

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

Expansion of school from 1FE to 2FE and associated ancillary works at Seal CofE Primary School, Zambra Way, Seal – SE/18/01521/KCCRG3 (KCC/SE/0075/2018).

A report by Head of Planning Applications Group to Planning Applications Committee on 11th July 2018.

Application by Kent County Council (Property Services) for the erection of a two storey extension to the existing school to provide accommodation for an additional Form of Entry (1FE to 2FE), relocation of existing mobile classroom and the provision of a further temporary classroom (for 12 months), 18 additional car parking spaces, new hard court playground (including MUGA), associated landscaping and ancillary works at Seal Church of England Primary School, Zambra Way, Seal, Sevenoaks, Kent, TN15 0DJ – SE/18/01521/KCCRG3 (KCC/SE/0075/2018).

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

Local Member: Roger Gough

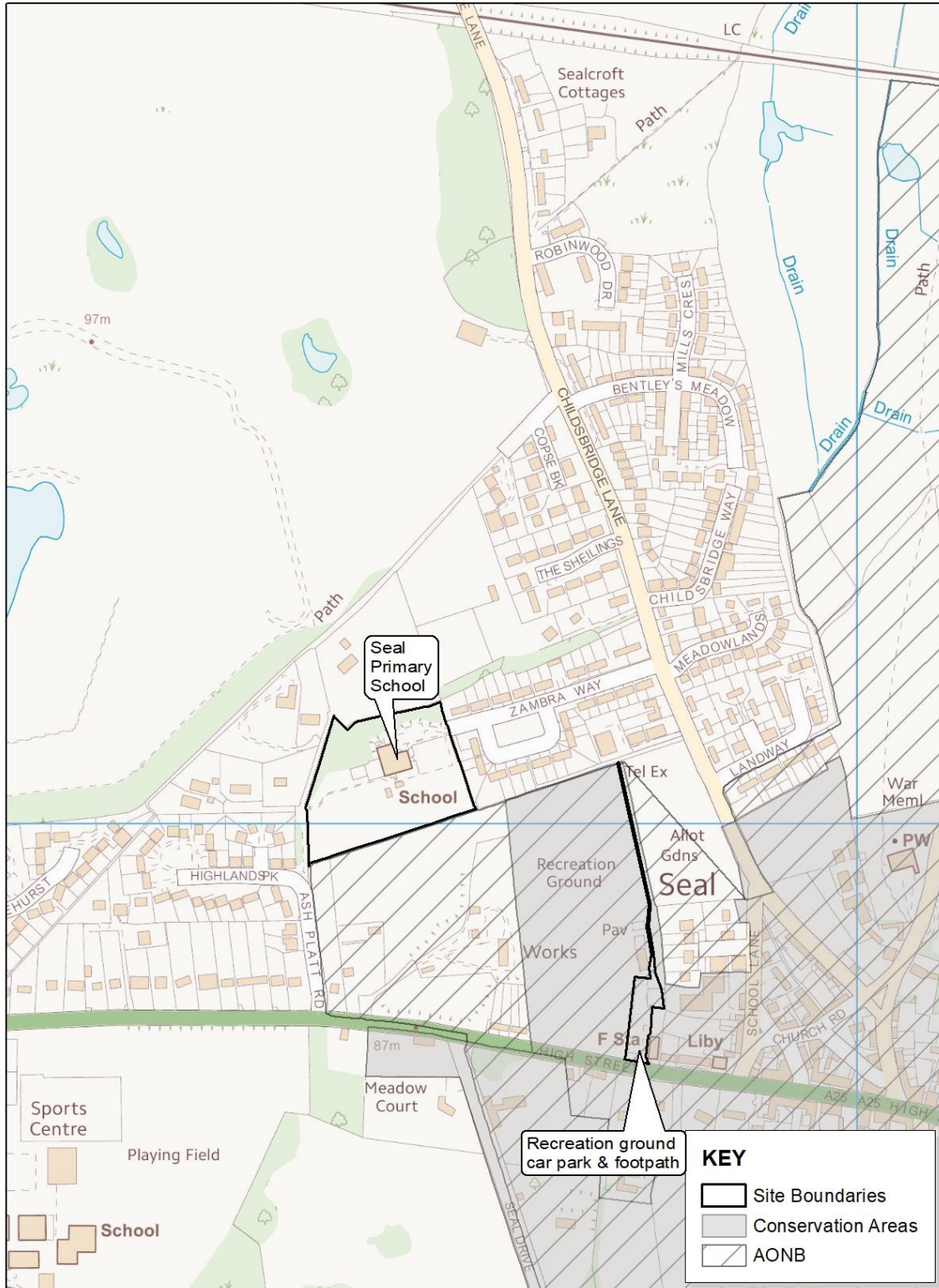
Classification: Unrestricted

Site

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

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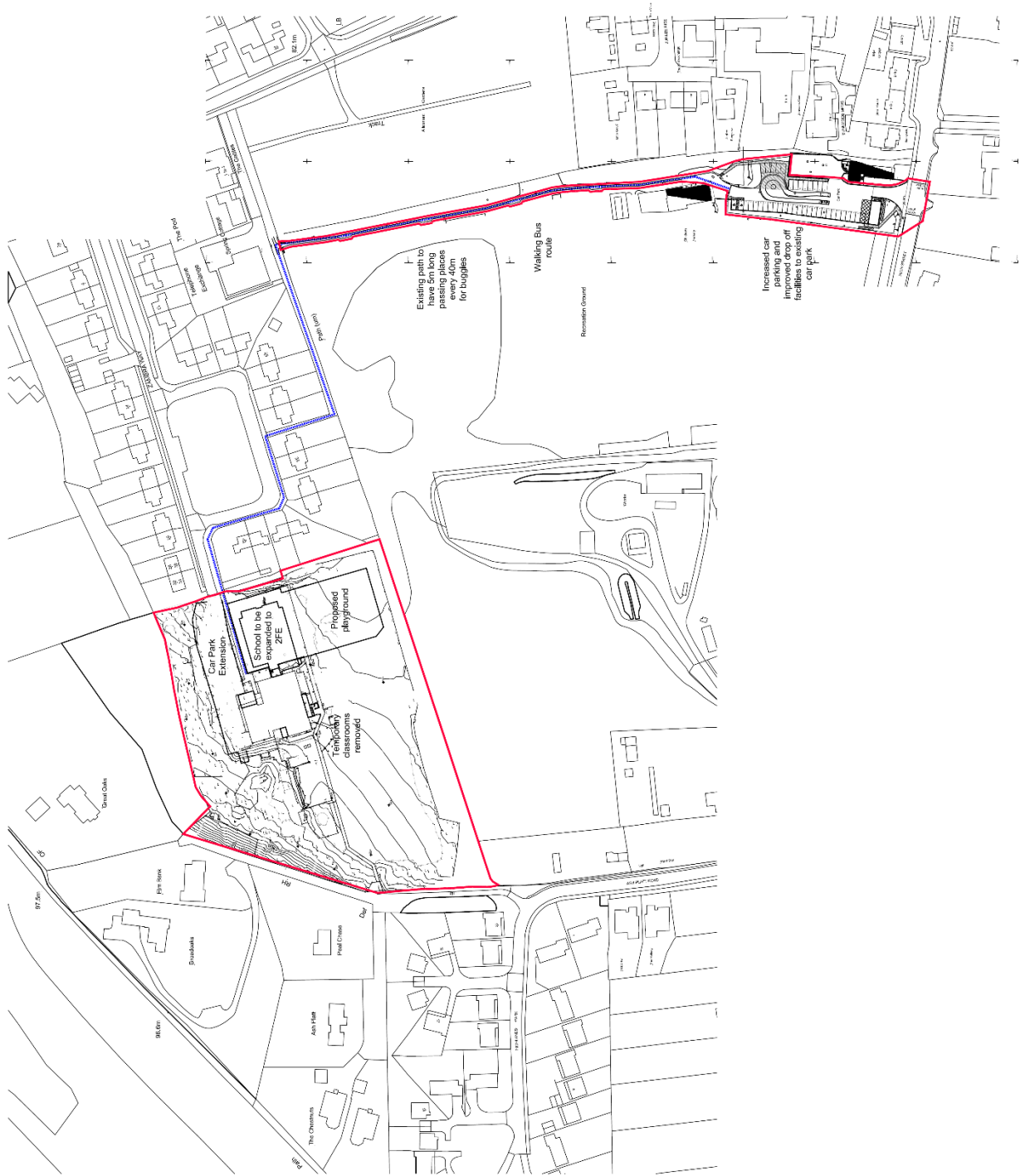
General Location Plan



