

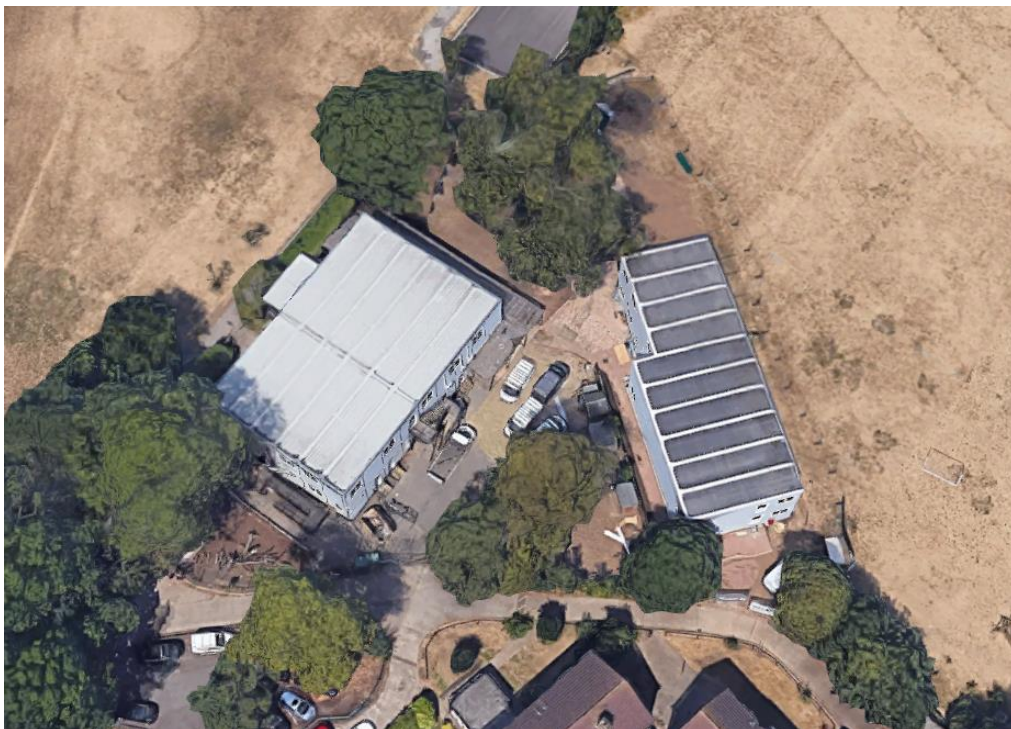


Jones Lang LaSalle Incorporated

Planning Statement Design & Access Statement Statement of Community Involvement

The Heights Primary School, 82 Gosbrook Road, Caversham, Reading, Berkshire RG4 8BH

April 2020



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Cover Photo Source: Google Maps

Executive Summary

This planning statement is submitted in support of a planning application for the retention of two existing school modular buildings and associated facilities on the subject site until August 2021. This planning application is made by the Department for Education (DfE) on behalf of The Heights Primary School Trust.

The current proposals are for the retention of two 2-storey temporary modular units and associated facilities related to the site's continued use as a school (Class D1) for a period of approximately one year, to 31st August 2021. The site is already occupied by The Heights Primary School and has been since 2014. The existing planning permission relating to the site requires the on-site buildings to be removed by 31st August 2020, under condition 2 of full planning permission granted in September 2018, reference 180552.

Planning permission is sought until August 2021 to continue to provide temporary facilities at the site until such time as The Heights Primary School's permanent school facilities are ready for occupation. The permanent school was approved by Reading Borough Council (RBC) under planning permission reference 171023 in August 2018.

The site is located in the north of the Borough and is bounded by a number of community and leisure facilities. Its wider area is primarily residential in character. The site is set back from Gosbrook Road behind a three-storey residential building and is located within a copse of mature and semi-mature trees. The site accommodation comprises two 2-storey temporary modular units approved on a temporary basis under application reference 180552.

The proposed temporary accommodation will have no adverse impact on local amenity and The Heights Primary School has successfully occupied the subject site for approximately five years at the time of writing. This current application proposes no additional accommodation above that which currently occupies the site. The lawful use of the site is Class D1. The same development as proposed in this planning application was approved in August 2018. The current application simply seeks to extend the temporary period so that the use can continue, and the buildings can remain on site for a further academic year, until 31st August 2021.

To engage with the local community, a community consultation exercise was undertaken. 1,027 local residents and businesses were consulted in addition to local organisations and Councillors. A total of seven responses were received, which have been carefully considered by the applicant's team prior to the submission of this planning application.

The design of the proposal is as existing and will ensure there will be no increase in flood risk to the site and surrounding area. The transport and highways implications have been appraised and consider that there will be no detrimental impact on the local highway network as a result of the use of the additional temporary accommodation for a further one academic year. Reports also confirm that the proposed development will have no adverse impact on neighbouring receptors from noise nor will the proposals have a negative impact on air quality. Tree, landscape and ecological aspects alongside construction management impacts were considered at the time the units were installed and given no new operational development is proposed, there are considered to be no adverse impacts in respect of these issues. Should permission be granted, the units will simply remain in place until 31st August 2021.

The Planning Statement concludes that the retention of the existing temporary modular buildings should be supported by RBC until August 2021 by which time it is anticipated the school's permanent premises will be complete.

1 Introduction

The Applicant

- 1.1 JLL has been appointed by the Department for Education (DfE) ('the Applicant') to submit a full planning application to secure the continued use of the current two 2-storey modular buildings and associated facilities at 82 Gosbrook Road, Caversham, Reading RG4 8BH for The Heights Primary School (Class D1).
- 1.2 The current planning permission requires the buildings and facilities to be removed from the site by August 2020. This full planning application seeks permission for the retention of these buildings for a further year to August 2021 after which the buildings will be removed from the site.
- 1.3 This report provides an assessment of the proposed temporary extension against the provisions of the statutory Development Plan covering the site, national planning policy and other material considerations.

The Proposed Development

- 1.4 The proposed development seeks the retention of the existing temporary modular buildings in association with the site's established use as a primary school (Class D1) for an additional limited period of one year (until 31st August 2021) whilst the school's permanent accommodation is constructed and completed.
- 1.5 The formal description of the development which is subject to the application for temporary accommodation to Reading Borough Council (RBC) is:

"Retention of two modular school accommodation blocks (Use Class D1) and associated facilities for use by the Heights Primary School"

Contents

- 1.6 The Statement is set out as follows;
 - Section 2 – sets out the background to the proposals and the education needs case justifying the development;
 - Section 3 – provides a description of the site, the surrounding area and the proposals;
 - Section 4 – summarises the planning history of the site;
 - Section 5 – describes the proposed development;
 - Section 6 – provides a summary of community consultation undertaken;
 - Section 7- provides a design and access statement;
 - Section 8 – summarises the relevant national, regional and local planning policies;

Section 9 – sets out the case for planning permission;

Section 10 – presents the overall conclusions.

