

**LOCATION:** [GATWICK SCHOOL, 23 GATWICK ROAD, NORTHGATE, CRAWLEY](#)  
**WARD:** Three Bridges  
**PROPOSAL:** PERMANENT CHANGE OF USE FROM OFFICES (B1) TO CO-EDUCATIONAL SCHOOL (D1), INCLUDING NEW EXTERNAL OVER-CLADDING, NEW WINDOWS AND DOORS, NEW BUILD SPORTS HALL AND STAIRWAY, REVISED CAR PARKING, EXTERNAL PLAY AREAS AND LANDSCAPING.

**TARGET DECISION DATE:** 30 May 2018

**CASE OFFICER:** Mrs V. Cheesman

**APPLICANT'S NAME:** Education and Skills Funding Agency  
**AGENT'S NAME:** JLL

**PLANS & DRAWINGS CONSIDERED:**

Drawing Number	Revision	Drawing Title
PL002	4	Site Location & Existing Site Plan
PL003	9	Proposed Site Plan
PL008	3	Existing Ground Floor Plan
PL009	3	Existing First Floor Plan
PL010	3	Existing Roof Plan
PL011	11	Proposed Ground Floor Plan
PL012	10	Proposed First Floor Plan
PL013	8	Proposed Roof Plan
PL014	3	Existing Elevations (North & East)
PL015	3	Existing Elevations (South & West)
PL016	9	Proposed Elevations (North & East)
PL017	8	Proposed Elevations (South & West)
PL018	7	Proposed Sports Hall Elevations
PL019	3	GA Proposed Sections
PL020	3	Proposed Site Sections
PL021	5	Street Scene & Material Proposals
PL022	7	Building 3D Views
LLD1253 LAN-DWG-SK400.21.11.17		Cross section: Timber Log Retaining Wall

**CONSULTEE NOTIFICATIONS & RESPONSES:-**

1. GAL Aerodrome Safeguarding No objection subject to conditions and informatives
2. GAL Planning Department Policy ENV11 is imperative in the determination of this application. Concerns at potential exposure levels to aircraft noise if an additional runway to the south were to be realised at Gatwick Airport. Noise mitigation measures must be delivered at the applicants' expense as part of this application and therefore installed prior to the opening of an additional runway to the south. This should be secured by a s106 agreement to include the noise mitigation measures and a set floor

layout plan. A post construction acoustics report is also required.

3. Environment Agency  
No comments to make
4. WSCC Highways  
Comments x5 – concerns raised as to whether this is an appropriate location for a school. The access arrangements and associated works are appropriate and acceptable. In terms of the impact on the road network there is an impact on the am peak but the impact is not severe or can be mitigated. With the data submitted and assumed dwell times parking demands can be accommodated within the site most of the time  
Comments made on aspects of the Car Park Management Plan. Overall, no objections subject to conditions and legal agreement.
5. WSCC Education  
The school plays a significant part in catering for the demand for school places in Crawley. It has alleviated pressure on existing schools. There will be a shortfall of secondary places and if permission is not granted this will exacerbate an already significant problem.
6. Police  
No objections. Comment that good management of the parking area inside and outside of the school grounds will be required when student numbers are increased. Are reassured that the parking plan reflects the desire to reduce congestion to the local community. Pleased to note that community ties have been made to explore and further implement off-site parking for staff
7. Metrobus  
The bus network provides frequent services to the school for pupils and staff. Some concerns about the on site parking issues impacting upon access to Tinsley Lane . A contribution towards funding an additional bus service on the route 200 is required.
8. CBC Drainage Officer  
No objection subject to conditions
9. CBC Planning Arboricultural Officer  
No objection subject to conditions regarding tree protection, no dig construction and landscaping / tree replacement
10. UK Power Networks  
No response received
11. CBC Environmental Health  
Contaminated Land – no objections subject to Conditions  
  
Noise – policy ENV11 applies and noise mitigation will be required for current road noise and future aircraft noise . The latest noise report shows that the proposed sound reduction from the façade and roof refurbishment works will achieve the internal noise levels required. The works should be implemented in full and a post completion survey is required . Also comments that the outdoor sports pitch would experience high levels of noise and so can only be used until the wide-spaced second runway is operational or it is adequately enclosed.

Air Quality – the assessment found no existing or predicted exceedances of air quality objectives from road traffic sources, or VOCs (Volatile Organic Compounds) and measures are recommended to mitigate the impact of dust during the construction phase. The main issue to consider would be whether the commercial interests on Manor Royal would be compromised by the existence of the school if statutory nuisance were to restrict business activities as a result of introducing sensitive receptors to an industrial/commercial location.

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| 12. | CBC Refuse & Recycling Team            | Issues raised regarding bin collection arrangements and travel distances.  |
| 13. | CBC Energy Efficiency & Sustainability | Recommend conditions regarding energy, water efficiency and for buildings to be network ready for a District Energy Network.                 |
| 14. | CBC Economic Development               | Objection raised due to conflict with Local Plan policy for the economic approach for Manor Royal. Not an appropriate location for a school. |
| 15. | Gatwick Diamond Grow Group             | No response received   |
| 16. | WSCC Fire & Rescue                     | No response received   |

#### **NEIGHBOUR NOTIFICATIONS:-**

The application was publicised by press and site notices.

#### **RESPONSES RECEIVED:-**

34 responses in support have been received comprising 8 from addresses outside the borough, one from the head teacher and 25 from addresses in Crawley.

#### **REASON FOR REPORTING TO COMMITTEE:-**

Major development based on site area of over 1ha.

#### **THE APPLICATION SITE:-**

- 1.1 The application site of 1.2ha is situated on the east side of Gatwick Road, on the south side of Tinsley Lane and to the west of Wheatstone Close. The site comprises 2 former office buildings, with extensive areas of hard surfacing /car parking to the front (north) and rear (south) and some landscaping along the road frontages, and was previously known as Gatwick 23.
- 1.2 Gatwick Free School has occupied the site since September 2014, initially operating with the benefit of the one year permitted development rights under Part 4 Class C of the Town and Country Planning (General Permitted Development) Order 1995 (as amended) . In 2015 temporary planning permission was granted until July 2017 for a maximum number of 440 pupils, comprising 180 primary pupils and 260 secondary pupils. A further temporary permission was granted in December 2017 expiring at the end of August 2018 for a maximum number of 537 pupils, comprising 237 primary pupils and 300 secondary pupils.
- 1.3 The school currently (December 2020) has a total of 829 pupils (366 primary and 463 secondary) against a total potential capacity of 1020. There are currently 77.2 full time equivalent members of staff, which at maximum capacity could rise to 105 (FTE). The school occupies both of the buildings

on the site which have been fitted out offering a range of academic subjects with the required class rooms and equipment.

- 1.4 The site is within Manor Royal in the Main Employment Area, and is within the Northern Industrial Zone identified in the Manor Royal Design Guide SPD. This area has a commercial/industrial character with predominantly offices, manufacturing and industrial buildings and uses. The location is dominated by the road network including Gatwick Road which is a Class C highway, single 2-lane carriageway with bus lanes partially along both sides. Tinsley Lane North and Wheatstone Close are Class D highways, single 2-lane carriageways. Tinsley Lane North has a pavement and grass verge on the southern side and on street parking occurs on the southern side of the road and on the verges. Wheatstone Close has no grass verges, but does have a pavement on either side, with on-street parking along the eastern side of the road and on the pavement on the western side. At the end of Wheatstone Close is the Metrobus depot. Cobham Way is also a Class D highway, single 2-lane carriageway. It has no grass verges, but does have a pavement on either side, with on-street parking on the western side of the road, and partially on the pavement on the east side.
- 1.5 The site is approximately 2.9km north of Crawley town centre. The nearest bus stops are approximately 60 metres (southbound bus stop) and 75 metres (northbound bus stop) from the entrance of the school. Gatwick Road has a segregated full-time bus lane that runs along the southbound route and an intermittent segregated bus lane along the northbound route. There are existing accesses along all 3 road frontages of the application site and there is a row of trees along the northern boundary with Tinsley Lane North/Gatwick Road which are protected by a Tree Preservation Order.
- 1.6 As the site lies within the Manor Royal Main Employment Area it is covered by Article 4 Directions (dating from July 2016 and October 2017) removing permitted development rights to convert employment uses to residential.

#### **THE PROPOSED DEVELOPMENT:-**

- 2.1 The application was submitted in March 2018 prior to the expiry of the last temporary planning permission and seeks a permanent planning permission to continue to operate the free school from this site. The school would cater for children from reception year through to year 11 and so would be a 'through school' taking children from ages 4 – 16.
- 2.2 The school would comprise a 2 form entry at primary level (capacity 420 pupils), and 4 form entry at secondary level (capacity 600 pupils), making a total of 1020 pupils for the school as a whole. The school would have the potential to operate at this capacity by 2020. Staffing levels at this point would be 105. The intake per year would be 60 reception children and 120 for year 7 pupils. Given the current pupil numbers of 829 as at December 2020 the school is operating at approx. 81% of the proposed final capacity.
- 2.3 The original 2 storey open plan offices have been converted with classrooms and other facilities and the central space of each building provides multi-purpose hall facilities with the double height atrium feature retained. The inter-connecting block would become the new main entrance and dining hall at ground floor level, with a library above.
- 2.4 In addition to the change of use, a number of building operations are proposed, namely the recladding of the building and insertion of additional/replacement windows, the erection of an extension to house a new staircase, the construction of a hard surfaced and fenced Multi Use Games Area (MUGA) and hard surfaced areas to be used as external courts/outdoor PE, the erection of a sports hall building and the creation of an additional play area.
- 2.5 The access and car parking arrangements will comprise the following:
  - pedestrian access from Gatwick Road and Tinsley Lane North
  - main vehicular access into the school from Tinsley Lane North, with egress onto Gatwick Road giving access to the front car parking areas for staff, visitors and parents
  - the two existing access points on Wheatstone Close are to be widened and adjusted to facilitate vehicular access to the rear of the site where there would be the sports hall, a MUGA, hard

surfaced play areas and the existing substation. The hard surfaced play areas to the rear would also be used for pupil drop off in the mornings

- cycle parking is to be provided at the front of the site in the form of 6 shelters, with 5 stands in each, accommodating 60 cycles in total.

2.6 Since the application was submitted, there have been very extensive discussions following consultation responses and consideration of the application details, resulting in the submission of a range of updated and amended plans and associated documents.

