

**New two storey teaching block and sports hall with rooftop MUGA, drop off loop for 6 buses and 12 parking spaces at Wilmington Grammar School for Girls, Parsons Lane, Wilmington – DA/18/94/CPO (KCC/DA/0002/2018)**

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

Application by Kent County Council Property and Infrastructure Support for the erection of a two-storey teaching block and sports hall with roof top MUGA to accommodate an additional Form of Entry (4FE to 5FE); provision of a drop-off loop for 6 buses; 12 additional car park spaces; rearrangement of the existing hard surfaced games court together with a temporary games court during construction works, associated landscaping, upgraded footpath link and ancillary highway works at Wilmington Grammar School for Girls, Parsons Lane, Wilmington Dartford, DA2 7BB – DA/18/94/CPO (KCC/DA/0002/2018).

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: Ann Allen

Classification: Unrestricted

**Members' Site Visit**

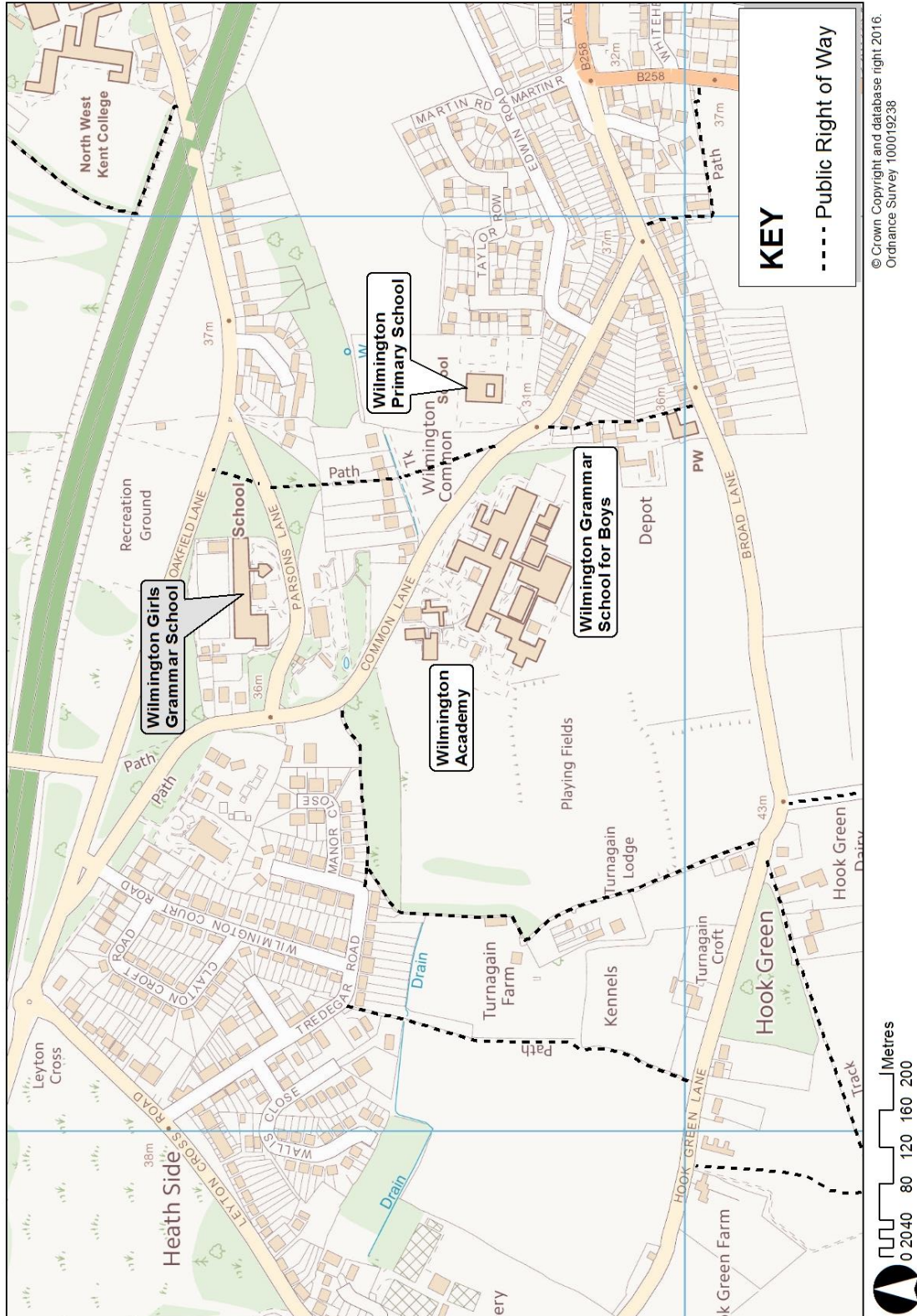
1. A group of Planning Application Committee Members visited the application site on the 19 March 2018 to acquaint themselves with the proposals at both Wilmington Academy and Wilmington Grammar School for Girls and the issues they raise. As part of this visit Members of the Committee walked between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

**Site**

2. Wilmington Grammar School for Girls (WGSG) is located in Parsons Lane in Wilmington, which lies within the Metropolitan Green Belt. The school is located on both sides of the lane – the main buildings are on the northern side, with the Manor House and more undeveloped land being located on the southern side of the road. The Grange, on the northern side of the lane is an old two and a half/three storey yellow brick and tiled building with pitched roofs. Sitting behind and alongside this is a 1960's flat roof two and three storey building which extends across the site frontage which has cream rendered panels and white windows in a uniform pattern. A new three storey curved building has recently been added at the eastern edge of the site, which is constructed with yellow brickwork and dark grey panels. The ground floor for this extension is set down at a lower level than the rest of the site. To the rear of the buildings is a series of hard court sports pitches, enclosed with wire mesh fencing and at the eastern end of the site is one remaining temporary classroom. The Manor, on the southern side of Parsons Lane, is a two storey building, white rendered with black beams to the first floor areas and a tiled, gabled roof. A brick wall with white rendered infill panels fronts the footpath and the building has some single storey additions on the eastern end. At this eastern end of the Manor building the School have sited a double temporary mobile classroom under permitted development rights. The Manor and the informal area of parking to the east are surrounded by mature trees and landscaping.

