

PLANNING STATEMENT

**HYBRID PLANNING APPLICATION: FULL
PLANNING APPLICATION (PHASE 1) FOR
CAR PARK EXTENSION WITH
RECONFIGURED INTERNAL VEHICULAR
CIRCULATION, LANDSCAPING, PLAY
EQUIPMENT, BOUNDARY TREATMENT
AND VARIOUS ASSOCIATED WORKS;
OUTLINE PLANNING APPLICATION
(PHASE 2) FOR UP TO 890SQM (GIA) OF
ADDITIONAL LEARNING AND NON-
RESIDENTIAL INSTITUTIONS USE (CLASS
F1), AN ADDITIONAL CAR PARK
EXTENSION, LANDSCAPING AND
VARIOUS ASSOCIATED WORKS, WITH ALL
MATTERS RESERVED EXCEPT ACCESS**

**WHITLEY PARK PRIMARY AND NURSERY
SCHOOL, BRIXHAM ROAD, READING,
RG2 7RB**

**ON BEHALF OF
READING BOROUGH COUNCIL**

SEPTEMBER 2026

Shrimplin
Planning & Development

www.shrimplin.co.uk

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1.0 INTRODUCTION

- 1.1 This Planning Statement has been produced by Shrimplin Planning & Development on behalf of Reading Borough Council in support of a hybrid planning application: Full planning application (Phase 1) for car park extension with reconfigured internal vehicular circulation, landscaping, play equipment, boundary treatment and various associated works; Outline planning application (Phase 2) for up to 890sqm (GIA) of additional Learning and non-residential institutions use (Class F1), an additional car park extension, landscaping and various associated works, with all matters reserved except access (hereafter referred to as the “Application Proposal”) at Whitley Park Primary and Nursery School, Brixham Road, Reading, RG2 7RB (hereafter referred to as the “Application Site”).
- 1.2 Whitley Park Primary school is a 3 form entry primary school for children aged between 4 and 11 years and an on-site nursery (30 pupils). It has been identified, along with The Ridgeway Primary School, to accommodate a new 168-place Special Educational Needs (SEN) school for children aged 3–16 with Learning Difficulties, Autism, ADHD, Speech, Language and Communication needs, and dysregulated behaviours, addressing a shortfall in SEN provision within the Borough. The new SEN school will provide a 96-place SEN secondary school while The Ridgeway Primary School will offer an 72-place SEN primary school.
- 1.3 The existing mainstream primary school is currently a 3FE school with a capacity of 630 pupils, although the current cohort is 518 pupils and so is operating with spare capacity. It is to be reduced to a 2FE school (420 pupils). The existing mainstream nursery accommodates 30 pupils (AM/PM). It is to be retained on site (accommodating 26 pupils – AM/PM), with enhanced nursery space and play areas. The Application Proposal will therefore result in a reduction in the number of pupils.
- 1.4 There are currently 93 staff (70 Full Time Equivalent (FTE)) accommodating the primary school, nursery and the existing satellite SEN school (Thames Valley School) which is expected to leave the site in July 2027 and will be replaced by the new SEN

primary school. The mainstream primary school is to be reduced to a 2FE school (420 pupils) with nursery capacity reduced to 26 pupils. It is expected that 75 staff (56 FTE) will be required to accommodate the primary and nursery. For Phase 1, the new SEN secondary school will accommodate 56 pupils (7 classes of 8 pupils). It is expected to be operated by 73 staff, including 7 teachers, 21 teaching assistants and support and administrative staff (total 58 FTE). For Phase 2, the secondary school will accommodate an additional 40 pupils (5 classes of 8 pupils) operated by approximately 45 additional staff, including 5 teachers, 15 teaching assistants and support and administrative staff (36 FTE).

