

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**

**Proposed 2FE Primary School with associated access and infrastructure on land at St George's CofE School, Gravesend – GR/17/674 (KCC/GR/0165/2017)**

A report by Head of Planning Applications Group to Planning Applications Committee on 8 November 2017.

Application by Kent County Council Property & Infrastructure Support for a 2 storey 420 place Primary School with car park, playground, floodlit artificial pitch, and associated landscaping with a new access road, footpaths, highway improvements (including the widening of Westcott Avenue and the provision of a footpath link to Lanes Avenue) and service connections at Land at St George's Church of England School, Meadow Road, Gravesend, DA11 7LS – GR/17/674 (KCC/GR/0165/2017).

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 Dhesi and Dr Sullivan

**Classification:** Unrestricted

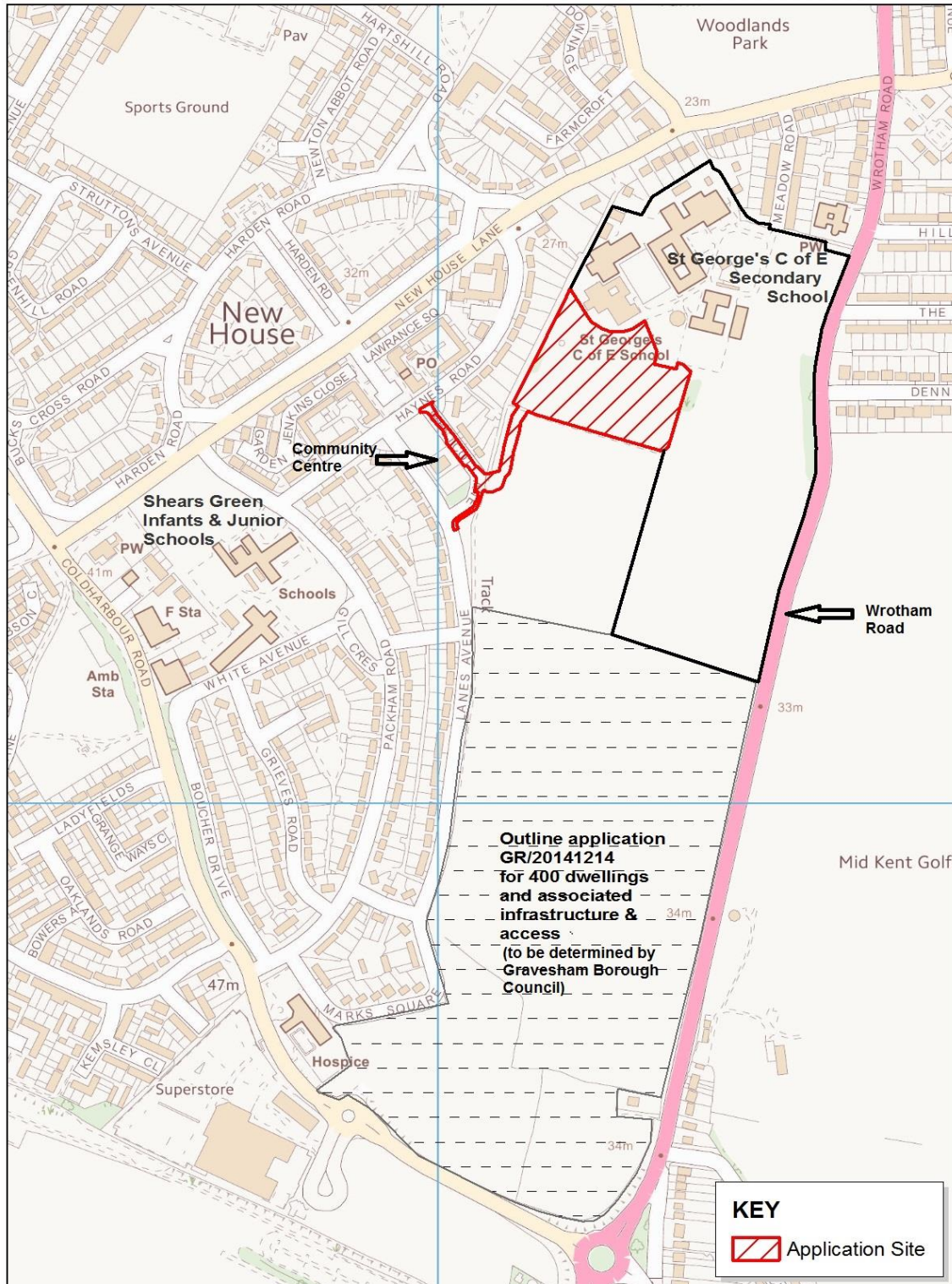
**Site and Background**

1. The new 2 Form Entry (2FE) Primary School is proposed to be provided within the grounds of St Georges Church of England Secondary School, located approximately 1.2 miles to the south of Gravesend Town Centre. The Secondary School is accessed via Meadow Road, a residential street off New House Lane, which provides through access to the school site only. Wrotham Road, a main route into Gravesend Town Centre from the Tollgate A2 junction to the south, runs along the eastern boundary of the Secondary School site.
2. The Primary School application site comprises an area of land approximately 2.07 hectares (5.11 acres) in size, and lies to the south of the main Secondary School buildings to the western side of the site. The site is currently used by the Secondary School as informal amenity grassland, and has a gradient of between 1:25 – 1:34, falling approximately 7 metres from east to west. To the east of the application site the land falls steeply away, with a grass bank separating the application site from the secondary schools formal playing fields/sports pitches. A line of mature trees runs along the top of the embankment, forming a natural site boundary. A secure fence line and mature trees and thick scrub form the southern site boundary, beyond which lies an open agricultural field which is owned by the County Council. The north western corner of that field is also included within the planning application site boundary to facilitate access to the primary school from Westcott Avenue to the south west (see paragraphs 13-16).

# Item D1

## Proposed 2FE Primary School with associated access and infrastructure on land at St George's CofE School, Gravesend – GR/17/674 (KCC/GR/0165/2017)

### Site Location Plan

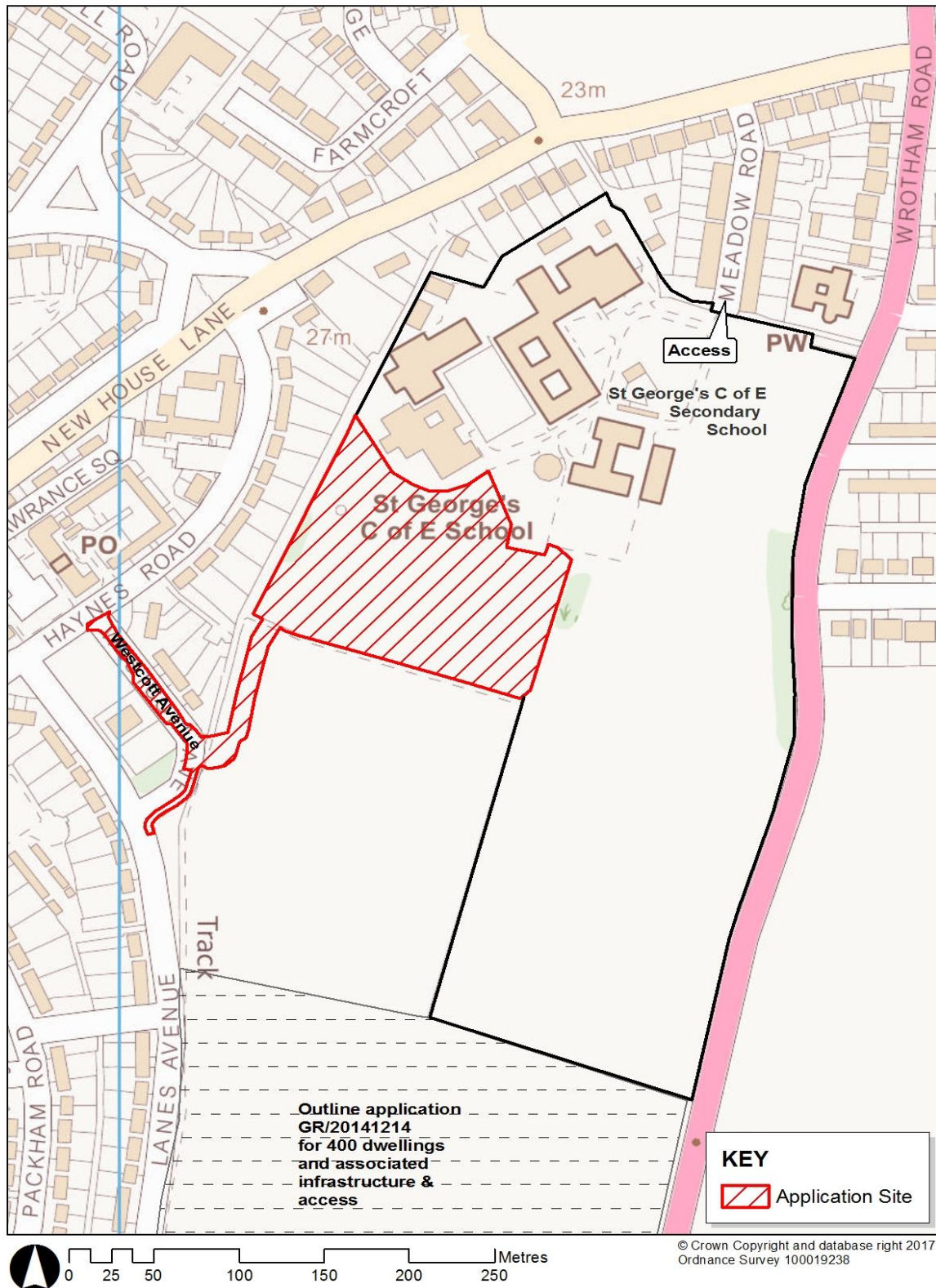


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# Item D1

## Proposed 2FE Primary School with associated access and infrastructure on land at St George's CofE School, Gravesend – GR/17/674 (KCC/GR/0165/2017)

### Existing Site Plan





**Proposed 2FE Primary School with associated access and infrastructure on land at St George's CofE School, Gravesend – GR/17/674 (KCC/GR/0165/2017)**

**Proposed Site Plan – Phase 2**

**Notes**

1. This drawing is a site plan for the proposed 2FE Primary School with associated access and infrastructure on land at St George's CofE School, Gravesend. It is intended to be used in conjunction with the accompanying planning application and other relevant documents.