### **PLANNING HISTORY:-**

3.1 CR/2014/0531/NTF: NOTIFICATION FROM THE SECRETARY OF STATE FOR EDUCATION UNDER CLASS C.2 PART 4 OF SCHEDULE 2 OF THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) ORDER 1995, FOR USE AS A STATE FUNDED SCHOOL: This was a notification to the Local Planning Authority that the Secretary of State approved the use of the site as a state funded school under these permitted development rights and that it was due to open on 1<sup>st</sup> September 2014. It granted permission for one academic year, which was defined as running from 1<sup>st</sup> August and ending with the 31<sup>st</sup> July. The temporary permission therefore expired on 31<sup>st</sup> July 2015.

3.2 CR/2015/0020/FUL: CHANGE OF USE FROM OFFICES (B1) TO A CO-EDUCATIONAL SCHOOL (D1) WITH NEW BUILD SPORTS HALL, INCLUDING PARKING, EXTERNAL PLAY AREAS AND LANDSCAPING WORKS: The application was for the permanent use of the site for a school for 1020 pupils. It comprised the change of use of the buildings on the site, with recladding and replacement windows, erection of a new entrance feature, the construction of a hard surfaced Multi Use Games Area (MUGA), the erection of a sports hall building to the rear and a linking canopy between the school building and the sports hall. 13 staff parking spaces were to be provided at the front of the site, together with 46 for parents of primary school pupils, and set down/pick up for secondary pupils along the access route. To the rear of the site 10 staff parking spaces were proposed with 48 spaces for parents on the hard surfaced area and MUGA areas.

3.3 The application was refused for the following reasons:

*“1. The change of use of the existing buildings to a free school and erection of a sports hall, in this location in the Main Employment Area of Manor Royal and away from surrounding residential areas would not achieve safe and/or convenient access for pedestrians or cyclists and so would not be consistent within the principles of sustainable development, given the significant reliance on the private car for staff and pupil journeys to and from the school.....”*

*“2. It has not been demonstrated to the satisfaction of the Local Planning Authority that the change of use of the existing buildings to a free school and erection of a sports hall, would provide an acceptable standard of development, in terms of the scale of the proposal, the layout of the site and the site coverage, parking and access arrangements and provision of outdoor space, to enable the development to meet its own operational requirements and provide a suitable environment for the future pupils. The proposal overall is considered to represent an over development of the site.....”*

*“3. It has not been demonstrated to the satisfaction of the Local Planning Authority that the proposal makes adequate provision on the site for the vehicle parking associated with the proposed school use. The proposal would therefore increase the pressure for on-street parking at these times in an area where insufficient space is available. The proposal has the potential to result in severe detriment to highway safety and the free flow of traffic on the local highway network.....”*

*“4. It has not been demonstrated to the satisfaction of the Local Planning Authority that the proposal provides for suitable noise mitigation measures to address the noise environment....”*

*“5. It is considered that the scale of this proposal, in this location in the Main Employment Area of Manor Royal, with the associated traffic and parking demand, would have a detrimental effect on the wider area in terms of traffic congestion and exacerbating on-street parking problems, which would have an adverse impact on the economic role and function of Manor Royal as a main employment area and the wider economic function of Crawley. The erection of the sports hall would also prejudice any potential reuse of the building for office or other B1 purposes, as the level of space for car parking would be significantly reduced.....”*

“6. An agreement is not in place to ensure that the appropriate infrastructure provisions can be secured to support the development and the development...”

- 3.4 CR/2015/0638/FUL: TWO YEAR TEMPORARY CHANGE OF USE FROM COMMERCIAL OFFICES TO CO-EDUCATIONAL SCHOOL: Temporary permission was granted until 31<sup>st</sup> July 2017, with a limit on the number of pupils at a maximum of 440, comprising 180 primary pupils and 260 secondary pupils. Conditions were also imposed in relation to the need for a School Travel Plan, and that the use should be implemented in accordance with the car park management plan, staggered timetable and provision of an external play area.
- 3.5 It was considered that the reduced scale of the proposal, and the proposed use for a 2 year temporary period, had addressed the previous concerns. The impact on the character and business function of the area and associated traffic flows and parking requirements were considered to be at an acceptable level and satisfactory for a temporary period.
- 3.6 CR/2017/0596/FUL – TEMPORARY PERMISSION TO ALLOW CONTINUED USE OF SCHOOL FOR ONE FURTHER ACADEMIC YEAR WITH A MAXIMUM OF 537 PUPILS: A further temporary permission was granted until 31<sup>st</sup> August 2018. A condition was attached limiting the maximum number of pupils to 537, comprising 237 primary and 300 secondary pupils. Other conditions related to the operation of the submitted Travel Plan and staggered timetable.
- 3.7 It was considered that the relatively limited increase in scale of the school from the earlier temporary permission comprising an additional 97 pupils and 7 staff for one further year was acceptable for this further period and would allow for the continued B Class use of the building after this period has expired.

## **PLANNING POLICY:-**

### **National Planning Policy Framework (2019)**

- 4.1 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development and that there are three overarching objectives - economic, social and environmental. These objectives are interdependent and need to be pursued in mutually supportive ways. At the heart of the Framework is presumption in favour of sustainable development. Relevant paragraphs are:
- Paragraph 11: presumption in favour of sustainable development – this means that development proposals that accord with an up – to –date development plan should be approved without delay.
  - Section 6: Building a strong, competitive economy - significant weight should be placed on the need to support economic growth and productivity  
Section 8: promoting healthy and safe communities – decisions should aim to achieve healthy, inclusive and safe places. Decisions should ensure an integrated approach to considering the location of housing, economic uses and community facilities and services. 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. Local Planning Authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:*
    - a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications, and*
    - b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.’*
  - Section 9: Promoting sustainable transport – states that transport issues should be considered from the earliest stages of plan-making and development proposals. Paragraph 108 states in assessing applications that it should be ensured that :
    - a) “appropriate opportunities to promote sustainable transport modes can be taken up, given the type of development and its location;*
    - b) safe and suitable access to the site can be achieved for all users and:*

- c) *any significant impacts for the development on the transport network( in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”*

Paragraph 109 advises that *“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety; or if the residual cumulative impacts on the road network would be severe.”*

- Section 11: Making effective use of land – decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- Section 12: Achieving well-designed places. The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

Department of Communities and Local Government - Policy Statement – planning for schools development (August 2011)

4.2 This document sets out the Government’s commitment to support the development of state-funded schools and their delivery through the planning system. It says that the planning system should operate in a positive manner when dealing with proposals for the creation, expansion and alteration of state-funded schools. The following principles should apply:

- There should be a presumption in favour of the 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.

Crawley Borough Local Plan 2015 - 2030

- 4.3 Policy SD1 Presumption in Favour of Sustainable Development: In line with the planned approach of Crawley as a new town, and the spatial patterns relating to the neighbourhood principles, when considering development proposals the Council will take a positive approach to approving development which is sustainable.
- 4.4 Policy CH1: Neighbourhood Principle states that the neighbourhood structure of the town is to be maintained and neighbourhood centres are to remain as the focal point for the local community, providing facilities that meet their day– to–day needs within walking distance.
- 4.5 Policy CH2: Principles of Good Urban Design States that all proposals for development in Crawley will be required to respond and reinforce local distinctive patterns of development and landscape character, and create continuous frontages onto streets and spaces enclosed by development which clearly defines private and public areas.
- 4.6 Policy CH3: Normal requirements of all New Development- All proposals for development in Crawley will be required to:
- a) *“Be based on a thorough understanding of the significance and distinctiveness of the site and its immediate and wider context.*

- b) *Be of high quality in terms of their urban, landscape and architectural design and relate sympathetically to their surroundings in terms of scale density height, massing, orientation, views, landscape, layout, details and materials.*
- c) *Provide or retain a good standard of amenity for all existing and future occupants of land and buildings.*
- d) *Retain existing individual or groups of trees that contribute positively to the area and allow sufficient space for trees to reach maturity. Sufficient space should also be provided in private gardens that would not be overshadowed by three canopies and proposals should ensure that rooms within buildings would receive adequate daylight.*
- e) *Demonstrate how "Secure by Design" principles and guidance set out in the "Secured by Design" design guidance have been incorporated into the development.*
- f) *Meet the requirements necessary for their safe and proper use, in particular with regard to access circulation and manoeuvring, vehicle and cycle parking loading and unloading, and the storage and collection of waste.*
- g) *In respect of residential schemes, demonstrate how the Building for Life 12 criteria (as amended) for the evaluation of the design quality of residential proposals have been taken into account and would be delivered through the scheme."*

- 4.7 Policy CH6 Tree Planting and Replacement Standards states that any trees lost as a result of the development must be replaced or mitigated. Where possible the trees are expected to be provided on site although, where this is not feasible, commuted sums will be sought in lieu.
- 4.8 Policy EC1: Sustainable Economic Growth states that the Council will ensure that all suitable opportunities within the borough are fully explored to enable existing and new business to grow and prosper.
- 4.9 Policy EC2: Economic Growth in Main Employment Areas states that proposals for employment generating development at the seven locations identified within the policy will be supported where they contribute to the specific characteristics of the main employment area, and overall economic function of the town, through providing a mix of employment generating uses.
- 4.10 Policy EC3: Manor Royal states that development that is compatible with the area's economic function and role in the wider sub-region will be permitted where it falls within the B Use Class and would result in the reuse, intensification, or change of use of the land or buildings.
- 4.11 Policy ENV6: Sustainable Design and Construction requires all development to demonstrate how it will meet sustainability objectives both in its design and construction processes and also specifically to achieve BREEAM excellent for water and energy credits where viable.
- 4.12 Policy ENV7: District Energy Networks requires that all development proposals within a priority area for District Energy Networks should be 'network ready' for connection to a DEN.
- 4.13 Policy ENV8 (Development and Flood Risk) advises that development proposals must avoid areas which are exposed to an unacceptable risk from flooding and must not increase the risk of flooding elsewhere.
- 4.14 Policy ENV9 Tackling Water Stress requires non-residential development to meet BREEAM Excellent, where technically feasible and viable.
- 4.15 Policy ENV11 Development and Noise advises that residential and other noise sensitive development will be permitted where it can be demonstrated that users of the development will not be exposed to unacceptable noise disturbance from existing or future uses. To achieve this, this policy should be read in conjunction with the Local Plan Noise Annex.
- 4.16 Policy ENV12 Air Quality states that proposals that do not result in a material negative impact on air quality will normally be permitted. An air quality assessment is required outlining development impacts and mitigation.