- 1.5 The Application Proposal includes minor works to facilitate the changes to the existing nursery and primary school which is reducing in size to suit its reduced capacity, new/replacement hard surfacing, landscaping, canopies, new play space and equipment and low-level fencing that are expected to take place in late Summer 2026. There are also minor alterations to the school building (new / replacement windows and doors). These works do not require planning permission but are indicated on the plans for completeness. The existing Whitley Park Primary School will continue to be accessed from Brixham Road.
- 1.6 Recognising the differing levels and patterns of trips associated SEN pupils, the full planning application (Phase 1) works to facilitate the new SEN secondary school include a new internal vehicle circulation route with vehicles entering and leaving from the existing access on Brixham Road, enabling pupils to be transported directly to a new pick up and drop off area at the SEN school entrance. This will enable vehicles to queue on the site without backing up on to the public highway. A car park extension is proposed providing 40 spaces for the SEN school. Other works include play equipment, new / replacement hard surfacing and landscaping and fencing to provide a secure boundary between the schools. This application is a full planning application.
- 1.7 The outline planning application (Phase 2) works comprise works required to facilitate a future expansion of the new SEN secondary school. This includes an extension to the school to provide a two storey teaching block/hall and an additional car park

extension (25 spaces) and remedial changes to hard surfacing and landscaping. This application is an outline planning application with all matters reserved apart from access.

- 1.8 The next chapter of this Planning Statement explains the Application Proposal. Chapter 3 describes the Application Site and its wider context. Chapter 4 summarises the planning history of the Application Site. Chapter 5 sets out the relevant policy framework and the decision-making process. Chapter 6 provides an assessment of Application Proposal. A summary and conclusion are provided in Chapter 7.

2.0 APPLICATION PROPOSAL AND THE APPLICATION SUBMISSION

- 2.1 This chapter explains the Application Proposal and the information that will form the application submission.

The Application Proposal

- 2.2 The Application Proposal is a hybrid planning application: Full planning application (Phase 1) for car park extension with reconfigured internal vehicular circulation, landscaping, play equipment, boundary treatment and various associated works; Outline planning application (Phase 2) for up to 890sqm (GIA) of additional Learning and non-residential institutions use (Class F1), an additional car park extension, landscaping and various associated works, with all matters reserved except access.
- 2.3 The Application Proposal will facilitate the delivery of a new SEN primary school. Whitley Park Primary School will be reduced to a two-form-entry school (420 pupils) and the existing nursery will be retained with a capacity of 26 pupils. Both SEN and mainstream schools are educational establishments that fall within the same use¹. The subdivision of the site to provide two separate schools would not constitute a change of use and would not require planning permission. There will be some changes to the character of the use, particularly around trip patterns and parking, but these are not significant when compared to the site at full operational capacity, as explained in Chapter 6 below.
- 2.4 The Application Proposal includes minor works to facilitate the changes to the existing nursery and primary school which is reducing in size to suit its reduced capacity, new/replacement hard surfacing, landscaping, canopies, new play space and equipment and low-level fencing that are expected to take place in late Summer 2026. There are also minor alterations to the school building (new / replacement windows and doors). These works do not require planning permission but are indicated on the

¹ Class F1 of the Town and County Planning Act (Use Classes) Order 1987.

plans for completeness. The existing Whitley Park Primary School will continue to be accessed from Brixham Road.

- 2.5 Recognising the differing levels and patterns of trips associated SEN pupils, the full planning application (Phase 1) works to facilitate the new SEN secondary school include a new internal vehicle circulation route with vehicles entering and leaving from the existing access on Brixham Road, enabling pupils to be transported directly to a new pick up and drop off area at the SEN school entrance. This will enable vehicles to queue on the site without backing up on to the public highway. A car park extension is proposed providing 40 spaces for the SEN school. Other works include play equipment, new / replacement surfacing and landscaping and fencing to provide a secure boundary between the schools. This application is a full planning application.
- 2.6 The outline planning application (Phase 2) works comprise works required to facilitate a future expansion of the new SEN secondary school. This includes an extension to the school to provide a two storey teaching block/hall and an additional car park extension (25 spaces) and remedial changes to surfacing and landscaping. The maximum floorspace anticipated is 890 sqm. This application is an outline planning application with all matters reserved apart from access.
- 2.7 Re-located / new cycle storage is included providing secure, convenient and covered cycle storage for the existing and new school.
- 2.8 New refuse storage is provided for Whitley Park Primary School with the existing storage re-purposed for the new SEN school.

