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Sevenoaks District Local Plan

Consultation Draft July 2018

Iceni Projects Limited on behalf of
Parkwood Hall Co-operative
Academy Trust

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ON BEHALF OF PARKWOOD
HALL CO-OPERATIVE
ACADEMY TRUST

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APPENDICES

A1. SITE LOCATION PLAN

1. INTRODUCTION

- 1.1 We hereby provide our comments on the Sevenoaks District Draft Local Plan as published for consultation on 16th July 2018, on behalf of our client, Parkwood Hall Co-operative Academy Trust ('Parkwood Hall', or 'The School').
- 1.2 The trust operates the existing educational establishment at Parkwood Hall School, Beechenlea Lane to the east of Swanley ('the site'). The school provides an inclusive education facility for pupils aged 7 to 19 with special educational needs. We enclose at Appendix 1 a plan identifying the site, which extends to approximately 30 hectares in total, including a number of buildings of varying ages and conditions, as well as extensive grounds that are used for outdoor 'field study' and which create a calm environment for those students with autism.
- 1.3 On behalf of our client, Icenii have reviewed the 'Draft Sevenoaks District Local Plan Consultation Version' (July 2018) having regard to the school's current operations and future aspirations for the use of the site. It should be noted that our client is not seeking significant alterations to the draft Plan, rather respectfully requesting an acknowledgement in future planning policy that the school's aspirations can be achieved. These include an ambition to modernise existing buildings to enhance the quality of the facilities provided on the site, through measures such as internal refurbishment, the installation of better disabled access, and potential limited extensions or replacement buildings to ensure the complex needs of pupils are fully met.
- 1.4 We acknowledge that the site currently falls outside of the built limits of Swanley as defined in adopted planning policy and that the site is located within the Green Belt, with national and local policy placing restrictions on the extent of development which could take place at the site.
- 1.5 Having reviewed the current consultation document, we provide comments below on a number of relevant policies included in the latest draft of the Local Plan. We will be pleased to discuss these representations in further detail with the Council in due course.

2. BACKGROUND

- 2.1 Parkwood Hall is an inclusive day and residential school catering for 7-19 year-old students with a wide range of special educational needs. The school has particular strengths in meeting speech language and communication needs allied to moderate to severe learning difficulties and autistic traits; students have a range of educational and/ or diagnoses. The school was previously owned and operated by Royal Borough of Kensington & Chelsea Council but was converted to a Co-operative Academy Trust in May 2015. Since this time, the number of pupils has increased from 89 to 107. The school is currently oversubscribed and has had to turn away a significant number of new referrals.
- 2.2 The school is a special academy which has formally adopted the values of the cooperative school movement. It is currently exploring opportunities to work collaboratively with cooperative and other schools in the area.
- 2.3 The school provides a curriculum based on the needs of the students, which is highly modified and adapted to meet their needs. The school provides a very specialised form of education to students with complex special educational needs, and evidence is that demand for spaces at the school will continue to increase. The school currently provides a range of educational facilities across the site together with both pupil and staff accommodation. It is of particular importance that the school can continue to operate from its current location as a 'Forest School'. The natural environment around the school offers numerous learning opportunities for specialist needs, with 70 acres to explore. The school currently has two trained forest school leaders, who have worked to develop areas for the students to explore, cook outdoors and learn. The sessions are adaptable to meet the varied needs of the students, ensuring inclusivity.
- 2.4 Staff are drawn from the local area and also from further afield – those who travel greater distances largely have to travel by car, although by car-sharing is encouraged, and there is limited availability of staff accommodation on site. The site is well located in terms of transport links, being a short distance from the centre of Swanley and close to the junction of the M20 and M25.
- 2.5 The school has recently undertaken a consultation with parents on the growth of the school to accommodate more pupils, and is currently preparing a site-wide strategy to maximise the potential of the site and to modernise and enhance the existing facilities whilst retaining the areas of undeveloped land to accommodate outdoor learning and the calm setting needed by the pupils.
- 2.6 The school is currently exploring the potential to expand its age range to accommodate younger children, consistent with primary school ages, as well as older pupils up to the age of 25, who would be offered apprenticeships. This growth in pupil numbers, in addition to the current number of

referrals within the school's existing age range, will increase the need to enhance the existing facilities on the site.