Supporting Reports

1.7 In addition to this Statement, the following are submitted in support of the planning application:

- Planning application forms (including ownership and agricultural certificates) and CIL forms, signed and dated;
- Drawing pack, prepared by HCC and Reds10, including:
 - Site Location Plan (Drawing no. E03620-A-PL-1000);
 - Existing elevation (Drawing nos. 171111-RH-EE-A and 5249-001-G);
 - Proposed elevations (Drawing no. 171111-RH-PE-A and 5249-001-G);
 - Existing general arrangement (Floor Plans) (Drawing no. 171111-RH-GA-C and 5249-001-G);
 - Proposed general arrangement (Floor Plans) (Drawing no. 171111-RH-GA-A and 5249-001-G);
 - Existing site plan (Drawing no. E03620-A-PL-1021);
 - Proposed site plan (Drawing no. E03620-A-PL-1020);
 - Proposed section (Drawing no. 171111-RH-SC-A);
- Design and Access Statement (included within this Planning Statement);
- Air Quality Statement, by RPS;
- Flood Risk Assessment, by RPS;
- Ecological Appraisal, by RPS;
- Acoustic Report, by RPS;
- Noise Technical Note, by BWB;
- Transport Assessment, by RPS
- Transport Technical Note, by BWB; and
- School Travel Plan.

2 The Heights Primary School and Educational Case

- 2.1 The Heights Primary is a Government funded, non-selective, inclusive 2 form of entry (FE) primary school for the Caversham Heights / Mapledurham area. The Heights Primary School Academy Trust was formed in 2012 in response to a public consultation exercise held by RBC - “*Let’s Talk Education*” seeking solutions to an identified oversubscription of Primary Schools in Caversham. At the time of the consultation there was a projected under provision of 60 primary school places for the year 2014 / 15.
- 2.2 The school opened in September 2014 with 66 pupils and was expanded in 2017 with further accommodation on site (granted by planning permission reference 151283). In 2018, the school was further expanded to include an additional two-storey modular unit (reference 180552). The current number of pupils on the school roll is 328. In 2017 the School was graded Outstanding by Ofsted in respect of its overall effectiveness.
- 2.3 A planning application for the permanent school facility was submitted in June 2017 (reference 171023) by the Education Funding Agency (now subsumed within the DfE). Planning permission was granted in August 2018 and at the time of writing, construction of the permanent facilities is underway.
- 2.4 Whilst construction works at the permanent site are progressing, the permanent site will not be completed by August 2020, as was originally envisaged. The current application is therefore required to bridge the time period between the current planning permission for the ‘temporary’ site expiring in August 2020 and the completion of the permanent school facilities, which is expected to be before August 2021.

The Department for Education

- 2.5 The DfE is responsible for children’s services and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
- 2.6 Further information regarding the Free School Programme can be found here: <https://www.gov.uk/government/collections/opening-a-free-school>

3 The Site and its Surroundings

The Site

- 3.1 The application site comprises approximately 0.3 hectares of land in use as a school (Class D1). The site remained vacant from April 2009, when Caversham Nursery School vacated the site, until September 2014 when The Heights Primary School moved in on a temporary basis whilst their permanent site was sought.
- 3.2 The application site is located off the north side of Gosbrook Road. The site is set back from Gosbrook Road, behind residential flatted accommodation, and bounded by a number of mature trees on all sides. Two trees to the north of the site are covered by Tree Preservation Orders (TPOs).
- 3.3 Adjoining the north of the site is Westfield Road Playground. The east of the site is bound by residential flatted accommodation and the west of the site is bound by a recreation ground. There is a pedestrian footpath that runs along the site's western boundary.
- 3.4 The site has reasonable accessibility by public transport. There are east and west bound bus stops (routes 25, 27, 82, 146A, 800, X38) within approximately 50m of the sites entrance, increasing the sites wider accessibility.

The Surrounding Area

- 3.5 The site's immediate surroundings comprise recreation, education, places of worship and residential accommodation. Access to the school site is via a single track road running broadly north-south from Gosbrook Road. To the site's immediate east is a three-storey pitched roof residential development, accessed off the same track as that which serves the school. The track forms a loop and continues around the residential development and emerges further east along Gosbrook Road.
- 3.6 North-east of the Heights Primary School are the playing fields of St. Anne's Catholic Primary School and beyond this to the east, the St. Anne's school buildings themselves. Our Lady and St. Anne's Roman Catholic Church is located directly north of St. Anne's School.
- 3.7 The wider area is predominantly characterised by residential dwellings. As outlined, the flats bounding the site to the east are three storeys under a pitched roof. Otherwise buildings are typically single storey terraces under a pitched roof.

4 Relevant Planning History

- 4.1 Table 4.1 below outlines the planning history of the site. These applications confirm that the site's lawful use is a non-residential institution (Class D1). During consideration of the certificate of lawful use/development application (ref: 131353), it was considered by officers *“that there is insufficient evidence to conclude that the use has been abandoned, or that the owner intends to abandon the use.”*
- 4.2 Furthermore, applications 180552 and 151283 indicate the principle of temporary educational accommodation is accepted on the site.

Table 4.1 Site Planning History Source: Reading Borough Council's online planning register

Application Reference	Description of Development	Decision	Decision Date
180552	Extension to the existing planning approval ref 151283 until 31 st August 2020. Erection of a new build 2 storey, 6 classroom modular unit on part of the St Anne's School site, to allow the school to expand towards a capacity of 325 pupils on the temporary school site until 31 st August 2020. Associated external works.	Conditional Permission	27 th September 2018
181035	Fencing off an area of the Westfield Road Recreation Ground for educational use during school hours for use by the Heights Primary School.	Conditional Permission	27 th September 2018
151283	Construction of a first-floor classroom extension over existing single-storey classrooms to form enlarged temporary school, for an extended period until 31 August 2018.	Conditional permission	10 th March 2016
140940	Demolition of existing nursery school buildings and construction of a temporary single storey modular unit and minor external works associated with the site's use as a non-residential institution (Class D1) for 2 years.	Conditional permission	25 th July 2014
131353	Application for a certificate of lawful use as a children's nursery school (Use Class D1).	D1 use considered lawful (on the balance of probabilities)	27 th January 2014
030701	Internal alteration to form disabled toilet and extension to form an admin office.	Permitted	6 February 2004
030651	Secure shed for storage of play equipment	Permitted	6 January 2003
01082	Erection of a canopy to form covered area.	Permitted	27 June 2001

010530	Conservatory extension to nursery school.	Permitted	04 April 2001
940809	Single storey rear extension with hardstanding.	Permitted	23 August 1994

5 The Proposals

- 5.1 The following section outlines the details of the development proposal. Further details are set out in the Design and Access Statement.
- 5.2 The formal description of development which is subject to the application for full planning permission to the RBC is:

“Retention of two modular school accommodation blocks (Use Class D1) and associated facilities for use by the Heights Primary School”

The Heights Primary School: Operation

- 5.3 The Heights Primary School is a 2 forms of entry primary school for children aged from 4-11 years. The school opened on this temporary site in September 2014. This application seeks permission for the retention of the existing two 2-storey modular units and associated facilities for a temporary period until 31st August 2021 at which point the school’s permanent facilities are expected to have been completed. The site will then be cleared and left in a tidy condition.
- 5.4 There are currently 328 pupils and 37FTE staff at the school. For the 2020/2021 academic year there will be a small increase in pupil numbers to 353 (an increase of 25 pupils) and in staff to 40FTE (an increase of 3FTE staff). The increase in numbers is because the school for the 2020/2021 academic year will have two full forms of entry across every year group (50 pupils per year group). When the school originally opened, the school had capacity for a single Year 1 class only (25 pupils). That original Year 1 class is now in Year 6 and therefore will leave at the end of the 2019/2020 academic year, providing two full forms available by default.
- 5.5 The application proposes that the school will continue to operate as it has done to date. The school will rely on some dual use of facilities at the St. Anne’s Primary School nearby (northwest of the site). This will include shared access to St Anne’s school field at certain times and days of the week for P.E. for the younger children and one or two sport based After School Clubs.
- 5.6 The school will also continue to utilise a fenced-off area of Westfield Road Recreation Ground during school hours. This fenced-off area was approved concurrently with the previous planning permission for the temporary buildings, under RBC reference 181035. A separate planning application is being submitted to enable continued use by the school of this fenced-off area up until August 2021, to run parallel in timescales to this planning application.
- 5.7 The school’s permanent site is currently under construction following the grant of planning permission in August 2018 (ref 171023).