2. The site plan shows the proposed layout of the school building, access roads, parking areas, and other infrastructure. It is intended to provide a clear and detailed view of the proposed development.

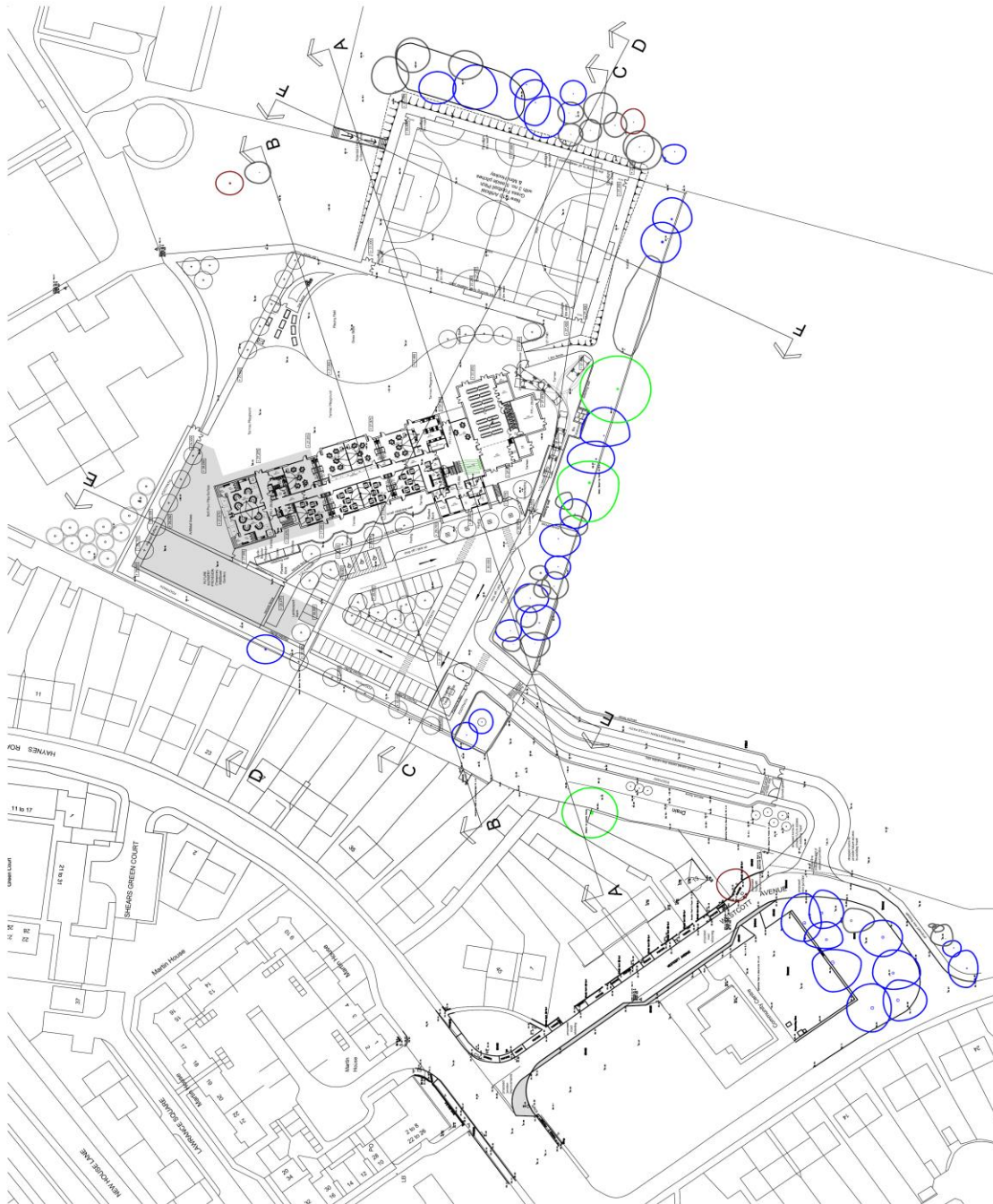
3. The site plan is based on the information provided in the accompanying planning application and other relevant documents. It is intended to provide a clear and detailed view of the proposed development.

4. The site plan is intended to provide a clear and detailed view of the proposed development. It is intended to provide a clear and detailed view of the proposed development.

5. The site plan is intended to provide a clear and detailed view of the proposed development. It is intended to provide a clear and detailed view of the proposed development.



1:500 scale for Planning Application



Project No: GR/17/674 (KCC/GR/0165/2017)  
 Date: 17.03.2017  
 Scale: 1:500  
 Drawing No: PH2  
 Drawing Title: Proposed Site Plan  
 Phase: PHASE 2

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Kent County Council

Project:  
 St George's CofE Primary School  
 Construction and Property Consultants  
 Proposed 2FE Primary School  
 Drawing No:  
 Proposed Site Plan  
 PHASE 2

Revision No.	Rev. Description	Date
01	Issue for Planning	17.03.2017
02	Issue for Planning	17.03.2017
03	Issue for Planning	17.03.2017
04	Issue for Planning	17.03.2017
05	Issue for Planning	17.03.2017
06	Issue for Planning	17.03.2017
07	Issue for Planning	17.03.2017
08	Issue for Planning	17.03.2017
09	Issue for Planning	17.03.2017
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50	Issue for Planning	17.03.2017

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**Proposed Site Plan – Phase 2**



**Notes**

This drawing is copyright and remains the property of Bailey Partnership and is for use on this project and on any other associated construction contracts.

DO NOT SCALE this drawing (printed or electronic version). Contractors must check all dimensions on site.

All other design team members, where indicated, have been copied from the contractor's issued and approved drawings to include the technical specification, dimensions and/or annotations which may be necessary for construction purposes.

Discrepancies and/or ambiguities apply to the drawings, and information plan dimension and/or annotations, where necessary, shall be resolved by the contractor.

All works shall be carried out in accordance with the Local Planning Officers and Council of Planning Officers (LPO) decision reference to the site plan.

Responsibility for the interpretation of any drawings is given to the contractor, and it is the contractor's responsibility to ensure that the drawings are interpreted correctly. The contractor shall be responsible for ensuring that the drawings are interpreted correctly. The contractor shall be responsible for ensuring that the drawings are interpreted correctly.

This drawing is issued for the purpose of information and is not to be used for construction purposes. It is the contractor's responsibility to ensure that the drawings are interpreted correctly. The contractor shall be responsible for ensuring that the drawings are interpreted correctly.

It is assumed that all works on this drawing will be carried out by a competent contractor, unless otherwise specified in a separate contract document.

FOR CONTINUATION REFER TO BAILEY PARTNERSHIP DRAWING SGG-BP-XX-XX-DR-A-900002

FOR CONTINUATION REFER TO BAILEY PARTNERSHIP DRAWING SGG-BP-XX-XX-DR-A-900004

Received - 2 June 2017  
Planning Applications Group

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Client: Kent County Council

Project: St. George's CofE Primary School  
Gravesend, Kent  
Proposed 2FE Primary School

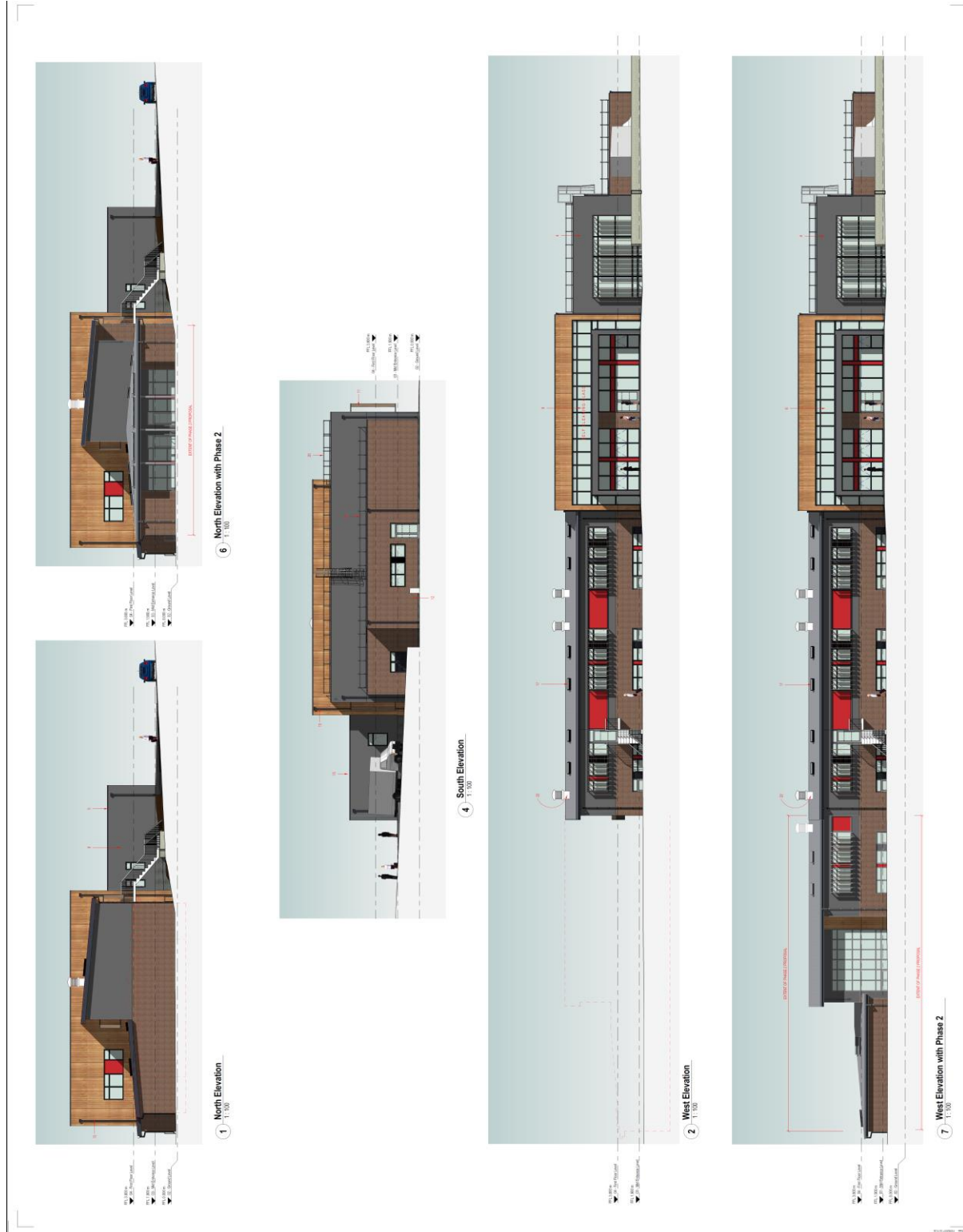
Drawing: Proposed Site Plan  
Sheet 2 of 3

