

SECTION D
DEVELOPMENT TO BE CARRIED OUT BY THE COUNTY COUNCIL

Background Documents: the deposited documents; views and representations received as referred to in the reports and included in the development proposals dossier for each case; and other documents as might be additionally indicated.

Item D1

Proposed new build block to accommodate a 1FE expansion, and demolition of existing buildings at St George's CofE School, Meadow Road, Gravesend – GR/19/951 (KCC/GR/0192/2019)

A report by Head of Planning Applications Group to Planning Applications Committee on 4 March 2020.

Application by Kent County Council Education & St Georges CofE School for a new build block to accommodate a 1 Form of Entry expansion to the school, with associated hard and soft landscaping, and demolition of the existing H Block and V Block, at St Georges Church of England School, Meadow Road, Gravesend, Kent DA11 7LS – GR/19/951 (KCC/GR/0192/2019).

Recommendation: Planning permission be granted, subject to conditions.

Local Member: Mr Burden and Dr Sullivan

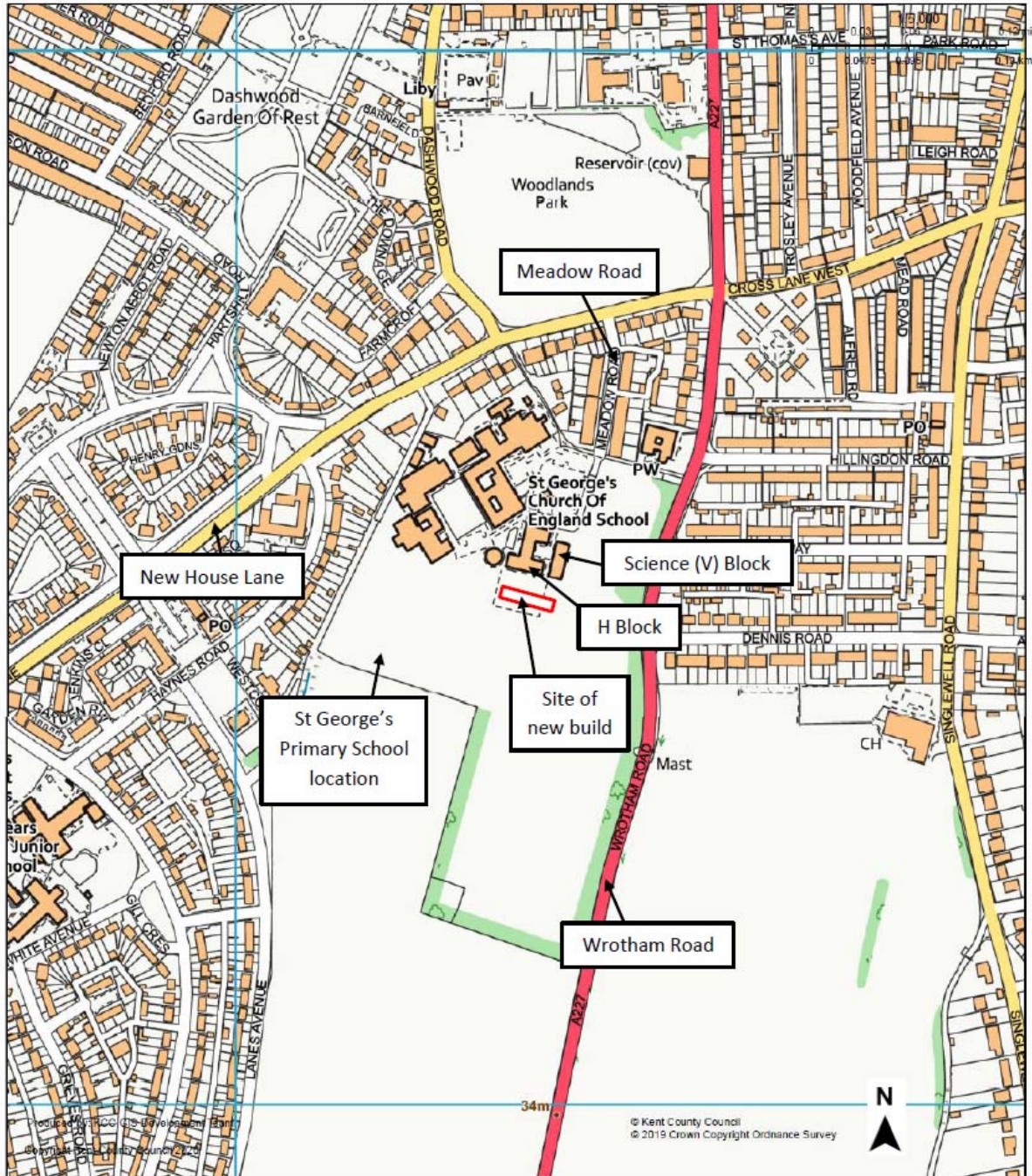
Classification: Unrestricted

Application Site

1. St Georges Church of England (CofE) School is 6 form of entry (FE) secondary school, located approximately a mile to the south of Gravesend Town Centre. The School became an Academy in 2011, but due to the identified educational need to expand this school (see paragraphs 5 & 6) the County Council is the applicant and determining authority in this case. The School is accessed via Meadow Road, a residential street off New House Lane, which provides through access to the school site only. Wrotham Road, a main route into Gravesend Town Centre from the Tollgate A2 junction to the south, runs along the eastern boundary of the School site. A second pedestrian access to the school has recently been opened, via the newly completed Primary School site to the south.
2. The existing school buildings are located to the north west of the site, adjacent to the Meadow Road access, with properties in Meadow Road and New House Lane to the north backing onto the site. Properties in Haynes Road back onto the western site boundary. St Georges CofE Primary School has recently been constructed to the south of the secondary school buildings, on an area that was previously playing field (see paragraph 8). The Primary School has a separate vehicular access via Westcott Avenue, to the south west of the site. Beyond the Primary School, a secure fence line and mature trees and thick scrub form the southern boundary of the educational campus, beyond which lies an open agricultural field which is owned by the County Council. The Secondary School's playing fields occupy the eastern half of the school site, extending the full length of the site from north to south. The playing fields are bordered on all four sides by a line of mature trees.