The application submission

- 2.9 This application submission comprises the following information. The drawings have been separated between the full planning application and outline planning application but all of the remaining submission documents apply to both applications:
- Application Form and Certificates;
 - CIL form;

- Planning Statement (Shrimplin Planning & Development) (September 2026);
- Design and Access Statement revision P4 (ACG) (September 2026);
- Full planning application drawings:
 - Topographical Survey (Sumo Services Ltd) (May 2025);
 - Existing architectural drawings (ACG) (August 2026):
 - Location Plan, drawing number WTL-ACG-XX-00-DR-A-0090 revision P3;
 - Existing Site Block Plan, drawing number WTL-ACG-XX-00-DR-A-0091 revision P3;
 - Existing Ground Floor Plan, drawing number WTL-ACG-XX-00-DR-A-1090 revision P4;
 - Proposed architectural drawings: (ACG) (August 2026):
 - Proposed Phasing Site Plan, drawing number WTL-ACG-XX-00-DR-A-0290 revision P4;
 - Proposed Site Block Plan Phase 1, drawing number WTL-ACG-XX-00-DR-A-0291 revision P3;
 - Proposed Ground Floor Plan Phase 1, drawing number WTL-ACG-ZZ-00-DR-A-2090 revision P4;
 - Existing landscape drawings (Terraforma) (August 2026):
 - Existing site plan, drawing number WTL-TFC-XX-XX-DR-L-1000 revision P02;
 - Proposed landscape drawings (Terraforma) (August 2026):
 - General Arrangement – Site wide, drawing number WTL-TFC-XX-XX-DR-L-1030 revision P06;
 - General Arrangement – Site wide, drawing number WTL-TFC-XX-XX-DR-L-1034 revision P03;
 - General arrangement – NW, drawing number WTL-TFC-XX-XX-DR-L-1031 revision P06;
 - General arrangement – NE, drawing number WTL-TFC-XX-XX-DR-L-1032 revision P04;

- General arrangement – S, drawing number WTL-TFC- XX-XX-DR-L-1033 revision P02;
- Whitley Park- Proposed BB103 calculations Phase 1, drawing number WTL-TFC-XX-XX-DR-L-1101 revision P03;
- Whitley Park- Proposed BB103 calculations Phase 2, drawing number WTL-TFC-XX-XX-DR-L-1103 revision P01;
- Outline planning application drawings:
 - Existing architectural drawings (ACG) (August 2026):
 - Location Plan, drawing number WTL-ACG-XX-00-DR-A-0090 revision P2;
 - Existing Site Block Plan, drawing number WTL-ACG-XX-00-DR-A-0091 revision P2;
 - Existing Ground Floor Plan, drawing number WTL-ACG-XX-00-DR-A-1090 revision P4;
 - Proposed architectural drawings: (ACG) (August 2026):
 - Proposed Phasing Site Plan, drawing number WTL-ACG-XX-00-DR-A-0290 revision P4;
 - Proposed Site Block Plan Phase 2, drawing number WTL-ACG-XX-00-DR-A-0292 revision P4;
 - Proposed Ground Floor Plan Phase 2, drawing number WTL-ACG-ZZ-00-DR-A-2091 revision P4;
 - Proposed New Build Extension Phase 2 - Parameter Elevations, drawing number WTL-ACG-ZZ-00-DR-A-4091 – revision p1
 - Existing landscape drawings (Terraforma) (August 2026):
 - Existing site plan, drawing number WTL-TFC-XX-XX-DR-L-1000 revision P02;
 - Proposed landscape drawings (Terraforma) (August 2026):
 - General Arrangement – Site wide (Phase 2), drawing number WTL-TFC-XX-XX-DR-L-1040 revision P05;
 - General Arrangement – Site wide (Phase 2), drawing number WTL-TFC-XX-XX-DR-L-1042 revision P02;