- 4.17 Policy IN1 Infrastructure Provision states that development will be permitted where it is supported by the necessary infrastructure both on and off site and if mitigation can be provided to avoid any significant cumulative effects on the existing infrastructure services.
- 4.18 Policy IN3 Development and Requirements for Sustainable Transport: Advises that development should be concentrated in locations where sustainable travel patterns can be achieved through the use of the existing transport network, including public transport routes and the cycling and walking network.
- 4.19 Policy IN4 Car and Cycle Parking Standards states that development will be permitted where the proposals provide the appropriate amount of car and cycle parking to meet its needs when it is assessed against the borough council's car and cycle standards.
- 4.20 Policy IN5 Location and Provision of New Infrastructure states that new or improved infrastructure in appropriate locations will be supported to support development or where they add to the range and quality of facilities in the town. Major facilities which serve the whole town or wider area should be located in the most sustainable locations accessible by a variety of means of transport.
- 4.21 Submission Draft Local Plan (Regulation 19)

The Crawley Borough Local Plan is under review. The Council published its Submission Draft Local Plan (Regulation 19) on 6 January 2021, for a period of public consultation that closes on 17 February 2021.

The following policies are of note:

- Policy SD1: Presumption in Favour of Sustainable Development.
- Policy SD2: Enabling Healthy Lifestyles and Wellbeing
- Policy CL1: Neighbourhood Principle
- Policy CL2: Making Successful Places: Principles of Good Urban Design.
- Policy CL3: Movement Patterns, Layout and Sustainable Urban Design
- Policy DD1: Normal Requirements of All New Development.
- Policy DD2: Inclusive Design
- Policy DD4: Tree Replacement Standards
- Policy DD5: Aerodrome Safeguarding.
- Policy IN1: Infrastructure Provision.
- Policy IN2: The Location and Provision of New Infrastructure
- Policy EC1: Sustainable Economic Growth
- Policy EC2: Economic Growth in Main Employment Areas
- Policy EC3: Manor Royal
- Policy EC5: Employment and Skills Development
- Policy EC6: High Quality Office Provision
- Policy EC11: Employment Development and Residential Amenity
- Policy GAT2: Safeguarded Land
- Policy G13: Biodiversity and Net Gain
- Policy SDC1: Sustainable Design and Construction.
- Policy SDC 2: District Energy Networks
- Policy SDC3: Tackling Water Stress
- Policy EP1: Development and Flood Risk
- Policy EP3: Land and Water Quality
- Policy EP4: Development and Noise
- Policy EP5: Air Quality
- Policy ST1: Development and Requirements for Sustainable Transport.

- Policy ST2: Car and Cycle Parking Standards.

### **Supplementary Planning Documents (SPD)**

4.22 The Supplementary Planning Documents are non-statutory documents which supplement the policies of the Local Plan and are applicable to this application.

### **Manor Royal Design Guide and Public Realm Strategy (2013)**

4.23 This document provides the planning guidance in relation to the Manor Royal Business District to ensure new development makes a significant contribution to the uplift of the area and secures high quality development which supports the key business function. It provides details of potential improvement projects that could be delivered by a variety of landowners and agencies to enhance the wider public realm in the business area as a whole. In particular, it requires all development to demonstrate the following:

- New buildings to be of high quality design and urban design.
- Proposals seek to provide active frontages to routes.
- Materials and finishes of good quality and support the principles of identity and sustainability.
- Proposals to achieve a high level of security.
- Surface Water drainage considered.
- Water efficiency measures considered.
- The development must positively contribute to the landscape and identity of Manor Royal.

4.24 With regard to parking the document states that new development must demonstrate how measures to increase the use of more sustainable transport are utilised. Where car parking is proposed, the function and visual impact of the car park layout, as well as its landscaping and relationship with on-site and adjacent buildings, needs to be paramount in site layout and design. Applications need to evidence a commitment to sustainable transport and a reduction in visually intrusive or dominant area of parking.

4.25 In terms of sustainable transport, the SPD requires proposals to create legible routes for pedestrians, cyclists and vehicle drivers to encourage more use of sustainable transport. All proposals should consider opportunities to extend the existing cycle network to improve permeability.

4.26 Gatwick Road is identified as part of the primary road network within Manor Royal and it is stated that the impact and function of Primary Roads throughout the Business District is a critical component that contributes to how the area looks and is used. All development proposals on a primary road should demonstrate how they encourage walking and cycling and create more interesting roadside frontages, increasing biodiversity and ecological value.

4.27 This SPD states in relation to this section of Gatwick Road (north of the Fleming Way junction):

*“In general terms, the existing 3 lane carriageway is 9 to 17m wide with 2m highway verges only outside no.41-71 (odd numbers). There are more generous verges, some of which include tree planting, although these are private soft landscaping areas. The minimum depth of frontage planting is for 10m of shrub planting across the entire primary route site frontage with large scale trees planted to reflect the more informal soft landscaping approach in the vicinity.”*

4.28 The site lies within the Northern Industrial Zone, which comprises two and three storey development and features a prominence of B2 and B8 logistics companies with trade outlets and car showrooms. Development typically comprises fewer active frontages, more prominent servicing areas, and a less spacious public realm with lower quality hard landscaping and less space retained for planting. The aesthetic quality of buildings is generally lower within this zone.

### **Urban Design Guide (2016)**

4.29 This contains guidelines on the standards the Council expects for public design highlighting in particular the importance of massing and materials, public realm, street design and parking and sustainable design. In addition, it states that applicants and developers are encouraged to consider

all the end users that a development and any associated public realm will serve so as to strive to cater to all groups (children and young people, the elderly, disabled people etc.).

- 4.30 For industrial and commercial development consideration should be made of appropriate materials, colours and massing to improve the architectural language (as buildings are often designed functionally with little architectural merit). Greater consideration of the layout of the buildings to the street is encouraged along with opportunities to improve the urban environment and use of landscaping. Walkability and accessibility are important factors in sustainable urban design. All developments should encourage access through walking, cycling and public transport. Developments should encourage the use of public transport, create walkable neighbourhoods and encourage cycling.
- 4.31 It also includes the borough's indicative minimum parking standards. For schools it states these are to be assessed individually within the context of a travel plan using 1 space per 2 staff as a guide.

#### Green Infrastructure SPD (October 2016)

- 4.32 This document includes guidance and interpretation on the requirements of Local Plan policies in relation to Crawley's Green Infrastructure assets. It provides further guidance on CH6: Tree Planting and Replacement Standards.

#### Planning and Climate Change SPD (October 2016)

- 4.33 This SPD sets out advice on making developments sustainable and gives additional guidance on policies ENV6, ENV7, ENV8, ENV9 and IN3.

#### Developer Contributions Guidance Note (July 2016)

- 4.34 This sets out the Council's approach to developer contributions following the introduction of the Community Infrastructure Levy. It provides details of the CIL charges and when s106 contributions will be sought.

#### Regulation 123 List (July 2016)

- 4.35 Regulation 123 of the CIL Regulations requires the council to publish a list of infrastructure that it types of infrastructure that the council intends to fund through CIL and those areas where a Section 106 Planning Agreement or S278 Highways Agreement will be sought. This will ensure that that a developer/landowner is not charged twice for the same piece of infrastructure. As set out in the Regulation 123 list, a Manor Royal contribution of £2 per square metre is required.

### **PLANNING CONSIDERATIONS:-**

- 5.1 As set out above a previous application for the whole school (1020 pupils) was refused in 2015. In considering this current application it is necessary to examine whether the previous 6 reasons for refusal have been addressed and/or circumstances have changed.
- 5.2 The main planning considerations for this application are considered to be:
- the principle of the school use in this main employment area
  - sustainability and highway safety/access/parking considerations
  - the operational needs of the development
  - design/appearance of the alterations and new works
  - quality of the environment for occupiers of the school
  - future uses of the site and impact on economic role and function of the wider Manor Royal area
  - impact on landscaping and trees
  - energy efficiency and sustainable construction
  - contaminated land
  - drainage
  - Manor Royal contributions
  - S106 requirements

## The principle of the school use in this main employment area

- 5.3 The development plan policies that apply to this site aim to ensure that Crawley can meet the economic growth needs of the town as a strategic employment location. The policies direct employment uses to specific locations and protects existing employment uses in these locations. There are also policies aimed at infrastructure provision and especially improving accessibility for all to a wider range of community services, including education.
- 5.4 In terms of economic policies, Manor Royal is identified as the key business location for Crawley, this locality.
- 5.5 Policy EC1 seeks to protect and enhance Crawley's role as the key economic driver in the Gatwick Diamond, enhancing the economic role and function of the main employment areas. The policy identifies an overall need for 57.9 hectares of business land in Crawley over the Plan period to 2030. As a result of Crawley's constrained land supply position, the available business land supply pipeline is only 23 hectares, resulting in a business land supply shortfall of 35 hectares over the plan period to 2030. Since Local Plan adoption, the available business land has continued to reduce as sites are built out, and the land supply pipeline is currently 17.56ha, as per the Employment Land Trajectory (Base Date 1 September 2020). This places particular importance on the need to promote and protect the available land supply for business uses, and the overarching policy position is therefore to retain the available supply of employment land for business use.
- 5.6 Local Plan Policy EC2 states that as a key economic driver in the sub-region, Crawley's main employment areas make a significant contribution to the economy of the town and the wider area. Therefore Main Employment Areas are identified as a focus for sustainable economic growth, each of which has different character and function. The policy states that proposals involving a net loss of employment floorspace in any Main Employment Area, will only be permitted where they are able to demonstrate the following:
- The site is no longer suitable, viable or appropriate for employment purposes, and
  - The loss of any floorspace will result in a wider social, environmental or economic benefit to the town, and
  - There is no adverse impact on the economic role or function of the Main Employment Area and wider economic function of Crawley
- 5.7 Local Plan Policy EC3 deals specifically with Manor Royal and states that Manor Royal is the principal business location for Crawley and instrumental to the success of the wider Gatwick Diamond. The policy states that proposals that are not for B Use Class development will be permitted at Manor Royal if it can be demonstrated that they are of a scale and function that enhances the established role and business function of Manor Royal and would not undermine the business district. It should be noted that the Use Classes Order was revised in 2020 and Class B1 is now incorporated into Class E Commercial, Business and Service.
- 5.8 The school is not a B Class Use and thus in principle could be regarded as contrary to the employment protection policies. The application site is located within the heart of Manor Royal and has resulted in the loss of a purpose built office building. However, it does provide employment, (although its main use is the provision of education services) and it is stated that the ethos of the school is to build upon the links with the business community. Prior to the school's occupation, the office buildings had been empty since 2009 so the opening of the school has resulted in this vacant site being brought back into use. In addition, the school advises that a significant number of parents are employed in Manor Royal and so there is an element of joined traffic movements.
- 5.9 It is appreciated that the building was vacant when the school first moved onto the site, but it should be noted that this was in the height of the economic crisis at that time. In terms of the current situation, the Council has updated its economic evidence and this work takes account of the economic situation post Covid-19 and includes sensitivity checks. The updated evidence continues to identify a significant need for new business land over the forthcoming Plan period. This is specifically within the industrial/storage and distribution sectors, with sufficient land supply in place to cater for Crawley's quantitative office needs. However there is a qualitative need for grade A specification offices, both in Crawley and the wider sub-region. The loss of the office floorspace

from these buildings, which represented one of the few purpose built Grade A offices in Manor Royal, is regrettable.