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**General Location Plan**

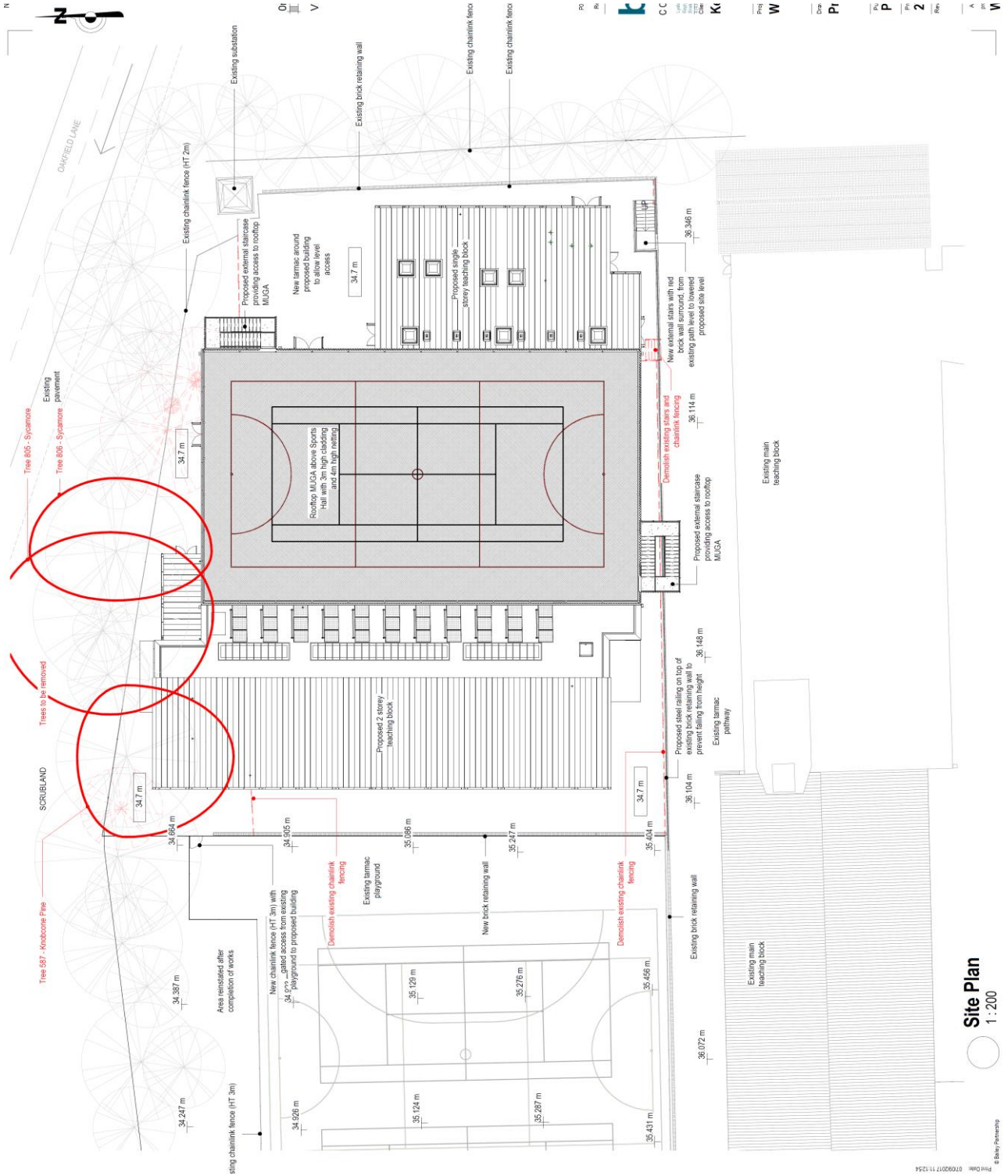






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**Proposed Site Plan**



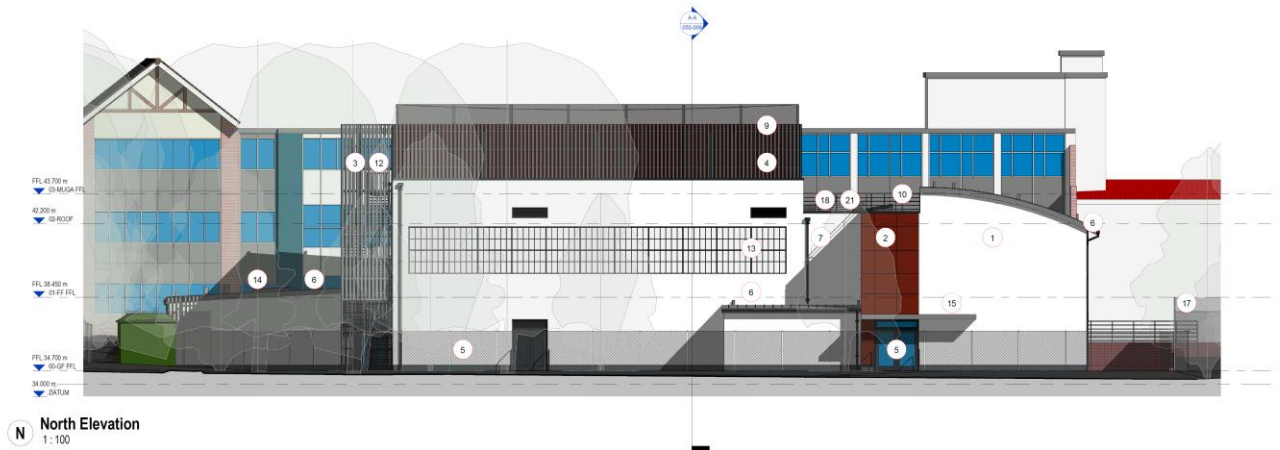
**Site Plan**  
1 : 200

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Plan Date: 07/09/2017 11:12:54

# Item D6

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### Proposed Elevations



**N** North Elevation  
1:100



**E** East Elevation  
1:100

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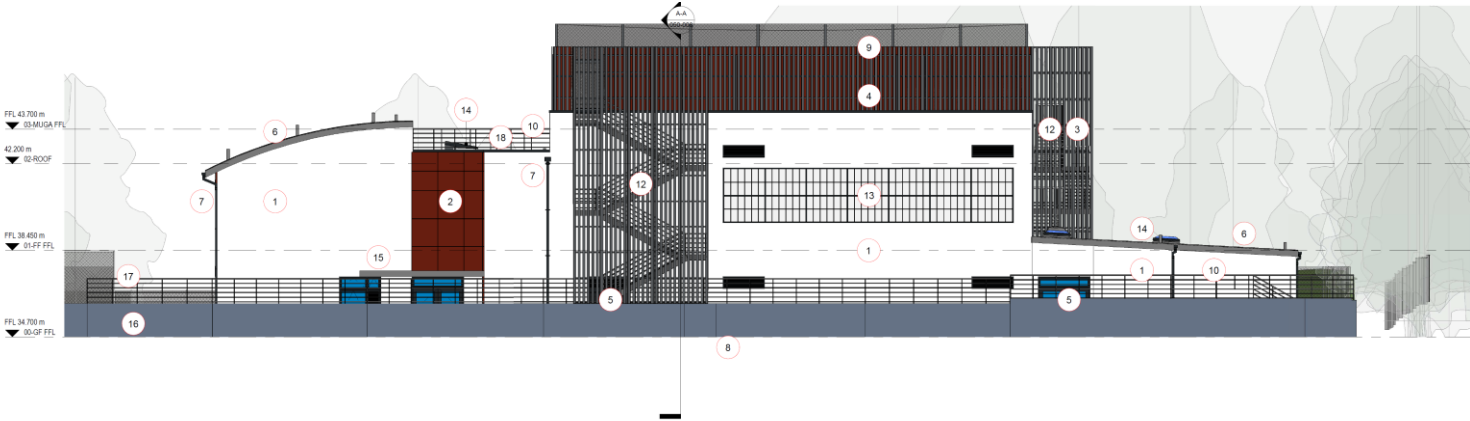
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**Proposed Elevations**



**West Elevation**



**1 True Site South Elevation**  
1:100



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**Proposed Visualisation Images**



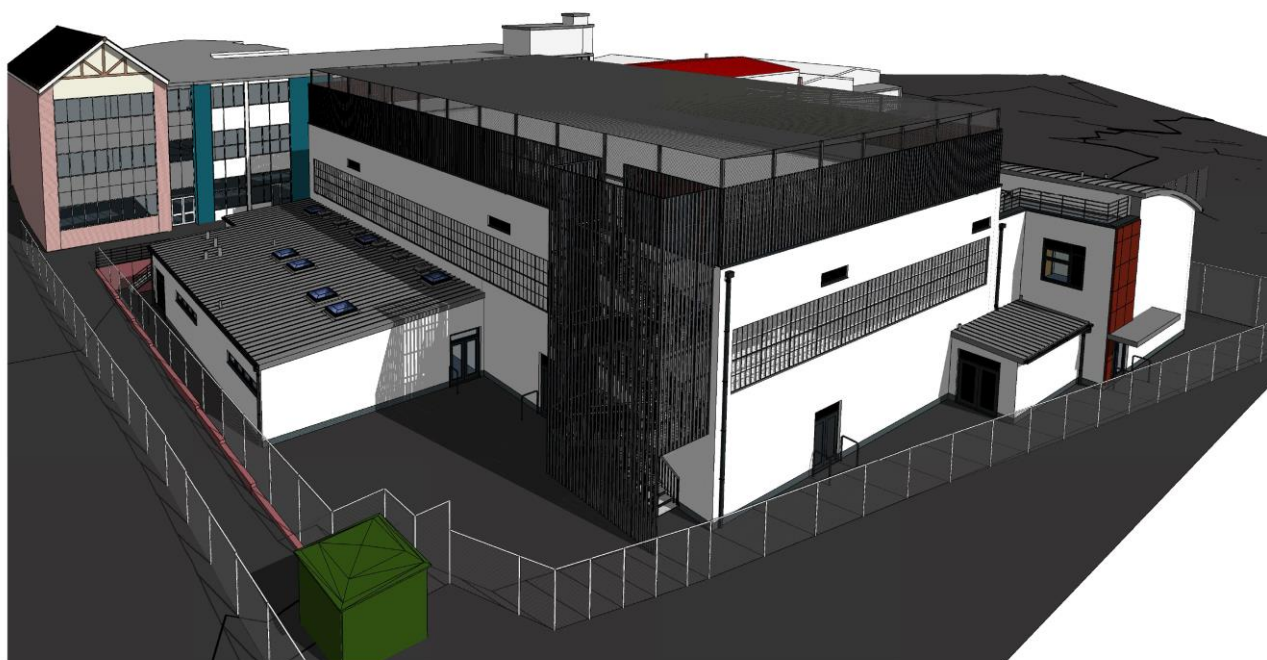
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East Aerial View





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3. The area to the rear of the school buildings on the northern side is well treed and screened from wider views, and Oakfield Lane runs along the rear of the site. To the front of the school buildings is an area of parking, and the site is enclosed along the road frontage with green roll top metal fencing, with some established hedging in places, and mature trees surrounding the built form. At the western end of the school site is a narrow lane which provides access to a scattering of residential properties. Parsons Lane is accessed from Common Lane at its western end and runs eastwards until its junction with Oakfield Lane at the other end. At the Common Lane end of Parsons Lane, traffic is two way. Outside the main entrance to the school, the road is 'traffic calmed' and at this point the road effectively becomes one way, allowing traffic to travel from west to east only, with no access back past this pinch point towards Common Lane, and no entry to Parsons Lane from Oakfield Lane either. There are zig-zag 'keep clear' markings outside the school entrance on both sides of the lane, with 'on road' bus stops marked along the remainder of the open frontage of the school.
4. WGSG is located in close proximity to a number of other education facilities. Wilmington Day Nursery and Pre-School, Wilmington Academy, Wilmington Grammar School for Boys and Wilmington Primary School are all located to the south of WGSG and accessed from Common Lane. The Girls Grammar School have use of a playing field located within the grounds of Wilmington Academy and the Boys Grammar School. Further to the east of the Academy site lies Wilmington Primary School, accessed via Common Lane.
5. 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.

**Background**

6. 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 school places for children at each school. The temporary accommodation was given approval, but the permanent buildings were subsequently withdrawn after a lengthy consultation period highlighted major concerns by those living in the locality that the village of Wilmington was struggling to cope with the amount of school related traffic. Further consultations between the applicants, planning officers and representatives of the Parish Council, Dartford Borough Council, Wilmington Safer Streets and Ward Members took place, and discussions followed about the raft of highway mitigation measures that would be necessary to make the expansions of the two schools acceptable. This application, and the similar application for Wilmington Academy (DA/0353/2017), are the result of these discussions.

**Recent Site History**

7. There have been a number of planning applications at the Grammar School site determined by Kent County Council and more recently by Dartford Borough Council, since the school took on academy status in 2011.

