

Three storey teaching block to accommodate an additional two Forms of Entry, provision of an additional 18 car parking spaces, playground and games court and associated landscaping and ancillary highways works at Wilmington Academy – DA/18/39 (KCC/DA/0353/2018)

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

Erection of a three storey teaching block to accommodate an additional two Forms of Entry, provision of an additional 18 car parking spaces, playground and games court and associated landscaping and ancillary highways works - at Wilmington Academy, Common Lane, Wilmington (KCC/DA/0353/2017) (DA/18/39)

Recommendation: the application BE REFERRED to the Secretary of State as a departure from the Development Plan on Green Belt grounds, and that SUBJECT TO his decision and SUBJECT TO a Memorandum of Understanding regarding the required monetary contribution to ensure monitoring of the Travel Plan that PLANNING PERMISSION BE GRANTED SUBJECT TO conditions.

Local Member: Mrs Ann Allen

Classification: Unrestricted

Members' Site Visit

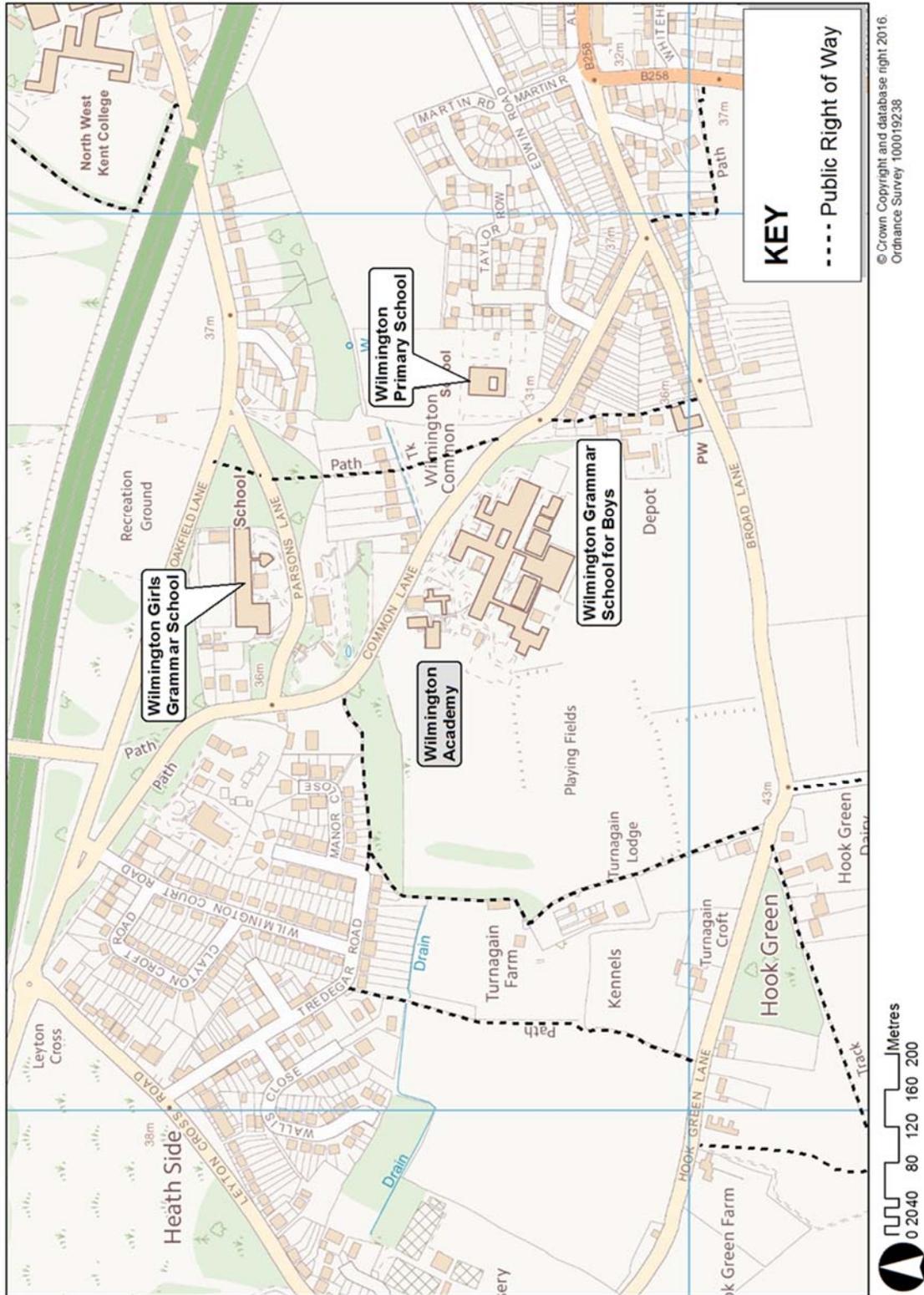
1. A group of Planning Application Committee Members visited the application site on the 19 March 2018 to acquaint themselves with the proposals at both Wilmington Academy and Wilmington Grammar School for Girls and the issues they raise. As part of this visit Members of the Committee walked between the two application sites at the end of the school day.

Application Site

2. Wilmington Academy is located to the north west of the village of Wilmington and is accessed via Common Lane, a road which links Wilmington to Leyton Cross - a small residential area to the north west of the academy site. Dartford town centre is located approximately 2.3kms (1.4 miles) to the north east of the academy site. The whole of the 8.45 hectare (20.8 acre) Academy site is located within the Metropolitan Green Belt. Built development on the site is concentrated to the north east of the site, adjacent to the Common Lane site frontage, with playing fields and open grassland extending to the south and west, beyond which lie agricultural fields and the wider countryside. The northern boundary of the academy site is a wooded steep embankment, beyond which lies Public Right of Way (PROW) DR118A, which links with PROW DR118 which follows the western boundary of the academy site. To the north of the application site, beyond the PROW DR118A, residential properties in Manor Close and Tredegar Road back onto the site from an elevated position. A row of residential properties are located opposite the existing site exit on Common Lane, and face toward Wilmington Common.
3. Planning permission was granted in 2012 (consent reference DA/12/14) for the redevelopment of the academy site, which included the demolition of most of the existing buildings and the erection of a two storey academy building and sports centre, in addition to associated landscape works and the provision of a new dedicated access point leading to 92 car parking spaces and 4 bus drop off/pick up spaces. Previous to

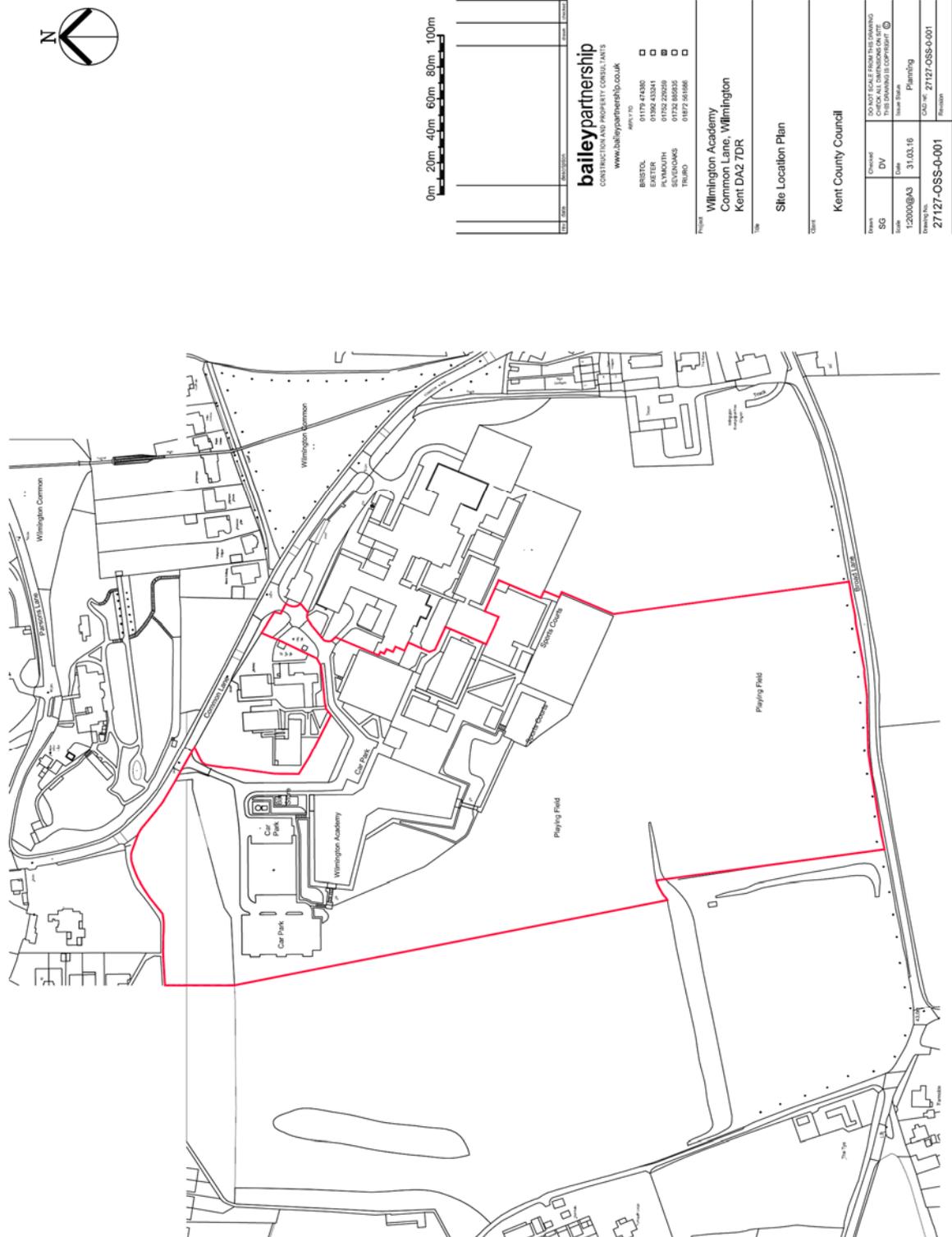
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Site Location Plan



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Existing Site Plan



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CONSTRUCTION AND PROPERTY CONSULTANTS
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- BRISTOL 01179 474300
EXETER 01392 435241
PLYMOUTH 01752 220298
SOUTHAMPTON 01703 600000
TUNBRIDGE WELLS 01827 864866

Project Wilmington Academy
Common Lane, Wilmington
Kent DN2 7DR

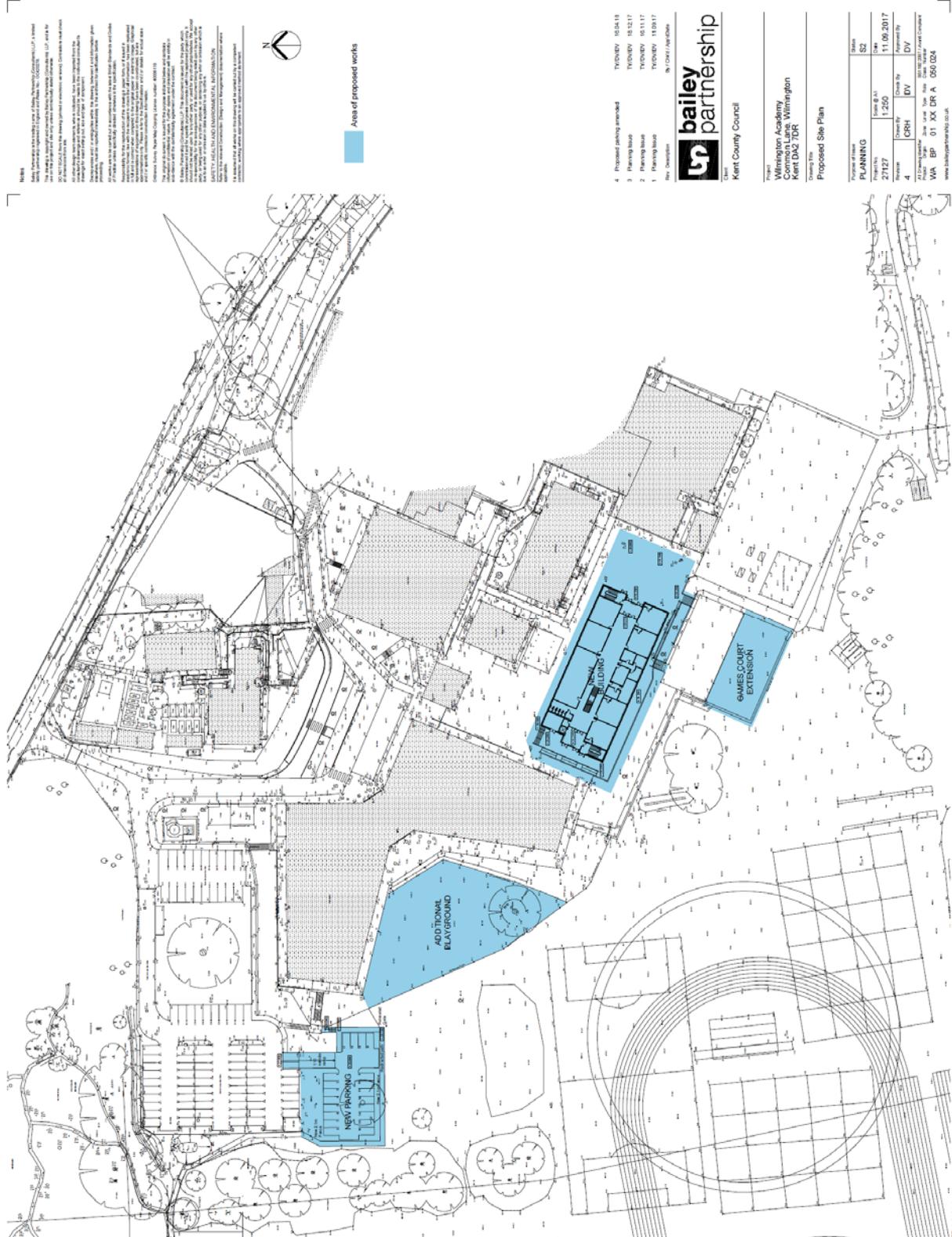
Site Site Location Plan

Client Kent County Council

Project No	27127-OSS-0-001	Client Ref	27127-OSS-0-001
Drawn By	SG	Issue No	1
Checked By	DV	Date	31.03.16
Discipline	Planning	Author	Planning
Revision		Drawn By	SG
		Checked By	DV
		Issue No	1
		Date	31.03.16
		Client Ref	27127-OSS-0-001
		Revision	