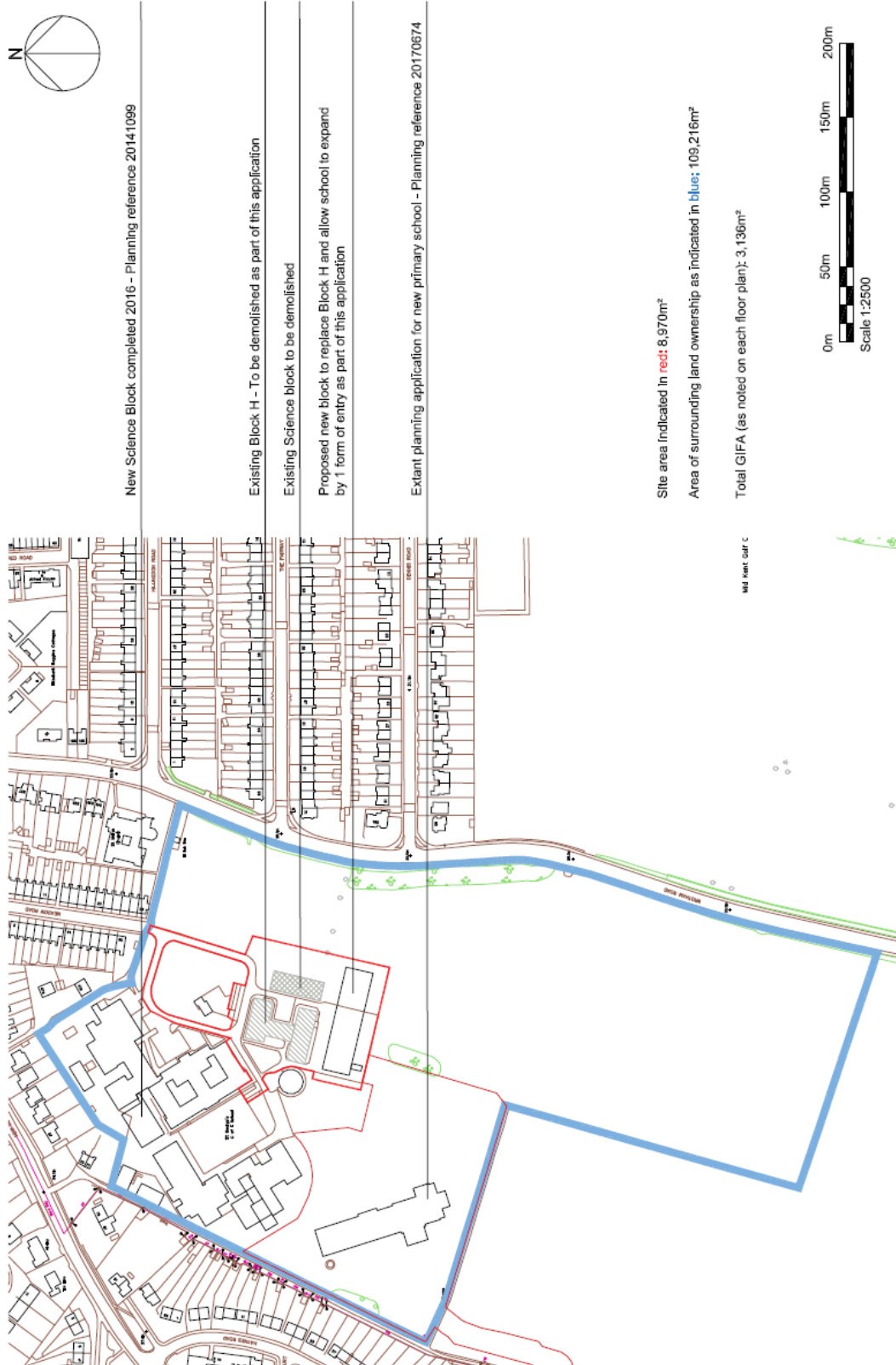
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Site Location Plan



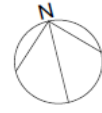
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Existing Site Plan



Proposed new build block to accommodate a 1FE expansion, and demolition of existing buildings at St George's CofE School, Meadow Road, Gravesend – GR/19/951 (KCC/GR/0192/2019)

Existing H Block to be Demolished

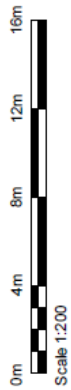
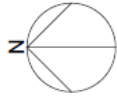


Images of existing block to be demolished

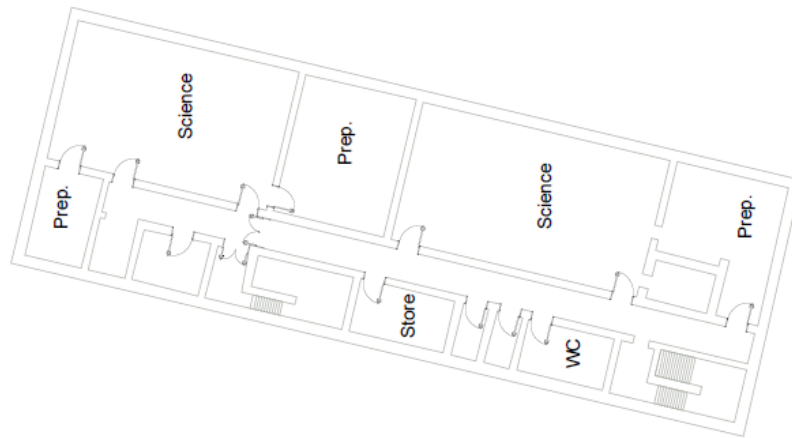


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Existing Science (V) Block to be Demolished

