

**Proposed increase in
published admission number**

at

**The Heights Primary School
129 Upper Woodcote Road
READING RG4 7LB**



PLANNING STATEMENT

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**for
The Heights Primary School**

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1. INTRODUCTION

- 1.1. This Planning Statement supports a planning application by The Heights Primary School [THPS] at 129 Upper Woodcote Road, Reading RG4 7LB [the Site] for an increase in its published admission number [PAN] from 350 to 420.
- 1.2. The application is being made to Reading Borough Council [RBC] as Local Planning Authority [LPA].
- 1.3. The Site is an established primary school with a current PAN of 350 which was included in the description of development when the school was built. This current application proposes simply the following:

Use of existing 2FE primary school for up to 420 pupils

- 1.4. This statement sets out the reasons for the proposal and assesses it against relevant policies in the development plan and other material considerations. It is structured as follows:
 - Section 2 – sets out the background and summarises the planning history
 - Section 3 – outlines planning policy and guidance relevant to the assessment of the proposal
 - Section 4 – considers the business case and educational need
 - Section 5 – addresses the potential transport impacts of the proposal
 - Section 6 – addresses the potential noise impacts of the proposal
 - Section 7 – sets out conclusions
- 1.5. The application is submitted online (Planning Portal ref: PP-12291344) and is accompanied by the following documents:
 - Site location plan
 - Transport Assessment and Travel Plan (Robert West)
 - Noise Assessment (ACCON)

2. BACKGROUND

Site and surroundings

- 2.1. THPS is located to the north-west of the Mapledurham Playing Fields, sharing its main access from Upper Woodcote Road and adjoining the pavilion, car park and tennis club (see Fig 1). The Site was leased by the Education Funding Agency in 2018 for the new school while enabling significant improvements to the playing fields and its facilities.
- 2.2. There is a secondary gated access to the playing fields from Chazey Road. There is extensive informal use of the playing fields alongside formal sports use. THPS uses the playing fields for formal PE lessons.
- 2.3. The school building is bordered to the north by external play space (for reception pupils) and the staff car park, to the west by soft landscaped external play space for junior pupils, and to the south by hard external play space and a multi-use games area (MUGA). To the west the school site adjoins an open space on Hewett Avenue and backs onto the gardens of two bungalows at 28 and 29 Hewett Avenue. The playing fields/pavilion car park is to the east, and to the south is a children's play area.



Fig 1: Aerial view of school (source Google Maps)

Planning history

- 2.4. Planning permission was originally granted for THPS on 14 August 2018 (RBC ref: 171023), revised on 25 February 2019 (RBC ref: 182200). There were various subsequent changes, some involving coordination of works to the Mapledurham Playing Fields (secured via a s106 agreement), and discharge of planning conditions.
- 2.5. The description of development limits the number of pupils the school is allowed to accommodate:
- Erection of 2FE primary school (350 pupils) with associated landscaping, multi-use games area (MUGA), car and cycle parking, and servicing...*
- 2.6. As originally set up, the 2FE school with 350 pupils was based on an educational model of 25 pupils/class; the intention is to increase this by 5 pupils/class, an additional 70 pupils in total, yielding a PAN of 420.
- 2.7. The reason for seeking this increase is to secure the financial security of the school. Section 4 of this Statement considers this issue in detail.
- 2.8. Table 1 below sets out the main items of planning history for the school and this site:

Reference	Description of development	Decision/date
<i>The Heights Primary School</i>		
171023	Erection of 2FE primary school (350 pupils) with associated landscaping, multi-use games area (MUGA), car and cycle parking, and servicing	Permitted 14.8.2018
182200	Erection of 2FE primary school (350 pupils) with associated landscaping, multi-use games area (MUGA), car and cycle parking, and servicing, without complying with conditions 2 (approved plans), 9 (landscaping scheme) and 10 (details of hard and soft landscaping of the MPF Community Car Park) of planning permission 171023/FUL.	Permitted 25.2.2019
	and related conditions, including school travel plan (RBC ref 210748, October 2022) and MUGA lighting (RBC 191016, April 2020)	Various
191728	Non-Material Amendment to condition no.2 (approved plans) of planning permission ref. 182200 (Erection of 2FE primary school (350 pupils) with associated landscaping, multi-use games area (MUGA), car and cycle parking, and servicing, without complying with conditions 2	Permitted 2.11.2020