Purpose of Issue		Status
PLANNING		P1
Project No:	Scale: G1	Date:
280113	1:200	17.03.2017
Revision:	Drawn	Checked
-	SD	DV
All Drawing Details:		
Drawn:	SD	Checked:
Scale:	1:200	Approved:
Project:	SGG	Number:
Client:	BP	000003

# Item D1

## Proposed 2FE Primary School with associated access and infrastructure on land at St George's CofE School, Gravesend – GR/17/674 (KCC/GR/0165/2017)

### Proposed north, south and west elevations – Phase 1 & Phase 2



**Proposed 2FE Primary School with associated access and infrastructure on land at St George's CofE School, Gravesend – GR/17/674 (KCC/GR/0165/2017)**

**Proposed east and sectional west elevations – Phase 1 & Phase 2**





### **Proposed 2FE Primary School with associated access and infrastructure on land at St George's CofE School, Gravesend – GR/17/674 (KCC/GR/0165/2017)**

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3. The western boundary of the application site is demarcated with the existing Secondary School's secure fence line, some individual trees and areas of scrub. Beyond the fence line lies an overgrown and, in places impassable, private access to the rear of properties in Haynes Road, which back onto the application site. Properties in Westcott Avenue back onto the gardens of properties in Haynes Road, with the eastern most property being located adjacent to the proposed access into the site. A single storey community centre and associated car park is located on an area of grassland to the front of properties in Westcott Avenue, with Lanes Avenue beyond. Haynes Road continues for approximately 200 metres beyond the Westcott Avenue junction, at which point it meets Packham Road which provides access to Shears Green Infant School, which shares a site with Shears Green Junior School.
4. To the south of the Secondary School site, beyond the agricultural field owned by the County Council, outline planning permission is pending for the development of a 17.46ha site to provide 400 dwellings and associated infrastructure and access. The planning application, reference GR/20141214 was submitted in December 2014, and considered at the Borough Councils Regulatory Board on the 3 June 2015 where Members resolved to grant outline planning permission. At the time of writing this report I understand that the Section 106 Agreement is being finalised and that following that, the outline planning permission will be issued. It should be noted that under Policy CS21 of the Gravesham Borough Council Core Strategy, the agricultural field owned by the County Council is also included within the Coldharbour Road key site designation (for the mixed use development), in addition to the area of land covered by that planning application.
5. There are no significant trees within the site, no ecological or landscape designations, and the site is not within a Conservation Area, nor within the setting of any Listed Buildings.

*A site location plan is attached.*

#### **Need**

6. The Applicant advises that there is a large predicted demand for school places within Kent, and that general overall expansion is required to meet that need. Being a popular local choice for education, St Georges Church of England Secondary School was identified by the Education Authority as a strong candidate for providing primary school places. As a faith school, I am advised that the secondary school has been a strong driver in wanting to deliver 'through school' opportunities on a shared site. The proposed school would not only meet the identified demand for additional local primary school places, but also meet the need for Church school places across the Gravesham area. The provision of a new primary school would also allow for greater parental choice and would ensure that there is local provision for places to meet future needs, particularly in considering future local housing developments.

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#### **Proposal**

##### Accommodation

7. This application proposes the erection of new two storey 2 Form Entry (2FE) Primary School with car park, playground, floodlit artificial pitch, and associated landscaping with a new access road, footpaths, highway improvements (including the widening of Westcott Avenue and the provision of a footpath link to Lanes Avenue) and service connections. The school building has been designed to be delivered in two phases in order to accommodate the anticipated pupil demand and intake, with Phase 1 accommodating 210 pupils (1FE) and phase 2 taking the school up to the 420 pupil (2FE) capacity.
8. The phase one works would include the construction of two thirds of the school building, with only the north western third of the building being left until phase two, and practically all of the external development including the vehicular and pedestrian access routes, car parking, playground, floodlit artificial pitch, and external teaching spaces. Phase two of the development would provide six further classrooms, a stairway and office space and an extended playground area. It is anticipated that the school would take up to twelve years to reach its operational capacity (420 pupils, 2FE) but that phase one of the development would be completed by September 2018. The school would have an initial intake of 60-90 pupils and thereafter an intake of 30 per year until a total of 210 pupils (1FE) is reached. Following that, it is anticipated that the intake would be increased to 60 pupils per year. The applicant advises that when at full capacity the school would employ 38 members of staff.
9. It is noted that an area at the north western end of the site has been identified on the application drawings as a possible site for a future nursery which, should it be required, would be the subject of a separate planning application. As part of this application, that area is of the application site is proposed to be used as wildflower garden.

##### Design and Appearance

10. The applicant advises that the site topography has informed the layout and design of both the building and external spaces. Public space to the front of the school has been designed to accommodate activities at peak school times, and also general day to day activities with footpath connections and landscaping separating the built development on site and adjacent residential development. Beyond the secure building line behind the car parking and circulation space, the two storey building is 'dug' into the natural slope of the site, giving the building the appearance of being almost single storey when viewed from the front. To the rear of the school building, amenity space and a floodlit all weather pitch are proposed. The all weather pitch would also be used by the secondary school and be available for community use out of school hours, accessed via the secondary school site.
11. The proposed rectangular shaped school building would sit diagonally across the site, running in a linear form from the north west to the south east, being approximately 91 metres in length and 18 metres in width for the most part. The applicant advises that the building has been designed around a central core, containing the schools 'heart space'

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and key administration functions. Flanked either side of that central area are the classroom wing to the north west, and the main hall and kitchen space to the south east. The main access to the building is level with the car parking area to the front of the site, and is at mid level between the ground floor and first floors. The main building then sits behind the projecting main entrance, with the ground floor set below ground level at the front of the building, but with level access at the rear. Most of the building is two storey, although the kitchen, servery and stores to the south eastern end of the building, and two classrooms to the north west and four classrooms to the rear are all single storey.

12. The applicant advises that it was decided at an early stage to develop a palette of materials that would give the primary school a separate identity to that of the adjacent secondary school. The predominant external materials proposed are a red/brown brick to the ground floor and single storey elements, with a charcoal grey render to the first floor and entrance. The central 'heart space' of the building would be clad in wood effect cladding, which is also used as a detail to break up the long lengths of brickwork on the ground floor. A red coloured cladding panel is also proposed within the glazing sections of the building to punctuate the overall darker tones of the building, whilst also introducing the St Georges identity, reflecting the red within the St George's shield. Vertical trespa Brise Solieil, supported on aluminium brackets, not only provide a rhythm to the external façade, but serve a purpose in preventing the building from overheating. A standing seam aluminium roofing system is proposed, to be powder coated in RAL 7012 – dark grey. An array of solar photovoltaic panels are proposed to be installed on the hall roof.

#### Access/Parking

13. Vehicular and pedestrian access to the site is proposed via a new access point to the south west corner of the application site. The access road would extend from the southern end of Westcott Avenue across the north west corner of the County Council owned agricultural field to the south of the main application site. The access road is designed to be two way, with short term parking bays to both sides to provide areas for parents to drop off and/or collect pupils. A raised cobbled strip down the centre of the access road would deter vehicles from turning in the road, encouraging them to enter the school site and follow the one way loop system back out to the exit.
14. Vehicles entering the school car park would proceed in a clockwise loop in a 'procession' at peak school times, with further spaces available within the car park for pupil drop off and pick up, in addition to two dedicated short stay drop off zones. The car park would provide 27 staff car parking spaces, 19 visitor/parent spaces and 3 accessible spaces (a total of 49 parking spaces). The applicant further advises that the two drop off/pick up zones within the car park, along with the two zones either side of the access road, would provide 31 additional parking opportunities on the site. In addition, the applicant is proposing to provide a minimum of 10 cycle parking spaces and secure scooter parking.
15. Pedestrian routes into the site are proposed to be provided to each side of the access road to support the drop off/pick up zones, the eastern of which is proposed at 3 metres in width to create a shared cycle/footpath. Crossing points are proposed within the site to enable pedestrians to safely cross the access road/car park where necessary. The

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main pedestrian route to the west of the access road would provide access to the main playground of the Primary School, and also link to the Secondary School beyond, improving pedestrian access to that school. It is envisaged that the majority of parents would drop off and collect younger pupils from the main playground at the start and end of the school day.

16. Externally, it is proposed to extend the existing footway along Westcott Avenue to link with the footway network in Lanes Avenue to the south, providing safe footways to both sides of the school access road. In addition, the applicant is proposing further off-site highway improvements which would be implemented prior to the school roll exceeding 210 (1FE). Those works include the widening of Westcott Avenue to the north of the school access to 6 metres to better accommodate two way traffic, and subsequent realignment of the parking and kerb-line to the west of Westcott Avenue and kerb-line improvements at the junction with Hayes Road.

#### Landscaping/External Areas

17. To the rear of the school building grass amenity space, a hard surfaced playground and a floodlit all weather pitch (AWP) are proposed. The AWP would be surfaced with artificial grass and would be located adjacent to the eastern site boundary. The 63metre by 42.6m pitch could accommodate either an under 10s football pitch, three five-a-side football pitches or a mini hockey pitch. The AWP would have floodlights (see paragraph 20 below) and is proposed to be made available for community use outside of school hours. The out of hours access would be via the secondary school.
18. Apart from a small section of boundary planting that would need to be removed to accommodate the new access road into the site, the applicant advises that all other boundary trees and planting is to be retained. A total of 11 trees are proposed to be removed to facilitate the development, in addition to three trees which are to be removed due to poor health. The landscape proposals identify the location for the planting of over 80 replacement/additional trees, a minimum of 65% of which would be native species. Hedge planting and wildflower planting is also proposed, including the provision of an enclosed wildlife garden.
19. The southern and western boundaries of the proposed primary school would be demarcated and secured by the existing fencing which currently marks the boundary of the secondary school site. The northern and eastern boundaries would be secured with black 1.8m high vertical bar fencing, with tree planting and hedging proposed to the boundaries to soften the appearance of the fencing. The AWP is proposed to be enclosed with 4m high green weld mesh fencing.

