

Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated child drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726 (KCC/SE/0095/2018)

A report by Head of Planning Applications Group to Planning Applications Committee on 16 January 2019.

Application by Kent County Council Property and Infrastructure Support for a 2 form of entry expansion of the Trinity School involving internal reconfiguration of existing school building, two extensions to the existing building (additional floor on rear single storey wing and 3 storey block extension to the front of the building), new dedicated child drop-off/pick-up bus layby accessed off of Seal Road/A25, reconfigured parking layout including 14 additional staff parking spaces and 2 additional visitor spaces, new MUGA, additional hardstanding playground area and associated landscape at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726 (KCC/SE/0095/2018)

Recommendation: the application BE REFERRED to the Secretary of State for HCLG as a departure from the Development Plan on Green Belt grounds, and that SUBJECT TO his decision that PLANNING PERMISSION BE GRANTED SUBJECT TO compliance with the agreed Memoranda of Understanding and conditions.

**Local Members:** Mrs Margaret Crabtree

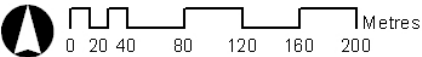
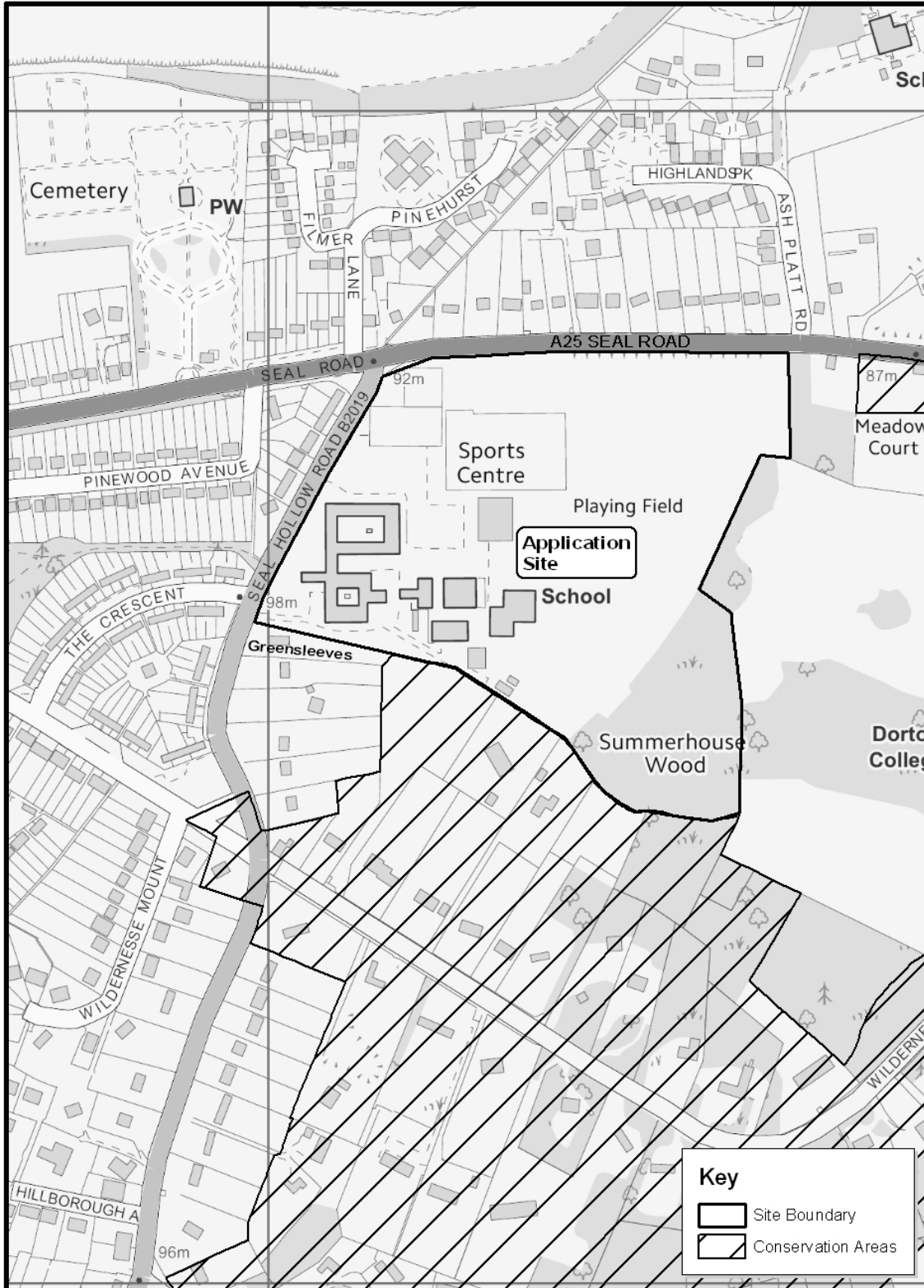
**Classification:** Unrestricted

#### Site

1. Trinity School shares a site with the Weald of Kent Grammar Annex, and is situated on the east side of Sevenoaks just over a mile from the town centre, on the site of the former Wildernesse School/Knoles (East) Academy. The 11.8 hectare site lies on the southern side of the A25 Seal Road, which is a main arterial route into and out of Sevenoaks from the east, and on the eastern side of Seal Hollow Road (B2019). The whole of the site is located within the Metropolitan Green Belt, and outside of the settlement confines of Sevenoaks. Trees and hedgerows line the boundaries of the site, which in the most part are dense and mature. The northern site boundary abuts the A25 Seal Road, with facing residential properties located to the northern side of that road. Seal Hollow Road lies to the west of the site, again with facing residential properties located to the far side of the road. To the east of the site lies Dorton College, although this is separated from the school site by a densely planted area of woodland known as Summerhouse Wood. The southern boundary of the site abuts the Wildernesse Conservation Area, which encompasses residential properties predominately on Wildernesse Avenue, Woodland Rise, Parkfield and Blackhall Lane.
2. In light of the site's Green Belt designation, this application has been advertised as a Departure from the Development Plan and would need to be referred to the Secretary of State following consideration at Planning Applications Committee if Members were minded to grant planning permission. *A site location plan is attached.*

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Site Location Plan



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Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

Existing Site Plan

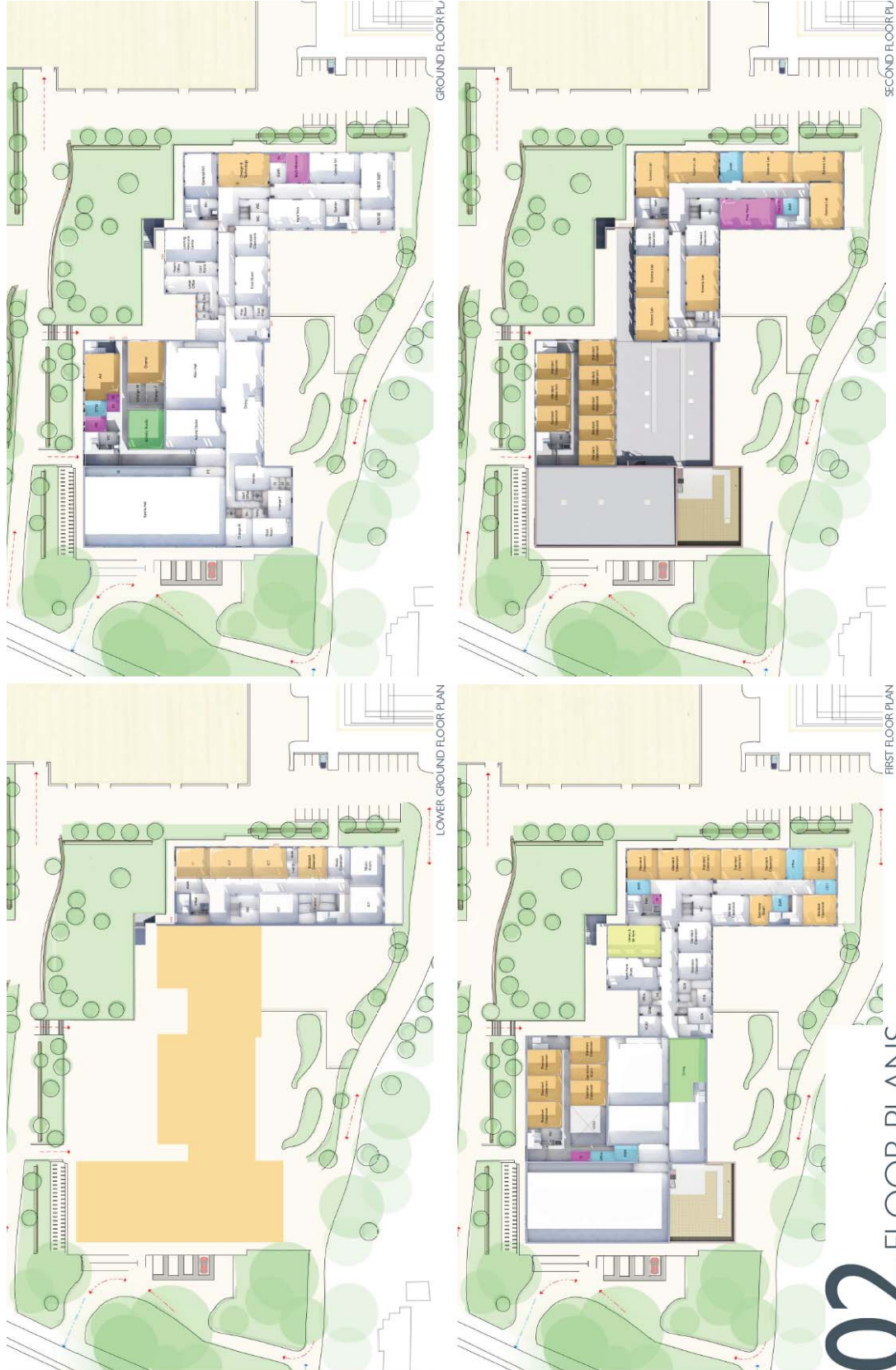






Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

Floor Plans



**02 FLOOR PLANS**  
TRINITY SCHOOL EXPANSION PROPOSAL

Bond Bryan Architects  
Trinity School  
Kent County Council

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Existing and Proposed Elevations



All visualisations are indicative of the design intent at this stage and may be subject to further design development.