- General arrangement Phase 2 works, drawing number WTL-TFC-XX-XX-DR-L-1041 revision P04;
 - Fencing Details, drawing number WTL-TFC-XX-XX-DR-L-4002 – revision P01
- Transport Statement (SWH) (September 2026);
- Sustainability Statement (RCDC) (September 2026);
- Environmental Impact Noise Assessment (Sound Advice Acoustics) (August 2026);
- Internal Noise Assessment (Sound Advice Acoustics) (August 2026);
- Flood Risk Assessment & Drainage Strategy (Marbas) (September 2026);
- Tree Constraints Plan (SJ Stephens Associates) (August 2025);
- Tree Survey (SJ Stephens Associates) (August 2025);
- Preliminary Ecological Appraisal (John Wenman Ecological Consultancy) (August 2026);
- Biodiversity Net Gain (John Wenman Ecological Consultancy) (September 2026);
- Whitley Park Primary School Outline Landscape Specification - Enabling Works (Terraforma) (May 2026);
- Whitley Park Primary School Outline Landscape Specification (Terraforma) (May 2026).

3.0 APPLICATION SITE AND ITS WIDER CONTEXT

3.1 This chapter describes the Application Site and its wider context.

Application Site

3.2 Whitley Park Primary School was originally constructed in the 1950s and expanded in 2011. It comprises a single storey U-shaped building, playground, playing fields and parking areas. It is accessed from Brixham Road with pedestrian accesses from Basingstoke Road and Callington Road. In addition to the main primary school, there is an on-site nursery for children aged 3 to 5 years.

3.3 There are numerous trees dispersed across the site.

3.4 The Application Site does not fall within a Conservation Area. It is within Fluvial Flood Zone 1 (low probability). It partly lies within an Air Quality Management Area (AQMA) that extends along Basingstoke Road.

Application Site's context

3.5 The Application Site lies within a predominantly residential area south of Reading town centre. Residential properties adjoin the site to the north (Meavy Gardens), south (Callington Road), east (Brixham Road) and west (Basingstoke Road). There is also a public house and hotel to the south west.

4.0 PLANNING HISTORY

- 4.1 The Application Site has an extensive planning history associated with its educational use which is not relevant to the Application Proposal.

5.0 POLICY FRAMEWORK AND DECISION-MAKING PROCESS

- 5.1 This chapter sets out the relevant policy framework and the decision-making process.

Development plan

- 5.2 The development plan comprises the adopted Reading Borough Local Plan (November 2019) and the Proposals Map (November 2019).

Material considerations

- 5.3 Reading Borough Council is in the process of updating its Local Plan. It has recently submitted the Local Plan Submission Draft Partial Update to the Secretary of State for examination. An Inspector has been appointed and public hearing sessions are expected later this year. As the Local Plan update is at an advanced stage, it can be given some weight in decision making.
- 5.4 Reading Borough Council is in the process of updating its Local Plan. The Local Plan Partial Update was submitted to the Secretary of State for examination in May 2025. An Inspector has been appointed and public hearing sessions took place in November and February 2026. As the Local Plan update is at an advanced stage, it can be given some weight in decision making.
- 5.5 The NPPF (August 2026), with additional guidance provided in the NPPG (March 2014), is an important material planning consideration.

Decision-making process

- 5.6 Section 70(2) of the Town & Country Planning Act 1990 requires that in dealing with an application for planning permission:

“the authority shall have regard to the provisions of the development plan, so far as material to the application.”