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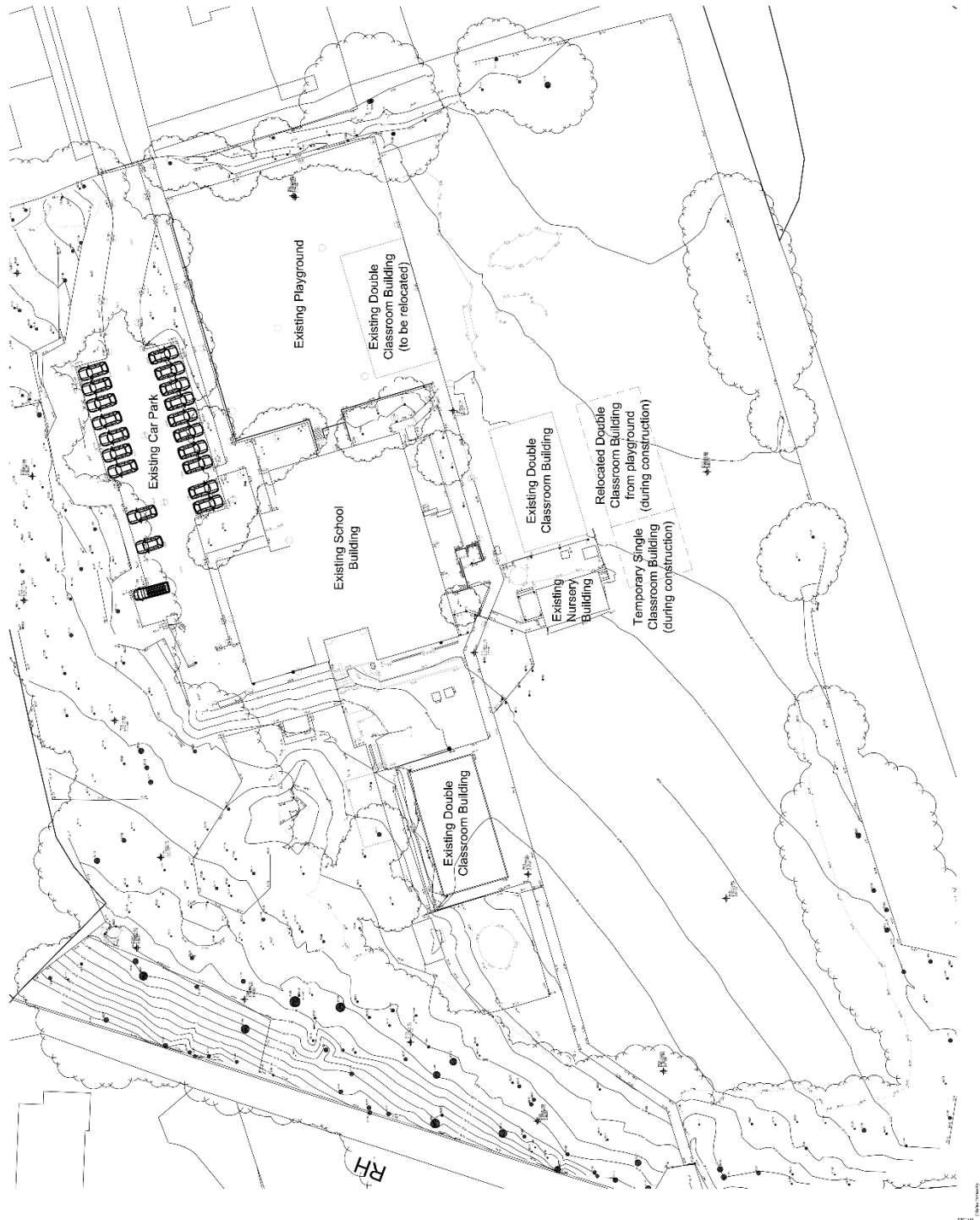
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Proposed Masterplan



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Existing Site Plan



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Proposed Site Plan



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Proposed Elevations



1 North Elevation
1:100



2 South Elevation
1:100



1 East Elevation
1:100



2 West Elevation
1:100

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Recent Site History

3. Seal Primary School has been the subject of a number of planning applications over the past 10 years, the majority of which have related to the provision of temporary modular classrooms to address a shortfall in classroom space on the site for the number of children on the school roll. In 2016 an application for a permanent solution was submitted (SE/16/1043) which related to the provision of a single storey extension to accommodate an increase in the school roll from 1FE to 2FE. This application was due to be reported to the Planning Applications Committee (PAC) in July 2016, however the applicant requested that the case be deferred to allow them time to give further consideration to the concerns raised by the community, and to explore the possibility of further mitigation, over and above the proposals already included in the application. In particular this related to the provision of additional off-site parking for parents.
4. A meeting was held in October 2016 between the applicant and Seal Parish Council to consider if there were any possible alternative sites where additional parking could be provided for parents, in order to alleviate congestion in the residential roads of Zambra Way, Ash Platt Road and Highlands Park. Six different options were discussed, which included three different parcels of land owned by Biffa, land at Highlands Park, land at Trinity School, and use of, or an extension to, the existing Seal Recreation Ground car park. Each site was assessed against a variety of parameters including size of site and parking capacity, owners' willingness to sell and negotiate, ground conditions, contamination, access to the development site and school, planning considerations, other considerations and cost.
5. The six alternative sites were investigated by the applicant's project team to determine whether they would be a viable and available option for additional car parking. A number of issues were encountered when examining these sites further, ranging from unwilling landowners, environmental issues such as ground contamination, the remoteness of the site from the school, or unsatisfactory access and safety concerns. The final site that was considered was the Seal Recreation Ground site, managed by Seal Parish Council. The study showed that the use of this site would not have required planning permission for a change of use, that it had a direct link to the school site through an existing pathway, and a car park survey had shown that there was capacity for it to be used as a drop off facility for the Primary School. However an agreement could not be reached with the Parish Council and therefore this option also remained unviable.
6. Following this assessment the Highways and Transportation team advised that whilst the school expansion had shown that the traffic and parking situation was likely to be worsened, they were not able to conclude that it would result in conditions that could be described as a 'severe impact on congestion or safety' – this being particularly the case when such impacts occur for short periods during the morning and afternoon and only during term time. The application was therefore taken back to the PAC in December 2016 with a recommendation to approve, but following a lengthy debate the application was refused for the following reasons:
 1. The proposal would represent inappropriate development in the Metropolitan Green Belt by reason of the scale and size of the extension and the increase in built form on the site, which would be harmful to and would not maintain the open character of the Green Belt, contrary to Policy GB8 of the Sevenoaks District Council

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Allocation and Development Management Plan, Policy L08 of the Core Strategy and paragraph 89 of the National Planning Policy Framework.

2. The proposed expansion of the school would result in an increase in school related traffic on surrounding roads without provision in place of adequate mitigation measures to offset the expected adverse travel impacts, contrary to Policy T1 of the Sevenoaks District Council Allocation and Development Management Plan.

This current application aims to overcome these reasons for refusal and find an acceptable solution.

Proposal

7. This planning application seeks permission for a two-storey extension to the existing school, to accommodate an increase in the School Roll from 1FE to 2FE. The extension would be located to the east of the original school (toward Zambra Way) and would be sited over the existing hard surfaced playground. The extension would be sited at a lower ground floor level than the existing school (as the playground currently is) and to accommodate this change in levels there would be a platform lift and stairs in the glazed linking area. The extension would have a roughly rectangular footprint, based around a central corridor with classrooms on either side. At both the ground floor level and first floor level there would be 3 classrooms on either side, thereby providing an additional 12 classrooms at the school. Year 1, 2 and 3 classrooms would be accommodated at ground level, and years 4, 5 and 6 on the first floor. The reception classrooms would be accommodated within the existing school building, as would the nursery facilities which are currently provided in a mobile classroom within the grounds. A second staircase would be provided at the eastern end of the extension, along with smaller Special Education Needs (SEN) rooms and a block of toilets would be provided at the western end of each floor.
8. The extension would be clad in western red cedar cladding in a vertical pattern, with extruded colour window reveals in yellow and green. The windows would be dark grey powder coated aluminium with ceramic coated glass panels in varying colours to match the reveals. The link between the existing and new buildings would also be created from these coated glass panels. The central corridor would have a flat roof over it and the classrooms on either side would be covered by a monopitch roof extending from the eaves to the centre in a zinc standing seam material. An area for the provision of solar panels is shown on the southern roof slope of the main extension.
9. The existing school would have three small extensions added to it and some internal alterations. There would be an extension at the front of the school to provide an enlarged head teachers office and a larger staff and admin room. Secondly a small addition would be added to the western elevation to provide new pupil toilets and a store room, and finally an extension to the southern elevation to provide a store room, lobby and first aid room adjacent to the school hall. Internally the school hall would be enlarged by extending into the existing year 1 classroom, and there would be various other minor changes to provide the correct size reception classrooms, pupil toilets and the nursery facilities. Timber decking with canopies over are provided outside the nursery room and both the reception classrooms. The colour of the existing school external walls would be changed from pale blue to white.

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10. Given the extension would be located over the existing playground, a new hardsurfaced playground would be created to the south of the extension, with a marked out, but unfenced, MUGA. The playing field for the school would be retained in its current location at the southern/south-western side of the site. The proposed new extension would provide all the accommodation required by the school and would therefore allow for all the existing mobile classrooms to be removed from the site. However, for the period of the building works, the temporary classroom located on the playground would be relocated to the south of the school (by the nursery building) and one additional temporary classroom would be required to accommodate the new entry of pupils in September 2018. This would be sited alongside the relocated one and would match it in size and colour.
11. The existing 'staff only' car park, which is located at the northern side of the site, would be extended to provide an additional 18 parking spaces which includes one designated disabled space (this would increase the number of spaces from 28 to 46). This application is accompanied by an associated application at the Seal Recreation Ground, where improvements are being proposed to resurface and increase the number of parking spaces in the car park, with a view to using it as a drop-off facility for parents taking their children to school. Five additional spaces would be provided, along with a turning circle to allow easy turning on site. Improvements to the footpath from here to the school via Zambra Way are also proposed, and this scheme is outlined in more detail in the following committee report (Item D2). Although the two applications are separate they will be considered together as the recreation ground proposals provide mitigation for the school proposal in highway and transportation terms.