#### Lighting

20. The applicant advises that all external lighting would be in accordance with Chartered Institute of British Service Engineers guidance notes, and that the lighting design has had due regard to the amenity of local residents. Six metre high lighting columns are proposed along the access road and within the car park, with one metre high bollard lighting proposed along the internal footways. Soffit lighting would highlight the front entrance of the school, and bulkhead light fittings 2m above ground level would provide

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general perimeter lighting and security lighting to the school building. External lighting would be controlled by a combination of photocell sensors and time clocks, and all lighting would be LED.

21. The AWP is proposed to be floodlit by 8 luminaires, mounted on six 8m high floodlight columns, with an average illuminance across the pitch of 382 lux. Hours of use are proposed to be 0800 to 2200 hours Mondays to Fridays inclusive, and 0900 to 1900 hours on Saturdays, Sundays and Bank or Public Holidays.

*The application is accompanied by a Design & Access Statement, Planning Statement, Sport England Statement, Transport Statement, Travel Plan, Road Safety Audit, Desk Based Archaeological Assessment, Ecological Impact Assessment, Precautionary Mitigation Strategy, Drainage Details, Flood Risk Assessment, Phase 1 Ground Contamination Desktop Report, Landscape Statement, Tree Survey, External Lighting details & Unexploded Ordnance Risk Assessment.*

#### **Planning Policy**

22. The following Guidance/Statements and Development Plan Policies summarised below are relevant to the consideration of the application:

- (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;
- consideration of whether the opportunities for sustainable transport have been taken up and safe and suitable access to the site can be achieved for all people;

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Paragraph 74 of the NPPF states that: *Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements, or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location, or the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.*

In addition, Paragraph 72 states that: *The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local Planning Authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should give great weight to the need to create, expand or alter schools, and work 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****Gravesham Local Plan Core Strategy (2014)**

**Policy CS01 Sustainable Development** - States that a positive approach will be taken which reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework and in the Core Strategy.

**Policy CS10 Physical and Social Infrastructure** – States that support will be given to proposals that protect, retain or enhance existing physical and social infrastructure, including schools.

**Policy CS11 Transport** – States that new development should mitigate their impact on the highway and public transport networks as required. As appropriate, transport assessments and travel plans should be provided and implemented to ensure the delivery of travel choice and sustainable opportunities for travel.

**Policy CS12 Green Infrastructure** – Amongst other things seeks to protect, conserve and enhance landscape character, biodiversity, habitats and species.

**Policy CS13 Green Space, Sport and Recreation** – States that new development should seek to make adequate provision for and to protect and enhance the quantity, quality and accessibility of green space, playing pitches and other sports facilities.

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**Policy CS18 Climate Change** – Sets out criteria for new developments with regard to flood risk, water quality, sustainable drainage and surface water runoff, water demand management and carbon reduction.

**Policy CS19 Development and Design Principles** – Sets out criteria for new development, that includes (amongst other things) the need to avoid causing harm to the amenity of neighbouring occupants, including loss of privacy, daylight and sunlight, and avoid adverse environmental impacts in terms of noise, air, light and groundwater pollution and land contamination. New development should be visually attractive and locally distinctive, and must conserve and enhance the character of the local built, historic and natural environment.

**Policy CS21 Development of the land at the Coldharbour Road Key Site** will provide a mixed use development of around 500 dwellings with significant open space and biodiversity improvements and the provision of community facilities, potentially including a new primary school on-site.

The adopted **Gravesham Borough Local Plan First Review 1994** (relevant saved policies).

**Policy T1** - The Local Planning Authority will consider the impact on the transport system and on the environment of traffic generated by new development and would wish to ensure that all proposed developments are adequately served by the highway network.

**Policy P3** - The Borough Council will expect development to make provision for vehicle parking, in accordance with Kent County Council Vehicle Parking Standards.

**Consultations**

23. **Gravesham Borough Council** initially considered this application at their Planning Regulatory Board meeting on the 19 July 2017 and, whilst not opposed to the principle of the school, expressed a number of concerns relating to primarily access and highway matters. The applicant subsequently submitted additional information in support of the proposal, amplifying the original application documents and commenting on the Borough Councils points of concern. The Borough Council subsequently reported back to their Planning Regulatory Board on the 4 October, the Officer report to which concluded as follows:

“The rebuttal statement provides some useful clarification and additional information in relation to the proposed development. However the Borough Council (GBC) remains concerned about a number of aspects of the proposal. Principally these concerns relate to the access arrangement, the accuracy and extent of the transport assessment, the relationship between the proposal and

**Proposed 2FE Primary School with associated access and infrastructure on land at St George's CofE School, Gravesend – GR/17/674 (KCC/GR/0165/2017)**

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the adjacent Coldharbour Road housing site [see paragraph 4 of this report] and the sports provision impacts of the proposal.

GBC continues to query the accuracy and extent of the transport assessment and considers that it is likely to under-estimate the true highways impacts of the proposal. The document should be updated to reflect a larger parking bay size and wider pedestrian/cycleways. It should acknowledge the existing parking congestion at school peak times in Westcott Avenue, Haynes Road, Lanes Avenue and Lawrence Square and consider the potential for an alternative access via Coldharbour Road (via the adjacent housing site). It should consider the impacts of the increased catchment area of a faith school, the impacts of the proposed out of hours use of the sports facilities and the impacts on the roads surrounding the secondary school access resulting from displaced parent drop-off/pick-up to the new access.

GBC remains concerned about the lack of information regarding the relationship between the proposed school and the adjacent Coldharbour Road housing site. This should include the consideration of the potential for an alternative access to the school, ensuring that the school provision is timed to support the increased numbers of houses and a consideration of the impact of the proposed access on the overall amount of residential development.

GBC shares Sport England's concerns regarding the impact of the proposed development on existing sports facilities. In the absence of a clarification of the current/historic use of the land and a justification for the loss of any pitches, the Borough Council is unable to fully assess the impact of the proposal on sports provision."

I have been advised that the formal resolution of the Board was as follows:

1. That the Borough Council, whilst supporting the principle of the new primary school, still has significant concerns particularly relating to the parking and access arrangements at the school and the effect on resident parking and traffic congestion. If Kent County Council is nevertheless minded to grant planning permission it is requested that the Borough Council's suggested planning conditions should be imposed (*see below*).
2. That Kent County Council be advised that it be formally recorded that Gravesham Borough Council does not consider that Kent County Council has addressed the highway and parking impacts of the development on the surrounding community, the effect of which has been significantly underestimated.

The Borough Council suggest that, should permission be granted, the following matters should be covered by relevant conditions:

- Phasing for construction (in relation to the wider Coldharbour Road housing site);
- Phasing for construction (in relation to the timing of phase two);
- Details of the community use of the MUGA including opening hours and delivery;
- Remediation works for land contamination;



### **Proposed 2FE Primary School with associated access and infrastructure on land at St George's CofE School, Gravesend – GR/17/674 (KCC/GR/0165/2017)**

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- Proposed lights are switched off before the agreed curfew time;
- Opening hours for the school;
- Provision and retention of the access and parking areas;
- Control of conflicting traffic flows within the car park (cars versus delivery, refuse vehicles etc);
- Details of proposed works to the public highway (including timing);
- Details of visibility splays and sightlines for the access and the Haynes Road/Westcott Avenue junction improvement works;
- Details/samples of external facing materials;
- Details of the proposed landscaping works;
- Details of security measures for site and cycle/scooter storage;
- Details of boundary treatments;
- Details of plant/equipment on roof and in the service yard;
- Details of tree protection measures;
- Ecological mitigation and the timing of vegetation removal;
- Details of a Code of Construction Practice for both phases and management of construction impacts on the existing schools during phase two; and
- Provision of Travel Plan.

GBC further advise that there were two additional responses that were reported verbally to the Board meeting:

- GBC Property Services are concerned about the position of the school gate at the entrance and the potential for unauthorised access on to GBC land and concern at fly tipping
- Kent Police Crime Prevention Design Advisor - requests an informative that the applicants discuss Crime Prevention through Environmental Design (CPTED), Secured By Design (Schools) and BREEAM requirements with Kent Police”

Following the receipt of the Borough Council’s formal comments on this application, a further document was submitted by the Borough Council’s Highways Development Management Officer. A copy of that document is attached to this report as Appendix 1.

**Kent County Council Highways and Transportation** raise no objection to the proposal, subject to the imposition of conditions regarding the following:

- Submission and approval of full details of the off-site highway works (which would need to be agreed under a Section 278/Section 38 Agreement with KCC Highways) prior to commencement of the development;
- Completion of the approved off-site highway works prior to expansion in school roll to over 210 pupils (over 1FE);
- All parking, access and drop off area to be provided prior to occupation of the development (Phase 1) and thereafter annual monitoring of the onsite arrangement to allow the balance of staff parking and dropping off spaces to be adjusted if necessary;
- Submission and approval of details of secure and weatherproof cycle and scooter parking, and subsequent provision prior to occupation;
- Submission and approval of a full school Travel Plan prior to first occupation of the development, and thereafter ongoing annual monitoring and review;

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- Submission and approval of a Construction Management Plan for Phase 1 and Phase 2 of the development, approved prior to works on each phase commencing.

Highways and Transportation further advise that the application is accompanied by a robust Transport Assessment (TA) which has considered and addressed the highway issues relating to the provision of a new Primary School and comment as follows:

“Traffic Generation and Impact

Since this is a new school, the TA has estimated the likely number of pupils and staff travelling by car by considering the modal split of other schools in the local area. This has resulted in a predicted 172 vehicles generated by pupils and 27 staff vehicles arriving / departing each school day. Traffic surveys of the local highway network, in particular New House Lane and Haynes Road, have been undertaken and whilst the former is busy at peak school start and finish times with around 600 vehicles in both directions, Haynes Road is comparatively lightly trafficked with around 100 vehicles in total. Both of these roads are not considered to be operating anywhere near capacity and can accommodate the additional traffic even if the percentage increase in traffic can be considered to be high. However, all traffic to the school will need to travel along Wescott Avenue which is relatively narrow at 5.0m wide which, together with parking that already exists and could increase in the future, it is considered that this could result in congestion and highway safety hazards once the school is operating to full capacity. In this respect it has been agreed with the applicant that Wescott Avenue between the school entrance and Haynes Road should be widened to 6.0m wide together with junction improvements at the Haynes Road junction, and that these works should be completed before more than 210 pupils attend the school.