Reinstatement of site

- 5.8 Once the buildings and structures have been removed, the contractor will complete the disconnection of utilities and services, remove footings/foundations and make good alongside any necessary works required to leave the site in a condition deemed acceptable to the Council. It is expected that reinstatement of the site will take approximately 8 weeks. The reinstatement works are proposed to be in line with condition 2 of the previous planning permission 180552.

6 Statement of Community Involvement

- 6.1 The DfE has been committed to consulting with the local community and with key stakeholders as part of these development proposals.
- 6.2 To engage with the local community, a consultation leaflet was sent to a total of 1,027 residential and business addresses in the immediate surroundings of the site. The area of distribution was selected based on a review of those who had responded to previous planning application consultations for the site as well as feedback received from Reading Borough Council Officers. All immediate roads surrounding the site were consulted. The area of distribution is outlined in figure 5.1 below.

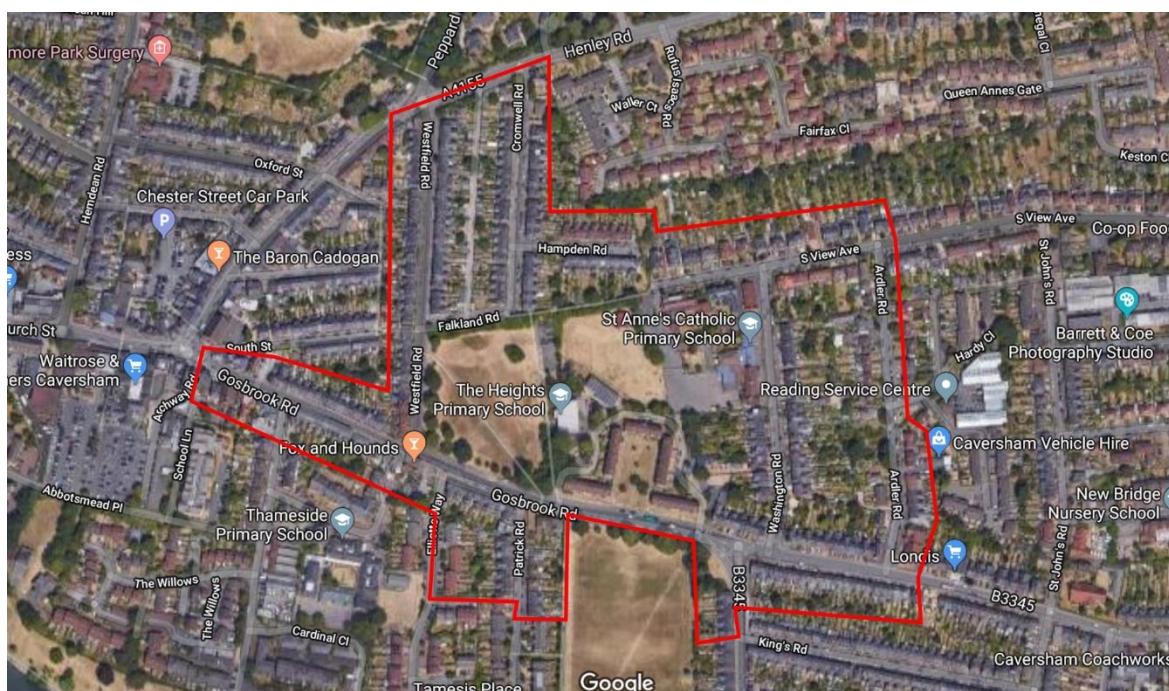


Figure 6.1. Consultation leaflet distribution area. Source Google Maps.

6.3 The consultation leaflet was distributed to residents on 31st January 2020 with an opportunity to provide comments for approximately 2.5 weeks until 18th February 2020. The consultation leaflet was also distributed to the following local interest groups and local councillors:

- Ward Councillors- Cllrs Adelle Barnett-Ward Richard Davies and Ayo Sokale;
- Caversham and District Residents Association;
- Caversham Globe; and
- Local MP- Mr. Matt Rodda.

6.4 A copy of the consultation leaflet is provided below for reference.

Temporary Accommodation for The Heights Primary School

The Heights Primary School has been operating from the former Caversham Nursery site at Westfield Road Recreation Ground on Gosbrook Road for a number of years whilst a location was found for the school's permanent home.

The permanent site has now been secured with planning permission granted for the school to be built at Mapledurham Playing Fields (originally in August 2018 Reading Borough Council Ref. 17/1023 and subsequently varied in February 2019 Ref. 18/2200).

Whilst construction of the permanent accommodation has now started it will not be ready for the start of the 2020/2021 academic year. We realise that this will be disappointing news, but with work underway, the intention is to move the school to its permanent home as soon as possible.

Under the existing planning permissions, the School has use of the Westfield Road site on a temporary basis until 31st August 2020 (Reading Borough Council Ref. 18/0552 and 18/1035).

It is therefore the intention to submit two planning applications to extend the time period for the use of the temporary site and fenced off area of the adjacent Westfield Road Recreation Ground for up to one further year, until 31st August 2021.

In advance of submission of the two planning applications to Reading Borough Council, we would welcome your feedback and comments on the proposed planning applications.

Please provide any feedback or comments via email to the address below by 18/02/2020. There will also be an opportunity to comment on the planning applications to Reading Borough Council once the applications are submitted in the coming weeks.

the.heights@eu.jll.com





Department for Education

Figure 6.2. Consultation Leaflet.

6.5 A total of seven consultation responses were received and these are summarised in table 5.1 below:

Table 6.1. Summary of public consultation responses.

Response	Summary
1	Concerns regarding parent parking and knock-on congestion on the local road network. Suggests that the fenced-off part of Westfield Recreation Ground should be removed as it cannot be used in winter due to poor pitch conditions.
2	Concerns regarding additional congestion caused by the school on local road network
3	Would like to see the application include details to confirm the reinstatement of the grounds and the trees/hedge and mesh fence which was removed to make way for the temporary classrooms between St Anne's playing field and Elizabeth House.
4	Supports the application but there is a need to repair and improve the north-south footpath that lies adjacent to the western boundary of the school site.
5	Concern regarding a faulty alarm at the school and its impact on neighbouring residential properties. Concern regarding additional congestion caused by the school on the private access road serving the site and its impact on the road condition.
6	No objection raised.
7	Concerns regarding additional congestion caused by the school on local road network.

- 6.6 As outlined in Table 6.1, the feedback from residents outlined issues regarding parking and congestion as a result of the proposed development. These issues have been addressed through the applicant commissioning BWB to produce a Transport Technical Note which has assessed the impact of the proposals on car parking and on the local highway network. A summary of the Technical Note is provided in section 9 of this report and confirms that adequate car parking will be provided and there will be no adverse impact on the local highway network as a result of the proposed development.
- 6.7 The issue in relation to repairing the footway is an RBC matter. The faulty fire alarm issue is an operational matter understood to have now been resolved.

