

2. Reason for reporting to Committee:

2.1 The application site is located in the Green Belt.

3. The Sites:

3.1 The existing site of the school at Leybourne Grange is characterised by 30 year old buildings, which have now become unsuitable for the school's purpose. There is insufficient space on the site to redevelop the school in a way that would meet contemporary needs. The surrounding area of Leybourne Grange is to be comprehensively redeveloped for a new residential community.

3.2 The application site lies to the north of the existing Wrotham Secondary School buildings between those buildings and the the M26. The site lies within the Metropolitan Green Belt and an Area of Outstanding Natural Beauty.

3.3 The A227 lies to the west of the site and open playing fields used by Wrotham School lie to the east of the site. The site is open mown grassland and the applicant advises that the space is surplus to requirements.

3.4 Access to the site is from the A227, from the northern of the two main entrances to Wrotham School. Access to the M26 and M20 are close-by, to the north, allowing good accessibility on the strategic network.

4. Planning History:

TM/08/02835/CCEASC screening opinion EIA not required 8 September 2008

Request for screening opinion under Regulation 7 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 for Proposed Development: Erection of a new special school, parking, play area, landscaping and ancillary works (KCC reference TM/08/Temp/0056)

5. Consultees:

5.1 Consultations carried out by KCC. Copies of the following responses have been received by TMBC:

5.1.1 Borough Green PC: Whilst we recognise that we are not experts in autism, there is some concern about the design of the school and its position on the site. My members fear that the building will capture the traffic noise from the extremely busy A227 on which it is located, which may be detrimental to young people.

5.1.2 With this in mind, it is felt that consideration should be given to changing the position/ location of the building within the site – to mitigate the effect of its shape “collecting” the noise generated by traffic passing on the A227.

5.2 Highways Agency: No objection.

- 5.3 EA: No objection, subject to conditions.
- 5.4 Natural England: No comment, subject to recommendations.
- 5.5 DHH: Although the site chosen for the proposed school is the noisiest in terms of noise from the M26 and A227, the design of the school and proposed mitigation measures, are such that the application indicates that the teaching rooms comply with the relevant standards in Building Bulletin 93 'Acoustic Design of Schools' (BB93). This outcome rests on the successful inclusion of appropriate glazing and acoustically treated louvered passive ventilation to the teaching rooms. I therefore recommend that these requirements be included as a condition of any permission granted, to ensure internal noise levels in teaching rooms achieve the 35dB Laeq T level required in BB93.
- 5.5.1 On the matter of Air Quality, the site does not fall within an AQMA, nor is there any known issue with air quality in the area. Dust from nearby quarry workings may be an issue (although no complaints in that area have been received), however should the problem arise, it can be controlled by means of enforcing planning conditions for those sites.

6. Determining Issues:

- 6.1 This is a case for KCC to determine and this Council has the role of consultee.
- 6.2 Saved policy P6/22 of the Tonbridge and Malling Borough Local Plan 1998 (TMBLP) states that new community facilities in the countryside will be permitted provided it can be demonstrated that no alternative accommodation is available within the urban area or villages, or through the re-use of existing buildings. A report has been submitted that sets out the other potential sites identified for the school and the reason for them being dismissed.
- 6.3 The site of the existing school lies within the open countryside and Metropolitan Green Belt.
- 6.4 Policy QL1 of the KMSP and Policy CP1 of the Tonbridge and Malling Borough Core Strategy 2007 (TMBCS) requires all proposals for new development to result in a high quality sustainable environment.
- 6.5 Within the Metropolitan Green Belt there is a general presumption against inappropriate development, as set out in PPG 2: Green Belts, policy SS2 of the KMSP 2006 and policy CP3 of the TMBCS. A Green Belt report has been submitted with the application, which demonstrates that alternative approaches to avoid development on Green Belt land have been examined, including the complete closure of the school, to do nothing and remain on the existing site, on-site refurbishment and the consideration alternative sites that would avoid Green Belt land. Within Wrotham School three alternative locations have been considered.