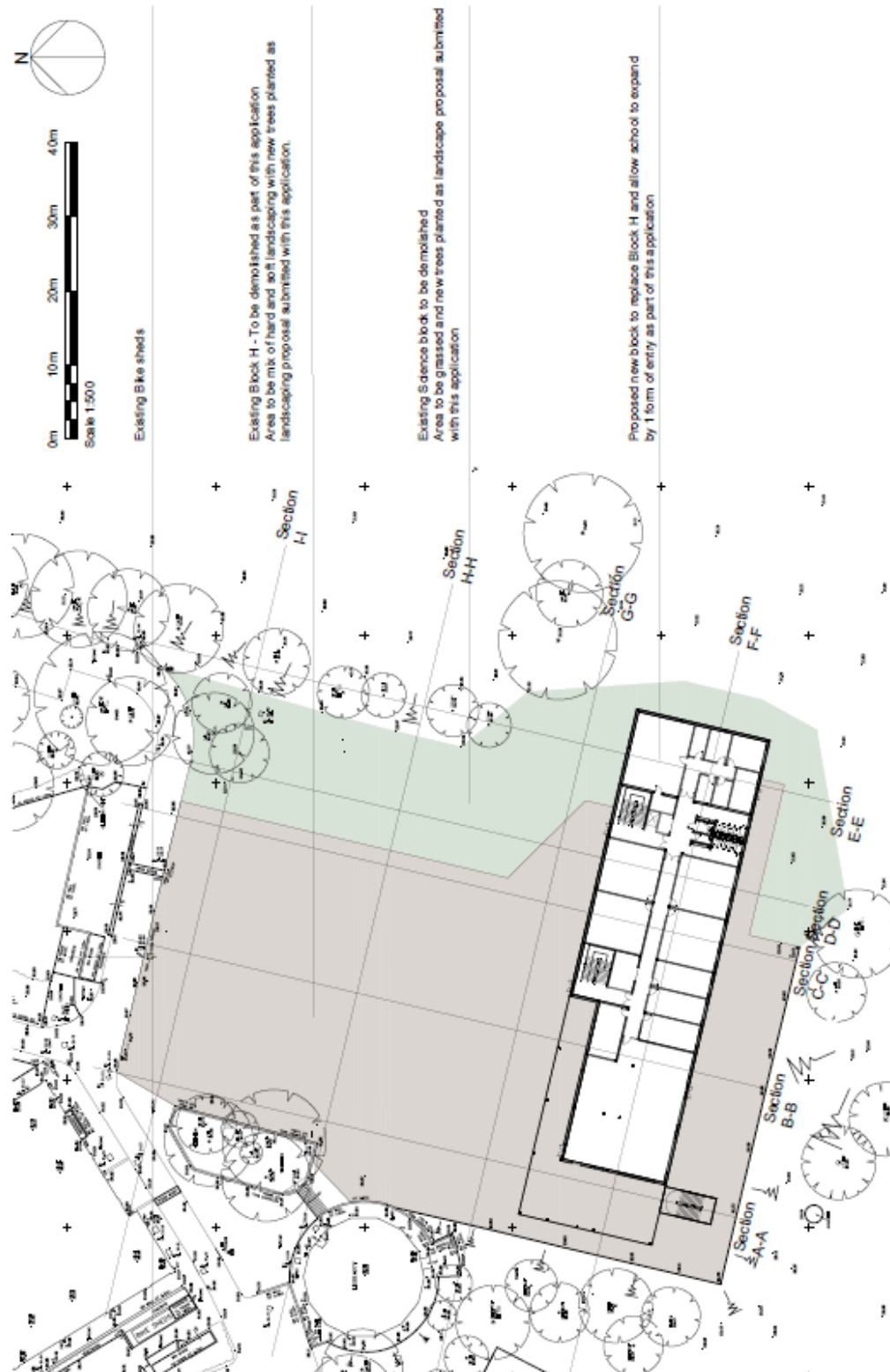


Images of existing block to be demolished



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Proposed Site Plan



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Proposed Elevations/Visualisations



Northern View of New Block



Southern View of New Block

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3. To the south of the School site, beyond the agricultural field owned by the County Council, outline planning permission has been granted by Gravesham Borough Council for the development of a 17.46ha site to provide 400 dwellings and associated infrastructure and access. The planning application, reference GR/20141214 was approved in January 2018. The Borough Council are currently considering various reserved matters and details pursuant to condition applications relating to that application.
4. There are no protected trees within the site, no ecological or landscape designations, and the site is not within a Conservation Area, nor within the setting of any Listed Buildings.

A site location plan is attached.

Background & Need

5. The Kent County Council (KCC) Commissioning Plan for Education Provision in Kent 2020-2024 states that demand for school places within Gravesham continues to exceed capacity. The primary contributory factor in generating that demand is high birth rates, with Gravesham continuing to have birth rates above the National and Kent averages. However, added to that, planned housing growth, such as the housing development to the south of the application site referred to in paragraph 3 above, will further contribute to the deficiencies in secondary school places. Furthermore, that increased demand is showing no signs of reducing over the forecast period.
6. The Area Education Officer has advised that all secondary schools within the Borough (which have the necessary site capacity) are subject to expansion plans to enable the Education Authority (KCC) to meet the existing and future demand. Without the expansion of St Georges as part of that expansion programme, the deficit is unlikely to be fully addressed, which would result in pupils having to travel to schools outside of the borough to access a school place. The Education Officer further advises that St Georges has agreed to admit a 'bulge' Year 7 class for September 2020 to meet demand, which does not require any additional infrastructure. However, without the accommodation proposed in this application, the School could not accommodate an additional form of entry (FE) intake from September 2021 onwards.

Relevant Site History

7. As outlined in paragraph 1 above, St Georges CofE Secondary School became an Academy in 2011, meaning that the County Council is no longer the Planning Authority for the site (as the County Council would not normally be the applicant). Prior to 2011, the County Planning Authority dealt with various applications at the site, the most recent of which was for the retention of two modular buildings in 2008 (GR/08/826).
8. As referenced in paragraph 2 of this report, the County Planning Authority granted planning permission for a '*new build 2 storey 420 place Primary School with car park, playground, floodlit artificial pitch, and associated landscaping with new access road, footpaths, highway improvements (including the widening of Westcott Avenue and the*

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provision of a footpath link to Lanes Avenue) and service connections' on the south eastern section of the secondary school playing field on the 7 December 2017. That application, GR/17/674 (KCC/GR/0165/2017), was considered at the Planning Applications Committee on the 8 November 2017.

