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Planning, Design & Access Statement

PLANNING APPLICATION BY:

EMMAUS SCHOOL

RELATING TO:

EMMAUS SCHOOL
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1. INTRODUCTION:

1.1. This Planning, Design & Access Statement has been prepared on behalf of Emmaus School in support of an application for full planning permission at Emmaus School, School Lane, Staverton for the following development:

> **"Demolition of existing modular classroom and rear extension to main school building; erection of two storey building on existing playground; erection of single storey rear extension; with associated landscaping and highways works".**

1.2. We are familiar with the site and the surrounding area and have studied carefully the site's planning history and have then advised on the preparation of this application for planning permission. We have been involved in pre-application discussions with the Council under reference **ENQ/2023/01094** which has informed this submission. As part of the preparation of this application we have also sought pre-application advice from Sport England.

1.3. This statement should be read in conjunction with the prepared architectural drawings by CH Architech Ltd, Preliminary Ecological Appraisal by Skilled Ecology and an Education Need Statement which has been prepared by the school.

1.4. The purpose of this Planning, Design & Access Statement is to detail the site and development proposals, identify the planning merits of the application against adopted and emerging policy guidance and best practice, and to identify any other material considerations in order to undertake the planning balance.

2. THE APPLICATION SITE AND SURROUNDING AREA:

2.1. The application site is situated on the western side of School Lane, at its northern end close to the junction with New Terrace. The site is situated at the northern tip of Trowbridge and just south of Staverton.



Figure 1: OS Map

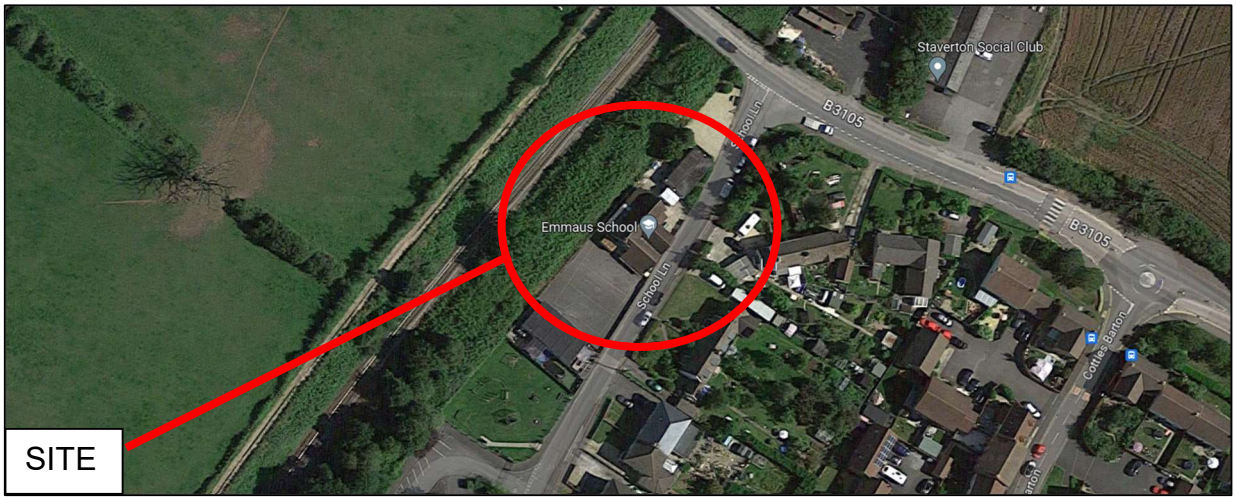

Figure 2: Aerial photo (Google Maps).

2.2. To the east of the application site is generally two storey semi-detached dwellings set back from the highway. Further south is Staverton Church of England Primary School with Nestlings Pre-School abutting the southern boundary. The western boundary comprises a railway line. The

application site comprises car parking and a modular classroom in the northern parcel of the site. The existing modular classroom is in a very poor state of repair. The central section of the site consists of the main school building which has been modified by unsympathetic additions to the rear. The southern parcel of the site consists of the school playground, although sports activities take place off site at the Staverton Recreation Ground.