- 5.7 Section 38(6) of the Planning and Compensation Act 2004 states that:

“if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise”

- 5.8 As explained above, the NPPF is a relevant material consideration in the determination of the Application Proposal. These statutory provisions are reflected in the NPPF, where Policy S3: Presumption in favour of sustainable development states that decisions should apply a presumption in favour of sustainable development which means:

“c. In all locations, development proposals that accord with both an up-to-date development plan and the decision-making policies in this Framework should be approved without delay.”

- 5.9 Policy S3 also says that the presumption in favour of sustainable development means that Policy S4 : Principle of development within settlements should be applied. Policy S4 says:

“1. Development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework.”

- 5.10 Policy S4 lists a number of where circumstances in which the benefits of approving development are likely to be substantially outweighed by adverse effects. None of these apply to the Application Proposal.

- 5.11 This Statement will demonstrate that the Application Proposal is in accordance with the development plan as well as NPPF Policy S3: Presumption in favour of sustainable development and Policy S4 : Principle of development within settlements.

- 5.12 Although the Local Plan is more than five years old, the Council’s Partial Review of the Local Plan (2023) has found that the policies most important for determining the

application, namely Policy OU1: New and existing community facilities and Policy TR3: Access, traffic and highway-related matters, are consistent with the National Planning Policy Framework. However, a review has not yet been undertaken against the recently updated NPPF and so it cannot attract full weight in decision-taking at this stage. Nevertheless, this Statement will demonstrate that the Application Proposal is in accordance with the development plan.

- 5.13 In considering applications it is important to bear in mind NPPF DM3: Determining development proposals which begins by saying that when considering development proposals, local planning authorities should:

“a. Work with the applicant in a positive and proactive manner, where necessary seeking solutions to problems arising from initial proposals, to enable a timely decision;...”

- 5.14 This is reflected in Local Plan Policy CC1: The presumption in favour of sustainable development which provides the underlying principles that guide the approach to decision making:

“A positive approach to considering development proposals will be taken that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). Where appropriate, the Council will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible.”

- 5.15 The next chapter assesses the Application Proposal within this policy framework and decision-making process.

6.0 ASSESSMENT OF THE APPLICATION PROPOSAL

- 6.1 This chapter assesses the Application Proposal in terms of intensification of important facilities such as schools; parking and highways impact; residential amenity; ecology; and trees.

Intensification of important facilities

Policy framework

- 6.2 NPPF Policy HC1: Planning for healthy communities regarding plan making recognises the “considerable” importance of providing educational facilities to meet the “needs of the local population”:

“Authorities should attach considerable importance to providing for sufficient education facilities (including early years, school and post-16 provision)...”

- 6.3 NPPF Policy HC4: Proposals for new and improved community facilities, public service infrastructure and development providing public health benefits recognises that “substantial weight” should be given to “public service infrastructure” developments:

“New or improved public service infrastructure or community facilities would be provided;”

- 6.4 NPPF Policy HC7: Development affecting existing recreational land and facilities sets out the approach to dealing with proposals that affect open space and land used for sport.

“1. Development proposals should not result in the loss of existing open space, sports and recreational buildings and land, including playing fields, other formal and informal play space and allotments, unless:

- a. An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or

- b. The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality, in a location which offers comparable or improved accessibility for the community it serves; or
- c. The development is for public service infrastructure, and the resulting loss would be replaced by equivalent or better provision in terms of quantity and/or quality; or
- d. The development is for alternative open space, sports and recreational buildings and land, the benefits of which clearly outweigh the loss of the current or former use.”

- 6.5 Reading Local Plan Policy OU1: New and existing community facilities recognises that the intensification important facilities such as schools is often necessary and will be supported:

“Proposals for on-site intensification of important facilities, such as schools and healthcare uses, will be supported, subject to other policies in the plan”

- 6.6 The Policy also accepts that this may result in the loss of some “open areas”:

“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.”

- 6.7 There are separate requirements for “the loss of sports pitches” and “playing fields”. As explained above, the Application Site is an area of overspill space and so this is not relevant to the Application Proposal. Without prejudice, we address the requirements of the policy which says that these areas 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.”