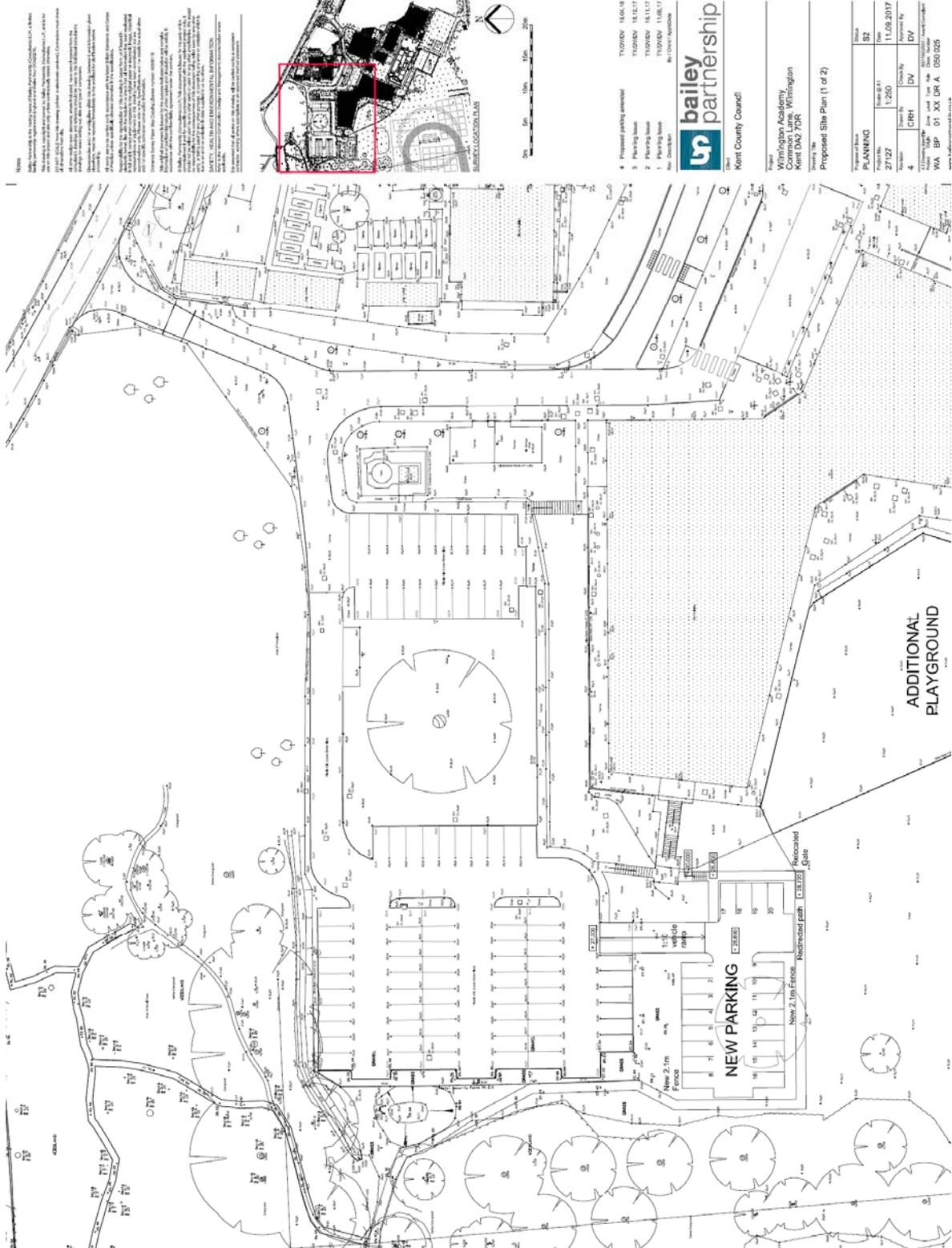
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Proposed Site Plan



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Proposed Car Parking



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that, the Academy operated from buildings that were built in the mid 1970's, which were then split in the 1980's to accommodate two schools, Wilmington Grammar School for Boys (WGSB) and a non-selective secondary school (now Wilmington Academy). The academy continues to occupy the north western side of the site, albeit in a new building, with WGSB (which also has Academy Status) to the south east. The organisation of the whole site is further complicated by a third school, Wilmington Grammar Schools for Girls (WGSG), who own a sports pitch in the south west corner of site and have rights of access through the academy to reach it. The academy and WGSB share one exit point onto Common Lane, with the academy entrance located to the north west of that exit, with a one-way access loop extending up to the frontage of the academy building for pupil drop off linking the entrance and exit. A private nursery is located to the front of the academy site, within the access loop and on the Common Lane road frontage. In addition to WGSB, Wilmington Grammar School for Girls (WGSG) is located to the north of the academy site, accessed via Parsons Lane, which links Common Lane with Oakfield Lane. Further, to the east of the Academy site, Wilmington Primary School is located to the northern side of Common Lane, accessed via Common Lane only.

4. In light of the site's Green Belt designation, this application has been advertised as a Departure from the Development Plan and would need to be referred to the Secretary of State following consideration at Planning Applications Committee if Members were minded to grant planning permission. *A site location plan is attached.*

Background and Relevant Planning History

5. Planning applications to support the permanent expansion of both the Girls Grammar School and Wilmington Academy were originally submitted in 2016, accompanied by applications for the approval of some temporary accommodation to cover the immediate shortfall of space to accommodate additional pupils at each school. The temporary accommodation was given approval, subject to the completion of various highway mitigation measures, as set out in paragraph 17 below. However, the applications for permanent development were subsequently withdrawn after a lengthy consultation period which highlighted major concerns raised by those living in the locality that the village of Wilmington was struggling to cope with the amount of school related traffic. Following the withdrawal of those applications, further discussions between the applicants, planning officers and representatives of the Parish Council, Dartford Borough Council, Wilmington Safer Streets and Ward Members took place, including discussions regarding the highway mitigation measures that would be necessary to possibly make the expansions of the two schools acceptable. Subsequent to those discussions, this application for permanent accommodation at Wilmington Academy (KCC/DA/0353/2017), an application for temporary accommodation for the 2018 pupil intake at Wilmington Academy (KCC/DA/0088/2018), and the associated application for development at Wilmington Grammar School for Girls, (KCC/DA/0002/2018), were submitted.
6. Wilmington Academy has been operating as an Academy since 1 September 2010, originally in the buildings of the former Wilmington Enterprise College. Planning permission was granted in 2012 (consent reference DA/12/14) for the redevelopment of the academy site, which included the demolition of the majority of the existing buildings and the erection of a two storey academy building and sports centre, in addition to

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associated landscape works and the provision of a new dedicated access point leading to 92 car parking spaces and 4 bus drop off/pick up spaces. That redevelopment did not propose any expansion to the Academy and, was designed to accommodate a maximum capacity of 950 pupils.

7. Wilmington Academy is, however, now proposed to expand incrementally over a 5 year period from a 6 form of entry (FE) Secondary School (900 pupils plus sixth form, with a pupil admission number (PAN) of 180) to a 8 FE School (1200 pupils plus sixth form, (total 1325) with a PAN of 240). The 2016 and 2017 allocation of pupils have been accommodated in temporary accommodation (see planning history below), and the current number of pupils on site (as of September 2017) is 1167, which includes 115 sixth form pupils.
8. The table below summaries the relevant planning history at the site:

Application Reference	Description	Decision
KCC/DA/0537/2011 (DA/12/14)	Redevelopment of existing school site to include: demolition of some of the existing buildings, retention of the existing horticulture vocational unit, arts block, sixth form/SEN block and science block and erection of a two storey academy buildings and sports centre. Retention of existing hard surfaced games courts and sports playing fields and creation of new hard and soft play/recreation areas. Provision of 92 on site car parking spaces, 6 motorcycle spaces, 1 minibus parking space, 4 bus/coach pick up/drop off spaces and 146 cycle spaces. Creation of a hard surfaced one way access road. Retention of existing vehicular exit on Common Lane and creation of a new vehicular entrance from Common Lane to the west. Provision of associated hard and soft landscaping.	Approved 09/05/2012
KCC/DA/0430/2012 (DA/13/30)	Temporary siting of two adjacent modular buildings to provide three teaching areas and a small office on an area of the existing hard play surface for the duration of the construction works only.	Approved 12/02/2013
KCC/DA/0088/2016 (DA/16/799)	3 temporary single storey classrooms to accommodate the 2016/2017 allocation of pupils (in conjunction with a separate application to permanently expand the school (DA/16/814 – see below)), two additional bus bays within the academy site, provision of a new footpath link between the car park and PROW DR118/118A to the north west, and widening of a section of footway on Common	Approved 21/12/2016

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	Lane.	
KCC/DA/0085/2016 (DA/16/814)	Erection of a three storey teaching block, creation of a new hard outdoor play area and the provision of additional car parking, together with associated landscaping and ancillary works and internal alterations to the existing Academy buildings.	Withdrawn
KCC/DA/0257/2017 (DA/17/1626)	Retention of 3 temporary classroom units (permitted under consent reference KCC/DA/0088/2016 (DA/16/799)) to accommodate the 2017 allocation of pupils.	Approved 07/11/2017

Amendments Following Initial Submission

9. When first submitted, this application initially included the removal of a London Plane tree from the centre of the existing car park, which provided space for 42 new bays to be formed. As referred to in paragraph 1 of this report, Members of the Planning Committee undertook a site visit and it was during that visit some concern was raised about the removal of the London Plane tree as it is a mature and attractive specimen. In addition, it was suggested that the tree has local historical interest. In response to the concerns raised, this application was amended to propose an alternative car park location which would provide 18 additional bays, enabling the London Plane to be retained. However, that amendment resulted in substantial local objection. The applicant subsequently met with the County Councillor (Ann Allen), Borough Councillors, Wilmington Parish Council and Wilmington Safer Streets (a local action group) to discuss the concerns regarding car parking provision on the Academy site. The applicant advises that it became apparent from that meeting that the vast majority of the local community are far more concerned with the provision of additional parking spaces within the boundary of Wilmington Academy than the retention of the tree.
10. The applicant subsequently took the decision to amend the application for temporary accommodation (KCC/DA/0088/2018) to include the removal of the London Plane tree to enable the provision of the 42 space car park, as originally proposed in this application for permanent accommodation. Whilst the intention is that the 42 space car park would be constructed as part of the installation of temporary buildings (subject to planning permission), the intention is that the car parking would also form part of the highway mitigation for this permanent application. The 18 space car park proposed in this application would not be implemented should the 42 space car park gain planning permission. However, should the 42 space car park be refused planning permission (Item D4 on these papers), the 18 space car park would be implemented (again, subject to planning permission). Hence, the 18 space car park continues to form a part of this application.
11. It is the revised proposal for teaching accommodation, 18 car parking spaces, playground space and a games court extension that will be discussed throughout this report.

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Proposal

12. This application has been submitted by Kent County Council Property and Infrastructure Support, and proposes the erection of a three storey teaching block, the creation of a new hard outdoor play area and games court extension, and the provision of 18 additional onsite car parking spaces, together with associated landscaping and ancillary works. To meet the demand for additional school places, I am advised that the academy requires 10 extra classrooms, five science laboratories (provided by converting existing maths classrooms in the main school building resulting in the need for 8 replacement maths classrooms), two art spaces, a dance and drama studio, a technology space, administration areas and enlarged dining and kitchen facilities. The Academy runs the 'schools-within-schools' model, and currently the accommodation is split into two colleges, spread across the two wings of the existing building (Minerva Wing and Apollo Wing) and the stand alone Jubilee block. It is proposed to add a third college by providing the accommodation outlined above.
13. The applicant is proposing to construct a three storey classroom block on an area of dis-used land largely comprising of a grass spoil mound left from the sites recent redevelopment. The proposed building would be located to the south east of the main academy building, to the south of the Jubilee block. The applicant advises that the proposed building would have a compact footprint, and that its location within the school site has been selected to minimise impact on the openness of the Green Belt whilst also working operationally for the Academy.
14. The rectangular three storey flat roofed building, oriented east west, would be finished in a smooth red faced brick and timber effect cladding, with aluminium rainwater goods, window frames and doors, powder coated grey. Briese Soleil are proposed to the southern elevation to introduce some articulation, and also to prevent overheating of the passively ventilated building. The east and west elevations would incorporate glazed areas to delineate the main entrances to the building, with the north and south elevations incorporating three levels of windows of three varying size combinations.
15. The applicant is also proposing to provide an additional 18 car parking spaces on site, which would bring the total number of car parking spaces to 106. The spaces would be provided to the south of the existing car park, to the west of the main school building, on an area of existing area open land left to meadow. The onsite footpath link to Public Right of Way DR118A (see paragraph 18) runs through this meadow area, and would need to be realigned to follow the perimeter of the extended car park.
16. Additional playground space is proposed to be provided on the 'V' Shape area of grassland located between the two projecting wings of the existing main school building. The mature Giant Redwood in this location is to be retained and its root protection area protected. In addition, the applicant is proposing to extend an existing hard surfaced games court which is located to the south of the proposed building. It is proposed to extend the hard standing to the south to provide additional games court space to meet the requirements of the increased school roll. Existing fencing would be extended accordingly to enclose the enlarged hard standing.

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Highway Mitigation Measures

17. A number of mitigation measures are proposed to support this planning application and the simultaneous application for the proposed expansion at Wilmington Grammar School for Girls. The mitigation measures proposed follow public consultation events held at both schools, and the extensive consultation referred to in paragraph 5 which resulted from the earlier applications. The mitigation proposed is as follows:

- Amendment to build out Parsons Lane – The existing kerb build out on Parsons Lane would be redesigned to reduce the amount of street furniture and provide a more attractive raised table/shared space to prioritise pedestrian movements and maintain low speeds. The existing staff parking area on the south side of the road would be provided with a footway and verge, and the existing guard rail removed to tie in with the proposed raised table.
- Parsons lane bus drop off area – A dedicated bus drop off and turning area is proposed to be provided on an area of the Girls Grammar School site, to the south of Parsons Lane. The existing access on this side of the lane (to an informally used parking area) would be enhanced to provide an entrance to a formal access road that would be 10.5m wide leading to a bus turning area at the eastern end of the site. Bus/coach stopping areas would be provided on either side of this access road, each with sufficient space to accommodate three buses (6 in total). A 1.8m wide footway would be provided on either side of the bus/coach drop off bays tying in with the existing footways on Parsons Lane and the proposed new footpath link (see below).
- Bus Stops on Parsons Lane – It is proposed to relocate the three existing bus stops on the northern side of Parsons Lane by approximately 15m to the east. This would enable buses to exit the drop-off area safely without conflict.
- Wilmington Grammar School for Girls footway – The provision of an additional section of footpath on the northern side of Parsons Lane within the school grounds to more directly link to the proposed raised table top and coach drop off loop.
- Junction between Common Lane and Parsons Lane – The junction would be reconfigured to reduce the width of the bellmouth to prevent vehicles parking and turning in this location. This would be achieved through hatched white lining and double-yellow line parking restrictions. Parking restrictions would also be sought between the entrance to the Grammar School and Common Lane to provide protection against inappropriate parking.
- Parking restrictions – Single yellow lines are proposed to be provided on the northern side of Common Lane to the east of the Academy exit and the provision of bollards on the southern side of the road between the existing zebra crossing and the speed bump to the west of the exit. The 1.5m high bollards would be spaced at 2m apart to prevent parking on this section of the footway.
- Opposite PROW DR 118A on Common Lane – A proposed table top shared surface would be constructed at the point where the PROW meets Common Lane to prevent inappropriate parking, increase safety of pedestrians and reduce vehicle speeds.
- Footpath linking proposed bus drop off area to the Boys Grammar School – A footpath is proposed to link the proposed bus loop at the Grammar School to the Boys Grammar School. There is an existing footpath link through the Girls Grammar School grounds, which leads from the southern side of Parsons Lane southwards to meet Common Lane at the approximate location of the Boys Grammar School and Academy exit. It is proposed as part of this application to enhance that footpath to

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provide a direct route from the proposed new coach drop off to the schools on Common Lane, as an alternative to walking down Common Lane itself.

- Widening of Boys Grammar Access – Proposed that the access into the Boys Grammar School be widened to enable better access for buses routing into the site (which would need to be subject to a separate planning application).
- Additional car parking – 18 additional spaces within the Academy site and 12 additional spaces in the WGSG site.

18. A number of mitigation measures have already been carried out as a result of the temporary permission granted last year which include:

- two additional bus bays within the Wilmington Academy site;
- provision of an onsite footpath link between the Academy car park and Public Right of Way DR 118/118A to the north west (joining with Tredegar road);
- the widening of a section of footway on Common Lane, at the junction with Parsons Lane, by removal of an area of vegetation/scrub;
- the submission of a revised Travel Plan detailing measures and initiatives to be put in place to manage pupil pedestrian activity and encourage use of the internal footway by Academy pupils and other local schools; and
- the resurfacing of Public Right of Way DR118A.