Figure 3: Proposed location of modular building.



Figure 4: Looking south down School Lane.



Figure 5: Looking north along School Lane.



Figure 6: Looking east across railway line.

2.3. The site is situated in the built confines of Trowbridge. It is not situated in a Conservation Area and the main school building is not statutorily listed. There are no landscape or ecological designations which cover the site.

3. RELEVANT PLANNING HISTORY & CONSULTATION:

(i) Site

3.1. The following planning history is recorded for the site.

- W/06/01108/FUL - Demolition of existing side room to main building and separate mobile classroom, 2 new extensions to sides of existing school building and conversion of part of existing roofspace to provide additional classrooms, sanitary facilities and new reception/entrance area.
- W/10/00272/FUL - Removal of existing mobile classroom and demolition of existing single storey extension, to allow replacement single storey rear extension, and two storey side extension.
- 15/12696/FUL - Refurbishment and two storey extension.

3.2. An extract of the approved plans of the 2015 permission are outlined below.

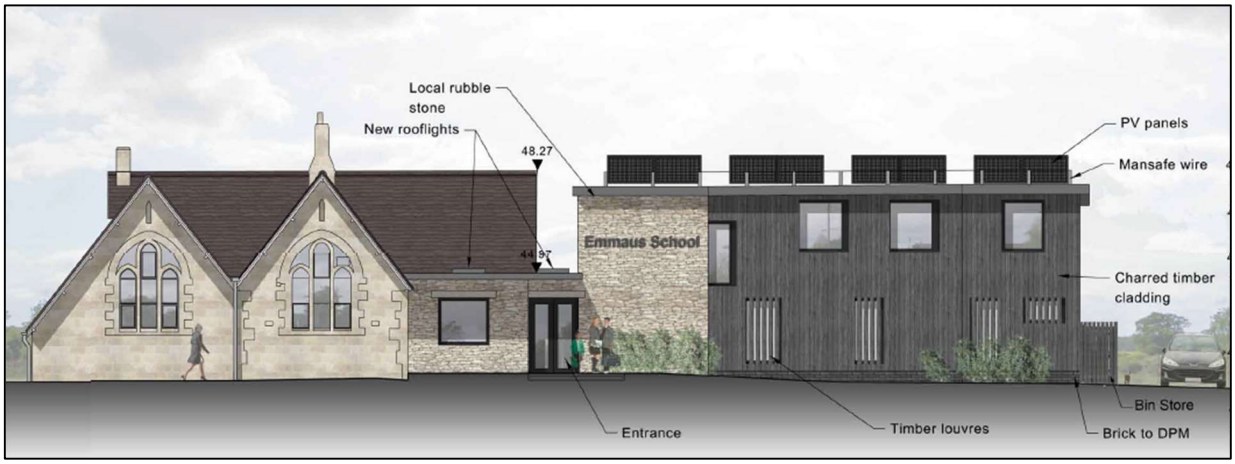

Figure 7: Proposed street scene – 2015 permission.

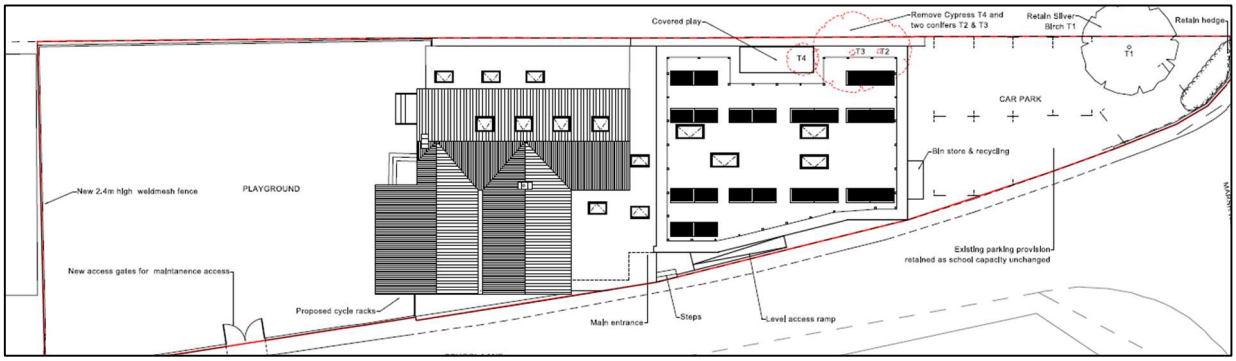

Figure 8: Proposed site plan – 2015 permission.