	(approved plans), 9 (landscaping scheme) and 10 (details of hard and soft landscaping of the MPF Community Car Park) for changes to windows, curtain walling and spandrel panels	
210389	Non-Material Amendment to planning permission ref. 182200 for changes to the CMS (condition 5) to adjust phasing for works relating to the access and community car park improvements	Not determined
210213	Request to extend Saturday construction hours for internal works only from 0900 to 1300 hours to 0900 to 1600 hours in relation to planning permission ref. 182200	Permitted 11.2.2021
Mapledurham Playing Fields		
930614	Creation of a tennis court.	Permitted 28.4.1994
940439	Erection of floodlighting to two tennis courts.	Refused 19.10.1995
981046	Provision of floodlighting to two tennis courts.	Allowed on appeal 8.4.1999
130613	Replacement and extension of roof, installation of new roof lights and construction of glazed veranda on east elevation	Permitted 1.7.2013
182140	Erection of six floodlighting columns supporting six LED lamps and addition of six additional LED lamps to five existing floodlighting columns to providing lighting to courts two and three (amended description)	Permitted 6.8.2019
191677	Refurbishment and single storey front rear and side extensions to the pavilion building	Permitted 13.12.2019
190240	Landscaping works to the playing fields including a new tree lined and lit central avenue from Chazey Road, proposed perimeter footpaths with associated seating and trim trail equipment to the western part of the playing fields and re-profiling and drainage improvements to the grass sports pitches to the eastern part of the playing fields and related conditions	Permitted 16.4.2019
210572	Non-material amendment to planning permission 190240 including re positioning of trim trail units and children's play area, re-alignment of northern section of perimeter footpath and re-orientation of football pitches	Various Permitted 7.7.2021

Table 1: Planning history (source: RBC online planning register)

- 2.9. THPS was originally located at 82 Gosbrook Road RG4 8BH in temporary accommodation permitted in July 2014 (BRC ref: 140940).

Pre-application advice

- 2.10. In March 2023 THPS sought pre-application advice from RBC planning in relation to the proposal to increase its PAN.
- 2.11. Formal advice was provided in the form of an email dated 26.4.2023, alongside specific responses on transport and environmental protection (noise). The issues raised may be summarised as follows:
- Current surplus of primary school places in the North planning area (north of the Thames), while the NPPF para 95 strongly supports school expansion and widening of parental choice alongside consideration of potential physical issues (eg transport, noise)
 - Consideration of relevant Local Plan policies (OU1, TR1, TR3, CC6)
 - Desirability of pre-application public consultation
 - Requirement for a transport statement and updated travel plan, confirmation of any increase in catchment area affecting travel choices and any increase in staff numbers, need for physical surveys of actual vehicular/non-vehicular trips, additional cycle parking, possible amendment to footway layout on access road (to be addressed via s278 agreement on original permission)
 - Concern regarding noise arising from current use of the playground and MUGA, whether or not this would increase as a result of the increase in PAN, and consideration of the use of acoustic fencing
- 2.12. The submitted transport and noise impact assessments address the issues raised.
- 2.13. The advice also noted a number of matters relating to the original planning permission. These are the subject of separate application submissions.

3. PLANNING POLICY FRAMEWORK

- 3.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. In this instance the Development Plan comprise the Reading Borough Local Plan [RBLP] (adopted November 2019).
- 3.2. The Site has one designation on the Policies Map – a Local Green Space under Policy EN7 – though the plan predates the school development.
- 3.3. The following RBLP policies are relevant to this proposal:
- OU1: New and existing community facilities
 - TR1: Achieving the transport strategy
 - TR3: Access, traffic and highway-related matters
 - CC6: Accessibility and the intensity of development
 - CC8: Safeguarding amenity
 - EN16: Pollution and water resources
- 3.4. The National Planning Policy Framework (July 2021) [NPPF] and current National Planning Practice Guidance [NPPG] are also material planning considerations in the determination of planning applications.
- 3.5. In relation to school development, NPPF para 95 states:
- 95. 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.*
- 3.6. NPPG also refers to *Policy Statement – planning for schools development* (August 2011) which sets out the government’s commitment to support the development of state-funded schools and their delivery through the planning system. The document states:

The Government believes that the planning system should operate in a positive manner when dealing with proposals for the creation, expansion and alteration of state-funded schools, and that the following principles should apply with immediate effect:

- There should be a presumption in favour of the development of state-funded schools, as expressed in the National Planning Policy Framework.*
- Local authorities should give full and thorough consideration to the importance of enabling the development of state-funded schools in their planning decisions. The Secretary of State will attach significant weight to the need to establish and develop state-funded schools when determining applications and appeals that come before him for decision.*
- Local authorities should only impose conditions that clearly and demonstrably meet the tests set out in Circular 11/95. Planning conditions should only be those absolutely necessary to making the development acceptable in planning terms.*
- Local authorities should ensure that the process for submitting and determining state-funded schools' applications is as streamlined as possible, and in particular be proportionate in the information sought from applicants. For instance, in the case of free schools, authorities may choose to use the information already contained in the free school provider's application to the Department for Education to help limit additional information requirements.*
- A refusal of any application for a state-funded school, or the imposition of conditions, will have to be clearly justified by the local planning authority. Given the strong policy support for improving state education, the Secretary of State will be minded to consider such a refusal or imposition of conditions to be unreasonable conduct, unless it is supported by clear and cogent evidence.*