19. In addition, outside of the planning process, it is of note that in recent months a pedestrian crossing has been provided on Common Lane outside Wilmington Primary School, and a 20mph speed limit and a weight restriction have been introduced on Common Lane. White lining has been refreshed and parking restrictions (single yellow line with no parking at peak times) has been introduced to the north of Common Lane adjacent to the Common.

The application is supported by a Design and Access Statement, Planning Statement including an Education Justification Statement, School Travel Plan, Transport Assessment and updated Technical Note, Arboricultural Implications Assessment, Preliminary Ecological Assessment, Structural Appraisal, Building Physics and Part L Compliance Report, MRL Acoustic Report, Phase 1 Ground Contamination Study, Ground Investigation Report, Flood Risk Assessment and Archaeological Desk Based Assessment.

Planning Policies

20. 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

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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;
- that the planning system contributes to and enhances the natural and local environment;
- 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

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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 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.

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. It is the Government’s view that the creation and development of state-funded schools is strongly in the national interest and that planning decision-makers can and should support that objective, in a manner consistent with their statutory obligations.

The Government believes that the planning system should operate in a positive manner when dealing with proposals for the creation, expansion and alteration of state-funded schools, and that the following principles should apply:

- There should be a presumption in favour of the development of state-funded schools, as expressed in the National Planning Policy Framework.
- Local authorities should give full and thorough consideration to the importance of enabling the development of state-funded schools in their planning decisions. The Secretary of State will attach significant weight to the need to establish and develop state-funded schools when determining applications and appeals that come before him for decision.
- Local authorities should make full use of their planning powers to support state-funded schools applications. This should include engaging in preapplication discussions with promoters to foster a collaborative approach to applications and, where necessary, the use of planning obligations to help to mitigate adverse impacts and help deliver development that has a positive impact on the community.
- Local authorities should only impose conditions that clearly and demonstrably meet the tests set out in Circular 11/95. Planning conditions should only be those absolutely necessary to making the development acceptable in planning terms.
- Local authorities should ensure that the process for submitting and determining state-funded schools’ applications is as streamlined as possible, and in particular be proportionate in the information sought from applicants.

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- A refusal of any application for a state-funded school, or the imposition of conditions, will have to be clearly justified by the local planning authority. Given the strong policy support for improving state education, the Secretary of State will be minded to consider such a refusal or imposition of conditions to be unreasonable conduct, unless it is supported by clear and cogent evidence.

(ii) Development Plan Policies

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

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

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

Policy CS16 Seeks to enable the transport network to respond to the pressures of new development, including by securing the provision of off-site highway and local road improvements, and by promoting the use of public transport, walking and cycling.

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

Dartford Development Policies Local Plan (2017)

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

Policy DP2 **Good Design in Dartford:** Development will only be permitted where it satisfies the locally specific criteria for good design in the Borough by (a) reinforcing and enhancing localities to create high quality places, (b) ensuring heritage assets are retained, re-used and respected, (c) facilitating a sense of place through a mix of uses and careful design, (d) providing clear pedestrian and cycle linkages and permeability, active frontages and a mix of buildings and spaces. Provides further advice about determining planning applications in relation to scale, massing, form, materials, Conservation Areas and areas of heritage sensitivity, inclusive, safe and accessible places, management of natural resources and flood alleviation, and appropriate signage and advertisements.

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- Policy DP3** **Transport Impacts of Development:** Development will only be permitted where it is appropriately located and makes suitable provision to minimise and manage the arising transport impacts, in line with Core Strategy Policies 15 & 16. Localised residual impacts on the highway network should be addressed by well-designed off site-transport measures and adverse impacts on residential amenity or the environment must be minimised. Development will not be permitted where the localised residual impacts from the development, on its own or in combination with other planned development in the area, result in severe impacts on one or more of the following: (a) road traffic congestion and air quality (b) safety of pedestrians, cyclist and other road users and (c) excessive pressure for on-street parking.
- Policy DP4** **Transport Access and Design:** Development should be of a design and layout to promote walking, cycling and use of public transport through provision of attractive and safe routes. Proposals should also include appropriate vehicular access arrangements. Development will only be permitted where proposals ensure that the layout and siting of access is acceptable in terms of residential amenity, highways capacity and safety, free flow of traffic, cyclists and pedestrians, and visual impact.
- Policy DP5** **Environmental and Amenity protection:** Development will only be permitted where it does not result in unacceptable material impacts, and consideration must be given to potential amenity/safety factors such as air and water quality, traffic, access and parking, anti-social behaviour and littering, and intensity of use (amongst other matters).
- Policy DP11** **Sustainable Technology and Construction:** Development should be well located, innovatively and sensitively designed and constructed, to tackle climate change, minimise flood risk and natural resource use and must aim to increase water efficiency.
- Policy DP21** **Securing Community Facilities:** New community facilities will be permitted where they are in an appropriate location and of a type and scale to reflect the needs of the communities they will serve.
- Policy DP22** **Green Belt in the Borough:** Sets out 12 aspects against which development in the Green Belt will be assessed, including the consideration of inappropriate development, which by definition is harmful to the Green Belt and would only be approved in Very Special Circumstances; criteria against which to assess harm to the Green Belt; criteria to assess development considered as potentially not inappropriate by the NPPF; those developments that support Core Strategy Policy CS13; the re-use of existing permitted permanent buildings; taking account of the character and scale of existing buildings; criteria relating to extensions to buildings or infilling of previously developed sites; the replacement of buildings; ensuring no loss of the best and most versatile agricultural land; criteria for

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proposals for farm diversification; the use of land for horses or the erection of stables; outdoor sports and recreation uses; and the infrastructure required for such uses.

Policy DP25 Nature Conservation and Enhancement: Proposals should seek to avoid any significant impact on existing biodiversity features, and any potential loss must be mitigated. Enhancement of existing habitats is expected and existing trees should be retained wherever possible. If retention is demonstrated not to be feasible, replacement provision should be of an appropriate tree species and maturity.

Consultations

21. Dartford Borough Council comment as follows on the amended application:

“The Borough Council would still wish to raise concerns about the application but recognise that as additional evidence has been submitted it would appear that there are some very special circumstances in this case and it is for KCC to decide whether these outweigh the harm to the Green Belt and the harm to the transport impacts of the intensified use.

In the Borough Council’s opinion, the application still provides very little assessment of the proposal in terms of the openness of the Green Belt. The proposed extension of the building, will be to the south of the existing school building, creating a 3-storey building on a currently existing hard surfaced area and partly on a grassed area. The Borough Council considers therefore that the proposal must be considered as inappropriate development. Inappropriate development is by definition harmful to the Green Belt and should only be approved in very special circumstances. The NPPF advises and is echoed by Dartford Local Plan policy DP22 (2) that “‘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 Council considers therefore that it is for KCC to assure themselves that the harm resulting to the Green Belt can be outweighed by the need for school places.

The Council acknowledge the Very Special Circumstances put forward with the revised application and recognise that KCC education have worked hard to look at the alternatives for school expansion in order to meet the secondary school place need which is current at the moment. The Council still has some concerns about the wider catchment area for the school, including pupils coming from outside Dartford and Kent. The Borough Council understands that KCC cannot control admissions to schools but has concerns that school expansion close to the boundary with London is likely to encourage more pupils from outside of Kent and from the rural area, rather than from the Dartford urban area, where it is identified that the need arises.

The Council has also considered the other harms arising from the proposal in accordance with the criteria of Policy DP22.

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DP22(3)(a): the extent of intensification of the use of the site

The Council has concerns that the current proposal results in an intensification of the use of the site and adjacent land, reducing the site area that is open and reducing the areas of soft landscaping as well as resulting in increased activity which results in impact on the surrounding area, as set out below.

DP22(3)(b): Impact of an increase in activity and disturbance, including traffic movement, parking, light pollution and noise

Although the applicants' agents dismiss the traffic impacts of the proposal, and notes that Wilmington Academy is 3 years into that, so only 2 further year groups of 2FE expansion are necessary, which they advise relates to 25 trips in the morning peak and 16 trips in the afternoon peak. This seems to be a low proportion compare to the TA assessment for a full 2 FE expansion. However, the Council consider that this is a matter for KCC highways.

Given the rural nature of the surrounding roads and the narrow width of footways resulting in existing conflict between cars, buses, coaches, cyclists and pedestrians in the surrounding area even this limited increased in car trips is likely to result in some additional harm.

The application refers to the off-site mitigation measures which are submitted with the Wilmington Grammar School for Girls application. In the Council's opinion these are required to improve the existing situation and areas of conflict. The application includes a Travel Plan, but since the red line application boundary does not relate to the whole site the Council is concerned that this cannot be required to be delivered for the whole school through conditions. In addition, the Travel Plan, itself, is a set of desirable options but the Council is concerned that there are no obligations on the school to achieve the targets set or any penalties should they fail to achieve greater modal shift. If the County Council are minded to approve this planning application it is recommended that they ensure these mitigations and Travel Plan commitments can be enforced.

The Council acknowledge that KCC education have worked with KCC highways to seek to improve highway safety in the area, but the Council remains concerned that this is seeking to improve an existing poor situation and may not mitigate the additional impacts of the proposed expansion of the two schools.

In conclusion, therefore, the Council considers that the proposal is inappropriate development in the Green Belt and results in other harm with regard to transport issues, encouraging car use in the Borough contrary to the adopted Local Plan strategy, and impact on the character and visual amenity of the amenity. The Council recognises however, that based on the additional information submitted with regard to the need for additional permanent school places and the lack of options that can provide such places quickly that this could amount to Very Special Circumstances particularly when taking into account the welfare of the children involved who live in the Borough and who may be denied a school place in the local area if there is insufficient secondary school place provision.

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Finally, the Council recognise that there is an increasing demand for secondary school places in the Borough and has been working with KCC education for a number of years to plan for these. The Council would emphasise that is willing to assist the County Council with regard to education growth and help them respond to the changing demands in the future better in order to minimise the conflict with other planning policies.”

Wilmington Parish Council raise strong objection to this application (and the other application currently being considered by the County Council for the expansion of the Girls Grammar School (WGSG)) and comment as follows on the original proposal (comments on the amended proposal summarised after the direct quote below):

“The Parish Council would firstly express disappointment that the notices of the two applications were not issued at the same time as, although it is accepted that each has to be treated on merit, they are indelibly linked since taken together they will greatly impact on the rural setting in which the proposed developments are situated.

The Parish Council accepts and appreciates that the revised applications take into account the comments and objections raised by residents, the Parish Council and Wilmington's elected representatives on Dartford Borough Council when the original expansion proposals for both Wilmington Academy and Wilmington Grammar School for Girls (WGSG) were published. It is acknowledged that some highway and traffic control concerns raised at that time have already addressed and introduced for which the Parish Council is grateful but must stress that these go no way to resolving the extreme problems that arise at the start and the close of the School Day.

However, the Parish Council is still of the opinion that the revised plans for both the Academy and WGSG are contrary to Dartford Borough Council's Development Plan adopted in July 2017. Policy DP3 ('Transport Impact of Development') states -

1. *Development will only be permitted where it is appropriately located and makes suitable provision to minimise and manage the arising impacts in line with (sic the Borough Council's) Core Strategy Policies CS15 and CS16 and*
2. *Development will not be permitted where the localised residual impacts from the development on its own or in combination with other planned developments in the area, results in severe impacts on one or more of the following -*
 - (a) road traffic congestion and air quality*
 - (b) safety of pedestrians, cyclists and other road users and*
 - (c) excessive pressure for on-street parking*

The Parish Council is of the opinion that the wording at DP3 above permits and gives great weight for the need for the two applications to be jointly considered. The Parish Council considers that the further expansion of both the Academy and WGSG represent an 'over-development' of each site and thereby are 'inappropriately located' with an adverse impact on what is a rural setting.

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The Parish Council notes that within the Transport Assessment submitted in support of the WGSG application the following text appears - 'it is recognised that some parts of the local area are subject to congestion before and after the school day as a consequence of the number of pupils arriving and leaving'. Having accepted that congestion already exists the Parish Council finds it hard to believe that the Academy's projection of 98 additional car journeys in the morning and 70 in the afternoon and WGSG's projection of an additional 22-25 car journeys would not add to the congestion that already exists, despite the proposals contained in the applications for this to be mitigated.

The Parish Council is aware of proposals to also expand Dartford Grammar School for Girls (DGSG). Whilst DGSG is not in the immediate vicinity of the Academy and WGSG, the proposal will generate yet more traffic movements on the roads through Wilmington as the additional pupils are taken to and from that School.

The Parish Council therefore objects in the strongest terms to both the Academy and WGSG applications believing that they represent totally unacceptable over-developments in a rural setting and that the impact of the additional traffic generated would have a detrimental and adverse effect on the community. The Parish Council has received a copy of the very balanced response to the Applications made by 'Wilmington Safer Streets' and agree with all of the very pertinent and constructive comments made.

The Parish Council believes that the above points are wholeheartedly supported by all or at least the majority of the residents of the Parish, many of whom have submitted comments and observations in respect of both Applications. The Parish Council trusts that the real concerns that have been expressed will be taken into account by Members of the Planning Committee when reaching their decision."

With regard to the amended application **Wilmington Parish Council** register, in the strongest of terms, incredulity over the revisions made to the above application. During the consultation on the original plans residents, Wilmington Safer Streets, the Parish Council and the elected representatives on both Dartford Borough Council and Kent County Council lodged a number of strong objections, one of which was the pressures on local roads the proposed expansion would create and at the least there was a need for adequate additional parking to be provided within the Academy's curtilage. However, this appears to have been completely ignored under the revised Plans with the 42 additional parking spaces proposed under the original Plan being reduced to 18, although there has been no reduction in the increased number of students and staff. The Parish Council also note that that the Academy lies within the Metropolitan Green Belt and, whilst it could be argued that the proposed expansion should be regarded as 'very special reasons' to override the protection of the Green Bely, any proposed development should not under any circumstances be to the detriment of the established local community or with a complete disregard of other Policies within the Local Plan. It is the Parish Council's view that the proposed three-storey building is unacceptable being totally out of keeping with the rural setting in which the Academy lies.

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The Parish Council further state that whilst it is known that KCC was opposed to the decision by the Secretary of State to close Oasis Academy Hextable and continued to make the case for keeping that Academy open, the fact remains that had the Oasis Academy been allowed to continue, albeit temporarily under capacity, the current need to expand Wilmington Academy would not have arisen.

Kent County Council Highways and Transportation has considered the mitigation proposed and the supporting information submitted by the applicant and subsequently raises no objection to this application (as amended), subject to the following measures being secured by planning condition:

- Completion of the off-site infrastructure shown on the submitted plans (Drawing 11231T-03), subject to stage 1 safety audit and inclusion of any recommendations, within 6 months of the occupation of the extension;
- In addition to the above it is recommended that new poles and globes be provided at the zebra crossing at the Academy/WGSB exit on to Common Lane to match the brightness of those at the new crossing recently installed by KCC Highways further along Common Lane;
- Submission of a Construction Management Plan for approval by the Planning Authority to include the following: routing of construction and delivery vehicles to/from the site, parking and turning areas for construction and delivery vehicles and site personnel, timing of deliveries; provision of wheel washing facilities and temporary traffic management/ signage;
- Access needs to be maintained to the drop off loops and bus parking areas within the school site to reduce congestion on Common Lane;
- Provision and permanent retention of the vehicle parking spaces shown on the submitted plans prior to occupation;
- Provision of measures to prevent the discharge of surface water onto the highway;
- Within 6 months of occupation of the extension, the submission of an updated School Travel Plan by Wilmington Academy, authorised by the school management team as a specific school policy, for approval by the Planning Authority and monitoring/ auditing of the Travel Plan for a period of 5 years, within which there will be annual updates with funding secured for KCC Highways to ensure adequate resourcing to audit and oversee this process (see below);
- The Academy should be required via an 'informative' to maintain their previously cut back vegetation lines to avoid future growth overhanging the carriageway and footway/footpaths to facilitate pedestrian movement and reduce the likelihood of large vehicles overrunning the footway.