There is no significant crash record in the vicinity.

Parking

In accordance with KCC Parking Standards (SPG4) for a primary school there should be a maximum of 1 space per member of staff + 10%. For 38 staff this would mean a maximum requirement of 42 spaces plus a requirement for dropping off/picking up. The proposal provides for 49 marked out parking bays together with an additional 31 dropping off/picking up spaces. A parking survey covering the roads within 200 metres of the site demonstrated that there were a minimum of 59 on-street parking spaces in addition to those being provided on-site. Given that the predicted number of staff likely to travel by car is 27 this would enable a relatively high number of onsite spaces (for a school) - 53 - to be available for short term stopping even when the school is at full capacity. This is considered to be adequate and unlikely to result in inappropriate parking, congestion or highway safety issues on the surrounding highway network. It must be considered that the demand for spaces will only generally occur for short periods in the morning and mid-afternoon and only during school term times and, whilst it must be accepted that there will be a certain level of disruption to the local residents at these times, when

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considering the recommendations of NPPF, particularly Para. 32, cannot be considered to be severe.”

**The County Council's School Travel Plan Advisor** raises no objection to this application. It is considered that the Transport Assessment submitted with the application is very thorough and covers all aspects that would be expected to be seen at this stage of a new school build. Should permission be granted, a fully informed Travel Plan should be submitted (via the County Council's Jambusters System) for approval once the school is in operation.

**Sport England** objects to this application and comments as follows:

“While we acknowledge the topography of this site as shown by the sections provided by the applicant, it has been proven in the past that the field is suitable for sport at amateur level at least due to the fact that the school has clearly previously used it for pitch sports. It remains unclear what has changed since the field was last used for pitch sports in order to make it now incapable of forming a playing pitch.

The gradient shown on the provided sections is not considered to be so severe as to make the land incapable of forming any playing pitch, particularly for school/amateur level. No other evidence has been provided as to why the site is no longer suitable for pitch sports in its entirety.

I also note the information on the Landscape Plan regarding the design and makeup of the proposed AWP. However, I remain of the opinion that, due to the proposed amount of playing field to be lost, this is not considered to appropriately balance out the loss of flexible grass playing field, in light of the fact that I do not consider the playing field proposed to be lost to be incapable of forming a playing pitch. The NPPF states that playing fields should not be built on unless the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality; this application does not satisfy this test as the AWP is clearly far smaller than the playing field land proposed to be lost.”

**Environment Agency** raises no objection to the proposed development subject to a condition regarding ceasing work should previously unidentified land contamination be found. Advice to the applicant is provided with regard to the disposal of waste material, and such advice could be relayed by way of an informative.

**The County Council's Biodiversity Officer** raises no objection to this application and is satisfied that sufficient ecological survey work has been undertaken to demonstrate that protected species would not be affected by the proposed development.

**The County Archaeologist** raises no objection to the application subject to a condition being placed on any grant of planning permission requiring the securing of the implementation of a programme of archaeological field evaluation works, to be undertaken in accordance with a written specification and timetable which should be

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submitted for prior approval, and further archaeological investigation, recording and reporting determined by the result of the evaluation.

**The County Council's Flood Risk Management Team (SuDs)** raises no objection to the application subject to the imposition of conditions requiring the submission and approval of a detailed Sustainable Surface Water Drainage Scheme and subsequent details of the implementation, maintenance and management of the approved Sustainable Surface Water Drainage Scheme, and a further condition controlling the infiltration of surface water drainage into the ground (to ensure that there would be no unacceptable risk to controlled waters).

#### **Local Member**

24. The local County Members, Mr Dhesi and Dr Sullivan, were notified of the application on 20 June 2017.

Dr Sullivan has commented as follows:

"I do not object to the principle of this scheme, as primary school places are desperately needed in the area.

I do object to the access arrangement of the primary school. Members of the Committee must be made aware that the nearest school (Shears Green Junior School) has 475 pupils on roll, with another infant school on the same site with 361 pupils on roll. Already there are many issues with parents being able to drop off their children safely in the area. Now the new St Georges Primary school will be not 500m away and will be using the same roads at the same time of day.

I have serious safety concerns that a child may be injured due to increased car usage in dropping their children to school. While some parents have the time to walk their children to school, most have jobs to get to or have children in different schools so are forced to use their cars, especially given how parents are expected to deliver their children to the school land which will require parents to park.

Should the access to the new school come from another road, such as Wrotham road or via the Morrison's roundabout (through the new housing scheme that has been granted OUTLINE planning consent) this would ease the anticipated increased pressure. Please consider this application carefully regarding the entry route and drop off area of this school."

#### **Publicity**

25. The application was publicised by an advertisement in a local newspaper, the posting of 5 site notices and the individual notification of 141 residential properties.

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#### **Representations**

26. At the time of compiling this report, one letter of representation from a local resident has been received. The main points raised are summarised as follows;
- It is understood that Westcott Avenue is to be widened. The road is very quiet with good parking;
  - Due to increased parking at peak school times, will dropped kerbs be provided?
  - Interest is also expressed in the time frame for the provision of the school as they have a young child.

#### **Discussion**

##### Introduction

27. In considering this proposal regard must be had to the Development Plan Policies outlined in paragraph 22 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 new National Planning Policy Framework (NPPF), and other material planning considerations arising from consultation and publicity.
28. In this case the key determining factors, in my view, are the principle of the development, access and highways matters, design, massing and siting including landscaping of the site and loss of playing field, and the policy support for the development of schools to ensure that there is sufficient provision to meet growing demand, increased choice and raised educational standards, subject to being satisfied on other material considerations. In the Government's view the creation and development of schools is strongly in the national interest and planning authorities should support this objective, in a manner consistent with their statutory obligations. In considering proposals for the creation, expansion and alteration of schools, the Government considers that there is a strong presumption in favour of state funded schools, as expressed in the National Planning Policy Framework and reflected in the Policy Statement for Schools. Planning Authorities should give full and thorough consideration to the importance of enabling such development, attaching significant weight to the need to establish and develop state funded schools, and making full use of their planning powers to support such development, only imposing conditions that are absolutely necessary and that meet the tests set out in paragraph 206 of the NPPF.

##### Principle of the Development

29. There are no specific policy designations which apply to the school site (apart from the access road which runs across a small area of the land designated under Policy CS21 of the Borough Councils Core Strategy) but it clearly has an established education use. As outlined in paragraph 6 of this report, the applicant advises that there is a large predicted demand for school places within Kent, and that general overall expansion is required to meet that need. I am further advised that, as a faith school, the secondary school has been a strong driver in wanting to deliver 'through school' opportunities on a

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shared site. Therefore, the proposed school would not only meet the identified demand for additional local primary school places, but also meet the need for Church school places across the Gravesham area. The provision of a new primary school would also allow for greater parental choice and would ensure that there is local provision for places to meet future needs, particularly in considering future local housing developments. This clearly accords with the Policy support for the provision of school places and the strong presumption in the favour of the development of state funded schools, as set out in paragraph 28 above.

30. As summarised in paragraph 23, the Borough Council accepts the principle of the provision of a primary school, and no objections have been raised to the principle of locating the school in the location proposed. However, concerns have been raised with regard to the accuracy and extent of the Transport Assessment, the proposed access arrangements, loss of playing field and general amenity matters. These matters will therefore be considered and discussed in the following sections of this report.

#### Access and Highway Matters

31. Both the Borough Council and the local County Member, Dr. Sullivan, have expressed concern over the location of the proposed access into the site and consider that access should be via alternative routes, either via Wrotham Road or through the adjacent Coldharbour Road housing site. Members are reminded that the Committee must consider the merits and acceptability, or otherwise, of the proposal as submitted, which in this case is considered to be acceptable by Kent County Council Highways and Transportation (H&T) and has not met with objection from local residents. However, for completeness I will assess the merits of both of the suggested options.
32. The applicant advises that to provide an access via Wrotham Road would result in the loss of the secondary schools playing pitches and would be an over engineered solution, incurring significant costs. H&T also agree that such an access would be impractical due to the distance and, more importantly, topographical difficulties as the site is considerably lower than Wrotham Road. It may also involve land not in the control of the applicant. More importantly, H&T advise that it is undesirable to introduce new access junctions onto busy classified roads such as Wrotham Road if a suitable alternative is available. Following further consultation with the Borough Council, it has accepted that access via Wrotham Road would not be a viable option for the reasons outlined above, and I also consider that to be the case.
33. With regard to access via the adjacent Coldharbour Road housing site, it is first important to note that at the time of writing this report outline planning permission is yet to be granted. As outlined in paragraph 4 of this report, the outline planning application (reference GR/20141214) for the development of the 17.46ha site to provide 400 dwellings and associated infrastructure and access was considered at the Borough Councils Regulatory Board on the 3 June 2015 where Members resolved to grant outline planning permission. However, the Section 106 Agreement is yet to be finalised, delaying the issuing of the planning permission. It should also be noted that as an outline planning application, reserved matters applications would need to be submitted and approved before works could commence on site. Works are not close to being able to commence and there is no guarantee that the development would be delivered and,

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as such, to coordinate the two developments would result in significant delays to the delivery of the primary school and the provision of educational places that are required for 2018.

