CASE OFFICER'S REPORT

Application Reference:	PL/2023/09494
Application Type:	Wiltshire Council R3
Site Inspection:	
Consultation ends:	23 February 2024
Case officer:	Lucy Rutter-Dowd

Site Address:	Silverwood School, Rowde, Devizes, Wilts, SN10 2QQ
Proposal:	Siting of 1 no. temporary Classroom 01 for early years classroom and 1 no. temporary classroom 02 Key Stage 3 with play areas until August 2025
Recommendation:	Approve with Conditions

Site Description

Silverwood School (also known as Rowdeford School) is a county special school located in countryside close to the village of Rowde. The school campus supports Rowdeford House (a grade II Listed former country house) and its contemporary outbuildings and walled garden (all in use for educational purposes), and other later educational buildings and facilities (including some mobile classrooms). All are located within a part parkland and part agricultural setting. The site is currently under substantial development to erect new facilities.

The application seeks retrospective planning permission for the siting of two no. mobile classroom units adjacent to the grade II listed building. Revised plans were received during the application to address an incorrect site layout plan that did not according with the on ground set up of buildings and associated playground areas.

Policies

Local:

The adopted Wiltshire Core Strategy (WCS) and made Neighbourhood Plans:

- Core Policy 1 – Settlement Strategy
- Core Policy 2 – Delivery Strategy
- Core Policy 12 - Spatial Strategy for the Devizes Community Area
- Core Policy 49 – Protection of rural services and community facilities
- Core Policy 50 – Biodiversity and geodiversity
- Core Policy 51 – Landscape
- Core Policy 57 - Ensuring high quality design and place shaping
- Core Policy 58 - Ensuring the conservation of the historic environment
- Core Policy 61 - Transport and Development
- Core Policy 67 - Flood Risk

National:

National Planning Policy Framework 2023 (NPPF)
Planning Practice Guidance (guidance on the policies contained within the NPPF)
Planning (Listed Buildings and Conservation Areas) Act 1990

Design guidance

- The Wiltshire Design Guide (adopted April 2024);
- National Design Guide (2021);
- East Wiltshire (former Kennett District) Landscape Character Assessment.

Relevant Planning History

K/46783 - Supply and erection of a relocated double mobile classroom plus 2 additional car parking bays - Approved - 29/01/2004
K/52085/WCC - Retention of a single mobile with toilets and a single science mobile with prep room - No objections - 23/05/2005
K/52191/WCC - New double mobile unit with study area - No objections - 14/06/2005
K/52192/WCC - New multipurpose activity hall with ancillary changing accommodation and storage areas. New autistic centre classrooms and ancillary accommodation. External paving, landscaping and car parking - Object - 14/06/2005
K/52978/WCC - New multipurpose activity hall with ancillary changing accommodation and storage areas. New autistic centre classrooms and ancillary accommodation. External paving, landscaping and car parking - No objections - 07/10/2005
K/53119/WCC - Retention of a single mobile classroom with toilets - No objections - 27/10/2005
E/10/1449/S73 - Variation of condition 10 on K52978/F to renew temporary permission for three mobile classrooms.
16/00432/DP3 - To renew planning permission for 3 double mobile classrooms (app E/10/1449/573) - Approved with Conditions - 09/03/2016
PL/2021/04319 - Temporary double mobile classroom - Approved with conditions - 09/06/2021
PL/2021/06782 - Proposed development of Silverwood School, extending the existing Rowde Campus (formerly Rowdeford School) to provide a high quality SEND school campus for 350 students including the construction of a new two storey education building with new Hydrotherapy Pool, teaching classrooms and Main Hall, the development of existing buildings, new all-weather sports pitch, new playing fields, on-site parking, landscaping, ecological enhancements and associated works - Approved with conditions - 20/10/2021

Constraints

- Grade II Listed Building (adjacent)
- Priority Habitat (adjacent)
- 2km Core (bat) Roost Buffer

Key Issues

- Principle of development

• Landscape Impacts
• Design and visual impact
• Heritage Impacts
• Parking / Highways
• Ecology
• Flood Zone

Consultee Responses

Archaeology - One letter received making the following comments:

"Thank you for your consultation. The area immediately around Rowdeford School was the subject of an archaeological trial trench evaluation in 2021. This evaluation recorded no sub-surface features that dated earlier than the post-medieval period. The results of this evaluation, together with the relative slight impact that the establishing of temporary structures on the site will have, means I do not wish to raise any archaeological issues in this instance."

Highways - No objections.

Conservation - No objections, comments included within report.

Environment Agency - No comments received.

Rowde Parish Council - No comments received.

Representations

None received.

ASSESSMENT

Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004 require that the determination of planning applications must be made in accordance with the Development Plan, unless material considerations indicate otherwise.

Principle of development

Paragraph 99 of the NPPF states:

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 school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.

This is a long established school site, and so the principle of its use for this purpose - and for associated operational educational development - is established. Further more, the need for the temporary units is associated with the current development of the school (ref: PL/2021/06782) which is currently in its construction phase. The units are required to accommodate existing pupils while the construction of new classrooms is carried out. In light of the above and the contents contained with the NPPF as cited above, the principle of development is considered acceptable.

Landscape Impacts

CP51 of the WCS proposes that Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures.

The mobile units are placed within the established school grounds which is well bounded and screened from wider views within the landscape. The units are not considered to have a harmful impact on the wider setting or surrounding landscape character and will be read in conjunction with existing school buildings. It is also considered, that the placement of the units is for a temporary period, and as such any harm caused to the setting will also be temporary and the permission conditioned to secure returning the land to its former state following the removal of the units.