With regard to the funding to ensure adequate resourcing to audit and oversee the Travel Plan, Highways and Transportation will require a contribution a contribution of £1000 per year for 5 years. In this case, Highways and Transportation have accepted that this contribution would cover both the Academy and Wilmington Grammar School for Girls, should permission be granted, due to the close proximity of the two schools.

The full consultation response from Highways and Transportation is attached to this report in Appendix 1.

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Sport England raises no objection to the application and comments as follows:

“The proposed development results in a minor encroachment onto the playing field. However, having considered the nature of the playing field and its ability to accommodate a range of pitches, it is not considered that the development would reduce the sporting capability of the site. As such, Sport England is satisfied that the proposed development broadly meets the intention of the following Sport England Policy exception:

E3 - The proposed development affects only land incapable of forming, or forming part of, a playing pitch, and does not result in the loss of, or inability to make use of any playing pitch (including the maintenance of adequate safety margins), a reduction in the size of the playing area of any playing pitch or the loss of any other sporting/ancillary facility on the site.”

The County Council's School Travel Planner confirms that the Travel Plan meets Kent County Council's criteria and is happy for it to be uploaded to the County Council's online Travel Plan system – Jambusters.

The County Council's Biodiversity Officer is awaiting the submission of additional information before finalising comments on the proposals. Any further views will be updated verbally.

The County Council's Archaeologist no comments received to date

Environment Agency raises no objection to the application subject to a condition regarding ceasing work should previously unidentified land contamination be found. Further informatives are requested regarding waste material.

The County Council's Flood Risk Team (SuDs) raises no objection to the application subject to the imposition of conditions requiring the submission of a detailed sustainable surface water drainage scheme and the submission of an operation and maintenance manual for the sustainable surface water drainage scheme. A further condition is required to control surface water drainage into the ground.

Wilmington Safer Streets (WSS) (a local group set up to campaign for the improved safety of the streets of Wilmington, and at the time writing this report has 686 members) were notified of this application and comment as follows on both this application (as originally submitted) and the accompanying application at Wilmington Grammar School for Girls (WGSG) (KCC/DA/0002/2018):

“Proposed Mitigation

- Amendment to build out Parsons Lane - *WSS support this action*
- Parsons Lane Bus Drop Off area - *WSS support this action*
- Bus Stops at Parsons Lane - *WSS support this action*
- WGSG Footway - *WSS support this action*
- Junction between Common Lane and Parsons Lane - *WSS support this action*

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- Parking restrictions - *WSS support this action, to confirm WSS do not support Double Yellow lines along the village Common side as this would impact residents and events that are held within the community on the Common.*
- Tabletop road surface feature opposite PROW DR118A on Common Lane - *WSS support this action*
- Footpath linking the proposed bus loop to Wilmington Academy and Wilmington Grammar School for Boys (WGSB)- *WSS support this action*
- Widening of Boys Grammar Access - *WSS support this action*

Additional comments regarding the above:

- 1) The new WGSG & WGSB walkway proposed in the permanent mitigation would be accessed by using the old zebra crossing outside of the Academy site. This zebra crossing is dated and has no safety signage which is standard for crossings of 2017/2018. WSS feel that it is paramount this zebra crossing is updated and brought in line with current safety requirements along with the required signage to warn motorists as they approach from a darkly lit hill downwards to the crossing.
- 2) Resurfacing of PROW DR118A - the current surface is loose which makes it difficult for parents to push prams over this surface, and difficult to use by disabled residents and elderly. WSS ask that this is resurfaced to a smoother finish.
- 3) Signage should be increased at the entrance and exit points to Common Lane to include roundels in the road and vehicle activated signs on both Old Broad Lane and The High Road to identify Wilmington as a school safe zone. Currently we have little signage to denote the 3000 pupils in and around this area.
- 4) There are major items that have been overlooked and it is very disappointing to note that the section on Pupil Travel in 5.2 and 5.3 of the Transport Assessment, has not been updated and revisited since our last concerns highlighted in 2015. The Travel Survey data at the Academy of which, 134 pupils participated in, assume on travel for the total attendees at the school which there is currently 1034 and is to be increased to 1323 pupils. Therefore, the response rate is only slightly over 10% for pupils and a 50% response rate from the teachers which is a poor representation. A larger percentage of data would allow a true representation and WSS ask that these surveys are committed to being reviewed again to highlight the traffic and parking issues suffered locally. WSS feel that no assumption can be made on sustainable travel and parking requirement until this data is collated.
- 5) Parking is not sufficient for parents who collect their children. Parent parking in roads surrounding the schools is still a major issue and has been overlooked again in the mitigation. Parents who wish to drive to school create traffic, nuisance parking and have nowhere safe to sit and wait for their children. The support to govern parents parking illegally is limited by Dartford Borough Council (DBC) and the Police due to resources. Parents continue to

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contravene parking restrictions and block elderly resident driveways and leave little room for emergency vehicles. WSS have asked DBC to support residents with additional warden visits and to provide data identifying how efficient current processes and procedures are by way of ticket's given. This is impacting local roads and the community are HIGHLY concerned about the added pressure on traffic, safe parking, air quality and road infrastructure.

- 6) Please note that WSS residents are collating feedback on the negative safety impact of the schools in the surrounding roads and especially where the new Academy walkway exit is situated on Tredegar Road. Parents are using Tredegar Road and Wilmington Court Road as a drop off area which results in the cars speeding through this narrowly parked road. (*NB – a document titled Wilmington Resident Feedback was submitted by WSS on 30 January 2017 which includes the results of a door to door survey and collates feedback/letters sent to WSS regarding these applications*).
- 7) WSS strongly feel that the mitigation offered above should have been implemented years ago on grounds of safety and aside from any expansions. Whilst we would welcome the above measures we feel that for safety to be delivered, it must be at the cost of further expansion with no real understanding of the true impact on roads and communities as the data collated is based on a handful of people replying to transport surveys at the Academy.

The mitigation will offer some solace to the issue at hand and we appreciate the effort that has been made to overcome those issues, but the village and residents are at breaking point.”

Local Member

22. The local County Member, Mrs Ann Allen, was notified of the original application on the 12 January 2018, and the amended application on the 16 May 2018.
23. The two Dartford Borough Council Members for the ward of Wilmington, Cllr Eddy Lampkin and Cllr Derek Hunnisett, were also notified of the application on the 12 January 2018, and the amended application on the 16 May 2018.
24. The County Member and the two Borough Councillors raise objection to this application and the accompanying application at Wilmington Grammar School for Girls (WGSG) (KCC/DA/0002/2018) and comment as follows on the original proposal (comments on the amended proposal summarised after the direct quote below):

“In replying to the above consultations we have considered both applications together as they jointly impact on the community and should therefore be considered as one application in as far as they impact on the community. Our objections however should also be separately recorded against each application.

We acknowledge the work already undertaken by Kent County Council, the Schools and Wilmington Safer Streets to improve the safety for both students and

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other road users, and those as now proposed in these applications in an attempt to further mitigate traffic impact and road safety issues. The proposed measures in the applications, particularly at the WGSG, are most welcomed. However, we contend that the plans for extensions remain contrary to the Dartford Borough Council Development Policies Plan (adopted July 2017) Policy DP3 which states that -

Development will not be permitted where the localised residual impacts from the development on its own or in combination with other planned developments in the area, results in severe impacts on one or more of the following:

- a] road traffic congestion and air quality*
- b] safety of pedestrian's cyclists and other road users.*
- c] excessive pressure for on-street parking*

The planned developments at Wilmington Academy and WGSG impact on all 3 (a, b and c) and are therefore in conflict with the Borough Council's Adopted Local Plan.

I quote from submitted Transport Assessment for the Academy proposal:

"Conclusion of transport assessment, page 40. 10.1.2, 10.1.5 and 10.1.2 in particular... 300 more students...98 more car trips in the morning...70 in the afternoon...'should not have any residual impact in terms of transport'

In addition to that assessment, a further 22-25 car trips are shown in the WGSG Transport Assessment. We therefore do not accept the conclusion of the Transport Assessment. We would also remind Officers/Members that the Academy shares the same site as the Wilmington Grammar School for Boys and is within 100m of Wilmington Primary School, both of which also impact on local residents and the narrow residential roads of Wilmington.

We therefore do not agree with the conclusion that these expansions would not have any residual impact on the area - the Transport Assessment for the WGSG application states "it is recognised that some parts of the local area are subject to congestion before and after the school day as a consequence of the number of pupils arriving and leaving". This is further evidenced by the very large number of resident objections to the highway impact of these applications on the surrounding community.

Although some of the safety concerns of residents have been addressed (we support Wilmington Safer Streets comments as submitted on those matters) the severe traffic impact of the extensions on the community has not been overcome.

We therefore strongly object to the application in that the proposals still represent an unacceptable over-development in what is a rural setting, would have an adverse effect on the community, and have unacceptable transport impacts being contrary to CS15 /CS16 and Policy DP3 of the Dartford Development Policies Plan."

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With regard to the amended application **the County Member and the two Borough Councillors** register, in the strongest of terms, objections to the revisions made to the application, and comment as follows:

“During the consultation on the original plans residents, Wilmington Safer Streets, the Parish Council and ourselves lodged a number of strong objections and concerns , one of which was the pressures on local roads that the proposed expansion would create and that there was a need for adequate additional parking to be provided within the Academy's curtilage as a minimum consideration. This appears to have been completely ignored under the revised plans with the 42 additional parking spaces proposed under the original plan being reduced to 18, although there has been no reduction in the increased number of students and staff.

It should be remembered that the Academy lies within the Metropolitan Green Belt and 'exceptional' circumstances' are required to override the protection of the Green Belt as provided in both Dartford Borough Council's Local Plan and the National Planning Policy Framework. These circumstances should not be to the detriment of the established local community and certainly not without obtaining their support (which is not given) and with a complete disregard of other Policies within the Local Plan. It is our view that the proposed three-storey building is unacceptable being totally out of keeping with the rural setting in which the Academy lies.

We reiterate our objections as submitted in respect of the original Application are still relevant and to be considered in respect of this amended application with the proposed reduction in the additional parking provision adding even greater weight to those objections.”

Publicity

25. The original application was publicised by the posting of 4 site notices and advertisement in a local newspaper, and the individual notification of 87 neighbouring properties. The amended proposal (reduction in car parking provision) was publicised by the posting of 4 site notices, advertisement in a local newspaper, and the individual notification of 291 residents (all those originally consulted and those who made representations on the original application).

Representations

26. At the time of writing this report, 129 letters of representation have been received, 126 raising objection and 3 in support of the proposal (74 objections to the application as originally submitted, and a further 52 objections to the amended scheme including one from the Wilmington Society). Many of these representations relate to not only this application, but the accompanying application at Wilmington Grammar School for Girls (KCC/DA/0002/2018). The key planning points raised are summarised as follows:

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Highway/Access Matters

- Common Lane is a narrow lane, too narrow for vehicles to pass, resulting in buses and large vehicle having to mount the pavement;
- At peak school times the pavements are heavily used due to the amount of schools in the immediate locality;
- Pedestrians, including pupils, have been hit by buses/coaches as they have mounted the kerb;
- The pavements on Common Lane are narrower than the recommended width in places, and are only on one side of the road. Pedestrians often walk in the road to pass others, or are forced into the road due to a lack of space;
- None of the proposed mitigation addresses the dangerous issue of vehicles mounting the pavement to pass each other;
- The junction of Parsons Lane and Oakfield Lane is not suitable for large coaches and buses. Traffic has to come to a stand still to allow them to exit as they have to use both sides of the road;
- Buses should be banned from Common Lane and a bus/coach park provided on Oakfield Lane, or at the least the road should be made one way to prevent vehicles having to pass each other;
- The roads around the Wilmington Schools are already chaos at peak school times, and literally at grid lock;
- There are 3 Secondary Schools, a Primary School and a Nursey all accessed from Common Lane, the road and the village cannot accommodate anymore;
- The village of Wilmington cannot support 3 Secondary Schools so pupils are bussed in or brought by car, few pupils are within walking distance;
- Those that can walk/cycle to school often don't as it is too dangerous;
- Pupils have recently been hit by vehicles when crossing Common Lane. It won't be long until there is a fatality;
- Common Lane is already a dangerous road at peak school times, expansion of the Academy would only make this worse;
- The recently introduced 20mph speed limit on Common Lane is not policed so is ignored. Repeater signs, additional road signs and road markings are required to draw drivers attention to the lower speed limit;
- Recently completed highway works/improvements are welcomed and gratefully received but are not enough to mitigate the impact of existing traffic yet alone any increase;
- Parents and sixth formers park dangerously and in some cases illegally, blocking access for local residents, and more importantly emergency services;
- Paths are blocked by parked cars, resulting in people (including Primary School Children) having to walk in the road;
- Additional onsite car parking is required to enable parents to drop off and pick up pupils within the Academy site;
- A reduction in car parking provision is totally unacceptable and unbelievable;
- Additional parking restrictions should be put in place in the village to prevent parents parking during the morning and afternoon peak;
- Recently introduced parking restrictions are not enforced so are ignored. Rather than introduce more stringent restrictions which would have a negative impact on local residents as they would not be able to park in the evenings/weekends, increase and improve the policing and enforcement of the restrictions that are already in place;

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- The recently constructed footway link within the Academy site, to the rear of the school, and PROW resurfacing has resulted in parents dropping off/picking up pupils in Tredegar Road, Wilmington Court Road and Manor Close. The problem has just been moved from Common Lane to other local roads;
- Parents often park in the nearby Wilmington Manor Care Home (BUPA), which has on occasion blocked access for an ambulance;
- The Transport Assessment refers to data collected in 2016, and in June which is exam time, so is out of date and inaccurate;
- The Travel Plan hands up survey was answered by 134 of the Academies 1195 pupils and 81 of the 184 staff. The data is not, therefore, a fair representation of the whole school;
- Previous Travel Plans (2012) set targets for a 20% reduction in car use. That does not appear to have been delivered;
- There is inadequate signage on Common Lane to warn drivers of children crossing;
- The Schools need to educate pupils on safe cycling, and safe crossing of roads;
- Vegetation along Common Lane needs cutting back as overhanging vegetation further narrows the carriageway;

Other Matters

- There is an empty school within three miles of the Academy which only closed recently and was a secondary school so must have the accommodation required for these additional pupils;
- There is not a local need for additional school places. The need arises from development elsewhere in the Borough (stone and Greenhithe specifically) so a new school should be provided elsewhere;
- Pupils from London Boroughs should not be accepted into schools in the Dartford District;
- The village is becoming overdeveloped which is ruining its rural character and destroying the community;
- The scale of the development is totally out of character with surrounding properties and the Green Belt location;
- There are no special circumstances put forward in this case that would outweigh harm to the Green Belt;
- The proposed building 'is a large timber clad monstrosity', does not match the existing buildings, and is 3 storey whereas surrounding development is 2 storey;
- The building should be reduced in height and its footprint increased;
- The application does not meet the requirements of local and national Planning Policy and Guidance, including the NPPF and the recently adopted Dartford Development Policies Plan, especially Policy DP3;
- The proposal would have a severe negative impact on road traffic congestion, air quality, safety of pedestrians, cyclists and other road users, and would result in excessive pressure on on-street car parking. Policy DP3 of the Dartford Development Policies Plan states that development will not be permitted if its impacts on one or more of the above. This proposal impacts on all of the above;
- The further expansions of the Wilmington Schools represent an unacceptable overdevelopment of a rural village;

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- The development would result in the removal of trees, specifically an historic Category A London Plane (which has significant landscape value such that the previous development of the site was designed around it);
- Wildlife would suffer and habitat would be lost;
- The applications for development and expansions of the Wilmington Schools should be considered together, not in a piecemeal fashion;
- The residents of Wilmington have not been considered at all, and the proposals have not been sufficiently advertised;
- Air pollution is already high in the area, this will only get worse should these expansions be approved;
- The development would increase noise pollution in the village;
- Litter and antisocial behaviour is already an issue, and with an increase in pupil numbers would only get worse
- Local residents are often verbally attacked by those parking anti-socially when asked to move;
- Residents quality of life must be considered;

Support

- Wishes the proposal well;
- Whole heartedly support the construction of new facilities for local schools;
- Moved into the area 23 years ago and the schools have always been there. The impact of them has been minimal, and the proposed development would result in very little change in that regard;
- It is crucial that capacity of schools is expanded to meet demand;
- Without the temporary accommodation, pupils that have been offered a place for September 2018 would have nowhere to go and would have to travel a long way to school.

