



Jones Lang LaSalle Incorporated

Planning Statement

Design & Access Statement

Statement of Community Involvement

Fenced-off area of Westfield Road Recreation Ground, 82 Gosbrook Road, Caversham, Reading, Berkshire
RG4 8BH

April 2020

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Executive Summary

This planning statement is submitted in support of a planning application for the retention of a fenced-off area on the Westfield Road Recreation Ground for educational use during school hours for use by the Heights Primary School until August 2021. This planning application is made by the Department for Education (DfE) on behalf of The Heights Primary School Trust.

The existing planning permission relating to the site requires the on-site fencing to be removed by 31st August 2020, under condition 2 of full planning permission granted in September 2018, reference 181035. Planning permission is sought until August 2021 in order to retain temporary playspace until such time as The Heights Primary School's permanent school is ready for occupation. The permanent school was approved by Reading Borough Council (RBC) under planning permission reference 171023 in August 2018.

The application site comprises 0.234 hectares of land used for public recreation and is located immediately to the west of the Heights Primary School temporary site. The site is located in the north of the Borough, and is bounded by Westfield Road to the west, Gosbrook Road to the south and residential housing to the north. Its wider area is primarily residential in character.

The proposed temporary fencing, which comprises 1.2m and 1.6m high metal railings, will have no adverse impact on local amenity. The Heights Primary School has successfully used the subject site for approximately one year at the time of writing. The use of the temporary fenced-off area by the school will remain as per condition 6 of planning permission 181035 for use during school hours of 1040-1530hrs Monday to Friday only.

To engage with the local community, a community consultant 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 proposals are as existing and ensure there will be no increase in flood risk to the site and surrounding area. Should permission be granted, the fenced-off area will remain in place until 31st August 2021.

The Planning Statement concludes that the retention of the existing fenced-off area on Westfield Road Recreation Ground 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') on behalf of The Heights Primary School Trust, to submit a full planning application to secure the continued use of a fenced-off area on the Westfield Road Recreation Ground for education use during school hours for the Heights Primary School. The School is located adjacent to the subject site at 82 Gosbrook Road, Caversham, Reading RG4 8BH.
- 1.2 The current planning permission requires the existing fencing to be removed from the site by August 2020 (reference 181035). This full planning application seeks permission for the retention of the fencing for up to one further year to August 2021. It is the intention that the school will relocate to its permanent accommodation and the fenced-off area reinstated as soon as practicable before this date.
- 1.3 This report provides an assessment of the proposed development against the provisions of the statutory Development Plan covering the site, national planning policy and other material considerations.
- 1.4 This planning application is submitted concurrently with another full planning application to extend the temporary period for the school buildings themselves and its associated development.

The Proposed Development

- 1.5 The proposed development seeks the retention of the existing fenced-off area on the Westfield Road Recreation Ground for education use during school hours for the neighbouring The Heights Primary School for an additional limited period of up to one year (until 31st August 2021) whilst the school's permanent accommodation is complete. It is the intention that the school will relocate to its permanent accommodation and the fenced-off area reinstated as soon as practicable before this date.
- 1.6 The use of the temporary fenced-off area by the school will remain as per condition 6 of planning permission 181035 for use during school hours of 1040-1530hrs Monday to Friday only.
- 1.7 The formal description of the development to Reading Borough Council (RBC) is:

"Retention of a fenced-off area of the Westfield Road Recreation Ground for educational use during school hours for use by the Heights Primary School."