- 2.7 Furthermore, the existing buildings on the site are not fully accessible to disabled students or staff, and require extensive adaptations. Given the constrained internal layout and footprint of these existing buildings, some limited extensions may be necessary in order to provide disabled access facilities such as lifts, whilst the condition of some of the smaller buildings on the site may necessitate more comprehensive replacement. Meanwhile the school is investing in modernising the quality of residential accommodation for those pupils who board at the school on a weekly basis.
- 2.8 The school is also investing in additional facilities to enhance the educational experience on the site, including the new hairdressing facility and café within the gatehouse building, and is exploring the potential to provide additional facilities to enhance pupils' learning.

3. REPRESENTATIONS ON THE DRAFT LOCAL PLAN

Draft Policy 1: A Balanced Strategy for Growth in a Constrained District

- 3.1 Policy 1 seeks to identify the overall spatial strategy for growth in the District, having regard to the need for housing, employment, community facilities and infrastructure requirements, and the various constraints identified. The identified development need for the District is based on the new standardised methodology for housing, which sets a revised OAN figure of 13,960 new homes, as well as 11.6 ha of employment land.

It is currently unclear whether the Local Plan will identify requirements to meet these identified needs in full. We would encourage the Council to explore all options to meet its development needs in full, in accordance with the requirements of paragraph 11 of the NPPF, and to ensure that the provision of appropriate community facilities and social infrastructure, such as school capacity, accompanies this growth and is supported in relevant policies.

- 3.2 We note that the draft Plan intends to focus development within the main settlements, including building at higher densities on non-Green Belt land. The four towns within the District – Sevenoaks, Swanley, Edenbridge and Westerham, will be the initial focus for development. The re-use of previously developed land is also encouraged, with sites allocated for development in the Green Belt only where Exceptional Circumstances exist, in accordance with national policy.

- 3.3 Our client broadly supports the strategy set out within Policy 1 with regard to encouraging the re-use of previously developed 'Brownfield Land', including land in the Green Belt, where it is situated in sustainable locations. This is in accordance with the National Planning Policy Framework (NPPF, 2018) which permits that limited infilling or the partial or complete redevelopment of previously developed land whether redundant or in continuing use (excluding temporary buildings), which would:

- *Not have a greater impact on the openness of the Green Belt than the existing development;*
or
- *Not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.*

- 3.4 This is a reasonable approach, but clearly further land will be required to meet the needs of the District, and thus Policy 1 also refers to allocating land in the Green Belt where Exceptional Circumstances can be demonstrated. The supporting text indicates that one such potential option

currently being considered by the Council as a draft allocation is the land between Beechenlea Lane and Highlands Hill in Swanley, which we discuss further below.