Discussion

27. In considering this proposal regard must be had to the Development Plan Policies outlined in paragraph 20 above. Section 38(6) of the 2004 Planning and Compulsory Purchase Act states that applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. Therefore, this proposal needs to be considered in the context of Development Plan Policies, Government Guidance, including the National Planning Policy Framework (NPPF) and the Planning for School Development Policy Statement, and other material planning considerations arising from consultation and publicity. Issues of particular relevance include the need for school places, impact upon the Metropolitan Green Belt, highway implications and access, general amenity matters, and whether the development is sustainable in light of the NPPF.
28. Development Plan policies seeks to require developments to be sustainable, well designed and respect their setting. This is particularly relevant to this development site which is identified within the Development Plan as being within the Metropolitan Green Belt. Policy CS13 of the Dartford Borough Core Strategy, and Policy DP22 of the Dartford Development Policies Local Plan seek to resist inappropriate development within the Green Belt, unless justified by exceptional circumstances.

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29. The NPPF, section 9, paragraph 80 (section 13, paragraph 133 of the 2018 Revised Draft) states that the Green Belt serves five purposes:
- a. to check the unrestricted sprawl of large built up areas;
 - b. to prevent neighbouring towns merging into one another;
 - c. to assist in safeguarding the countryside from encroachment;
 - d. to preserve the setting and special character of historic towns; and
 - e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

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

Green Belt Considerations

30. By virtue of the criteria in the NPPF, and various Local Plan Policies, the development is considered to be inappropriate in Green Belt terms. Although paragraph 89 of the NPPF lists examples of development that could be considered appropriate within the Green Belt, I am of the view that the proposals would not meet these exceptions and that the development is, therefore, inappropriate development in the Green Belt. Inappropriate development is, by definition, harmful to the Green Belt and it is for the applicant to demonstrate why permission should be granted with regard to planning policies and other material considerations. Such development should not be approved, except in very special circumstances. It is, therefore, necessary to consider the impact of the development against Green Belt Policy, to consider the impact on the openness of the Green Belt and whether or not there are very special circumstances that would warrant setting aside the general presumption against inappropriate development.
31. A Planning Statement was submitted in support of this application, which sets out what the applicant considers to be the very special circumstances that warrant setting aside the general presumption against what would be inappropriate development in the Green Belt. The applicant considers the following ‘very special circumstances’ are sufficient to collectively outweigh a Green Belt policy objection:
- i) The identified need for additional Secondary School places within the Dartford Borough;
 - ii) National Policy and Central Government Support for the delivery of State Funded Schools;
 - iii) A lack of suitable alternative development options; and
 - iv) The limited impact of the development on the openness of the Green Belt, including providing the minimum amount of accommodation required;

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Each of these ‘very special circumstances’ as put forward by the applicant will be considered and discussed in the following section of this report. I will take each point in turn, first considering the case of need for school places in the Dartford Borough.

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

32. As outlined in paragraph 20 of this report, great emphasis is placed within planning policy generally, specifically paragraph 72 of the NPPF, on the need to ensure that a sufficient choice of school places is available to meet the needs of existing and new communities. The NPPF states that Planning Authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. The NPPF further states that Planning Authorities should give great weight to the need to create, expand or alter schools. The Policy Statement – Planning for Schools Development (15 August 2011) also sets out the Government’s commitment to support the development of state funded schools and their delivery through the planning system. There is a presumption in favour of the development of state funded schools expressed in both the NPPF and the Policy Statement – Planning for Schools Development.
33. Kent County Council, as the Strategic Commissioner of Education Provision in the County, is responsible for ensuring that there are sufficient school places of high quality for all learners. As set out by Kent County Council (as the Education Authority), the Wilmington and South Dartford urban areas have been seeing an upsurge in demand for secondary school places. This increase in indigenous demand is caused by changing demographics in the area. In addition, there is new demand from the large and medium scale housing and urban developments which are taking place in the area. This growth is bringing new families to the Dartford Borough requiring enhancements to the infrastructure in order to meet the future needs of the town and its residents. Compounding this issue was the closure of Hextable Oasis Academy by the Education and Schools Funding Agency, a closure which was robustly objected to by the County Council. Replacement school places had to be provided in the local area, meaning that pressure for school places materialised a lot earlier than anticipated.
34. The applicant advises that the need for secondary school places has been mitigated in the short and medium term by the introduction of just under 8 forms of entry (FE) across the Dartford District. The Education Authority has provided these places by expanding the pupil admission number (PAN) at the following schools:
- Dartford Grammar School for Girls (bulge intake of an additional 20 pupils per year)
 - Leigh UTC (new build 4FE school)
 - Wilmington Grammar School for Girls (1FE uplift) and
 - Wilmington Academy (2FE uplift)

The applicant further advises that even with the above expansions, which includes Wilmington Academy, there is barely sufficient capacity, and no scope for parental preference.

35. The 2018–2022 Kent Commissioning Plan (prepared by the County Council as Education Authority) provides forecasts that indicate an increase in the demand for

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secondary school capacity. Furthermore, this increased demand shows no signs of reducing over the forecast period. The forecast surplus/deficit of places for both year 7 and for all year groups is shown in the table below.

	2016-17 capacity	2018-19 (F)	2019-20 (F)	2020-21 (F)	2021-22 (F)	2022-23 (F)	2023-24 (F)	2023-24 capacity
Year 7	1,633	49	-19	-61	-107	-180	-186	1,735
Year 7-11	7,913	362	306	150	-19	-341	-576	8,735

36. However, the applicant advises that these forecasts only include limited moderation to take into account the new house building that is taking place in Dartford Borough. Much of the demand from those developments would be met by a new school in Ebbsfleet, Northern Dartford. However, the demand shown above, plus further demand generated from ongoing large-scale development outside of the Ebbsfleet Garden City, must be met through the utilisation of bulge year groups within existing Secondary Schools until a new school can be provided in Northern Dartford.
37. Wilmington Academy has been admitting increased pupils since 2015, following the closure of Oasis Academy Hextable, with the increase in PAN accommodated in temporary buildings and by internal adaptations. The forecasts for Dartford Borough support the view that without the permanent expansion to Wilmington Academy, the local authority would fail to meet its statutory obligations to provide sufficient school places in the area for the next and future September intakes. The Education Authority has given careful study to all the options available and is of the firm opinion that the expansion of Wilmington Academy is one of a number that are necessary for the Dartford Borough area. If this expansion does not proceed, the deficit of places will worsen because of the limited options for alternative expansions within the wider Dartford Borough area.
38. It must be also be noted that the projected deficits in Secondary School places (as shown in the table above) have been calculated with the 2FE expansion to Wilmington Academy already included within the capacity figure. That means that if planning permission for accommodation for the expansion is not achieved, for each of the Year 7 numbers in the table the deficit will increase, with corresponding pressure on total 7-11 roll, as shown in the table below:

	2016-17 capacity	2018-19 (F)	2019-20 (F)	2020-21 (F)	2021-22 (F)	2022-23 (F)	2023-24 (F)	2023-24 capacity
Year 7	1,633	49	-79	-101	-167	-240	-246	1,735
Year 7-11	7,913	362	246	20	-199	-581	-936	8,735

39. In addition to the forecasts above, the applicant confirms that the latest information on preferences and subsequently the outcome of National Offer Day (1 March 2018) shows demand has increased beyond that projected within the 2018-22 Kent Commissioning Plan. Without further expansion or new provision, the Year 7 places available in Dartford would be 1,735 as shown in the last column of the above tables. However, due to

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additional pressures being anticipated following a review of the first cut of preferences, four schools across the district agreed to admit over their planned admission number (PAN) for 2018/19, providing an additional 53 places, meaning 1,788 places were available for National Offer Day. Bearing in mind that this total number of places already includes the increased intake for Wilmington Academy, following National Offer Day, Dartford District was left with only 6 places remaining in year seven for the 2018/19 Academic Year. This is before the second admissions round in April and any further in year admissions.

40. In summary, the applicant advises that the expansion of Wilmington Academy is proposed due to a number of key factors:
- 1) Increased demand in Dartford town and surrounding areas means that there are very few options for parents(as detailed above);
 - 2) Wilmington Academy sits very close to the area of greatest need;
 - 3) The size of the school site is adequate;
 - 4) Headteacher and governors are supportive;
 - 5) Ofsted have graded the school as “Good”;
 - 6) Proposed new schools are some three years away from delivery, by which time the Year 7 deficit would be more than 3FE.
41. The applicant has explored all options to meet the statutory need to provide school places to meet the need of pupils in this part of the County, including the expansion of other schools. In this case, the applicant has worked with those objecting to the proposal and the Highway Authority to prepare a detailed mitigation package to minimise the impact of the development on the local community, to be discussed later in this report. In the absence of a planning permission the Education Authority advises that the following would occur:
- 1) For the short and medium term (1 – 4 years) Kent County Council would be unable to meet its statutory duty of providing a school place for every young person in the area. This would result in severe reputational damage to the County Council;
 - 2) There would be a negative impact on local families and children’s potential educational performance through children having to travel much further to school each day;
 - 3) By 2019 there would be a deficit of more than 3FE of Secondary provision and this could not be covered by purely introducing single years of expansion (commonly known as bulge years) in existing schools;
 - 4) Wilmington Academy would be left with a number of much larger cohorts in four of its year groups with insufficient and inadequate accommodation to enable the school to provide the best educational opportunities for students;
 - 5) The further planned highway mitigation measures (car parking and off-site improvements in this application, and other mitigation offered in application reference KCC/DA/0002/2018 at Wilmington Grammar School for Girls), that many residents already feel are essential, would not be undertaken as they are part of the permanent build works.
42. Based on the above, in my view, it is evident that a clear case of need for additional secondary school places within Dartford exists. Much of the Borough is within the Metropolitan Green Belt and it needs to be borne in mind that the Green Belt covers a wide area where people live and that these people need local school facilities just as

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much as those outside of the Green Belt. The applicant has demonstrated that there is an existing shortfall of places within the local area, and a future need which will be further outstripped by demand unless additional places are provided. Support for the provision of school places is heavily embedded in the NPPF, the Planning for School Development Policy Statement, and local Planning Policy, and I consider that the need for the development should be given significant weight in this instance.

Alternative Development Options

43. As part of the applicant's case of very special circumstances, alternative development options have been assessed and the applicant has concluded that the development as proposed is the only viable option available. Having accepted a need for additional school places within the Dartford Borough, and consequently a need for additional places to be provided at Wilmington Academy (in addition to other local schools) the alternative development options available must be discussed. First, Wilmington Parish Council, the local County Council Member (Ann Allen), the Borough Council Members for the ward of Wilmington and local residents have questioned why the additional school places cannot be accommodated at the vacant Hextable Oasis Academy site.
44. As stated above, Hextable Oasis Academy was closed by the Education and Schools Funding Agency in 2015 following representations made by the Oasis Academy Trust. Kent County Council as Education Authority robustly objected to that closure. However, to reopen that site a new school would have to be established which, under current legislation, could only be opened as a free school. In considering this Central Government legislation, it is not considered that a free school could be established and set up in time to meet the urgent demand for places (establishing and opening a free school typically takes 3 - 4 years). Further, the applicant advises that use of the Hextable site was further discounted because the Swanley/Hextable area is adequately served by the Orchard Academy in Swanley. The Hextable site is outside of the Dartford catchment area and, in addition, the most expedient route from Dartford to Hextable is through the village of Wilmington. In any instance, the applicant advises that the accommodation on the Hextable site is dated and would require significant investment for it to meet modern infrastructure needs. I am therefore satisfied that the setting up of a new school is not practicable within the required times frames due to the Government's Free School initiative, and further the Hextable site is outside of the catchment area that it would need to serve.
45. The ideal scenario in providing the required accommodation to cater for the need for additional school places would be to locate the development on land outside of the Green Belt. However, as outlined above, the opening of a new school, whether Green Belt or not, is a 3 to 4 year process and therefore not an appropriate solution in this instance. An annex on another site within the Borough would also not be an option as it would result in fragmentation of the education services offered by the Academy, a need for the duplication of ancillary facilities and, the applicant advises, would be ultimately unmanageable. Moreover, as with the Academy site, schools local to the Academy are also within the Green Belt so the same constraints would apply in that regard.
46. Having accepted that offsite alternatives are not practicable, development options within the existing Academy site must be considered. Although the whole of the Academy site

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is within the Green Belt, arguably development in some areas of the site would have a lesser impact on the openness on the Green Belt than others. Alternative locations within the school site were considered by the applicant but were discounted as they would have resulted in a loss of playing field, impacted upon car parking, resulted in a loss of important habitat areas and/or were not of a sufficient size. Further, alternative locations were also considered to have a greater impact on the openness of the Green Belt by virtue of being in more open areas of the site and also in more prominent locations due to the elevated position of the playing field.

47. The location of the proposed building was considered by the applicant to be not only the least intrusive location within the academy site, and also the only available and practicable location. The building would be predominately located on an area of hardstanding, surrounded on three sides by the existing academy buildings. The close proximity to the existing buildings would also be advantageous to the operation of the academy. Further, the proposed siting would have no impact on trees and/or planting, would not encroach onto the playing field, would have a limited visual impact and does not adversely affect the amenity of properties surrounding the school site.
48. With regard to the additional playground space and games court extension, I am satisfied that both of these elements of the scheme are proposed in the most logical and appropriate locations. Alternative locations within the site would be disjointed from the existing games courts and/or remote from the building so would not be practicable. With regard to the proposed 18 space car park, as outlined in paragraphs 9 & 10 of this report this application originally included a 42 space car park which is now proposed within the application for temporary accommodation (Item D4 on these papers). Should that 42 space car park gain planning permission, the applicant has confirmed that the 18 space car park proposed in this application would not be implemented. However, I consider the siting of the 18 space car park to be appropriate as alternative locations away from the existing car parking would not be practicable for management, safety or space reasons.
49. In considering the above, I am satisfied that the location and siting of the development is the most viable and logical within the academy site. The impact on the openness of the Green Belt will be discussed below.

Impact on the Openness of the Green Belt

50. This application proposes development that would encroach into the Green Belt, which could harm its openness. First, it is important to note that the site is well screened from public views by the existing academy buildings, and mature boundary planting and screening. However, openness of the Green Belt is described as an 'absence of development' irrespective of the degree of visibility of the land in question from public vantage points. Therefore, any physical development within the Green Belt, whether visible or not, would have some impact on the openness. Whether that impact is either acceptable or unacceptable is a matter of fact or degree based on the specifics of each case.
51. The applicant advises that the siting of the new school building has been carefully considered so as to minimise its impact on the openness of the Green Belt. As detailed

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above, the proposed building would be predominately located on an area of hardstanding, surrounded on three sides by the existing academy buildings. The building would therefore be viewed against the backdrop of the existing school buildings, set within a space that is enclosed by existing school building. Further, as can be seen from the site plans, the footprint of the building would not extend the building line of the academy further to the south, into the open areas of the site. As such, I am satisfied that the siting of the development is the most appropriate location within the site in terms of limiting the impact of the proposed school building on the openness of the Green Belt.