- 5.10 Notwithstanding this, Policy EC2 relates to all forms of employment floorspace and not just business. The previous temporary permission supported 46 jobs, and currently (December 2020) there are 77, rising to 105 at full capacity. Having regard to the NPPF the proposed use as a public/community use would constitute economic growth and jobs.
- 5.11 In terms of Policy EC3, the submitted Economic Statement explains that the Gatwick School have now operated from the site since 2014 and over this time have sought to encourage and put in place links with the business community, notably through mentoring programmes, work experience and participation in events such as STEMfest.
- 5.12 With regard to infrastructure policies, including local community facilities, Local Plan policy IN5 supports the provision of new educational facilities provided they are located in the most sustainable locations, and accessible by a variety of means of transport.
- 5.13 In this regard, a significant material consideration is the need for additional school places in Crawley to meet the requirements of the current and future population at secondary level, together with central government aims to promote state funded (free) schools. This is evidenced by the permitted development rights afforded to such uses and government policy as set out in the NPPF and the DCLG policy statement which gives significant weight to the establishment and development of state funded schools.
- 5.14 The current school place situation in Crawley, as set out in the Crawley Infrastructure Plan January 2021, is that the primary schools are at 90% capacity and the existing secondary schools are at 96% capacity. Even taking account of the four forms of entry at secondary level currently provided at the Gatwick Free School, new planned housing development in the borough will generate the need for an estimated 6-8 further forms of entry at secondary level. Any loss of the Gatwick Free School places would exacerbate this further. Due to the lack of a suitable site for a new secondary school in Crawley, the Local Plan makes allowance for consideration of education provision on sites allocated for uses including housing. In addition, discussions are taking place with neighbouring authorities. In these circumstances this application, which would result in the provision of a total 1020 school places, including 600 at secondary level, is a significant benefit that must be brought into the planning equation and carry substantial weight in the overall balance of the various factors.
- 5.15 Furthermore, the school is offering to open its facilities out of hours to the wider community, including the Upper Main Hall, Lower Main Hall, Atrium/Exhibition space, Dance Studio, Sports Hall and the MUGA. This could provide corporate and training events, fitness and sports activities. It is argued that this illustrates the positive links that the school has made with Manor Royal and addresses the deficiencies in the provision of conferencing and leisure facilities in the main employment area. These matters can be secured by a s106 legal agreement.
- 5.16 In conclusion, whilst the loss of the office business floorspace is regrettable, this has to be balanced against the direction of national policy for education. The need for school places in Crawley is acknowledged, especially at secondary level. The increased choice of educational establishments this facilitates within the borough and the wider benefits in terms of skills and training is understood. Also the employment element of this use and the community use aspects are also acknowledged. Thus in general terms the operation of an educational establishment within the main employment area of Manor Royal could be acceptable in principle and at a broad overarching level could be argued to be in accordance with the overarching aims of the economic policies set out in EC1, EC2 and EC3 of the Local Plan, as well as being in compliance with policy IN5 by providing additional educational infrastructure.
- 5.17 However, it is also necessary to look in detail at the specifics of this proposal, including the size and scale of the school, the site and its physical characteristics, its Main Employment Area context and the day to day operation of such a facility, as all these aspects will have an impact on Manor Royal and surrounds. In particular the creation of an all through school of 1020 pupils with 105 staff on this limited and physically constrained site within an industrial/commercial area of the borough, and the associated traffic and sustainability implications of this school use, together with the overall scale,

extent and operational needs of the development, will need to be carefully assessed and viewed as part of the overall planning balance. These aspects are assessed in more detail below.

### Sustainability and Highway Safety/Access/Parking Considerations

- 5.18 A key element of Crawley's Local Plan and the NPPF is the requirement for proposals to be based on the principles of sustainable development. Thus, in line with the planned approach of Crawley as a New Town, and the spatial patterns relating to the neighbourhood principle, when considering development proposals the Council will take a positive approach to approving development which is sustainable. These considerations are set out in Policy SD1 Presumption in Favour of Sustainable Development and they then follow through into the other policies of the Plan.
- 5.19 Policy CH1 states that the neighbourhood structure of the town is to be maintained and the neighbourhood centres are to remain as the focal point for the local community, providing facilities that meet their day-to-day needs within walking distance. Policy CH2 states that all proposals for development in Crawley will be required to respond and reinforce local distinctive patterns of development and landscape character, and create continuous frontages onto streets and spaces enclosed by development which clearly defines private and public areas.
- 5.20 Policy CH3 states that all proposals for development in Crawley will be required to meet the requirements necessary for their safe and proper use, in particular with regard to access, circulation and manoeuvring, vehicle and cycle parking loading and unloading. Policy IN3 states that development should be concentrated in locations where sustainable travel patterns can be achieved through the use of the existing transport network, including public transport routes and the cycling and walking networks. Furthermore, the policy states that developments should meet the access needs they generate and not cause an unacceptable impact in terms of increased traffic congestion or highway safety. Development will be permitted unless the cumulative impact on the transport network is severe and cannot be satisfactorily mitigated.
- 5.21 Given the location of the site and the scale of the school proposal, these sustainability and highway concerns were such that the previous application for 1020 pupils was refused. With regard to this current application these issues have been the subject of extensive discussions between the applicants and their agents, CBC officers and WSCC as highway authority. The applicants have been requested to demonstrate that these issues have been fully addressed and this has thus resulted in a range of updated and revised documentation being submitted. The specific issues are considered below in turn.

### *Sustainability*

- 5.22 Firstly, it is necessary to examine whether the principle of this location for a school is acceptable in sustainability terms, in particular in regard to travel mode and movements. The application site is located in Manor Royal, to the east of Gatwick Road, which is a busy highway with significant volumes of traffic. In addition, Tinsley Lane North and Wheatstone Close are heavily trafficked and extensively used for on street parking, which is, in the main, associated with the surrounding businesses and industrial uses that make up Manor Royal.
- 5.23 The site is not in a residential area or neighbourhood and so there is no immediate pupil catchment area serving this school. The only residential property in the immediate environs of the school site is Bowthorpe House (22 flats) to the immediate south of the site. The closest residential streets are Tinsley Lane and surrounds to the south of the site, accessed from Gatwick Road. The northernmost point of Tinsley Lane is some 600m away from the school site. Forge Wood and Tinsley Green lie to the east on the opposite side of the railway line and would access the site via Radford Road, and Tinsley Lane North/Gatwick Road/Cobham Way. The junction of Tinsley Green with Radford Road is 700m away and the centre of Forge Wood 1,270m away and access involves journeys on foot through the Manor Royal employment area including the very highly trafficked Gatwick Road, or side streets such as Cobham Way which have significant traffic flows and extensive levels of on-street parking.
- 5.24 Thus the majority of pupils live some distance from the site, although it is acknowledged that over the time that the school has been operating from this site, more pupils are coming from the Crawley

area. In this respect the agent has referred to the location of the Forge Wood development and the Tinsley Lane Local Plan residential allocation. It should be noted however that Forge Wood is a neighbourhood in itself and already has its own primary school. The Tinsley Lane site is an allocation only, for up to 120 dwellings, and so would not constitute a neighbourhood. The recent outline application for up to 150 units was refused.

- 5.25 Clearly for this application the location of the application site and its overall context in Manor Royal and is within the scope of the influence of the school are the associated traffic movements and parking demands. It is important to note that for the 2015 application that was refused the traffic forecasts and parking demands were based on assumptions made in the Transport Assessment, which were taken from then current school population of 54 pupils. At that time there was uncertainty about the travel origin of pupils, and future modal choice when the school would be operating at capacity, especially as at that moment in time the school was operating with a very limited number of pupils and so travel patterns were not necessarily representative of the current situation.
- 5.26 Since that time the data of actual movements and mode choice have been used to inform the traffic modelling and parking demands data, as suggested by WSCC Highways. The current application has thus updated the position and has used information from surveys undertaken in 2017 and 2019 and data supplied in the Travel Plans (from 2018 and 2019) and the various Transport Assessment documents. During this period the school has also been operating Travel Plans, staggered timetables, and before and after school clubs and activities, all of which have an impact on traffic movements
- 5.27 Using the traffic information now presented, it remains clear that since 2015, at present and as forecast, the overall the majority of trips to the school site have been/will still be by car, given the location of the site within Manor Royal, albeit with an increase in the number of trips by walking, cycling, bus and train.
- 5.28 In 2015 the Travel Plan indicated that there were no trips on foot or by train, with other modes as follows:
- Primary pupils - 80% car, 15% car sharing and 5% bus.
  - Secondary pupils - 45% car, 50% bus and 5% cycle.
- 5.29 Using data from the September 2017 surveys it has been ascertained that the travel modes were:
- Primary pupils - 53.9% car, 24.5 % car sharing, 0.5% park and stride, 3.9% walking, 2.3% cycle, 15.2% bus and 0% train.
  - Secondary pupils - 28.4% car, 13.45% car sharing, 1% park and stride, 2% walking, 5.2% cycle, 48.5% bus and 1.3% train.
- 5.30 A further survey in November 2019 indicates that the travel modes were:
- Primary pupils – 57% car, 25% car share, 1.5% park and stride, 3.5% walking, 1.5% cycle, 10.5% bus and 1% train.
  - Secondary pupils – 25.5% car, 10.5% car share, 2% park and stride, 5.5% walking, 5% cycle, 50% bus and 0.5% train.
- 5.31 This latest mode share survey shows that there has been an increase in the number of primary school pupils travelling to/from the school by car, and decreases in walking, cycling and bus use. For secondary pupils there has been a decrease in car travel, and increases in walking and bus use.
- 5.32 The submitted documents also state that the modal shift amongst pupils that has occurred since the 2015 application is a result from the increased proximity of pupils to the site, accessibility by non-car modes and an increased age profile. In the future further mode shift is considered likely on the basis that the age profile of the school will increase further, the catchment area would shrink as the school becomes more established and both of these factors would allow more pupils to travel by non-car modes.
- 5.33 In the future the pupil travel plan (dated April 2019) aims to effect a modal shift in travel patterns with a 5% and 10% reduction in car trips associated with primary and secondary school pupils

respectively. Thus the target mode share for full school occupancy of 1020 pupils would be as follows:

- Primary pupils - 48.9% car , 24.5% car sharing, 0.25% park and stride, 3.9% walking, 2.3% cycle, 20.2% bus and 0% train (modal shift is the bus)
- Secondary pupils - 18.45% car, 13.3% car sharing, 1% park and stride, 2.05% walking, 11.2% cycle, 52.5% bus, 1.3% train (modal shift is cycle and bus)

- 5.34 It is appreciated that car use has declined from the initial high in 2015 and there has been a rise in the number pupils walking to school, when originally no pupils were walking. However, the level of car related journeys remains high, which is a result of the location of the school away from main residential areas, and outside of any neighbourhood. WSCC have commented that *'in considering the potential for walking trips, there are very few residential dwellings within 2km of the site...Whilst it is acknowledged that there are continuous footways in the local area and suitable crossing facilities available or proposed as part of the current application ...or other applications... the greatest barrier to walking is likely to be distance.'*
- 5.35 In sustainability terms this is not ideal and differs significantly from the usual arrangements in Crawley where schools are sited in appropriate locations to serve the local neighbourhoods and pupil catchment areas, allowing the majority of pupils the option of walking to school, especially those of primary school age.
- 5.36 WSCC Highways have consulted their Safer Routes to School team who have raised *'general concerns about the environment that pupils will encounter everyday given the close proximity to the Metrobus depot and the presence of other large vehicles associated with the nearby businesses. There are also concerns with the on-road parking provisions that are clearly being stretched to capacity. Taking both these points, it is questioned whether this is an appropriate location for a school, albeit it is acknowledged that the suitability is a matter for consideration by the Local Planning Authority.'*
- 5.37 The continued heavy reliance on the private car is of concern and is contrary to national planning advice and the policies in the Local Plan, all of which focus on sustainable development to serve local communities. The application seeks to increase the limited number of pupils previously approved by the temporary planning permissions to the 'full' school population of 1020 pupils. It is acknowledged that there has been an increase in the number of pupils who live within 2km to the site and an increase in pupils travelling to the site by bus and cycling. However, the main mode of pupil travel to the school is by private car and this is not predicted to reduce significantly.
- 5.38 In addition, it is important to note that the overall scale and extent of the school use has not changed from the refused 2015 application. The proposed pupil numbers would remain at 1020 pupils for the primary and secondary combined 'all through' school, with the sports hall and parking areas in the existing grounds. Also the site area has not increased, the proposed pupil numbers have not been decreased, an all through school is still proposed and none of the facilities proposed been relocated to other sites. Whilst car use has declined, and the school has made efforts to promote alternative travel modes, there remains concern at the scale of trips to the site by car and that there are no real options for an alternative to car travel to effect a significant and meaningful modal shift away from the car. These are all factors which if they had been addressed via a revised submission may have offset or reduced, to a limited extent, the unsustainable nature of the development of a school at this scale, on this site, in this location.
- 5.39 Whilst the improvements that have been realised in transport patterns are acknowledged, it is considered that the current application has not addressed this issue sufficiently to set aside the previous concerns and officers are of the view that the sustainability issues remain. However, these must be weighed against the wider benefits of the proposal including the provision of a significant number of school places and the overall planning balance.

#### *Access and impact on road network*

- 5.40 As well as considering whether the principle of this location for a school is acceptable in sustainability terms, it is also essential to ensure that the development would be satisfactory from a highway safety point of view, in terms of the access, impact on the road network and the car parking

arrangements. In addition it is necessary to consider whether any other arrangements or initiatives that have been used and those as now proposed would realistically effect a modal shift away from car use. These elements are considered in more detail below.

- 5.41 Previously there was concern that the volume of traffic associated with the school in this location on the road network had potential to conflict with existing traffic flows on the surrounding streets, resulting in congestion and blockages, particularly at the morning peak period.
- 5.42 It is proposed that the main school access will continue to be taken from Tinsley Lane North, which has on-street parking along its length which can restrict two-way flows. Vehicles would then exit onto Gatwick Road from this front part of the site. The school operates an informal 'no right turn policy' for this exit point, although it is shared with the office to residential conversion at Bowthorpe House, and so cannot be enforced. Access would also be gained from Wheatstone Close, to the rear of the site, to access the sports hall and hard surfaced areas, which would also be used for kiss and drop in the mornings. The width of Wheatstone Close is effectively reduced due to on-street parking and there is extensive car parking on the pavements and verges. The road also provides access to the Metrobus depot and so this route is in regular use 24 hours a day by large vehicles with very limited possibility for passing.
- 5.43 The School has introduced a Travel Plan, which is aimed at reducing the reliance on the car and encouraging other modes of travel. As part of the revised documentation that has been recently submitted there is one Travel Plan for pupils and another for staff.
- 5.44 The school also operates a staggered timetable, breakfast clubs and after school activities in order to stagger traffic flows to the school. These measures sought to lessen the impact of the additional traffic on the highway network at peak times, and to spread the volume of traffic. The staggered timetable has been further revised for the 2019/2020 academic year, resulting in a slightly shorter school day than previously.
- 5.45 The current core hours are 8.45am start for the primary school, with a staggered finish time depending on the year group, being 2.50pm (reception ), 3pm (years 1 and 2) and 3.15pm (years 3 – 6). For the secondary school pupils the core hours are 8.30am – 3.30pm. This is then augmented with an earlier start for a breakfast club of 7.30am and a later finish of 4.15pm (primary) and 4.30pm (secondary) for after school clubs and a 6.00pm finish for child care. These measures would be required to continue and would be needed to be secured via a condition.
- 5.46 WSCC have provided extensive comments throughout the application process, requesting additional information including revised traffic modelling and junction analysis, updated travel plans and parking capacity studies. They have considered the updated traffic information, how the school is currently operating and also assessed the projected increase in pupil numbers.
- 5.47 With regard to the access arrangements and associated works (Tinsley Lane North onto Gatwick Road and Wheatstone Close) WSCC considers them to be appropriate and acceptable. The associated parking restrictions will provide a means to prevent parked vehicles for obstructing the access and junctions. However, it is noted that the proposed parking restrictions would be subject to a further statutory consultation process that is separate to the current planning application, the outcome of which cannot be guaranteed. WSCC advise that contributions by the applicant to cover the cost of advertising, making and implementing the Traffic Regulation Order would be required.
- 5.48 It is also noted that additional parking restrictions in the wider Manor Royal area are mentioned, which may be introduced in the future (by CBC/WSCC). These proposals are independent of this current application and would be subject to what is likely to be a complex and lengthy consultation process. There is also no certainty that any parking controls for the wider area would be implemented. These measures could not be relied upon to assist in lessening the impact of staff and parent parking on nearby streets.
- 5.49 In respect of highway capacity and the volume of traffic to/from the school, access arrangements and flows on the network, the reports have assessed a number of junctions/roundabouts/traffic lights in the Manor Royal area. These have been updated, most recently following the revision to the length of the school day in 2019/2020. For the pm peak the traffic impacts are spread over a

number of hours with primary and secondary finish times occurring at separate times. Thus it is only some staff and some pupils attending after school clubs that depart during the traditional pm network peak hour.

- 5.50 The impacts on the am peak are greater as school flows occur during the main peak times. For the A23 London Road/Gatwick Road roundabout, Gatwick Road/Beehive traffic signals, Gatwick Road/Radford Road roundabout, Hazelwick Roundabout, Manor Royal roundabout, A23 Tushmore roundabout there are either no capacity issues forecast, or there will be increased delays but queue lengths do not increase significantly, or will be improved when planned future improvements of these junctions are undertaken.
- 5.51 In respect of the Gatwick Road/Fleming Way roundabout, there would be increased queuing on the northbound Gatwick Road arm. WSCC suggest that a monitor and manage approach be adopted so that the impact of the school on this roundabout could be considered at the time full occupation is reached and in the event that monitoring reveals a need for mitigation, suitable measures can then be implemented. Possible mitigation measures have been assessed and the proposal is that the works to the northbound bus lane could be implemented to allow both guided and non-guided buses to use the lane.
- 5.52 Officers acknowledge these comments and appreciate that the current transport documents as now submitted are more realistic, being based on actual data gained from the operation of the school. It is also considered that the staggered school timetable does assist in spreading parking demands, albeit that the school day is now shorter than when the school originally opened. The measures set out in the Pupil Travel Plan are also noted and whilst the majority of journeys will continue to be by car, the school is positively encouraging other modes and as the age profile of the school increases as the school expands, with proportionally more older children, the potential for bus travel and cycling would increase.
- 5.53 However it is considered that the staggered timetable does not completely address traffic flow concerns as it should be noted that the am peak period for the school coincides with the peak period for the surrounding businesses, so the impact will be greater as it is concentrated into the same, shorter period, whereas the afternoon peak period for the school is earlier than the general pm peak period and so the effect of school traffic on overall pm traffic flows is not so great, although the staggered timetable does result in some flows into the general pm peak period.
- 5.54 If it were decided that the staggered timetable would be sufficient to set aside the concerns about volumes of traffic, then such an arrangement would need to be secured via a condition or s106 legal agreement.
- 5.55 There is also an element of uncertainty with regard to the take up of breakfast and after school clubs which can assist in spreading parking demands, (which is considered in more depth below). The Pupils Travel Plan of April 2019 shows that the proportion of pupils using this facility is relatively low. Use of such clubs would be voluntary and cannot be guaranteed. For example, primary attendance at breakfast club (from 7.45 – 8.15am) is 15% of total primary pupil numbers and secondary attendance at after school activities (from 16.30 – 17.30pm) is 12.8% of total secondary pupil numbers.
- 5.56 Turning to staff travel patterns, officers have been particularly concerned with the Staff Travel Plan, as despite aims and measures to reduce the use of the car by staff, this has not been realised and the level of car use has risen over time since 2015 and although has reduced recently it is now at essentially the same level as when the school first opened.
- 5.57 Using data supplied with the application, the percentage of staff driving to school in February 2016 was 66.7%, in April 2017 it had increased to 70.4% and in September 2017 it was at 80%. By May 2018 it had reduced to 79.5% and in June 2020 it was at 63%. It is not clear the extent to which the Covid19 situation has impacted on the latter figure.
- 5.58 The Travel Plan initially submitted with the application dated February 2018 indicated that the target for February 2018 was to reduce staff single occupancy car trips from 80% to 24.8%, with the next review scheduled in October 2018.