Assessment

- 6.8 The Application Proposal provides new and improved facilities for the existing school and to facilitate a new SEN school, meeting local educational needs. This is a matter of “considerable” importance, as referenced in NPPF Policy HC1: Planning for healthy communities.
- 6.9 The car park extension is required to facilitate a new SEN school. The car park extension in the full planning application (Phase 1), and the additional car park extension in the outline planning application (Phase 2), is located on is an area of overspill space adjacent to the car park. It will therefore not result in the loss of a sports pitch or playing field.
- 6.10 Without prejudice to this, as explained above, it is an awkwardly shaped overspill space that is incapable of forming part of a playing pitch and its loss will not reduce the size of any playing pitch, result in the inability to use any playing pitch or reduce the site’s sporting capacity. The existing primary school, which is being reduced to 2FE, continues to be provided with adequate levels of outdoor space, in accordance with BB103 standards². It therefore has “no specific use” in accordance with Local Plan Policy OU1(b) and is “surplus to requirements” in accordance with NPPF Policy HC7 (1)(a). Also, as explained above, the Application Proposal will provide significant enhancements to play and recreation facilities for the existing school and new SEN

² Whitley Park- Proposed BB103 calculations Phase 1, drawing number WTL-TFC-XX-XX-DR-L-1101 revision P03;
Whitley Park- Proposed BB103 calculations Phase 2, drawing number WTL-TFC-XX-XX-DR-L-1103 revision P01;

school and so will realise “better provision in terms of quantity and/or quality” in accordance with NPPF Policy HC7 (1)(c).

- 6.11 The new parking forms a logical extension to the existing car park and cannot be located elsewhere due to the site constraints and as the only vehicular access to the site is from Brixham Road.
- 6.12 The Application Proposal provides new and improved facilities for the existing school and to facilitate a new SEN school, meeting local educational needs. This is a matter of “considerable” importance and should be given “substantial weight” in accordance with NPPF Policies HC1 and HC4 and Local Plan Policy OU1: New and existing community facilities. This also fulfils the “social objective” of sustainable development in facilitating the provision of a new SEN school and meeting the Borough’s educational needs.

Residential amenity

Policy Framework

- 6.13 Local Plan Policy CC8: Safeguarding amenity seeks to ensure that new development does not have a “detrimental impact” on the amenity of neighbours:

“Development will 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”.

Assessment

- 6.14 The Application Site has an established educational use. The Application Proposal will result in a reduction in the number of pupils.
- 6.15 An Internal Noise Assessment and Environmental Impact Noise have been submitted as part of the planning application which demonstrates that the Application Proposal is in accordance with Policy CC8: Safeguarding amenity.
- 6.16 The introduction of a SEN school and the associated reconfigured internal vehicular circulation will change the number and pattern of trips to the Application Site. However, as explained in the Transport Statement, there will only be a small increase in two-way vehicle trips when taking into account the current capacity of the site and the reduced intake of the existing primary school. The new internal vehicle circulation and drop off/pick up arrangements will accommodate vehicles associated with the new SEN school on-site, avoiding issues being displaced onto the public highway.
- 6.17 The Application Proposal is therefore in accordance with Policy CC8: Safeguarding amenity.

Highways impact

Policy Framework

- 6.18 Local Plan Policy TR1: Achieving the transport strategy is an overarching policy that aims to ensure that new development achieves the objectives of the Local Transport Plan (2011-2026):

“Proposed development should contribute appropriately to meeting the objectives of the most up-to-date Local Transport Plan...

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.”

- 6.19 Local Plan Policy TR3: Access, traffic and highway-related matters aims to manage the impact of new development on the transport network:

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”.