This statement applies to both change of use development and operational development necessary to the operational needs of the school. [emphasis added]

4. THE BUSINESS CASE AND EDUCATIONAL NEED

The business case

- 4.1. THPS opened in September 2014 with two reception and Year 1 classes in response to an increasing need for primary school places in NW Caversham. It grew organically, with two new reception classes of 25 children per class having joined each year since; it reached its full capacity of 350 pupils YR-Y6 in September 2020.
- 4.2. In the summer of 2021 the school moved from its temporary location in Gosbrook Road to its permanent location off Upper Woodcote Road.
- 4.3. At the outset, the school business plan was predicated on a PAN of 350, with 25 pupils/class. At that time, this was a model that the Department for Education/Education and Skills Funding Agency was able to support. The DfE/ESFA rules, however, changed not long after the school was set up and it now only supports schools with 30 pupils/class. The current Free School guidance states:

Your school's financial and educational viability is dependent upon admitting enough pupils. We are unlikely to approve schools with fewer pupils than our expectations on school size. ...

School type: Primary

Our expectations of school size: Minimum of 2 forms of entry of 30 pupils – total capacity 420 pupils

[Source: DfE Guidance How to apply to set up a mainstream free school (updated 20 September 2022) – Assessment Criteria]

- 4.4. Importantly, the physical building was designed to meet the standard DfE specification to accommodate the full PAN of 30 pupils/class, and relevant technical studies submitted with the 2017 application assumed a PAN of 420 for robustness.
- 4.5. THPS received supplementary growth funding until 2020, to support the core functions of a school, such as leadership and office staff, until the school grew to two classes in each year group. Its carefully managed reserves were needed to fund an additional Y6 class in 2020 as school funding changed once all year groups were represented in the school. It currently only operates with emergency ESFA support. It also receives the lowest per pupil Government funding (the Dedicated Schools Grant) of any RBC primary – £4,277.43 in 2022/23 against an average of £4,677.12

(91.5%), £4,417.36 against an average of £4,916.86 (89.8%) for 2023/24 (source: Policy Committee 20 February 2023, item 6, Appendix 6 Dedicated Schools Grant 2023/24, Annex 3 School Formula allocations for Primary and Secondary School 2023/24).

- 4.6. Given this challenging financial position the school has received advice from a School Resources Management Adviser (who reports to the DfE), most recently in Spring 2023. The SRMA's report is confidential, but his findings are fundamental to this application, and his recommendations include the following:
- exploration of benefits of joining a multi-academy trust [MAT] to share support and resources
 - retender of some external contracts
 - increase in PAN to 420
- 4.7. All but one of his recommendations would have only modest impacts on the overall financial situation. For example, joining a MAT would not involve any cross-subsidy between schools, but rather enable longer-term opportunities for shared resources and career progression for teachers. THPS is in advanced talks with a MAT.
- 4.8. The SRMA states that the current restriction on the PAN "is the root cause of the school's current financial challenges". Only the key recommendation to increase the PAN will provide the financial stability needed. Even then the financial gains would not be gained immediately as the additional spaces would not all be filled immediately.

School place planning

- 4.9. Against this backdrop are the comments from the LEA in the pre-application advice that "there is sufficient primary provision in Caversham for the foreseeable future and that there is no basic need requirement for further school places."
- 4.10. Primary School Designated Areas for North Reading are shown in Figure 2 below:

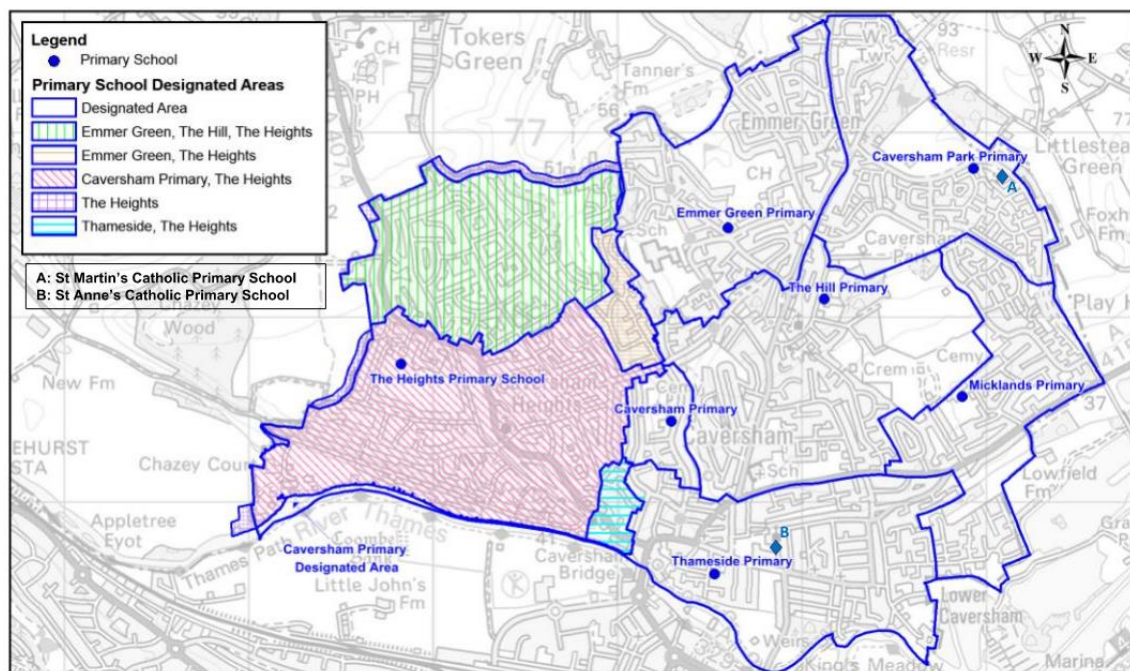


**Figure 2: Primary School Designated Areas – North Reading
(St Martin's and St Anne's Catholic Primary schools added)
(source: Adult Social Care, Children's Services and Education Committee,
18 January 2023)**

- 4.11. North Reading covers those parts of RBC area north of the Thames. The designated area for THPS overlaps with those of Emmer Green, Caversham Primary, and The Hill Primary School. Caversham Park and Micklands are located close to the eastern edge of the borough. St Martin's Catholic Primary is close to Caversham Park; St Anne's Catholic Primary is close to Thameside.
- 4.12. This is important since THPS was founded specifically to meet a large historical under-capacity in primary provision in NW Caversham. Geographically it is remote from its nearest neighbouring primaries – some 2km straightline distance from Emmer Green, 2.2km from The Hill, 1.5km from Caversham Primary and 2.1km from Thameside.
- 4.13. The data quoted by the LEA appear to be from the school place planning estimates (SCAP22) published by the DfE. These show a small recovery in pupil numbers and a reduction in the surplus at YR from the current 50 (11.4%) to 35 (8%) by 2025/26. The Appendix sets out the SCAP22 data for the North Reading primary schools.

- 4.14. Importantly, these data do not reflect the position in NW Caversham. In 2023, four of the five schools in NW Caversham (the exception being Thameside) were over-subscribed for YR admissions, while the schools in the rest of North Reading (including the two Catholic primaries) were undersubscribed (Table 2):

School	Capacity	Offers	Available	Not offered
The Heights	50	50	0	19
Caversham Primary	60	60	0	31
Emmer Green	60	60	0	14
The Hill	60	60	0	14
Thameside	60	44	16	0
Total NW Caversham	290	274	16	78
Caversham Park	30	8	22	0
Micklands	60	32	28	0
St Martin's Catholic	30	12	18	0
St Anne's Catholic	30	21	9	0
Total East Caversham	150	73	77	0
Total North Reading	440	347	93	78

Table 21: Admissions to Primary Schools 2023
(source: *Brighter Futures for Children*)

- 4.15. The differences between NW Caversham and the rest of North Reading are also evident in the overall school capacity. Table 3 presents the most recent published data from the DfE from 2022 which show a surplus of 4% in NW Caversham (within the 5% DfE guideline):

School	Capacity	Current no	Difference	%
The Heights	350	347	3	1%
Caversham Primary	420	410	10	2%
Emmer Green	420	411	9	2%
The Hill	420	397	23	5%
Thameside	420	393	27	6%
Total NW Caversham	2,030	1,958	72	4%
Caversham Park	210	144	66	31%
Micklands	420	377	43	10%
St Martin's Catholic	210	161	49	23%
St Anne's Catholic	210	205	5	2%
Total East Caversham	1,050	887	163	16%
Total North Reading	3,080	2,845	235	8%

Table 3: Primary School Capacity North Reading 2022
(source: <https://www.get-information-schools.service.gov.uk>)

- 4.16. Table 4 shows a similar picture from 2023 (with data matching that quoted by the LEA in the pre-application advice):

School	Capacity	Current no	Difference	%
The Heights	350	352	-2	-1%
Caversham Primary	420	414	6	1%
Emmer Green	420	413	7	2%
The Hill	420	387	33	8%
Thameside	420	380	40	10%
Total NW Caversham	2,030	1,946	84	4%
Caversham Park	210	131	79	38%
Micklands	420	350	70	17%
St Martin's Catholic	210	131	79	38%
St Anne's Catholic	210	180	30	14%
Total East Caversham	1,050	792	258	25%
Total North Reading	3,080	2,738	342	11%

Table 4: Primary School Capacity North Reading 2023
(source: Reading Schools Forum 9 March 2023 Item 7 Appendix 1)

- 4.17. It is clear therefore that the primary schools in the NW Caversham catchment are oversubscribed, notwithstanding a sufficiency of primary school capacity in North Reading as a whole and short-term forecast decline in primary school age children across the borough.