3.3. In reviewing the officer report, the following pertinent conclusions were made in assessing the application:

- Principle of development acceptable.
- Although it could be assessed as a non-designated heritage asset, a proposal for a two storey extension was assessed as acceptable on the grounds that:
  - The building has been subject to extensions and alterations in the past.
  - Its historic setting has been substantially eroded.
  - Any limited harm to the building is therefore not considered to carry significant weight and outweighed by supporting an on-going viable use of the building.
- The proposed extension would cause no significant harm to the character and appearance of the area, although it would bring a 2-storey form up to the front of the site and the carriageway and this is not ideal.
- The application site is located on the opposite side of the road to any neighbouring residential property and reasonable separation distances would remain between the development proposal and any neighbouring property such as to avoid any impact in terms of overlooking, loss of sunlight, loss of daylight and overshadowing.
- Highways and parking acceptable as number of pupils will not increase.
- Acceptable in terms of drainage.

3.4. The above conclusions have informed this pre-application proposal.

(ii) Pre-Application

Wiltshire Council

3.5. Prior to lodging this planning application, the school and project team submitted a pre-application with Wiltshire Council under reference ENQ/2023/01094. An on site meeting was held with the Council Officer Russell Brown on 22 September. A summary of the advice received is outlined below:

- Principle of development is acceptable.
- Highways support the proposal.
- Proposal is unlikely to result in demonstrable loss of amenity to adjoining residents.
- Preliminary Ecological Appraisal should be submitted with planning application.
- Drainage acceptable.
- Pre-application advice should be sought from Sport England to consider relocation of playground.
- Proposed design of two storey building would lead to a visual relationship where the historic building would remain the dominant focus on the site.

3.6. The advice concludes that an application would be encouraged by the Council. Notwithstanding this, the above advice has informed this planning application submission.

Sport England

3.7. Following the pre-application with Wiltshire Council, the project team undertook pre-application advice with Sport England under reference PA/23/SW/WSH/65741.

3.8. Sport England stated that

> *"As there is no loss of playing fields, Sport England has no comments on the pre-application. Sport England would not expect to be consulted by Wiltshire Council as the application is non-statutory and does not fall into any of the categories where a local authority is recommended to consult us".*

(iii) Consultation

3.9. Prior to lodging the school has met with the Parish Council and circulated a letter to nearby residents informing them of the planning application.

4. THE APPLICATION PROPOSAL:

4.1. Full planning permission is sought for the following development:

"Demolition of existing modular classroom and rear extension to main school building; erection of two storey building on existing playground; erection of single storey rear extension; with associated landscaping and highways works".

4.2. The application development represents a revised proposal following the approval of planning permission **15/12696/FUL** which was permitted by the Council on 27 April 2016. Despite the need for the extension by the school, the permission has since lapsed as the extension was undeliverable due to the financial cost of building the addition, as explained in the **Educational Needs Statement (ENS)**.

4.3. The application development instead proposes to erect a two storey modular building on the existing playground in the southern parcel of the site. The proposal will not result in an increase in pupils on roll and will instead significantly enhance the standard of accommodation for the school. The deficiencies of the current school which will be addressed as part of the development are detailed in the **ENS** but are summarised below:

- Poor changing facilities and no showers.
- No designated First Aid Room.
- No disability access.
- Inadequate toilet facilities.
- Insufficient number of classrooms.
- Inadequate facilities.