04 VISUALISATIONS

TRINITY SCHOOL EXPANSION PROPOSAL





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Existing and Proposed Elavations



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#### Background/Relevant Planning History

3. The entire site was redeveloped in 2016 following the granting of planning permission references SE/14/13 and SE/15/2417. The table below summarises recent and relevant planning history at the site:

Application Reference	Description	Decision
KCC/SE/0375/2013 (SE/14/13)	Proposed redevelopment of the former Wildernesse School site: proposed demolition of existing school buildings retention and refurbishment of existing Sports Centre, erection of two new secondary schools (a 6 form of entry Sevenoaks Grammar Annexe and a 4 form of entry Trinity School), introduction of new vehicular and pedestrian accesses, rearranged and extended car park to provide 242 car parking spaces and dedicated child drop off/collection and bus zones, relocation of existing tennis courts into two new Multi Use Games Areas and associated detailed landscape works	Approved 11/07/2014
KCC/SE/0249/2015 (SE/15/2417)	Section 73 application to vary six planning conditions from planning permission reference SE/14/13 (conditions 23, 27, 28, 29, 30 and 31) to enable the development to be built and completed in two phases	Approved 14/12/2015
KCC/SE/0094/2016 (SE/14/13/RB)	Application for a Non-Material Amendment; partial implementation of the Grammar Annexe beginning with a 3FE School, with an additional 3FE added later subject to approval from the Department for Education, and resulting fenestration changes, omission of roof lights and changes to the material finishes of the sports hall.	Approved 03/05/2016

4. There are currently three non-selective schools in the Sevenoaks District, Knole Academy and Trinity School, both of which are within Sevenoaks Town and Orchards Academy which is in Swanley. Traditionally the expectation has been that many Sevenoaks based secondary students would travel to selective faith and non-selective schools in Tonbridge & Malling or Tunbridge Wells. For some families in the south of the Sevenoaks District, the nearest schools would be in Tonbridge or Tunbridge Wells, but the more usual reasons were that the Sevenoaks District did not contain any single sex, grammar or faith schools. The Grammar Annex and Trinity School, which is a faith school, have changed that dynamic and given Sevenoaks families more local choice.
5. In addition, demand for Year 7 places has increased in the Tonbridge & Malling and Tunbridge Wells Districts, to a point where fewer Sevenoaks students can access these schools due to distance criteria for admissions. Therefore, additional secondary school places are required within the Sevenoaks District to meet current and future demand (see the discussion section of this report for more detail in this regard). I am advised



Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

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that a completely new school is not a viable option as demand is insufficient, there is a lack of land availability and, in any instance, costs would be unjustified.

6. It is therefore proposed to expand Trinity School by 2 forms of entry (FE). This would increase the admission numbers each September from 120 to 180, an additional 60 year 7 places. This expansion commenced in September 2018, providing the accommodation required by reconfiguring internal spaces. The 2FE expansion would increase the school roll from 790 pupils (4FE including sixth form) to 1140 (6FE including sixth form), an increase of 350 pupils and 14 staff. Full occupancy is expected to be reached in September 2023.

#### Additional/Amended Information Following Initial Submission

7. Following the submission of this application, the applicant has submitted additional and amended information regarding the massing and scale of the development, and highway and access matters. In summary, the amendments made were changes to the proposed external materials to the southern elevation, and the relocation of the bus zone entrance 15 metres to the west. A response to the highway and access concerns raised by various consultees also proposed additional off-site highway mitigation measures. It is the amended proposal that will be discussed throughout this report.

#### Proposal

8. This application has been submitted by Kent County Council Property and Infrastructure and proposes to provide the accommodation required for the expanding school roll at Trinity School. The proposed development comprises of the following key components:
  - The expansion and refurbishment of Trinity School across five separate phases (see paragraph 9 below). The development proposed would increase the internal floor area of the school from approximately 6653m<sup>2</sup> to 9253m<sup>2</sup>, with the footprint increasing from 3465m<sup>2</sup> to 4122m<sup>2</sup>. The additional space would accommodate classrooms and specialist teaching areas, dining areas, a sixth form area, resources spaces and offices and storage;
  - Additional formal and informal external play spaces including an additional MUGA;
  - Increase in car parking provision on site from 236 to 258 spaces for staff and visitors, and an additional mini bus space;
  - A new bus and coach drop off for both schools on the site, with access and egress directly from the A25 (Seal Road);

It is the intention that all of the above would be completed by the end of the summer in 2020.

9. The five phase built accommodation proposed on the site is as follows:
  - Refurbishment of existing rooms to provide temporary and permanent general classrooms, temporary and permanent science labs, offices and storage. Two new mezzanine floors are also proposed to create dining, social and catering areas (Phase 1 A) *(NB. These works are internal and do not need planning consent)*;
  - **Three storey extension to the front of the school building (northern elevation) to house general classrooms, specialist teaching rooms & activity studio, changing and WC facilities, office and storage space, and a plant room (Phase 1B);**

Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

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- Refurbishment of existing rooms to provide specialist classrooms (ICT, Technology and Science Labs) (Phase 2A) *(NB. These works are internal and do not need planning consent)*;
  - **Addition of a new roof extension (additional floor) to the southern wing of the school building to provide space for science labs (Phase 2B)**;
  - Refurbishment of existing rooms to provide specialist and general teaching rooms (ICT, sixth form space and offices) (Phase 2C) *(NB. These works are internal and do not need planning consent)*;
10. As can be seen from above, only two of the five phases of works require planning consent, phase 1B and phase 2B. With regard to the phase 1B works, a three storey block would be constructed to the front of the school building, on the northern elevation, adjacent to the existing main entrance, on an area currently used for outdoor dining/amenity space. That flat roofed extension would be the same height as the existing three storey elements of the building, although would directly link with a two storey block and the sports hall. The fenestration is proposed to match that of the existing building and the footprint of the proposed extension would not extend the building line any further north than the adjacent sports hall. The extension would be finished in white render with dark grey brick work at the ground floor level, to match the material palette of the existing building.
  11. With regard to the phase 2B works, it is proposed to add an additional storey onto the existing two/three storey south eastern wing of the school building (the site levels drop from west to east meaning that the west elevation is two storey and the east three storey). The additional storey would increase the height of flat roofed wing by 3.5 metres, to approximately 12.5 metres at the western side and 15.8 metres on the eastern side. The existing building in this location is finished in white render, and this would be replicated on the east and west elevations of the additional story extension. However, the southern elevation of the additional storey extension would be finished in dark metal composite panels to add some relief to the elevation and reduce the perception of the massing when viewed from properties to the south.
  12. Externally, it is proposed to provide additional formal and informal outdoor play and sports areas, including a reconfigured entrance plaza to the north and east of the phase 1B extension to link with the existing school access. An additional MUGA is proposed to the south east of the site, to the immediate east of the two existing MUGAs on the site that are used by Trinity School (an additional two MUGAs on site are used by the Grammar Annex).
  13. Pedestrian and car access to the site would remain as existing, via Seal Hollow Road. However, a new 14 bay bus and coach drop off is proposed to the north of the site, accessed via the A25, with the existing bus and coach parking area (currently accessed via Seal Hollow Road) laid out for additional car parking and mini bus spaces. Parking restrictions are also proposed at the Seal Hollow Road junctions with the Crescent and Hillingdon Avenue to prevent parking on the junctions, in addition to footway improvements. Pedestrian crossing improvements are also proposed at the signalised Seal Hollow Road/A25 junction, with the implementation of a pedestrian crossing phase to cross the A25, and a dropped kerbed crossing facility at the Filmer Lane arm of the junction. A £10000 contribution to improvements to local Public Rights of Way SR165 and SU4 is also proposed by the applicant, in addition to a £5000 contribution regarding Travel Plan monitoring.

Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

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14. Photovoltaic (PV) panels are proposed to be installed on the roof, adjacent to an existing array of panels. A detailed energy statement was submitted with this application setting out the standards for design and construction that would reduce energy usage.

#### Planning Policy Context

15. The most relevant Government Guidance and Development Plan Policies as summarised below are pertinent to the consideration of this application:

- (i) **National Planning Policy Framework (NPPF) July 2018** and the **National Planning Policy Guidance** (March 2014), sets out the Government's planning policy guidance for England, at the heart of which is a presumption in favour of sustainable development. The guidance is a material consideration for the determination of planning applications but does not change the statutory status of the development plan which remains the starting point for decision making. However, the weight given to development plan policies will depend on their consistency with the NPPF (the closer the policies in the development plan to the policies in the NPPF, the greater the weight that may be given).

In determining applications, the NPPF states that local planning authorities should approach decisions in a positive and creative way, 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:

- 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;
- achieving the requirement for high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
- when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation;
- 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 94 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.*

- (ii) **Policy Statement – Planning for Schools Development (15 August 2011)** which sets out the Government's commitment to support the development of state-funded schools and their delivery through the planning system. In particular the Policy states that the Government wants to enable new schools to open, good schools to expand and all



Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

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schools to adapt and improve their facilities. This will allow for more provision and greater diversity of provision in the state funded school sector, to meet both demographic needs, provide increased choice and create higher standards.

(iii) **Development Plan Policies**

**Sevenoaks District Core Strategy: Adopted February 2011:**

**Policy LO1** - Requires new development to be focused within the built confines of existing settlements.

**Policy LO2** – Seeks to control development within Sevenoaks and seeks protection of the setting of the urban area and the distinctive character of the local environment. New developments in the Sevenoaks Urban Area should respect the physical and community identity of adjoining settlements and prevent further coalescence.

**Policy LO8** – Seeks to maintain the extent of Green Belt, and conserve and enhance the countryside, including the distinctive features that contribute to the special character of its landscape and its biodiversity.