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Application Reference	Description	Decision
DA/02/1010	Erection of 2 no. prefabricated classroom buildings – single storey	Approved 12/12/2002
DA/03/293	Renewal of temporary permission for 2 no. mobile classroom buildings which were the subject of two separate applications DA/93/394 and DA/94/292	Approved 18/06/2003
DA/03/628	Erection of a single storey permanent modular building as a Mathematics Centre	Approved 09/09/2003
DA/05/929	Erection of new 4 classroom teaching block together with new lift, toilets and ancillary accommodation, together with alterations to the existing external escape stair and associated external works	Approved 13/12/2005
DA/06/330	Erection of new 8 classroom teaching block, together with seminar room, new lift, toilets and ancillary accommodation, along with a pitched roof to existing school building	Approved 01/06/2006
DA/07/1120	Formation of two pedestrian entrances, pupil waiting area and car parking modifications (including extension of existing car park at the north-west corner of the Grange) associated with the school travel plan.	Approved 17/01/2008
DA/08/883	Erection of aluminium solar shading to three storeys, to the south facade of the main teaching block.	Approved 22/07/2008
DA/16/00800	Relocation of an existing temporary classroom to the front of the school from the rear.	Approved 16/09/2016
DA/16/929	Erection of a two storey teaching block, rearrangement of the existing hard surfaced games courts together with associated landscaping and ancillary works	Withdrawn July 2017

Applications approved by Dartford Borough Council

Application Reference	Description	Decision
12/00616/FUL	Removal of existing panelling and windows and provision of replacement windows system and new cladding	Approved 26/07/2012
14/00709/FUL	Demolition of existing music block, removal of mobile classrooms and erection of three storey music and teaching block and extension of existing car park with associated landscaping	Approved 12/08/2014
14/01707/FUL	Erection of new sports hall	Approved 05/06/2015
15/01202/COU	Change of use of abandoned building in school grounds to Use Class D1 (education)	Approved 24/09/2015

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**Proposal**

8. As amended the planning application seeks approval for a two storey teaching block to be constructed at the rear of the existing school buildings which lie on the northern side of Parsons Lane, following the removal of the temporary classrooms situated here. The building would be sited at the eastern end of the school site, between the existing school and the northern boundary with Oakfield Lane. The building would accommodate a new 4 court sports hall which would form the central part of the footprint, with a single storey changing facility area to the east and a two storey classroom element to the west. Staircases would be provided internally at both ends of the classroom element, which would accommodate 5 classrooms, a tech room, various group rooms, offices and a viewing gallery for the sports hall at the first floor level. In addition to this, the proposal is for a new MUGA to be provided on the roof of the sports hall, accessed by two external staircases, one at the south-west corner and the other at the north-east corner. The MUGA would be enclosed by 3m high cladding and topped with ball stop netting to a maximum height of 4m (i.e. 1m above the top of the cladding).
9. There is a change in levels between the main school building and the existing ball courts and therefore the proposed new classroom block would sit within this lower terrace at a level 1.4m lower than the rest of the school. The maximum height of the new block is 13.6m above the existing ground level and consequently 3.23m below the existing teaching block ridge level. The cladding and ball stop netting would sit above this height, bringing it up to the same approximate level of the existing school. The siting of the building in this location would require the removal of four trees along the northern boundary, two turkey oaks, a holly tree and a pine, but the remainder of this scrubland and tree boundary would be retained and the site would remain enclosed by the existing chain link fence, which runs to the east and north of the site.
10. The extension would be predominantly white rendered, with elements of steel-grey and wine-red panelling to highlight sections and provide interest and detail. The classroom windows would follow a uniform pattern and would be dark grey aluminium to match the rainwater goods. There would be translucent wall panels on the north, south and east elevations to provide light to the sports hall and high level windows for the changing rooms. The classroom block would have a curved standing seam roof and the changing block a flat zinc roof. The external staircases would be enclosed by trespa cladding and the MUGA would be enclosed by 3m high hit and miss trespa cladding in steel grey and wine red. The ball stop netting would be supported by steel posts. Two of the four existing ground level ball courts would be retained here, following the proposed extension.
11. Because the proposed classroom block now includes a new sports hall, the School would not need to build the sports facility that was previously given approval in 2015 on the land to the south of Parsons Lane adjacent to The Manor. As such this land is now proposed to be used for a coach drop off loop. 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), and an additional 12 car parking spaces for staff would be provided at the very eastern end of the turning point. A 1.8m wide footway would be provided on either side of the



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bus/coach drop off bays tying in with the existing footways on Parsons Lane and the proposed new footpath link (see below). Acoustic fencing would be erected round the edge of the parking area and coach loop where this would abut the rear gardens of houses to the south. The inclusion of this fencing in the application and the increase in parking spaces from 6 to 12 formed amendments to the application, submitted in May 2018, along with updated Planning Statement, Design and Access Statement, Ecological Appraisal, Arboricultural Impact Assessment, Travel Plan, Technical Highways Note forming part of the Transport Assessment, layout plans and a new Noise Impact Assessment.

12. 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 entrance. It is proposed as part of this application to enhance this footpath to provide a direct route from the proposed new coach drop off to the Boys Grammar School on Common Lane, as an alternative to walking down Common Lane itself. The existing vehicular access on the northern side of Parsons Lane into the school site in front of The Grange would be retained and this leads to one area of existing on site parking provision for staff. There is an additional access lane to the very west of the school site which provides access to a parking area at the rear of the school site, and this would be the road utilised for construction traffic. This lane is also shared with residential properties which lie to the west of the school site.
13. The extension would facilitate the expansion of the school from a 4FE to a 5FE school. The expansion would relate to years 7-11 only, offering 750 places across those 5 years (150 per year), with additional spaces for those accommodated in the 6<sup>th</sup> form run by the Grammar School. There would be an associated increase in staff numbers from 84 to 89 staff.
14. The application is supported by a Design and Access Statement, Planning Statement, School Travel Plan, Transport Assessment, Construction Access Phasing Statement, Arboricultural Report, Arboricultural Impact Assessment, Tree Survey Plans, Preliminary Ecological Appraisal Survey, Flood Risk Assessment and Archaeological Desk Based Assessment, Building Physics and Part L Compliance Report, Ground Investigation Report, Phase 1 Ground Contamination Desk Study, and Noise Impact Assessment.

**Highway Mitigation Measures**

15. A number of mitigation measures are proposed to support this planning application and the simultaneous application for the proposed expansion at Wilmington Academy. 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.

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- Parsons lane Bus Drop Off Area – A dedicated bus drop off and turning area, as described in paragraph 10, would be provided.
  - 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 Girls Grammar School 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 – Proposed single-yellow lines 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 to 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 Loop to Boys Grammar – A footpath to link the proposed bus loop at the Girls Grammar School to the Boys Grammar School, as set out in paragraph 11 above.
  - 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 be subject to a separate planning application).
16. A number of mitigation measures have already been carried out as a result of the temporary permission granted last year which include the widening of the footway to the north of Common Lane and the provision of concrete bollards at the junction between Parsons Lane and Common Lane. The Public Right of Way (PROW) DR118A (to the north of the Academy onto Common Lane) has also been improved and a new path routing off this PROW has also been put in place to link this to the Academy without needing to walk along Common Lane. A bus pick up/drop off loop has been put in place within the Academy site to aid the congestion along Common Lane.
17. 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.

**Planning Policy**

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

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

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

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

- achieving the requirement for high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
- consideration of whether the opportunities for sustainable transport have been taken up and safe and suitable access to the site can be achieved for all people;
- 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 5<sup>th</sup> 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



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choice of school places to meet the needs of existing and new communities.

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

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

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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.
- 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,

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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.

- 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



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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 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**

19. **Dartford Borough Council**, in response to the original submission, have submitted a detailed objection to the application (received 12<sup>th</sup> March). They consider the proposal would be inappropriate development in the Green Belt and result 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 area which cannot be outweighed by the 'very special circumstances' which have been put forward as part of the current application. The proposal, they state, would therefore be contrary to Policies CS1, CS13, CS15, DP1, DP2, DP3, DP4, DP5, DP21 and DP22 of the adopted Local Plan for Dartford.

**Dartford Borough Council**, in response to the revised submission, provide the following comments:

"I refer to the above revised application which has now been re-considered by the Borough Council and wish to thank you for the opportunity to comment thereto. 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 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 north of the existing school building, creating a 3-storey building on currently existing playing courts. Immediately to the north of the site is Dartford Heath common land forming part of the Green Belt character in this area. A visual impact assessment has still not been provided by the developer but the Council consider that, what is effectively a three-storey building, is likely to be visible from Common Land (particularly as trees are being removed) and will also be visible on longer views from the north over the heathland. The school development will therefore in the Council's opinion be more prominent in the area, and will result in

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buildings on what is currently an open area and hard surfacing and roads on area which is not built on and therefore will in the Council's opinion impact on the openness of the Green Belt. The Borough Council consider 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 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 have 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 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.

*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 result 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 applications dismiss the traffic impacts of the proposal, 83 additional trips in the morning peak and 78 additional trips in the evening peak are anticipated arising from the development. The Council considers that given the rural nature of the surrounding roads and the narrow width of footways resulting in conflict between cars, buses, coaches, cyclists and pedestrians already in the surrounding area the increased in activity will result in additional harm to road users, pedestrian, cyclists and local residents.

The off-site mitigation measures proposed are 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

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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.

With regard to the noise assessment the Council's environmental health officers confirm that this is appropriate and have no concerns to raise.

With regard to visual impact the Borough Council would request that the County Council request verified views to the proposed extension from the north. Trees to the north of the site are proposed to be removed and others to have works to reduce their canopies. The trees former a buffer between Oakfield Lane and the school grounds and contribute to the creation of a rural heathland feel along Oakfield Lane and from views to the north. The Council is keen to ensure that the proposal for a three-storey building does not impact on the visual character of the area. The Council would also suggest that KCC impose a condition preventing external illumination should they be minded to grant planning permission in the interests of the openness of the Green Belt and also biodiversity impact.

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.

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 emphasises 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, in response to the original submission, raise strong objection to this application (and the other application currently being considered by the County Council for the expansion of Wilmington Academy) and comment as follows:**

“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.

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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.

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

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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."