4.4. The proposed building will exhibit a contemporary materials palette with flat roof. The facades will comprise painted metal cladding and fascia's, with timber cladding. It will be set lower than the ridge height of the main school building and set behind the front building line of this.

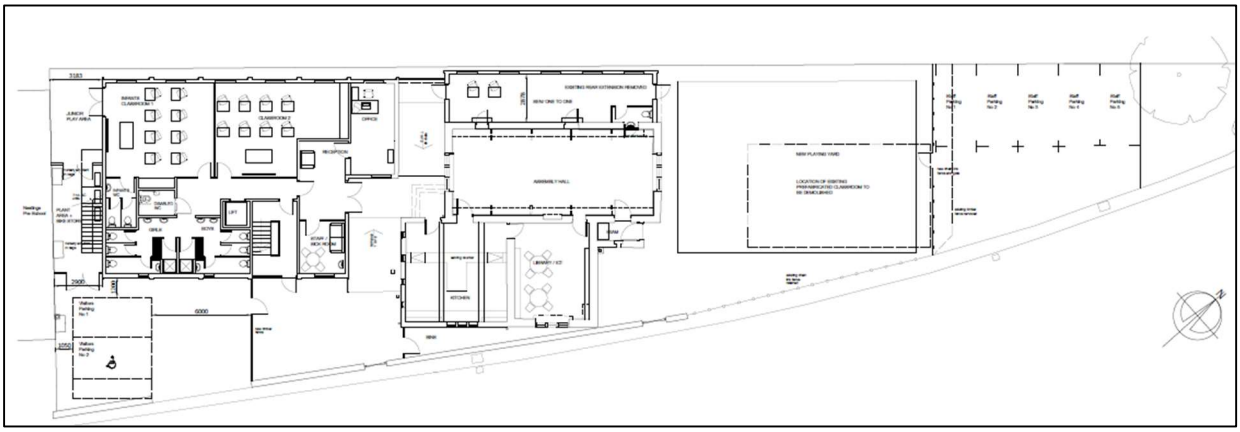

Figure 9: Proposed site plan.

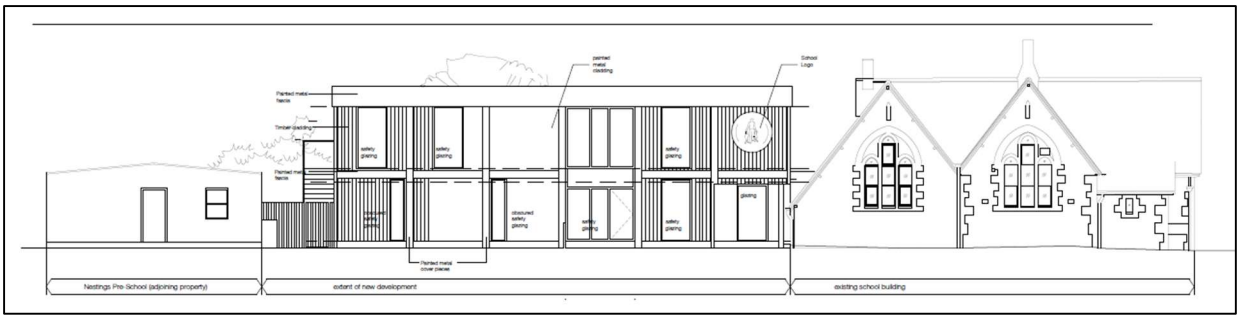

Figure 10: Proposed street scene.

4.5. The proposal will involve demolishing the rear lean-to toilet block which will be replaced by a single storey timber clad extension to the rear of the existing school building. This will be linked to the new two storey building by a canopy.