Planning Policy

12. The most relevant Government Guidance and Development Plan Policies summarised below are pertinent to the consideration of this 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 provide 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

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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;
- that the planning system contributes to and enhances the natural and local environment and that when determining applications there should be an aim to conserve and enhance biodiversity;
- the great importance the Government attaches to Green Belts, with the fundamental aim of Green Belt Policy being to prevent urban sprawl by keeping land permanently open;

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.*

Draft Revised National Planning Policy Framework (March 2018)

A draft review of the NPPF was published on Monday 5th March 2018. The text has been revised to implement policy changes as a result of previous Government consultation on papers such as the Housing White Paper, National Planning Policy, Planning and Affordable Housing for Build to Rent, and Planning for the Right Homes in the Right Places. In so far as the review is applicable to the consideration of this planning application, the section relating to the delivery of school facilities remains largely unchanged with similarly worded text regarding the need to ensure sufficient choice of school places to meet the needs of existing and new communities.

The sustainable transport chapter emphasises that transport issues should be considered from the earliest stage so that potential impacts can be addressed and opportunities realised. It reiterates the current advice that the planning system should support sustainable development in preparing local plans and dealing with planning applications. It states that significant development should be focused on locations which can be made sustainable, limiting the need to travel and offering a genuine choice of transport modes, which would help to reduce congestions and emissions. The guidance for the consideration of development proposals has been separated under a new sub-heading but the guidance remains the same in that appropriate opportunities to promote sustainable transport modes have been taken up given the type of development and its location; that safe and suitable access to the site can be achieved for all users; and any significant impacts from development on the transport network (in terms of capacity or congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. Development, it states, should only be prevented or refused on highway grounds if the residual cumulative impacts on the road network or road safety would be severe.

The 'Protecting Green Belt Land' chapter remains practically the same, with only two amendments. The first relates to the drawing of green belt boundaries applicable for

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plan making, but more importantly for the purposes of dealing with planning applications would be the additional criteria listed in the types of development which are *not* considered inappropriate in the Green Belt. This states material changes in the use of land that would preserve the openness of the Green Belt and not conflict with the purposes of including land within it (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds, so long as the development would preserve openness).

- (ii) **Policy Statement – Planning for Schools Development (15 August 2011)** which sets out the Government’s commitment to support the development of state-funded schools and their delivery through the planning system. In particular the Policy states that the Government wants to enable new schools to open, good schools to expand and all schools to adapt and improve their facilities. This will allow for more provision and greater diversity of provision in the state funded school sector, to meet both demographic needs, provide increased choice and create higher standards.

- (ii) **Sevenoaks District Core Strategy (February 2011)**

Policy L08 The Countryside and Rural Economy: Seeks to maintain the extent of Green Belt, and conserve and enhance the countryside, including the distinctive features that contribute to the special character of its landscape and its biodiversity. The distinctive character of the Kent Downs Area of Outstanding Natural Beauty and its setting, will be conserved and enhanced.

Policy SP1 Design of New Development and Conservation: Requires all new development to be designed to a high standard, reflect the distinctive local character of an area, create safe, inclusive and attractive environments, incorporate sustainable development principles and maintain biodiversity. Account should be taken of guidance adopted by the District Council in the form of Conservation Area Appraisals and Parish Plans, amongst other matters. The Districts heritage assets and their settings, including listed buildings, conservation areas, historic buildings, archaeological remains, landscapes and outstanding views will be protected and enhanced.

Policy SP2 Sustainable Development: Sets standards for sustainable design and construction. Institutional development will be required to achieve a BREEAM rating of at least ‘very good’. In order to achieve this, the proposal will be expected to demonstrate 10% energy savings through renewable sources.

Policy SP10 Green Infrastructure, Open Space, Sport and Recreation Provision: Promotes the provision of multifunctional green space by linking existing green space areas. The Policy also seeks the retention of open space, sports and recreational facilities, including indoor facilities of value to the local community, unless any loss can be justified by additional provision of at least equivalent value to the local community.

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

Sevenoaks Allocations and Development Management Plan (February 2015)

Policy EN1 Design Principles: sets out the need for high quality design and for

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proposals to meet criteria including: responding to scale, height and materials; respecting the topography and character of the site and any sensitive features; not result in the loss of buildings or open space that would affect the character of an area, provided satisfactory means of access and parking provision; include opportunities for increasing biodiversity potential, including sustainable drainage and to avoid harm to existing biodiversity; create a permeable layout; safe and easy access for those with disabilities; creation of a safe and secure environment to deter crime and fear of crime; include modern communication technology and infrastructure; and make efficient use of land.

Policy EN2 Amenity Protection: Proposals should provide adequate residential amenities for existing and future occupiers of development, and safeguard amenities of existing and future occupiers of nearby properties by ensuring development does not result in excessive noise, vibration, odour, activity, vehicle movements, overlooking or visual intrusion and where it would not result in a loss of privacy or light.

Policy EN5 Landscape: Sets out that the Kent Downs and High Weald Areas of Outstanding Natural Beauty and their settings will be given the highest status of protection. Proposals that affect landscape throughout the District will need to conserve the character of the landscape including areas of tranquillity.

Policy GB8 Limited Extensions to Non Residential Buildings in the Green Belt: Proposals to extend an existing non-residential building within the Green Belt which would meet the following criteria would be permitted – (a) the existing building is lawful and permanent in nature and (b) the design and volume of the proposed extension, taking into consideration the cumulative impact of any previous extensions, would be proportional and subservient to the original building and would not materially harm the openness of the Green Belt through excessive scale, bulk or visual intrusion.

Policy T1 Mitigating Travel Impact: Sets out the need to mitigate against adverse travel impacts including their impact on congestion and safety, environmental impact such as noise, pollution and impact on amenity and health.

Policy T2 Vehicle Parking: Sets out that vehicle parking provision, including cycle parking, for non-residential developments should be in accordance with the advice of Kent County Council as Local Highway Authority.

Green Belt SPD

Sevenoaks Council's Supplementary Planning Guidance (SPD) provides detailed guidance on the implications of applying for planning permission for development located within the Green Belt. The document outlines that buildings must be permanent in nature and they will be considered on the basis of their volume, scale, bulk and whether or not the resultant building would adversely impact on the character of the countryside or openness of the Green Belt. The SPD outlines that the impact on the countryside is clearly greater if located in a highly visible location, however the test of the impact still applies even if there are limited or no public views of it. This is on the basis that, if allowed, the argument could be repeated, with a potentially more serious cumulative impact on the openness of the Green Belt and the urbanisation of the countryside and for these reasons would be unacceptable. The SPD concludes by

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saying that if the development is acceptable in principle, its form should be well proportioned and present a satisfactory composition with the building.

Consultations

13. **Sevenoaks District Council** object to the application on the grounds that the school is located within the Metropolitan Green Belt and the proposal would represent inappropriate development harmful to the maintenance, character and openness of the Green Belt contrary to the National Planning Policy Framework, Policy GB8 of Sevenoaks District Council's Allocation and Development Management Plan, and L08 of the Core Strategy. The very special circumstances provided do not clearly outweigh the harm to the Green Belt.

Seal Parish Council state that they support the improvements to the Primary School and the revised design. Their agreement with the County Council and the School for the walking bus from the Recreation Ground car park is a helpful step to ease congestion at the school, however, the Parish Council's view is that this alone will not cope with the traffic pressures at the school. The Parish Council therefore supports the concerns of the local community and objects to the expansion of Seal Primary School because of traffic congestion and inadequate parking, notably in the access to the school at Zambra Way and Ash Platt Road, but also throughout the village and on the roads leading to it.

Sevenoaks Town Council – no response received to date.

Highways and Transportation Officer raises no objection to the application subject to the imposition of conditions relating to the need for a robust School Travel Plan, a Construction Management Plan, the protection of parking spaces, and that best endeavours are used to extend the 30mph speed limit along the A25 where it is currently 40mph, and have Seal Primary School designated as a 'Safer School Zone'.

Sport England objects to the application because they consider it does not accord with any of the exceptions to Sport England's Playing Fields Policy or with Paragraph 74 of the NPPF.

Biodiversity Officer raises no objection subject to the imposition of conditions to cover the submission of a reptile/amphibian mitigation strategy; a bat emergence survey to be conducted; and the implementation of the ecological enhancements proposed.

County Archaeological Officer – raises no objection to the application provided a condition is placed on any consent to secure a watching brief so that excavation is observed and items of interest and finds are recorded.

Environment Agency (Kent Area) raise no objection to the application subject to the imposition of conditions to protect the Principal Aquifer which is a controlled water source and within Source Protection Zone 3.

School Transport Planner is content with the draft School Travel Plan.

Flood and Water Management Team raise no objection to the application subject to

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the imposition of conditions requiring a detailed sustainable surface water drainage scheme to be submitted and approved in writing by the County Planning Authority; and that the building shall not be occupied until an 'Operation and Maintenance Manual' for the proposed sustainable drainage scheme has been submitted and approved.

Local Member

14. The local County Member, Roger Gough was notified of the application on 11th May 2018. In response to the application he states: 'From my perspective as Cabinet Member for Children, Young People and Education, the expansion of capacity at Seal CEPS is required and this application is an essential part of it. The school has enjoyed a rising reputation and popularity in recent years, reflected in increasing applications for places, and the extra capacity provided relieves pressures in and around Sevenoaks Town, where just about all feasible school expansions have been undertaken. A great deal of effort has been made to accommodate justified local concerns, and this is seen in the new design and in the expanded car parking capacity in the recreation ground; this will meet the needs of those coming from the Town direction, which is likely to be the major source of additional pupils. It is reasonable to have concerns about ongoing pressures on the A25, but these are best addressed through measures linked to proposed expansion on the Trinity/ Weald of Kent site. As local Member, I will seek to support further Highways mitigation measures that address the concerns over the A25.'