9. Following conversion to an Academy in 2011, the Borough Council have determined various applications at the site, most notably the following;
- 20141099 (demolition of existing science (V) block and erection of two storey replacement science block);
 - 20171114 (demolition of existing H block and erection of a two storey building to provide replacement teaching facilities); &
 - 20190054 (demolition of existing H block and erection of a two storey building to provide replacement teaching facilities) *NB. This application amended the design and footprint of the development approved under consent reference 20171114*

It is important to note that none of the above three applications have been implemented.

10. As will be set out below, this application now proposes the demolition of both the existing H and Science (V) block, and replacement accommodation. Additional accommodation is also included within the new building to accommodate the 1 FE expansion required to meet educational need within Gravesham.

Proposal

11. This application proposes a new build block to accommodate a 1 form of entry (FE) expansion to the school, with associated hard and soft landscaping. The demolition of the existing H and V (science) blocks is also proposed, and the applicant advises that both blocks are currently vacant as they are no longer fit for purpose. The School is currently 6FE with a published admission number (PAN) of 180. It is proposed to increase this PAN to 210 (7FE), adding an additional 30 pupils to each year group incrementally, resulting in an eventual capacity of 1050 pupils in years 7 to 11.
12. The H and V (science) blocks are located to the south east of the existing built development on site, as identified on the application drawings/site plan. It is proposed that both of these buildings are to be demolished on completion of the new build, and replacement hard play space and soft landscaping/tree planting be provided under the footprint of these buildings. The proposed new teaching block would be located on an existing area of hard play, to the south of the H and V blocks.
13. The proposed development would result in the removal of 21 individual trees, and the partial removal of a group of trees (2 out of 6). None of these trees are identified as being of high amenity value. A Landscape Strategy is submitted with this application which shows that 34 replacement trees (native and/or wildlife attracting) would be planted on site, in addition to general soft landscaping/shrub planting.
14. The proposed building would accommodate teaching spaces for Maths, English, Music and Media, as well as a 6th Form area, Dance/Drama studio and office space. The building would have a rectangular footprint, orientated east/west, and would be three

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storeys in height for the most part, with two storey accommodation at both the east and western ends of the building. The external materials proposed include a red brickwork plinth, high pressure laminate rainscreen cladding system in red and grey, and dark grey powder coated aluminium windows and doors. The building would have a flat roof.

15. This application does not propose to alter existing vehicular and/or pedestrian access arrangements, and does not propose any additional car parking on site. The applicant advises that the 1FE expansion would result in an additional 2 members of staff. The submitted Transport Assessment states that there are 84 existing car parking spaces on site, comprising formally marked bays and informal areas of hard standing at various locations around the site, and that the this operates under capacity at the moment.
16. The applicant advises that the building has been designed to ensure that the building is energy efficient, incorporating an energy efficient building fabric, a natural ventilation system and other passive measures through the architectural design to reduce energy consumption and carbon emissions beyond what is typical for a new build.

The application is accompanied by a Planning, Design & Access Statement, Transport Statement & Technical Note, Travel Plan, Arboricultural Impact Assessment, Preliminary Ecological Appraisal, Bat Protection Strategy, Ground Investigation Report, Surface Water Drainage/SuDs Assessment, Sustainable Design Report & Education Need Statement.

Planning Policy

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

- (i) **National Planning Policy Framework (NPPF) February 2019** 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:

- achieving the requirement for high quality design and a good standard of amenity for all existing and future occupants of land and buildings;

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- consideration of whether the opportunities for sustainable transport have been taken up and safe and suitable access to the site can be achieved for all people;
- that the planning system contributes to and enhances the natural and local environment;
- meeting the challenge of climate change and flooding and incorporating SuD's;

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 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**

Gravesham Local Plan Core Strategy (2014)

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

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

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

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

Policy CS13 Green Space, Sport and Recreation – States that new development should seek to make adequate provision for and to

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protect and enhance the quantity, quality and accessibility of green space, playing pitches and other sports facilities.

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

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

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

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

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

Consultations

18. **Gravesham Borough Council** raises no objection to this application and comments as follows:

“The Borough Council raises no objection to the principle of the development and would request that Kent County Council determines the application in accordance with the adopted local and national planning policy, and takes into account all the material considerations raised by consultees and third parties.”

Kent County Council Highways and Transportation raise no objection to this application subject to conditions requiring:

- the implementation of the submitted School Travel Plan and adherence to the initiatives set out within it, and ongoing updating, monitoring and review. The Travel Plan must be published and updated via the County Councils 'Jambusters' system;
- the submission of details of parking restrictions at the junction of Meadow Road with New House Lane for the written approval of the County Planning Authority prior to first occupation of the development. The applicant must thereafter make 'best endeavours' to implement a Traffic Regulation Order (TRO) relating to those parking restrictions, with all cost of the TRO borne by the applicant; and

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- no parking of contractors vehicles or any other vehicle associated with the construction of the development within the school staff car park or in Meadow Road.

Highways and Transportation further advise that they attended a meeting with representatives from the School, DHA Transport Consultants (on behalf of the applicant) and Gravesham Borough Council's Highways Development Manager on 5th December 2019 to discuss the concerns that had been raised by local residents and to observe the way the School helps to control vehicle movements in Meadow Road. As a result of the meeting and the opportunity to observe the conditions in Meadow Road at the end of the school day, Highways and Transportation are satisfied that the existing congestion issues in Meadow Road are not significant and that the additional pupil numbers as a result of this application would not significantly exacerbate those issues. The School are also actively managing and monitoring the situation.

Highways and Transportation further note that travel surveys undertaken in 2019 demonstrate that, due to a fairly localised catchment, together with the introduction of a new walking route from the west adjacent to the primary school, that the percentage of pupils arriving (33%) and departing from school (26%) by car is relatively low and this could be improved by the implementation of the School Travel Plan which has been submitted as part of this application and approved by KCC's School Travel Plan Advisor.

The County Council's School Travel Plan Advisor raises no objection to this application and has approved the submitted School Travel Plan via the County Council's online 'Jambusters' system.

Sport England raises no objection to the application. The proposal is considered to meet Sport England's 'exception 3' of their playing fields policy in that the proposed development would affect land incapable of forming part of a playing pitch and does not adversely affect existing playing field/sports provision.