Contents

- 1.8 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

1.9 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, including:
 - Site Location Plan (Drawing no. E03620 A PL 1060 A);
 - Existing site plan (Drawing no. E03620 A PL 1063); and
 - Proposed site plan (Drawing no. E03620 A PL 1062 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;
- Acoustic Report Addendum, by RPS;
- Noise Technical Note, by BWB;
- Transport Assessment, by RPS; and
- Transport Technical Note, by BWB
- 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 reception 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 (including nursery). 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 are 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 0.234 hectares of land and it is understood has been in use as a public recreation area since 1900. The site is located off the north side of Gosbrook Road and bounded to the west by the wider recreation area with Westfield Road beyond, to the east by the Heights Primary School temporary site and by the recreation area and residential housing to the north.
- 3.2 A macadam footpath bisects the recreation ground diagonally meeting a second footpath running north south adjacent to the boundary of the Heights Primary School temporary site. These paths connect with a main pedestrian route through Christchurch Meadows and over the new pedestrian bridge to the mainline railway station and town centre. Neither footpaths are designated public rights of way.
- 3.3 The recreation ground is currently in use by the general public for dog walking as well as general recreation space with a small children's play area. The recreation ground is not fenced along its southern or western boundaries and its northern boundary is bounded by semi-mature hedge. The eastern boundary of the recreation ground is divided from St Anne's CE Primary School by a brick wall and to the Heights Primary School temporary site by a leylandii hedge brick wall and fencing. There are no existing buildings on the site.
- 3.4 Two trees to the north of the site are covered by Tree Preservation Orders (TPOs).
- 3.5 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

- 3.6 The site's immediate surroundings comprise recreation, education, places of worship and residential accommodation.

4 Relevant Planning History

- 4.1 Table 4.1 below outlines the planning history of the site and the adjacent temporary site for the Heights Primary School, with which this planning application is linked.

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

Application Reference	Description of Development	Decision	Decision Date
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
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
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 for the proposed development, as submitted to RBC is:

“Retention of a fenced-off area of the Westfield Road Recreation Ground for educational use during school hours for use by the Heights Primary School.”

The Heights Primary School: Requirement for additional playspace

5.3 The Heights Primary is a 2 forms of entry primary school for children aged from 4-11 years. The school opened on a temporary site off Gosbrook Road, Caversham in September 2014.

5.4 By 2018 further temporary accommodation was required to allow the school to continue to admit reception children whilst waiting for its permanent site to be completed. Without the ability to continue to accept new pupils in reception the school's viability would be put at risk with siblings being prevented from attending the same school.

5.5 A subsequent planning application was submitted for the erection of an additional two-storey modular unit to ensure adequate capacity. This planning application also proposed the continued use of the temporary site until August 2020, whilst works to the School's permanent facilities were being constructed. The planning application was approved in September 2018 (reference 180552).

5.6 Prior to the previous application (reference 180552), the Heights Primary School had an arrangement with the neighbouring St Anne's Primary School to use part of their playing field for informal play at lunch times and break times. Following the increase in school capacity agreed in 2018, it was agreed that there would be undue pressure on playspace at St Anne's Primary School. Due to the restricted nature of the temporary site and the need to limit impact on the existing St Anne's Primary School, the Westfield Road Recreation Ground, located directly adjacent to the temporary school, was identified as being the optimum location for providing this extra space.

5.7 An area of Westfield Road Recreation Ground was agreed, and a subsequent planning application submitted, which would provide a dedicated, fenced-off area for the school to use during school operational hours (application reference 181035). Planning permission for the fenced-off area was approved in September 2018 for a period up to 31st August 2020. The proposed timescales of the temporary permission were made to align with the permission for the Heights Primary School temporary site (reference 180552).

5.8 Works to the Heights Primary School permanent facilities (reference 171023) are currently underway and due to be completed before August 2021. 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 relocation of the school to its permanent school facilities.

5.9 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.

Reinstatement of site

- 5.10 The contractor will complete the removal of all fencing and foundations on the site 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 2 weeks. The reinstatement works will be in line with condition 2 of the previous planning permission 181035.

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 6.1 below.