**Policy SP1** – Requires all new development to be designed to a high standard, reflect the distinctive local character of an area, create safe, inclusive and attractive environments, incorporate sustainable development principles and maintain biodiversity. The Districts heritage assets (including Conservation Areas) and their settings will be protected and enhanced.

**Policy SP2** - Sets standards for sustainable design and construction. Institutional development will be required to achieve a BREEAM rating of at least 'very good'.

**Policy SP9** - Where new development creates a requirement for new or improved physical, social and green infrastructure beyond existing provision, developers will be expected to provide, or contribute to, the additional requirement.

**Policy SP10** – Promotes the provision of multifunctional green space by linking existing green space areas. The Policy also seeks the retention of open space, sports and recreational facilities, including outdoor sports facilities of value to the local community, unless any loss can be justified by additional provision of at least equivalent value to the local community.

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

**Sevenoaks Allocations and Development Management Plan (February 2015)**

**Policy SC1** - States that a positive approach should be taken in considering planning applications to reflect the presumption in favour of sustainable development contained in the National Planning Policy Framework. The

Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

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District Council will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. Planning applications that accord with the policies in the Local Plan will be approved without delay, unless material considerations indicate otherwise.

- Policy EN1 -** Sets out the need for high quality design and for proposals to meet criteria including: responding to scale, height and materials; respecting the topography and character of the site and any sensitive features; not result in the loss of buildings or open space that would affect the character of an area, provided satisfactory means of access and parking provision; include opportunities for increasing biodiversity potential, including sustainable drainage and to avoid harm to existing biodiversity; create a permeable layout; safe and easy access for those with disabilities; creation of a safe and secure environment to deter crime and fear of crime; include modern communication technology and infrastructure; and make efficient use of land.
- Policy EN2 -** Proposals should provide adequate residential amenities for existing and future occupiers of development, and safeguard amenities of existing and future occupiers of nearby properties by ensuring development does not result in excessive noise, vibration, odour, activity, vehicle movements, overlooking or visual intrusion and where it would not result in a loss of privacy or light.
- Policy EN4 -** Proposals that affect a Heritage Asset, or its setting, will be permitted where the development conserves or enhances the character, appearance and setting of the asset.
- Policy EN6 -** Proposals for lighting that affect the outdoor environment should not have a harmful impact on the amenity of nearby residential properties, amongst other matters.
- Policy GB8** Proposals to extend an existing non-residential building within the Green Belt which would meet the following criteria would be permitted – (a) the existing building is lawful and permanent in nature and (b) the design and volume of the proposed extension, taking into consideration the cumulative impact of any previous extensions, would be proportional and subservient to the original building and would not materially harm the openness of the Green Belt through excessive scale, bulk or visual intrusion.
- Policy T1 -** Sets out the need to mitigate against adverse travel impacts including their impact on congestion and safety, environmental impact such as noise, pollution and impact on amenity and health.
- Policy T2 -** Sets out that vehicle parking provision, including cycle parking, for non-residential developments should be in accordance with the advice of Kent County Council as Local Highway Authority.

Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

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**Green Belt Supplementary Planning Document (February 2015)** provides detailed guidance on the implications of applying for planning permission for development located within the Green Belt. The guidance will help to ensure consistency in decision making when determining planning applications in the Green Belt. The SPD provides additional information to assist with the interpretation and implementation of policies set out in the Core Strategy and Allocations and Development Management Plan (ADMP).

#### Consultations

16. **Sevenoaks District Council** raise no objection to this application, provided the County Council is satisfied that the development comprises appropriate development in the Green Belt and that the County Highway's Engineer finds the submitted application acceptable.

However, the District Council further state that insufficient information has been submitted to demonstrate that the increase in vehicle movements resulting from the expansion would not have an impact upon the adjacent Air Quality Management Areas. The District Council's Environmental Health Officer advises that an updated Travel Plan should be submitted pursuant to condition setting out specific measures to encourage more sustainable and less polluting modes of transport and the provision of facilities, such as electric charging points, to promote this.

**Sevenoaks Town Council** comment as follows:

"Sevenoaks Town Council welcomes the concept of separating car and buses by means of a dedicated bus zone on A25 (Seal Road) which seeks to remove school buses from Seal Hollow Road and thus reduce vehicle congestion in that area. Sevenoaks Town Council also welcomes measures to improve safety on the school site itself by removing the need for pupils to cross internal vehicle routes. Sevenoaks Town Council was pleased to note the staggering of the departure of pupils, through the provision of after-school clubs.

However, Sevenoaks Town Council expressed concern over the following:

- That the speed limit along the entire stretch of the A25 will not be reduced to 30mph.
- That the proposal will increase congestion and will lead to worsening air quality on A25
- Lack of detailed information regarding drop-off/pick-up of pupils arriving by car.
- That the Traffic Survey does not allow for the ongoing expansion of pupil numbers at Trinity School, Weald of Kent Grammar School Annexe and nearby Seal Primary School (Sevenoaks Town Council noted that the Automatic Traffic Counter was set to record during a week in August, i.e. during the school holidays.)
- Although the proposal refers to increased cycle rack provision, wider cycling infrastructure is not addressed. Sevenoaks Town Council is concerned over potential ramifications with regards to the Sevenoaks District Cycling Strategy and the various access routes to the school, as well as whether the necessary funding would be available."



Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

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**Seal Parish Council** comment as follows:

“Seal Parish Council welcomes the provision of a layby for school buses with direct access to the A25, but objects to the absence of other measures to cope with the increase in traffic at the junction with Seal Hollow Road, which is already has long queues at peak periods. The Parish Council also objects to the absence of measures to encourage safe walking and cycling to the school site. The Parish Council urges the County Council to adopt a longer term coordinated approach to major development along the A25 through Seal, and to ensure that traffic and sustainable transport improvements can be brought forward in response to development.

Despite complete redevelopment of the site there is still no pavement along the whole of Trinity/Weald school boundary on the south side of the A25. The Seal Hollow Road/A25 junction is the only crossing on the A25 for the increasing number of pupils of Seal Primary School resident in Sevenoaks town. The Transport Assessment also takes no account of the current doubling of intake at Seal Primary School.

The Parish Council also feels that the filter lanes for traffic turning off the A25 into Seal Hollow Road in both directions need to be wider and longer, and that present peak congestion at the junction will be exacerbated by the proposed exit of the bus layby, which is too close to the junction

With regards to a speed limit reduction on the A25, the Parish Council rejects the conclusion of the Police and KCC Highways, which take no account of the changing use of this section of the A25, the anomaly of a 40mph section of road on a primarily 30 mph road within the urban area, and the increasing need for the community and children in particular to walk along and cross the road. The only section of A25 with housing on the north side only is where the Weald and Trinity school site is located on the south side. These two major schools have no footpaths on their main road boundary which is a reason to reduce the speed limit. There is continuous traffic on this section of the A25 which splits the community and is a barrier to access to the Weald and Trinity schools south of A25, and Seal Primary School to the north.

*Seal Parish Council therefore requests the County Council to use its best endeavours:*

- To actively pursue a long term, coordinated approach to the problems of traffic at Seal and on the A25, through the County’s own investment and collaboration in other strategies, notably the Sevenoaks Local Plan, the Neighbourhood Development Plan, and the Community Infrastructure Levy. This includes safe cycling and walking routes to the schools in the Seal area, and in the longer term an east/west route separate from the A25 to be part funded by the proposed residential development at the Greatness Quarry north of the A25. It also includes coordinated traffic management at the junctions of A25 with Seal Hollow Road, Church Street and Ash Platt Road which give access to the schools.
- To ensure the preparation and pursuit of a coordinated and up to date Travel Plan for the site of the Trinity and Weald schools as a whole.

Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

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*The Parish Council requests that consent for the Trinity school expansion should be subject to:*

Improved mitigation:

- Provision of a pedestrian phase and/or larger pedestrian reservations at the Seal Hollow Road/A25 junction, and measures to increase the traffic capacity of the junction - notably improved filter lanes for traffic turning off the A25 into Seal Hollow Road in both directions, and a revised design for the bus layby to move the exit further from the junction.

Planning Conditions:

- A suitably worded planning condition should require the extension of the 30mph speed limit along the A25 to improve safety at the junction with Seal Hollow Road and at the nearby Ash Platt Road access to Seal Primary school;
- The off-site parking restrictions and footway improvements at Seal Hollow Road proposed in the Transport Assessment should be completed before the new school buildings are occupied; &
- A 'construction management plan' to be submitted and approved before work commences, to include access points and timing of construction vehicles, storage of materials, temporary parking for school staff, and the arrangements for pupils to enter and leave the school safely."

In addition to the above, the Parish Council welcome the financial contribution towards improvements to PROW SR165 and SU4.

The Parish Council also note that planning permission to expand Seal Church of England Primary School (application reference KCC/SE/0075/2018, granted in August 2018) was subject to the following informative:

*"Seal Primary School should pursue, as a matter of importance, the reduction of the speed limit to 30mph where the current 40mph speed limit exists on the A25 at Seal Hollow Road; the introduction of a pedestrian phase at the Seal Hollow traffic lights; and the inclusion of Seal Primary School within the 'Safer School Zone' programme in the interests of the safety of their pupils and to encourage more sustainable modes of transport".*

**Kent County Council Highways and Transportation** raises no objection to the application subject to the agreed mitigation measures, and conditions, and comments as follows:

"Access

Access to the site is from Seal Hollow Road and a new bus zone is proposed with a separate access and egress directly onto the A25 as shown in principle on MLM Drawing number 0003. The bus zone is for use by buses only and will be signed as such and gated outside of school operational times. Visibility splays are to be provided in accordance with current guidelines as shown on MLM drawing number 0004. A safety audit has been completed and subject to the recommendations the bus zone is considered acceptable.

Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

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#### Speed Limit

The reduction in the speed limit, from 40mph to 30mph, along the A25 Seal Road has been investigated as requested. KCC Traffic Schemes Team and Kent Police have reviewed the traffic data and assessed the suitability of the road for a 30mph speed limit and advised that the road is not suited to a reduction in the speed limit. The response received is as follows:

*'We appreciate that there is a school nearby which will be expanding and may increase pedestrian traffic, however we have concerns with this proposal as the existing 40mph acts as an intermediate speed limit between the 30mph in Seal village and the outskirts of Sevenoaks town. If the speed limit were to be reduced we would lose the impact of the existing 30mph speed limit gateways east bound in Seal, and west bound towards Sevenoaks. There are already compliance issues with the existing 30mph speed limit on sections of the A25; Seal Road west of Seal Hollow Road where the speed limit changes from 40 to 30mph and Bradbourne Vale Road. It is more than likely that there would be similar issues if the speed limit were reduced here. The 24-hour, 7-day mean speeds from the traffic count data were 32.6mph east bound and 34mph west bound, which are too high to support a 30mph speed limit.'*

*The A25 within the existing 40mph section is a suburban road with residencies on the north side only which are set back, there is street lighting present with a footway on the north side and several junctions and accesses. The A25 here has mainly a through traffic function. The existing 40mph speed limit would appear to be appropriate here and complies with Table 1, speed limits in urban areas in DfT Circular 1/2013, the Government guidance for setting local speed limits.*

*I have checked the 3-year collision record for this section of road, there has been 4 slight injury crashes where driver error is the main contributory factor and there is no evidence of these collisions being speed related.*

*Kent police have indicated that they would not support a 30mph speed limit at this location.*

*From the above analysis, it is with regret that we would not be looking to reduce the speed limit along this section of road and any application for a related TRO from a third party for this section of road would be unsuccessful.'*

#### Accessibility

The proposed school extension is expected to increase pedestrian traffic and in order to encourage this and enhance safety, improvements are proposed to the traffic signals at the A25 Seal Road/Seal Hollow Road junction as shown in principle on MLM drawing 0005. The improvements include the introduction of a pedestrian phase to the signals and dropped kerb crossings on Filmer Lane. Additionally, KCC Public Rights of Way team have identified a need for improvements to public footpath number SR164 and SU4 and an appropriate contribution is required for the works.

The provision of a dedicated cycle footpath to allow pedestrian and cycle access through the site to the A25 Seal Road has been considered. However due to safety concerns regarding the crossing of Seal Road, and potential problems of



Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

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students being dropped off adjacent to the crossing facility, this is not being pursued.

#### Impact

The traffic generation assessment indicates that the expansion of the school is likely to result in an additional 66 car trips, of which 13 are staff trips, an additional 102 pedestrian trips and 127 bus passenger trips.

Capacity assessments have been completed at the junction of A25 Seal Road/Seal Hollow Road using the Linsig programme. The results indicate that there would be some worsening of capacity and some additional queueing. The Practical Reserve Capacity at the junction would be reduced from +1.6% to -1.0%. However, the Linsig model does not consider the safety and capacity benefits of removing the buses from Seal Hollow Road and this is not fully reflected in the capacity results. It is considered that the provision of the bus zone would improve capacity at the A25 Seal Road/Seal Hollow Road by reducing the number of buses turning to and from Seal Hollow Road and that this would mitigate the impact of the proposed expansion. This view is corroborated by KCC traffic signals team.

#### Mitigation

A package of measures has been identified which are reasonable, proportionate and appropriate for the scale of the development proposed:

- Provision of a Bus Zone with access and egress off A25 Seal Road as shown in principle on MLM Drawing number 0003 with visibility splays provided as outlined on Drawing number 0004 to be provided within 2 months of occupation.
- A pedestrian phase [to the traffic signals] included on the western arm of the A25/Seal Hollow Road junction and dropped kerb crossings provided on Filmer Lane as shown in principle on MLM Drawing number 0005 and including the safety audit recommendations to be provided prior to occupation of the extension.
- An updated School Travel Plan with a contribution of £5000 to allow monitoring of the School Travel Plan to ensure that the targets and measures identified lead to a reduction in car travel by both pupils and staff. Targets in the Travel Plan to be modified to promote and encourage higher levels of non-car trips by staff as well as pupils. Additional cycle parking will be provided as demand increases and land to be set aside for such use. The annual Travel Plan survey will inform when further cycle parking is needed.
- Contribution for the improvement to public right of way numbers SR165 and SU4 between Seal Village and the Seal Road/Seal Hollow Road junction.
- Best endeavours to implement a Traffic Regulation Order to provide parking restrictions at the junctions of Seal Hollow Road with The Crescent and Hillingdon Avenue with footway improvements at the junction of Hillingdon Avenue/Seal Hollow Road as shown on MLM Drawing number 0002.

#### Conclusion

It is considered that the mitigating measures proposed, together with the Travel Plan and monitoring contribution, will effectively mitigate the impact of the school expansion on the highway and encourage and promote sustainable transport as

Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

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an alternative to car trips. I can confirm that KCC Highways do not have reason to object in accordance with the National Planning Policy Framework subject to the mitigating measures listed above and the following conditions:

- A construction management plan is required for approval by the Planning Authority to include 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. 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.
- Provision and permanent retention of the vehicle parking spaces shown on the submitted plans.
- Provision and permanent retention of the vehicle loading/unloading and turning facilities shown on the submitted plans.
- Gradient of the access to be no steeper than 1 in 10 for the first 1.5 metres from the highway boundary and no steeper than 1 in 8 thereafter.
- Provision and maintenance of the visibility splays shown on the submitted plans with no obstructions over 0.9 metres above carriageway level within the splays.

**Public Rights of Way (PROW)** state that PROW SR164/SU4 coming from Seal Village is a very well used pedestrian route that could benefit from improvements funded by this development. PROW SU7, which leads from Pinewood Avenue onto Seal Hollow Road, and also links with Mill Pond Wood and Hillingdon Avenue would also benefit from some improvement at the Seal Hollow Road end, including installation of pedestrian barriers and widening of the entrance.

**Environment Agency** raises no objection to the application subject to conditions regarding ceasing work should previously unidentified land contamination be found, control of the infiltration of surface water and restrictions regarding piling and foundation designs.

**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

**Sport England** does not wish to raise an objection to this application, subject to the imposition of a condition requiring the submission and approval of a Community Use Agreement prior to the first use of the development.

**The County Council's Biodiversity Officer** no comments received to date.

**The County Council's Conservation Architect** comments as follows:

"The Wildernesse Conservation Area Appraisal sets great store on the openness of the layout of the estate, landscaping and the uniform height of the properties. The school site is well screened from the Conservation Area by

Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

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hedges and mature trees, and the planning statement confirms the retention of this substantial boundary landscaping.

As the proposed extensions to the existing school building:

- do not exceed existing building height,
  - the extension design reflects the existing building style, and
  - the proposals ensure the separation distance between the school buildings and nearest residential properties to the south are maintained,
- then the proposals will also have little impact on the Conservation Area and I therefore have no adverse comments to make on built heritage grounds.”

#### Local Member

17. The local County Member, Mrs Margaret Crabtree, was notified of the application on the 31 May 2018, and further notified of the additional and amended information regarding highway and access matters on the 19 October 2018. The following comments have been received:

“KCC has a statutory duty to provide places for the children in Kent and the proposals for the extension of The Trinity School in Sevenoaks provide the extra places required, as well as taking into account the extra traffic this would produce. The measures to mitigate extra traffic on Seal Hollow Road and parking in residential roads nearby seem to be well thought out and sensible.”

#### Publicity

18. The application was publicised by an advertisement in a local newspaper, the posting of 4 site notices and the individual notification of 114 residential properties. All those that wrote in regarding the application were also notified of the submission of additional and amended information regarding scale and appearance on the 4 October, additional and amended information regarding highway and access matters on the 19 October 2018.

#### Representations

19. In response to the publicity, 16 letters of representation have been received, including 3 letters of support. A summary of the main planning issues raised/points of objection is set out below:

##### Amenity Matters

- The development would substantially increase the mass of the school when viewed from neighbouring properties;
- The massing of the building should be broken down by use of varying materials/colours;
- Newly completed properties in the Wildernesse Conservation Area have had to adhere to strict restrictions on height. The school building already overlooks neighbouring properties, and the proposals would make that worse;
- Any windows that overlook neighbouring properties should have obscured glass;
- There is very little screening along the southern site boundary, especially evergreen planting. Additional evergreen planting should be provided;

Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

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- External lighting should be kept to a minimum, be at low level and directed not to affect neighbouring properties;
- The extension at the front of the school should be moved so that it would not affect the views of neighbouring properties;
- The proposed bus drop off area would result in removal of trees on the site boundary, which provide an attractive screen along the A25 and screen the existing flood lit pitch;
- The new bus entrance/exit is directly opposite homes and may affect access to driveways;
- Additional traffic generates additional noise and air pollution;
- Building work on this site has not long been completed – the proposed development would cause more disruption for local residents;

#### Highway and Access Matters

- The development would result in additional traffic on Seal Hollow Road and would create major congestion, especially at the junction with the A25;
- There are no improvements proposed to pedestrian and cycling safety;
- A cycle/footway should be provided within the site boundary line extending from the site entrance on Seal Hollow Road along the A25 towards Seal. This would remove pedestrians from the narrow footpath on the A25, and could also be used by parents accessing Seal Primary School;
- The existing entrance/exit to the site should be improved and controlled by traffic signals at peak times;
- A pedestrian crossing phase should be introduced on the A25 traffic signals;
- An entrance for all school traffic should be created on Seal Road (A25), and the A25 widened at that point to create a dedicated right turn lane into the site;
- Seal Hollow Road should be widened;
- Since the new schools have opened the Seal Hollow Road/A25 Junction has been a nightmare, and this proposal would make this worse;
- Buses turning into and out of the proposed bus pick-up/drop-off will have a negative impact on traffic flows on the A25;

#### Support

- Support the expansion of the school;
- The application will address existing highway safety and parking matters;
- The parking restrictions proposed are supported, and should be implemented without delay;

#### Other

- Many parents choose Trinity School due to its smaller pupil intake. Expanding the school would completely change the character of the School;
- A new school should be established which would have capacity in the future, rather than this short term solution;
- The development is in the Green Belt, so design and massing is important;
- The development is adjacent to a Conservation Area (CA) and views into and out of the CA must be considered.