- 5.59 Following concerns from Officers and WSCC about the high numbers of staff still travelling to the site by car and that modal shift to other more sustainable modes had not occurred to a significant degree despite the stated targets, a specific Staff Travel Plan was requested.
- 5.60 The initial Staff Travel Plan document was submitted in June 2018. This stated that from the September 2017 level of 80%, a follow up survey in May 2018 indicated that the level of car drivers had reduced to 79.5%.
- 5.61 The staff Travel Plan also included the following targets - if the 79.5% level remained by October 2018, then additional measures would be implemented to reach 37.9% by October 2019 and 30.5% by October 2020.
- 5.62 It is acknowledged that the school has introduced the use of limited parking permits for staff, and restricted the number of spaces accordingly. There have been 15 spaces at the front of the site for staff. At full capacity (1060 pupils and 105 staff) and with the new car park layout, there would be for permits for 26 staff cars to park at the front of the site.
- 5.63 The parking standards for staff set out in the Urban Design SPD require 1 space per 2 members of staff, which would equate to a 50% provision. The school at full capacity would have 105 staff and so would require 53 spaces. With the 26 spaces to be allocated on the site there would thus be a shortfall of 27 spaces from this adopted minimum standard.
- 5.64 It is also clear that given current staff numbers and the May 2018 figure of 79.5% level of car use, the staff parking permit measures to date had not been effective in reducing car use and staff must therefore be parking on surrounding streets. The anticipation was that by reducing staff parking spaces on the site this would encourage travel by other means. However, the effect of limiting staff parking had made little difference to car use. This then added to concerns that the objectives of the staff travel plan to reduce this to 37.9% by October 2019 was unrealistic and that future levels of car use by staff and thus associated demands for staff parking will undoubtedly increase, as staff numbers will rise when the school becomes fully operational. At this point staff numbers would be 105, and so a 79.5% car usage rate would equate to 83 members of staff using a car to travel to school, constituting a shortfall of 57 spaces over the 26 spaces to be provided on site. The latest figures of 63% car usage rate would equate to a figure of 66 members of staff, giving a shortfall of 40 spaces.
- 5.65 The School has thus been asked on a number of occasions what other measures they could introduce to reduce staff car use. The initial Staff Travel Plan dated June 2018 referred to additional measures such as a 'park and ride scheme' in relation to car parks in the wider area and convenient bus services, an offsite car parking location operated by a third party for staff to use, use of a minibus to/from park and stride locations, minibuses for travel for staff to/from home addresses. It is not considered that any of these options offer realistic or appropriate alternatives, especially as the location of these facilities are unknown and the likelihood of these being actually secured in the Manor Royal area is low given the very high parking demands that currently exist and the severely constrained parking availability in the surrounding area.
- 5.66 In response to these concerns a revised Staff Travel Plan was submitted in October 2018. This continued to include these general arrangements referring to other car parks in Manor Royal, but no specific locations were mentioned and the revised document also suggested the use of the Town Hall car park, to be combined with the use of buses from The Broadway to reach the site. However, this was not considered by officers to be realistic or practical given the distance from the site and the various stages of the journey that this would involve for staff so the likelihood of school staff parking in the town centre and then travelling by bus to Manor Royal was considered to be low. In addition, this suggestion did not take into account the approved redevelopment proposals for the Town Hall which will have an impact on the overall number of spare spaces.
- 5.67 Your officers were of the view that this situation remained a concern as it is staff travel patterns where potentially a greater impact on modal shift can be achieved and yet that has not happened. It was disappointing that after all this time the school had not produced a realistic and workable travel plan to address the concerns over staff parking.

- 5.68 The proposal would result in a deficit of 27 staff parking spaces when assessed against the number required by the parking standards. This, combined with the current travel patterns of staff whereby 63% are travelling to work by car, (effectively a deficit of 40 spaces), would result in a significant overflow of staff cars on surrounding streets. This would effectively use up any spare spaces that potentially could be utilised by parents, other residents or local businesses.
- 5.69 Following these ongoing concerns with the Staff Travel Plan, the school was again asked to continue to pursue alternative options for staff parking. A revised Staff Travel Plan was submitted in June 2020 and further correspondence in October 2020 confirmed that off-site spaces have been secured at two locations, to be used between 0700 and 1800 hours in term time. These comprise 50 spaces at the Greyhound Public House in Radford Road, which will be used for park and stride and 2 spaces at Copthorne Golf Club which will enable car sharing. Documentary evidence has been supplied to indicate that these 2 locations are available for school use, although there will be a reliance on the owners of those sites allowing the car parking to take place in the future, and so this provision may not be available on a permanent basis. In these circumstances, these elements will need to be covered by a review mechanism in the Staff Travel Plan, which itself will be secured by the s106 legal agreement. If in future years these specific sites are no longer available for the school to use, then under the review mechanism alternative provision would be required. It is understood that the school is also actively looking for further sites in the Manor Royal area.

### *Bus travel*

- 5.70 In terms of bus travel, the site is well served by a number of frequent services. There are 2 bus stops in the immediate vicinity of the application site, one on either side of Gatwick Road, serving 7 routes. The stop on the eastern side of Gatwick Road (southbound) is 60m away from the pedestrian entrance to the school. The northern bound stop is some 75m away on the other (west) side of Gatwick Road and so involves pupils crossing the road. Currently in order to do this pupils have to cross over the south bound lane and stand in the pedestrian refuge and wait for gaps in the traffic before crossing the north bound lane. As part of this application a pedestrian crossing is proposed, the details of which have been subject to a safety audit, which are satisfactory and the crossing would need to be secured by way of s106 legal agreement.
- 5.71 With regard to bus capacity, Metrobus has advised that they '*expect to be able to cater for the additional demand and help the school meet its ambitious mode share targets*' other than in regard to the Route 200 which serves Ifield, Gossops Green and Langley Green. In the am peak two of these services (07:41 and 08:11) would be at capacity from September 2019 given the anticipated growth in pupil numbers.
- 5.72 Metrobus is prepared to provide an additional service on Route 200 during the morning peak hour during term time to arrive at Gatwick Road between 08:00 and 08:20, subject to Gatwick School paying a contribution towards the running costs of that service.
- 5.73 Following extensive discussions on this point, the applicant has now agreed to pay a subsidy for a 3 year period of £28,000 pa. This would need to be secured via a s106 agreement. After the 3 year period Metrobus have advised that they consider that the general demand for this service would grow as other residential development along that route occurs. In consequence the service would be self-supporting and Metrobus advise that at the end of the 3 year period they would be in a position to consider running the service without subsidy from Gatwick School.
- 5.74 A similar approach has been used elsewhere in the Borough for the Forge Wood development where a time-limited contribution has been made by developers to subsidise a bus service until general demand increases.

### *Cycling*

- 5.75 For cycle trips there is a greater potential for this mode to be used as 5km is the acceptable maximum distance. However, consideration needs to be given to the volume and nature of traffic (especially the number of HGV movements) on roads in the vicinity and at the actual destination, given the site's location in Manor Royal, and the potential inexperience of cyclists, especially in the

primary age range, as well as secondary pupils, of this type of journey. WSCC advise that on-carriageway conditions are not favourable to encourage cycling. Also, whilst there are cycle routes in Manor Royal, they are not fully connected and so do not provide continuous links to nearby neighbourhoods. There is a segregated cycleway on the western side of Gatwick Road that passes the school, leading from Fleming Way to the west. However, pupils would need to cross Gatwick Road to access the school. The proposed pedestrian crossing would assist in this regard.

- 5.76 In terms of cycle parking, for the 2015 application 20 spaces were proposed. This has now been increased to 60 spaces for the current application and are located at the front of the site, close to the entrances to the building.

### *Parking*

- 5.77 Parking standards are set out in the Urban Design SPD. For schools this relates to staff parking and it states that schools are to be assessed individually within the context of a travel plan using 1 space per 2 staff as a guide.
- 5.78 For this application, as well as the required provision for staff, (which has been examined above in paragraphs 5.56 -5.69), it is considered that provision on-site also needs to be made for parent parking, especially given the projected modal split, with a very low number of trips on foot, the relative remoteness of the school from pupils' homes and the lack of readily available on-street parking as surrounding streets are congested.
- 5.79 Following continued concerns raised about these issues and the number of car parking spaces, their layout and use, the provision and management of the car parking arrangements have been the subject of a number of revisions. The latest proposals have been simplified for the 2020/21 academic year and are included in the latest Car Park Management Plan dated December 2020.
- 5.80 The 69 car parking spaces proposed to the front of the site would include 26 spaces for staff and 4 spaces to accessible standard. The plans also show pedestrian routes through the school grounds to the pupil entrances into the buildings. Zones are identified where parking is permitted and where set down/pick up can and cannot take place along the access route at the relevant times.
- 5.81 In the morning all parents can use the managed 'kiss and drop' system, which is the in/out the route through the front car park. Cars enter by Tinsley Lane North through to Gatwick Road. This would accommodate 19 cars with one drop off every 1.5 minutes. The 19 car 'spaces' to be accommodated on the front access route for drop off in the morning has now been shown on the car park management plans. It is noted that 2 of these 'spaces' would be across the two pedestrian routes within the school grounds which would lead from the pavement in Tinsley Lane North and Gatwick Road to the paths to the main entrance doors and secondary school entrance doors of the building. No parent parking would be allowed in the morning in the remaining 39 spaces to the front of the site. These spaces would be coned off. Additionally, the rear of the site can be used for 16 vehicles to drop off in the morning by selected year groups as required.
- 5.82 In the afternoon, there would be no 'pick up' along the front access route but a permit system is operated for the front car park so that parents can park and wait in the 19 parent spaces with timings for the different year groups to reflect the staggered timetable. These permits specify the arrival and departure times and allow for a maximum stay of 7.5 minutes.
- 5.83 Overall across the site there would be 69 marked bays (of which 39 are for parents) and 35 vehicles could be accommodated for kiss and drop (19 to the front and 16 to the rear). Thus for parents there would be a maximum of 35 kiss and drop spaces in the morning, and 39 formal parking spaces in the afternoons.
- 5.84 The southern part of the site, which was the rear office car park, is to be remodelled and the area between the school and the sports hall and MUGA would now be a hard surfaced play area. Previously this part of the site was also proposed to be used as parking for parents of primary school children in the mornings and afternoons. 69 spaces formal spaces were to be provided for this purpose, with access/egress via one of the two revised access points off Wheatstone Close. Following concerns about the mix of parking and play areas, and as part of the general review of the

overall parking arrangements, this aspect has been removed from the scheme, albeit that it is to be used for drop off in the mornings, with the route accommodating 16 cars, but no formal spaces will be provided.