Planning merits

- 4.18. In this context it is important to consider the merits of the application against relevant planning policy tests.
- 4.19. The key test in the RBLP is Policy OU1 New and Existing Community Facilities, the relevant parts of which state:

Proposals for new, extended or improved community facilities will be acceptable, particularly where this will involve co-location of facilities on a single site. Proposals for on-site intensification of important facilities, such as schools and healthcare uses, will be supported, subject to other policies in the plan. ...

On-site intensification of some facilities, particularly schools, may result in some loss of open areas. This may be acceptable where the impact on open areas is minimised, and the area has no specific use, or where that use can satisfactorily be accommodated elsewhere on the site, subject to other policies in the plan. The above does not include loss of sports pitches and playing fields...

Where a proposal for a new school meets a clear need, and it would otherwise accord with national and local policy, it will be acceptable on sites identified for residential or other development. ...

- 4.20. It is clear that the on-site intensification of the school is supported in principle by this policy, subject to meeting other policy tests. These relate to the potential impacts of the intensification in relation to transport and noise: these are addressed in sections 5 and 6 below and are shown to be acceptable in terms of those RBLP policies.
- 4.21. In relation to the second part of the policy quoted above, it is important to note that no physical changes to the school building or its site are required to accommodate the increased PAN.
- 4.22. National policy (referenced in the final part of the policy quoted above) comprises the NPPF (para 195) and the Ministerial Statement (August 2021) which remains in force.
- 4.23. NPPF195 stresses the availability of:

a sufficient choice of school places ... to meet the needs of existing and new communities.

It goes on to require LPAs to:

take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education.

Accordingly, LPAs should:

- a) give great weight to the need to ... expand schools through ... 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.*

- 4.24. The *Policy Statement – planning for schools development* (August 2011) sets out the government’s commitment to support the development of state-funded schools and their delivery through the planning system. It states:

The Government believes that the planning system should operate in a positive manner when dealing with proposals for the creation, expansion and alteration of state-funded schools,

- 4.25. It goes on to set out principles that place great emphasis on favourable consideration of school-related planning applications – including a presumption in favour of state-funded school development and attaching significant weight to the need to develop (extend) state-funded schools.
- 4.26. The Ministerial Statement therefore establishes a presumption in favour of the THPS expansion. At the same time, the NPPF indicates the need for a choice in school provision. The local data show very strong parental preference for four out of the five primary schools in NW Caversham. The overall 4% surplus capacity in the five schools lies within the DfE allowance of 5%.
- 4.27. Increasing the THPS PAN would not therefore lead to “overheating” of the school at the expense of others in the NW Caversham area. The application simply aims to put THPS on the same basis as any other 2FE primary school.

5. TRANSPORT

- 5.1. The application is accompanied by a Transport Assessment [TA] prepared by Robert West, alongside a revised Travel Plan [TP].
- 5.2. The TA notes that the school is accessed via the Mapledurham Playing Fields pavilion car park using a private access road off the A4074 Upper Woodcote Road, with the pavilion car park used as a drop-off and pick-up area for the school. There is also pedestrian and cycle access from Chazey Road to the south along improved footways delivered through the related playing fields improvements. These arrangements were all established in the original planning permission.
- 5.3. The pre-application advice included comments and questions from the RBC Transport Development Control Manager.
- 5.4. It is important to emphasise that there is no proposed extension to the school catchment area as a result of this proposal. The TA shows (Table 4.4 and Figure 4.1) that the majority of pupils live within the school's designated area – 96% within 2km, with a few beyond that being a legacy of the school's previous temporary location in Gosbrook Road.
- 5.5. The TA reviews the existing conditions on the Site and in the surrounding area. Observations of pupil, parent and staff behaviour are made, augmented (as suggested by the pre-application comments) by a video survey to supplement hands-up surveys carried out by the school. These all combine to show that a significant majority of pupils (88%) arrive by non-car means and that the pavilion car park has ample capacity for those that do come by car. These trips are mitigated by a range of breakfast and after-school activities that spread arrivals and departures. A catchment analysis suggests that there is scope for increasing the proportion of pupils travelling by walking, cycling and scooters in the future.
- 5.6. While a larger proportion of staff drive to school, the staff car park operates well, though there is some double-parking towards the end of the day. No increase in staff numbers is required as a result of this proposal.
- 5.7. The TA goes on to assess the potential impact of the proposed increase in pupil number from 350 to 420. It demonstrates that there would be a negligible increase in car trips (+9) and that, spread across the peak period as observed, the increased demand would be indiscernible. There is ample

capacity in the pavilion car park to accommodate these additional movements. In any case, it is anticipated there would be fewer actual additional car trips owing to siblings in the school population.