Two representations from The Sevenoaks Society were also received. The Society do not oppose the expansion of Trinity School, but consider the arrangements for car access to be completely unsustainable. A condition of consent should require the

Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

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School to produce a 'Green Transport Plan' which should restrict car journeys to the school in all but essential cases, and ensure the effective staggering of school times with the Grammar Annex. In addition, 'no stopping' restrictions should be introduced and enforced along Seal Hollow Road and the A25, and pedestrian crossing facilities improved. The School Travel Plan must also be monitored and targets met before the development is occupied.

#### Discussion

20. In considering this proposal regard must be had to the Development Plan Policies outlined in paragraph 15 above. Section 38(6) of the 2004 Planning and Compulsory Purchase Act states that applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. Therefore, this proposal needs to be considered in the context of Development Plan Policies, Government Guidance, including the National Planning Policy Framework (NPPF) and the Planning for School Development Policy Statement, and other material planning considerations arising from consultation and publicity. Issues of particular relevance include the need for school places, impact upon the Metropolitan Green Belt, highway implications and access, general amenity matters, and whether the development is sustainable in light of the NPPF.
21. Development Plan policies seek to require developments to be sustainable, well designed and respect their setting. This is particularly relevant to this development site which is identified within the Development Plan as being within the Metropolitan Green Belt. Policy GB8 of the Sevenoaks District Core Strategy, seeks to resist inappropriate development within the Green Belt, unless justified by exceptional circumstances. Further, Policy GB8 of the Sevenoaks Allocations and Development Management Plan states that the design and volume of a proposed extension, taking into consideration the cumulative impact of any previous extensions, must be proportional and subservient to the original building and not materially harm the openness of the Green Belt through excessive scale, bulk or visual intrusion.
22. The NPPF, section 13, paragraph 133 states that the Green Belt serves five purposes:
  - a. to check the unrestricted sprawl of large built up areas;
  - b. to prevent neighbouring towns merging into one another;
  - c. to assist in safeguarding the countryside from encroachment;
  - d. to preserve the setting and special character of historic towns; and
  - e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

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



Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

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### Green Belt Considerations

23. By virtue of the criteria in the NPPF, and various Local Plan Policies, the development is considered to be inappropriate in Green Belt terms. Although paragraph 133 of the NPPF lists examples of development that could be considered appropriate within the Green Belt, I am of the view that the proposals would not meet these exceptions and that the development is, therefore, inappropriate development in the Green Belt. Inappropriate development is, by definition, harmful to the Green Belt and it is for the applicant to demonstrate why permission should be granted with regard to planning policies and other material considerations. Such development should not be approved, except in very special circumstances. It is, therefore, necessary to consider the impact of the development against Green Belt Policy, to consider the impact on the openness of the Green Belt and whether or not there are very special circumstances that would warrant setting aside the general presumption against inappropriate development.
24. A Planning Statement was submitted in support of this application, which sets out what the applicant considers to be the very special circumstances that warrant setting aside the general presumption against what would be inappropriate development in the Green Belt. The applicant considers the following ‘very special circumstances’ are sufficient to collectively outweigh a Green Belt policy objection:
- i) The identified educational and operational need for additional non-selective Secondary School places within the Sevenoaks District;
  - ii) National Policy and Central Government Support for the delivery of State Funded Schools;
  - iii) A lack of suitable alternative development options;
  - iv) The extent of community and sustainability benefits that the proposal would deliver; and
  - iv) The quality of the design and level of mitigation proposed would ensure that the impact on the openness of the Green Belt would be limited.

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

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

25. As outlined in paragraph 15 of this report, great emphasis is placed within planning policy generally, specifically paragraph 94 of the NPPF, on the need to ensure that a sufficient choice of school places is available to meet the needs of existing and new communities. The NPPF states that Planning Authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. The NPPF further states that Planning Authorities should give great weight to the need to create, expand or alter schools. The Policy Statement – Planning for Schools Development (15 August 2011) also sets out the Government’s commitment to support the development of state funded schools and their delivery through the planning system. There is a presumption in favour of the development of state funded schools expressed in both the NPPF and the Policy Statement – Planning for Schools Development.

Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

26. Kent County Council, as the Strategic Commissioner of Education Provision in the County, is responsible for ensuring that there are sufficient school places of high quality for all learners. As outlined in paragraphs 4 and 5 of this report, traditionally the expectation has been that many Sevenoaks secondary students would travel to selective, faith and non-selective schools in Tonbridge & Malling or Tunbridge Wells. For some families in southern Sevenoaks District, the nearest schools would be in Tonbridge or Tunbridge Wells, but the more usual reasons were that there were no single sex, grammar or faith schools in Sevenoaks. This expectation has been under pressure recently as demand for Year 7 places increases in Tonbridge & Malling and Tunbridge Wells districts. This demand has now reached a point where fewer Sevenoaks students can access these schools because of distance criteria for admissions. This puts more pressure onto the Sevenoaks secondary schools.
27. In addition to the above, the following factors are considered by the applicant to be the key drivers behind the increased demand for Secondary School places within the Sevenoaks District:
- 1) Primary school expansion over the last six years within the Sevenoaks District, which is now feeding into Secondary demand;
  - 2) Increased birth rate;
  - 3) Medium scale housing development; and
  - 4) Inward migration from within Kent, London, EU & non-EU.
28. As outlined in paragraph 6 of this report, to meet this demand for additional Secondary School places within the Sevenoaks District, Kent County Council, as the Strategic Commissioner of Education Provision, has agreed to expand Trinity School by 2 Forms of Entry. Trinity School is a popular faith school and the expansion in the PAN from 120 to 180 is therefore in line with the local authority aim of expanding popular, successful schools and providing local schools for secondary aged children. An additional 60 Year 7 places were provided in September 2018, and it is proposed to increase the roll incrementally each year until the school will offer 180 places in each year. The accommodation required for the 2018 intake was provided by internal alterations. However, to be able to maintain the increase in PAN for future September intakes, additional accommodation is required, as proposed in this application. Without this accommodation, the continued expansion of Trinity School would not be possible. Need is therefore a key determining factor.
29. The 2018–2022 Kent Commissioning Plan (prepared by the County Council as Education Authority) provides forecasts that indicate an increase in the demand for secondary school capacity within the Sevenoaks District. Furthermore, this increased demand shows no signs of reducing over the forecast period. The forecast surplus/deficit of places for both year 7 and for all year groups is shown in the table below;

	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
Year 7	49	-53	-69	-68	-104	-126	-107
Year 7 - 11	184	48	-46	-127	-256	-430	-485

Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

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30. The table clearly shows that the year on year cumulative shortfall is 2FE for two years, rising to 4FE until 2023. However, these forecasts do not take into account demand generated by new housing or demographic changes, so the pressures could be greater in reality. Further, the figures for Sevenoaks are skewed by a lack of a boys Grammar provision. In the past, more than 40% of secondary aged students in the South of the Sevenoaks district, travelled out of area to attend schools in Tonbridge or Tunbridge Wells. The Weald of Kent satellite currently accommodates 3FE of Grammar provision for Girls, with permission granted for the accommodation required for 3FE of Grammar provision for boys also. When that accommodation is provided, it will effectively transfer 3FE of selective provision back into the Sevenoaks District.
31. However, non-selective Year 7 demand in Sevenoaks is increasing and the grammar Annex does not cater for that need. An additional 2FE of non-selective school places was required to manage demand in 2018/19 and was initially accommodated by internal alterations. The applicant advises that that is likely to be sufficient until 2020/21, when a third FE would be required. The following year, 2021/22, a fourth FE is indicated. Those additional 2FE would need to be accommodated elsewhere in the district (most likely at Knole Academy given the limitations of non-selective school site options within Sevenoaks District) but this decision is yet to be made and any built accommodation would be subject to planning permission.
32. Based on the above, in my view, it is evident that a clear case of need for additional secondary school places within Sevenoaks exists. Much of the District is within the Metropolitan Green Belt and it needs to be borne in mind that the Green Belt covers a wide area where people live and that these people need local school facilities just as much as those outside of the Green Belt. The applicant has demonstrated that there is an existing shortfall of places within the local area, and a future need which will be further outstripped by demand unless additional places are provided. Support for the provision of school places is heavily embedded in the NPPF, the Planning for School Development Policy Statement, and local Planning Policy, and I consider that the need for the development should be given significant weight in this instance.

#### Alternative Development Options

33. As part of the applicant's case of very special circumstances, alternative development options have been assessed and the applicant has concluded that the development as proposed is the only viable option available. Having accepted a need for additional school places within the Sevenoaks District, the alternative development options available must be considered. First, as outlined above and in paragraph 4 of this report, there are only three non-selective secondary schools in the Sevenoaks District, Knole Academy and Trinity School, both in Sevenoaks Town, and Orchards Academy in Swanley. The Area Education Officer assessed these three sites against a number of criteria including highway and access matters, site area, sporting facilities, sustainability, proximity to demand, location and number of Year 7 applications each year, and concluded that in this case that the only two appropriate and suitable options were expansion of either Knole Academy or Trinity School. I am advised that a completely new school on a new site would not be a viable option as demand is insufficient, there is a lack of land availability, and costs would therefore not be justified.
34. The applicant advises that Knole Academy is an 8FE School, which is considered to be a viable number to maintain a sustainable school. Trinity School on the other hand is

Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

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4FE, which is not considered by the County Council to be sustainable (the size of Trinity School was agreed by the Department of Education). By expanding Trinity School by 2 FE to 6FE the school could operate more sustainably, a key principle underlying planning policy and guidance. Both schools satisfy various other criteria such as proximity to demand, site size, site ownership, and delivery achievability. However, a key consideration is the number of first preferences received by the schools, as this shows parental choice and popularity. Trinity received 233 first preferences for a 4FE intake of 120, whereas Knole Academy received 184 against a 8FE intake of 240. Both schools are within the Metropolitan Green Belt.