In response to the amended details submitted **Wilmington Parish Council** have commented:

"The Parish Council notes the additional parking provision, which is most welcomed and in conjunction with the other mitigations proposed helps meet many of the concerns raised by residents in respect of parking and highway issues. However the Council is still of the opinion that the revised plans for the expansion of both WGSG and Wilmington Academy (KCC/DA/0353/2017) are contrary to Dartford Borough Council's Development Plan adopted in July 2017. Policy DP3 ('Transport Impact of Development') as detailed in the objection made when the original applications for the expansion of both sites went to consultation earlier in the year.

The Parish Council notes the view that the provision of an additional Form of Entry outweighs Green Belt considerations but must firstly make the point that Dartford Borough Council's Local Plan places great emphasis on the protection of the Green Belt. The Council believes that the views put forward at Paragraph 6.4.4 of the submitted Planning Statement are somewhat spurious in that –

1. Residents of the Parish should not be made to suffer by what is an inappropriate development; the fact that KCC 'would not be able to meet its statutory duty' of providing sufficient schoolplaces is not considered to be a reason for removing valuable green space
2. Holding 'local families' to ransom by warning that 'their children having to travel much further to school' is immaterial as this would be the case if an expansion had not been proposed
3. The contentions made regarding the 'deficit' and 'larger cohorts' is a matter that the Local Education Committee should have been previously considered and this shortcoming should not ride roughshod over the need to protect the Green Belt; and
4. The threat that the 'highway mitigations' would not be undertaken is regretted as it would seem to be a form of unacceptable coercion

The Council is therefore of the opinion that the reasons given within the Planning



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Statement do not outweigh the Green Belt considerations since this is regarded as an essential characteristic of the Borough and that the expansion would be to the detriment of the established local community.”

**Kent County Council Highways and Transportation** have commented in detail regarding both this application and the application at Wilmington Academy (item D5 on this agenda). Given the depth of the response and the complicated nature of the situation in Wilmington the response has been included in full at Appendix A. In summary no objection is raised to the development subject to the on and off site mitigation measures being provided in accordance with the plans submitted, and that the School provide and implement a robust School Travel Plan (STP) to include a range of road safety awareness, responsible parking and sustainable travel initiatives. Given the importance of the STP a Memorandum of Understanding is required to ensure the payment of a sum of £5,000 to ensure the Plan has adequate auditing, oversight and ongoing staff resourcing support from KCC Highways and Transportation. This fee would cover both the Grammar School Travel Plan and the Academy Travel Plan.

**The County Council’s Biodiversity Officer** has considered the revised Ecological Appraisal and raises no objection to the application subject to conditions relating to mitigation and ecological enhancements.

**The County Council’s Archaeologist** no comments received to date.

**Sport England** raise no objection to the application, noting that whilst part of an existing MUGA would be lost there would be adequate reprovision of sporting facilities on site.

**Environment Agency (Kent Area)** raise no objection subject to the imposition of conditions regarding the use of piling foundation methods without the express consent of the County Planning Authority; contamination not previously identified being found; and the infiltration of surface water drainage into the ground without the express consent of the County Planning Authority.

**KCC School Travel Plan Officer** is happy to accept the School Travel Plan as submitted, provided it is conditioned to be reviewed on an annual basis.

**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 Academy (KCC/DA/0353/2017):

“Proposed Mitigation

- Amendment to build out Parsons Lane - *WSS support this action*

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- 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*
- 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*
- Implemented Mitigation

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

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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 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**

20. The local County Member, Mrs Ann Allen, was notified of the application on 23<sup>rd</sup> January 2018 and the amended details on 25<sup>th</sup> May 2018.
21. 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 25<sup>th</sup> January 2018 and the amended details on 25<sup>th</sup> May 2018.
22. The County Member and the two Borough Councillors raise objection to this application and the accompanying application at Wilmington Academy (KCC/DA/0353/2017) and comment as follows:

“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.

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

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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.”

23. In response to the consultation for the amended plans and documents Councillors Eddy Lampkin, Derek Hunnisett and Ann Allen commented as follows:

“To save repetition we would refer you to the Parish Council reply in respect of this application to which we wish to confirm our full support to the concerns expressed. We are similarly pleased to note the improvement in on-site parking provided. We therefore ask that our support to the concerns raised by Wilmington Parish Council be noted.”

**Publicity**

24. The application was publicised by the posting of 3 site notices, an advertisement in the local newspaper, and the individual notification of 32 neighbouring properties and and/or individuals that submitted written representations on the previously withdrawn planning application (DA/16/929 (KCC/DA/0090/2016)).

**Representations**

25. In response to the publicity 37 letters of representation have been received from 31 local addresses. There were 3 letters of support and the other 34 all raised objections. Due to the fact the Academy application was submitted at the same time as the Girls Grammar School application (and the proposed expansions for these schools have a joint impact on the wider area), the majority of the comments received were directed at both planning applications.
26. The key points raised by local residents with regard to this application are summarised as follows:

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;
- 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;



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- 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;
- All the proposed improvements would benefit car drivers not children walking or cycling to school;
- 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;
- The bus drop off loop would result in the loss of the informal parking that currently occurs here providing approximately 15 spaces, therefore overall situation would be worse;
- 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;
- 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;
- The Transport Assessment refers to data collected in 2016, and in June which is exam time, so is out of date and inaccurate;
- 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;
- The roads would not be able to cope with construction vehicles;

Other Matters

- Overdevelopment of the site meaning a lack of space for children at recreation times;

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- Classroom block will be a dominant structure, out of keeping with the other school buildings;
- Concerned about potential felling of more trees;
- Do not want the sports hall to have any public use;
- 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 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;
- 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.

Support

- 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;
- Believe the proposal offers the best solution available within the confines of the location.

In response to the re-consultation an additional 4 letters of representation were received and the key points raised are summarised below:

- Local infrastructure is not adequate to support the existing pupils at Wilmington Grammar School for Girls and other nearby schools, let alone expansion at this school, especially in the context of concurrent expansion plans at the Academy;
- The local roads are impassable during school drop off and pick up times and the number of cars parked on the roads is dangerous;
- The new plans make some positive promises but they are little more than good

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intentions;

- The expansions mean more cars, more buses, more coaches more construction traffic, more builders cars etc.;
- No reason for granting a coach park on green belt land;
- The access off Parsons Lane for the coach park is unsuitable for such a purpose;
- Impact on wildlife in the area;
- A new school in a better location is required rather than extending the existing school in Wilmington.

**Discussion**

27. In considering this proposal regard must be had to the Development Plan Policies outlined in paragraph 18 above. Section 38(6) of the Planning and Compulsory Purchase Act (2004) states that applications must be determined in accordance with the Development Plan, unless material considerations indicate otherwise. Therefore the proposal needs to be considered in the context of the Development Plan Policies, Government Guidance and other material planning considerations arising from consultation and publicity.
28. This application is being reported for determination by the Planning Applications Committee due to the objections and views raised by the District Authority, Parish Council, Ward Members and the neighbour representations received. In my opinion, the key material planning considerations in this particular case are the principle of development in this location in relation to the Green Belt and the need for school places; the siting and design of the proposed extension in terms of its built form; the highway and traffic implications of the school expansion on the surrounding roads and the cumulative impact of this expansion and that proposed at Wilmington Academy. Other matters such as biodiversity, surface water drainage and sustainability will also be covered in the report.

**Principle of Development**

29. The school site lies within the Green Belt, where Policy DP22 of the Dartford Development Plan states that inappropriate development will only be approved by Very Special Circumstances and Policy CS13 of the Core Strategy states that inappropriate development will be resisted through development control decisions. The aims of the Dartford Green Belt policies reflect the guidance in the NPPF (paragraph 87) which states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in Very Special Circumstances (VSC). The NPPF advice, which is echoed at the local level, is 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.
30. Paragraph 89 of the NPPF states that Planning Authorities should consider the construction of new buildings as inappropriate in the Green Belt, but provides a number of exceptions where development may be acceptable. It is considered that the most pertinent exceptions applicable to this scheme are:

- (3) the extension or alteration of a building provided that it does not result in

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disproportionate additions over and above the size of the original building”.

- (6) limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land) whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

Policy DP22 of the Dartford Development Plan reiterates the exceptions of the NPPF and also states that where proposals for infilling or redevelopment of previously developed sites are being considered, those that meet the following criteria would be permitted:

- (a) proposals should not have a greater impact on the openness of the Green Belt, and the purpose of including land within it, than the existing development. Developments that lead to over-intensification of the site will not be permitted.

31. In my opinion the school has already benefited from various extensions, including a two storey extension to the front of the school, and therefore this proposed extension in combination with those already permitted would be considered as disproportionate compared to the original building and would therefore not meet exception (3). Furthermore the amount of development being proposed, and its location on an open area would, in my view, also mean the application would not accord with exception (6) of the NPPF or Policy DP22 of the Development Plan. It must therefore be deemed as inappropriate development in the Green Belt and this view is reiterated by the comments received from Dartford Borough Council.

32. It therefore needs to be considered whether there are any Very Special Circumstances which exist, which would allow for the setting aside of the general policies of restraint in the Green Belt. The application is supported by a Planning Statement where the applicants have set out what they consider the Very Special Circumstances to be.

Very Special Circumstances

33. The argument put forward by the applicants has a three-fold approach – the need for the development, the lack of alternatives, and the minimum required. The need for the development centres on the educational need, backed up the Government’s aims that there should be a sufficient choice of local school places to meet the needs of existing and new communities. The Educational Need has been outlined by the KCC Area Education Officer for North Kent, who states that the Wilmington and South Dartford urban areas have been seeing an upsurge in demand for secondary school places. The indigenous demand has been created by changing demographics in the area, and this has been combined with demand from the large and medium scale housing development in the area. The deficit of secondary school places in the Dartford Urban Area was forecast to be from 2018, but the unexpected closure of Hextable Oasis Academy (which was outside the control of KCC) meant the need for additional places arose in 2015.