7 Design and Access Statement

Introduction

- 7.1 This Design and Access Statement has been prepared in support of the full planning application for the retention of the existing two 2-storey modular school accommodation blocks on the site. There are no new external works proposed as part of this current application so the current situation on site will, if the application is approved, simply remain after August 2020, to 31st August 2021. A limited uplift in pupil (increase of 25 pupils) and staff numbers (increase of 3FTE staff) is expected for the 2020/2021 academic year.

Use

- 7.2 The application relates to continued use of the existing on-site accommodation for use as a primary school for an additional one year. The site was previously used as a Nursery School (D1). There is therefore no change of use as part of this application. A certificate of lawful use established the use a D1 use in 2014.
- 7.3 The school will rely on some dual use of facilities at the St. Anne's Primary School nearby (northwest of the site). This will include shared access to St Anne's school field at certain times and days of the week for P.E. for the younger children and one or two sport based After School Clubs.

Amount

- 7.4 The following accommodation (as existing and proposed) will meet the operational requirements of the school:
- General teaching classrooms;
 - School hall and studio space;
 - Breakout and group rooms;
 - Pupil and staff WCs, including accessible WCs;
 - Reception, staff room and teacher offices;
 - Ancillary storage space.

Layout

- 7.5 The site is accessed from the north of Gosbrook Road and is surrounded by hedgerow and mature trees around its perimeter. On the south east boundary of the site there are domestic properties, but the remainder of the site is bounded by fields and recreational areas.
- 7.6 The 'red line' site area comprises approximately 0.3 hectares. The existing boundary fence is well maintained. As part of the 2014 installation works a new internal 1,800mm chain link mesh fence to BS1722-1 was installed which provides safe outdoor play area for the children and provides a designated drop of and pick up area for pedestrians/ parents to collect/drop off children. This fence demarks the school and provides a secure internal boundary and will be unaffected by the proposals.

- 7.7 The existing modular accommodation provided have ramps and steps to their main entrances and are fully accessible. Footpath access from the south boundary comprises a level approach right up to the block entrance.

Scale

- 7.8 The proposed modular units are set back significantly from all surrounding roads and properties ensuring, in terms of scale and massing, they are not visually dominant on the street scene and do not have an adverse impact on residential amenity.

Landscaping and Boundary Treatment

- 7.9 There is extensive existing landscaping on site and due to the nature of the proposals, there are no proposed additional landscaping or boundary treatments required to the existing site.

Appearance

- 7.10 The external finishes of the existing (proposed) modular accommodation blocks consist of light grey Kingspan microrib panels with UPVC windows and doors. Rainwater goods are UPVC. The fire escapes at the southern and northern facades are metal, painted grey.
- 7.11 For the full extent of the external finishes of the buildings and how the buildings sit within the site please refer to the application drawings.

Access

- 7.12 Existing access arrangements to the site will remain. The school is accessed via the existing pedestrian footpaths from Gosbrook Road and Westfield Road.
- 7.13 As outlined, both modular accommodation units can be accessed via ramps and stepped access and therefore both are wheelchair accessible.

Waste Strategy

- 7.14 The school is committed to reducing waste and recycle where possible. Remaining waste will be stored in domestic sized 'wheelie' bins in an enclosed container and wheeled to the new boundary for pick up within the site by the waste collection service provider.

Energy Efficiency Statement

- 7.15 The application is for a temporary time extension to two existing temporary modular buildings. No new operational development is proposed. It is therefore not proposed to incorporate renewable technologies such as solar photovoltaics and wind turbines installed as part of the development. The

financial and energy saving payback period on these technologies is anything between 7 – 15 years, therefore, these technologies are not viable for a temporary project of this nature.

- 7.16 However, the scheme will incorporate a number of energy efficiency measures that will reduce energy consumption and carbon dioxide emissions over the temporary period. These include:
- Lighting: Motion sensors will be fitted throughout to ensure lighting is only comes on when the rooms are occupied
 - Windows: Windows will be double glazed, sealed units comprised of 4mm clear float, 20 mm air gap, 4 mm low 'E' glass which achieves a 'U' value of 1.6 w/m2k

Sustainability Statement

- 7.17 The proposal is to retain two existing temporary modular buildings, there is no proposed use of new materials or any fresh operational development as part of this application. When originally installed, the pre-fabricated nature of the school buildings was in itself a sustainable form of construction.

8 Relevant Planning Policy

- 8.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that applications for development must be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 8.2 This section examines the planning policy most relevant to the proposals. It looks at factors relevant to new school development
- 8.3 The National Planning Policy Framework (NPPF) (published July 2018 with revised update in February 2019) sets out the Government's planning policy, alongside Planning Practice Guidance (PPG) and written ministerial statements.
- 8.4 The adopted Development Plan for this site comprises:
 - Reading Borough Local Plan (adopted November 2019).
- 8.5 Whilst not part of the adopted development plan, other material considerations which should be taken into account include RBC's Supplementary Planning Documents (SPD).

Allocations

- 8.6 Reading Borough Council's adopted Proposals Map confirms that the site is subject to the following designations:
 - Within an Air Quality Management Area;
 - Within the defined Reading settlement boundary;
 - Adjacent to a Major Landscape Feature (policy EN13);
 - Adjacent to an area of identified Local Green Space and Public Open Space (policy EN7); and,
 - Adjacent to an existing/proposed Green Link (policy EN12).



Figure 7.1: RBC's Proposal Map extract. Source: RBC.

- 8.7 A review of the current Environment Agency's (EA) 'Flood Map for Planning' shows that the site is within Flood Zone 3. Flood zone 3 comprises land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%), or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year.
- 8.8 The site is not located within a conservation area. There are no designated heritage assets nor any non-designated heritage assets within the immediate vicinity of the site.

National Planning Policy Framework (NPPF)

- 8.9 The National Planning Policy Framework (NPPF) is a material consideration and sets national governmental planning policy, alongside associated planning practice guidance.
- 8.10 The NPPF was adopted on the 24th July 2018 by the Government and replaced the previous version adopted in March 2012. Further revised updates to the NPPF were made on 19 February 2019. The Policy Framework is considered fundamental to Government reforms to promote economic growth and make the planning system more accessible.

General Approach

- 8.11 The NPPF sets out the Government's overarching economic, environmental, and social planning policies in England and how these are expected to be applied (paragraph 8). The NPPF does not change the statutory status of the Development Plan as the starting point for decision making, however it is a material consideration for local planning authorities in the determining of planning applications.

Educational Facilities

8.12 Paragraph 94 states that *“it is important that a sufficient choice of school places is available to meet the needs of existing and new communities”*. It states that local planning authorities 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.”*

Amenity

8.13 Paragraphs 91 and 127 note that planning decisions should ensure that developments create places that are safe, inclusive and accessible and with a high standard of amenity for users.

8.14 The NPPF also notes that planning decisions should ensure that new developments limit the impact of light pollution from artificial light on local amenity (Paragraph 180).

Design

8.15 In order to achieve good design, Paragraph 127 states that development should ensure that they:

- *“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;*
- *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- *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);*
- *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;*
- *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; and*
- *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

8.16 Paragraph 128 goes on to state that design quality should be considered throughout the evolution of a project and early discussions should be had between applicants, local planning authorities and those affected by proposals to ensure that high-quality design can be achieved as part of the design process.

8.17 Paragraph 131 states that *“in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.”*

Flood Risk

- 8.18 Paragraph 163 notes the following with regard to flood risk:

“when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment”.

Ground conditions and pollution

- 8.19 Paragraph 178 notes that developments should take into account their potential impact on ground conditions and any risks arising from land instability and contamination.