34. Although the Borough Council express concern about the lack of information regarding the relationship between the proposed school and the Coldharbour Road housing site, I am advised by the applicant that the provision and phasing of the proposed primary school is not dependent on the Coldharbour Road development coming forward. There is an identified need for primary school places, and the phasing of the development would be driven by intake figures, in addition to the availability of public finances. This development is not reliant on the Coldharbour Road housing development and, as a separate detailed planning application, should be considered on its own merits in any instance.
35. Further to this, H&T advise that the spine road through the Coldharbour Road housing site, which would have a spur off the existing roundabout that provides access to Morrisons to the south, may not extend up to the primary school site or link with Westcott Avenue in any instance as 1) it is not proposed in the outline application and 2) it would have to cross land owned by the County Council. Secondly, H&T have advised that in the case that the spur road would end up being linked to Westcott Avenue, it may be as a bus only link to prevent the road becoming a rat run. In considering all of the above, I am satisfied that at this time access via the yet to be approved housing development would not be a viable option.
36. As stated in paragraph 31, H&T raise no objection to this application subject to the imposition of various conditions which will be discussed and addressed in the following paragraphs. However, with regard to the access point as proposed, this is considered by H&T, as the Highway Authority, to be acceptable in terms of highway safety, and I am also of the view that the location of the access is acceptable in general amenity terms. However, this is subject to the offsite highway works proposed, including the widening of the existing footway along Westcott Avenue to link with the footway network in Lanes Avenue to the south (phase 1), the widening of Westcott Avenue to the north of the school access to 6 metres to better accommodate two way traffic (phase 2), and subsequent realignment of the parking and kerb-line to the west of Westcott Avenue and kerb-line improvements at the junction with Hayes Road (phase 2). As required by H&T however, should Members be minded to grant permission, full details of the off site highway works (which would need to be agreed under a Section 278/Section 38 Agreement with H&T) should be submitted and approved prior to the commencement of the development, and thereafter be implemented prior to expansion in the school roll to over 210 pupils (over 1FE). Those details would include full details of the visibility splays, as requested by the Borough Council. Subject to those matters being covered by appropriately worded planning conditions, I would raise no objections to the location of the proposed access point into the site.
37. The Borough Council also expresses concern about the highway impacts of the proposal in terms of traffic generation and subsequent congestion and parking in local roads. As outlined in paragraph 3 of this report, in addition to St Georges Secondary School (which is accessed via Meadow Road to the north of the application site), Shears Green Infant School and Shears Green Junior School are located approximately

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200 metres (as the crow flies) to the south west of the proposed primary school access. The Borough Council and the local County Member Dr. Sullivan express concern over the accuracy of the submitted Transport Assessment and consider that there would be serious safety implications should additional traffic be added to these local roads.

38. In terms of highway safety on the roads in the locality, H&T advise that the 5 year crash record indicates that there has been one serious crash in Packham Road, outside Shears Green Primary School, in 2013 where a pupil of the school was injured by a car reversing at low speed, and a slight injury in New House Lane involving a moped turning into St Lawrence Square. H&T states that these are the only incidents that occurred during school peak travel times and conclude that on that basis they do not consider that there are any existing highway safety issues in the area.
39. With regard to the accuracy of the submitted Transport Assessment (TA), H&T consider the submitted document to be robust, using accepted methodologies to assess the existing highway conditions and to address the highway issues relating to the provision of a new school. As outlined in section 23 of this report, H&T state that since this is a new school, the TA has estimated the likely number of pupils and staff travelling by car by considering the modal split of other schools in the local area. This has resulted in a predicted 172 vehicles generated by pupils and 27 staff vehicles arriving/departing the proposed school each school day. Traffic surveys of the local highway network, in particular New House Lane and Haynes Road, have been undertaken and whilst the former is busy at peak school start and finish times with around 600 vehicles in both directions, Haynes Road is comparatively lightly trafficked with around 100 vehicles in total. H&T consider that both of these roads are not operating anywhere near capacity and could accommodate the proposed additional traffic, even if the percentage increase in traffic can be considered to be high.
40. Further to this acceptance that the local road network could accommodate the additional traffic movement generated by the proposed primary school, it is also important to note that significant on site pick up/drop off and parking facilities are proposed. As detailed in paragraph 14 of this report, the proposed school car park would provide 27 staff car parking spaces, 19 visitor/parent spaces and 3 accessible spaces (a total of 49 parking spaces), in addition to two drop off/pick up zones within the car park and a further two zones either side of the access road which would provide 31 additional parking opportunities on the site.
41. In accordance with KCC Parking Standards for a primary school it is recommended that a maximum of 1 space per member of staff + 10% be provided. For 38 staff, as proposed in this case when at full 2FE capacity, this would mean a maximum requirement of 42 spaces plus a need for dropping off/picking up spaces. The proposal provides for 49 marked out parking bays together with an additional 31 dropping off/picking up spaces. The submitted TA includes a parking survey which covered the roads within 200m of the application site, and demonstrated that there were a minimum of 59 on-street parking spaces in addition to those being provided on-site. Given that the predicted number of staff likely to travel by car is 27, that would enable a relatively high number of onsite spaces - 53 - to be available for short term stopping even when the school is at full capacity. This is considered by H&T to be adequate and unlikely to result



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in inappropriate parking, congestion or highway safety issues on the surrounding highway network such as to warrant withholding planning permission.

42. It must also be noted that the demand for spaces will only generally occur for short periods in the morning and mid-afternoon and only during school term times. Whilst it is accepted that there would be a certain level of disruption to local residents and road users at these times, when considering the recommendations of NPPF, the impacts cannot be considered to be severe (which is the key test in the NPPF). In addition, other measures can be included and managed in the School Travel Plan such as staggered start/finish times which could further aid in reducing congestion and maximising parking availability. Since it is proposed that the school would increase the pupil numbers over a relatively long period this would give a greater opportunity to manage and mitigate any matters arising. In considering the onsite provisions as discussed above, which it should be noted is considerably more generous than at the majority of existing schools, and the views of H&T, I am of the view that the onsite provision of car parking and pick-up/drop-off at this site is above that required by the necessary parking standards. However, should permission be granted, a condition of consent would require the car parking, access and drop off area to be provided prior to occupation of phase 1 of the development. Thereafter, annual monitoring of the onsite arrangements to allow the balance of staff parking and dropping off spaces to be adjusted if necessary should be undertaken. In my view, that monitoring should be undertaken as part of the annual review of the School Travel Plan.
43. The submitted TA also includes an outline School Travel Plan which is considered by the County Council's Travel Plan Advisor to be very thorough, covering all aspects that would be expected to be seen at this stage in the application process. However, it is considered that a fully informed Travel Plan should be submitted (via the County Council's Jambusters System) for approval once the school is in operation. Although H&T request that a Travel Plan be submitted prior to occupation, I consider that as the outline Plan is thorough, and that pupil numbers for the first year would be low (60-90), that the submission of the detailed Travel Plan be required within 6 months of first occupation of the school. Should members be minded to grant permission, a condition of consent would be imposed in that regard, including a requirement to monitor onsite car parking allocation (as referred to above).
44. Gravesham Borough Council has also queried some of the onsite highway design methods, such as car parking space sizes and the width of footway/cycleways. Although these matters are an onsite management issue as they are not on the public highway, I can confirm that the parking bay sizes comply with the current KCC H&T standards at 5.0m x 2.5m. Further, H&T advise that the shared footway/cycleway alongside the access road is 3.0m wide and considered adequate, complying with the appropriate standards. I therefore consider the submitted details to be acceptable. With regard to the Borough Council's concerns regarding conflicting vehicle movements (cars vs delivery vehicles etc), I consider this to be an onsite management issue and not something that the Planning Authority can control.
45. With regard to pedestrian access, the Borough Council is concerned that the proposed pedestrian link to the secondary school could displace existing school traffic from New House Lane and Meadow Road to Westcott Avenue, Lanes Avenue and Haynes Road.

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However, H&T consider that the link to the secondary school would encourage more secondary school pupils to walk to school since some would have an easier route from nearby housing developments. Whilst it is accepted that some parents could drop secondary school pupils close to the new primary school, traditionally secondary school pupils are more likely than primary school pupils to travel independently to school through walking or by bus. H&T do not consider that this is a significant concern, and I am of the same view in this instance.

46. With regards to cycle and scooter parking, the applicant is proposing to provide a minimum of 10 cycle parking spaces and secure scooter parking. The Borough Council and H&T require further details of the secure and weatherproof cycle and scooter parking to be provided pursuant to condition, should permission be granted, and that such facilities thereafter subsequently be provided prior to occupation. Should Members be minded to grant permission, I consider it appropriate to require such details pursuant to planning condition.
47. Lastly, the Borough Council raises concern over the potential highway impacts resulting from out of hours community use of the school facilities. Although the amenity and sporting impacts of such use will be discussed later in this report, from a highway point of view the impacts are considered likely to be minimal. Community use of the AWP pitch would initially be arranged and accessed via the secondary school, which already offer out of hours community facilities. However, the applicant advises that both schools would continually review that arrangement and that the option of using the primary school car park could be explored if necessary. That is something that could be covered within the School Travel Plan as part of the annual review process. I am satisfied that the limited level of community use proposed is unlikely to lead to additional on street car parking, or have an undue impact on the local highway network.
48. In summary, H&T, as the Highway Authority, state that it is not considered that the impact of the school proposal is likely to lead to “severe” highway safety or congestion problems, although it is accepted that, as with any school, particularly primary schools, some local disruption may result but this is of short duration and only during part of the year. In considering the above, and in light of the views of H&T, I consider that subject to the imposition of conditions regarding the submission of full details of the off-site highway works and their subsequent completion, submission of an updated Travel Plan, submission of details of secure cycle and scooter parking, and the provision and permanent retention of the access, car parking and drop off areas as shown on the submitted plans prior to occupation of Phase 1, that the development would not have a significantly detrimental impact overall on the local highway network. I therefore see no overriding reason to refuse this application on highway and access grounds.

#### Design, Massing and Siting including Landscaping of the Site and General Amenity Matters

49. Apart from the playing field implications of the siting of the proposed primary school and the subsequent Sport England objection, which will be discussed later in this report, the design, massing and siting of the development as proposed has not met with objection. The proposed site layout, which proposes car parking and public spaces to the western site frontage, followed by the school building which would be cut into the site to reduce its height and massing, with amenity space and the floodlit AWP to the rear, results in a

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development which would not, in my view, adversely affect local amenity, including the amenity of local residents. The building, when completed, including the second phase, would be over 50 metres from the rear elevation of the closest property in Haynes Road, but due to the diagonal orientation of the building would be over 70 to 100 metres from the rear of Haynes Road properties in the most part. The existing boundary planting, and the rear access road to those properties, provide a good degree of separation and screening, and combined with the orientation of the building would, in my view, mean that local properties would not be overshadowed or overlooked by the development as proposed.