34. The additional need for secondary school places has been mitigated in the short and medium term by the introduction of just under 8 forms of entry across the District. These

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have occurred at:

- (1) Dartford Grammar School for Girls – bulge intake of 20 additional pupils per year;
- (2) Leigh UTC – new 4FE school
- (3) Wilmington Grammar School for Girls – 1FE uplift
- (4) Wilmington Academy – 2FE uplift

However, even with the expansions having been undertaken, the Area Education Officer states that there is still barely sufficient capacity, and this creates no scope for parental choice or preference.

- 35. The 2018–2022 Kent Commissioning Plan provided forecasts that indicated an increase in the demand for secondary school capacity. Furthermore, this increased demand showed no signs of reducing over the forecast period. The surplus/deficit of places for both year 7 and for all year groups is below.

Figure 1

	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

However, these forecasts only include limited moderation to take into account the new housebuilding that is taking place in Dartford Borough. Much of the demand from these developments will be met by a new school in Ebbsfleet, in northern Dartford. However, the demand shown in Figure 1 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.

- 36. The Grammar School has been submitting increased cohorts since 2016 on a temporary basis, and forecasts for the Borough of Dartford support the view that without this permanent expansion the Borough would fail to meet its statutory obligations to provide sufficient school places in the area. This school expansion is one of a number that are necessary for the Dartford Area, and if it does not proceed the deficit of places will worsen because of the limited options for alternative expansions in the Dartford Area. Furthermore, recognition must be given to the fact that Kent is a Local Authority with a selective education system, and when providing additional places in Secondary Schools, commissioners need to be mindful of the need to maintain the proportionality between selective and non-selective school places where possible.
- 37. It must therefore be noted that the projected deficits in Secondary School places have been calculated with the 1FE expansion to Wilmington Grammar School for Girls already included within the capacity figure shown in the second column of Fig.1. This means that if the expansion planning is refused, 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 Figure 2:



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Figure 2

	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	-49	-71	-137	-210	-216	1,735
Year 7-11	7,913	362	216	50	-169	-551	-906	8,735

38. Wilmington Grammar School for Girls has been targeted for expansion due to the increased demand in Dartford Town and surrounding areas, meaning there is very little choice for parents; that the school sits very close to the area of greatest need; the size of the existing school being adequate to support the expansion; and it having a good Ofsted rating and support from the governors and head teacher.
39. In terms of the lack of alternatives the applicants acknowledge that it would be preferable to locate new development outside of the Green Belt from a planning policy stance, but as the whole site at the Grammar School falls within the Green Belt this could only be achieved by relocating elsewhere within the Borough. A number of alternative options were considered to accommodate the demand for school places, including the former Hextable school site. This site was discounted because the Swanley/Hextable area is amply served by the Orchard Academy, therefore it wouldn't serve the area of most need. It would require children to travel further to attend the school, and given that the most expedient route to Hextable from Dartford runs through Wilmington, would exacerbate the travel issues experienced here as well as in Heath Side and Joydens Wood. Furthermore the accommodation on this site is very dated and would have required a significant investment, making it less viable and cost effective than the current proposals. It should also be noted that even if the former Hextable site could be used, or an alternative new site found to operate a new school, Government legislation only allows for the opening of a new Free School on the site. To establish a new free school is a lengthy process and as the demand is critical there would not be sufficient time to set up such a school to meet the existing need.
40. The Council have two new 8FE schools due to be constructed within the next 3-4 years at Stone Lodge and Alkerden (Ebbsfleet Garden City) but again neither are due to be in place to meet the current demand. Given the lack of an acceptable alternative that can be provided to meet the existing shortfall problems, the proposals at Wilmington Grammar School for Girls are considered by the applicants as the optimal solution.
41. The applicants have stated that if the application were not approved, and the School reverted to a 4FE School, there would be a number of implications. Firstly for the short to medium term the County Council would not be able to meet its statutory duty of providing a school place for every young person in the area; secondly 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. By 2019 there would be a deficit of more than 3FE of secondary provision and this could not be covered by introducing bulge years in existing schools, and WGSG would be left with much large cohorts in 4 of its year groups with insufficient and inadequate accommodation to enable the school to provide the best educational opportunities for the students. Finally the planned highway mitigations that are incorporated into this scheme and which have been designed as part of the two applications at WGSG and Wilmington Academy would

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not be undertaken to the detriment of the existing situation.

42. The third string of the argument put forward is that the scheme represents the minimum amount of development required. The existing buildings fall short of the amount of space required for a 5FE secondary school, and therefore careful consideration has been given to accommodating an additional form of entry on site. The applicants state that the minimum amount of space has been proposed in the new building, combined with consideration of internal alterations to enable the scheme to accord with Building Bulletin for Schools 103, and that the new block has been designed to respond to the existing buildings and external spaces on site.
43. The proposed development involves not only the new building to the north of Parsons Lane, but also the coach drop off loop and parking facilities to the south of the road. In terms of the appropriateness of this part of the development in terms of Green Belt policy, it should be noted that under the NPPF exceptions, the provision of local transport infrastructure that requires a Green Belt location are not considered inappropriate provided they preserve the openness of the Green Belt. Given that the school falls within the Green Belt and that the coach and parking facilities are required to serve the school development, it is considered that this part of the scheme would accord with the exceptions. The hardsurfacing required to form the coach loop and parking would all be provided at ground level and I can see no reason why this would affect the openness of the Green Belt. Notwithstanding this view, the coach loop forms part of a comprehensive package of highway mitigation measures (which are discussed in detail later in this report) which would be integral to the provision of the additional form of entry at the school. It could also be argued that the Very Special Circumstances outlined earlier about the need for the school places at WGSG would also apply to this element of the proposal.
44. Finally, and to consider the impact on the Green Belt as a whole, the application needs to be considered in terms of the impact of the development on the openness of the Green Belt. 'Openness' has been described as an 'absence of development' irrespective of the degree of visibility of the land in question from public vantage points. Therefore, any development will have an impact on openness and the degree to which that impact is either acceptable or unacceptable will be a matter of fact and degree based on the merits of each case. Local Plan Policy DP22 sets out what is considered to amount to other harm in the Green Belt and, in relation to openness, this includes the extent of intensification of the use of the site, and the impact on visual amenity or character taking into account the extent of screening required.
45. Given the description of openness above, it must be accepted that should permission be given there will some impact on the openness of the green belt. However, the new classroom block would be sited in close proximity to the existing three storey building on the northern side of Parsons Lane and the development would be seen within the context of this and the other school buildings on site. This would, in my view, reduce the impact on the extension in visual terms, and limit the effect on the 'openness' of the Green Belt. The proposed block would have a compact footprint which would avoid spreading the development across the site and would consolidate the built form in one place. Whilst the development would 'intensify' the use of the site through the 1FE expansion, it should be noted that this is an existing education facility and the uplift in pupil numbers has been taking place since 2016, with students currently taught in

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mobile classrooms to address the shortfall in space on site. In my view, the intensification of the built form on site would not be to such a degree that a refusal of the scheme would be warranted.

46. Due to the compact and innovative design of the classroom block, with the sports hall included and the MUGA on the roof, the school would not need to construct the sports hall that was given permission by Dartford Borough Council in 2014. This was due to be sited on the southern side of Parsons Lane in the location of the proposed coach loop and parking spaces. This building was justified by DBC as development in the Green belt against their own planning policies and the NPPF, yet would have resulted in development being intensified on the southern side of Parsons Lane. By incorporating the sports hall into the current proposals, the need to build the separate sports hall is removed. In this way the built form could be contained amongst the other classroom buildings, and the land south of Parsons Lane used for the added benefit of providing highway mitigation works, which would have a limited impact on the openness of the Green Belt.
47. As noted earlier, Dartford Borough Council have raised an objection to the application on the grounds that it would represent inappropriate development in the Green Belt, but they state that it would be for the County Council to decide if the Very Special Circumstances put forward in terms of the need for secondary school places, outweighed this harm. Furthermore on green belt grounds they have concerns that the proposal would result in an intensification of the use of the site and adjacent land, reducing the area of the site that is open. The guidance is conflicting in that on one hand the NPPF (backed up by local Policies) seeks for the green belt to be protected, yet on the other that great weight needs to be given to the need to create, expand and alter schools. Where the two elements overlap, as in this case, a balancing exercise has to be undertaken.
48. Overall, and taking on board the views of the District Council, I accept the applicant's assessment and application of Green Belt Policy as set out in the submitted documentation, and I have considered this in the context of the Development Plan Policies and the NPPF. The development is inappropriate development for the purposes of Green Belt Policy consideration and is, therefore, by definition harmful to the Green Belt. Nevertheless, in my view, the considerations summarised above are sufficient collectively to constitute 'Very Special Circumstances' capable of outweighing harm, in this particular case. I accept that the carefully designed extension and its siting in relation to the existing school, plus the removal of the need to construct the permitted sports hall on the southern side of Parsons Lane would mitigate the impact of the development on the functioning and openness of the Green Belt. Accordingly, I consider that an objection on Green Belt grounds would not be warranted in this particular case. However, if Members were minded to grant permission, the application would need to be referred to the Secretary of State for Communities and Local Government before permission could be granted, to enable him to adjudicate on the Green Belt ramifications of the proposed development.

**Siting and Design of the Extension**

49. The proposed addition to WGSG would be a modern building with a roughly square footprint providing a 4 court sports hall with associated changing facilities, 5 classrooms,

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a tech room, various group rooms, offices and a viewing gallery for the sports hall at the first floor level. In addition a roof top MUGA would be provided enclosed by 3m high cladding and topped with ball stop netting to a maximum height of 4m (i.e. 1m above the top of the cladding). The walls would be constructed from white render panels, with elements of steel grey and wine red panelling to highlight sections and provide interest and detail. The classrooms would be well lit by natural light through the dark grey aluminium framed windows and the sports hall would benefit from high level translucent wall panels. The classroom block would have a curved standing seam roof, and the changing block a flat zinc roof. The external staircases would be enclosed by trespa cladding and the MUGA would be enclosed by 3m high hit and miss trespa cladding in steel grey and wine red. The existing school buildings are varied in their architectural style and materials used, and it is considered that the proposed classroom block would pick up on some of the surrounding elements and materials, resulting in a building which would complement the site. Due to the ball court netting and panelling, the scheme would effectively be a three storey building, however, it is considered that the scale of the extension would not be out of place on site, and the lower ground floor level would help to soften the impact in terms of overall height. In addition, the hit and miss nature of the trespa panels and the ball court netting would have a more lightweight appearance and would lessen the impact of these elements, where views through the materials would be possible.