52. Further, those objecting to the application consider the 3 storey building to be out of keeping with the surrounding school buildings, and of a scale that is not appropriate for the site Green Belt location. The proposed building would measure 51 metres by 22.2 metres, and would be 11.8 metres in height at parapet level, and I am advised by the applicant that only the accommodation essential to meet the requirements of the curriculum is proposed. The building is therefore the smallest it can be, whilst providing the required accommodation, especially as all options for internal alterations to the existing building have been explored and implemented. However, the building would sit against a back drop of two storey buildings, which are not significantly lower in height than the classroom block proposed. The parapet height of the proposed building would be only 1.36 metres taller than the adjacent academy sports hall parapet and 1.53 metres taller than the adjacent pitched roof ridge level.
53. On this basis, I am satisfied that the proposed building is of an appropriate scale and massing for the academy site when considering that the siting of the building is within the extent of existing built development, and that the building would be viewed against a back drop/in the context of existing academy buildings which are of a similar scale.
54. With regard to the additional playground space, games court extension and 18 space car park, as stated above I am satisfied that these elements of the scheme are proposed in the most logical and appropriate locations. These elements of the development are 2-dimensional engineering solutions, located adjacent to existing car parking/hardstanding/games courts, in locations that are well screened from public vistas. As such I am satisfied that they would not have a significant detrimental impact on the openness of the Green Belt.
55. In considering the above, I am satisfied that the proposed development would have a limited impact on the openness of the Green Belt. Whilst there is inevitably some impact on the Green Belt, I am satisfied that the presence of the new building, car parking, playground and games court, would be contained within the immediate context of Academy development, and that the effect on the openness of the Green Belt would be limited. In my view, the proposed layout represents the option which strikes the best balance between minimising intrusion into the Green Belt and providing sufficient accommodation and facilities to enable the Academy to deliver its educational model and operate successfully.

Summary – Very Special Circumstances/Green Belt Considerations

56. Overall, I accept the applicant's assessment and application of Green Belt Policy as set out in the submitted documentation, and I have considered this in the context of the

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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. Nevertheless, in my view, the considerations summarised above are sufficient collectively to constitute ‘very special circumstances’ capable of outweighing harm, in this particular case. Furthermore, I accept that the particular siting and massing of the proposals have been carefully considered to help mitigate the impact of the development on the functioning and openness of the Green Belt. Accordingly, I do not consider that an objection on Green Belt grounds would be warranted in this particular case. However, if Members were minded to grant permission, the Secretary of State for Communities and Local Government would have to be consulted before permission could be granted.

Access and Highway Matters

57. As outlined in paragraph 26 of this report, there is substantial local objection to this application, and to the principle of expanding the Academy and other Schools in the immediate vicinity, based primarily on highway safety grounds and access concerns. Wilmington Parish Council, the Local County Council Member (Ann Allen), and the two Dartford Borough Council Members for the ward of Wilmington (Cllr Hunnisett and Cllr Lampkin) also raise strong objection to this application on the same grounds (in addition to the applications for permanent development at Wilmington Grammar School for Girls (WGSG)). The primary points of local concern and objection relate to a lack of capacity of local roads, and highway and pedestrian safety.
58. As set out in the background section of this report, the applicants have been working towards finding an acceptable solution for the proposed expansion of Wilmington Academy and WGSG in highway and transportation terms since the submission of the previous applications in 2016 highlighted the existing problems experienced in Wilmington as a result of the number of schools in close proximity to each other. It was clear that in order for any expansion to be acceptable, work was required to improve the existing situation in highway terms, and then enhance it again in order to cope with additional pupil numbers in the area. During 2017 a number of measures were introduced on the local highway network which were a combination of actions by Kent County Council and Dartford Borough Council to address existing issues on Common Lane along with approved mitigation for the initial temporary expansion at Wilmington Academy (DA/16/814 (KCC/DA/0088/2016)). These include:
- a new pedestrian route from footpath DR118A in the vicinity of Tredegar Road to the Academy site (a survey on 27 March 2018 indicates the success of this footpath as a total of 161 students were counted using this new route);
 - the widening of the footway on Common Lane between Parsons Lane and footpath DR118A up to the boundary wall which has also improved visibility for pedestrians crossing Common Lane towards footpath DR118A;
 - the resurfacing of Public Right of Way DR118A;
 - the submission of a revised Travel Plan detailing measures and initiatives to be put in place to manage pupil pedestrian activity and encourage use of the internal footway by Academy pupils and other local schools;
 - two additional bus bays within the Academy site;
 - the schools and nearby properties have been required to cut back overhanging

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- vegetation to reduce the likelihood of large vehicles overrunning the footway;
 - carriageway white line markings have been refreshed;
 - a 20mph speed limit has been introduced;
 - a 7.5t weight limit restriction has been introduced on Common Lane, Edwin Road and Parsons Lane;
 - parking restrictions have been extended and bollards placed on the footway near to the access out of the Academy to discourage inappropriate parking; and
 - an additional zebra crossing has been introduced in the vicinity of Wilmington Primary School.
59. At the time of considering the previous temporary expansion, the above measures were considered sufficient to address the initial highway safety concerns raised by KCC Highways and Transportation (H&T). The H&T consultation response attached to this report in Appendix 1 sets out the current situation with regard to highway and access matters, including the results of a 2018 pupil travel survey (69% response rate which is considered representative). I will not repeat that scene setting here, but in summary during school peaks there can be significant levels of congestion on the local highway network, in particular on Common Lane, and the following represent the most recent school survey result with regard to pupils travelling to the academy;
- Walk – 33%
 Cycle – 8%
 Car (entire journey) – 24%
 Car (park away from the site and walk) – 13%
 Car Share – 2%
 Bus - 20%
60. It is proposed that the Academy be expanded from 6FE and 8FE to accommodate up to 300 additional pupils increasing the school roll from 1,023 (900 pupils plus sixth form) to 1,325 (1200 pupils plus sixth form) and staff would consequently increase by 18 from 184 to 202. This expansion was approved by the Education Authority in 2015, and the school have taken an additional 60 pupils in September 2016 and 2017 using temporary accommodation solutions. The September 2018 additional intake is also proposed to be accommodated in temporary accommodation (Item D4 on these papers), meaning that the Academy would reach its expanded capacity by September 2020. However, in considering this application we must consider the impact of the expansion as a whole, from 2015 to 2020, and also consider the cumulative impact of the proposed expansion of WGSG also.
61. A 2015 pupil travel survey showed that 30% of pupils arrived at school by car (higher than the 2018 results above), and that 30% was used by the applicant in their Transport Assessment and subsequent modelling and calculations. The pre-expansion (referred to as existing/current in Appendix 1) total number of car trips (pupils and staff) was estimated at 770 (464 arrivals, 305 departures) in the morning peak between 8am and 9am and 428 (214 arrivals, 214 departures) in the afternoon school peak between 3pm and 4pm. The expanded school total number of vehicle trips is estimated at 964 (569 arrivals, 395 departures) in the morning peak between 8am and 9am and 553 (276 arrivals, 276 departures) in the afternoon school peak between 3pm and 4pm. The additional number of vehicle journeys on the network has been estimated at 195 (105 arrivals, 90 departures) in the morning peak between 8am and 9am and 125 (63

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arrivals, 63 departures) in the afternoon school peak between 3pm and 4pm. This total additional number of vehicle trips is considered a robust estimation in that it assumes a 100% attendance rate and does not account for any pupils or staff and staff arriving or departing outside of the peaks or part time staff or sibling lift sharing.

62. The consultants also consider a further 10% reduction in the total number of school car trips could be achieved through the implementation of an updated School Travel Plan (to be discussed below). From this, with a 10% reduction applied to the total number of car trips generated by the school, the additional number of vehicle journeys on the network has been estimated at 98 (48 arrivals, 50 departures) in the morning peak between 8am and 9am and 70 (35 arrivals, 35 departures) in the afternoon school peak between 3pm and 4pm. To confirm, these figures are the difference between pre-expansion (6FE in 2015) and full expansion (8FE in 2020).
63. Further to the above, by reducing car journeys by 10%, it is assumed that the number of walking journeys would increase by 81 to school and 98 from school and the number of students travelling by bus would increase by 123 to school and 134 from school. The number of these trips would further increase depending on the success of the School Travel Plan (see below).
64. Having established the impact of the 2FE on expansion on vehicle numbers, it is important to assess how these additional car journeys would impact on the local highway network. As detailed in Appendix 1, traffic counts and queue observations have been undertaken on local roads/junctions at peak school times. Background traffic growth has been applied to that count data, in addition to the estimated vehicle movements generated by the expansion of the Academy and WGSG, to provide a 2021 future assessment figure. That figure has then been applied to the local junctions to assess future capacity issues. These figures have been considered and assessed within the submitted Transport Assessment and subsequently by H&T (as detailed in appendix 1).
65. Whilst the additional vehicle movements would inevitably have an impact on the local highway network and junction capacity matters, H&T conclude that the implementation of the School Travel Plan brings the results back to a similar level of congestion and delay projected for 2021 without the school expansions. Further, it should be noted that the junction modelling results are a summary over a one hour period. As observed and in line with other school sites, significant queues and congestion will quickly develop in the peaks at the start and end of the school day and also dissipate relatively quickly compared to other parts of the network. However, it is clear that the School Travel Plan is key to acceptability of this expansion, and this will be discussed later in this report. Further, the offsite highway mitigation measures, primarily proposed in the associated application for the expansion of WGSG, will be also be discussed.
66. With regard to the proposals on the Academy site, as detailed in paragraphs 9 & 10 of this report, initially this application proposed 42 car parking spaces and this was subsequently reduced to 18. This met with significant local objection as overspill car parking on local roads is a major point of concern and frustration to the local community. H&T advise that Dartford Local Development Framework parking standards (2012) apply to developments in the Dartford Borough and require 1 space per 15 pupils and 1 space per 2 classes. This application proposes 60 additional pupils, which equates to

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two classes. Using the Borough Council's parking standards, this application would generate a need for 5 additional parking spaces. The 18 spaces proposed substantially exceeds the required 5, however, an existing shortfall in staff parking provision would be made up by this provision. Therefore, this application would not only provide sufficient parking to mitigate the uptake in pupil numbers but would provide additional parking to aid in reducing existing overspill parking on local roads. In addition, should the car parking proposed under application reference KCC/DA/0088/2018 (the temporary proposal - Item D4 on these papers) be granted planning permission, 42 car parking spaces would be provided on site in lieu of the 18 proposed here. That would be of an even greater benefit in terms of providing onsite car parking to ease existing overspill onto local roads.

67. It is noted that some residents have expressed concern that the onsite footpath link (mitigation approved under consent reference DA/16/799 (KCC/DA/0088/2016)) has resulted in additional traffic in roads at the western end of PROW 118A, such as Manor Close and Tredegar Road. Whilst I would agree that those roads would be used by pedestrians and some parents to a greater level than would previously have been the case, the transport consultants undertook a parking survey on 17 April 2018 and recorded 8 parents parked waiting to pick up at the end of the school day. As stated by H&T, such low numbers would not be considered to have a significant impact and the continued expansion would not exacerbate that situation to an unacceptable level.
68. The mitigation measures outlined in paragraph 58 above were key to addressing the concerns of H&T with regard to the 2016 additional intake of pupils. A key concern of H&T at that time was ensuring that there would be no increase in the number of pupils using the footway to the north of Common Lane, which is often mounted by buses and large vehicles that struggle to pass each other due to the restricted carriageway width. The need to address pedestrian safety, including creating alternative routes away from Common Lane remains a key issue, especially in considering the projected increase in the number of pupils walking to school. Further, the impact of additional journeys by public service vehicles must also be mitigated, both in terms of capacity as well as impact of any additional large vehicles on Common Lane. H&T consider the provision of additional bus/coach waiting facilities to reduce the number of journeys on Common Lane, in addition to the provision of footway capacity away from Common Lane, to be the key issues needing to be addressed in order to support and encourage sustainable journeys to the Wilmington Schools.
69. As a result of the above key mitigation requirements of H&T, as outlined in paragraph 17 of this report, a number of mitigation measures are proposed as part of this application and the associated application at WGSG. The key elements comprise:
- an amendment to the existing build out on Parsons Lane to provide an improved 'raised table' traffic calming and pedestrian crossing feature;
 - a new bus/coach drop off and turning area on WGSG land to the south of Parsons Lane with dedicated bays for 6 buses/coaches as well as 12 additional staff car parking spaces for WGSG staff;
 - 18 additional staff parking spaces within the Wilmington Academy car park;
 - a new footpath route between Parsons Lane and Common Lane linking the 2 schools which crucially will provide a further 'traffic free' alternative to the footway along Common Lane;

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- hatched white lining and double yellow line parking restrictions at the Parsons Lane/ Common Lane junction to discourage inappropriate parking without impeding large vehicles such as buses from turning;
 - relocation of bus stops on Parsons Lane;
 - additional yellow line parking restrictions are proposed on Parsons Lane, between Common Lane and WGSG entrance and on Common Lane, including additional bollards, in the vicinity of the access points to the Academy to discourage inappropriate parking;
 - proposed table top shared surface would be constructed at the point where PROW DR118A meets Common Lane to replace an existing speed hump to reduce vehicle speeds and increase the safety for pedestrians crossing Common Lane; and
 - a widening of the access to Wilmington Grammar School for Boys to enable easier access.
70. These improvements (alongside the other measures previously implemented as part of the temporary expansion of the Academy and by the local authorities outside of the planning process) are considered by H&T sufficient to mitigate the impact of the proposed expansion of the Academy in respect of new infrastructure. The planning merits of the coach park and other matters associated with the development proposed at WGSG will be discussed with the report for Item D6 on these papers, but in terms of mitigating the highway impact of the academy expansion, the proposals are necessary to improve pedestrian safety on Common Lane.
71. With regard to the footpath link between Common Lane and the proposed coach park, this would further reduce the number of pupils using the footway on Common Lane (over above the reduction already seen due to the onsite footpath link to DA118 in the academy site). In association with this, the coach park would remove coach movements associated with the Boys and Girls Grammar Schools from Common Lane by providing a dedicated coach park for the Grammar School vehicles. By reducing the number of pedestrians using the footway on Common Lane, and reducing the number of coaches using Common Lane, pedestrian safety is improved over and above the situation prior to expansion of the schools. Conditions on consent regarding the provision and phasing of the footpath link and the coach park would be attached to the WGSG planning consent, should permission be granted. However, as these elements are also necessary to mitigate the highway impacts of the Academy expansion (in terms of pedestrian safety) I consider it essential that the Academy development would not commence until assurance regarding the implementation of the WGSG development is provided (both subject to planning permission being granted). Should permission be granted, I recommend that a suitably worded Grampian condition be imposed in that regard.
72. With regard to the remaining off-site highway mitigation measures proposed, all measures, where they are on public highway, should be subject to a Stage 1 Safety Audit and any issues raised by the auditor would need to be taken into account as part of any planning permission. Therefore, as required by H&T, I would suggest that should permission be granted, a condition of consent be imposed requiring the completion of the off-site infrastructure shown on the submitted plans (Drawing11231T-03), subject to stage 1 safety audit and inclusion of any recommendations, within 6 months of the occupation of the new building. Further, as required by H&T, an additional condition should be imposed requiring the provision of new poles and globes at the zebra

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crossing at the Academy/WGSB exit on to Common Lane, to match the brightness of those at the new crossing recently installed by KCC Highways further along Common Lane. Subject to these conditions, I am satisfied that highway safety matters are adequately addressed.