35. The local Education Authority has a statutory duty to provide sufficient school places and, on balance, to address the current and future demand for additional secondary places, considers that the Trinity School provides the best solution to ensure that the people of Sevenoaks and the surrounding villages have access to a school of their choice which offers high quality teaching facilities. In considering the above, and the fact that both Trinity School and Knole Academy are within the Green Belt, I am satisfied that development of the Trinity School would offer a sustainable and appropriate solution. At 4FE it is not currently operating in a sustainable way, and parental choice shows that of the two schools it is far more popular; this may be due to its faith status.
36. Having accepted that offsite alternatives are not practicable, development options within the existing Academy site must be considered. Although the whole of the Academy site is within the Green Belt, arguably development in some areas of the site would have a lesser impact on the openness on the Green Belt than others. As outlined in paragraph 9 of this report, this application proposes two extensions to the existing school building, additional sports facilities and a new bus drop off loop. The impact of the proposed development on the openness of the Green Belt will be discussed below. However, with regard to location of the proposed development, and alternative locations within the School site, I am satisfied that alternative development options would have resulted in a loss of playing field, impacted upon car parking, resulted in a loss of important habitat areas and/or were not of a sufficient size. Further, alternative locations for built development remote from main school building would arguably have a greater impact on the openness of the Green Belt by virtue of being in more open areas of the site.
37. With regard to the additional MUGA, I am satisfied that this is proposed in the most logical and appropriate location, adjacent to the existing MUGAs and on the edge of the playing field. Alternative locations within the site would be disjointed from the existing games courts and/or remote from the building so would not be practicable. With regard to the proposed bus drop off loop, as outlined in paragraph 13 of this report, although arguably such a facility would be better located to the east of the site adjacent to existing car parking and access points in terms of impact on the Green Belt, it is proposed where it is for highway safety and mitigation purposes. Alternative locations would not be fit for purpose.
38. In considering the above, I am satisfied that the location and siting of the development is the most viable and logical within the academy site. The impact on the openness of the Green Belt will be discussed later in this report.

Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

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The extent of community and sustainability benefits that the proposal would deliver

39. The applicant considers that the proposal would lead to several demonstrable community benefits. The first is that an appropriate increase in on-site education provision and associated infrastructure would lead to a greater number of equipped students in the locality which will have long-lasting effects on their personal lives and local communities. In addition, as detailed earlier in this report, many secondary pupils have to travel to Tonbridge and/or Tunbridge Wells due to a lack of school places in Sevenoaks. This is unsustainable from an environmental perspective, as well as having an impact on the pupil's wellbeing, and thus the proposals seek to resolve this through the appropriate expansion and enhancement of the existing and popular Trinity School. Furthermore, the proposals make provision for additional parking and a new dedicated bus drop off / pick up point with independent access. These attributes, in conjunction with the continued implementation of School Travel Plan measures, would secure a highly sustainable development at both strategic and local levels. In conjunction with other factors, in my view these benefits of the proposal add to the Case of Need for the development.

Impact on the Openness of the Green Belt

40. This application proposes development that would encroach into the Green Belt, which could harm its openness. First, it is important to note that the site is well screened from public views by existing buildings, and mature boundary planting and screening. However, openness of the Green Belt is described as an 'absence of development' irrespective of the degree of visibility of the land in question from public vantage points. Therefore, any physical development within the Green Belt, whether visible or not, would have some impact on the openness. Whether that impact is either acceptable or unacceptable is a matter of fact or degree based on the specifics of each case.
41. The applicant advises that the siting of the two school extensions have been carefully considered so as to minimise their impact on the openness of the Green Belt. As detailed earlier in this report, the two extensions are contained within the confines of the existing building, one being a three storey extension to the front of the school on an area of hardstanding, bound to the south and west by the existing school building and not extending the building line further to the north (see paragraph 10), and the other being an additional storey to the south eastern wing of the school building (see paragraph 11). The overall building height would not increase, and due to the design of the front extension, the building would not appear visually dissimilar to the existing. As such, I am satisfied that the siting of the development is the most appropriate location within the site in terms of limiting the impact of the proposed school building on the openness of the Green Belt. Further, I am satisfied that the two extensions proposed are of an appropriate scale and massing for the site in Green Belt terms when considering that the overall building height would not increase and that the building line would not be extended any further north than the existing. The impact of the development on the amenity of neighbouring properties will be discussed later in this report.
42. With regard to the additional MUGA and the bus drop off loop, as stated above I am satisfied that these elements of the scheme are proposed in the most logical and appropriate locations. These elements of the development are 2-dimensional engineering solutions, located adjacent to existing car parking/hardstanding/games courts, and would be screened by existing and proposed landscaping. As such I am



Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

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satisfied that they would not have a significant detrimental impact on the openness of the Green Belt.

43. In considering the above, I am satisfied that the proposed development would have a limited impact on the openness of the Green Belt. Whilst there is inevitably some impact on the Green Belt, I am satisfied that the presence of the extensions to the school, MUGA and bus drop off loop, would be contained within the immediate context of Trinity School/Grammar Annexe development, and that the effect on the openness of the Green Belt would be limited. In my view, the proposed layout represents the option which strikes the best balance between minimising intrusion into the Green Belt and providing sufficient accommodation and facilities to enable the Trinity School to deliver its educational model and operate successfully.

#### Summary – Very Special Circumstances/Green Belt Considerations

44. Overall, I accept the applicant's assessment and application of Green Belt Policy as set out in the submitted documentation, and I have considered this in the context of the Development Plan Policies and the NPPF. The development is inappropriate development for the purposes of Green Belt Policy consideration and is, therefore, by definition harmful. Nevertheless, in my view, the considerations summarised above are sufficient collectively to constitute 'very special circumstances' capable of outweighing harm, in this particular case. Furthermore, I accept that the particular siting and massing of the proposals have been carefully considered to help mitigate the impact of the development on the functioning and openness of the Green Belt. Accordingly, I do not consider that an objection on Green Belt grounds would be warranted in this particular case. However, if Members were minded to grant permission, the Secretary of State for Housing, Communities and Local Government would have to be consulted before permission could be granted.

#### Access and Highway Matters, including Public Right of Way

45. As outlined in paragraph 19 of this report, there is some local objection to this application based on highway and access concerns, in addition to the concerns expressed by both Sevenoaks Town Council and Seal Parish Council (see paragraph 16). The primary points of local concern and objection relate to the capacity of local roads, highway and pedestrian/cycle safety and the issue of reducing the speed limit on the A25 from 40mph to 30mph.
46. As set out in the formal views of Kent County Council Highways and Transportation (H&T), the submitted traffic generation assessment indicates that the expansion of the school is likely to result in an additional 66 car trips, of which 13 are staff trips, an additional 102 pedestrian trips and 127 bus passenger trips. To mitigate the impact of the expansion and the additional vehicular and pedestrian traffic that the additional 2FE intake would generate, the applicant has proposed a package of mitigation measures which are summarised as follows:
- Provision of a dedicated bus pick-up/drop off with access and egress off the A25 Seal Road;
  - Inclusion of a pedestrian phase on the western arm of the A25/Seal Hollow Road junction and dropped kerb crossings provided on Filmer Lane;

Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

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- An updated School Travel Plan is to be prepared, and a contribution of £5000 to allow monitoring of the School Travel Plan has been agreed;
  - A £10000 Contribution for the improvement to Public Right of Way numbers SR165 and SU4 between Seal Village and the Seal Road/Seal Hollow Road junction;
  - Best endeavours to implement a Traffic Regulation Order to provide parking restrictions at the junctions of Seal Hollow Road with The Crescent and Hillingdon Avenue with footway improvements at the junction of Hillingdon Avenue/Seal Hollow.
47. H&T are of the view that the mitigating measures proposed would effectively mitigate the impact of the school expansion on the local highway network, and would also promote and encourage sustainable transport methods as an alternative to car trips. On that basis, H&T raise no objection to this application subject to the conditions of consent securing of the above mitigation and further conditions regarding construction matters. I can confirm that the required £5000 Travel Plan monitoring contribution and the £10000 contribution to PROW improvements have both been secured and the signed Memorand of Understanding have been received.
48. With regard to local highway and junction capacity issues, capacity assessments have been completed at the junction of the A25 Seal Road/Seal Hollow Road using the Linsig programme. The results indicate that there would be some worsening of capacity and some additional queueing at the junction as a result of the additional 2FE. However, as advised by H&T, the Linsig model does not consider the safety and capacity benefits of removing the buses from Seal Hollow Road and this is not fully reflected in the capacity results. It is therefore considered that the provision of the 14 space bus pick-up/drop-off would improve capacity at the A25 Seal Road/Seal Hollow Road junction by reducing the number of buses turning into and out of Seal Hollow Road and that this would mitigate the impact of the proposed expansion. H&T confirm that this view is corroborated by the County Council Traffic Signals Team. I therefore am satisfied that the mitigation proposed, specifically the dedicated bus drop-off and pick-up, would effectively manage and mitigate the capacity issues that the additional traffic associated with the 2FE expansion would generate. Should permission be granted, a condition of consent would require the bus pick-up/drop-off loop to be provided and be operational within two months of occupation of the development, as required by H&T.
49. Further, the existing bus drop off area on the site would be laid out to provide additional car parking, which would aid in mitigating existing concerns regarding on street car parking at peak school times. Parking restrictions are also proposed at the junctions of Seal Hollow Road with The Crescent and Hillingdon Avenue (subject to a separate TRO procedure) with associated footway improvements at the junction of Hillingdon Avenue/Seal Hollow Road. The parking restrictions and footway improvements are welcomed by local residents and the Parish and Town Council, and would also aid in improving safe pedestrian access to the site.
50. With regard to pedestrian and cycle access to the site, it is suggested by local representatives that a footway/cycle way should be provided to the south of the A25, running along the school's northern site boundary with the A25. The existing footway to the north of the A25 is narrow in places and heavily used at peak school times to access not only Trinity School/Weald of Kent Grammar Annex but also Seal Primary School. The applicant and H&T have considered this option, and discounted it for various reasons, including land availability, loss of boundary screening vegetation, and most importantly highway safety issues. Should a footway/cycleway be provided, this

Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

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would come to an end in line with the school sites eastern boundary. A crossing would need to be provided at this point to link with the footway to the north of the road. Not only would such a crossing impede the traffic flow on the A25, it could encourage parents to drop pupils off on the A25, which could create a highway safety issue. Further, we should be mindful that this application seeks consent for a 2FE expansion and requiring the provision of a new footway/cycleway (in addition to the mitigation already proposed) would be disproportionate and unreasonable in planning terms.