- 6.6 Policy EN4 of the KMSP and Policy CP7 of the TMBCS seek to protect the AONB from development that would be detrimental to the natural beauty and enjoyment of the landscape. The applicant suggests that the proposed design and the location of the development, to the north of the M26, would ensure that the landscape impact is minimised.
- 6.7 Policy SS8 of the KMSP states that non-residential development in the countryside should provide a facility for which a rural location is justified. Policy CP14 of the TMBCS restricts development within the countryside to development that requires a rural location.
- 6.8 The proposal involves relocating an existing school, and therefore at a strategic level there is unlikely to be a greater impact upon the MGB or countryside.
- 6.9 The site is part of an existing education complex and I am of the opinion that the impact on the countryside has been kept to a minimum. The two schools will benefit from being able to operate a degree of integrated curriculum provision. This will mean that there will be a reduction in the number of movements off of the site than currently exist at Leybourne Grange, with the need to transport pupils to other schools will be significantly reduced.
- 6.10 Details of potential alternative sites have been submitted with the proposals within a Search Report. This sets out the search criteria, in terms of the required land. Seven sites were considered within the search area but have been dismissed for a variety of reasons concerning suitability, location, impact and practical availability. Three sites were considered outside of the primary search area. However, these were too large and a considerable distance from the current school, which would result in problems for children and staff travelling to the school. A number of County Council owned sites were also considered but were either committed to another purpose or in an inappropriate location in terms of the location of existing schools and countryside impact.
- 6.11 Policy EN8 of the KMSP seeks to protect, conserve and enhance biodiversity through evaluation of nature conservation on development sites. A Nature Conservation and Arboricultural Assessment has been submitted. This concludes that habitats with the potential to support various reptile species were located and therefore further surveys were recommended. Depending upon these findings it was recommended that population estimates and mitigation measures may be required (i.e. Creation of compensatory habitat, translocation/ relocation of individuals). A Great Crested Newt Survey was submitted with the application concluding that great crested newts were found in ponds that exist on the other potential areas that were considered for the school location.
- 6.12 Policy CP24 of the TMBCS seeks to achieve high quality design within proposals.

- 6.13 The proposed building will be well located in terms of the degree of visual impact on the locality and its form will mean that the visual impact is reduced as far as practicable. The design of the proposed building incorporates a grass roof which is an important design feature to minimise the impact of the development when viewed from the North Downs. The main local view of the building will be from Borough Green Road next to the school, which will not be adverse to the wider landscape. The landscape strategy to integrate the new building into its surroundings is sound, concentrating on native planting.
- 6.14 Policy TP3 of the KMSP states that new development should be well served by public transport, with travel plans developed where appropriate. Policy TP12 of the KMSP requires access to development sites to remain adequate in highway safety terms. Policy CP25 of the TMBCS states that development will not be approved unless the service, transport and community infrastructure necessary to serve it is available or will be made available.
- 6.15 By being located adjacent to the existing secondary school, traffic movements are concentrated in the same destination location. There is adequate parking proposed for the scale of the school. A transport assessment has been submitted with the application which states that a review has been undertaken of the existing signs, lines and infrastructure within the vicinity. It has found that some are in poor condition and need updating. This should be carried out in conjunction with the proposed development, although the applicant does not appear to have specifically referred to these recommendations.
- 6.16 It is proposed to access the site directly from the A227 as existing. It is proposed to provide separate circulatory routes, allowing the school to operate independently from the existing school. Access arrangements from the A227 can be satisfactorily created and can be flexibly designed to fit in with a new bypass junction if that were to emerge in the future. The proposed school would amount to an 8% increase in attendance numbers to the existing Wrotham School, and therefore it has been concluded that there is unlikely to be a material impact on the existing road network. Most pupils travel to the existing school in groups in taxis. However, the school is also close to the railway centre and bus links from Borough Green.
- 6.17 The site lies to the south of the M26 motorway. PPG24 states that noise-sensitive development should not be permitted where the use would be exposed to unacceptably high levels of noise. Saved Policy P3/17 of the Tonbridge TMBLP states that in considering proposals for noise sensitive development the impact of existing noise sources should be minimised through positioning of buildings and noise-sensitive rooms within buildings away from the noise source, though specific detailed design features and through the appropriate use of noise barriers. The building has been designed to have the main classrooms facing south, away from the M26. Rooms such as the music room and the IT room have been proposed for the north of the building. The proposals, with the mitigation measures

proposed are such that teaching rooms comply with the relevant standards in Building Bulletin 93 'Acoustic Design of Schools'. This is on the basis that there will be appropriate glazing, and, when windows are closed, acoustically treated louvered passive ventilation to the teaching rooms would be provided. Therefore, should planning permission be granted, this should be subject to a condition ensuring internal noise levels in teaching rooms not to exceed 35dB Laeq T.