50. The extension would be located in the north-eastern corner of the site and would result in the loss of two of the existing four ball courts. The proposals, however, include a new 4 court indoor facility and the MUGA on the roof, and therefore in overall provision terms the School would still enjoy ample ball court space. Sport England were consulted on the application and have confirmed that as adequate re-provision of facilities would be made through the proposals, they have no objection to the development. In order to address the shortfall whilst construction takes place, the Phasing Statement submitted with the application confirms that a temporary ball court would be provided on the site of the coach loop and parking area whilst the building is being constructed.
51. The building would be tucked inside the existing chain link fence along the eastern boundary and would therefore not affect the boundary treatment along this side of the site, nor would it impact on the existing substation just outside the site in the north-eastern corner. Along the northern boundary four trees would be removed to accommodate the building, but the remainder of this scrubland and tree boundary would be retained. Beyond the northern boundary lies Oakfield Lane and beyond this the Heath, which is an open grassed area which sits between the Lane and the A2. Concern has been raised by Dartford Borough Council that the removal of the trees along this boundary and the siting and height of the classroom block would affect the visual character of the area, especially views from the Heath back towards the site. Although their comments are noted, in my opinion the proposed development would, if seen from the Heath, be viewed in the context of the existing three storey school building behind it and whilst it may be visible it would not be a new building in its own right, but part of an established education site. I would therefore consider any visual impact to be minimal on the wider landscape setting and therefore not harmful to any great extent. Landscape matters in general are covered later in the report.
52. Given the location of the building, tucked into this corner of the site, it would be some distance away from any neighbouring properties, therefore unlikely to cause any amenity

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issues for these residents. The closest properties to the classroom would be those sited to the west of the school, between the school boundary and Common Lane. The distances involved between these houses and the new development would be extensive and it is considered that the scheme would not unreasonably affect them. The only potential impact to these properties would be during the construction of the building where it is proposed for the construction traffic to enter the site via the lane to the west of the school which also serves these properties. The Construction and Phasing document submitted in support of the application states that the access road would be resurfaced and upgraded in order to withstand the weight of the construction traffic which would use the road for the duration of the project, and on completion of the works the road would be resurfaced with a wearing course of tarmac. In addition the document states that any damage caused to the existing surfaces during construction would be made good. It is therefore considered that although the residents might experience temporary disruption with contractors vehicles using this access, the road would be made good during and after the event, and in the long term there would be no lasting impact. A condition could be imposed to ensure compliance with the Phasing Document in this respect, as part of a Construction Management Plan.

53. The sports hall and roof top MUGA would be for the School use only. In determining the previous application for the sports hall to the south of Parsons Lane, Dartford Borough Council considered that the site would not have been able to provide the required amount of car parking to allow members of the community to use the facilities and this situation has not changed, therefore no community use is proposed as part of this application. The MUGA is not proposed to be lit and to protect the amenity of neighbouring properties and impact on the wider area it is considered that lighting would have been inappropriate in this instance. A condition which requires the School to apply for any lighting they may wish to install in the future has been proposed to enable the County Planning Authority to have control over this situation. A Noise Impact Assessment was submitted to accompany the application, which considered the impact of noise that might be generated by children using the roof top MUGA, and this demonstrated that there would be no significant impact on residential amenity. Dartford Borough Council have confirmed that they have no objection to the application in noise terms.
54. To the south of Parsons Lane, the application proposes the widening of the existing access next to The Manor (to 10.5m wide) and the creation of a new coach turning and drop of loop, plus an additional 12 staff car parking spaces. The coach parking spaces would be provided either side of a formal access road (3 on either side) and the additional 12 parking spaces would be accessed at the end of the turning loop, with 6 on each side. A footpath link would run along the edge of the coach bays and extend as far as the staff parking area on the southern side, to provide safe access from here to the school site for pedestrians. This element of the scheme will be addressed in detail in the following Highways and Traffic section of the report. In addition to the parking provided here, the amended scheme also includes acoustic fencing which would run around the perimeter of the site by the parking spaces and turning loop, where this meets the end of the residential gardens for houses to the south. It is considered that this fencing (which would be 2m high) would be sufficient to alleviate any disturbance which might be experienced through noise of cars and coaches parking and turning in this area for those living in these properties, especially as this area is right at the end of the gardens which are at least 60m long.

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55. The existing footpath which runs through the WGSG southern side of the site, linking Parsons Lane and Common Lane (by the entrance to the Boys Grammar School) would be cleared and where necessary enhanced to make a safe route through from one road to another, as an alternative to having to walk along the pavements of these two roads. Again more detailed comment on this element will follow, but in terms of overall layout it is considered that this would be acceptable and beneficial to the site as a whole.
56. It is therefore considered that from a design and siting point of view, and taking into consideration any possible impact on residential amenity from the works themselves, the scheme would be acceptable and in accordance with Policy DP2 of the Dartford Development Plan.

**Highway and Traffic Implications of the School Expansion**

57. 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 WGSG and Wilmington Academy 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 mitigation for the temporary expansion at Wilmington Academy. 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 schools and nearby properties have been required to cut back overhanging 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.
58. This sums up the situation as it stands at present, but the expansion of the Grammar School and the Academy will continue year on year until complete, and further works will be required to compensate for these pupils in highway terms should permission be given. Looking at The Grammar School as an individual site the following matters



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should be taken into account. The application was supported by the submission of a Transport Statement and the further submission of a Transport Statement Addendum in May 2018, and these are the documents considered by the Highways and Transportation Officer, alongside the proposed mitigation plan which formed part of these documents.

59. The Grammar School site only provides for staff parking on the site and this situation would not change under the current proposals. The existing parking arrangements on the northern part of the site would be retained as existing, whilst the informal parking area on the southern side of Parsons Lane would be remodelled to form the new coach drop off loop and at the end of this loop, 12 additional parking spaces would be provided for staff parking. The cars parked in this area are at present making use of a piece of land which is not designated for parking, and the applicants note that the parking here could have been extinguished at any time if the previously approved sports hall were to be constructed. Nevertheless, there would be a displacement of cars from this area - some would be owned by staff who could utilise the new 12 spaces, whilst those belonging to students would be forced to relocate to the road. As part of the STP it is intended that the School will discourage all students from driving to the school, to reduce this displacement as well as parking on surrounding roads in general. Parking is available along Parsons Lane outside of the marked bus bays and surveys undertaken by the applicants have shown that a number of spaces are generally free here to accommodate those who choose to ignore the advice not to drive. The Highways and Transportation Officer has confirmed that the number of additional spaces would comply with the Dartford Local Development Framework Parking Standards (2012) and would be acceptable in this regard, and proposes a condition be added to any consent to ensure these parking spaces are permanently retained.
60. The on road bus bays would be relocated slightly further along Parsons Lane as part of the off-site mitigation plans to allow for the widening of the access for the bus drop off loop. The bus loop, as described earlier in the report, would allow for the privately run coaches organised by parents of the Grammar School children to enter the site to drop the pupils off (onto pedestrian footpaths which run either side of the loop) and then turn within the site and exit back onto Parsons Lane. The widening of the access would allow the coaches to enter and leave without any conflict and there would be space within the site for 6 coaches to be accommodated at any one time, with 3 parked on each side of the central access road. The benefit of removing these coaches from Parsons Lane would allow other traffic to flow along the lane without being impeded by stationary coaches, and furthermore would allow the children to alight in a safe area away from the main road.
61. The works that are also proposed on this southern part of the site involve the improvement and maintenance of an existing footpath link which runs from this area down towards Common Lane. The footpath is in a reasonable state at present but works would be undertaken to ensure it is safe to use in all weather, and to extend the path across the grass at the southern end of the site and create a new gated entrance in the fence line to allow access onto Common Lane. This access point would link in with the existing zebra crossing outside the Boys Grammar School. This proposal is an important improvement in highway terms as it would allow all the grammar students (boys and girls) to walk between the 2 sites without having to walk along Common Lane, thus significantly improving safety. This would address a key concern raised by

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Highways and Transportation in 2016 that there should be no increase in the number of pupils using the footpath 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. It is important that this link be in place as early as possible and the applicants have stated that they would be able to provide this prior to construction starting for the new building, should permission be given. A condition to secure this is suggested.

62. As a result of the requirements for mitigation in the area for the combined impact of this development and that at the Academy, a number of off-site highway and transportation mitigation measures are proposed. 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;
  - 18 additional staff parking spaces within the Wilmington Academy car park;
  - 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;
  - proposed table top shared surface would be constructed at the point where Public Right of Way 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.
63. 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 Highways & Transportation to be sufficient to mitigate the impact of the proposed expansion of the Grammar School and the Academy in respect of new infrastructure. The works would need to be conditioned to ensure that they are provided in a reasonable timescale in relation to the School works, to ensure they are in place to mitigate for the additional pupils. With regard to the works along Parsons Lane, these would be undertaken in association with the construction of the coach loop (as the new raised table would need to link in with the revised access arrangements) and this part of the Grammar School proposals would be undertaken as the last phase of works once the new building is finished.
64. For all of the remaining off-site highway mitigation measures proposed, where they are on the public highway, they would 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 Highways and & Transportation, 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 extension at the school. Further, as required by the Highways Officer, an additional condition should be imposed requiring the provision of new poles and globes at the zebra crossing at the Academy/ WGSB exit on to Common

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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 would not be significantly exacerbated by this application to a level to warrant refusal of the application under policy guidance and the NPPF.