Publicity

15. The application was publicised by the posting of four site notices, an advertisement in a local newspaper, and the individual notification of 122 residential properties. This included all those in close proximity to both the school site and the recreation ground site, alongside anyone else who previously made a representation to the 2016 application.

Representations

16. In response to the publicity, 30 letters of representation have been received, some supported by photographs of the issues described. The key points raised can be summarised as follows:
- Do not feel Seal Parish Council is working in the best interests of the Seal Village, the residents and children who attend the school – their best asset, the recreation ground, should be used for a positive purpose, namely the safety of children;
 - Concerns over health and safety for parents and children using Ash Platt Road due to volume of traffic and poor parking in the road;
 - With cars parked along Ash Platt Road it becomes a single width road resulting in cars driving over pavements to manoeuvre past each other;
 - Due to the bend in the road where Ash Platt Road joins Highlands Park, and the parked cars, visibility for those crossing the road is very poor;
 - Cars queue on A25 to turn into Ash Platt Road at peak times, exacerbated by parents using the end of Ash Platt Road to drop off children for Trinity and Weald of Kent Schools too;
 - Parking can cause roads to be gridlocked affecting the ability of a fire engine or ambulance being able to access properties in both Ash Platt Road and Zambra Way;

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- The entrance to the school from Ash Platt Road is not a 'pedestrian drop off' as virtually every pupil is driven here, often right up to the gate;
- The school gate in Ash Platt Road should be closed and used for emergencies only which would force parents to use the recreation ground drop off;
- The Recreation ground car park should be expanded alongside the A25 with in and out access, similar to the way the car park works in Ightham, with minimum impact on the park;
- Surrounding residential roads are not suitable for children cycling as they are so busy with cars at drop off and pick up times and the A25 is a very busy road;
- Issue of safety of children and parents raised during the previous application and doesn't appear to have been addressed;
- Proposed drop off point will have a minimal effect as it is too far away from the school and parents will use a closer option especially in bad weather, and as no shelter is proposed in the recreation ground;
- An additional 5 spaces at the recreation ground is unlikely to alleviate the current traffic situation, especially at pick up when parents park for longer to collect their children;
- Existing traffic and congestion on the A25 will discourage parents from using the recreation ground as it will be difficult to enter and exit quickly;
- The proposed drop off use here would also further worsen the existing traffic problems on the A25;
- Footpaths along the A25 are too narrow and dangerous to use, especially as they are also being used by children on scooters, and cyclists too scared to ride on the road;
- A walking bus should be created from Childsbridge Lane to stop parents driving into Zambra Way, or a drop off created within the school grounds;
- The School should provide a mini bus to collect children from further away;
- Land at the bottom of the recreation ground by the BT Exchange should be used for a car park at the school, with access from Childsbridge Lane;
- Insufficient additional staff parking being provided;
- Zambra Way has an overwhelming number of cars parked at drop off and pick up, meaning residents can't park if they arrive home at these times;
- Anti-social behaviour of parents who park across residents driveways and block them in and use residents driveways to relieve the congestion in the road; grass verges in Zambra Way are ruined in wet weather by parents parking on them;
- Increase in drop kerbs for properties in Zambra Way means there is less on street parking available;
- Letter from School to local residents highlights the problems experienced regarding the increase in traffic, lack of parking spaces, illegal parking and verbal abuse by parents to residents;
- The School have not succeeded in getting Parents to behave responsibly;
- Consider accidents are much more likely to happen due to the increased traffic as a result of the expansion, not 'unlikely' as suggested in the Transport Statement;
- Surrounding roads inadequate to support the current number of students at the school, let alone an expansion;
- Concerns about the effectiveness of the School Travel Plan;
- Additional pupils are unlikely to be coming from the village itself, therefore are likely to be driven to school where alternative modes of transport are not likely to be practical;

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- Zambra Way should have a 20mph speed limit to help the volume of traffic and speed of drivers;
- Insufficient staff parking would be provided for the number of staff proposed, meaning they too would park in the surrounding roads;
- The assertion that there will be no severe impacts because of the proposal is unbelievable as residents have witnessed the travel chaos over the last 2-3 years with the increase in pupils accommodated in mobile classrooms;
- Doubt the assumptions and conclusions of the Transport Statement. Parents cannot be made to use sustainable modes of transport, or the proposed drop off point;
- Meadowlands has suffered an increase in cars parking in it during this academic year, parking bumper to bumper, across driveways and right up to the junction with Childsbridge Lane making it difficult to access at drop off and pick up times;
- Increasing pupil numbers will exacerbate an already unacceptable situation and the time period over which this happens is becoming longer as parents arrive earlier to try and secure a parking space;
- Problems occur at lunchtimes as well as the morning and afternoon drop off and collection times;
- Unless alternative parking out of Zambra Way is provided the application should be refused;
- Noise pollution because of the expansion works, with heavy plant using Zambra Way.

Discussion

17. In considering this proposal regard must be had to the Development Plan Policies outlined in paragraph 12 above. Section 38(6) of the Planning and Compulsory Purchase Act (2004) states that applications must be determined in accordance with the Development Plan, unless material considerations indicate otherwise. Therefore the proposal needs to be considered in the context of the Development Plan Policies, Government Guidance and other material planning considerations arising from consultation and publicity.
18. This application is being reported for determination by the Planning Applications Committee due to the objections raised by the District Authority and Parish Council, the objection received from Sport England, and the neighbour representations received. In my opinion, the key material planning considerations in this particular case are the principle of development in this location in relation to the Green Belt and AONB, the siting and design of the proposed extension in terms of its built form; its siting which results in the loss of part of the playing field; the need for temporary classrooms during the construction period; the highway and traffic implications of the school expansion on the surrounding roads; and the subsequent amenity impacts of this for neighbouring residents. Other matters such as biodiversity, surface water drainage, sustainability and archaeology will also be covered in the report.

Principle of Development

19. The school site lies within the Green Belt and outside of the village boundary, where the District's Core Strategy Policy L08 seeks to resist inappropriate development, unless justified by exceptional circumstances. Policy GB8 of the Sevenoaks Allocations and Development Management Plan Document also addresses development in the Green

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Belt and sets out two criteria where development would be permitted. These relate to the need for the existing building to be lawful and permanent in nature, and that the design and volume of the extension (taking into account any previous extensions) would be proportional and subservient to the 'original'. The school building would meet the first criteria and the small extensions to the school would accord with the second, but the main two storey extension would add on a significant amount of floorspace (albeit only the minimum required for a 2FE school) and this element would not accord with criteria 2 of Policy GB8. As such the development is considered inappropriate development in the Green Belt when considered against Policy L08 and BG8 of the District's Planning Policy. Furthermore the development does not meet the exceptions outlined in paragraph 89 of the NPPF.

20. It therefore needs to be considered whether there are any Very Special Circumstances which exist, which would allow for the setting aside of the general policies of restraint in the Green Belt. The NPPF does not explain in any detail what "very special circumstances" means, but does say "very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations". The application is supported by a Planning Statement where the applicants have set out what they consider the Very Special Circumstances of the case to be.

Very Special Circumstances

21. The argument put forward by the applicants has a three-fold approach – the need for the development, the lack of alternatives and the minimum required. The need for the development centres on the educational need, backed up the Government's aims that there should be a sufficient choice of local school places to meet the needs of existing and new communities. The Educational Need has been outlined by the KCC Area Education Officer for North Kent. He states that there are a number of factors driving expansion within the Sevenoaks Catchment Area:
- Increased indigenous demand caused by changing demographics in the area.
 - Inward migration from within Kent, London, EU and non-EU areas causing both capacity pressures and budgetary pressures due to increasing numbers of EAL (English as an Additional Language) children.
 - Proposed medium scale housing development on several sites within the Sevenoaks District Catchment Area
 - Difficulties in utilising limited pockets of unused capacity that are confined to rural locations, while many urban areas experience significant deficits in provision. These limited pockets of unused capacity in rural locations will not provide sufficient capacity to accommodate projected demand for local primary school places in the Sevenoaks planning area.
 - Implications associated with utilising such pockets of unused rural capacity, such as a significant impact on home to school expenditure.
22. Forecasts for the Sevenoaks planning area (town centre, Riverhead, Dunton Green and Chipstead) indicates that there is barely sufficient capacity to accommodate existing and future demand for primary school places, creating no scope for parental preference. The Education Authority has recorded a rising number of families applying for primary school places within the Sevenoaks Planning Area, with the number of first

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preferences exceeding the number of places available at existing facilities. In the Sevenoaks Town planning area, for example, there were 377 1st preference applications, but only 360 spaces available, leaving a shortfall of 17 spaces for their first choice school.