- 5.8. The increase in pedestrian (+49) and cycle/scooter trips (+13) (total +62) would similarly be spread across the morning and evening peak and along multiple routes. The additional 70 pupils would suggest the need for an additional 4 cycle/scooter parking spaces, but, based on observation of current use of existing facilities, no additional provision is required (ie parents take cycles/scooters home. This can be monitored through the STP and any requirement secured by way of planning condition as pupil numbers increase over time, rather than being provided immediately.
- 5.9. A comprehensive Travel Plan is in place (the most recent dated Spring 2023), as approved in accordance with condition 21 of the original permission (RBC ref: 210748). As the transport officer commented, this is operating well in promoting the use of non-vehicular means for the journey to/from school.
- 5.10. The application is accompanied by an updated TA that addresses the limited issues arising from the increase in PAN. The various measures to mitigate the impact of the proposal are already in place. The main change is to augment management and supervision of the use of the pavilion car park.

Planning merits

- 5.11. NPPF 95b) advises LPA to “work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.” The school has sought to do this through its seeking pre-application advice and receiving the comments on the transport officer.
- 5.12. The pre-application advice also references the relevant RBLP policies against which this aspect of the proposal should be assessed.
- 5.13. Policy CC6: *Accessibility and the intensity of development* sets out a general policy relating the scale and density of development to its level of accessibility by walking, cycling and public transport. In this case, THPS is an existing school that serves a local catchment. It is expected that additional pupils would come from the school’s designated area; no increase in the catchment area is proposed. Indeed, the TA suggests there is scope for increasing access by non-car modes.

- 5.14. Policy TR1 requires development to contribute to the latest transport strategy, and to make appropriate provision for access by all modes of transport. The TA shows that the small increase in journeys on foot, cycling, by scooter or by car can all be easily accommodated on existing transport infrastructure. There is an existing issue regarding the location of the pedestrian crossover on the eastern side of the pavilion access road that is to be addressed separately under the s278 agreement with the original planning permission – but this is unrelated to the current proposed increase in PAN.
- 5.15. Similarly, the proposal accords with the requirements of Policy TR3: *Access, traffic and highway-related matters*. There is no new or altered access to the highway network required and the number of additional trips generated is minimal.
- 5.16. Additional cycle/scooter parking in line with the Revised Parking Standards and Design SPD (August 2011), p25 could be provided, but there is currently spare capacity in the existing cycle/scooter parking area.
- 5.17. Overall, the proposal accords fully with local policy requirements in relation to transport. The proposal will have negligible transport impact. Indeed, the whole purpose of the school was to serve the NW Caversham catchment and thereby reduce travel distances to other primary schools in adjoining parts of Caversham, with concomitant negative transport impacts.

6. NOISE

- 6.1. The application is accompanied by a Noise Impact Assessment [NIA] prepared by ACCON. They also prepared the noise assessment for the original school application.
- 6.2. At the outset, the NIA notes the pre-application comments provided by the Environmental Health Officer pointing to complaints received relating to noise from the outdoor activities at the school, notably the playground and MUGA, and measurements suggesting noise levels in adjoining residential gardens approaching WHO limits for external amenity areas. They express concern for any increase in this noise level or the length of time it is experienced arising as a result of the increase in pupil numbers, and suggest the acoustic treatment to the MUGA boundary might be feasible.
- 6.3. The NIA sets out the policy background to noise assessment set out in The Noise Policy Statement for England [NPSE], Planning Practice Guidance, RBLP Policy EN16, and noise guidance (BS8233). BS8233 does not set limits for external noise levels but refers (para 7.7.3.2) to a desirable noise level in gardens not exceeding 55dB $L_{Aeq,T}$. Nor are there specific noise criteria relating to noise from playgrounds or sports pitches, but the WHO also refers to an ambient noise level of 55dB $L_{Aeq,T}$ that prevents “annoyance in external amenity areas.
- 6.4. ACCON undertook noise measurements on two days of noise from the recreational play areas during the lunch period (1150-1320) and after school when after-school clubs are run (1455-1625). Classes are staggered over lunchtime and only a proportion of pupils attend after-school clubs. The noise measurements were taken just north of 28 (MP1) and just south of 29 Hewett Avenue (MP2), these being the two closest residential properties (“noise-sensitive receptors”). It is noted that MP2 lies close to the new children’s playground within Mapledurham Playing Fields and this may be the source of play-related noise not associated with THPS.
- 6.5. In summary, the noise survey shows that:
 - Measured lunchtime noise levels at MP1 and MP2 (equivalent to 28 and 29 Hewett Avenue) were 52dB and 58dB $L_{Aeq,T}$ respectively, comparable to the 54 and 55dB predicted in ACCON’s 2017 noise study
 - Measured after-school levels would be 51dB and 56dB $L_{Aeq,T}$ respectively