51. However, pedestrian and cycle access to Trinity School has been considered by the applicant, and mitigation in that regard to proposed and supported by H&T. In addition to the proposed footway improvements at the junction of Hillingdon Avenue/Seal Hollow Road, a pedestrian phase to the signals at the Seal Hollow Road/A25 Seal Road junction is proposed as are dropped kerb crossings on Filmer Lane opposite. These improvements are welcomed by the Sevenoaks Town Council and Seal Parish Council, and would be secured by appropriately worded planning conditions, should permission be granted.
52. In addition, although this development would not directly impact upon the local Public Right of Way (PROW) network, the applicant has agreed to provide a £10000 contribution to PROW improvements, specifically to PROW SR164/SU4 which links the A25 and the area around Trinity School with Seal Village. A Memorandum and Understanding (MoU) has been received, signed by Children, Young People & Education, and Growth, Environment & Transport, agreeing to the contribution. Improvements to these PROWs would provide an enhanced alternative pedestrian route between Seal Village and the area around Trinity School to using the footway to the north of the A25. In addition to being of benefit to Trinity School students, this would also be of benefit to parents of pupils at Seal Primary School. Should permission be granted, a condition of consent would refer to the received MoU, which now forms part of the planning application documentation. Subject to that condition, and those referred to in paragraph 51 above, I am satisfied that sufficient mitigation has been proposed to ensure safe pedestrian access to the site.
53. In addition to the above, in order to further encourage the use of more sustainable methods of transport, including cycling to school, an updated School Travel Plan would be required for submission pursuant to condition, should permission be granted. The Travel Plan would need to include specific targets to promote and encourage higher levels of non-car trips to and from the site by staff as well as pupils. Additional cycle parking is to be provided on the site as demand increases and land is set aside for such use. The annual Travel Plan survey will inform when further cycle parking is needed.
54. Given the importance of the Travel Plan in this instance, Highways and Transportation have requested a contribution of £5000 to ensure adequate auditing, oversight and ongoing staff resourcing support, with the money used by Highways and Transportation, to allow staff time to help the Trinity School manage arrangements effectively on and off site, and to help deliver and monitor the travel plan targets. As with the PROW contribution, monetary contributions cannot be required by planning condition, so a Memorandum of Understanding has been submitted, signed by H&T and the Education Authority, to agree to this contribution. 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, with ongoing monitoring/auditing of the Travel Plan for a period of 5 years. The Travel Plan must be subject to annual updates

Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

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with the funding secured (as above) used to ensure adequate resourcing to audit and oversee this process. Subject to that condition, and the conditions outlined in paragraphs 51 and 52 above, I am satisfied that the development as proposed would improve pedestrian and cycle access arrangements, aiding safer access and encouraging the use of sustainable transport methods in lieu of the private car.

55. Lastly, Sevenoaks Town Council and Seal Parish Council consider that the speed limit on the A25 Seal Road should be reduced from 40mph to 30mph, extending the existing 30mph speed limit on the A25 as it runs through Seal Village. By way of background, this matter was also raised in the determination of application reference SE/18/1521 (KCC/SE/0075/2018) which proposed the expansion of Seal Primary School. An informative was placed on the planning permission requesting that Seal Primary School pursue the reduction of the speed limit to 30mph on the A25 as a matter of importance. As this matter has been raised by the Town and Parish Council's in their consultation responses on this application, the applicant was requested to investigate this further in consultation with the County Council's Traffic Schemes Team.
56. As detailed on the formal consultation response from H&T (see paragraph 16), the reduction in the speed limit, from 40mph to 30mph, along the A25 Seal Road has been investigated and KCC Traffic Schemes Team and Kent Police have reviewed the traffic data and assessed the suitability of the road for a 30mph speed limit and advised that the road is not suited to a reduction in the speed limit. It is advised that the existing 40mph section of the A25 acts as an intermediate speed limit between the 30mph in Seal village and the outskirts of Sevenoaks town. If the speed limit were to be reduced the impact of the existing 30mph speed limit gateways east bound in Seal, and west bound towards Sevenoaks would be lost. Further, H&T advise that the A25 within the existing 40mph section is a suburban road with residencies on the north side only which are set back, there is street lighting present with a footway on the north side and several junctions and accesses. It is considered by H&T that the A25 here has mainly a through traffic function. Therefore, I am advised that the existing 40mph speed limit would appear to be appropriate here and complies with Table 1, speed limits in urban areas in DfT Circular 1/2013, the Government guidance for setting local speed limits.
57. In addition to the above, H&T have checked the 3-year collision record for this section of road. There have been 4 slight injury crashes where driver error is the main contributory factor and there is no evidence of these collisions being speed related. Kent Police have also indicated that they would not support a 30mph speed limit at this location. H&T therefore conclude that they would not be looking to reduce the speed limit along this section of the A25 and that any application for a related TRO from a third party for this section of road would be unsuccessful. Based on this information, I am satisfied that the matter cannot be taken any further as the approval process for a reduction in speed limit would be via a formal TRO, to be considered by KCC Traffic Schemes Team and Kent Police. They have concluded that a TRO would be unsuccessful.
58. In addition to the securing of the mitigation measures listed in paragraph 46 above, H&T also require conditions of consent to be imposed regarding construction activities (to be discussed later in this report), provision and retention of car parking, loading and turning facilities, the gradient off the bus access to be no steeper than 1 in 10 for the first 1.5 metres from the highway boundary and no steeper than 1 in 8 thereafter, and the provision and maintenance of the visibility splays with no obstructions over 0.9 metres

Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

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above the carriageway level. Should members be minded to permit, I consider that the above conditions should be imposed upon the consent.

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

#### Air Quality

60. In addition to the highway impacts of the additional traffic movements associated with the expansion of Trinity School, local residents and Sevenoaks Town Council consider that the air quality along the A25 could also be adversely affected. Given these concerns, and the proximity of the application site to two Air Quality Management Areas (Seal Village and the Bat and Bull Junction (approximately 1Km to the west of the site)) we requested that Sevenoaks District Council consult their Environmental Health Officer for advice on this matter. The applicant was also asked to provide additional information in this regard and an Air Quality Impact Assessment was submitted which concluded that 'the proposed development is unlikely to affect air quality' and that any resulting impacts would be 'insignificant'.
61. However, the District Council consider that insufficient information has been submitted to demonstrate that the increase in vehicle movements resulting from the expansion would not have an impact upon the adjacent Air Quality Management Areas. The District Council's Environmental Health Officer advises that an updated Travel Plan should be submitted pursuant to condition setting out specific measures to encourage more sustainable and less polluting modes of transport and the provision of facilities, such as electric charging points, to promote this. As set out in paragraphs 52 & 53 above, an updated Travel Plan will be required pursuant to planning condition (should permission be granted) and a contribution of £5000 has been secured to aid in the monitoring and implementation of the Travel Plan targets. The purpose of a Travel Plan is to set out specific measures to encourage more sustainable and less polluting modes of transport, as sought by the Environmental Health Officer. The applicant has agreed to investigate the demand for electric charging points at the site as part of the Travel Plan, and I consider that that should be specifically referenced within the Travel Plan condition. Subject to that, and in considering the conclusions of the submitted Air Quality Impact Assessment, I am satisfied that the additional 2FE would not exacerbate any existing air quality matters and would not have an adverse impact on the local Air Quality Management Areas such as to warrant refusing planning permission.



Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

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Design, Heritage and General Amenity Matters

62. Although the impact of the siting and massing of the development on the openness of the Green Belt has been assessed and considered acceptable in that regard, the impact of the proposal on residential amenity also needs to be assessed, in addition to any impact the proposals may have on the character and appearance of the neighbouring Conservation Area.
63. First, with regard to the impact of the proposed development on the Wildernesse Conservation Area which lies to the immediate south of the school boundary, the County Council's Conservation Officer concludes that the proposals would have little impact of the Conservation Area. The school site is well screened from the Conservation Area by hedges and mature trees, and the planning statement confirms the retention of this substantial boundary landscaping. It is concluded by our Conservation Officer that as the proposed extensions to the existing school building would not exceed the existing building height, that the extension design reflects the existing building style, and that the proposals would maintain the existing separation distance between the school buildings and nearest residential properties to the south that the proposals as acceptable on built heritage grounds. In considering the above, I am satisfied that the development would not have an adverse impact on the character and appearance of the Wildernesse Conservation Area.
64. With regard to amenity matters, properties to the south of the site have expressed concerns regarding massing, overlooking, lighting and screening matters with regard to the proposed extensions to the school building. The additional storey extension to the rear of the school building is the closest element of the proposed works to residential properties to the south. It is proposed to add an additional storey onto the existing two/three storey south eastern wing of the school building (the site levels drop from west to east meaning that the west elevation is two storey and the east three storey). The additional storey would increase the height of flat roofed wing by 3.5 metres, to approximately 12.5 metres at the western side and 15.8 metres on the eastern side. However, even with the additional storey, the south eastern wing of the building would not exceed the height of the central core of the building. The building line would extend no closer to the residential properties to the south, which are all over 55 metres away at the closest point (which greatly exceeds the advised 21 metre window to window distance). The existing building in this location is finished in white render, and this would be replicated on the east and west elevations of the additional story extension. However, following a request from a local resident, the southern elevation of the additional storey extension would be finished in dark grey metal composite panels to add some relief to the elevation and reduce the perception of the massing when viewed from properties to the south.
65. With regard to the front extension to the school, this is again well over 50 metres from the side elevation of the closest residential property, and only the top storey of this would be visible from properties to the south due to the existing school buildings. Again, the height of the existing core of the school building would not be exceeded. The fenestration is proposed to match that of the existing building and the footprint of the proposed extension would not extend the building line any further north than the adjacent sports hall. The extension would be finished in white render with dark grey brick work at the ground floor level, to match the material palette of the existing building. In considering above, I am of the opinion that the siting and massing of the proposed

Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

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extensions are in scale with the existing building and in locations that would not alter the overall mass and appearance of the school. I also consider that the massing of the two building extensions would not have a significantly detrimental impact on residential amenity when considering the degree of separation and the siting of the works. The design and material palette would replicate that of the existing building, which would result in a coherent development that would not alter the overall visual appearance of the existing school building. The applicant has provided a significant level of detail within the planning application documentation regarding the external materials, including the exact specifications and colour finishes. I consider that, should permission be granted, a condition of consent should be imposed to ensure that the development is undertaken in accordance with the submitted material details, and that any deviation from the approved specifications would require further approval.