23. In terms of the Kent Commissioning Plan (KCP), the expansion of Seal Primary School from an education point of view, was considered in 2015 and increased cohorts have been admitted since this time. Where the KCP states that there is sufficient capacity in the area, this is only due to the fact that 30 additional places are already commissioned at Seal, and these are already included in the latest projections. Should the school have to revert back to a roll of 30 children per year (1FE) it would, he states, result in children having to travel greater distances to get to the school they have been allocated putting additional pressure on traffic flow around this area of the district.
24. The applicants acknowledge that it would be preferable to locate new development outside of the Green Belt from a planning policy stance, but as the whole site at Seal falls within the Green Belt this could only be achieved by relocating elsewhere within the District. A number of other schools were considered for expansion alongside Seal Primary (within close proximity to, or within areas of, current or forecasted demand) and these included Lady Boswells PS, St Thomas Catholic PS, St John's CE PS, Sevenoaks PS, Riverhead Infants PS, Kemsing PS, Dunton Green PS, Otford PS and Chevening St Botolph's CE PS. Of these some were considered to be on sites that were too small or were constrained and therefore had insufficient space for additional buildings, some had already been expanded by a form of entry, and others were constrained by site topography, or were simply not in the area of highest demand. Moreover some of these other schools are also within the Green Belt - 93% of the Sevenoaks District is located within its confines. In terms of looking for any alternatives, it was considered that Seal was the only logical solution and as set out above has been taking an additional form of entry since 2015, so is three years into the expansion to 2FE.
25. The third string of the argument put forward is the 'minimum required'. The current school is undersized in relation to the Building Bulletin for Schools BB103, with existing classrooms measuring approximately 37m² instead of the minimum of 55m². Furthermore, many classes are located in temporary mobile classrooms on site. The applicants state that the design chosen would provide the minimum amount of floorspace required for a 2FE school according to BB103.
26. The District Council have raised an objection to the application on the grounds that it would represent inappropriate development harmful to the maintenance, character and openness of the Green Belt and that in their view the Very Special Circumstances do not clearly outweigh the harm to the Green Belt. In addition to the Very Special Circumstances above, the applicants have considered whether the development would impact on the openness of the Green Belt, in particular given the previous reason for refusal of the last scheme on these grounds. The applicants have suggested that openness can be assessed in two ways – the visual openness of the site relating to how visible the building is, and the physical openness relating to the amount of development.
27. In terms of visual openness they suggest that there are limited views into and across the site owing to its woodland boundary and topographical level differences, plus the presence of residential development to both the east and west of the school site, and

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these factors would ensure that the openness of this site in relation to the wider green belt designation would not significantly change. The previous scheme proposed a single storey extension with a larger footprint which spread development across a larger area of the site, whereas this scheme is for a two storey extension with a more compact footprint. Views of the extension would be seen against the backdrop of the existing school buildings and the extension would be set into the ground at a lower level than the existing school which would help minimise its visual impact. Furthermore the openness of the school site would be improved through the removal of all the temporary classrooms from the site reducing the spread of development.

28. In terms of the physical amount of the site that would be covered with buildings, hard play, roads and paths in relation to the green space and wooded areas on site, the existing figures show 77% would remain undeveloped from these physical structures and hard surfaces, whereas with the proposed extension 73% would remain undeveloped (compared to the previously refused scheme where 68% remained undeveloped). Just over 70% of the site would therefore remain 'open' should the extension be approved, which is still a substantial amount which would maintain the overall openness of the site, and more than the previous scheme.
29. In considering the justification given in relation to the openness of the Green Belt and whether the proposed extension would affect this, it should be noted that openness of the Green Belt is described as an 'absence of development' irrespective of the degree of visibility of the land in question from public vantage points. Therefore, any physical development within the Green Belt, whether visible or not, would have some impact on the openness. Whether that impact is either acceptable or unacceptable is a matter of fact or degree based on the specifics of each case. I consider that the proposed extension would be seen within the context of an established education facility, sited in close proximity to the existing building and neighbouring development in Zambra Way, thus keeping the built form within one established area, and ensuring that it would not encroach into the more open part of the site. Only 8% of the site area would have built form on it and the established landscaping around the perimeter of the site would screen the development from wider views. On this point I consider the proposed development would not affect the function of the Green Belt.
30. Overall, and taking on board the views of the District Council, I accept the applicant's assessment and application of Green Belt Policy as set out in the submitted documentation, and I have considered this in the context of the Development Plan Policies and the NPPF. The development is inappropriate development for the purposes of Green Belt Policy consideration and is, therefore, by definition harmful to the Green Belt. Nevertheless, in my view, the considerations summarised above are sufficient collectively to constitute 'Very Special Circumstances' capable of outweighing harm, in this particular case. I accept that the carefully designed extension and its siting in relation to the existing school and surrounding built development would mitigate the impact of the development on the functioning and openness of the Green Belt. Accordingly, I consider that an objection on Green Belt grounds would not be warranted in this particular case. However, if Members were minded to grant permission, the application would need to be referred to the Secretary of State for Housing, Communities and Local Government before permission could be granted, to enable him to adjudicate on the Green Belt ramifications of the proposed development.

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Siting and Design of the Extension

31. The proposed extension would be sited to the east of the original school and would extend towards Zambra Way. A glazed link would connect what would be the two sections of the school and the new element would be at a slightly lower level than the original building due to the levels difference across the site. The extension would be of a modern design with two small monopitch roof elements either side of the flat roof over the corridor, and whilst this would be different to the existing school, the original school has little architectural merit and in this case would not warrant replicating. The design includes protruded windows which would add detail to the timber clad elevations, as would the coloured glass panels. The roof would be constructed from standing seam zinc.
32. It is considered that the materials would complement the natural wooded appearance of the school site, and it is proposed to change the elevations of the existing school to white so that the two elements are more complimentary. The change in levels in the area of the proposed extension (floor level is 1.6m lower than the existing) would ensure that even though a two-storey extension is now proposed the scale of the extension would not be overbearing to the original building.
33. The proposed extension would project towards the shared eastern boundary with the properties in Zambra Way, whose rear gardens back onto the school. There is an existing close board fence along this boundary and some established planting. The distance between the rear elevation of the properties in Zambra Way and the new façade of the extension would be 28m at the closest point, which exceeds the widely accepted industry guideline of 21m as a separation distance between neighbouring properties, included in design guides across the Country. In particular this distance is judged to be a target separation distance between the facing windows of 'habitable rooms' in adjacent properties, beyond which privacy by virtue of overlooking is deemed to be of insignificant nuisance. Given this distance, the intervening boundary treatment and the fact the windows in this new end elevation would be obscure glazed at first floor level, it is considered that the extension would be at a sufficient distance away from the neighbouring houses, so as not to cause an overlooking issue or be overbearing in terms of scale and height.
34. The hard surfaced playground would be provided to the south of the proposed extension, and would include an unfenced but marked out MUGA (which is not proposed to be lit). The playing field would then lie to the west between the playground and the existing school. To the north of the school and proposed extension, the staff parking area would be remodelled to accommodate some additional parking spaces. The parking provision and implications of the changes to the layout in terms of playing field provision are addressed further below.
35. The proposed extension would be seen in the context of the existing school buildings and the wider residential development of Zambra Way, and the modern design is therefore considered to be appropriate for the site. The choice of materials proposed would complement the wooded and landscaped nature of the site and would be acceptable in principle. The overall layout on site would work well in terms of integrating with the existing school. It is therefore considered that from a design and siting point of view, the application would be acceptable, and in accordance with SP1 of

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the Core Strategy and policies EN1 and EN2 of the Allocations and Development Management Plan.

Siting of the Extension Resulting in the Loss of Playing Field

36. The proposed new extension would require the layout of the school to be altered in terms of the open space and sports provision on site. The extension would be built on the area of the existing playground, and this would therefore be relocated to the south of the new extension, along the eastern boundary. Due to development being proposed on an existing area of playing field, Sport England were consulted, and have raised an objection to the proposals as they considered it would not accord with any of the exceptions to Sport England's Playing Fields policy, or with paragraph 74 of the NPPF. They state that whilst they welcome the removal of the temporary classrooms from the playing field, the new hardstanding proposed raises other issues for them. They do not consider the proposed MUGA as being a true MUGA because it is not fenced and because it does not appear to have a suitable surface such as polymeric or porous tarmac. In their view, this facility would not compensate for the loss of playing field.
37. Sport England did suggest that in order to overcome their concerns the MUGA should be upgraded and fenced in order to meet exception E5, or that the hardstanding be moved to the western side of the school, to the north of the footpath. This area is separate from the rest of the playing field and incapable of being used for formal sports provision on its own, therefore Sport England would not object to it being provided as hard standing.
38. Contained within the Planning Statement, the applicants have considered the implications of the new playground in relation to the Sport England Policy and the five exceptions. They state that the existing area of playing field in the south-eastern corner (where the trim trail and climbing frame are located) is prone to waterlogging and the relocation of this to an alternative location and the siting of the playground in this area instead would make this area useable all year round. The replacement playground would be of a higher quality than the existing one and include marked out courts for external sports facilities. The school have opted not to fence the sports courts in, to enable them to more flexibly utilise the hard-surfaced space for informal play as well as PE sessions. The internal alterations and enlargement of the hall, as a result of the new extension, would improve the schools internal sports provision and the planned removal of all the temporary structures on site would also benefit the overall sports and play provision on site. Finally they note that the proposals would meet BB103 in terms of the space requirements for hard play space.
39. The suggested alternative location for the playground, proposed by Sport England, would not be feasible due to the topography of the site, and furthermore it would not relate as well to the classrooms as the current layout. The proposals do result in the small loss of an area of undeveloped open space on the site currently used for informal play provision, and therefore in strict policy wording terms, it would not accord with Sport England's policy aimed at protecting playing field and open space provision. It should however be noted that the layout of the playing pitch itself would not be affected by this proposal, as this would remain unchanged in the south-western corner of the site. The removal of the temporary classrooms would result in this space becoming available for use, and the provision of the improved playground facilities incorporating marked MUGA pitches would be of benefit to the School, as would the enlargement of

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the school hall to improve indoor facilities, the retention on site of the relocated play equipment and the school's 'Forest School'.