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

The County Council's Biodiversity Officer raises no objection to this application and is satisfied that sufficient ecological survey work has been undertaken to demonstrate that protected species would not be affected by the proposed development, subject to a condition requiring the submission and written approval of a detailed Bat Mitigation Strategy prior to any works commencing on the demolition of the H & Science (V) block.

The Bat Mitigation Strategy must include the following, and be implemented as approved:

- Bat emergence surveys
- Overview of mitigation required
- Detailed methodology to implement mitigation

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- Timings of the proposed works (including confirmation from the School that the timings are acceptable)
- Details of bat roosts to be incorporated into the site if not required for mitigation (in the event that bats are not recorded roosting).

The County Council's Biodiversity Officer further advises that the buildings to be demolished have been assessed as having high potential for bats and that at least 3 bat emergence/dawn re-entry surveys would normally be expected to have been carried out on the buildings and a report submitted with the planning application. As these were not undertaken, and it is now not the appropriate season to undertake such surveys, to enable the applicant to demonstrate the appropriate mitigation could be carried out a worst-case scenario mitigation strategy has been submitted.

The County Council's Biodiversity Officer highlights that it is recommended that necessary surveys are carried out prior to determination to ensure that the County Council can fully understand the impact a proposed development would have on roosting bats. However, in this case, the Biodiversity Officer advises that the submitted worse-case scenario mitigation strategy does demonstrate that appropriate mitigation could be implemented within the site if planning permission is granted. Therefore, no objection is raised, subject to the submission of a detailed Bat Mitigation Strategy before demolition works commence.

The County Archaeologist no comments received to date.

The County Council's Flood Risk Management Team (SuDs) raises no objection to the application and considers that the submitted Sustainable Surface Water Drainage Scheme is acceptable. However, a condition of consent is required to secure the submission and approval of a Verification Report regarding the Surface Water Drainage Scheme prior to occupation of the development.

Local Member

19. The local County Members, Mr J Burden and Dr L Sullivan, were notified of the application on 9 September 2019. No views have been received to date.

Publicity

20. The application was publicised by an advertisement in a local newspaper, the posting of 3 site notices and the individual notification of 123 residential properties.

Representations

21. In response to the publicity, 8 letters of representation have been received from 7 local residents. A summary of the main planning issues raised/points of objection is set out below:
- No objection is raised to the building itself;
 - Support is expressed for the need to increase available school places;

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- The application refers to Years 7 to 11 only, what about sixth form numbers?
- The application refers to just 2 additional members of staff, how can that be correct?
- Concern is raised regarding additional school traffic in Meadow Road - which is the only vehicular access/egress from the school;
- Meadow Road is a narrow residential road with on street parking and no turning space, leading straight into the school site. With parking on both sides of the road, the carriageway becomes single track;
- Residents already experience issues with parking and access at peak school times;
- Parents parking on New House Lane obscure visibility for those turning in/out of Meadow Road;
- Concerns are expressed that emergency vehicles would not be able to access Meadow Road at peak school times;
- Pupils walk and cycle in local roads, which is dangerous;
- The school claim that they have a policy to stop parents using Meadow Road for pick-up/drop-off. The school may ask in letters to parents but this is not enforceable on a public road;
- Construction vehicles should not use Meadow Road – an alternative access must be found. Previous use of Meadow Road for construction access resulted in a collapsed gas main and damage to parked cars;
- An alternative permanent entrance to the school should be proposed, via Wrotham Road or the new housing development to the south for example;
- Parking controls should be introduced on Meadow Road; and
- Increased parking should be provided on the school site;

Discussion

Introduction

22. In considering this proposal regard must be had to the Development Plan Policies outlined in paragraph 19 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.
23. In this case the key determining factors, in my view, are the principle of the development and need, access and highway matters, design, massing and siting including landscaping matters, general amenity matters, and the policy support for the development of schools to ensure that there is sufficient provision to meet growing demand, increased choice and raised educational standards, subject to being satisfied on other material considerations.

Principle of the Development/Need

24. As outlined in paragraph 17 of this report, great emphasis is placed within planning policy generally, specifically paragraph 94 of the NPPF, on the need to ensure that a

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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. Further, Gravesham Local Plan Core Strategy (2014) Policy CS10 states that support will be given to proposals that protect, retain or enhance existing physical and social infrastructure, including schools.

25. Kent County Council, as the Strategic Commissioner of Education Provision in the County, is responsible for ensuring that there are sufficient school places of high quality for all learners. As set out in paragraphs 5 & 6 of this report, the Kent County Council (KCC) Commissioning Plan for 2020-2024 states that demand for school places within Gravesham continues to exceed capacity. The primary contributory factor in generating that demand is high birth rates, with Gravesham continuing to have birth rates above the National and Kent averages. However, added to that, planned housing growth will further contribute to the deficiencies in secondary school places. Furthermore, that increased demand is showing no signs of reducing over the forecast period.
26. The Area Education Officer has advised that all secondary schools within the Borough (which have the necessary site capacity) are subject to expansion plans to enable the Education Authority (KCC) to meet the existing and future demand. Without the expansion of St George's as part of that programme, the deficit is unlikely to be fully addressed, which would result in pupils having to travel to schools outside of the district to access a school place. The Education Officer further advises that St George's have agreed to admit a 'bulge' Year 7 class for September 2020 to meet demand, which does not require any additional infrastructure. However, without the accommodation proposed in this application, the school could not accommodate an additional FE intake from September 2021 onwards.
27. Based on the above, in my view, it is evident that there is a clear case of need for additional secondary school places within the Gravesham Borough. The applicant has demonstrated a need for school places which will be 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. I therefore accept the need for the expansion of St George's CofE School, subject to being satisfied on the relevant material considerations set out below.

Access and Highway Matters

28. As set out in paragraph 21 of this report, the 8 letters of representation received raise objection to this application on the grounds of access and highway matters, specifically concerns regarding additional traffic using Meadow Road (both construction traffic and

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resulting school traffic upon completion), increased parking and congestion on local roads, highway safety and the need for an alternative school access.