Design and visual impact

Core Policy 57 of the Wiltshire Core Strategy states that *"A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality."* Proposals should seek to enhance local distinctiveness and have regard to existing townscapes, patterns of development and the historic environment and landscape setting.

The units are typical in design for their purpose, and as highlighted above, are well associated with existing school buildings, will be temporary and seek to support facilities within the school during a major construction phase. The units will be sited on an area of grass land so as not to interfere with the masterplan of current buildings works taking place on site and the submission is supported by a landscape restoration plan.

The main impact of the buildings in this instance is considered to be the impact on the setting of the adjacent listed building, This is commented on in more detail below.

Heritage Impacts

CP 58 of the WCS states that development should protect, conserve and where possible enhance the historic environment…Designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires 'special regard' to be given to the desirability of preserving a listed building or its setting. The following comments have been received from the conservation officer, the full comments can be read on the councils website the assessment and conclusion are included below:

"Assessment: *the proposed classrooms will be located within the immediate garden setting of the house and will inevitably result in a level of harm by virtue of the visual intrusion and reduction in the contribution that this setting makes to the significance of the listed building. However, the proposals relate to a temporary period only and there are provisions for the removal of the buildings and for making good the site following this. The harm caused will therefore be temporary with no residual impact.*

Summary & conclusion: *The NPPF confirms that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). It makes clear that any harm to a designated heritage asset requires clear and convincing justification. The proposals will result in a level of harm by virtue of development within the setting of the listed building – however, this will be temporary and there will be no residual harm following the removal of the classrooms. The final planning balance falls to be assessed by the Case Officer, but it is understood that the proposed temporary classrooms are considered to provide considerable public benefits in terms of meeting an urgent need in an unplanned situation (whilst the new campus is delayed) in providing educational accommodation for vulnerable children. On this basis, it is expected that the modest level of purely temporary harm to the listed building will be considered to be outweighed by the wider public benefits of the proposals.*

The retention of the classrooms beyond the period would, however, result in the harm being consolidated and I would suggest that conditions be added to secure the removal and making good in a timely manner."

Parking / Highways

The proposal raises no concerns from a highway perspective and no objections have been raised by the highway officer. The units are to accommodate existing students at the site during a period of construction, as such, no intensification of the site in terms of vehicle movements and parking need will result from the works.

Concerns were initially raised due to the submission including an incorrect site plan which appeared to block the main access through the site, however this concerns was alleviated through the submission of a revised plan.

Ecology

The site lies within 2km of a core bat roost and adjacent to areas of priority habitat. Ecological issues within the site have been considered at length within the application for redevelopment of the site as a whole (app ref: PL/2021/06782) which include extensive ecological surveys and

mitigation strategies. The provision of 2 temporary units to support this development are not considered to significantly alter the assessment already made at the site and so further surveys at this stage are not considered necessary.

However, given the proximity to ecological habitats, it would be reasonable to ensure that external lighting is secured and controlled at the site through means of a condition being placed on the decision notice. It is noted that there is existing external lighting in the form of downward pointing lighting above the entrances to the buildings, this would be required for safety purposes and is an acceptable form of the lighting for the site. Any additional lighting will require further consideration and approval by the LPA.

The landscape restoration plan submitted as part of the proposal demonstrates the restoration of the grass land, together with extensive tree planting. This would be an enhancement to biodiversity within the site which accords with the criteria of CP 50 of the WCS.

Flood Zone

Flood Zones 2 & 3 lie approximately 65m to the south. As they do not encroach into the red line boundary of the site, a flood risk assessment is not required in this instance and there are no concerns regarding impacts from flooding within the application site boundary

Conclusion

In conclusion, the proposed application seems fitting with regard to scale, design, and materials as a temporary structure. The proposal is considered acceptable on a temporary basis only, due to its context of its surroundings and the assessment above against the general criteria set out in the aforementioned policies of the local development plan. A condition will therefore be imposed that the development is temporary until August 2025, which was amended from 2024 within the planning process due to the ongoing works on the wider site, which has resulted in the temporary classrooms being required for the next Academic Year (24-25). In any case due to the date of determination if permission was only granted until August 2024 it would only be granted permission for one month). With a condition controlling the development to be temporary, as well as other matters addressed within the above report, the proposal is acceptable and is recommended for approval.

Conditions: (3)

1 The development hereby permitted has been assessed against the following approved plans and documents:

Drg Title: Landscape Restoration Plan. Drg No: J01261-004.
Drg Title: Block Plan. Submitted: 03/06/2024.

Doc Title: Application Form.
Drg Title: Elevations Plan. Drg No: 005. Rev: A.
Drg Title: Floor Plan. Drg No: 004.
Drg Title: Site Location Plan.
Drg No: J01261-001. Rev: B.

REASON: For the avoidance of doubt and in the interests of proper planning.

2 With the exception of the existing downward pointing external lighting installed above the entrances to the buildings, no external lighting shall be installed on-site until plans showing the type of light appliance, the height and position of fitting, illumination levels and light spillage in accordance with the appropriate Environmental Zone standards set out by the Institution of Lighting Professionals in their publication “The Reduction of Obtrusive Light” Guidance Note 01/21 (reference GN01/21), have been submitted to and approved in writing by the Local Planning Authority. The approved lighting shall be installed and shall be maintained in accordance with the approved details and no additional external lighting shall be installed.

REASON: In the interests of the amenities of the area and to minimise unnecessary light spillage above and outside the development site.

3 The buildings hereby permitted shall be removed and the land restored to its former condition on or before the 31st August 2025 in accordance with the submitted details as showing in drg: Landscape Restoration Plan Ref: J01261-004.

REASON: In the interests of amenity, in order to secure the restoration of the land upon removal/extinguishment of a building/use for which permission can be justified only on the basis of a special temporary need.