Draft Policy 2 – Housing and Mixed Use Site Allocations

- 3.5 Our Client notes that the land identified within Policy 2 between Beechenlea Lane and Highlands Hill, Swanley covers an area of 20.8 ha, and is currently being considered as a draft allocation for approximately 750 new dwellings along with supplementary community infrastructure and open space (MX54b) (Appendix 1). Our client considers that the allocation would significantly alter the context of Parkwood Hall School, shifting the settlement boundary to the north and east, creating a more urbanised surrounding setting. As a Green Belt site, Exceptional Circumstances will be required to justify its release. It is our understanding that as part of the draft Local Plan consultation process that this site will be tested by the Council.
- 3.6 The draft Plan notes the following social and community infrastructure benefits associated with the proposals, which may contribute towards local Exceptional Circumstances:
- Public open space, including a leisure/cycle trail, viewpoint, allotments and children’s play areas;
 - Land for an extension to the existing Downview Primary school including to facilitate new classrooms and provision of/pick up point for school-children;
 - Transport improvements;
 - Land for a healthcare facility;
 - Land for an indoor multipurpose sports hall and outdoor sports pitch;
 - Provision/ funding of a new road bridge crossing over the railway.
- 3.7 The site promoter has submitted a number of masterplan options for the land between Beechenlea Lane and Highlands Hill to support discussions with the Council. We note that the illustrative masterplan options include the proposed closure of Beechenlea Lane adjacent to Parkwood Hall School and redirection of traffic through the site to the west. Parkwood Hall School would welcome the opportunity to engage with the site promoters and the Council to understand further the potential implications of the allocation in this regard, and to ensure any potential adverse impacts of the development are appropriately mitigated. We note that one option in particular presented by the site promoters appears to include the potential to extend development relatively close to the southern boundary of the school’s land, and we would be keen to ensure this would not have an unduly detrimental impact on the peaceful setting of the school and the ability of the school to use their land for outdoor learning.
- 3.8 Our client notes that the development of the land to the west of Beechenlea Lane could present opportunities to enhance the operation of the school, such as providing additional parking facilities

at the park and ride. Meanwhile the school may be able to provide additional elements to the proposed leisure trail, or open up parts of the school grounds outside school hours to the benefit of the local community, and would thus welcome the opportunity to discuss these matters further with the site promoters and Council officers to establish how the proposed allocation would best integrate with the surrounding area including the school.

Draft Policy 4: Development in the Green Belt

- 3.9 Our client supports the overall policy aspiration for protecting the Green Belt. In particular we broadly endorse the position set out with regards to extensions and replacement buildings in the Green Belt. This policy outlines that proposals to extend or replace buildings in the Green Belt will be permitted where the design of the proposal does not materially harm the openness of the Green Belt through disproportionate scale, bulk or visual intrusion.
- 3.10 We note that harm is caused where the openness is not preserved and this should represent the test for applications. However, it is important to fully understand the context of 'preserved' which does not mean impact in terms of simply change. Instead our client is of the view that preserved should mean 'not unduly harmed'.
- 3.11 In this context, future aspirations of the school to extend, to a limited scale, existing teaching and supporting facilities should be considered having regard to an assessment of the harm to openness. The school is surrounded on all sides by an established mature woodland which screens built form protecting the openness of the Green Belt.
- 3.12 Currently the Green Belt policy makes no reference to the Green Belt exception criteria in paragraph 145 of the NPPF (2018) (criteria g) which refers to limited infilling or the partial or complete redevelopment of previously developed land. We would encourage the Council to include this additional criteria within the Local Plan as this will form an important component of small scale Green Belt development.
- 3.13 We would encourage the council to consider making an additional reference to the prospect of limited educational development at existing sites potentially being appropriate subject to its impact on openness and consistency with national Green belt Policy. This is particularly important in the context of a significant need to deliver educational capacity within the District and the limited availability of suitable land.
- 3.14 Paragraph 143 of the NPPF (2018) sets out that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in Very Special Circumstances. In this regard, our client encourages the Council to include greater detail within draft Policy 4 in relation to Very Special Circumstances, giving additional guidance to decision makers as to when Very Special

Circumstances may exist, such as where the proposals would support the enhancement of key infrastructure or community facilities (such as, for example, schools).