40. Clearly the extension cannot be accommodated on site without there being some net loss of open space, and it is accepted that the proposals do not precisely comply with the exception policies of Sport England's guidance or the bullet points of paragraph 74 of the NPPF. In my opinion, although there is an objection by Sport England, I consider that the provision of additional primary school places to meet the needs of the local community, combined with the provision of improved sports facilities associated with this, would outweigh the loss of part of the existing informal play space, especially when taking a longer term view and considering the proposals in a holistic and broader context. However, if Members are minded to permit the proposals, the application would need to be referred to the Secretary of State for his consideration of the playing field implications as well.

Need for Temporary Classrooms

41. There are currently 3 double temporary classroom buildings on site (6 classrooms in total), two of which are covered by temporary planning permission (reference SE/17/2395, which gave a 3 year consent running until November 2020) and one which was placed on site last summer (2017) under permitted development rights. In addition there is a further smaller building used for the nursery. The temporary classrooms are required to accommodate the number of children on site, which has increased beyond the capacity of the existing school due to the expansion from 1FE to 2FE that is already underway. The proposed scheme would provide enough accommodation for a full 2FE school roll and would therefore allow for all the temporary classrooms on site to be removed. However, should permission be given there would still be a shortfall of accommodation on site for the intake this September (2018), and therefore this application also seeks permission for a further single storey classroom to be sited to the south of the nursery building until the new extension can be occupied. The double classroom currently sited on the playground would need to be relocated to allow construction of the extension and is proposed to be sited next to the new classroom south of the nursery.
42. Whilst the provision of temporary classrooms is never considered ideal, the process of finding a permanent solution has been delayed by the previous refusal and subsequent negotiations, and therefore as an interim measure has been found to be necessary. The new temporary building would, as for the main extension, be considered as inappropriate development in the Green Belt, would therefore by definition be harmful to the Green Belt, and again only considered acceptable in Very Special Circumstances. The temporary buildings that are currently on site have already been assessed for their impact on the Green Belt and found to be acceptable. The only impact to assess here is for the new single mobile classroom. As for the previous temporary permissions it should be noted that the site is secluded and well screened by existing mature tree and hedge planting. The new temporary building would be sited alongside the others on site and seen within the context of the main school building and as such it is considered that it would not unduly impact on the functioning of the Green Belt and the protection of its openness. Furthermore the strong boundary treatment to the south and the grouping of the buildings together would ensure the character and appearance of the adjacent AONB would be protected.

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43. Given the fact that all the temporary buildings, including this new one, would be removed from site should the permanent extension be approved, it is considered that any perceived impact on the Green Belt would only be temporary. In terms of the design of the unit, it would be of a similar style to the existing units on site and would therefore be in keeping with the character of development at the school. In my view the siting of the units would represent the option which strikes the best balance between minimising physical intrusion into the Green Belt and providing sufficient accommodation and facilities to enable the school to deliver its educational requirements. Accordingly I consider that an objection on Green Belt grounds would not be warranted in this case.
44. Although the Parish Council have requested that the temporary buildings are all removed from site prior to the occupation of the new extension (if approval is given), this would not be feasible as the children will need to be accommodated in the new extension before the temporary buildings are no longer required. It is therefore suggested that the temporary buildings should be removed from site within 3 months of the occupation of the new school building.

Highway and Traffic Implications of the School Expansion

45. The school is located at the end of a residential cul-de-sac, which provides the sole vehicular access to the site, leading to on-site parking for staff only. A secondary pedestrian access into the school is provided from Ash Platt Road. The proposals include an increase in on-site parking from 28 spaces to 46, including one dedicated disabled space. The on-site parking would remain for staff only, which means all parents and visitor parking must be accommodated on the surrounding road network. In order to mitigate for this, and address the previous reason for refusal, the accompanying application at Seal Recreation Ground proposes that this be used for a walking bus drop off/pick up facility. The majority of the representations received relate to the current problems experienced at school drop off and pick up times with parking in Zambra Way, Ash Platt Road and Highlands Park.
46. The application was supported by the submission of a Transport Statement (TS) together with a School Travel Plan (STP) both of which were produced by DHA Transport (April 2018). In the opinion of the Highways Officer, this revised TS (compared to that submitted in 2016 for the earlier application) provided much more robust evidence than previously on the likely highway impact of the increase in the number of pupils and staff and offered mitigating measures to minimise any disruption and congestion caused. As a result of this robust evidence, a meeting was held between the Transport Consultants and the County Highway Officer to discuss highway matters and this resulted in additional information and evidence being provided in a Transport Statement Addendum (TSA) dated 25th June 2018, and the views of the Highways Officer are based on both the original TS and the TSA.
47. Currently the School has 273 pupils and 41 staff, 28 of which are Full Time and 13 Part Time. The school car park is available for staff only and has 28 spaces which, from surveys undertaken, appears to be adequate for those numbers. There are 20 cycle spaces together with parking for scooters, and the school operates a phased start time/end time arrangement which helps to spread the times at which parents drop off and collect their children. A large proportion of current pupils (50%) live within 2km of school i.e. suitable for walking, but only 28% of pupils walk to school. In addition the

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majority of staff travel by car (90%) and few currently car share. It can therefore be seen that whilst there is an existing School Travel Plan (May 2016), this needs to be made more robust, even for current pupil numbers, to improve the sustainable modes of transport to and from school. In order to assess the existing parking in the area, parking stress surveys were carried out in Zambra Way, Highlands Park, Ash Platt Road and the Recreation Ground Car Park in June 2017, and these indicated that up to 75% of spaces were occupied by parked vehicles in the morning and up to 89% in the afternoons. This figure included residents cars and other visitors to the recreation ground. The parking assessment showed that a minimum of 31 spaces were available in the morning and 16 in the afternoon, but also it was observed that better parking management was needed to prevent accesses being blocked and parking on junctions.

48. The TS and TSA have calculated the existing and likely trips generated as a result of the 1FE expansion. In terms of staff cars the increase would be from 36 to 48 (taking account of part time staff) and the Highways Officer confirms that the increase in the staff car park from 28 spaces to 46 would meet the KCC Parking Standards and would therefore be acceptable, in accordance with Policy T2 of the ADMP. The Trip forecast for the school before and after expansion has been considered by the Highways Officer. The figures provided break down existing trips in the morning and afternoon peaks which are then adjusted for sibling combined travel; and staff trips which are then adjusted to take account of part time staff. The same exercise is undertaken for proposed trips after the full expansion, taking into account expected Travel Plan reductions and pre/after school clubs. The total car movements (parent + staff trips) are as follows:

<u>Existing</u>	<u>Proposed</u>
Total car movements am peak: 261	Total car movements am peak: 295
Total car movements pm peak: 247	Total car movements pm peak: 277

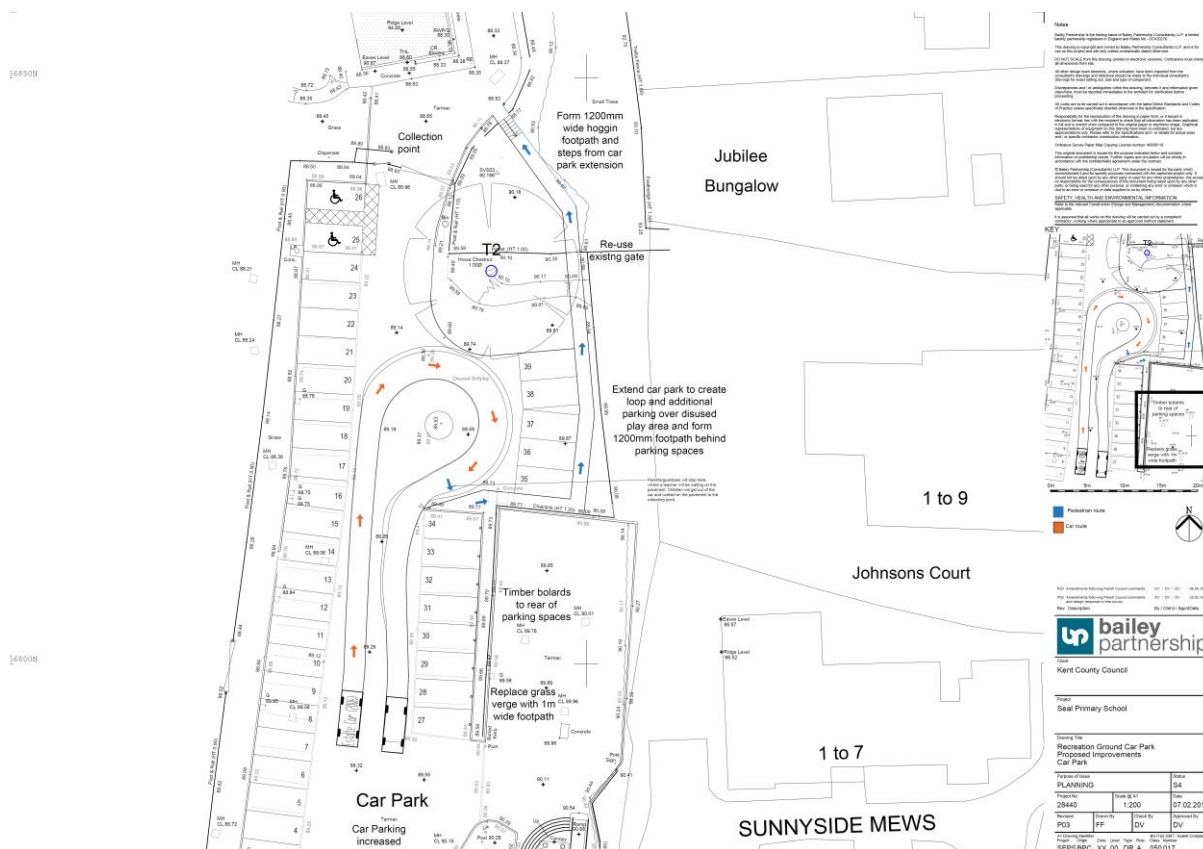
Therefore, the expected peak time increase in car movements are as follows:

am peak	$295 - 261 = 34$ additional movements
pm peak	$277 - 247 = 30$ additional movements