- 6.18 The site does not fall within an Air Quality Management Area, nor are there any known issues with air quality. There are a number of quarries nearby, but no known complaints. However, there are conditions on the quarry planning permissions relating to air quality.
- 6.19 A Heritage Assessment has been carried out and it has been concluded that the potential of archaeological features is low. Evidence suggests that the site was an agricultural landscape.
- 6.20 The project ensures the retention of an important part of the community infrastructure in this part of Kent, rather than it being relocated elsewhere in the County. Indeed the locational requirements of the proposed school coupled with its well proven and special community benefit form a sound basis for a case of very special circumstances required to support development in the green belt. It is for the County Council as planning authority to make an overall assessment of very special circumstances but in a strictly practical sense development of this site will not have a significant impact in the wider Green Belt. In terms of an architectural intervention I consider this building to be a very interesting approach to school design and the way in which a new school can be inserted into a location such as this.

7. Recommendation:

- 7.1 **No Objection** be raised in accordance with the following submitted details: Notice dated 12.09.2008, Other LIST OF DOCUMENTS AND PLANS dated 12.09.2008, Design and Access Statement dated 12.09.2008, Planning Statement dated 12.09.2008, Report GREEN BELT REPORT dated 12.09.2008, Report STATEMENT OF COMMUNITY INVOLVEMENT dated 12.09.2008, Ecological Survey B0988200/01 dated 12.09.2008, Report B0988200/02 dated 12.09.2008, Habitat Survey Report B0988200/03 dated 12.09.2008, Survey B0988200/04 dated 12.09.2008, Acoustic Assessment B0988200/05 dated 12.09.2008, Report B0988200/06 (TRAFFIC SCOPING) dated 12.09.2008, Transport Assessment B0988200/07 dated 12.09.2008, Flood Risk Assessment B0988200/09 dated 12.09.2008, Report B0988200/11 dated 12.09.2008, Environmental Assessment B0988200/12 dated 12.09.2008, Air Quality And Odour Survey B0988200/13 dated 12.09.2008, Landscaping B0988200/15 dated 12.09.2008, Tree Report B0988200/16 dated 12.09.2008, Contaminated Land Assessment B0988200/17 dated 12.09.2008, Report B0988200/18 dated 12.09.2008, Other B0988200/19 (SUSTAINABILITY) dated 12.09.2008, Drawing

2498/PL030 REV A dated 12.09.2008, Drawing 2498/PL031 REV A dated 12.09.2008, Drawing 2498/PL032 REV A dated 12.09.2008, Drawing 2498/PL033 REV A dated 12.09.2008, Drawing 2498/PL034 REV A dated 12.09.2008, Drawing 2498/PL035 REV A dated 12.09.2008, Drawing 2498/PL036 REV A dated 12.09.2008, Location Plan 2498/PL001 REV C dated 12.09.2008, Site Plan 2498/PL010 REV C dated 12.09.2008, Site Layout 2498/PL011 REV B dated 12.09.2008, Proposed Plans 2498/PL012 REV A dated 12.09.2008, Proposed Plans 2498/PL013 REV A dated 12.09.2008, Roof Plan 2498/PL014 REV A dated 12.09.2008, Section 2498/PL015 REV A dated 12.09.2008, Elevations 2498/PL016 REV A dated 12.09.2008, Elevations 2498/PL017 REV A dated 12.09.2008, Elevations 2498/PL018 REV A dated 12.09.2008, Elevations 2498/PL019 REV A dated 12.09.2008, Elevations 2498/PL020 REV A dated 12.09.2008, /subject to the following comments:

- Recommendations in Highway Assessment should be carried out as critical to safe operation of the site *see my comments above (does this need to go in?;*
- Any planning permission granted should require internal noise levels in teaching rooms not to exceed 35dB Laeq T, as required in the Building Bulletin 93 'Acoustic Design of Schools', through the use of appropriate glazing and acoustically treated louvered passive ventilation to the teaching rooms

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