Assessment

- 6.20 A Transport Statement has been submitted which demonstrates that the development can be accommodated safely on the highway network. This considers the trip

generation associated with the new SEN school taking into account that of the existing primary school and nursery, concluding that there is only a minor increase in vehicular trips to the site. It also highlights that Reading Borough Council Children's Services are currently conducting a wider study on school transport to collate the cost and overall impact of SEND children being sent to private provision, sometimes outside the borough, having an adverse impact on individual pupils with special needs having to commute, and the added carbon impact of private taxis being used for this transport. Providing SEN provision within Reading reduces taxi trips outside of the borough during peak hours on key Reading roads and the impact on vulnerable children which, in the context of increased staffing numbers, must be seen as an overall improvement.

- 6.21 The Application Proposal is in accordance with Policy TR3: Access, traffic and highway-related matters.

Energy

Policy framework

- 6.22 Local Plan Policy CC2: Sustainable design and construction sets out energy and sustainability requirements for new development. The policy requires "major non-residential developments" to achieve "BREEAM Excellent" and "minor non-residential developments" to achieve "BREEAM Very Good". These requirements do not apply to Phase 1 as there is no new build development. The requirements do not apply to Phase 2 as the maximum anticipated floorspace is 890 sqm. The Sustainable Design and Construction SPD includes a further requirement for "Non-residential refurbishment" to achieve "BREEAM Very Good" (Table 3.1). The supporting text advises that this may apply to "changes of use" and that "the appropriate approach with regards to sustainability will be considered on a case by case basis.". As explained above, the Application Proposal does not result in a change of use and the refurbishment of the building is not in itself development. The requirements of Policy CC2 and the Sustainable Design and Construction SPD do not apply to Phase 1.

6.23 Local Plan Policy CC3: Adaptation to Climate Change sets out how development should incorporate measures to “adapt to climate change”:

- Wherever possible, new buildings shall be orientated to maximise the opportunities for both natural heating and ventilation and reducing exposure to wind and other elements;
- Proposals involving both new and existing buildings shall demonstrate how they have been designed to maximise resistance and resilience to climate change for example by including measures such as solar shading, thermal mass, heating and ventilation of the building and appropriately coloured materials in areas exposed to direct sunlight, green and brown roofs, green walls, etc;
- Use of trees and other planting, where appropriate as part of a landscape scheme, to provide shading of amenity areas, buildings and streets and to help to connect habitat, designed with native plants that are carefully selected, managed and adaptable to meet the predicted changed climatic conditions; and
- All development shall minimise the impact of surface water runoff from the development in the design of the drainage system, and where possible incorporate mitigation and resilience measures for any increases in river flooding levels as a result of climate change”

Assessment

6.24 As explained above, the requirements of Policy CC2 and the Sustainable Design and Construction SPD do not apply to the full planning application (Phase 1) or the outline planning application (phase 2). Without prejudice, we have provided a Sustainability Statement that demonstrates how sustainability and adaptation to climate change is at the heart of the project, recognising that the detailed design of the building is not known.

6.25 The Application Proposal is in accordance with Local Plan Policy CC2: Sustainable design and construction and CC3: Adaptation to Climate Change.

Ecology

Policy framework

6.26 Local Plan Policy EN10: Biodiversity and the green network sets out the Council's approach to protecting "biodiversity":

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..."

Assessment

6.27 A Preliminary Ecological Appraisal has been submitted as part of the planning application. The Preliminary Ecological Appraisal did not find any constraints to development. The Biodiversity Net Gain Report shows that the Application Proposal results in a deficit of 0.71 Habitat Units and no loss of Hedgerow units. The mandatory requirement of 10% net gain will be achieved through the use of land within the wider ownership / site or off-site habit units.

6.28 The Application Proposal is therefore in accordance with Local Plan Policy EN10: Biodiversity and the green network and Local Plan Policy EN12.

Trees

Policy framework

6.29 Local Plan Policy EN4: Trees, hedges and woodlands seeks to protect trees, hedges and woodlands:

“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...”

Assessment

- 6.30 An Tree Survey and Tree Constraints Plan have been prepared. An Arboricultural Impact Assessment and Method Statement will be submitted demonstrating how trees on and surrounding the site will be protected during the development. The Application Proposal is therefore in accordance with Local Plan Policy EN4: Trees, hedges and woodlands.