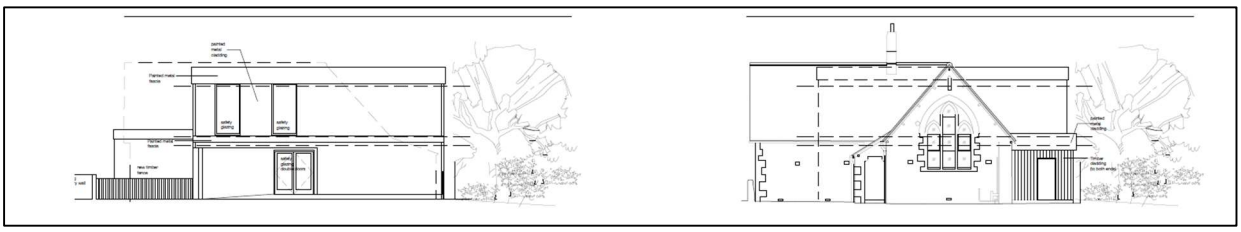

Figure 11: Proposed side elevations.

4.6. Internal alterations are proposed to the existing school building to reconfigure this space.

4.7. The existing modular building in the northern parcel of the site will be removed from site and be replaced by a new playground area. Parking will be retained as existing in the northern parcel of the site, with new visitor parking and access in front of the new building in the southern parcel of the site.

5. PLANNING POLICY & MATERIAL CONSIDERATIONS:

5.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that where the development plan contains relevant policies, applications for development which are in accordance with the plans should be allowed unless material considerations indicate otherwise.

5.2. The relevant planning policy framework for this application is:

- Wiltshire Core Strategy (2015)
- West Wiltshire District Plan 1st Alteration (2004).
- Wiltshire Waste Core Strategy

5.3. The following document list also merits due consideration:

- Wiltshire's Community Infrastructure Levy – Planning Obligations Supplementary Planning Document (Planning Obligations SPD)
- Wiltshire's Community Infrastructure Levy - Charging Schedule (Charging Schedule)
- Wiltshire's Community Infrastructure Levy - Regulation 123 List (123 List)
- Wiltshire Local Transport Plan 2011-2026 – Car Parking Strategy

5.4. The Council is undertaking a Local Plan Review. Following a series of consultations, informing a review of the Local Plan, a draft version moved to a final public pre-submission consultation from Wednesday 27 September to Wednesday 22 November 2023.

5.5. The National Planning Policy Framework and the Planning Practice Guidance (PPG) are material considerations.

National Planning Policy Framework (NPPF) 2023:

Section 2 – Achieving Sustainable Development

5.6. Paragraph 7 of the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the

ability of future generations to meet their own needs. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development.

Section 8 – Promoting healthy and safe communities

5.7. Paragraph 95 states that it is important 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:

a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and
b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.

5.8. Paragraph 99 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

Section 9 - Promoting sustainable transport

5.9. Paragraph 111 of the Framework states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Section 12 – Achieving well designed places

5.10. Paragraph 126 states that the creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

5.11. Section 130 outlines that planning policies and decisions should ensure that developments:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks;

The Wiltshire Core Strategy (WCS) 2015

5.12. The following policies have been reviewed as part of the preparation of this planning application:

CP1 (Settlement Strategy)
CP2 (Delivery Strategy)
CP3 (Infrastructure Requirements)
CP7 (Bradford on Avon Area Strategy)

CP50 (Biodiversity and Geodiversity)
CP52 (Green Infrastructure)
CP57 (Ensuring High Quality Design and Place Shaping)
CP60 (Sustainable Transport)
CP61 (Transport and Development)
CP62 (Development Impacts on the Transport Network)
CP64 (Demand Management), CP67 (Flood Risk).

The West Wiltshire District Local Plan (1st Alteration) (WWDLP) 2004

5.13. When adopting the WCS, some policies remain saved from the West Wiltshire District Local Plan (1st Alteration) (WWDLP). Those which are relevant to this application include: U1a (Foul Drainage/sewerage treatment).

Other Material Considerations

5.14. The following policy document has also been reviewed as part of this planning submission:

- Sport England - PLANNING FOR SPORT GUIDANCE (June 2019)

6. PLANNING MERITS:

6.1. In light of the foregoing policy assessment and description of the proposed development, the following main issues will be considered as part of this planning analysis:

- Principle of Development / Educational Need
- Siting on Playground
- Design / Character of Area
- Residential Amenity
- Highways
- Ecology
- Flood Risk/Drainage

Principle of development / Educational Need

6.2. Paragraph 95 of the NPPF states that it is important 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:

a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and
b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.