50. The design and massing of the proposed primary school building would, in my view, sit well within the site, using the level drop across the site to mitigate the massing when viewed from the site frontage/properties in Haynes Road. The building would sit well against the back drop of the existing secondary school buildings, and would not be out of scale with local two storey residential development. The applicant has provided a significant level of detail within the planning application documentation regarding the external materials, including the exact specifications and colour finishes. A summary of these materials is provided in paragraph 23 of this report. The Borough Council have requested that further details of external materials be submitted pursuant to planning condition, in addition to a further condition requiring details of plant/equipment on the roof and in the service yard. The applicant has shown the proposed roof plant on the application drawings, and I am satisfied that as long as plant is contained within the designated service yard that additional details are not required. Further, the detailed external materials specification that has already been submitted provides all of the information that is required. However, should Members be minded to grant permission, I would recommend that conditions of consent be imposed to ensure that the development is undertaken in accordance with the submitted details, and that any deviation from the approved specifications would require further approval.
51. As set out in paragraphs 8 and 9 of this report, apart from a small section of boundary planting that would need to be removed to accommodate the new access road into the site, the applicant advises that all other boundary trees and planting is to be retained. A total of 11 trees are proposed to be removed to facilitate the development, in addition to three trees which are to be removed due to poor health. The application documentation includes detailed landscaping proposals which identify the location for the planting of over 80 replacement/additional trees, a minimum of 65% of which would be native species. Hedge planting and wildflower planting is also proposed, including the provision of an enclosed wildlife garden. Tree protection plans are also included within the application details.
52. Further, the southern and western boundaries of the proposed primary school would be demarcated and secured by the existing fencing which currently marks the boundary of the secondary school site. The northern and eastern boundaries would be secured with black 1.8m high vertical bar fencing, with tree planting and hedging proposed to the boundaries to soften the appearance of the fencing. The AWP is proposed to be enclosed with 4m high green weld mesh fencing. I note that the Borough Council requests that further details of landscaping works, tree protection measures, and boundary treatments be submitted pursuant to planning condition. I am, however, satisfied that the application documentation includes sufficient information in those

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regards, and that requiring further details would merely result in the same information being resubmitted at a later date. Should Members be minded to grant permission, I would recommend that conditions of consent be imposed to ensure that the development is undertaken in accordance with the submitted details, and that any deviation from the approved landscaping and/or fencing specifications would require further approval.

53. Community use of the floodlit AWP is proposed, as outlined in paragraph 17 & 21 of this report, and the sporting implications of such use will be discussed later in this report. However, with regard to amenity implications of the proposed lighting and out of hours use, I would advise that the proposed AWP would be located to the rear of the primary school building, screened by the building itself and existing and proposed landscaping and tree planting. The AWP is proposed to be floodlit by 8 luminaires, mounted on six 8m high floodlight columns, with an average illuminance across the pitch of 382 lux. Hours of use are proposed to be 0800 to 2200 hours Mondays to Fridays inclusive, and 0900 to 1900 hours on Saturdays, Sundays and Bank or Public Holidays. Given the location of the facility and the degree of separation from local properties, and in considering that access would be via the secondary school which already opens its facilities for community users out of school hours, I do not consider that community use of the AWP would significantly adversely affect the amenity of local residents.
54. However, for clarity, and as limited details regarding the community use of the AWP have been provided, and as requested by the Borough Council, I do consider that further details of community use of the AWP, and any other facilities that the school would wish to open up for out of hours use, should be submitted pursuant to condition. Therefore, should permission be granted, further details of community use would be required for submission and approval. In addition, should permission be granted it is essential that the lighting is installed and set up in strict accordance with the submitted lighting specification, and that the switching mechanisms proposed are implemented to ensure that lighting is not left on when the pitch is not in use. Hours of use would also be strictly controlled, with lighting not in use any later than 22.00 Monday to Friday, and 19.00 on Saturdays, Sundays, and bank holidays. Subject to these matters being controlled by planning condition, I am satisfied that the proposed floodlighting would not have a significantly detrimental effect on the amenity of the immediate locality.
55. In addition to the lighting of the AWP, as set out in paragraph 20 of this report, the applicant has provided details of the external lighting scheme for the whole site, including access and car parking areas and general perimeter and security lighting. The lighting levels proposed are in accordance with the relevant guidance, and the lighting would be controlled by a combination of photocell sensors and time clocks. Again, I am satisfied that the application documentation includes sufficiently detailed information with regard to the proposed lighting of the site to negate the need for further details to be submitted pursuant to condition. However, should Members be minded to permit, I would recommend that a condition of consent be imposed to ensure that the development is undertaken in accordance with the submitted details, and that any deviation from the approved lighting specification would require further approval.
56. Finally, the Borough Council expresses concern about the position of the school gate at the entrance and the potential for unauthorised access on to neighbouring Borough

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Council land and concern over fly tipping. This is a matter for the applicant to address in consultation with the Borough Council regarding land transfer matters, and a future site management issue. The Borough Council further requests that an informative be added requesting that the applicants discuss Crime Prevention through Environmental Design (CPTED), Secured By Design (Schools) and BREEAM requirements with Kent Police. Should permission be granted, that informative would be added to the consent. Members will note however that an array of photovoltaic panels are proposed on the hall roof, and that the building has been designed with sustainability in mind in terms of building orientation and solar gain.

Playing Field Provision

57. This application proposes development on an area of mown grass currently used by St George's CofE School (secondary school) as amenity space. Sport England has objected to this application as they consider that it does not accord with paragraph 74 of the NPPF or any of the exceptions of Sport England's Playing Fields Policy. That Policy states that Sport England would oppose any development that would lead to the loss of, or would prejudice the use of, all or any part of a playing field, or land last used as a playing field unless in their judgement it meets one of the 5 specific exception circumstances. These are (E1) that there is an excess of playing field provision in the catchment area (illustrated by a quantified and documented assessment); (E2) that the development is ancillary to the principal use of the site as a playing field (i.e. changing room facilities); (E3) that the development is on land that is incapable of forming, or forming part of a playing pitch; (E4) that the playing field to be lost would be replaced by a playing field of equivalent or better quality in a suitable location; (E5) or that the development is for indoor or outdoor sports facility which would be of sufficient benefit to outweigh the detriment caused by the loss of the playing field. The Borough Council also share Sport England's concerns regarding the impact of the proposed development on existing sports facilities, whilst supporting the provision of the floodlit AWP, a facility for which there is a shortfall within the Borough.
58. The applicant advises that the secondary school benefits from a significant amount of existing good quality playing pitch space, which would enable the school to continue to provide its pupils with adequate sports facilities and playing pitches, whilst also accommodating the primary school development. Moreover, the applicant considers that the application site is on land currently incapable of accommodating a formal playing field due to the topography of the site. Although the site has been used in the past for 5-a-side football and rounders, use of the site for sport ceased by 2013 due to the topography and the plentiful alternative space available on the secondary school site. I am advised by the applicant that the secondary school has 5.5 hectares of flat playing that is marked out with five football/rugby pitches, athletics track, cricket pitch and other field sports.
59. Sport England guidance (*Natural Turf for Sport*) states that a playing surface should be no steeper than 1:80-1:100 along the line of play, and 1:40-1:50 across the line of play. In this case, the application site falls approximately 7m from west to east with a gradient of between 1:25 and 1:34. Therefore, although the site has historically been used for informal sports use, I accept that it is not ideal for formal sports use, and that sufficient alternative sports facilities of a better quality are available on site in any instance.

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60. In addition, a floodlit AWP is proposed as part of this application which would also be available for use by the secondary school and the local community. The 3G pitch would have a playing surface suitable for under 10s football, three 5 a side pitches and mini hockey. The Borough Council acknowledge that there is a need for a floodlit AWP within the Borough, and therefore the proposal clearly provides a needed facility of better quality than that of the existing unusable (for formal sports) space. Arguably, the development proposed would meet with exception E4 in this instance. In addition, by providing an all weather surfaced floodlit facility to serve the proposed primary school, the secondary school and the local community, the development arguably is providing a facility which would benefit the suitability and availability of local sports facilities, outweighing the detriment of any loss, meeting the requirements of exception E5.
61. In my opinion the applicant has demonstrated sufficiently that the application site has significant limitations for formal sports use, that the secondary school has plentiful good quality playing field which meets the schools requirements, and that the provision of the floodlit AWP would be of a benefit to both schools and the local community. It is therefore considered that in this instance, and notwithstanding Sport England's objection, a pragmatic approach should be taken in dealing with this scheme given the identified need for a primary school and the benefits of co-location with the secondary school. Such an approach is supported by policy guidance in the NPPF, in seeking to provide a proactive and positive approach in considering applications that deliver development that widens choice in education provision. If Members agree with this and are minded to grant permission, the application would need to be referred to the Secretary of State due to Sport England's objection.

#### Biodiversity

62. With regard to ecology and biodiversity matters, an Ecological Impact Assessment and Precautionary Mitigation Strategy have been submitted which conclude that the development would not have a detrimental impact on biodiversity, subject to the development being undertaken in accordance with the recommendations set out within the reports. The County Council's Biodiversity Officer is satisfied with the level of information provided. Should permission be granted, a condition of consent should be imposed requiring that the development is undertaken in accordance with the recommendations and precautionary measures as detailed within the submitted reports. In addition, I consider that a further condition of consent should be imposed to ensure that there is no tree removal during the bird breeding season, unless supervised by a suitably qualified ecologist. Subject to the imposition of the conditions outlined above, I am of the view that the development would not have a detrimental impact upon ecology/biodiversity interests.

#### Drainage and Land Contamination

63. The Environment Agency and the County Council's Flood Risk Team (SuDs) both raise no objection to this application subject to the imposition of conditions. The Flood Risk Team require the submission of a detailed Sustainable Surface Water Drainage Scheme and the further submission of details of the implementation, maintenance and management of the sustainable drainage scheme. The Flood Risk Team also require a

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further condition to control surface water drainage into the ground (there should be no discharge to ground within a Source Protection Zone unless the discharge is clean and uncontaminated i.e. roof water). Should permission be granted, the conditions as outlined above would be imposed upon the consent to ensure that drainage of the site was both sustainable and effective.

64. With regard to land contamination, the Environment Agency requests a condition be attached to any consent regarding how works should proceed should any contamination be found during construction. Therefore, should permission be granted, a condition would be imposed covering this matter.

Archaeology

65. The County Archaeologist has concluded that in order to secure the appropriate level of evaluation and mitigation of archaeological potential at the site, a condition of consent should be imposed. It is requested that no development takes place until the applicant has secured the implementation of archaeological field evaluation works and any subsequent archaeological investigations, to be undertaken in accordance with a written specification and timetable which should be submitted for prior approval. I consider that the suggested condition would be an appropriate requirement in ensuring an acceptable level of evaluation and mitigation of the archaeological potential of the site. Therefore, subject to the imposition of the required condition, I do not consider that this proposal would have a detrimental impact on archaeological interests.