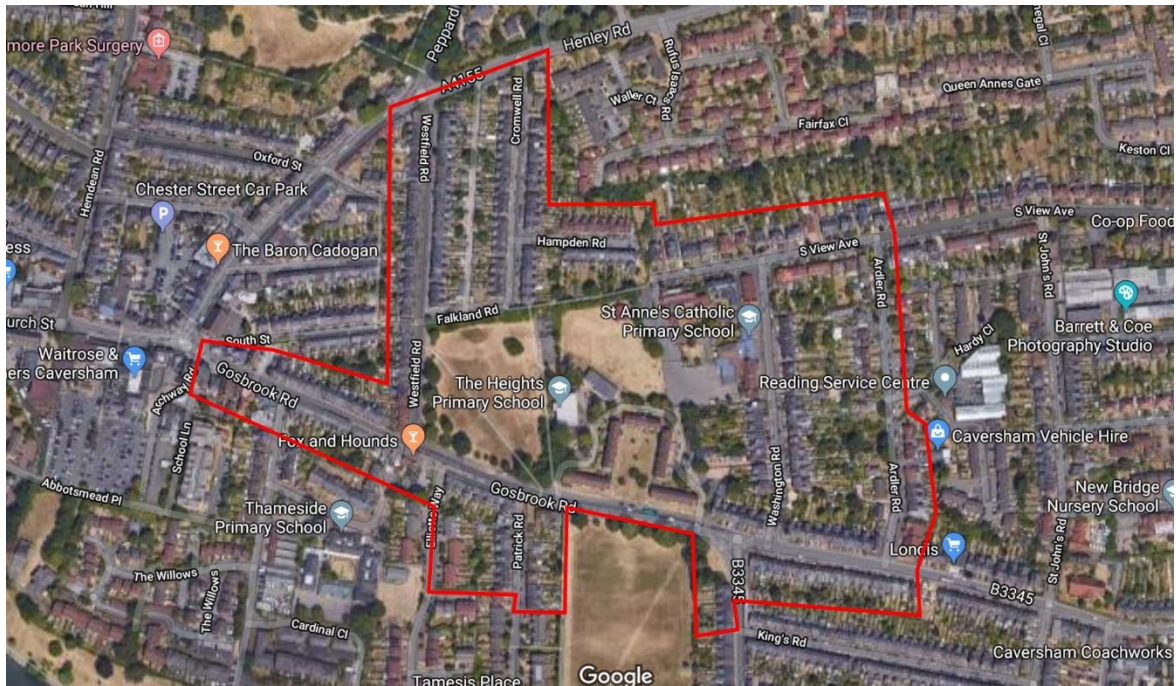


Figure 6.1. Consultation leaflet distribution area. Source Google Maps.

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.
- Local MP- 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





Figure 6.2. Consultation Leaflet.

6.5 A total of seven consultation responses were received and these are summarised in table 6.3 below:

Table 6.3. 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 6.3, 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. The alarm issue is an operational one and is understood to have been resolved. The footpath maintenance is the responsibility of other parties.

7 Design and Access Statement

Introduction

- 7.1 This Design and Access Statement has been prepared in support of a planning application for the retention of a fenced-off area on the Westfield Road Recreation Ground for educational use during school hours by the Heights Primary School until August 2021. There are no new works proposed as part of this current application so the current situation on site will, if the application is approved, simply remain in place for a maximum of one additional one year.

Use

- 7.2 The application relates to continued use of the existing fenced-off area on the Westfield Road Recreation Ground for educational use during school hours by the Heights Primary School until August 2021.
- 7.3 The use of the temporary fenced-off area by the school will remain as per condition 6 of planning permission 181035 for use during school hours of 1040-1530hrs Monday to Friday only.

Layout

- 7.4 The site comprises approximately 0.234 hectares of land and has been in use as a public recreation area since 1900. The site is located to the south-east corner of Westfield Road Recreation Ground.
- 7.5 The wider Westfield Road Recreation Ground is located off the north side of Gosbrook Road and bounded to the west by Westfield Road, to the east by the Heights Primary School temporary site and by residential housing to the north.
- 7.6 A macadam footpath bisects the recreation ground diagonally meeting a second footpath running north-south adjacent to the boundary of the Heights Primary School temporary site. These paths connect with a main pedestrian route through Christchurch Meadows and over the new pedestrian bridge to the mainline railway station and town centre.
- 7.7 The recreation ground is currently in use by the general public for dog walking as well as general recreation space with a small children's play area. The recreation ground is not fenced along its southern or western boundaries and its northern boundary is bounded by semi-mature hedge. The eastern boundary of the recreation ground is divided from St Anne's CE Primary School by a brick wall and to the Heights Primary School temporary site by a leylandii hedge brick wall and fencing. There are no existing buildings on the site.