National Planning Practice Guidance: Use of Planning Conditions

- 8.20 NPPG on the use of temporary permissions outlines that *“it will rarely be justifiable to grant a second temporary permission (except in cases where changing circumstances provide a clear rationale, such as temporary classrooms and other school facilities).”*

Department for Communities and Local Government (DCLG) Policy Statement - Planning for Schools Development (August 2011)

- 8.21 In August 2011, the DCLG published a policy statement on the role of the planning system in supporting schools. This statement demonstrates that the Government is firmly committed to ensuring that there is sufficient provision to meet growing demand for state-funded school places, increasing choice and opportunity in state-funded education and raising educational standards.
- 8.22 It is expected that all parties will work together proactively from an early stage to help plan for state-school development and to shape strong planning applications.
- 8.23 The document sets out the Government’s strong policy support for improving state education. It identifies 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 development of state-funded schools, as expressed in the NPPF.
 - Local Authorities should give full and thorough consideration to the importance of enabling the development of state funded schools in their planning decisions.
 - Local Authorities should make full use of their planning powers to support state-funded schools applications.
 - Local authorities should only impose conditions that clearly and demonstrably meet the tests set out in Circular 11/95.
 - Local authorities should ensure that the process for submitting and determining state-funded schools’ applications is as streamlined as possible.
 - 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.
 - Appeals against any refusals of planning permission for state-funded schools should be treated as a priority.

- Where a local planning authority refuses planning permission for a state-funded school, the Secretary of State will consider carefully whether to recover for his own determination appeals against the refusal of planning permission.

8.24 The statement is noted as applying to both changes of use development and operational development necessary to the operational needs of the school.

Reading Borough Local Plan (adopted November 2019)

8.25 Policies within the development plan document relevant to the subject proposal are as follows:

General Approach

8.26 Policy CC1 (Presumption in Favour of Sustainable Development) states that a positive approach to considering development proposals will be taken that reflects the presumption in favour of sustainable development contained in the NPPF.

Community Facilities and Infrastructure

8.27 Policy OU1 (New and Existing Community Facilities) identifies that *“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. Proposals for additional development for further and higher education will only be acceptable where it can be demonstrated that it would not lead to a material increase in the need for student accommodation, or that it will be supported by an appropriate increase in existing or planned student accommodation.*

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, which should only be developed where:

- A) an assessment clearly shows the area to be surplus to requirements; or*
- B) the loss 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 needs for which clearly outweigh the loss.*

New community facilities should be located where there is a choice of means of travel (including walking and cycling), and in existing centres where possible.

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.

Proposals involving the redevelopment of existing community facilities for non-community uses will not be permitted, unless it can be clearly demonstrated that there is no longer a need to retain that facility.”

- 8.28 Policy CC9 (Securing Infrastructure) expects development to make appropriate provision for the following infrastructure, services, resources and amenities. The policy notes that such provision will be secured through planning obligations and/or the Community Infrastructure Levy as relevant.

Sustainability

- 8.29 Policy CC2 (Sustainable Design and Construction) states that proposals for new development will be acceptable where the design of buildings and site layouts use energy, water, minerals, materials and other natural resources in an appropriate and efficient manner. Major non-residential developments are expected to reach BREEAM 'excellent' standards, where possible.
- 8.30 Policy CC3 (Adaptation to climate change) requires all developments to demonstrate how they have been designed to incorporate measures to adapt to climate change.

Transport

- 8.31 Policy CC6 (Accessibility and the Intensity of Development) makes clear that scale and density of development should be related to its level of accessibility by walking, cycling and public transport to a range of services and facilities, with the densest and largest scale development taking place in the most accessible locations.
- 8.32 Policy TR1 (Achieving the Transport Strategy) states that *"proposed development should contribute appropriately to meeting the objectives of the most up-to-date Local Transport Plan or any successor document, including sub-strategies, specific projects identified and the local action plans."*

Planning permission will not be granted for major development proposals unless there is a commitment to implement measures to promote and improve sustainable transport facilities, such as through provision to encourage walking, cycling and the use of public transport; and through agreed travel plans, safe routes to local facilities and services, including schools and parks, and similar measures.

All development proposals should make appropriate provision for works and contributions to ensure an adequate level of accessibility and safety by all modes of transport from all parts of a development, particularly by public transport, walking and cycling, in accordance with any agreed transport assessment submitted as part of the application."

- 8.33 Policy TR3 (Access, Traffic and Highway-related matters) states that *"in determining proposals involving a new or altered access onto the transport network, improvement works to the transport network, the creation of new transport infrastructure or the generation of additional trips on the transport network, consideration will be given to the effect on safety, congestion and the environment."*
- 8.34 *Development will only be permitted where:-*

- i) Accesses and works to the highway comply with the adopted standards of the Transport Authority;*
- ii) The development would not have a material detrimental impact on the functioning of the transport network;*
- iii) The proposals would not be detrimental to the safety of users of the transport network, including pedestrians and cyclists;*
- iv) The proposal would not generate regular movement of heavy goods vehicles (HGVs) on unsuitable roads, or on roads without easy access to the Classified Highway Network; and*
- v) For non-residential uses, or new dwellings on classified roads, off-street servicing would be provided.*

Proposals involving either the construction of a new site access, or a material increase in the use of an existing site access, directly onto the Classified Highway Network will not be acceptable if they would be likely to result in the encouragement of the use of the network for short local trips or compromise the safe movement and free flow of traffic on the network or the safe use of the road.”

- 8.35 Policy TR5 (Car and Cycle Parking and Electric Vehicle Parking) notes that “*development should provide car parking and cycle parking that is appropriate to the accessibility of locations within the Borough to sustainable transport facilities, particularly public transport.*”

Development should make the following provision for electric vehicle charging points.

- *All new houses with dedicated off-street parking should provide charging points;*
- *Within communal car parks for residential or non-residential developments of at least 10 spaces, 10% of spaces should provide an active charging point.”*

Design & Amenity

- 8.36 Policy CC7 (Design and Public Realm) notes that all development must be of a high-quality design which maintains and enhances the character and appearance of the area within which they sit. Developments should also seek to create safe and accessible environments. Design and Access Statements will be required for all major development proposals.

- 8.37 Policy CC8 (Safeguarding Amenity) makes clear that development should “*not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties, in terms of:*

- *Privacy and overlooking;*
- *Access to sunlight and daylight;*
- *Visual dominance and overbearing effects of a development;*
- *Harm to outlook;*
- *Noise and disturbance;*
- *Artificial lighting;*
- *Vibration;*
- *Dust and fumes;*
- *Smell;*
- *Crime and safety*

...

As well as immediate impacts, other aspects to which this policy applies will include matters such as hours of operation of businesses, and effects of traffic movements, particularly of heavy goods vehicles (HGVs). Proposals which would generate regular movements of HGVs on residential roads will not be acceptable.

Where an otherwise acceptable development could change its character to a use that would have a greater impact on amenity without needing planning permission, conditions will be applied to restrict such changes.”

8.38 Policy EN17 (Noise Generating Equipment) outlines that “*where noise generating equipment is proposed, the noise source specific⁶¹ level (plant noise level) should be at least 10dBA below the existing background level as measured at the nearest noise sensitive receptor.*”

8.39 Policy EN15 (Air Quality) outlines that development should have regard to the need to improve air quality and reduce the effects of poor air quality:

i) “Development that would detrimentally affect air quality will not be permitted unless the effect is to be mitigated. The following criteria should be taken into account:

- *Whether the proposal, including when combined with the cumulative effect of other developments already permitted, would worsen air quality;*
- *Whether the development is within, or accessed via, an Air Quality Management Area; and*
- *Whether it can be demonstrated that a local worsening in air quality that would not detrimentally affect human health or the environment would be offset by an overall improvement in air quality, for instance through reduction in the need to travel.*

ii) Where a development would introduce sensitive uses (such as residential, schools and nurseries, hospitals, care facilities) into, or intensify such uses within, an Air Quality Management Area, detrimental effects on that use will be mitigated. Mitigation measures should be detailed in any planning application. If there are significant detrimental effects that cannot be mitigated, the application should be refused.

iii) Where required, planning obligations will be used to secure contributions to measures to tackle poor air quality or for air quality monitoring.”