In order to address this increase a combination of additional parking at the Recreation Ground Car Park (5 additional spaces), a managed drop off zone within this Car Park and a more robust School Travel Plan are proposed to reduce the impact of additional vehicles accessing the School. The TS and TSA have assessed that as a result of these mitigation measures the number of cars would be reduced to 34 additional trips in the morning peak and 30 additional trips in the afternoon peak. These figures also take into account a reduction due to siblings using the same car.

49. The Highway Officer considers that the stress on parking availability will be reduced by the introduction of the drop off facility at the Recreation Ground car park. The School have confirmed that in order for this facility to be effective and run smoothly, four members of staff would be available at school start and finish times to accompany pupils to and from school so that the system works safely. To this end the applicants have submitted an updated plan which shows where pedestrian and vehicle movements would be undertaken (shown overleaf), and the Highways Officer is now assured that this would work safely in practice.

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50. Key to managing the increased number of cars dropping off and picking up pupils is the School Travel Plan (STP). A STP has been submitted in support of the application with the School indicating its commitment to encouraging more pupils and staff to travel to and from school in a more sustainable way. The existing Travel Plan needs to be more robust so that pupil number increases do not create problems, and the Highway Officer considers that there is plenty of scope for increasing the current percentage of pupils walking or cycling to school, stating that 28% is a low and disappointing number for essentially a village school. The School Travel Plan target is for the number of pupils travelling by car to reduce from 63% to 51% within 5 years (when the expanded school would be at full capacity) and it is considered that this should be achievable given the number of pupils living within walking/cycling distance of the school, and the encouraging measures proposed by the School itself. Car sharing should also be further encouraged and the School Travel Plan Co-ordinators could organise a car-sharing database to assist in making this effective. Furthermore the increase in pupil numbers is likely to mean an increase of siblings attending the school which the Highways Officer states should help reduce the number of vehicle trips with single pupil occupants.
51. In addition to the School Travel Plan, the TSA confirms that the Parish Council have offered their support for putting Seal Primary School forward as a ‘safer school zone’. This is an important proposal, the details of which are explained below:

“Under these arrangements, schools with school keep clear areas, school crossing patrols and yellow lines that suffer from illegal parking at drop off/pick up times are

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designated as “Safer School Zones” where no stopping and/or parking is allowed. This is intended to deter drivers who cause danger and obstruction by stopping on restrictions close by schools, when safer more appropriate parking is available nearby. Highly visible “Safer School Zone” signs are put up at the approaches to the Zone. Civil Enforcement Officers (often referred to as traffic wardens) patrol and issue immediate parking tickets to vehicles stopped on restrictions within the Zone.”

Should the Parish be successful in obtaining this status for Seal Primary School, it should help improve the anti-social behaviour of some parents who continue to park on the keep clear school markings in Zambra Way.

52. Another issue highlighted as a problem deterring parents and children from walking to school is the width of the footway alongside the A25 between the recreation ground and Seal Hollow Road where the speed limit remains at 40mph. It is suggested that the School should lobby for the reduction in the speed limit along the length of this road to 30mph, between the two sections of existing 30mph limits, which would improve pedestrian safety and encourage walking to school. This, the Highway Officer states, could be combined with the introduction of a pedestrian phase at the Seal Hollow Road traffic lights. The 30mph speed limit and traffic light phasing cannot, however, be secured as a condition on this planning permission, as it would be subject to a Traffic Regulation Order with its own consultation process. It is therefore proposed that an Informative could be included stressing the importance of the School pursuing these matters and the ‘Safer School Zone’, in the interests of the safety of their pupils and to encourage more sustainable modes of transport.
53. Whilst the Highway Authority have some concerns over the additional local congestion and parking issues that this development would create, in terms of Policy, the NPPF paragraph 32 states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are ‘severe’. That, the Highway Officer states, can only be judged on a case by case basis, taking account of all material factors. The TS and TSA have been considered along with the current and likely future conditions on the local highway network. Whilst the submitted information shows that the situation is likely to be worsened, given the mitigating measures proposed (additional parking, drop off zone and a robust School Travel Plan) he is not able to conclude that it would result in conditions that could be described as ‘a severe impact on congestion or safety’, particularly when such impacts occur for short periods during the morning and afternoon and only during school term time. The Highway Authority conclude that with appropriate conditions and a pro-active input from the School to improve sustainable travel to and from school by pupils and staff, that the impact may be reduced considerably. The careful production, monitoring and review of the School Travel Plan would be the key to this. In addition to the School Travel Plan other conditions suggested, should the application be approved, would be for the permanent retention of the staff parking areas shown, and the need for a Construction Management Plan (this is addressed further below). Furthermore, a condition requiring the recreation ground car park to be available for use upon completion of the new classroom block should also be included as this provides part of the mitigation for the expansion and ought to be in place in conjunction with the new facilities.
54. Considering the off-site highway aspects of the proposed development as a whole, it is to be borne in mind that primary schools generate a level of localised traffic congestion and competition for on-street parking space. In most cases this is a short lived

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nuisance and irritation rather than a serious risk to road safety. Moreover, it only occurs on days when the school is open, compared to streets that are close to shops, offices, railway stations etc. Nevertheless, it is acknowledged that these cause friction between residents and school parents over on-street parking, but the public highway is there to be used and it is not the sole preserve of any one category of highway user. The key to minimising traffic nuisance and avoiding safety risks is sound management of the available facilities and the measures proposed seek to do this. It is therefore considered that the scheme meets the aims of Policy T1 of the ADMP, in that it seeks to mitigate against adverse travel impacts as a result of the school expansion.

Other Matters**Construction**

55. A condition requiring the submission of a full Construction Management Plan (CMP) for written approval, prior to commencement of development is considered appropriate and has been requested by the Highways and Transportation Officer. He states that construction works would need to be carefully planned and managed to ensure the safety of pupils, staff and residents. The CMP should include amongst other matters that no traffic movements, including deliveries, should occur in Zambra Way and Ash Platt Road during school start and finish times; the location of parking and turning areas for construction and delivery vehicles and for site personnel and visitors; and the provision of wheel washing facilities. Given that there are neighbouring residential properties to the site, if planning permission is granted it is considered appropriate to restrict the hours of construction to protect residential amenity (Monday to Friday between 0800 and 1800; Saturday 0900 to 1300; and no operations on Sundays or public holidays). This could also be included in the CMP.

Ecology

56. The application was supported by the submission of a Preliminary Ecological Appraisal (April 2018) which considered the suitability of the site to support various protected species, including reptiles, amphibians, and bats and this documentation was assessed by the County's Biodiversity Officer. Most of the proposed development is located on hardstanding or amenity grassland, but the proposed car parking area would result in the loss of a small area of grass bank and trees. The survey states that there is a low potential for bats to be roosting in the main school building; that there is limited potential for reptiles and amphibians to be present within the woodland and grass bank to the north of the site; and that there are suitable features for breeding birds within the site.
57. Due to the small area of grassy bank/trees to be lost it is considered that there would not be a requirement for a reptile or amphibian survey to be carried out and instead the Biodiversity Officer considers that the risk to individuals can be avoided through the implementation of a detailed mitigation strategy. A suitably worded condition is suggested to ensure that the strategy is submitted and agreed prior to the commencement of the permanent development, and then implemented as approved. The proposed development would not directly affect the main school building therefore if bats are roosting within the building it would not result in a loss of a roost, however because of the proximity of the new extension to the main school, the works or lighting might affect them accessing their roost. It is therefore considered that the bat emergence surveys suggested in the report would be required, but because of the low

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potential they could be secured (and any mitigation required) by a suitably worded condition if planning permission is given. Finally the application provides opportunities for ecological enhancements to be incorporated on site and the report makes a number of recommendations which the Biodiversity Officer considers should be implemented of approved, and once again, these can be secured by condition. It is therefore considered that the scheme would comply with paragraphs 109 and 118 of the NPPF, Policy SP11 of the Core Strategy and EN1 of the ADMP.

Landscape

58. The application was supported by the submission of an Arboricultural Impact Assessment (March 2018), which outlined the trees that would need to be removed from the site to accommodate the proposed development. Most of trees to be removed are contained within the site and their removal would have no impact on views into the site from wider vantage points. The tree belt along the eastern boundary would be retained and protected during construction, as would the trees along the southern boundary. The most noticeable change would be the removal of the group of trees by the main school entrance which would be removed to allow the car park to be extended. However, it is considered that even this loss would be seen within the context of the remainder of the tree belt along the northern boundary and would have a limited impact overall in landscape terms. The proposed development is unlikely to have an impact on the landscape character of the AONB given the above, and subject to the imposition of a landscape condition requiring some replacement tree planting to be undertaken on site, it is considered that the proposed development would be acceptable in landscape terms, in accordance with Policy L08 and SP1 of the core Strategy and Policy ENV5 of the ADMP.