- Measured noise levels at MP1 (to the north of 28 Hewett Avenue) would not exceed WHO criteria
- Measured noise levels at MP2 (to the south of 29 Hewett Avenue) would exceed WHO criteria – though they would fall well below the normal 55dB $L_{Aeq,16}$ (measured over 16 hours)
- The inclusion of an additional 70 pupils (who would rarely if ever occupy the external spaces at the same time, being spread across all 7 school years) would increase noise levels of a period by 0.8dB which would not be perceptible by neighbouring occupiers
- Internal noise levels at 28 and 29 Hewett Avenue would fall well within BS 8233 criteria

6.6. It is important to note, of course, that the times when these noise levels are experienced are limited to times when the external spaces are in use – ie only at lunchtimes and during after-school club activities when the weather is good enough. Throughout the rest of the day, outside term time and when pupils are kept indoors owing to poor weather, noise levels fall well below WHO and other limits. Use of the external spaces is well-managed. Lunchtime use is staggered across classes and the noise limit (55dB $L_{Aeq,5min}$) was exceeded only during a 15-minute period at position MP1 (1235-1250) and for 55 minutes (1210-1305) at MP2. That limit was not exceeded after school at MP1 and was exceeded on 7 separate occasions at MP2, reflecting the use of the space by particular groups for particular activities on the days surveyed. As noted above, usual noise limit over a 16-hour day 0700-2300 (55dB $L_{Aeq,16}$) is not infringed.

6.7. Nor would an additional 70 pupils ever likely inhabit the external spaces at the same time. And even if they did, the additional noise would be imperceptible. In any case, the numbers of pupils attending after-school activities/clubs ranges from 50-90 (see TA Table 4.1), so it is clear that noise levels do not appear to vary much with numbers of pupils. The NIA accordingly concludes that:

... the proposed increase in the PAN would not have an adverse noise impact on the occupiers of neighbouring residential properties. [p23]

Planning merits

6.8. In these terms, therefore, the proposal accords with the relevant test in RBLP Policy EN22: "it would not be damaging to ... sensitive receptors through ... noise pollution...".

- 6.9. The pre-application advice referred also to the potential use of acoustic fencing. Given that the proposal would have no adverse impact on neighbours and accords with Policy EN22, no such requirement arises.
- 6.10. The pre-application advice also refers to additional mitigation in relation to the MUGA lighting. This issue does not form part of this application. In any case, the MUGA lighting was approved by RBC by notice dated 27 April 2020 (RBC ref: 191016).

7. SUMMARY AND CONCLUSION

- 7.1. This Planning Statement supports a planning application by The Heights Primary School at 129 Upper Woodcote Road, Reading RG4 7LB for an increase in its published admission number from 350 to 420.
- 7.2. THPS is located to the north-west of the Mapledurham Playing Fields, sharing its main access from Upper Woodcote Road and adjoining the pavilion, car park and tennis club (see Fig 1). The Site was leased by the Education Funding Agency in 2018 for the new school while enabling significant improvements to the playing fields and its facilities. The original planning permission for the school (14 August 2018, RBC ref: 171023, revised on 25 February 2019, RBC ref: 182200) limits the number of pupils the school is allowed to accommodate – though the physical building was designed to meet class sizes of 30.

The business case

- 7.3. As originally set up, the 2FE school with 350 pupils was based on an educational model of 25 pupils/class, supported by the Department for Education/Education and Skills Funding Agency. The DfE/ESFA now only supports new free schools with a minimum 2FE of 30 pupils, a total capacity of 420 pupils.
- 7.4. This is significant because, until 2020, THPS received additional funding to support core functions until it reached full capacity, and now operates only with emergency ESFA support. It also receives the lowest per pupil Government funding (the Dedicated Schools Grant) of any RBC primary. A condition of emergency support was receipt of advice from a School Resources Management Adviser (who reports to the DfE), most recently in Spring 2023. The SRMA's recommendations include exploration of the benefits of joining a multi-academy trust, retendering of some external contracts, and, most importantly, an increase in its PAN to 420 which he states "is the root cause of the school's current financial challenges".

School place planning

- 7.5. The LEA's pre-application comments suggest that there is sufficient primary provision in Caversham for the foreseeable future and is need for further school places. The data relied upon, however, do not reflect the position in NW Caversham. In 2023, four of the five schools in NW Caversham (the exception being Thameside) were over-subscribed for YR admissions, while the schools in the rest of North Reading (including the two Catholic

primaries) were undersubscribed. Overall there is a 4% spare capacity in NW Caversham, within the 5% DfE guideline that allows for parental choice.