73. However, as stated above, the success of the School Travel Plan and achieving the targets set out within it, is a key factor in mitigating the highway capacity issues associated with the school expansions. The school have an up to date Travel Plan, approved by the County Council's School Travel Planner, and dated March this year. However, the delivery of the 10% reduction in total school traffic flows (compared to the 2015 survey) with trips transferring primarily to walking and bus journeys, is an essential part of the overall expansion mitigation. The Academy must 'own' the plan, they must publicise it on their web site, actively implement it and regularly review and update it. To assist schools with this, KCC has a comprehensive range of initiatives including road safety awareness and training, responsible parking initiatives, travel plan writing and monitoring packages and grant schemes to support the introduction of measures, many of which the Academy are already signed up to.
74. The approved Travel Plan commits the Academy to providing staff to oversee traffic and pedestrian movements at the bus drop off within the school, along Common Lane to the north and south of the PROW and at the zebra crossing near the Common Lane exit (this was witnessed on site at the Members Site Visit on the 19 March). The Academy has also been participating as a pilot secondary in the KCC school parking initiative <http://www.responsibleparking.co.uk/>. In addition, further collaboration is proposed with the service bus operators and with the other local schools. It is hoped that these aspects, particularly co-ordination with the other Wilmington schools can be expanded upon given the need to take collective action to address common issues
75. Given the importance of the Travel Plan to the mitigation of the highway impacts of this proposal, Highways and Transportation has requested a contribution of £1,000 per year for 5 years to ensure adequate auditing, oversight and ongoing staff resourcing support. This money would be used by Highways and Transportation, so that they can devote staff time to monitoring and helping the Academy and WGSB manage arrangements effectively on and off site, to help deliver the travel plan targets. It is accepted that this contribution can cover both the Academy and WGSB Travel Plans. In this particular instance, given the sensitivity and complexity of the local issues and the importance of the Travel Plan in reducing car use to ensure that the expansions would not adversely impact upon local road/junction capacity, the Education Authority has agreed to this contribution. As monetary contributions cannot be required by planning condition, a Memorandum of Understanding is required, signed by H&T and the Education Authority, to agree this contribution. Therefore, the recommendation in this report is made subject to receipt of this Memorandum of Understanding. Further, should permission be granted, as required by H&T, a condition of consent would require the submission and approval of an updated Travel Plan within six months of occupation, authorised by the school management team as a specific school policy, and monitoring/ auditing of the Travel Plan for a period of 5 years. The Travel Plan must be subject to annual updates with the funding secured (as above) used to ensure adequate resourcing to audit and oversee this process.

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76. In this case, on balance and in considering the level of mitigation proposed, I am satisfied that this development would not significantly exacerbate existing highway and access matters, including safety concerns to a level to warrant refusal (as set out in Policy Guidance and the NPPF). The NPPF, the Policy Statement Planning for Schools Development, and Development Plan Policies heavily promote the provision of school places and consider that there is a presumption in favour of development unless impacts resulting from the development would be severe. Highways and Transportation have no objection to this application subject to a contribution towards Travel Plan monitoring, to be secured by a Memorandum of Understanding, and subject to the imposition of conditions, as set out above. Subject to the conditions outlined above, I am satisfied that, in this instance, that the proposal would not have a significantly detrimental impact on the local highway network and therefore see no overriding reason to refuse the application on this ground.

Design and Sustainable Technologies

77. Having accepted the siting and massing of the classrooms building within the Green Belt section of this report, it is important to consider the design. The three storey rectangular classroom block is a practical design which maximise the amount of accommodation provided whilst maintaining a compact footprint. When viewed against the back drop of the surrounding educational buildings, the proposed building would sit well within the site and be sympathetic to surrounding development. The applicant has provided indicative details of external materials, as outlined in paragraph 14. However, in my view, it would be appropriate to seek further and final details of all materials to be used externally pursuant to condition, should permission be granted. Subject to the imposition of that condition, I do not consider that the design of the building would have a significantly detrimental impact upon the appearance or amenity of the locality and, therefore, would be acceptable.

78. The applicant advises that sustainable design has been integrated into the building concept. An area on the roof plan has been identified for an array of photo-voltaics (PVs), and the applicant has incorporated passive ventilation and cooling into the design of the building, and electrical and water systems would be designed to limit wastage. In considering the sustainable design credentials of the proposed building, including the provision of an array of PVs, I am of the opinion that the building design is sustainable and require no further details in that regard.

Drainage and Land Contamination

79. 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 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.

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80. 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.

Playing Field

81. In addition to the Green Belt implications of the proposed siting of the development, as discussed earlier in this report, the impact of the proposed development on playing field provision also needs to be addressed. Sport England were consulted on this application as the games court extension would result in the loss of a small area of mown grassland which could form part of the wider playing field. However, Sport England do not consider that the minor encroachment onto the playing field would reduce the sporting capability of the site, and therefore raise no objection to this application. I am therefore satisfied that the development would not have a detrimental impact on the provision of adequate sports facilities at the site.

Ecological and Landscape Considerations

82. As set out earlier in this report (when considering the impact of the development on the openness of the Green Belt), I am satisfied that this proposal would have a negligible impact on the character of the wider landscape as the proposed development would be well screened by existing buildings and planting and also benefit from a substantial degree of separation from public vantage points. With regard to existing trees on the site, a Giant Redwood is located in the southern corner of the area proposed to be surfaced to provide additional playground space. That tree is mature and has an important amenity value within the academy site, and therefore I consider its proposed retention to be advantageous to the overall development proposals. A 'no dig' permeable block paving solution is proposed for the surfacing of the area within the root protection zone of that tree, and I consider that that should be secured by planning condition, should permission be granted. Subject to that condition, I am satisfied that the development would not have an adverse impact on existing trees on the site.
83. In addition to the above, I am satisfied that the development is acceptable in ecological terms. Although we are yet to receive final comments on this application from our Biodiversity Officer, I am satisfied that the information provided by the applicant demonstrates that protected species would not be adversely affected by the proposal. The area of ecological concern is the proposed location of the car park, which has the potential to provide habitat suitable for reptiles. However, the submitted ecological information confirmed that 5 out of the required 7 checks have been undertaken and no reptiles have been found so far. The completed survey will be submitted for comment prior to the Planning Committee meeting, and Members will be updated verbally at that meeting. Subject to no contrary views from our Biodiversity Officer, I am satisfied that the development would not have an unacceptable impact on biodiversity interests.

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General Amenity and Other Matters

84. Other than off-site traffic, highway safety and access matters, the only concerns raised regarding general amenity matters relate to a potential increase in air pollution, and the exacerbation of existing problems regarding anti-social behaviour and the dropping of litter. With regard to design and residential amenity, I am satisfied that the development proposed would be sufficiently distant and screened from local properties to avoid any direct adverse impact. With regard to air pollution, the application site and surrounding locality is not within an Air Quality Management Area so is not an area of poor air quality. I am of the opinion that the resulting increase in vehicle movements associated with the expansion of the Academy would have a minimal impact on local air quality, especially in considering that school traffic has 2 daily peaks, 5 days a week during time term only, and see no reason to refuse the application on this ground. With regard to litter and anti-social behaviour, although regrettable, these matters are outside of the remit of the Planning Authority.
85. The local community also consider that the applications for the expansion of various schools in Wilmington should be considered as a whole, and not dealt with in a piecemeal fashion. However, the County Planning Authority can only process applications for school developments where the County Council is applicant. In this instance therefore, developments at Wilmington Grammar School for Boys and the local Nursery are considered by the Borough Council as the County Council is not promoting the development. Further, the two sites that we are dealing with at County level, Wilmington Academy and Wilmington Grammar School for Girls, are two separate schools and we cannot process one application that spans two sites. The highway implications of these proposals have, however, been considered as a whole, and the cumulative impact is considered in the determination of this application. Staff may have been recruited by the Academy and places offered to pupils, a Planning Authority cannot prevent that, but that is not something that affects the planning process or in any way should suggest a pre-judgement by the Planning Authority.

Construction Matters

86. Given that there are nearby residential properties, if planning permission is granted it would, in my view, be appropriate to impose a condition restricting hours 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.
87. I also consider it appropriate that details of a Construction Management Strategy be submitted for approval prior to the commencement 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 with regard to the construction of the development.

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Therefore, should permission be granted, a Construction Management Strategy would be required pursuant to condition and the development would thereafter have to be undertaken in accordance with the approved strategy.

Conclusion

88. This proposal has given rise to a variety of issues, including the need to demonstrate 'very special circumstances' to justify inappropriate development in the Green Belt, the impact of the proposed development on the openness of the Green Belt, and the impact of the development on the highway network, along with a need to ensure that there is a sufficient choice of school places available to meet community needs. I consider that 'very special circumstances' have been demonstrated in this particular case for overriding Green Belt policy considerations. I also consider that the development has been designed to minimise the impact of the development on this part of the Green Belt, and its functioning. In addition, subject to the imposition of the conditions outlined throughout this report, I consider that the proposed development would not have a significantly detrimental impact on the local highway network, or the amenity of local residents, and would accord with the principles of sustainable development as set out in Development Plan Policies and the NPPF. 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 secondary school places in the Dartford area.
89. On balance, therefore, subject to the imposition of conditions, and an agreed Memorandum of Understanding regarding the required monetary contribution to ensure monitoring of the Travel Plan, I am of the opinion that the proposed development would not give rise to any material harm and is otherwise in accordance with the general aims and objectives of the relevant Development Plan Policies and the guidance contained in the NPPF. Therefore, I recommend that the application be referred to the Secretary of State as a departure from the Development Plan on Green Belt grounds, and that subject to his decision, permission be granted subject to appropriate conditions and subject to a Memorandum of Understanding regarding the required monetary contribution to ensure monitoring of the Travel Plan.

Recommendation

90. I RECOMMEND that the application BE REFERRED to the Secretary of State as a departure from the Development Plan on Green Belt grounds, and that SUBJECT TO his decision and SUBJECT TO a Memorandum of Understanding regarding the required monetary contribution to ensure monitoring of the Travel Plan that PLANNING PERMISSION BE GRANTED SUBJECT TO conditions, including conditions covering:
- the standard 5 year time limit for implementation;
 - the development to be carried out in accordance with the permitted details;
 - the submission and approval of details of all materials to be used externally;
 - the submission of a landscaping scheme, including additional tree planting, soft landscaping, hard surfacing, and ecological enhancements;
 - tree protection methods, as shown on the submitted drawings, to be adopted to protect trees to be retained;

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- no tree removal during the bird breeding season;
- development not to be implemented until assurance regarding the implementation of the WGSG (KCC/DA/0002/2018) development, specifically the coach park and footpath link, is provided;
- Completion of the off-site infrastructure shown on the submitted plans (Drawing 11231T-03), subject to stage 1 safety audit and inclusion of any recommendations, within 6 months of the occupation of the extension;
- Provision of new poles and globes at the zebra crossing at the Academy/ WGSB exit on to Common Lane to match the brightness of those at the new crossing recently installed by KCC Highways further along Common Lane
- 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 an updated Travel Plan within six months of occupation, authorised by the school management team as a specific school policy, and monitoring/ auditing of the Travel Plan for a period of 5 years, within which there will be annual updates with funding secured for KCC Highways (MoU) to ensure adequate resourcing to audit and oversee this process;
- provision and retention of car parking prior to the occupation;
- access to be maintained to the drop off loops and bus parking areas within the school site;
- 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;
- 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 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;

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

- The Academy should maintain their previously cut back vegetation lines to avoid future growth overhanging the carriageway and footway/footpaths to facilitate pedestrian movement and reduce the likelihood of large vehicles overrunning the Common Lane footway.
- 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;

Case officer – Mary Green	03000 413379
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Background documents - See section heading
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APPENDIX 1



Kent County Council
Planning Applications Group
First Floor, Invicta House
County Hall
Maidstone
Kent
ME14 1XX

Highways and Transportation
Ashford Highway Depot
4 Javelin Way
Ashford
TN24 8AD
Tel: 03000 418181
Date: 26 June 2018

Application - KCC/DA/0353/2017

Location - Wilmington Academy, Common Lane, Wilmington, Dartford, Kent, DA2 7DR

Proposal - Erection of a three storey teaching block to accommodate an additional two Forms of Entry, provision of an additional 42 car parking spaces, playground and games court and associated landscaping and ancillary highways works

Dear Mary

Thank you for asking for my views relating to the application for the permanent expansion at Wilmington Academy.

By way of background may I draw your attention to previous KCC Highways responses to the proposed temporary expansion of Wilmington Academy, the first 2 raised holding objections on the basis of the additional trips generated, the evident road safety issues on Common Lane and the inadequate mitigation proposed. In my third response I lifted my objection principally on the basis that the measures proposed (primarily the new footpath into the back of the Academy) would lead to a net reduction in the number of students who walk along Common Lane in peak hours and to ensure safety improvements would be delivered in the near future. A recent application to extend the period of the temporary expansion did not lead to a new highways objection given progress with developing a package of mitigations for this planning application and a concurrent application for permanent expansion at Wilmington Grammar School for Girls (WGSG).

As previously highlighted, these permanent expansions of the Wilmington schools need to be considered collectively, alongside continuing 'organic' growth outside of the need for planning permissions, and a comprehensive package of highway and safety mitigations are needed responding to our concerns previously highlighted.

Our responses recommended a number of measures and investigations to be carried out including the widening of the footway and carriageway on Common Lane, the creation of a direct pedestrian link from Wilmington Academy to footpath DR118A and Tredegar Road and the creation of a further pedestrian route between Parsons Lane and Common Lane through the WGSG site. In addition, recommendations included the need for the Academy to commit to actively manage students and parent parking and

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drop off points within the site and at key access points to the public highway, the ongoing commitment to a bus partnership to manage routing and safer driving practices and to review and update the Academy School Travel Plan to monitor and reinforce the above and to promote sustainable and safe travel practices.

Highways officers have undertaken site visits, we have reviewed representations made and we have attended meetings with the applicants and their transport consultants. I also need to acknowledge the work which has been undertaken by the transport consultants, including their Supplemental Planning Statement dated 3 August 2016, the work to prepare drawing 11231-T10 showing outline proposals for a potential widening of the carriageway and footway along Common Lane. The proposal for the widening of Common Lane was not supported locally, but, in looking for measures to reduce the need for coaches to travel along Common Lane, a significant alternative is now proposed by way of a new coach drop off facility on WGSG land, together with a new footpath from Parsons Lane to Common Lane.

Local Highway Network/ Travel Patterns

The Academy is accessed from Common Lane, an unclassified road with a footway only on the north side for much of its length. Common Lane also serves Wilmington Grammar School for Boys, Wilmington Grammar School for Girls, Wilmington Primary School and Wilmington Day Nursery, all of which are nearby.

There is a one way loop through the Academy site providing for drop offs by car and staff parking and for buses. Vehicles enter from the northern access point on Common Lane and leave via the southern access. The southern access is shared with Wilmington Grammar School for Boys.

Measurements of the width of the carriageway of Common Lane range from 5.3m to 5.7m between the Academy and Parsons Lane. In practice it is difficult for buses/coaches and lorries to pass each other, and buses have been seen overrunning the footway when passing each other, sometimes in close proximity to pedestrians - the majority of whom are children and adolescents.

There is a zebra crossing on Common Lane adjacent to the access to the Academy providing access to the footway to the north side of Common Lane. The footway on Common Lane has some narrow sections down to 1.65m, which is a concern given the large number of pedestrians using it at school peaks. The footway width is 1.54m north of Parsons Lane.

There is a separate pedestrian route into the north west of the site from public footpath DR118A.

There is a bicycle cage storage facility on site with space for up to 50 bikes.

There are bus bays within the on-site loop and nearby public bus stops on Common Lane. In addition there are privately arranged coach services catering for students travelling to the Wilmington schools. From site observations there are a significant number of pedestrian movements along Common Lane including students heading for

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buses/coaches to the north on Parsons Lane, and at other points on the network and the bus stops within the Academy as well as coaches dropping off and picking up from WGSG and the Academy.