Construction Matters

66. Given that there are neighbouring residential properties, if planning permission is granted it would, in my view, be appropriate to impose a condition restricting hours of demolition and construction to protect residential amenity. I recommend that works should be undertaken only between the hours of 0800 and 1800 Monday to Friday and between the hours of 0900 and 1300 on Saturdays, with no operations on Sundays and Bank Holidays. It is also good practice on school sites for contractors to be required under the terms of their contract to manage construction traffic/deliveries to minimise conflict with traffic and pedestrians at the beginning and end of the school day.
67. I also consider it appropriate that details of a Construction Management Strategy be submitted for approval prior to the commencement of each phase of the development. That should include details of the location of site compounds and operative/visitors parking, details of site security and safety measures, lorry waiting and wheel washing facilities, details of how the site access would be managed to avoid peak school times, and details of any construction accesses. Such a strategy would also address the conditions required by Highways and Transportation and the Borough Council with regard to the construction of the development. Therefore, should permission be granted, a Construction Management Strategy for each phase of the development should be required pursuant to condition and the development would thereafter have to be undertaken in accordance with the approved strategy.
68. The Borough Council further request that a phasing document be submitted to detail how the construction of the school would relate to the construction of the wider

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Coldharbour Road housing site. However, I do not consider such a condition to be relevant or necessary as the primary school development is not within the proposed housing site boundary, nor would access be shared. In addition the County Council has no control over the timescales for the delivery of the housing development.

**Conclusion**

69. This proposal seeks to provide a new build two storey 2 Form Entry (2FE) Primary School with car park, playground, floodlit artificial pitch, and associated landscaping with a new access road, footpaths, highway improvements (including the widening of Westcott Avenue and the provision of a footpath link to Lanes Avenue) and service connections at St Georges Church of England School, Gravesend. In my view, the development would not give rise to any significant material harm and is in accordance with the general aims and objectives of the relevant Development Plan Policies. The development is in accordance with the principles of the National Planning Policy Framework and the Planning Policy Statement for Schools (2011). Subject to the imposition of the conditions outlined throughout this report, I consider that the proposed development would not have a significantly detrimental impact on the local highway network, provision of sport facilities or the amenity of local residents, and would accord with the principles of sustainable development as set out in the NPPF. 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**

70. 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 standard 5 year time limit for implementation;
- the development to be carried out in accordance with the permitted details;
- the development to be carried out using the external materials and colour finishes as specified within the planning application documents unless otherwise agreed;
- roof plant to be installed as shown on the submitted drawings unless otherwise agreed;
- external lighting to be provided in accordance with the submitted details unless otherwise agreed;
- boundary and internal fencing to be provided in accordance with the submitted details unless otherwise agreed;
- landscaping scheme, including additional tree planting, soft landscaping, hard surfacing, and ecological enhancements to be provided in accordance with the submitted details unless otherwise agreed;
- tree protection methods, as shown on the submitted drawings, to be adopted to protect boundary hedgerows and trees to be retained;
- development to accord with the recommendations and precautionary mitigation methods detailed within the submitted ecological surveys/reports;



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- no tree removal during the bird breeding season;
- the submission and approval of further details of community use relating to use of the indoor and outdoor facilities, including hours of use;
- use of the floodlighting limited to between the hours of 0800 and 2200 Monday to Friday, and to between 0900 and 1900 on Saturdays, Sundays and Bank Holidays;
- extinguishing of lighting when pitch not in use or 15 minutes of last use;
- lighting to be installed in accordance with approved details, and checked for compliance on site prior to first use;
- lighting levels not to exceed those specified within the application;
- submission and approval of full details of the off-site highway works (which would need to be agreed under a Section 278/Section 38 Agreement with KCC Highways) prior to commencement of the development, including visibility splays;
- completion of the approved off-site highway works prior to expansion in school roll to over 210 pupils (over 1FE);
- the submission and approval of a Travel Plan within six months of occupation, and thereafter ongoing monitoring and review, to include annual monitoring of the onsite car parking arrangement to allow the balance of staff parking and dropping off spaces to be adjusted if necessary and a review of car parking associated with community use;
- provision and retention of car parking, access (vehicular and pedestrian), pick up/drop off, circulatory routes and turning areas prior to the occupation of phase 1 of the development;
- the submission and approval of details of the secure and weatherproof cycle and scooter parking and subsequent provision prior to occupation;
- the submission and approval of a detailed Sustainable Surface Water Drainage Scheme and subsequent details of the implementation, maintenance and management of the approved Scheme;
- no infiltration of surface water drainage into the ground other than with the approval of the County Planning Authority;
- measures to control development should land contamination be identified;
- the implementation of archaeological field evaluation works and any subsequent archaeological investigations;
- hours of working during construction and demolition to be restricted to between 0800 and 1800 Monday to Friday and between the hours of 0900 and 1300 on Saturdays, with no operations on Sundays and Bank Holidays;
- the submission and approval of a construction management strategy prior to the commencement of each phase of the development, including details of the location of site compounds and operative/visitors parking, details of site security and safety measures, lorry waiting and wheel washing facilities, details of how the site access would be managed to avoid conflict with peak school times, and details of any construction accesses;

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

- 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

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necessary highway approvals and consents where required are obtained, including a Traffic Regulation Order.

- The applicant's attention is drawn to the letter from the Environment Agency in which advice is provided with regard to the disposal of waste material;
- The Borough Council advise that the applicant discuss Crime Prevention through Environmental Design (CPTED), Secured By Design (Schools) and BREEAM requirements with Kent Police.

Case officer – Mary Green	03000 413379
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Background documents - See section heading
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To: Planning Reps  
From: Highways Development Management Officer

Date 13<sup>th</sup> October 2017

Your Ref

Location: St Georges Primary School Westcott Avenue

Site visits were conducted from approximately 7:30 till 8:50 and 14:00 to 16:10 on Friday 13<sup>th</sup> October.

During these period Lanes Avenue became congested with parked cars primarily associated with the school run to the nearby Shears Green School, leaving little space for additional parking capacity. Allowing for disabled spaces and carriage crossovers at the peak there was perhaps 4 spaces remaining, within the survey area covered by the application during the morning period.



Lanes Avenue near Haynes Road.

It should be noted that the style of parking does not conform to the London Borough of Lambeth Parking Survey Method, instead a longer parking style is used for ease of access and egress.

With regards to Haynes Road all available parking south west of the Westcott Avenue junction was fully occupied by 8:45 again primarily associated with the nearby school, this also occurred during the afternoon collection period. It was also noted at times the lay-by adjacent to Lawrance Square. shopping parade had a combination of parallel and perpendicular parking, although it does not confirm to current standards for perpendicular parking as the spaces are short. Indeed the two marked disabled spaces at 4.6 metres long extend into the carriageway. To the north east there was only limited parking leaving more space available for additional vehicles, although this space reduced in the afternoon as parking spread.

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By 8:45 the majority of the parking was however perpendicular with parallel parking at either end of the lay-by. Within the perpendicular parking area, 26 cars were parked, two disabled parking spaces were unused and the area was full the same applies in the afternoon peak period.



Haynes Road Lay-By

Capacity could potentially be increased by marking out the on street parking bays, but alterations should be made to the highway to ensure that the bays conform to minimum standards. Also as some parents brought younger siblings with them, extra space is required to get these children into and out of a car, so there is merit in accepting reduced capacity but more desirable parking spaces to encourage (if marked) their use and providing the public with what they want, indeed need. There is also the question on whether there is scope to angle the spaces against the kerb further reducing capacity but ensuring no vehicle overhangs the carriageway. In any instance reverse parking should be encouraged so any loading/unloading from the boot (such as buggies) takes place pavement side and not in a live lane.

Returning to Lanes Avenue, there is evidence that the grass verge near Westcott Avenue is used either as a parking space or an overrun area to allow vehicles to pass. This is liable to be aggravated with any new development and conditions should be introduced to prevent it. It should be noted that surface tree roots are being damaged.



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During the visit it was noted that the deciduous trees near the development site were shedding leaves potentially making the area around the proposed access dangerous, particularly in wet or icy conditions.



Westcott Avenue

As this area is currently very lightly trafficked it may not be considered to be much of an issue. But with increase in both vehicular and pedestrian traffic no doubt it will require regular attendance to keep the area free of leaves and places a financial burden on the local authority that needs to be addressed.

Westcott Avenue did not appear to be used for the school drop off in the morning but in the afternoon at least seven cars associated with the school pick up were noted parked at one time. However there was space still available for on street parking.

The community Centre car park did not appear to be used in the morning whilst in the afternoon four vehicles were seen parked during the school pick up period.

The majority of roads in this area whilst able to accept on street parking become single track highways. This can result in conflict and congestion as opposing stream of traffic meet and have to pass one another with limited opportunities to do so between the parked cars, carriage crossovers and junctions forming the best passing places.

Haynes Road is the exception, but then near to the Shears Green School parking occurs on both sides of the road resulting in the same situation as the other roads

As a result of this visit, if the free flow of traffic is to be reasonably maintained, I believe the car parking survey undertaken by the applicant to be a gross over estimation of what is actually available.

Two schools in such close proximity are liable to result in significant congestion, competition for parking spaces as well as dangerous parking. Resulting in the drop off and pick up periods extending to the detriment of the local residents. It should be noted that the earliest arrival

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#### Appendix 1

observed for the school pick up was at approximately 14:30 and was in the perpendicular parking in Haynes Road. The pictures that following were taken during the afternoon of the 13th October:



Lanes Avenue junction with Haynes Road. (Both cars at the junction are parked)



Lanes Avenue link to Packham Road. Note the verge parking.

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Haynes Road early afternoon



Haynes Road looking towards Packham Road early afternoon

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Haynes Road school pick up approximately 15:15



Haynes Road perpendicular parking overhanging carriageway and looking towards Packham Road  
This was just prior to school pick up.



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Westcott Avenue during school pick up. Note one car in the lay-by can be discounted as it was used by the surveyor.



Lanes Avenue adjacent to Community Centre during school pick up.



Lanes Avenue junction with Haynes Road during the school pick up. The car across the Give Way line is parked

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Lanes Avenue junction with Westcott Road during school pick up.



Lanes Avenue south of Westcott Avenue looking south. Note the roof of the vehicle parked on the grass verge



Lanes Avenue link road to Packham Road at approximately 3pm. Note the pavement and verge parking.

L W Seaborn 13<sup>th</sup> October 2017