66. In addition to the degree of separation between the school building and residential properties, the southern boundary of the school site is well planted with mature trees and shrub planting. However, it is accepted that additional evergreen planting could be added to that boundary to supplement the screening, and to maintain additional cover in the winter months. I therefore consider that a scheme of landscaping should be submitted pursuant to condition which should include details of tree protection to ensure that boundary planting would not be adversely affected during construction works, and also a planting schedule which must include evergreen planting, amongst other matters. There is no additional lighting proposed to the southern elevation of the school building, but additional lighting may be required to the front of the building. The bus pick-up/drop off zone (to be discussed below) would also require lighting so I consider that details of external lighting should be submitted pursuant to condition, should permission be granted. Subject to those conditions, I am satisfied that the school extensions would not have a detrimental impact on the amenity of neighbouring residents.
67. With regard to the proposed bus drop-off/pick-up area, residents to the north of the A25 consider that the access/exit points would result in the removal of tree and boundary planting, which currently provides screening of the school buildings and existing flood lit pitch. The removal of sections of the boundary line is unfortunate but required to provide not only the access points but the required visibility splays. Given the highway and access benefits that the drop-off/pick-up zone would have (as discussed earlier in this report), on balance the loss of two small sections of boundary planting is considered to be necessary and acceptable in this instance. A large amount of existing boundary planting would be maintained, and the required landscaping details would set out tree protection methods and details of supplementary planting. In addition, details of the lighting required in the bus drop-off/pick-up area are to be submitted for approval to ensure that lighting levels would be acceptable in amenity terms.
68. It should be noted that properties to the north of the A25 are set back from the road frontage, and in some cases properties have tree planting/screening along their front boundaries. The A25 is also lit in this location, so the introduction of lighting in the bus drop-off/pick-up area would not be out of character with the locality. The location of the bus access point was amended during the determination of this application and moved 15 metres to the west so that it was no longer directly opposite a property frontage, but opposite an access point to houses to the north of those directly fronting the A25 (note that the revised location is acceptable to H&T). Having considered the above, I am satisfied that, subject to the submission of a scheme of landscaping and details of

Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

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external lighting, the bus drop-off/pick-up area would not have a significantly detrimental impact on the amenity of local residents.

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

#### Drainage and Land Contamination

70. The Environment Agency and the County Council's Flood Risk Team (SuDs) both raise no objection to this application subject to the imposition of conditions. The Flood Risk Team require the submission of a detailed Sustainable Surface Water Drainage Scheme and the further submission of details of the operation and maintenance of the sustainable drainage scheme. The Environment Agency also require further conditions to control surface water drainage into the ground and to restrict the use of piling and other penetrative foundation design methods. Should permission be granted, the conditions as outlined above would be imposed upon the consent to ensure that drainage of the site was both sustainable and effective.
71. With regard to land contamination, the Environment Agency requests a condition be attached to any consent regarding how works should proceed should any contamination be found during construction. Therefore, should permission be granted, a condition would be imposed covering this matter.

#### Playing Field

72. In addition to the Green Belt implications of the proposed siting of the development, as discussed earlier in this report, the impact of the proposed development on playing field provision also needs to be addressed. Sport England were consulted on this application as the MUGA and, to a lesser degree, the bus drop off loop, would result in the loss in area of amenity grassland which could be considered to form part of the wider playing field. Due to the gradient of the land and the nature of the development proposed, Sport England raise no objection to this application, subject to the submission of a Community Use Agreement prior to occupation. The applicant has agreed to this requirement and, therefore, should permission be granted, a condition of consent would require the submission of a Community Use Agreement.

#### Construction Matters

73. Given that there are nearby residential properties, if planning permission is granted it would, in my view, be appropriate to impose a condition restricting hours construction to protect residential amenity. I recommend that works should be undertaken only between the hours of 0800 and 1800 Monday to Friday and between the hours of 0900 and 1300 on Saturdays, with no operations on Sundays and Bank Holidays. It is also good practice on school sites for contractors to be required under the terms of their contract to manage construction traffic/deliveries to minimise conflict with traffic and pedestrians at the beginning and end of the school day.

Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

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74. I also consider it appropriate that details of a Construction Management Strategy be submitted for approval prior to the commencement of the development. That should include details of the location of site compounds and operative/visitors parking, details of site security and safety measures, lorry waiting and wheel washing facilities, details of how the site access would be managed to avoid peak school times, and details of any construction accesses. Such a strategy would also address the conditions required by Highways and Transportation with regard to the construction of the development. Therefore, should permission be granted, a Construction Management Strategy would be required pursuant to condition and the development would thereafter have to be undertaken in accordance with the approved strategy.

### Conclusion

75. This application seeks the provision of additional accommodation for non-selective secondary education places in the Sevenoaks area by expanding Trinity School by 2FE. The proposal has given rise to a variety of issues, including the need to demonstrate 'very special circumstances' to justify inappropriate development in the Green Belt, the impact of the proposed development on the openness of the Green Belt, and the impact of the development on the highway network, along with a need to ensure that there is a sufficient choice of school places available to meet community needs. I consider that 'very special circumstances' have been demonstrated in this particular case for overriding Green Belt policy considerations. I also consider that the development has been designed to minimise the impact of the development on this part of the Green Belt, and its functioning. In addition, subject to the imposition of the conditions outlined throughout this report, I consider that the proposed development would not have a significantly detrimental impact on the local highway network, or the amenity of local residents, and would accord with the principles of sustainable development as set out in Development Plan Policies and the NPPF. In addition, support for the provision of school places is heavily embedded within the NPPF, the Planning for Schools Development Policy Statement, and local planning policy, and this development would satisfy a required need for secondary school places in the Sevenoaks area.
76. Therefore, subject to the imposition of conditions, I am of the opinion that the proposed development would not give rise to any material harm and is otherwise in accordance with the general aims and objectives of the relevant Development Plan Policies and the guidance contained in the NPPF, and is sustainable development. 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.

### Recommendation

77. I RECOMMEND that the application BE REFERRED to the Secretary of State for HCLG as a departure from the Development Plan on Green Belt grounds, and that SUBJECT TO his decision that PLANNING PERMISSION BE GRANTED SUBJECT TO compliance with the agreed Memoranda of Understanding and conditions, including conditions covering:
- the standard 5 year time limit for implementation;
  - the development to be carried out in accordance with the permitted details;

Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

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- the development to be carried out using the external materials and colour finishes as specified within the planning application documents unless otherwise agreed;
- the submission of a scheme of landscaping, including details of tree protection methods, evergreen planting to the southern site boundary, additional tree planting, soft landscaping, & hard surfacing;
- no tree removal during the bird breeding season;
- the submission of details of external lighting and hours of operation regarding the building extensions and the bus pick-up/drop off zone;
- provision of the bus pick-up/drop off zone with access and egress off the A25 Seal Road within 2 months of occupation;
- pedestrian phase included on the western arm of the A25/Seal Hollow Road junction and dropped kerb crossings provided on Filmer Lane prior to occupation;
- improvements to Public Right of Way numbers SR165 and SU4 between Seal Village and the Seal Road/Seal Hollow Road junction to be undertaken, with funding secured via the MoU;
- best endeavours to implement a Traffic Regulation Order to provide parking restrictions at the junctions of Seal Hollow Road with The Crescent and Hillingdon Avenue with footway improvements at the junction of Hillingdon Avenue/Seal Hollow Road;
- the submission and approval of an updated Travel Plan within six months of occupation, and ongoing 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. The provision of electric charging points, amongst other matters, should be considered within the Travel Plan;
- the provision and retention of car parking, loading and turning facilities;
- the gradient off the bus access to be no steeper than 1 in 10 for the first 1.5 metres from the highway boundary and no steeper than 1 in 8 thereafter;
- the provision and maintenance of the visibility splays with no obstructions over 0.9 metres above the carriageway level.
- the submission and approval of a Community Use Agreement prior to occupation;
- the submission and approval of a detailed Sustainable Surface Water Drainage Scheme and subsequent details of the implementation, maintenance and management of the approved Scheme;
- no infiltration of surface water drainage into the ground other than with the approval of the County Planning Authority;
- Restriction on piling and other foundation designs using penetrative methods;
- measures to control development should land contamination be identified;
- hours of working during construction and demolition to be restricted to between 0800 and 1800 Monday to Friday and between the hours of 0900 and 1300 on Saturdays, with no operations on Sundays and Bank Holidays;
- the submission and approval of a construction management strategy prior to the commencement of the development, including details of the location of site compounds and operative/visitors parking, details of site security and safety measures, lorry waiting and wheel washing facilities, details of how the site access would be managed to avoid conflict with peak school times, and details of any construction accesses;

Proposed 2FE expansion involving two extensions to the existing building and internal alterations, new dedicated drop-off/pick-up bus layby accessed off Seal Road/A25, and external works at Trinity School, Seal Hollow Road, Sevenoaks – SE/18/1726

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

- With regard to the requirement to prepare and submit a (revised/amended) School Travel Plan, the applicant is advised to register with Kent County Council's Travel Plan Management system 'Jambusters' using the following link <http://www.jambusterstpms.co.uk>. Jambusters is a County Wide initiative aiding Schools in the preparation and ongoing monitoring of School Travel Plans.

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