- 5.85 It has been now clarified that the current arrangements for parents collecting primary school children at the end of the school day is from the Primary School entrance, at the front of the site. The School has advised that *'pick up times are staggered and strictly controlled. Parents arrive at allotted times to pick up their children and then immediately exit the site, Parents are not permitted to park on site for extended periods of time'*. Previously the waiting area for parents was at the rear of the site and there was concern at the potential for conflict between pedestrians and cars, in this area.
- 5.86 For the 2015 application WSCC commented that even with the additional parking provision as then proposed, there would still be a shortfall in parking given the demand for car travel to the site. The parking surveys indicated that there was limited on-street parking availability and a number of these spaces are not conveniently located to the school or especially apparent to those parents requiring a short term space and would require parents and pupils to walk through part of the adjacent industrial estate. In addition, it was felt that parking demands may vary from day to day depending on the weather and the season, and more significantly when considering at that time the unknown travel habits of future pupils. There was little flexibility for on-street parking to meet any overflow demands. WSCC considered at that time that the parking demands and lack of on-street parking were a significant highway consideration with the potential for the operation of the school to result in obstructive or unsafe parking within the surrounding area including Gatwick Road despite the presence of no waiting at any time restrictions.
- 5.87 With the current application, given the recent revised car parking arrangements and the analysis of parking demands which is now based on data from existing pupils, WSCC consider that as there are staggered finish times for different year groups, the impact of car parking demands can be spread. The permit system will limit the number of parent cars using the car park at any one time. However, WSCC have also advised that account should be given to additional measures including before/after school clubs/care and the objectives of mode shift as set out in the Travel Plan, and have concluded that the potential impact on parking would not be considered severe.
- 5.88 The Pupil Travel Plan indicates that measures would be introduced to aim to change home to school travel patterns, reduce car travel, reduce congestion and improve road safety conditions and pupil safety within the school grounds. The Pupil Travel Plan and Car Park Management Plan include ongoing commitments to monitor parking demands and further action may be necessary if the aims are not realised.
- 5.89 The comments of WSCC are acknowledged and that no objection is raised as the impacts on parking are not considered to be severe. The overall aims of the Travel Plan and Car Park Management Plan documents are also noted. However, your officers have reservations that there is no additional capacity on site and there is little capacity in the surrounding streets to absorb any overflow demands. In addition, the full aspirations of the plans may not be achievable and difficult to introduce and implement in practice.
- 5.90 In these circumstances and given the restricted layout of the site and the character of the surrounding highway network, particularly in terms of volumes of traffic and lack of available on-street parking spaces, the car parking arrangements to service the high level of car use would need to be actively managed to ensure that they work effectively and safely, especially as there is no spare capacity either on-site or on-street.
- 5.91 The concerns about staff parking and the Staff Travel Plan have been set out in paragraphs 5.56 to 5.69 above.
- 5.92 With regard to parent parking, it is clear that the capacity of the car parks is reliant on a robust turnover for the use of the spaces, with precise dwell times set out. For the front area this requires the turnover for morning drop off in the access route to be maintained at 1 drop per 1½ minutes. This has been queried and the school has confirmed these figures and advised that this stems from the actual turnover surveyed in the morning at the existing site and that this is expected to be

maintained. They state that the use of the car parks will be actively managed to ensure the strategy is being followed.

- 5.93 In this regard the management scheme indicates that a significant number of staff, acting as marshals would be required to manage the use of the car parks. In the mornings the front car park would be supervised by 5 members of staff/volunteers and the rear by 2 staff. In the afternoon the front car park would be supervised by 3 members of staff. The management measures include ensuring that the precise turnover rates are maintained to ensure the efficient flow of vehicles, that pupils get out of the vehicles quickly, that parents park in the appropriate car park area for their children's ages, and not in the access or surrounding streets, cones and barriers are in place to define routes and removed afterwards, and aisles are kept free for circulation manoeuvres. All parents are to be made aware of the measures and the document states that parents will not be able to stay parked in the car park in excess of the time periods specified.
- 5.94 WSCC have commented that *'some aspects of the Car Park Management Plan are quite idealistic (for example the enforcing of the regular turnover of spaces) and in reality may not occur exactly as set out'*. The Car Park Management Plan *'also indicates a number of staff being required to manage the car park. Again, in reality, this may not always be possible.'*
- 5.95 With regard to the revised Car Park Management Plan WSCC Highways comment that *'this approach does rely on the school enforcing the permits and parents not turning up early. Previous versions of the car parking management plan have though included quite precise waiting times for parents during the PM pick up period. These times have been based on the observed waiting times and actual car park operation. The permit system effectively formalises the waiting times. The operation of the car park management plan would potentially need to be reviewed alongside the pupil travel plan to ensure it is operating appropriately'*.
- 5.96 It is considered that this high level of supervision and detailed measures are indicative of the problems that would be involved in managing such a high level of car demand on this restricted site in this densely developed area. The car parking arrangements should really be self-regulatory in terms of provision of the correct numbers of spaces to meet the demand and the associated layout for car and pedestrians. Any additional supervision required should be at a minimal level or provided on an occasional basis at times of very high demand. These intensive arrangements would be needed twice daily. However, it is appreciated that generally the operation of a car park is essentially a matter for the occupier of site, and the very detailed arrangements as set out in this application in terms of evolving modal choice, actual and projected flows to the site and the precise turnover of spaces, would appear to indicate that the numbers of parking spaces are sufficient, such that WSCC advise that the impact of the school use would be not be severe and so no longer recommend a refusal. The car park management plan can be secured by a condition.
- 5.97 Officers have been concerned that these arrangements, especially the timings for the turnover of the limited number of spaces (a maximum of 35 kiss and drop spaces in the morning, or 39 spaces parent spaces in the afternoons to serve a school of 1020 pupils), have such a small margin that if the school is not able to control the parking arrangements to the precise level of detail that they propose, then arising from the lack of spare capacity on the school site itself and in the surrounding streets and with the significant demand for parking, this could give rise to significant issues in the locality in terms of on street parking and the free flow of traffic, and ultimately an associated adverse impact on the operation of Manor Royal. This issue has been put to the school and they have been asked to clarify what mitigation measures could be brought into effect, particularly when all car parks are full and additional cars are arriving. The reply was that *'the management of the on-site parking will be such that marshals will keep the aisles free for circulation manoeuvres. Even in the case of the car parks being full, vehicles will be able to circulate in the car park and exit.'* The response is noted but it does not completely tackle the impact on the wider area from the flow of traffic to/from a full car park and where those parents would park if none are available on the site itself. This lack of capacity issue is unlike any other school in Crawley as there is not a readily available supply of safe and convenient parking spaces in the vicinity that could be used as an overflow measure or for 'park and stride'.
- 5.98 However, WSCC have concluded that they have no objections on highway grounds and it is acknowledged that the school has, over the time that it has been operating, introduced and revised

a number of specific and detailed measures to control and manage parking in response to ongoing CBC concerns over this issue, and which can be secured and controlled as part of the s106 legal agreement and conditions. In these circumstances, it is not considered that there is not much more that the school could be asked to do in this regard, given this location and the parking conditions in the locality and the scale of the school and its facilities at the level proposed. This issue must then be judged as part of the overall planning balance.

#### *Other traffic and parking measures*

- 5.99 The applicants have also suggested that parking restrictions be introduced in the vicinity of the site. This would comprise 'school keep clear' markings and double yellow lines at the Tinsley Lane North access point, double yellow lines at the access points on Wheatstone Close, with the northern access being widened to allow for 2 way flow and associated signage, and double yellow lines at the junction of Tinsley Lane North and Wheatstone Close, and at the junction of Tinsley Lane North and Cobham Way. This would result in the loss of 12 on-street spaces, although some existing parking occurs on corners where vehicles should not park and if these are included the actual number of the spaces lost would be 17. This would have to be the subject of separate procedures via a Traffic Regulation Order (TRO), which would need to follow its own statutory consultation procedures and is a function of WSCC as highway authority. The outcome of such a process is unknown at this stage and cannot be guaranteed. Also, whilst it could improve the environmental situation in terms of volumes of on-street parking and keeping accesses and junctions clear, it would not provide any specific on-street spaces or allocated capacity for school users. Indeed it would reduce the amount of on-street parking used by workers and visitors to the surrounding businesses and may well lead to objections to the TRO process.
- 5.100 If the school were to proceed with these measures then a provision within a s106 agreement would be required for the applicant to fund the process to cover the cost of advertising, making and implementing the traffic regulation order as appropriate.
- 5.101 To conclude on sustainability and highway safety/access/parking considerations, over the time that the school has been operating and especially during the course of the consideration of this application, there have been amendments and revisions, plus negotiations that have resolved , or improved a number of the issues that were identified. Whilst the concerns over the unsustainable location for a school are not able to be resolved by this application, these issues must be weighed against the wider benefits of the proposal. These include the improvements and amendments that have been secured, particularly in terms of parking arrangements and modal shift, as well as the provision of a significant number of school places and the relative weight to be assigned to these factors in the overall planning balance.

#### The operational needs of the development

- 5.102 The site has an area of 1.2 ha with the former offices having a building footprint of 6400 sqm with an existing 185 spaces for car parking. The previous employment (office) use of the land operated with these buildings, the associated access and car parking arrangements, which for an office use in this location was satisfactory.
- 5.103 The school's needs are different to the previous employment use and the characteristic of a good development is that it can satisfactorily incorporate and accommodate the operational needs of that particular user. In particular, schools have specific access and parking requirements for pupils, parents, staff and deliveries, as assessed above and additionally need to provide suitable outdoor space and provide for play and sports activities.
- 5.104 At the front of the site there is an existing small play area for the reception year classes. This application also proposes additional play and sports facilities. To the rear, part of the existing car parking area would be redeveloped to provide a MUGA and the erection of the new sports hall. The remainder would be a hard surfaced play area including courts. This area would also be used for kiss and drop off in the mornings. A small primary play area for years 1 and 2 is to be provided to the side between the building and the pavement along Wheatstone Close. Other than these play/sports provisions on site, the school would also continue to use the 3G facilities at Maidenbower on specific occasions (such as sports days) and K2 for primary swimming lessons.

