highway and access implications which will be discussed below. It is important to note that the modular buildings are already on site and located well within the site boundaries, screened from local properties by existing school buildings and/or mature and substantial boundary planting and trees. The temporary retention of the modular buildings, in my view, would not impact upon the amenity of local residents. Although temporary accommodation should be just that, a planning application is due to be submitted in the near future which would, subject to planning approval, provide permanent accommodation for a full 2 Form of Entry. I therefore consider that a further temporary permission would be appropriate in this instance, subject to the consideration of highway matters.

Access, parking and highway issues

34. As outlined in paragraph 10 of this report, this application is seeking a temporary retention of two modular buildings that are already on site. Should permission be granted, the modular classrooms would continue to provide teaching space for existing pupils and would not directly result in an increase in staff or pupils numbers. The representation received from a local resident objects to the proposal should it facilitate a further school expansion. As stated above, that is not the case.
35. However, the representation also states that the use of the existing pedestrian rear access point poses a health and safety risk to pupils and parents, as well as being an inconvenience to local residents. The resident considers that that access should be shut and a new access created, with parents prevented from parking in Ash Platt Road and Highlands Park and made to use Seal Recreation Grounds car park instead.
36. As outlined throughout this report, this application is proposed as an interim temporary measure whilst a permanent solution is sought and seeks a continuation of existing arrangements. Should a temporary retention of the modular buildings be granted permission, the existing highway and access arrangements would remain unchanged. Given that staff and pupil numbers would not be affected by such a temporary retention, I do not consider it justified to require any changes to the existing access arrangements in this instance.
37. Kent County Council Highways and Transportation raise no objection to this application and confirm that the retention of the modular buildings would not 'make the current situation any worse and would not create a highway safety issue'. However, even though the School have an up-to-date and approved School Travel Plan, it is considered

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by Highways and Transportation that a further updated version should be submitted within 3 months to further encourage the use of sustainable transport and reduce the reliance on car use. Therefore, subject to the imposition of a condition requiring the submission of a revised School Travel Plan within 3 months of the date of the decision (should permission be granted), I see no reason to refuse this application on highway grounds. However, that conclusion is also based on the temporary nature of the accommodation, and subject to the two modular buildings being removed from site at the expiration of 3 years from the date of the decision.

Conclusion

38. This proposal seeks the retention of two existing modular classroom buildings for a further 3 year period to meet educational needs in the locality. In my view, the development would not give rise to any significant material harm and is in accordance with the general aims and objectives of the relevant Development Plan Policies. I do not consider that the temporary retention of the two modular buildings would affect the principle aim of protecting the Green Belt, or have an undue impact on playing field provision. The development is in accordance with the principles of the National Planning Policy Framework and the Planning Policy Statement for Schools (2011). Subject to the imposition of the conditions outlined throughout this report, I consider that the proposed development would not have a detrimental impact on the functioning or openness of the Green Belt and/or the character and appearance of the local landscape, particularly the adjacent Area of Outstanding Natural Beauty, the local highway network or the amenity of local residents. I therefore conclude that the development is sustainable and recommend that the application be referred to the Secretary of State for Communities and Local Government for his consideration in respect of the Sport England objection and, subject to his decision, that permission be granted subject to conditions.

Recommendation

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

- the development to be carried out in accordance with the permitted details;
- the two modular buildings to be removed from site at the expiration of 3 years from the date of the decision, and the land reinstated; and
- submission of an updated School Travel Plan within 3 months of the date of the decision.

Case Officer - Mary Green

03000 413379

Background documents - see section heading
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