65. Alongside the physical mitigation an updated School Travel Plan has been produced and submitted for the Grammar School. The Travel Plan is put forward in the Transport assessment as a key element of the mitigation measures, particularly in terms of the junction assessments, where a 10% reduction in total school traffic flows (with trips transferring primarily to bus and coach journeys) is assumed to result from the successful implementation of the plan. The Highway Officer states that the School 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. Given the traffic pressures from parent parking on Parsons Lane, WGSG should consider participating in KCC's Responsible Parking Initiative at <http://www.responsibleparking.co.uk/>. The Travel Plan does commit WGSG to provide at least one member of staff to oversee traffic and pedestrian movements on Parsons Lane, and 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, especially the Academy in respect of enabling their students to access the Grammar School coach services, can be expanded upon given the need to take collective action to address common issues.
66. 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 School and Academy manage arrangements effectively on and off site, to help deliver the travel plan targets. It is accepted that this contribution can cover both the WGSG and the Academy 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.
67. 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 under policy guidance and the NPPF. The NPPF, the Policy Statement Planning for Schools

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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 these, I am satisfied that in this instance, 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.

**Other Matters**

**Construction**

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

**Biodiversity**

69. The application was supported by the submission of a Preliminary Ecological Appraisal (PEA) and following the consultation process with the County's Biodiversity Officer this document has been revised (June 2018) and supplemented with an additional Bat Emergence Survey report and additional photographic evidence of the footpath through the site. The report has carried out a survey of the land on the southern side of Parsons Lane which would be used for the coach park and turning loop to assess the potential for this area to support any protected species including reptiles, invertebrates, owls, breeding birds, bats, amphibians and any other terrestrial mammals. In respect of mammals, amphibians, owls and invertebrates no further survey work was found to be required. With regard to breeding birds it was noted that any clearance should be undertaken outside of the breeding bird season (1<sup>st</sup> March to 31<sup>st</sup> August) but that if this timeframe couldn't be avoided then inspection by a qualified ecologist should be undertaken before works commenced. This advice can be provided through an informative.
70. The proposals involve the removal of a scots pine tree (noted as T8 in the arboricultural report) which had suitable bat roosting features within it, and as such there was a need to undertake bat emergence surveys for consideration prior to the determination of the application. These have been undertaken and the results submitted (June 2018) and considered by the Biodiversity Officer, who concurs with the findings that no bats were seen to be roosting in the tree. However, because the tree does provide suitable bat

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roosting features, it needs to be removed under a precautionary approach, where it is cut down in sections (ensuring the woodpecker hole is within the middle of one section), then the tree left in situ for 24 hours after which time it can be disposed of. The trees to be removed on the northern part of the site (along Oakfield Lane) have not been surveyed for bats but do not appear to have any suitable features for roosting within them, and there would be sufficient space retained to mitigate any potential impacts. Given this the Biodiversity Officer suggests the imposition of a condition which would require the submission of a bat mitigation strategy to be submitted for written approval before the trees are removed. Finally, with regard to bats, it is advised that the applicants be made aware of the Bat Conservation Trusts guidance with regard to any new lighting on site that might have a negative effect on bats.

71. In terms of reptiles the PEA found that there should be a precautionary approach to clearing the vegetation within the car parking area and identified a location for a receptor site. The areas are not adjacent to each other therefore the reptiles cannot be “pushed” in to the receptor site, however as the area of vegetation to be lost is small and it is adjacent to retained areas of vegetation it is accepted that the approach suggested in the PEA is appropriate for this site. In addition to the methodology proposed the Biodiversity Officer advises that an ecologist must carry out a fingertip search within this area once the vegetation clearance has been carried out – this will enable any reptiles captured to be moved to the receptor site. Furthermore it is recommended that wood piles are created out of the felled trees to enhance the receptor site for reptiles. The habitat either side of the footpath through the site is also suitable for reptiles, therefore should the pathway need to be widened as part of the development the precautionary reptile mitigation in the PEA must also be implemented to minimise the risk to reptiles during construction works. The conditions requested by the Biodiversity Officer have been included within the recommendation.
72. Finally, the application provides opportunities for ecological enhancements to be incorporated on site and the report makes a number of recommendations which the Biodiversity Officer considers should be implemented if approved, and once again, these can be secured by condition. It is therefore considered that the scheme would comply with paragraphs 109 and 118 of the NPPF, Policy DP25 of the Dartford Development Policies Local Plan.

**Landscape**

73. The application was supported by the submission of an Arboricultural Report, Arboricultural Impact Assessment and Tree Survey Plans, which outlined the trees that would need to be removed from the site to accommodate the proposed development. On the northern side of Parsons Lane, where the new classroom block and sports hall would be built would require the removal of four trees along the northern boundary of the site with Oakfield Lane, which include two turkey oaks, a holly tree and a pine. The trees tend to form a continuous belt, with some instances of larger trees that are classified separately. Three of the trees are graded as category C (low quality trees which are considered as insignificant in terms of their amenity value) with the pine being graded as a B category tree. Whilst it would always be preferable to retain established and mature trees, it is considered that because of the way the trees here form a continuous belt, the removal of these four trees (none of which are grade A, nor prominent in their own setting) would have a limited impact on the wider appearance of

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the area. The remainder of the tree belt would be enclosed by tree protection fencing for the duration of the development and a condition can be imposed to require this. It is also considered necessary to require the applicant's to submit a construction method statement for works that would occur within the root protection areas of trees to be retained, and again this could be secured through a suitably worded condition.

74. On the southern side of Parsons Lane the development of the coach drop off loop and parking spaces would require the removal of six trees. Five of these are located close to the existing entrance to the site, whilst the 6<sup>th</sup> lies along the southern boundary of the site. The trees to be removed are a holly, yew, oak, scots pine, Atlantic cedar and a bay tree. This part of the development site is more wooded in appearance and with the exception of the bay, the groups of trees which surround the site away from the entrance would all be retained and protected by tree protection fencing. The Atlantic Cedar and the tall Scots Pine are considered to be good specimens in themselves, but the access to the coach park would not be possible without their removal. Given the importance of providing the highway mitigation measures discussed above to alleviate problems along Common Lane and Parsons Lane, it is considered that their loss would be justified as the scheme would have an overall benefit to the wider village of Wilmington
75. In order to compensate for the tree loss on both parts of the site, a condition is proposed requiring a landscape scheme to be submitted indicating the species and location of native tree planting elsewhere within the site, and the maintenance of these trees for a period of 5 years after planting. Subject to this, the tree protection condition and the method statement condition it is considered that the scheme would be acceptable overall in landscape terms and would accord with Policies DP2 and DP25 of the Dartford Development Policies Local Plan.

**Flood Risk & Drainage**

76. The application was supported by the submission of a Flood Risk Assessment which shows that the proposed extension falls within Flood Zone 1, the zone least vulnerable to flooding. As such it meets the aims of the sequential test by providing the development within an area with the lowest probability of flooding. In flood risk terms the proposal is therefore considered acceptable. Details of the proposed drainage were also included in the report and the County's Flood and Water Management Team have assessed these details. They state that they have no objection in principle to the application which proposed to use soakaways for surface water drainage, however further ground investigation would be necessary to confirm the design arrangements. Therefore, should permission be granted they have requested the imposition of conditions to secure the submission of a detailed sustainable surface water drainage scheme to be agreed in writing prior to development commencing; that the extension shall not be occupied until an operation and maintenance manual has been approved in writing; and that where infiltration is proposed this will only be permitted in an area which would not result in a risk to controlled waters.

**Contamination**

77. The Environment Agency were consulted on the application as the site is within Source Protection Zone 3 underlain by Secondary and Principal aquifers. The application was supported by the submission of a Ground Investigation Report and a Phase 1 Ground

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Contamination Desk Study. The Environment Agency state that they have no objection to the proposed development provided suitably worded conditions are added to any consent which restrict penetrative foundation designs to areas where there would be no risk to groundwater; a means of dealing with any contamination found on site that hadn't been previously identified; and that infiltration of surface water into the ground should only be permitted with the express consent of the County Planning Authority.

**Sustainability**

78. The applicant advises that sustainable design has been integrated into the building concept. An area on the roof plan (between the curved classroom roof and the fencing for the rooftop MUGA) has been identified for an array of photo-voltaic panels. 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.

**General Amenity and Other Matters**

79. 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 Girls Grammar School 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.
80. 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 Grammar School and places offered to pupils for September 2018, and 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.



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**Conclusion**

81. 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 and I consider that the development would not affect the openness 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.
82. In my view 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**

83. I RECOMMEND that the application BE REFERRED to the Secretary of State for Housing, Communities and Local Government 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 the imposition of conditions covering (amongst other matters) the following:
- the standard 5 year time limit for implementation;
  - the development to be carried out in accordance with the permitted details;
  - the 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;
  - that Tree T8 (Scots Pine) be cut down and removed in sections to protect the potential for bats to be roosting within it;
  - the submission of a bat mitigation strategy for written approval prior to the removal of any trees on site;

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- the development be carried out in accordance with the reptile mitigation strategy as set out in the PEA and that a fingertip search for reptiles be undertaken upon completion of the vegetation clearance;
- any widening of the footpath on site to be undertaken in accordance with the precautionary reptile mitigation strategy set out in the PEA;
- Completion of the on-site infrastructure (footpath link) shown on the submitted plan (drawing number 11231T-03) prior to the commencement of the construction works relating to the new building and its permanent retention thereafter;
- 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
- 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 permanent retention of the 6 coach bays and 12 parking spaces shown on the submitted plans within 6 months of the occupation of the building;
- access to be maintained to the drop off loops and bus parking areas within the school site;
- measures to prevent the discharge of surface water onto the highway;
- the submission of a fully detailed sustainable surface water drainage scheme for the site prior to commencement of development, and the written approval of such a scheme and its on-going maintenance prior to occupation of the extension;
- the submission and approval of a maintenance manual for the sustainable drainage scheme prior to occupation of the extension;
- no infiltration of surface water drainage into the ground other than with the approval of the County Planning Authority;
- if during development contamination not previously identified is found to be present, then no further development shall take place until a remediation strategy has been agreed with the Council;
- no piling or penetrative foundation methods be used on site without prior written consent of the County Planning Authority;
- 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, details of any construction accesses; hours of construction; and compliance with the Phasing Strategy;
- The rooftop MUGA shall not be lit without the prior written consent of the County Planning Authority.