Scale

- 7.8 There are no changes proposed to the existing temporary fencing at the site. The fencing, which comprises 1.2m and 1.6m high metal fencing, is not considered to be visually dominant nor have an adverse impact on the wider recreation ground or neighbouring residential amenity to the south and north of the recreation ground.

Landscaping and Boundary Treatment

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

Appearance

- 7.10 There are no changes proposed to the existing temporary fencing at the site.
- 7.11 The existing 1.2m high bow-top railings, which are finished green in colour will remain in place.
- 7.12 The short run of higher metal weldmesh fencing at 1.6m in height along the western boundary, adjacent to the shrubs, will also remain in place for reasons of safeguarding pupils due to restricted visibility. This is finished green in colour and matches the lower railings.

Access

- 7.13 Existing access arrangements to the site will remain. The fenced-off area is accessed via the north-south footpath which runs adjacent to the boundary of the Heights Primary School. Access to the footpath is taken from an existing gate (seen in yellow in figure 7.1 below) located along the western boundary of the Heights Primary School temporary site.



Figure 7.1: Temporary fencing used as part of the fenced-off area of Westfield Road Recreation Ground (foreground), with The Heights Primary School temporary accommodation (background).

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 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.
- 8.3 The adopted Development Plan for this site comprises:
- Reading Borough Local Plan (adopted November 2019).
- 8.4 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

- 8.5 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;
 - A Major Landscape Feature (policy EN13);
 - An area of identified Local Green Space and Public Open Space (policy EN7); and,
 - An existing/proposed Green Link (policy EN12).



Figure 8.1: RBC's Proposal Map extract. Source: RBC.

- 8.6 A review of the current Environment Agency (EA) flood mapping 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.
- 8.7 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)

- 8.8 The National Planning Policy Framework (NPPF) is a material consideration and sets national governmental planning policy, alongside associated planning practice guidance.
- 8.9 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 then 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

- 8.10 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

8.11 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

8.12 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.

8.13 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

8.14 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.”*

8.15 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.

8.16 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

- 8.17 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

- 8.18 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

- 8.19 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)

- 8.20 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.
- 8.21 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.
- 8.22 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.
- 8.23 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)

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

General Approach

- 8.25 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

- 8.26 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.”

Design & Amenity

- 8.27 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.
- 8.28 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.”

8.29 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

8.30 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.

8.31 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.”

8.32 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.”*

- 8.33 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.”

- 8.34 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

- 8.35 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)

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

Revised Sustainable Design and Construction SPD (2011)

- 8.37 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).
- 8.38 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).

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 land at Westfield Road Recreation Ground for use by The Heights Primary School during school hours 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) Grant of an additional temporary permission;
- b) The temporary structures and their impact;
- c) Flood risk;
- d) Landscape and nature considerations (including ecology, open space and trees);
- e) Air quality; and
- f) Impact on residential amenity.

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

a) Grant of an additional temporary permission

9.4 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)”*.

9.5 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 by August 2021.

9.6 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.

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

9.7 In September 2018 permission was granted for the fencing off of an area of the Westfield Road Recreation Ground for educational use during school hours for use by the Heights Primary School (reference 181035) for a period up to August 2020. The application proposed the retention of 1.2m and 1.6m high metal railings to enclose an area of the recreation ground together with a tarmac path linking the existing footpath with a new gated entrance to the temporary school site.

9.8 At the time of the previous planning application (ref 181035), the nature, height and scale of the proposed development was considered appropriate with the scale of the site and the character of its surroundings. The proposed fencing was considered to be visually unobtrusive, with limited impact on the wider recreation ground.

9.9 The use of the fenced-off area by the school during school hours was also considered acceptable and condition 6 of planning permission 181035 sought to ensure the use of the site during school hours of 1040-1530hrs Monday to Friday only. The continue use of the site by the school is proposed to continue in line with these existing permitted hours of use.

- 9.10 It is considered that the proposed development will continue to be of an appropriate scale in the context of the site and is in accordance with relevant policies of the development plan, including Policy CC7 of the Local Plan.
- 9.11 A further limited period of one year is therefore also considered acceptable, after which the site will be returned to its former use as land forming part of the recreation ground.

c) Flood Risk

- 9.12 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 181035) 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.
- 9.13 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.
- 9.14 As noted, the flood circumstances have not altered since the previous application submitted at the site (reference 181035) and it is therefore considered there should be no flood risk objection to this planning application.
- 9.15 In compliance with Policy EN18, the proposed temporary development will not increase risk to life and property arising from flooding.