- 7.6. RBLP Policy OU1 supports the intensification of schools subject to other plan policies – notably in this case the absence of any noise or transport policy conflict, alongside the fact of no physical change to the school building or site.
- 7.7. The increased PAN is also supported by NPPF195 which promotes choice, a proactive approach by LPAs, including giving great weight to the need to expand schools, and resolving issues at pre-application stage. This positive approach is also strongly encouraged by the 2011 schools policy statement.
- 7.8. This amounts to a presumption in favour of the THPS PAN expansion. Alongside this, the potential transport and noise impacts have been carefully assessed.

Transport

- 7.9. The submitted TA shows that the proposed increase in PAN will have negligible transport impacts. No increase in the catchment is proposed or needed. On the contrary, on-site surveys show that the vast majority of pupils arrive at school on foot or by cycle/scooter. A small number travel by car but the numbers involved are easily accommodated in the drop-off area incorporated into the new pavilion car park. This situation will not change with a maximum additional 9 car-based journeys easily accommodated over the arrival and departure periods, compared with some 62 more pedestrian or cycle/scooter trips.
- 7.10. The application therefore accords with RBLP Policy CC6 which relates development to its level of accessibility by walking, cycling and public transport. It also accords with Policy TR1 (transport strategy) and TR3 (highway network) since no new access is required and the number of additional trips generated is minimal. Additional cycle/scooter parking in line with the parking SPD can be accommodated as necessary.
- 7.11. Overall, the proposal accords fully with local policy requirements in relation to transport. The proposal will have negligible transport impact. Indeed, the whole purpose of the school was to serve the NW Caversham catchment and thereby reduce travel distances to other primary schools in adjoining parts of Caversham, with concomitant negative transport impacts.

Noise

- 7.12. The submitted Noise Impact Assessment reports on noise surveys carried out close to the two adjoining bungalows at 28 and 29 Hewett Avenue. These show that existing external noise levels meet the WHO criterion of 55dB _{LAeq,16} (measured over 16 hours) though there is some exceedance south of 29 Hewett Avenue over shorter periods during the lunchtime and after-school periods. Outdoor use of playspace is in any case staggered over the lunch period and involves a minority of pupils after school.
- 7.13. Importantly, the inclusion of an additional 70 pupils (who would rarely if ever occupy the external spaces at the same time, being spread across all 7 school years) would increase noise levels over a period by 0.8dB which would not be perceptible by neighbouring occupiers
- 7.14. Internal noise levels at 28 and 29 Hewett Avenue would fall well within BS 8233 criteria.
- 7.15. The proposal accords with the relevant test in RBLP Policy EN22 not to damage sensitive receptors – ie residential occupiers.
- 7.16. While the pre-application advice referred to the potential use of acoustic fencing, policy compliance suggests no such requirement arises.

Conclusion

- 7.17. Overall, it is clear that there is a clear imperative for the proposed increase in PAN, reflecting also the over-subscription of primary schools in NW Caversham. There are no transport or noise impacts that would indicate otherwise. The planning balance lies firmly in favour of permitting the development.
- 7.18. The original planning permission was subject to a s106 agreement. It is not anticipated that the revised PAN would trigger the need for any amended obligations.

APPENDIX:

EXTRACT FROM SCHOOL PLACE PLANNING ESTIMATES (SCAP22, DFE)

NORTH READING PRIMARY SCHOOLS 2022/23 – 2025/26

	2022/23				2023/24				2024/25				2025/26				2025/26			
	Forecast	Capacity	Difference	%	Forecast	Capacity	Difference	%	Forecast	Capacity	Difference	%	Forecast	Capacity	Difference	%	Forecast	Capacity	Difference	%
Total	2775	3080	-305	-9.9%	2725	3080	-355	-11.5%	2690	3080	-390	-12.7%	2705	3080	-375	-12.2%	2710	3080	-370	-12.0%
YR	390	440	-50	-11.4%	380	440	-60	-13.6%	390	440	-50	-11.4%	405	440	-35	-8.0%	405	440	-35	-8.0%
Y1	380	440	-60	-13.6%	390	440	-50	-11.4%	380	440	-60	-13.6%	390	440	-50	-11.4%	405	440	-35	-8.0%
Y2	405	440	-35	-8.0%	380	440	-60	-13.6%	390	440	-50	-11.4%	380	440	-60	-13.6%	390	440	-50	-11.4%
Y3	390	440	-50	-11.4%	395	440	-45	-10.2%	370	440	-70	-15.9%	380	440	-60	-13.6%	370	440	-70	-15.9%
Y4	380	440	-60	-13.6%	390	440	-50	-11.4%	395	440	-45	-10.2%	370	440	-70	-15.9%	380	440	-60	-13.6%
Y5	415	440	-25	-5.7%	380	440	-60	-13.6%	390	440	-50	-11.4%	395	440	-45	-10.2%	370	440	-70	-15.9%
Y6	415	440	-25	-5.7%	410	440	-30	-6.8%	375	440	-65	-14.8%	385	440	-55	-12.5%	390	440	-50	-11.4%