Environment

8.40 Policy EN7 (Local Green Space and Public Open Space) states that Local Green Spaces (LGS) and Public Open Space (POS) will be protected from development including Westfield Road Recreation Ground.

8.41 Policy EN12 (Biodiversity and The Green Network) notes that:

“The identified Green Network, the key elements of which are shown on the Proposals Map, shall be maintained, protected, consolidated, extended and enhanced. Permission will not be granted for development that negatively affects the sites with identified interest or fragments the overall network. The Green Network comprises:

- *Sites with identified biodiversity interest - Local Wildlife Sites, Local Nature Reserves, Biodiversity Opportunity Areas, protected and priority species and their habitats, Priority and Biodiversity Action Plan habitats, and the River Thames and all its tributaries (including the River Kennet and the Kennet & Avon Canal); and*
- *Areas with potential for biodiversity value and which stitch the Green Network together – designated Local Green Space and open green spaces, and existing and potential Green Links.*

New development shall demonstrate how the location and type of green space, landscaping and water features provided within a scheme have been arranged such that they maintain or link into the existing Green Network and contribute to its consolidation. Such features should be designed to maximise the opportunities for enhancing this network. All new development should maximise opportunities to create new assets and links into areas where opportunities are as yet unidentified on the Proposals Map.

b) On all sites, development should not result in a net loss of biodiversity and geodiversity, and should provide a net gain for biodiversity wherever possible. Development should:

- *Protect and wherever possible enhance features of biodiversity interest on and adjacent to the application site, incorporating and integrating them into development proposals wherever practicable; and*
- *Provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable.*

In exceptional circumstances where the need for development clearly outweighs the need to protect the value of the site, and it is demonstrated that the impacts cannot be: 1) avoided; 2) mitigated or; 3) compensated for on-site; then new development will provide off-site compensation to ensure that there is “no net loss” of biodiversity. Provision of off-site compensation shall be calculated in accordance with nationally or locally recognised guidance and metrics. It should not replace existing alternative habitats, and should be provided prior to development.”

8.42 Policy EN13 (Major Landscape Features and Areas of Outstanding Natural Beauty) makes clear that “Planning permission will not be granted for any development that would detract from the character or appearance of a Major Landscape Feature. The following areas, as shown on the Proposals Map, are defined as Major Landscape Features:

- *The Thames Valley;*
- *The Kennet and Holy Brook Meadows;*
- *The West Reading wooded ridgeline;*
- *The East Reading wooded ridgeline; and*
- *The North Reading dry valleys and Chilterns Escarpment.”*

8.43 Policy EN14 (Trees, Hedges and Woodlands) states that “individual trees, groups of trees, hedges and woodlands will be protected from damage or removal where they are of importance, and Reading’s vegetation cover will be extended. The quality of waterside vegetation will be maintained or enhanced.

New development shall make provision for tree retention and planting within the application site, particularly on the street frontage, or off-site in appropriate situations, to improve the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change. Measures must be in place to ensure that these trees are adequately maintained.”

- 8.44 Policy EN16 (Pollution and Water Resources) notes that *“development will only be permitted where it would not be damaging to the environment and sensitive receptors through land, noise or light pollution; where it would result in no deterioration in, or ideally enhance, ground and surface water quality; and where adequate water resources, sewerage and wastewater treatment infrastructure will be in place to support the proposed development prior to occupation.*

Proposals for development that are sensitive to the effects of noise or light pollution will only be permitted in areas where they will not be subject to high levels of such pollution, unless adequate mitigation measures are provided to minimise the impact of such pollution.”

Flooding

- 8.45 Policy EN18 (Flooding and Sustainable Drainage Systems) notes that *“all major developments must incorporate sustainable drainage systems (SuDS) as appropriate and in line with the Government’s Technical Standards. Smaller schemes are encouraged to incorporate SuDS, where possible. Runoff rates should aim to reflect greenfield conditions and, in any case, must be no greater than the existing conditions of the site. Schemes should ensure that the movement of water through vertical infiltration as well as horizontal run-off does not worsen contamination effects. Wherever possible, SuDS provision should maximise ecological benefits, link into the existing Green Network, incorporate tree planting and landscaping and avoid damage to existing significant trees, including through changes to the site hydrology. All new developments in areas of flood risk should give priority to SuDS.*

Supplementary Planning Documents (SPDs)

- 8.46 Whilst not forming part of the statutory development plan, the following SPDs are considered of relevance:

Revised Sustainable Design and Construction SPD (2011)

- 8.47 This document aims to promote high standards of Sustainable Design and Construction and brings together relevant national guidance (paragraph 1.12). It provides practical advice on the forms of sustainable design and construction plus waste minimisation that will meet policy requirements (paragraph 1.13).
- 8.48 Table 3.2 sets out that for minor non-residential development, a minimum of BREEAM Level ‘Very Good’ is required. The SPD also notes the following requirements:
- Strategic flood risk assessments and surface water management plans should be used to consider how developments could be affected by rainfall and different flood pathways (paragraph 5.3).
 - New developments should seek to use water more efficiently (paragraph 5.4).
 - New development should be designed to adapt to more intense rainfall, the possibility of flooding, plus heatwaves and droughts (paragraph 5.6).
 - The incorporation of SUDs needs to be considered at the start of the process (paragraph 5.8).
 - Developments should incorporate more sustainable approaches to waste management, firstly reducing waste during construction and secondly minimising the generation of waste of the developments lifetime (paragraphs 6.1 to 6.3).

Revised Parking SPD (2011)

- 8.49 This document provides parking standards. The site is located within defined Zone 2 (Primary Core Area). Typically this area is well served by public transport and much of the area is considered to be within acceptable walking distance (400m) of both the main railway station and Reading West railway station. Walking and cycling within the area is encouraged by the provision of wide and safe footways and some dedicated or shared cycle ways.

8.50 The parking standards set out for Use Class D1 Primary Education are:

- Car parking – Maximum of 1 per 2 FTE staff and 1 drop off space per 100 pupils;
- Cycle parking – Minimum of 1 space per 5 FTE staff, 1 space per 15 pupils (years 1 to 3) and 1 space per 10 pupils (years 4 to 6);
- Disabled parking – (up to 200 spaces) 3 disabled spaces or 5% of total capacity (whichever is greater).

Planning Obligations under Section 106 SPD (April 2015)

8.51 The guidance states that *“development proposals will be assessed on a site-by-site basis with the individual circumstances of each site being taken into consideration”*(paragraph 1.2).

8.52 S106 contributions will generally be sought in cases where a need is established for specific site related infrastructure, to make the development acceptable in planning terms, or where a specific policy requirement needs to be met.

9 The case for Planning Permission

9.1 This section considers the key planning issues relating to the principle of the continued use of the site for The Heights Primary School for a further year, whilst construction works at the permanent site are completed.