Draft Policy 18: Health and Wellbeing, Air Quality, Climate Change and Flooding

- 3.15 This policy indicates that proposals which support healthy living opportunities, promote social inclusion and improve community cohesion will be supported where they are in accordance with other relevant policies. Our client supports the principle of this policy. The School currently plays a key role in supporting health and wellbeing, and meeting the social and the educational needs of the community.
- 3.16 Notwithstanding, we would encourage the Council to develop a separate policy relating to education uses, as a key element of social infrastructure in the District. Such a policy may acknowledge the School's unique ability to meet special learning needs within the local area. Currently the draft Plan does not include a specific policy focused on educational facilities. In our view this is a deficiency with the current version of the Plan in terms of failing to deliver a clear vision for addressing increased educational needs within the District and supporting the growth and enhancement of existing facilities. We encourage an educational policy to be added to the plan, demonstrating how such facilities will form an integral part of development within the district, supporting housing growth outlined by the Council.
- 3.17 Paragraph 94 NPPF (2018) outlines the importance of providing sufficient choice of school places to meet the needs of existing and new communities. Sevenoaks District Council have a clear responsibility to take a proactive positive and collaborative approach to meeting this requirement, and to widen choice in education. Paragraph 94 goes on to assert that Local Planning authorities should give weight to the need to create, expand or alter schools through the preparation of plans and decisions, and work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted. There is little evidence in the current version of the Plan that paragraph 94 of the NPPF is being fully satisfied across the full spectrum of educational provision.
- 3.18 The Core Strategy currently outlines a set of infrastructure improvements including addressing the need for additional capacity for primary school places are required in Sevenoaks and Swanley. This policy outlines that this will be provided through extensions to existing primary schools. We would endorse a new educational policy to include similar wording referring to specific capacity requirements of schools.
- 3.19 In accordance with Paragraph 94 of the NPPF (2018) we would encourage the Council to address the educational needs of the District within a separate specific policy. We would welcome an opportunity to discuss how the School could better help support the planned expansion of Swanley,

providing specialist learning facilities to complement upgraded facilities at Downsview School, supporting the plan's site allocations.

- 3.20 We acknowledge the council's intention for this policy to ensure that education facilities are required to provide a Health Impact Assessment (HIA), setting out the expected impact on health, wellbeing and safety. A future planning application for the site would be prepared with a HIA where required.
- 3.21 We support the policy wording where it seeks to support healthy and safe communities, through new development being located within easy access to services and facilities, create opportunities for better active travel, be designed to minimise threats and improve public safety. The indication that developments that reduce health inequalities and social exclusion will be supported is a positive policy position and we would suggest that the nature of any future school expansion would meet these criteria and as such should be acknowledged in Policy 18.

4. SUMMARY AND CONCLUSIONS

- 4.1 This document sets out a series of representations on the Draft Local Plan on behalf of our client, Parkwood Hall Co-operative Trust. Our client owns the land identified within the enclosed Site Location Plan, and is committed to the continued provision and delivery of improved educational facilities. This site therefore has the ability to continue to make a valuable contribution towards meeting the District's special educational needs, as well as providing additional benefits in terms of health and wellbeing of its students and as a local employer, and cooperating with other facilities in the area.
- 4.2 Our client supports the principle of a number of current policies within the draft plan but seeks greater recognition of the future needs and objectives of the school. We consider that the Plan should pay particular regard to the recognised need for further space for special educational teaching in the District, and acknowledge the role that the school can play, which is likely to be increased further by the planned growth within Swanley and the wider District. We would request that the Council make specific reference to Parkwood Hall, allowing the limited and proportionate expansion of the existing site facilities, recognising that it is screened on all sides by established woodlands and the impact on Green Belt openness would be very limited.
- 4.3 We welcome the opportunity to work constructively and collaboratively with the Council to shape the emerging proposals for the site. Our client is broadly supportive of the Council's proposed overall development strategy as set out within the current consultation draft of the Local Plan. However, as detailed above there are certain aspects which we would encourage the Council to consider further in order to ensure that all the proposed policies are fully robust and sound, having regard to the tests set out within paragraph 35 of the NPPF (2018). Please do not hesitate to contact Icen Projects should you wish to discuss any of these matters further in the meantime.

A1. SITE LOCATION PLAN