During school peaks there can be significant levels of congestion on the local highway network, in particular on Common Lane in the vicinity of the school. As with most schools, the afternoon peak is worse due to longer vehicle dwell times as parents wait to pick up their children which can block through traffic.

A pupil travel survey was undertaken in 2015 which showed the following mode shares - walk to school: 27% / walk from school: 32%, car drop off: 30%/ car pick up: 21% and bus to: 41%/ bus from: 45%. No children were recorded as cycling. Of staff journeys there were 86% by car and 7% walking. The response rate for the pupil travel survey at 10% is very low and cannot be accepted to be representative of the school population as a whole.

Following representations, a further survey was undertaken in 2018 asking pupils how they travelled to school. This showed the following mode shares: walk: 33%, cycle: 8%, car (entire journey): 24%, park (away from the site) and walk: 13%, bus: 20%. These results were from a 69% response rate and can be considered more representative of actual travel patterns.

Road Safety

Road casualty incidents have been investigated for a 3 year period to 31st March 2017. In the vicinity of the school and nearby roads there were 10 crashes resulting in slight injuries across a range of light, weather and road surface conditions. 4 of these involved pedestrians including 2 on Leyton Cross Road, 1 on Oakfield Lane and 1 on Common Lane. On Oakfield Lane a vehicle hit the rear side door of a parked car trapping a passenger in the door. On Leyton Cross Road one involved a pedestrian running into the path of a vehicle and the other a pedestrian struck by a vehicle overtaking a stationary bus. Our records prior to this period (reported in previous consultation responses) and post this period show similar types of collisions occurring. More recently one incident involved a pupil from Wilmington Academy being struck by a car when crossing Common Lane and another involved a pedal cyclist on Oakfield Lane, albeit not directly related to the schools.

These incidents illustrate the problems associated with busy roads, parking pressures, high numbers of pedestrians and relatively narrow footways, and the need, where any increase in the number of child pedestrians is likely, to comprehensively investigate measures which would provide alternative pedestrian routes, wider footways and reduced inappropriate parking.

Recent Highway/ Footway Improvements

During 2017 a number of measures were introduced on the local highway network, including as mitigation for the temporary expansion in advance of this proposed permanent expansion, as well as actions by the County Council and Dartford Borough

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Council to address existing issues on Common Lane and in the vicinity. These included:

- a new pedestrian route from footpath DR118A in the vicinity of Tredegar Road to the Academy site (a survey on 27 March 2018 indicates the success of this footpath as a total of 161 students were counted using this new route),
- the widening of the footway on Common Lane between Parsons Lane and footpath DR118A up to the boundary wall which has also improved visibility for pedestrians crossing Common Lane towards footpath DR118A,
- the schools and nearby properties have been required to cut back overhanging vegetation to reduce the likelihood of large vehicles overrunning the footway,
- two additional dedicated bus bays have been provided within the Academy grounds
- carriageway white line markings have been refreshed,
- a 20mph speed limit has been introduced,
- a 7.5t weight limit restriction has been introduced on Common Lane, Edwin Road and Parsons Lane
- parking restrictions have been extended and bollards placed on the footway near to the access out of the Academy to discourage inappropriate parking, and
- an additional zebra crossing has been introduced in the vicinity of Wilmington Primary School.

Trip Generation

It is proposed that the Academy be expanded to accommodate up to 300 additional pupils increasing the school roll from 1,023 to 1,323 and staff would consequently increase by 18 from 184 to 202. The mode share data from the 2015 travel survey has been used to derive both the current and the new total number of journeys on the highway network resulting from the school.

As the original 2015 mode share data for car trips (at 30%) was higher than that surveyed for the 2018 (at 24%), it is accepted that this is a sufficiently robust assessment.

The current school total number of vehicle trips is estimated at 770 (464 arrivals, 305 departures) in the morning peak between 8am and 9am and 428 (214 arrivals, 214 departures) in the afternoon school peak between 3pm and 4pm

The expanded school total number of vehicle trips is estimated at 964 (569 arrivals, 395 departures) in the morning peak between 8am and 9am and 553 (276 arrivals, 276 departures) in the afternoon school peak between 3pm and 4pm.

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Taking the current vehicle trip rate from the expanded school trip generation, the additional number of vehicle journeys on the network has been estimated at 195 (105 arrivals, 90 departures) in the morning peak between 8am and 9am and 125 (63 arrivals, 63 departures) in the afternoon school peak between 3pm and 4pm.

This total additional number of vehicle trips is considered a robust estimation in that it assumes a 100% attendance rate and does not account for any pupils or staff and staff arriving or departing outside of the peaks or part time staff or sibling lift sharing.

The consultants also consider a further 10% reduction in the total number of school car trips could be achieved through the implementation of an updated School Travel Plan. 10% of these vehicles are therefore taken off from the additional number of vehicle journeys on the network from the proposed expansion.

From this, with the 10% reduction applied to the total number of car trips generated by the school, the additional number of vehicle journeys on the network has been estimated at 98 (48 arrivals, 50 departures) in the morning peak between 8am and 9am and 70 (35 arrivals, 35 departures) in the afternoon school peak between 3pm and 4pm.

By applying the surveyed mode share proportions to the proposed expanded school role, the number of walking journeys would increase by 81 to school and 98 from school and the number of students travelling by bus would increase by 123 to school and 134 from school. The number of these trips would further increase depending on the success of the School Travel Plan.

Impact

Traffic counts and queue observations have been undertaken for weekday 7am -10am and 2pm – 6pm time periods on 7 June 2016 at Wilmington Academy/ Boys Grammar exit on to Common Lane, Parsons Lane/ Oakfield Lane and Leyton Cross Road/ Oakfield Lane. Background traffic growth factors have been applied to the count data to provide a 2021 future assessment year. The additional growth in vehicle movements from the expansion of the Wilmington Academy has been added to this. Further, sensitivity testing has been undertaken adding the proposed expansion of WGSG to provide a comprehensive picture.

The most significant impact by 2021 is at the Academy/ Boys Grammar exit onto Common Lane where there is an 11.3% increase in traffic predicted on the exit arm for the school pm peak. With the addition of the proposed WGSG expansion traffic this increases to 12% and the next most impacted junction is Parsons Lane/ Oakfield Lane at 9.8% more traffic on the exit arm.

With the impact of the School Travel Plan the residual traffic impact at the Academy/ Boys Grammar exit is reduced to 3.8%. This finding underlines the fundamental importance of securing and implementing an effective School Travel Plan.

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Junction modelling has been undertaken by the Transport Consultants to determine the Ratio of traffic Flow to Capacity (RFC) and average queue length expressed in Passenger Car Units (PCU). RFC's of over 0.85 indicate a junction is operating above practical capacity. Leyton Cross Road/ Oakfield Lane in the morning peak is shown to be over practical capacity in 2021. The Leyton Cross Road arm has a RFC of 0.92 and average queue of 9 PCU and the Oakfield Lane (East) arm has a RFC of 0.91 and an average queue of 8 PCU. Addition of the Academy traffic increases RFCs slightly to 0.94 and 0.93 and average queues to 11 and 10 PCUs respectively. Addition of the WGGGS traffic increases RFCs to 0.96 and 0.95 and average queues to 14 and 13 PCUs respectively. Implementation of the School Travel Plan brings the results back to a similar level of congestion and delay projected for 2021 without the school expansions.

It should be noted that these junction modelling results are a summary over a one hour period. As observed and in line with other school sites, significant queues and congestion will quickly develop in the peaks at the start and end of the school day and also dissipate relatively quickly compared to other parts of the network.

It is also noted from site observations that 'link' constraints, from parked cars and buses/ large vehicles on local roads can be more significant than junctions in terms of the efficiency of the highway network.

Whilst not shown to be over capacity, the proximity of the zebra crossing to the Common Lane/ Academy/ Boy's Grammar Exit and the number of children using it, which will increase with the expansions, will impact on the results. However, staff monitoring and control of the crossing at peak times is proposed in this Planning Application to mitigate this impact. This staff presence, which has already been observed in operation from site visits, does clearly benefit the operation of the junction.

Dartford Local Development Framework parking standards (2012) apply to developments in Dartford district. These require 1 space per 15 pupils and 1 space per 2 classes. The proposed 300 pupil uplift and 10 additional classes equates to a requirement of 25 spaces. These standards set by DBC are 'maximums' and as such can be considered in the light of evidence presented as to parking demands. Staff car travel to work was surveyed at 86.4% and so the Transport Consultants state that the 18 additional staff resulting from the expansion will require 16 parking spaces. 18 additional parking spaces are proposed to be provided which is deemed to be adequate to accommodate the additional staff parking demand. It is understood that this is the maximum number of additional spaces that can be reasonably accommodated on the site without taking out the tree in the centre of the car park. With removal of the tree it is understood that staff parking can be increased by 42 spaces, which substantially exceeds DBC parking standards, but would address an existing shortfall in staff parking provision.

In response to concerns about the impact from any additional parking in the Tredegar Road area caused by the temporary expansion and the introduction of the new pedestrian route linking to footpath DR118A, the transport consultants undertook a parking survey on 17 April 2018. They recorded 8 parents parked waiting to pick up at

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the end of the school day, which is not considered to have a significant impact. The photos submitted also support this view.

The impact of the additional journeys on foot on the already congested footways in the area, particularly on Common Lane where the footway widths are limited by a substantial retaining wall to the north and carriageway widths are below 6 metres, is a concern. As discussed, the need to address this pedestrian safety issue including creating alternative routes away from Common Lane remains a key issue which has partly been addressed via mitigation for the temporary expansion of the Academy.

The impact of the additional journeys by public service vehicle must also be considered, both in terms of capacity as well as impact of any additional large vehicles on Common Lane. The provision of additional bus/coach waiting facilities which will reduce the number of journeys on Common Lane as well as additional footway capacity away from Common Lane is a key issue needing to be addressed in order to support and encourage sustainable journeys to the Wilmington Schools.

Mitigation

Mitigation measures have been developed in consultation with local stakeholders and the local authorities and public consultations have been held at the Academy and WGGS. These measures are illustrated on drawing 11231-T-03 P6. The key elements comprise:

- an amendment to the existing build out on Parsons Lane to provide an improved 'raised table' traffic calming and pedestrian crossing feature;
- a new bus/coach drop off and turning area on WGSG land to the south of Parsons Lane with dedicated bays for 6 buses/coaches as well as 12 additional staff car parking spaces for WGSG staff;
- 18 additional staff parking spaces within the Wilmington Academy car park for Academy staff;
- a new footpath route between Parsons Lane and Common Lane linking the 2 schools which crucially will provide a further 'traffic free' alternative to the footway along Common Lane
- hatched white lining and double yellow line parking restrictions at the Parsons Lane/ Common Lane junction to discourage inappropriate parking without impeding large vehicles such as buses from turning;
- additional yellow line parking restrictions are proposed on Parsons Lane, between Common Lane and WGSG entrance and on Common Lane, including additional bollards, in the vicinity of the access points to the Academy to discourage inappropriate parking;

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- a new table top junction on Common Lane at the exit of footpath PROW DR118A to replace an existing speed hump to reduce vehicle speeds and increase the safety for pedestrians crossing Common Lane; and
- a widening of the access to Wilmington Grammar School for Boys to enable easier access for buses.

These improvements (alongside the other measures previously implemented as part of the temporary expansion of the Academy and by the local authorities outside of the planning process) are considered sufficient to mitigate the impact of the proposed expansion of the Academy in respect of new infrastructure.

All measures, where they are on public highway, should be subject to a Stage 1 Safety Audit and any issues raised by the auditor would need to be taken into account as part of any planning permission.

The proposals are presented by the Transport Consultants as a comprehensive mitigation package for the Wilmington Schools which will need to be considered in terms of how they are to be delivered through the planning process which relates to each school individually. This is especially the case in terms of the bus/coach drop off and footpath proposed on WGS land which will also help mitigate the impact of the expansion of the Academy and relieve pressures on Common Lane.

School Travel Plan

Alongside the physical mitigation an updated School Travel Plan has been produced for the Wilmington Academy.

The Travel Plan is put forward in the Transport Assessment as a key element of the mitigation measures, delivering a 10% reduction in total school traffic flows (compared to the 2015 survey) with trips transferring primarily to walking and bus journeys. It is therefore essential that an effective Travel Plan be adequately secured as part of a planning condition and its impact monitored and measured as part of the KCC Jambusters resource at <https://jambusterstpms.co.uk/>

The Academy must 'own' the plan, they must publicise it on their web site, actively implement it and regularly review and update it. To assist schools with this, KCC has a comprehensive range of initiatives including road safety awareness and training, responsible parking initiatives, travel plan writing and monitoring packages and grant schemes to support the introduction of measures.

Importantly, the draft Travel Plan does commit the Academy to provide staff to oversee traffic and pedestrian movements at the bus drop off within the school, along Common Lane to the north and south of the PROW and at the zebra crossing near the Common Lane exit. The Academy has also been participating as a pilot secondary in the KCC school parking initiative <http://www.responsibleparking.co.uk/>

Further collaboration is proposed with bus operators and with the other local schools. It is hoped that these aspects, particularly co-ordination with the other Wilmington schools

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can be expanded upon given the need to take collective action to address common issues. Particularly noteworthy in this respect is the fact that students attending the nearby Grammar Schools benefit from access to be-spoke locally arranged coach services. In the interests of collective action, the potential for Academy students to also use this service should be pursued.

Given the importance of the Travel Plan to the mitigation of the impact, KCC Highways will require a contribution of £1,000 per year for 5 years to ensure adequate auditing, oversight and ongoing staff resourcing support. It is accepted that this contribution can cover both the Academy and WGSG Travel Plans.

Construction

The construction works will need to be carefully planned and managed to ensure the safety of pupils, staff and residents. No traffic movements should occur during school starting and finishing times. Parking areas for construction staff should be identified together with turning and unloading areas for delivery vehicles.

Planning Conditions

In light of the above, the following Highways conditions should be secured as part of any planning consent:

- Completion of the off-site infrastructure shown on the submitted plans (Drawing 11231T-03), subject to stage 1 safety audit and inclusion of any recommendations, within 6 months of the occupation of the extension;
- In addition to the above it is recommended that new poles and globes be provided at the zebra crossing at the Academy/ WGSB exit on to Common Lane to match the brightness of those at the new crossing recently installed by KCC Highways further along Common Lane;
- Submission of a Construction Management Plan for approval by the Planning Authority to include the following: routing of construction and delivery vehicles to/from the site, parking and turning areas for construction and delivery vehicles and site personnel, timing of deliveries; provision of wheel washing facilities and temporary traffic management/ signage;
- Access needs to be maintained to the drop off loops and bus parking areas within the school site to reduce congestion on Common Lane
- Provision and permanent retention of the vehicle parking spaces shown on the submitted plans prior to occupation;
- Provision of measures to prevent the discharge of surface water onto the highway;
- Within 6 months of occupation of the extension, the submission of an updated School Travel Plan by Wilmington Academy, authorised by the school management

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team as a specific school policy, for approval by the Planning Authority and monitoring/ auditing of the Travel Plan for a period of 5 years, within which there will be annual updates with funding secured for KCC Highways to ensure adequate resourcing to audit and oversee this process;

- The Academy should be required via an 'informative' to maintain their previously cut back vegetation lines to avoid future growth overhanging the carriageway and footway/footpaths to facilitate pedestrian movement and reduce the likelihood of large vehicles overrunning the footway.

On the basis of the detailed assessment of the impact of the proposed expansion of the Academy contained within the Transport Assessment for this planning application, and the above measures being adequately secured, I can confirm that KCC Highways do not have reason to object in accordance with the National Planning Policy Framework.

Yours sincerely

David Joyner Transport & Development Manager – West Kent