6.3. The provision of additional education facilities should be, in accordance with the development plan strategy set out at CP1, CP2 and CP3 of the Core Strategy, supported in principle.

6.4. The Council have previously supported a two storey extension at the site under planning permission 15/12696/FUL.

6.5. As explained in the **ENS**, the previous proposal was not viable but the need for enhancing the school's facilities remains as acute. As with the 2015 permission, the proposal will not increase the number of pupils at the site but provide significant improvements to the teaching facility.

6.6. The modular building provides a low carbon option which re-uses and re-purposes an existing building, enhancing the sustainability of the proposals.

6.7. For the above reasons the proposal is acceptable in principle subject to material planning considerations. The principle of development was assessed as being acceptable at pre-application stage.

Siting on Playground

6.8. Although the modular building will be situated on the school's existing playground this will be re-provided in the northern parcel of the site. The proposal also provides a dedicated indoor hall (due to the size of the school it currently doesn't have one), so therefore the proposal will also provide indoor PE provision. The relocated playground and indoor hall provide equivalent area of the existing playground and therefore there will not be any loss of sports or play provision at the school.

6.9. The school also has an agreement to use the nearby Recreation Ground to the south of the site. Finally, the proposals will allow for showers and improved welfare facilities for the school which they currently don't have.

6.10. Pre-application was undertaken with Sport England who stated that as the proposal does not result in the loss of playing field or pitches, then they would not be a statutory consultee on a planning application.

Design / Character of Area

6.11. In detail, Core Policy 57 of the Wiltshire Core Strategy states:

"A high standard of design is required in all new developments … Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality. Applications for new development must be accompanied by appropriate information to demonstrate how the proposal will make a positive contribution to the character of Wiltshire through:

- *enhancing local distinctiveness by responding to the value of the natural … environment, relating positively to its landscape setting and the existing pattern of development and responding to local topography by ensuring that important views into, within and out of the site are to be retained and enhanced*
- *the retention and enhancement of existing important landscaping and natural features, (e.g. trees, hedges, …), in order to take opportunities to enhance biodiversity, create wildlife and recreational corridors, effectively integrate the development into its setting and to justify and mitigate against any losses that may occur through the development*
- *responding positively to the existing townscape and landscape features in terms of building layouts, built form, height, mass, scale, building line, plot size, elevational design, materials, streetscape and rooflines to effectively integrate the building into its setting …*
- *making efficient use of land whilst taking account of the characteristics of the site and the local context to deliver an appropriate development which relates effectively to the immediate setting and to the wider character of the area*
- *having regard to the compatibility of adjoining buildings and uses, the impact on the amenities of existing occupants, and ensuring that appropriate levels of amenity are achievable within the development itself, including the consideration of privacy, overshadowing, vibration, and pollution (e.g. light intrusion, noise, smoke, fumes, effluent, waste or litter)*
- *ensuring that the public realm, including new roads and other rights of way, are designed to create places of character which are legible, safe and accessible in accordance with Core Policy 66 (Strategic Transport Network)*
- *taking account of the needs of potential occupants, through planning for diversity and adaptability, and considering how buildings and space will be used in the immediate and long term future*
- *the use of high standards of building materials, finishes and landscaping, including the provision of street furniture and the integration of art and design in the public realm*
- *meeting the requirements of Core Policy 61 (Transport and New Development).”*

6.12. The removal of the unsightly modular classroom and modern rear extension, both of which are in poor condition will enhance the amenity of the area and wider street scene.

6.13. The Council have previously permitted a two storey contemporary extension on the northern parcel of the site under planning permission 15/12696/FUL. This revised proposal will be situated on the existing playground on the southern section of the site. This moves the proposal away from the front of the site which was previously raised as a concern by the Council.

6.14. The proposal will exhibit a similar palette of materials as the 2015 permission and will continue to be subservient to the main school building due to its lower height and that it will be situated behind its building line. The application proposal will represent a proportionate infill proposal which will result in an enhancement to the street scene. It will respect the ribbon of development along the western side of School Lane.