29. As set out in paragraph 1 of this report, the school site is accessed via Meadow Road, a residential street off New House Lane, which provides through access to the school site only. Meadow Road is a residential street, with on street parking to both sides of the road, resulting in a single width main carriageway. A second pedestrian access to the school has recently been opened, via the newly completed Primary School site to the south. This application is not proposing any changes to the existing access arrangements to the site, and no additional on-site car parking is proposed. The applicant advises that the 1FE expansion would result in an additional 2 members of staff due to changes in class sizes, and an additional pupil capacity of 150 in years 7 to 11, resulting in an eventual capacity of 1050 pupils (years 7 to 11).
30. This application is accompanied by a Transport Assessment (TA), a TA Technical Note and a School Travel Plan. Before discussing the points of objection raised by local residents it is important to note that Kent County Council Highways and Transportation (H&T) raise no objection to this application, subject to conditions regarding the implementation of the School Travel Plan, the provision of parking restrictions at the Meadow Road/New House Lane junction and parking limitations for vehicles associated with construction (see below for more detail). It should also be noted that the submitted School Travel Plan has been approved by the County Council's School Travel Plan Advisor via the County Council's online Jambusters System.
31. The submitted Transport Assessment states that there are 84 existing car parking spaces on site, comprising formally marked bays and informal areas of hard standing at various locations around the site, and that this operates under capacity at the moment. Although the proposed 1 FE expansion would result in an additional 150 pupils in years 7 to 11, as stated above, the applicant advises that just 2 additional members of staff would be required. The applicant states that currently in years 8 to 11 the school have 8 classes for the 180 (6FE) pupils per year group, which equates to about 22/23 pupils per class. In year 7, there are 7 classes for the 180 pupils. The School propose to keep the same number of classes in years 8 to 11 but to increase class sizes to 26/27 pupils per class to accommodate the additional 30 pupils in each year group. The School would need to add an additional class to year 7 to bring the total number of classes in that year group up to 8 to accord with years 8 to 11. The applicant advises that that extra class would have a requirement for 1 additional teacher only. Further, an additional teacher would be required for years 9 to 11 to cover the GCSE options classes. This would bring the total number of additional staff up to 2. I have sought clarification with regard to support staff and have been advised by the applicant that the School would not need any additional full or part time staff in that regard.
32. Given this information, H&T are satisfied that the additional 2 staff parking spaces required as a direct result of this application could be accommodated within the existing provision onsite as the 84 spaces are currently not all used. Given the assurances provided by the applicant with regard to staff numbers, and the views of H&T, I am satisfied that this application would not result in additional parking pressures on local roads as a result of the increased staff and pupil numbers associated with the expansion.

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33. However, concern has also been raised by local residents regarding the use of Meadow Road and other local roads by school traffic, mainly parents dropping off and picking up pupils at the start and end of the school day. The School states that they do encourage parents not too use Meadow Road for pick-up and drop-off and, given the restrictive nature of the road with regard to limited parking, single track carriageway and lack of turning area, I would consider its appeal to parents to be limited. That being said, some parents do use Meadow Road and other local roads for pick up and drop off, and it is accepted that, at times, that must be a nuisance for local residents and cause congestion and access issues. However, in this instance, we need to assess whether the proposed expansion would exacerbate these existing concerns to a level that would warrant refusal of the application.
34. As noted in paragraph 30 above, this application is accompanied by a Transport Assessment (TA), a TA Technical Note and a School Travel Plan. H&T have assessed the content of these documents and, in addition, have attended a meeting on site with representatives from the School, the applicant's Transport Consultants and Gravesham Borough Council's Highways Development Manager to discuss the concerns that have been raised by local residents and to observe the way the School helps to control vehicle movements in Meadow Road. As a result of that meeting and the opportunity to observe the conditions in Meadow Road at the end of the school day, H&T are satisfied that existing congestion issues in Meadow Road are not significant and that the additional pupil numbers as a result of this application would not significantly exacerbate any existing highway, access and/or parking concerns such that refusing planning permission is justified. Further, H&T consider that the School are also actively managing and monitoring the situation, although it is recognised that if parents are parking legally and safely the school cannot require them to park elsewhere.
35. Local residents have suggested that parking restrictions should be introduced on Meadow Road to prevent parents from parking at peak school times. Having considered this, H&T advise that this is not necessary given the fact that they do not consider the existing and/or proposed access and parking arrangements to be a significant cause of concern. However, the issue of parents parking dangerously, on the corner of Meadow Road/New House Lane has been identified as a potential highway safety concern by local residents. As a result of these concerns, H&T recommend that a condition should be imposed, should permission be granted, which would require the submission of details of parking restrictions at the junction of Meadow Road with New House Lane prior to first occupation of the development. The applicant must thereafter make 'best endeavours' to implement a Traffic Regulation Order (TRO) relating to those parking restrictions, with all costs of the TRO borne by the applicant (the School/KCC Education). Subject to the imposition of this condition, and considering the views of H&T, I am satisfied that parking on the local highway by parents at peak school times would not have an undue impact on highway safety, and that further parking restrictions are not deemed necessary at this time.
36. Meadow Road is the only vehicular access into the school site, and it has been suggested by local residents that an alternative access into the site should be provided. First, it is important to note that the recently completed Primary School to the south of the site does have a pedestrian link into the Secondary School site, which does spread

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pedestrian access and aid in reducing the number of pupils using Meadow Road. There is also a pedestrian link from Wrotham Road to the school access at the south of Meadow Road, again reducing the number of pupils using Meadow Road for access. However, the provision of an alternative vehicular access has been raised with H&T and the applicant and it is considered that, in this instance, as H&T are satisfied with the existing vehicular access arrangements (subject to conditions), that there is no justification or requirement for the applicant to provide an alternative. In addition, such an alternative access would require the addition of a new vehicular access onto Wrotham Road which may not meet with approval from H&T as it is a main route into Gravesend from the A2. In addition, due to level changes a significant amount of earth works would be required, in addition to a loss of mature boundary trees and a loss of land used as playing field. Given that H&T are satisfied with the existing access arrangements at this site, and the subsequent lack of a highways objection to this application, and the other planning issues that an additional access would create, I see no justification to pursue this matter further at this time.