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

- 9.16 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 181035. There are not considered to be any new ecological or tree related issues which require consideration. The fencing will be carefully removed from the site in order to avoid any adverse impact on the recreation ground.
- 9.17 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.

e) Air Quality

- 9.18 An Air Quality Assessment was submitted with the original planning application when the school was constructed, report dated June 2014 and an addendum, dated July 2015, was prepared for the application approved in 2016 given the additional storey of accommodation being provided at that time.
- 9.19 The site is located within an AQMA (Air quality Management Area). An Air Quality Assessment (AQA) (with addendum) has been undertaken by RPS. The report notes that the predicted changes in pollutant concentrations from the operation of the proposed development are categorised as 'imperceptible'. The overall impact on the surrounding area is considered to be 'negligible' and the resultant effects 'not significant'.
- 9.20 It should be noted that the committee report for the previous application at the site (reference 181035) noted that "the air quality assessment shows that users of the development site will be exposed to acceptable levels of air pollutants and there are therefore no objections on the grounds of poor air quality."

- 9.21 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.
- 9.22 It is therefore considered that the proposed developments is in accordance with relevant development plan policy, specifically Policy EN15 of the Local Plan.

f) Impact on Residential Amenity

- 9.23 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).
- 9.24 An Acoustic Technical Note has been prepared by BWB, to review and build-upon, where necessary, the information provided within the Acoustic and Acoustic Addendum Reports prepared by RPS as part of planning applications 180552 and 181035. A summary of the conclusions from the Note and Reports are set out below; however, the full note and previous reports should be referred to in full.

Acoustic Technical Note (BWB)

- 9.25 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 Reports, published in 2018. Therefore, the results of the baseline noise survey are considered to be representative of the current noise climate on the site and therefore the RPS Acoustic Report and its conclusions still remain valid. The Technical Note concludes that having considered the small uplift in pupil and staff numbers, noise from the proposed development is unlikely to result in an adverse impact at nearby noise sensitive receptors.

Acoustic and Acoustic Addendum Reports (RPS)

- 9.26 As part of the RPS Report, modelling was undertaken to predict the noise level from the annexed play area at the nearest noise sensitive receptors. The results of the assessment indicated that the relocation of the annexed play area and the additional pupils as a result of the previously consented extension may result in higher noise levels during break times, however it was considered unlikely that this would result in a significant impact due to the short time period the noise would occur. The Report also considered LAFmax levels associated with the annexed play area and concluded that the proposals were unlikely to change the existing noise climate, which included noise from children associated with the adjacent St. Anne's Catholic Primary School.
- 9.27 It is therefore considered, in review of the Note and Reports that there will be no detrimental impact on amenity arising from the proposals, in accordance with Policy CC8 of the Local Plan.

10 Conclusions

- 10.1 The use of land at Westfield Road Recreation Ground for the Heights Primary School was first granted permission in September 2018 by RBC (reference 181035). This was for a period of two years, up to August 2020, in line with permission 180552 for the continued operation of the school's temporary site until the same date.
- 10.2 This application proposes an extension in time for a maximum of a further year, until August 2021, for the use of the fenced off area. This extension in time is to enable The Heights Primary School to continue to operate from its temporary site whilst the permanent site is being constructed. The fencing on the site will not prejudice the future use of the site and as soon as it is no longer needed, the site will be returned to its original state as a recreation ground. The application is submitted concurrently with another application to extend the temporary period for the school buildings themselves and associated development.
- 10.3 The planning application needs to be considered against the backdrop of its previous permission (reference 181035) which established the principle for the use of the land for educational purposes in association with the Heights Primary School. Planning permission 181035 confirmed that the development would have no undue impact in relation to amenity, noise, ecology, trees or landscaping. 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).
- 10.4 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 (151283).
- 10.5 There will be no 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.
- 10.6 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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