6.15. The justification made by the Council under the 2015 permission of a two storey building against the main school building (being locally listed) remain valid. This was confirmed at pre-application stage by Officers.

6.16. For the above reasons the proposal is therefore in accordance with Section 12 of the NPPF and policy CP57 of the WCS.

Residential Amenity

6.17. The proposal will be set on the other side of the highway to properties on the eastern side of School Lane. Given the distance of the proposal to these adjoining dwellings, the development will not result in the loss of outlook or light to these residents.

6.18. Although the proposal will introduce first floor windows, as the new building will be 23m from the front elevations of the neighbouring dwellings opposite, the proposal will not result in a harmful impact on the privacy of these residents, particularly given that the hours of operation of the school do not run into the evenings or weekends.

6.19. In addition, the new building would be sited on the existing playground, which is being relocated to the other side of the school. Therefore, the houses opposite will have that element of noise from the playground removed.

6.20. The relocated playground will not have an impact on the neighbouring properties opposite, as these houses are set further back from the road/corner and are set at an angle. Similar to above, the hours of operation would mean that there would not be a harmful impact to those properties.

6.21. For the above reasons, the proposal will not result in harm to neighbouring amenity and will be in compliance with Section 12 of the NPPF and policy 57 of the WCS.

Highways

6.22. The proposal will not increase pupil numbers at the site, and it is noted that the 2015 permission was not objected to by the Highways Department. This was reconfirmed at pre-application stage by Officers.

6.23. Additional parking will be provided in front of the modular building, with the existing parking area in the northern parcel of the site also being retained. More parking will therefore be provided than the 2015 consent.

6.24. On this basis, there should not be any transport related objections to the proposals and the development is in line with Section 9 of the NPPF and polices 60, 61 and 62 of the WCS.

Ecology

6.25. A **Preliminary Ecological Appraisal** has been prepared by Skilled Ecology as part of the preparation of this planning application. The survey was conducted on 26 October 2023. The survey consisted of an inspection for preferred habitat types and signs and evidence of protected and priority species, such as for bats, great crested newts, reptiles, badgers Meles meles and nesting birds following Natural England (English Nature) Guidelines. A local record search was undertaken.

6.26. The survey failed to find signs or evidence of protected or priority species. The site supports common and widespread habitats very low in ecological value.

6.27. The risk of presence and significant harm or impact to protected, priority or rare species was considered negligible. Further ecological surveys or mitigation were considered unnecessary. To

minimise any residual risk of impact to protected, priority or rare species and valuable habitats, precautionary measures, should be followed.

6.28. With the recommendations followed as described, development could proceed with a minimal risk of harm or impact to local ecological value or to protected, priority or rare species.

6.29. Biodiversity enhancement recommendations are also included in the report in accordance with national planning policy and can be secured via condition as necessary.

Flood Risk / Drainage

6.30. The application site is located within flood zone 1 – the lowest probability of fluvial flood risk and in a location with no known surface water flooding issues. There are records of ground water flooding within this part of Wiltshire. However, it has to be acknowledged that the site is raised substantially above the network rail infrastructure to the north which makes ground water flooding unlikely at the site.

7. PLANNING BALANCE & CONCLUSION

7.1. This Planning, Design and Access Statement has demonstrated that the proposed development is acceptable in principle and provides additional classroom space for existing pupils of the school. The educational need for the development should be given weight in favour of the proposal.

7.2. Through pre-application discussions with Sport England, it has been determined that there will be no impact on sports provision at the school.

7.3. The proposed design of the development will appear in harmony with the existing school buildings and will preserve the character of the wider area.

7.4. There will be no harmful impact on neighbouring residents.

7.5. The statement has also outlined that the development is acceptable in terms of highways, ecology or drainage.

7.6. In view of the above, it is concluded that the development proposed in this application is consistent with the aims and detailed requirements of the National Planning Policy Framework and the Development Plan and as such, should be given planning permission.