7.0 SUMMARY AND CONCLUSION

- 7.1 This Planning Statement has been produced by Shrimplin Planning & Development on behalf of Reading Borough Council in support of a hybrid planning application: Full planning application (Phase 1) for car park extension with reconfigured internal vehicular circulation, landscaping, play equipment, boundary treatment and various associated works; Outline planning application (Phase 2) for up to 890sqm (GIA) of additional Learning and non-residential institutions use (Class F1), an additional car park extension, landscaping and various associated works, with all matters reserved except access at Whitley Park Primary and Nursery School, Brixham Road, Reading, RG2 7RB.
- 7.2 Chapter 2 explained the Application Proposal and the information that forms the application submission. Chapter 3 described the Application Site and its wider context. Chapter 4 summarised the planning history of the site.
- 7.3 Chapter 5 set out the relevant policy framework and the decision-making process. Chapter 6 provided an assessment of the Application Proposal.
- 7.4 The Application Proposal provides new and improved facilities for the existing school and to facilitate a new SEN school, meeting local educational needs. This is a matter of “considerable” importance and should be given “substantial weight” in accordance with NPPF Policies HC1 and HC4 and Local Plan Policy OU1: New and existing community facilities. This also fulfils the “social objective” of sustainable development.
- 7.5 The car park extension is required to facilitate a new SEN school. The car park extension for the full planning application (Phase 1), and the additional car park extension for the outline planning application (Phase 2), is located on is an area of overspill space adjacent to the car park. It will therefore not result in the loss of a sports pitch or playing field.

- 7.6 Without prejudice to this, as explained above, it is an awkwardly shaped overspill space that is incapable of forming part of a playing pitch and its loss will not reduce the size of any playing pitch, result in the inability to use any playing pitch or reduce the site's sporting capacity. The existing primary school, which is being reduced to 2FE, continues to be provided with adequate levels of outdoor space, in accordance with BB103 standards³. It therefore has "no specific use" in accordance with Local Plan Policy OU1(b) and is "surplus to requirements" in accordance with NPPF Policy HC7 (1)(a). Also, as explained above, the Application Proposal will provide significant enhancements to play and recreation facilities for the existing school and new SEN school and so will realise "better provision in terms of quantity and/or quality" in accordance with NPPF Policy HC7 (1)(c).
- 7.7 The new parking area forms an extension to an existing car park and is located a significant distance (20m) from the nearest residential neighbours on the opposite side of Brixham Road. As explained in the Transport Statement, the overall number of trips to the site is not expected to increase significantly as the existing primary school is being reduced to a 2 form entry intake. It will therefore not give rise to a material increase in noise and disturbance. The Application Proposal is in accordance with Policy CC8: Safeguarding amenity.
- 7.8 The Application Proposal will result in a reduction in the number of pupils at the Application Site. The introduction of a SEN school and the associated reconfigured internal vehicular circulation will change the number and pattern of trips to the Application Site. However, as explained in the Transport Statement, there will only be a small increase in two-way vehicle trips when taking into account the current capacity of the site and the reduced intake of the existing primary school. The new internal vehicle circulation and drop off/pick up arrangements will accommodate vehicles

³ Whitley Park- Proposed BB103 calculations Phase 1, drawing number WTL-TFC-XX-XX-DR-L-1101 revision P03;
Whitley Park- Proposed BB103 calculations Phase 2, drawing number WTL-TFC-XX-XX-DR-L-1103 revision P01;

associated with the new SEN school on-site, avoiding issues being displaced onto the public highway. A Internal Noise Assessment and Environmental Impact Noise have been submitted as part of the planning application which demonstrates that the application proposal is in accordance with Policy CC8: Safeguarding amenity.

- 7.9 The Application Proposal is acceptable in terms of highways impact, ecology and trees.
- 7.10 We respectfully request that planning permission is granted.