## Item D6

### **New two storey teaching block and sports hall with rooftop MUGA, drop off loop for 6 buses and 12 parking spaces at Wilmington Grammar School for Girls, Parsons Lane, Wilmington – DA/18/94/CPO (KCC/DA/0002/2018)**

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

- Wilmington Grammar School for Girls 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 registering with Kent County Council of the School Travel Plan through the “Jambusters” website following the link <http://www.jambusterstpms.co.uk>
- To ensure that works to trees are carried out outside of the breeding bird season and if this is not possible that an ecologist examines the site prior to works commencing;
- That the applicants be aware of the Bat Conservation Trusts guidance with regard to lighting on site.

Case Officer: Helen Edwards

Tel. no: 03000 413366

Background Documents: See Section Heading

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**Appendix A**

Received - 26 June 2018  
Planning Applications Group



**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/0002/2018**

**Location - Wilmington Grammar School for Girls, Parsons Lane, Wilmington, Dartford, Kent, DA2 7BB**

**Proposal - Erection of a two storey teaching block and sports hall with roof top MUGA to accommodate an additional Form of Entry (4FE to 5FE); provision of a drop-off loop for 6 buses; 6 additional car park spaces; rearrangement of the existing hard surfaced games court together with a temporary games court during construction works, associated landscaping, upgraded footpath link and ancillary highways works**

Dear Helen

Thank you for asking for my views relating to the application for the expansion of Wilmington Grammar School for Girls (WGSG).

As highlighted in all KCC Highways responses to planning applications at the Wilmington schools (most recently in respect of Wilmington Academy) all of the expansions 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.

**Local Highway Network/ Travel Patterns**

The WGSG is accessed from Parsons Lane and Common Lane, both of which are unclassified roads with relatively narrow footways only to the north side for much of their lengths. The site is very close to Wilmington Academy, Wilmington Grammar School for Boys, Wilmington Primary School and Wilmington Day Nursery via 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. The footway on Parsons Lane is of similar 'below standard' dimensions and similarly suffers from overgrowing vegetation. 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

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footway when passing each other, sometimes in close proximity to pedestrians - the majority of whom are children and adolescents.

The main vehicle access to WGSG on Parsons Lane is gated and for staff only. There are separate gated access points for pedestrians to either side. Yellow zig zag school keep clear markings are provided on both sides of the carriageway near to the access.

The footway on Parsons Lane connects with footways on Common Lane and Oakfield Lane. Pedestrians are able to cross Oakfield Lane at a pelican crossing and Common Lane near to the Academy at a zebra crossing. Additionally, PROW footpath DR105 provides a poor-quality link between Parsons Lane and Common Lane and the newly improved DR118A links Common Lane through to Tredegar Road.

Parsons Lane has 3 bus/ coach bays to the east of the WGSG access and, by virtue of a prohibited entry from Oakfield Lane, it operates as 'one way only' for much of its length. There are also bus stops on Common Lane to the north of Parsons Lane where pupils from the Wilmington schools congregate on the narrow footway.

There are a number of school-only and local bus services in the area and WGSG also benefits from a number of private coach services which transport pupils to and from both Grammar schools. These vehicles follow a loop via Common Lane and the Wilmington Grammar School for Boys and then to WGSG and out to the north along Parsons Lane.

There is no provision on the WGSG site for pupil pick up and drop off. Instead this takes place along Parsons Lane and Common Lane. During school peak periods the local highway network is heavily congested and the footways are similarly full. 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 2016 asking pupils how they travelled to school which showed the following mode shares: walking: 37 (5%), car drop off/pick up: 210 (26%), car share/ lift with others: 47 (6%), bus: 330 (41%), coach: 168 (21%). No children were recorded as cycling. 804 pupils completed the survey which is a 92% response rate. Of staff journeys there were 74 (88%) travelling by car and 5 (6%) shared a car journey, 3 walked and 2 cycled. All staff completed the survey.

A further pupil travel survey was undertaken in 2018. This showed the following mode shares: walk: 31 (5%), car: 210 (30%), car share/ lift with others: 46 (7%), bus & coach: 406 (59%). 695 pupils completed the survey which is an 80% response rate.

**Road Safety**

Road casualty incidents have been investigated for a 3 year period to 31<sup>st</sup> 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

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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 at Wilmington Academy, as well as actions by the County Council and Dartford Borough 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,
- 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 WGSG be expanded to accommodate up to 150 additional pupils increasing the school roll from 871 to 1,021 and staff would consequently increase by 5 from 84 to 89. The mode share data from the 2016 travel survey has been used to



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derive both the current and the new total number of journeys on the highway network resulting from the school.

The current school total number of vehicle trips is estimated at 529 (302 arrivals, 228 departures) in the morning peak between 8am and 9am and 455 (228 arrivals, 228 departures) in the afternoon school peak between 3pm and 4pm

The expanded school total number of vehicle trips is estimated at 612 (345 arrivals, 267 departures) in the morning peak between 8am and 9am and 533 (267 arrivals, 267 departures) in the afternoon school peak between 3pm and 4pm.

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 83 (43 arrivals, 39 departures) in the morning peak between 8am and 9am and 78 (39 arrivals, 39 departures) in the afternoon school peak between 3pm and 4pm.

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

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 then taken off of the additional number of vehicle journeys on the network from the proposed expansion.

In this case, the 10% reduction applied to the total number of car trips generated by the school is taken off of the additional number of vehicle journeys on the network resulting in a new additional vehicle trips estimate of 22 (9 arrivals, 13 departures) in the morning peak between 8am and 9am and 25 (13 arrivals, 13 departures) in the afternoon school peak between 3pm and 4pm.

By applying the original mode share proportions to the proposed expanded school role, the number of students travelling by bus would increase by 61 and the number of students travelling by coach by 31. The number of these trips would further increase depending on the success of the School Travel Plan, as discussed above in terms of reductions in car journeys.

**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 WGSG has been added to this. Further, sensitivity testing has been undertaken adding the proposed expansion of the Academy to provide a comprehensive picture.



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The most significant impact by 2021 is at the Parsons Lane exit onto Oakfield Lane where there is an 5.5% increase in traffic predicted in the am peak and an 6.4% increase in traffic in the school pm peak. With the addition of the proposed Academy expansion traffic, these figures increase to 8.4% and 9.7% respectively. The junction most impacted by the expansion of the Academy and WGSG together is the Academy/ Boys Grammar exit onto Common Lane where there is an 8.7% increase in traffic predicted on the exit arm for the am peak and 12% at the school pm peak.

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 importance of securing and implementing an effective School Travel Plan.

Junction modelling has been undertaken by the Transport Consultants in order 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 WGSG traffic increases RFCs slightly to 0.94 and 0.93 and average queues to 12 and 10 PCUs respectively. Addition of the Academy 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 within the peak hours 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 close proximity of the zebra crossing to the Common Lane/ Academy/ Boy's Grammar Exit and the number of children using it, which is likely to increase with the expansions, must impact on the results. However, staff monitoring and control of the crossing at peak times, as proposed in the concurrent Academy Application, should help 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 150 pupil uplift and 5 additional classes equates to a requirement of 7.5 spaces. As previously outlined, staff car travel to work was surveyed at 88% and so, assuming a similar car mode share for the expanded school, the 5 additional staff would require 4.4 parking spaces. This application provides for 12 parking spaces.

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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. As well as several public bus services, the Wilmington Grammar Schools benefit from locally arranged coach services. As this is a bespoke, well established arrangement, it is considered reasonable to assume that the additional demand for journeys by bus can be accommodated on the vehicles themselves or by extra coaches. 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 WGSG and the Academy. 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 '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 WGSG 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 WGSG land which is necessary to mitigate the impact of the expansion of the Academy.

**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, particularly in terms of the junction assessments where a 10% reduction in total school traffic flows (with trips transferring primarily to bus and coach journeys) is assumed to result from the successful implementation of the plan. 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://jambusterstoms.co.uk/>

The WGSG 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.

Given the traffic pressures from parent parking on Parsons Lane, WGSG should consider participating in KCC's Responsible Parking initiative at <http://www.responsibleparking.co.uk/>. The Travel Plan does commit WGSG to provide at least one member of staff to oversee traffic and pedestrian movements on Parsons Lane. 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, especially the Academy in respect of enabling their students to



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access the Grammar school's coach services, can be expanded upon given the need to take collective action to address common issues.

Given the importance of the Travel Plan to the mitigation of the impact of the WGSG expansion, 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 plan (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;
- Completion of the on-site infrastructure (footpath link) shown on the submitted plan (drawing number 11231T-03) prior to the commencement of the construction works relating to the new building and its permanent retention thereafter;
- 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 new bus/ coach drop off and turning area within the school site to reduce congestion on Parsons Lane and Common Lane;
- Provision and permanent retention of the 6 bus/coach bays and 12 car parking spaces shown on the submitted plan within 6 months of the occupation of the extension;
- Provision of measures to prevent the discharge of surface water onto the highway;

## Item D6

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- Within 6 months of occupation of the extension, the submission of an updated School Travel Plan by WGSG, 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.
- The WGSG 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 WGSG 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