9.2 The following issues are key to the application and are considered in turn below:

- a) Principle of the D1 use as a school;
- b) Grant of an additional temporary permission;
- c) The temporary structures and their impact;
- d) Flood risk;
- e) Landscape and nature considerations (including ecology, open space and trees);
- f) Transport implications;
- g) Air quality;
- h) Sustainability;
- i) Impact on residential amenity;
- j) Construction management; and,
- k) Planning obligations

9.3 The Planning Statement now considers each of these points in turn:

a) Principle of D1 use

9.4 The current use of the site is as a temporary primary school and from the 1940s onwards the site was used for a children's nursery, until 2009. The site has been used from September 2014 for The Heights Primary school. A 2014 certificate of lawful use application established the use of the site as D1 within the Use Classes Order 1987, as amended.

9.5 It is therefore considered that the principle of continued D1 use at the site is appropriate and accords with relevant policies of the development plan, specifically Policy OU1.

b) Grant of an additional temporary permission

9.6 National Planning Practice Guidance (NPPG) on the use of conditions clearly states that *"it will rarely be justifiable to grant a second temporary permission (except in cases where changing circumstances provide a clear rationale, such as temporary classrooms and other school facilities)"*.

9.7 This planning application seeks an extension in time of the use of the site for the Heights Primary School to bridge the time period between the current planning permission for the 'temporary' site expiring in August 2020 and the completion of the permanent school facilities, expected to be before August 2021.

9.8 It is considered that the rationale for the planning application is justified and that the continued use of the site for a temporary period until August 2021 meets the exception outlined within the NPPG. Indeed, given the changing circumstances regarding the grant of planning permission and delivery of the school's permanent accommodation, it is considered that the grant of an additional temporary permission would be acceptable under national planning guidelines.

c) The temporary structures and their impact on the site and its surroundings

- 9.9 On 25 July 2014 permission was granted for the demolition of the then existing nursery school's buildings and construction of a temporary single storey modular unit for two years until September 2016. A first-floor extension to the building was approved in March 2016, along with the continued use of the building for a school until 31 August 2018. A further two-storey modular unit was approved in September 2018, along with the continued use of existing buildings on the site until August 2020. An application for the fencing-off of an area of the Westfield Road Recreation Ground for the School was also approved in September 2018, with permission until August 2020.
- 9.10 At the time of planning application (ref 180552), the height and scale of the proposed development was considered appropriate with the scale of the site and the character of its surroundings. Given the nature of the site, set back from Gosbrook Road and surrounded by mature trees, the structures will not appear bulky or dominant on the site and will not be visible from outside the immediate vicinity of the former nursery school site.
- 9.11 It is considered that the proposed development will continue to be of an appropriate scale and massing in the context of the site and is in accordance with relevant policies of the development plan, including Policy CC7 of the Local Plan.
- 9.12 A further limited period of one year is therefore also considered acceptable, after which the site will be cleared, and the school relocated to its permanent site.

d) Flood Risk

- 9.13 Careful consideration has been given to the site's location predominantly within Flood Zone 3. A Flood Risk Assessment (FRA) was prepared and approved under the previous permission (ref 180552) at the site. Given that there is no additional floorspace proposed as part of this planning application, it is considered that the results of this FRA still remain valid for use as part of this planning application submission. A summary of the assessments findings and mitigation measures is provided below, for reference.
- 9.14 It should be noted that the northern tip of the site is situated within Flood Zone 2. Safe access and egress to the site is available along a public footpath which runs from the north of the site to Falkland Road and Cromwell Road. Both of these roads are located in Flood Zone 1 and are 100m from the site. This provides an evacuation route and a place of safe refuge in the event of an impending flood. A Flood Evacuation Plan has also been prepared and is submitted with this application detailing the action to be taken upon receipt of a flood warning.
- 9.15 The FRA concludes that the proposal meets the NPPF Sequential and Exception Tests and, provided that the proposed mitigation measures are adhered to, the development would be appropriate and would not increase flood risk elsewhere.
- 9.16 As noted, the flood circumstances have not altered since the previous application submitted at the site (reference 180552) and it is therefore considered there should be no flood risk objection to this planning application.
- 9.17 In compliance with Policy EN18, the proposed temporary development will not increase risk to life and property arising from flooding.

e) Landscape and nature considerations (including ecology, open space and trees)

- 9.18 The proposal does not propose any new operational development over and above that which is currently on site and which was previously approved in application reference 180552. Ecology and tree related issues were considered in the course of that application and previous application 151283. There are not considered to be any new ecological or tree related issues which require consideration. The modular units will be carefully removed from the site in order to avoid any adverse impact on existing trees.
- 9.19 The proposed development is therefore considered to be in accordance with relevant policies of the development plan, specifically policies EN13 and EN14 of the Local Plan.

f) Transport implications

- 9.20 A Transport Technical Note has been prepared by BWB in support of this application and follows the previous Transport Assessment undertaken by RPS as part of planning permission ref. 180552. A brief summary of its findings is provided below, but the full report should be referred to.
- 9.21 The Transport Technical Note confirms that after considering the small uplift in pupils and staff numbers, the mode share for academic year 2020/2021 is likely to remain as existing. The Note confirms that the parking arrangements used for the 2019/2020 academic year will continue to be used successfully as part of the 2020/2021 academic year and that there is adequate local bus services and provision of cycle parking on-site to cater for the expected modal share. The Note also confirms that the proposals will have no detrimental impact on the local highway network.
- 9.22 It is also noted that through the continued implementation of the School Travel Plan coordination strategy, including the active 'Working Group' involving school staff and parents, it is considered that the proposals would not have a detrimental impact on the operation of the local highway network during the 2020/2021 academic year.
- 9.23 The report concludes that the proposed development will have no detrimental impact on the local highway network and will provide adequate car and cycle parking in an appropriate location. It is therefore considered that the proposed development is in accordance with relevant development plan policy, specifically policies CC6, TR1, TR3 and TR5 of the Local Plan.

g) Air Quality

- 9.24 An Air Quality Assessment was submitted with the previous planning application (ref 180552) at the site, prepared by RPS. The current proposal does not introduce any new floorspace and the school use already exists on site. Therefore, it is not considered a fresh or updated Air Quality Report is required.
- 9.25 The Assessment, which was previously approved under permission 180552 makes clear that the overall impact of the proposed development on the surrounding area is considered to be 'negligible' and the resultant effects 'not significant'.
- 9.26 At the school itself, pollutant levels are predicted to be below the air quality thresholds. In light of all the above, there are no grounds to raise objection to the temporary proposals in air quality terms.
- 9.27 It is therefore considered that the proposed development is in accordance with relevant development plan policy, specifically Policy EN15 of the Local Plan.

h) Sustainability

- 9.28 The buildings are already in-situ. It is not proposed to install any new sustainability measures over and above those already on site.
- 9.29 The proposed temporary structures have been installed to be compliant with current building regulations. In addition, the buildings were prefabricated, thereby being more efficient with less construction time on site. Being temporary modular structures only required for a further academic year, it is not considered feasible nor viable to provide a BREEAM assessment in this instance.
- 9.30 As the Heights Primary School comprises two temporary use modular buildings it is not proposed to include renewable technologies such as solar photovoltaics and wind turbines installed. The financial and energy saving payback period on these technologies is between 7 – 15 years, therefore, these technologies are not viable for a temporary project.
- 9.31 Energy used within the temporary buildings is limited, however the buildings have adequate insulation and heating and lighting with suitable controls. The scheme does and will continue to incorporate a number of energy efficiency measures that will reduce energy consumption and CO2 emissions on the short life of the building. These include:
- Lighting - Motion sensors are fitted throughout to ensure lighting only comes on when the rooms are occupied; and
 - Windows - Windows are double glazed, sealed units comprised of 4mm clear float, 20 mm air gap, 4 mm low 'E' glass which achieves a 'U' value of 1.6 w/m2k.
- 9.32 The site is a brownfield site that is currently used for educational purposes. As the buildings are temporary modular units, the majority of the building materials have been either re-used or re-claimed from past or future schemes. For the materials that have been installed on site, these have been sourced locally to avoid unnecessary transport of goods over long distances.
- 9.33 It is therefore considered that the proposals are in accordance with the requirements of policies CC2 and CC3 given the temporary nature and pre-fabricated nature of the proposals.