37. Highways and Transportation further note that the submitted School Travel Plan includes travel surveys undertaken in 2019. Those surveys demonstrate that, due to a fairly localised catchment area of the School, together with the introduction of the new walking route from the south via the primary school, that the percentage of pupils arriving (33%) and departing from school (26%) by car is relatively low and this could be improved by the implementation of the School Travel Plan. It should be noted that the submitted School Travel Plan has been approved by the County Council's School Travel Plan Advisor via the Jambusters system. However, should permission be granted, H&T consider that a condition of consent should be imposed requiring the implementation of the submitted School Travel Plan and adherence to the initiatives set out within it, and ongoing updating, monitoring and review. Further, the Travel Plan must be published and updated via the County Council's 'Jambusters' system. I consider that the imposition of this condition would further aid in reducing the number of pupils travelling to school by car by ensuring that the Travel Plan and its targets are regularly reviewed and updated, and by making the Travel Plan available for public viewing resulting in the School having to be accountable to its contents. Therefore, should permission be granted, the above condition should be imposed upon the consent.
38. Lastly, concern has also been raised regarding the suitability of Meadow Road as a construction access. This will be discussed later in this report, although I note that the access has been used for previous construction activities at the site (albeit residents advise that cars and the road were damaged) and that H&T would only agree to Meadow Road being used as a construction access if they were satisfied with the applicants construction proposals. Although a permanent alternative vehicular access into the site is not justified or required as a result of this application, as discussed above, if H&T were not satisfied that Meadow Road could be used safely by vehicles associated with construction activities, an alternative temporary construction access would be required.
39. In summary, H&T, as the Highway Authority, do not consider that the impact of the school expansion is likely to lead to "severe" highway safety or congestion problems, although it is accepted that, as with any school, some local disruption may result but this

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is of short duration and during term time only. In considering the above, and in light of the views of H&T, I consider that subject to the imposition of conditions regarding the implementation of the submitted School Travel Plan and adherence to the initiatives set out within it, and the submission of details of parking restrictions at the junction of Meadow Road with New House Lane prior to first occupation of the development, with the applicant thereafter making 'best endeavours' to implement a Traffic Regulation Order (TRO) relating to those parking restrictions, that overall the development would not have a significantly detrimental impact overall on the local highway network. I therefore see no overriding reason to refuse this application on highway and access grounds.

Design, Massing and Siting including General Amenity Matters, Sustainable Design and Landscaping

40. Whilst the design, massing and siting of the built development as proposed has not met with objection, these matters do require consideration in the determination of this application. The NPPF sets out guidance and objectives for development proposal, and includes a requirement for a high quality design and a good standard of amenity for all existing future occupants of land and buildings. Further, Gravesham Local Plan Core Strategy (2014) Policy CS19 sets out development and design principles, and states that new development must conserve and enhance the character of the local built, historic and natural environment. In my view, the proposed teaching block is proposed in a location that would not impact upon residential amenity due to the degree of separation and the significant level of screening from existing buildings and proposed/existing landscaping. The siting of the accommodation is, in my view, logical and practicable, and I am satisfied that the built development as proposed would not significantly adversely affect local amenity and/or the wider landscape.
41. With regard to the design of the building, the applicant advises that the design has been based on a robust analysis of the character and existing context of the site, including the eclectic mix of existing built form on the school site. The development would result in the demolition of two existing buildings which are of very limited architectural merit and are no longer fit for purpose, hence they are currently not used by the school. As set out in paragraph 9 of this report, Gravesham Borough Council have approved previous applications for the demolition and replacement of these building, so the principle of the replacement of these substandard buildings has been tested through the planning process and accepted. Further, the proposed new building would meet the space requirements of the modern curriculum and would arguably be of greater architectural merit than the buildings being replaced.
42. As set out in paragraph 14 of this report, the external materials proposed include a red brickwork plinth, rainscreen cladding in red and grey, and dark grey powder coated aluminum windows and doors. Although acceptable in principle, in my view, it would be appropriate to seek further and final details of all materials to be used externally pursuant to condition, should permission be granted. Subject to the imposition of that condition, I do not consider that the design of the building would have a significantly detrimental impact upon the appearance or amenity of the locality and, therefore, would be acceptable.

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43. The applicant advises that sustainable design has been integrated into the building concept. As set out in paragraph 16, the applicant advises that the building has been designed to ensure that the building is energy efficient, incorporating an energy efficient building fabric, a natural ventilation system and other passive measures through the architectural design to reduce energy consumption and carbon emissions. Whilst we would normally expect an array of solar panels/PVs on a new building with a flat roof on a school site to help meet the developments sustainability credentials, we have undertaken considerable dialogue with the applicant regarding this matter and they have advised that their inclusion would have 'significant financial implications' and that the building meets its sustainability objectives in terms of the other design features referred to above. Nonetheless, the applicant is now considering the inclusion of some solar panel/PV provision into the project. I am continuing to maintain dialogue with the applicant regarding the potential provision of solar panels/PVs on this site and I will update the Committee further on this matter at the meeting.
44. As set out in paragraph 13 of this report, the proposed development would result in the removal of 21 individual trees and the partial removal of a group of trees (2 out of 6), none of which are identified as being off high amenity value. The application documentation includes detailed landscaping proposals which identify the location for the planting of 34 replacement/additional trees, all of which would be native and/or wildlife attracting, including species to attract bees. Additional details of hard and soft landscaping, such as the inclusion of unmown areas for wildlife habitat, and the surfacing of the proposed playground area following the demolition works, are also provided. Tree protection details are also included within the application documentation. Given the above, I am satisfied that the application documentation includes sufficient information regarding proposed landscaping and also protection of trees to be retained. However, should Members be minded to grant permission, I would recommend that conditions of consent be imposed to ensure that the development is undertaken in accordance with the submitted details, and that any deviation from the approved landscaping specification would require further approval.