Flood Risk & Drainage

59. The application was supported by the submission of a Flood Risk Assessment which shows that the proposed extension falls within Flood Zone 1, the zone least vulnerable to flooding, and that the playground and MUGA are partially within Flood Zone 2, an area of medium risk of flooding. Because the playground and MUGA are considered as having low vulnerability in flood risk terms it is considered that their provision is acceptable in Flood Zone 2, whilst the proposed extension meets the aims of the sequential test by providing the development within an area with the lowest probability of flooding. In flood risk terms the proposal is therefore considered acceptable.
60. Details of the proposed drainage were also included in the report and the County's Flood and Water Management Team have assessed these details. They state that they have no objection to the proposed drainage into a soakaway as there are existing soakaways at the site, however additional site specific ground investigations would be required to support the use of infiltration as recommended in the report. Therefore, should permission be granted they have requested the imposition of conditions to secure the submission of a detailed sustainable surface water drainage scheme to be agreed in writing prior to development commencing and that the extension shall not be occupied until an operation and maintenance manual has been approved in writing.

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Ground Contamination

61. The Environment Agency were consulted on the application as the site is within Source Protection Zone 3 and located upon a Principal aquifer, therefore controlled waters are particularly sensitive. The application was supported by the submission of a Ground Investigation (March 2016) and a Phase 1 Desk Top Study Report (July 2015). The Environment Agency state that they have no objection to the proposed development, as the Ground Investigation Report provides them with confidence that the risk posed to controlled waters can be suitably managed, but that further detailed information is still required. This information, they suggest, can be sought through the imposition of conditions if the application were to be approved, and these relate to the need for a remediation strategy to deal with risks associated with contamination of the site being submitted to and approved in writing by the County Planning Authority before development commences; a means of dealing with any contamination being found on site that hadn't been previously identified; that no piling or penetrative foundation methods be used on site without prior written consent of the County Planning Authority; and that a drainage strategy be approved for the site prior to development commencing.

Sustainability

62. The design of the proposed extension has been undertaken to include various sustainable measures so that the scheme would accord with the principle of BREEAM Very Good. These would include passive design elements such as natural ventilation, good levels of natural daylight to the classrooms to avoid the need for artificial lighting, energy efficient internal lighting with occupancy sensors to minimise energy consumption, and dusk to dawn sensors and timers for external lighting. External renewable energy sources have also been considered for the proposed development and as a result an area for photovoltaic panels has been identified on the southern roof slope of the main extension. Although the County's education developments are not officially taken through the BREEAM process, it is considered that this scheme would accord with the aims of Policy SP2 of the Core Strategy, where institutional development is required to meet the 'very good' rating.

Noise Assessment

63. A Noise Assessment has been submitted in support of the planning application, which assessed the proposed development against British Standard 4142:2014: *Method for Rating Industrial Noise Affecting Mixed Residential and Industrial Areas*. This was considered to be the most relevant piece of guidance for a situation where a new noise source might be introduced in a mixed residential area. Because at this stage specific equipment and final location for any plant has not been confirmed, the report considered a worst case scenario of all new plant equipment being in one location adjacent to the closest neighbouring property, which would be 28m away in Zambra Way. The report concluded that the plant equipment (which would only be used during school hours of operation) would have a low impact on residential amenity.

Archaeology

64. The County's Archaeological Officer has considered the application and notes that the site has the potential for Palaeolithic remains and sits on River Terrace Gravels. As such any excavations ought to be observed to ensure any items of interest are

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observed and recorded. A suitably worded condition to secure the implementation of a watching brief would therefore need to be included, should permission be given. As such the scheme would comply with Policy SP1 of the Core Strategy.

Conclusion

65. In my view the key determining factors for this proposal are the principle of allowing the development given its location in the Green Belt, the loss of playing field land, together with the appropriateness of the extension in terms of design and layout and the suitability of the highway network to accommodate the additional school traffic in this location. There is strong Government support in the NPPF for the development of new schools to ensure that there is sufficient provision to meet growing demand, increased choice and raised educational standards, subject to being satisfied on local amenity and all other material considerations, such as 'very special circumstances' allowing development in the Green Belt, highway matters, design, ecology, and landscape. In my view the proposed development would not give rise to any severe, significant or demonstrable harm in any of these respects, that would be overriding as far as planning, environmental and amenity aspects are concerned, as demonstrated in the discussion above.
66. The objections received in relation to the loss of playing field land and the fact the development would be sited within the Green Belt have been considered in detail above. In my view the proposed extension would not affect the principle aim of protecting the Green Belt and the small loss of playing field land would be compensated for by the provision of better on site sports facilities. The highway and transportation impacts would in part be mitigated by the provision of the extended car park facility at the recreation ground car park which would provide a parent facility for school drop off and pick up times, in association with a walking bus run by the school, which provides a much improved solution compared to the previously refused scheme.
67. In my view the development is sustainable, in accordance with the aims of the NPPF and the Development Plan policies, and there are no material planning considerations that indicate that the conclusion should be made otherwise. In addition, support for the provision of school places is heavily embedded within the NPPF, the Planning for Schools Development Policy Statement, and local planning policy, and this development would satisfy a required need for primary school places in the Sevenoaks area. I therefore recommend that the application be referred to the Secretary of State for Housing, Communities and Local Government for his consideration, and subject to his decision that various conditions be placed on any planning permission, including those outlined below.

Recommendation

68. I RECOMMEND that the application BE REFERRED to the Secretary of State for Housing, Communities and Local Government, and SUBJECT TO his decision, PERMISSION BE GRANTED, SUBJECT TO the imposition of conditions covering (amongst other matters) the following:
- the standard 3 year time limit;
 - the development to be carried out in accordance with the permitted details;

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- the submission and approval of details of all construction materials to be used externally;
- the first floor windows on the eastern end elevation shall be obscure glazed as shown on drawing number XXZZDRA050007 Rev P01 and retained as such to avoid overlooking of neighbouring properties;
- details of the roof plant shall be submitted to and approved in writing prior to the commencement of the permanent development;
- within 3 months of occupation of the school extension all temporary classrooms shall be permanently removed from the site and the land reinstated as part of the playing field/informal play space;
- within 6 months of occupation of the extension, the submission and written approval of a revised and updated School Travel Plan, and thereafter its ongoing monitoring review for a period of 5 years;
- the off-site parking facility shall be provided for parent drop off and pick up facilities prior to 1st September 2019, or upon completion and occupation of the extension, whichever is the latter, to mitigate for the expansion of Seal Primary School from 1FE to 2FE;
- the submission of a Construction Management Plan, providing details of amongst other matters that no traffic movements, including deliveries, should occur in Zambra Way and Ash Platt Road during school start and finish times; the location of parking and turning areas for construction and delivery vehicles and for site personnel and visitors; the provision of wheel washing facilities; and hours of construction;
- that the ecological enhancements recommended in the Ecological Appraisal be implemented;
- that a detailed reptile and amphibian mitigation strategy be submitted prior to commencement of development;
- that a bat emergence survey and any details of mitigation be submitted prior to commencement of development;
- the provision and permanent retention of the vehicle and cycle parking facilities prior to the occupation of the school and their retention thereafter;
- the submission of a fully detailed sustainable surface water drainage scheme for the site prior to commencement of the permanent development, and the written approval of such a scheme and its on-going maintenance prior to occupation of the extension;
- the submission and approval of a maintenance manual for the sustainable drainage scheme prior to occupation of the extension;
- no development of the permanent extension shall commence until a remediation strategy to deal with risks associated with contamination of the site has been submitted to the County Planning Authority and approved in writing;
- if during development contamination not previously identified is found to be present, then no further development shall take place until a remediation strategy has been agreed with the County Planning Authority;
- no piling or penetrative foundation methods be used on site without prior written consent of the County Planning Authority;
- the submission of a native species landscape scheme and details of a maintenance scheme for such landscaping to ensure the establishment of the planting and that it be managed to benefit biodiversity;
- prior to commencement of the permanent development all trees and hedges in close proximity to the proposed development that are to be retained shall be fenced off with protective fencing as set out in the Arboricultural Impact Assessment and maintained for the duration of the building works;

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- that any lighting of the MUGA shall not be permitted without the written consent of the County Planning Authority.

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

- The registering with Kent County Council of the School Travel Plan through the “Jambusters” website following the link <http://www.jambusterstpms.co.uk>;
- That Seal Primary School pursue, as a matter of importance, the reduction of the speed limit to 30mph where the current 40mph speed limit exists on the A25 at Seal Hollow Road; the introduction of a pedestrian phase at the Seal Hollow traffic lights; and the inclusion of Seal Primary School within the ‘Safer School Zone’ programme in the interests of the safety of their pupils and to encourage more sustainable modes of transport;
- That the applicant ensures that all necessary highway approvals and consents are obtained;
- The development should take account of the Bat Conservation Trust’s ‘Bats and Lighting in the UK’ guidance;
- To ensure that works to trees are carried out outside of the breeding bird season and if this is not possible that an ecologist examines the site prior to works commencing.

Case Officer: Helen Edwards

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Background Documents: see section heading