i) Impact on Residential Amenity

- 9.34 No further works are proposed over and above that which currently exists on site. For the 2020/2021 academic year there will be a small increase in pupil numbers to 353 (an increase of 25 pupils) and in staff to 40FTE (an increase of 3FTE staff).
- 9.35 At the time of the previous 2018 planning application (ref 180552) the Committee report noted that *"there have been no concerns regarding the school from the occupants of the flats in Elizabeth House, which have until now been the nearest properties"*. The applicant is also unaware of any objections to Reading's Environmental Health team since this previous Committee Report.

- 9.36 An Acoustic Technical Note has been prepared by BWB, to review and build-upon, where necessary, the information provided within the Acoustic Report prepared by RPS as part of planning application 180552. A summary of the conclusions from the Note and Report are set out below; however, the full note and previous report should be referred to in full.

Acoustic Technical Note (BWB)

- 9.37 The Technical Note confirms that it is considered that the current noise levels on the site are unlikely to have changed significantly since the RPS Acoustic Report, published in 2018. Therefore, the results of the baseline noise survey are considered to be representative of the current noise climate on the site. The Note also confirms that in relation to building façade specifications and road traffic noise, there are considered to have been no significant changes in the baseline since the RPS Acoustic Report and therefore its conclusions still remain valid. The Technical Note concludes that after considering the small uplift in pupil and staff numbers, noise from the proposed development is unlikely to result in an adverse impact at nearby sensitive receptors.

Acoustic Report (RPS)

- 9.38 The Acoustic Report noted that previously recommended façade requirements for the existing school building were still considered appropriate.
- 9.39 An assessment was carried out to determine if the internal noise levels recommended in BB 93:2014 could be achieved at the proposed new modular block. Based on the measured noise levels, natural ventilation via partially open windows would be appropriate for teaching and learning spaces within this building.
- 9.40 Noise from road traffic has been considered in the assessment. The expected change in noise levels due to road traffic associated with the proposed development will be at a level sufficiently low that it will not cause a noise increase that would be perceptible at NSRs within the vicinity of the site.
- 9.41 On the basis of the above, the report considered that noise should not be a material concern with respect to the determination of planning permission for the proposed site.
- 9.42 It is therefore considered, in review of the Note and Report that there will be no detrimental impact on amenity arising from the temporary school accommodation proposed, in compliance with policies EN17 and CC8 of the Local Plan.
- 9.43 Conditions 20, 21 and 23 of permission 180552 restrict external plant on the site and hours of operation of the school. The school is willing to continue to comply with these restrictions.

j) Construction Management

- 9.44 The planning application proposes no additional floorspace above that which currently exists at the site and there is to be no additional construction works proposed at the site as a result of this planning application. It is therefore considered that a Construction Management Plan is not required for the proposed development.

k) Planning Obligations

- 9.45 The NPPF advises that planning authorities should consider the use of planning obligations where they could make an otherwise unacceptable development acceptable. They should only be used where it is not possible to address unacceptable impacts through planning conditions. Paragraph 56 (also Regulation 122(2) of CIL) states that planning obligations should only be sought where they meet all of the following tests:
- They are necessary to make a development acceptable in planning terms;
 - They are directly related to a development;
 - They are fairly and reasonably related in scale and kind to a development.
- 9.46 RBC adopted their Community Infrastructure Levy (CIL) Charging Schedule in January 2015. There is a nil charge for education (D1) floorspace.
- 9.47 The proposal seeks development, on a temporary basis, to enable the provision of primary (school) education. No negative transport, open space, sport, recreation or other is considered likely to arise as a consequence of the proposed scheme.

10 Conclusions

- 10.1 It is understood that a nursery or a school has operated on the site since the end of World War II (mid 1940s), other than a limited period between 2009 and 2014 and is an established Class D1 use, confirmed via a certificate of lawful use application in 2014. The Heights Primary School has operated from the site since 2014 successfully and in 2017 was rated 'Outstanding' by Ofsted. No new operational development is proposed additional to that which is currently on site.
- 10.2 The planning application needs to be considered against the backdrop of this established educational use with the school having been in place since 2014 when the first single storey element was installed. The second storey to the building was added in 2016 and permission was granted to allow its retention until August 2018. Two further applications for the building of an additional two storey modular unit and fenced area on Westfield Road Recreation Ground were permitted in September 2018, enabling educational use of the site for a further two years until August 2020.
- 10.3 This current application does not seek any further accommodation and the school will continue to operate as it does currently. There will be a small increase in the number of pupils (up to 353 pupils) and staff (up to 40FTE staff) for the academic year 2020/2021. This planning application is required to enable The Heights Primary School to continue to operate at its temporary site until 31st August 2021, at which point it is expected that the permanent site will be completed. The temporary structures on the site will not prejudice the future use of the site and at the end of the temporary period the site will be cleared, and accommodation removed.
- 10.4 The current proposals on the site were previously considered acceptable by both officers and Members, albeit until August 2020. The current proposals seek an extension of time of one year, allowing the school to continue to operate until 31st August 2021. Whilst it is noted that a new Local Plan for Reading Borough Council has been adopted since the previous permission in September 2018, the relevant planning policy position is considered substantially the same. The proposed development is considered to accord with relevant policies of the Local Plan (2019).
- 10.5 The site is located within Flood Zone 3. The development has been carefully designed, and mitigation measures will be employed, to ensure that it will not increase risk of flooding to the site and surrounding area. The Environment Agency made no objection to the previous planning application and it is considered the flood risk remains the same as at the time of this previous application (180552).
- 10.6 Highways related matters can be adequately addressed by way of management and supervision and the school's operation will continue as it does presently, with improvements wherever possible. Sufficient car, disabled, and cycle parking has been provided for the development given its temporary nature and it is considered that the proposed development will have no adverse impact on the local highway network.
- 10.7 The proposed temporary structures will continue to be compliant with current building regulations and there will be limited energy use during school hours. In addition, the proposed accommodation employs measures such as double glazing, motion sensors and energy efficient lighting. Given the structures are only temporary it is considered that the sustainability and energy efficiency measures proposed are sufficient.

- 10.8 There will be no increased negative impact on neighbouring amenity as a result of this proposal which proposes continued operation. It is considered the temporary development will not have a negative impact on air quality.
- 10.9 The school buildings for which permission is applied for are already in place. The proposal does not need to be supported by new, specific infrastructure and it does not have any detrimental impact, in its own right or cumulatively, on the Borough's existing social, physical, green or environmental infrastructure. Tree, landscape and ecological aspects alongside construction management impacts were considered at the time the units were installed and given no new operational development is proposed, there are considered to be no adverse impacts in respect of these issues. Should permission be granted, the units will simply remain in place until 31st August 2021.
- 10.10 The proposals are in accordance with the policies of the adopted Development Plan and there are no technical planning reasons as to why the application should not be permitted.



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