Biodiversity

45. With regard to ecology and biodiversity matters, a Preliminary Ecological Appraisal and 'worst case scenario' Bat Mitigation Strategy have been submitted in support of this application. As set out in paragraph 18 of this report, the buildings proposed to be demolished (H and Science 'V' block) have been assessed as having high potential for bats and that at least 3 bat emergence/dawn re-entry surveys would normally be expected to have been carried out on the buildings and a report submitted with the planning application.
46. Although it is recommended that necessary ecological surveys are carried out prior to determination of an application to ensure that the impact of a proposed development on protected species can be fully understood, in this case, the County Council's Biodiversity Officer advised that a worse-case scenario mitigation strategy could be submitted. This was due to the fact that the required bats surveys were not undertaken prior to the submission of the application, and it is now not the appropriate season to undertake such surveys. The worse-case scenario mitigation strategy was therefore required to enable

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the applicant to demonstrate that appropriate mitigation could be carried out following the post decision completion of the necessary surveys, should permission be granted.

47. The County Council's Biodiversity Officer consider that the worse-case scenario mitigation strategy does demonstrate that appropriate mitigation could be implemented within the site if planning permission is granted. Therefore, no objection is raised, subject to the submission of a detailed Bat Mitigation Strategy before demolition works commence on the H & Science (V) block.

The Bat Mitigation Strategy must include the following, and be implemented as approved:

- Bat emergence surveys
- Overview of mitigation required
- Detailed methodology to implement mitigation
- Timings of the proposed works (including confirmation from the schools that the timings are acceptable)
- Details of bat roosts to be incorporated into the site if not required for mitigation (in the event that bats are not recorded roosting).

48. In addition, I consider that a further condition of consent should be imposed to ensure that there is no tree removal during the bird breeding season, unless supervised by a suitably qualified ecologist. Subject to the imposition of the conditions outlined above, I am of the view that the development would not have a detrimental impact upon ecology/biodiversity interests

Drainage and Land Contamination

49. 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 consider that the submitted Sustainable Surface Water Drainage Scheme is acceptable and require no further details to be submitted prior to commencement of the development. However, a condition requiring the submission and approval of a Verification Report regarding the approved Sustainable Surface Water Drainage Scheme prior to occupation of the development is required. The Environment Agency also require a condition to control surface water drainage into the ground. 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.

50. 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.

Construction Matters

51. Given that there are neighbouring residential properties, if planning permission is granted it would, in my view, be appropriate to impose a condition restricting hours of demolition and construction to protect residential amenity. I recommend that works should be undertaken only between the hours of 0800 and 1800 Monday to Friday and

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between the hours of 0900 and 1300 on Saturdays, with no operations on Sundays and Bank Holidays.

52. The applicant has submitted a Construction Management Strategy for consideration in the determination of this application. H&T have assessed the information included within this strategy, which includes details of site set up and location of the construction compound, details of how construction activities would be managed to avoid peak school times, and tracking information demonstrating that construction vehicles could safely use Meadow Road, amongst other matters. H&T are satisfied with the submitted information and have accepted that Meadow Road could be used safely by vehicles associated with the construction of the development. I am therefore satisfied that, in this instance, further details relating to construction management are not required to be submitted pursuant to condition. However, should permission be granted, I consider that a condition of consent should be imposed requiring the construction of the development to be carried out in strict accordance with the submitted Construction Management Strategy. Further, as recommended by H&T, a further condition should be imposed to ensure that all contractors vehicles and other vehicles associated with the development (construction and demolition) do not park within the school staff car park or in Meadow Road. Subject to the imposition of the conditions outlined above, I am satisfied that the construction of the development would not have a significantly detrimental impact on the local highway network or the amenity of the locality.

Conclusion

53. This application seeks the provision of additional accommodation for secondary education places in the Gravesham area by expanding St George's Church of England School by 1FE. The proposal has given rise to a variety of issues, including the impact of the development on the local highway network, general amenity impact, design and sustainability matters, and the need to ensure that there is a sufficient choice of school places available to meet community needs. In my view, the development would not give rise to any significant material harm and is in accordance with the general aims and objectives of the relevant Development Plan Policies. The development is in accordance with the principles of the National Planning Policy Framework and the Planning Policy Statement for Schools (2011). Subject to the imposition of the conditions outlined throughout this report, I consider that the proposed development would not have a significantly detrimental impact on the local highway network, the amenity of local residents and other material considerations, and would accord with the principles of sustainable development as set out in 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 Gravesham area. Therefore, I recommend that permission be granted subject to appropriate conditions.

Recommendation

54. I RECOMMEND that PERMISSION BE GRANTED, SUBJECT TO the imposition of conditions covering (amongst other matters) the following:
- a 3 year time limit for implementation;

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- the development to be carried out in accordance with the permitted details;
- the submission and approval of all materials to be used externally;
- landscaping scheme, including additional tree planting, soft landscaping, hard surfacing, and ecological enhancements to be provided in accordance with the submitted details unless otherwise agreed;
- tree protection methods, as shown on the submitted drawings, to be adopted to protect trees to be retained;
- the submission of a detailed Bat Mitigation Strategy before demolition works commence on the H & Science (V) block.
- no tree removal during the bird breeding season;
- the implementation of the submitted School Travel Plan and adherence to the initiatives set out within it, and ongoing updating, monitoring and review. The Travel Plan must be published and updated via the County Councils ‘Jambusters’ system;
- the submission of details of parking restrictions at the junction of Meadow Road with New House Lane for the written approval of the County Planning Authority prior to first occupation of the development. The applicant must thereafter make ‘best endeavours’ to implement a Traffic Regulation Order (TRO) relating to those parking restrictions, with all cost of the TRO borne by the applicant;
- the submission and approval of a Verification Report regarding the approved Sustainable Surface Water Drainage Scheme prior to occupation of the development;
- no infiltration of surface water drainage into the ground other than with the approval of the County Planning Authority;
- measures to control development should land contamination be identified;
- hours of working during construction and demolition to be restricted to between 0800 and 1800 Monday to Friday and between the hours of 0900 and 1300 on Saturdays, with no operations on Sundays and Bank Holidays;
- the construction of the development to be carried out in strict accordance with the submitted Construction Management Strategy;
- all contractors vehicles and other vehicles associated with the development (construction and demolition) must not park within the school staff car park or in Meadow Road.

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

- The applicant’s attention is drawn to the letter from Highways and Transportation in which it is noted that it is the responsibility of the applicant to ensure that all necessary highway approvals and consents where required are obtained, including a Traffic Regulation Order.
- The applicant’s attention is drawn to the letter from the Environment Agency in which advice is provided with regard to the disposal of waste material;

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