- 5.105 In respect to the play facilities, the Design and Access statement outlines that the site has been assessed against the Department for Education/Education Funding Agency guidelines set out in 'Building Bulletin 103 - Area Guidelines for Mainstream Schools' (June 2014). This advises that *'in line with policies which seek to increase choice and opportunity in state funded education, these guidelines will not necessarily have to be met in every case and should always be applied flexibility in light of the particular circumstances.'*
- 5.106 In respect of the Gatwick School these guidelines for a gross site area for an all-through school for 1020 pupils would be from 4.4ha to 5.5ha, however without the soft play PE requirements of 3.5ha, the site range is 0.9ha to 2.0 ha. The applicants state that the site, having an area of 1.2ha is within that latter range, as soft PE requirements are to be provided off site.
- 5.107 The hard outdoor PE area recommended for a 1020 place all through school is 1530 sqm. The three hard playgrounds and MUGA totals 2759 sqm, which meets the guidelines.
- 5.108 These outdoor facilities comprise a protected play area for Reception classes and another for years 1 & 2. The school has advised that remaining primary pupils (years 3 – 6) and secondary pupils would use the rear of the site and the MUGA at break and lunch times. Break and lunch times would be staggered to accommodate different year groups and no PE lessons would take place on the MUGA during break times. Benches for informal social use would also be available in this rear area. In response to Officers queries about where these would be placed within this area as it also incorporates 2 hard courts and would allow kiss and drop off in the mornings, the school has replied that the benches would be moveable and therefore to allow the car park to operate when required.
- 5.109 With regard to the proposed play area for years 1 and 2, this is to be positioned between the side of the building and Wheatstone Close and is a long narrow piece of land, measuring 37 m long by 7.2m wide at its maximum, narrowing down to 3m wide. This part of the site is currently a sloped grassed bank with trees and the proposals would involve the raising of the land levels here to make a flat site with a 1.8m retaining wall and weldmesh fence. The increase in levels would mean that the top of the wall/fence would be some 3m above the existing pavement level. A hedge would be positioned between the wall/fence and the pavement. The existing trees would be removed and replanted elsewhere on the school site. The area would also have to accommodate an existing green utilities cabinet for gas equipment that is to be relocated.
- 5.110 The applicants also state that *'the lack of other informal external social spaces can be compensated by the fact that there are 2 main halls within the building which have multipurpose uses between their formal curriculum requirements, and can therefore be used for 'social forums' to supplement external play areas.'* Furthermore the applicant comments that *'it is not unusual for Free Schools to occupy buildings and sites which cannot comply with the full range of indoor and outdoor facilities under current government guidance without the aid of off-site facilities. ...the buildings, with the addition of the new sports hall, provide the full range of internal facilities required to a 1020 place all-through school and with the ability to have off-site soft PE, a range of external facilities can be provide to meet current guidelines'*.
- 5.111 These comments are noted, but the lack of informal outside play/permanent seating areas is of concern and the fact that some PE lessons would still need to be provided off-site, adds to the unsatisfactory nature of the scheme. It is a further indication of the mismatch between the scale of the development proposed and the physical site area and its characteristics. Whilst a sports hall is proposed, which would provide for some PE lessons, this would then take up space on the site that could either be set to outside play (formal or informal), or be landscaped grounds or to be retained as a hard surface to provide parking. In addition, the on-site facilities would still need to be supplemented by off- site arrangements, including the hiring of grass pitches for football and rugby.
- 5.112 The PE lessons that would take place off site would need to be serviced by coaches/minibuses to take the pupils to those locations. There is no specific on-site coach/bus provision proposals, such as a bus lane or designated bay, but the submitted details state that coaches would wait in the internal access road at the front of the site. This would need to occur outside of the start and end of the school day, as at those times the access and adjacent parking spaces would be in full use by

parents dropping off and collecting their children. All timing arrangements would therefore need to be precisely organised as there is no scope to park in the nearby streets without obstruction of the carriageway.

- 5.113 The Recycling and Refuse officer has commented on the collection arrangements which show the refuse vehicle at the front of the building. There is concern that this is too far from the bin store building and the applicant has been asked whether this can be relocated or access is made available to the rear of the site. These requirements can be secured by a condition.
- 5.114 Whilst the scale of the development has not been reduced from the original proposals and there is concern about the scope of the site to satisfactorily accommodate all the various facilities in a suitable manner, it is acknowledged that overall the amount of PE and play facilities would meet the guidelines and this concern has to be set against the wider benefits of the provision of school places that arise from this application.

#### Design/appearance of the alterations and new works

- 5.115 The external alterations to the property comprise new windows and glazing together with recladding of the walls. The proposed materials would be polyester powder coated (ppc) aluminium insulated panels with continuous ppc aluminium ribbon window units. The Design and Access Statement advises that the Free School's vision is for the building to have a 'Business and Enterprise' aesthetic, as opposed to a more traditional school building appearance. The cladding panels would match the school's 'Branding Colours' which are three grades of blue/grey.
- 5.116 At roof level, the originally sloped glazed parapet panels are to be replaced with a coloured roof membrane to provide a termination to the roof line. The entrances to the former offices would become pupil entrances for the primary and secondary age groups and would utilise full height glazed curtain walling.
- 5.117 The main entrance to the school would be located in a central position on the front elevation, in the interconnecting building between the 2 main buildings. The existing solid panels would be removed and replaced with full height glazing to the north (front) elevation and a combination of glazing and panels to the south façade. At the front a staircase is also to be relocated to give ease of access to the first floor facilities from reception and a curved screen of semi-opaque polycarbonate will wrap around this with the school name and logo applied to highlight that this central section of the building is the main entrance.
- 5.118 A new sports hall building on the site is proposed to be situated to the rear, in the existing car park area, adjacent to the southern boundary with the commercial properties in Sterling Park. The design is revised from the previous application when it had an exposed structure and now the form would follow that of the existing buildings with the same coloured panels to match the main school building, but with a curved roof structure. It would provide courts, 2 stores and a lobby, all at ground floor level. Changing facilities would be in the main building.
- 5.119 It is considered that the visual appearance of the scheme is acceptable, and would provide an improvement over that of the current condition of the building.

#### Quality of the environment for the school – noise and air quality

- 5.120 The site lies in an existing industrial/commercial area, which is subject to noise from surrounding uses, the existing roads and aircraft from Gatwick Airport. The predicted 66dB contour for a potential future southern runway runs along the southern boundary of the site and the predicted 69dB contour runs just north of Tinsley Lane on the northern boundary of the site. The eastern end of the proposed southern runway would terminate on what is now James Watt Way, which is only about 350m to the north of this site. The contours are the published contours by the CAA (ERCD0308) and are the accepted contours for the proposed wide-spaced southern runway. Even though the proposed runway has not been agreed, it has been accepted by the Planning Inspectorate in recent appeal decisions to assume it is likely to go ahead when considering sound insulation for new noise sensitive premises and policy ENV11 applies. This position has been endorsed by GAL Planning.

- 5.121 It should be noted that in considering the Forge Wood development, the school element of that neighbourhood was considered acceptable. That location was within a lower noise contour and the scheme is subject to safeguards and specific design features to provide for a suitable noise environment for the pupils. It is considered that for consistency the same approach should be followed with this scheme and that, due to the noise environment, suitable noise mitigation measures are required.
- 5.122 This issue has been the subject of lengthy debate between officers and GAL and with the school. The current position is that the school is now offering to install various measures including insulation to the walls and roofs to mitigate against current road and future aircraft noise. The details of this can be secured by condition / S106.
- 5.123 The Environmental Health Officer has assessed the latest noise reports and comments as follows: *“The reference levels for the teaching areas for schools are set down in the Acoustic Design of Schools: performance standards (Building Bulletin 93). As to be expected in this location the predicted noise levels are very high and the report splits the buildings into three zones, coloured depending on the level of insulation required to deal with the levels of noise. It should be noted that the buildings are all air-conditioned which will deal with the effects of summer warming and therefore openable windows are not required. Appendix E from the report show the calculations that the proposed sound reduction of the recommended façade and roof refurbishment will achieve the internal noise levels specified in BB93, including the proposed sports hall and I accept those calculations.”*
- 5.124 He recommends that the insulation details supplied in the Hoare Lee Noise Report – Revision 1 (17.05.2019) are implemented in full. Also a post completion condition should be included to ensure the works are completed satisfactorily.
- 5.125 He also comments that about the MUGA adjacent to the sports hall. He states that this will be unprotected and will experience high levels of noise (70dB LAeq, 30min.) from the proposed wide-spaced southern runway at Gatwick. The levels of noise experienced would dramatically interfere with any team games due to the inability to communicate effectively. Players would be unable to hear other team members and also the referee. He recommends that the external MUGA should only be used until such time that the wide-spaced southern runway has become operational. Thereafter an alternative sports field facility should be used or the existing facility adequately enclosed.
- 5.126 However, whilst the previous version of BB93 stated that playgrounds, sports fields and other outdoor areas should not exceed 55dB LAeq, 30min., it should be noted that the latest revision of BB93 no longer includes a noise standard for such facilities. In these circumstances, it is not considered reasonable to impose such a restriction.
- 5.127 In terms of air quality the assessment found that the existing or predicted levels were within air quality objectives from road traffic sources, or VOCs. Measures are recommended to mitigate the impact of dust during the construction phase. The approval of the school on a permanent basis would introduce a sensitive use into an employment area, which could impact on new businesses in the future. These aspects would be controlled under other legislation.

#### Future uses of the site and impact on economic role and function of Manor Royal

- 5.128 Development Plan policies whilst allowing for changes away from B class uses in Manor Royal in appropriate circumstances, seek to ensure that future uses and development of sites and the wider area in the longer term is not prejudiced by any current proposals.
- 5.129 In this regard there has been concern that the proposals not only include a change of use of the building, but also that there is a large element of new build. The erection of the sports hall building would take up land currently laid out as a car park, which would affect any potential future reuse of the building for office or other B1 purposes, as the level of car parking would be significantly reduced.

- 5.130 At the time of the refused application in 2015 it was also considered that the issues arising from the scale of the proposal and the associated traffic and parking demand with limited on-site parking provision would have unsatisfactory knock-on effects in the wider area, in terms of traffic congestion at peak periods and exacerbating the already difficult on-street parking situation, in a locality which is already at capacity. There was concern that this would lead to an adverse impact on the economic role and function of Manor Royal as a Main Employment Area and the wider economic function of Crawley. Whilst uses other than B class uses are allowed for by the policies, they need to be of a scale and function that enhances this established role and must not undermine the business district.
- 5.131 Whilst these concerns remain, at the time of writing this report there is little evidence to suggest that there is a significant problem in Manor Royal arising from the operation of the school. There have been a number of planning consultations and planning site notices displayed over this time that the school has been open and it is noted that no objections from local businesses have been received.
- 5.132 The agent acting for the applicant has commented that the school provides employment, and there are benefits from having a school within Manor Royal, including links with businesses and the provision of facilities that can be used by the wider community. Reference is also made to the recent changes to planning legislation which allows for a more flexible use of commercial premises. They are of the view that there is therefore a clear intent within Government for existing office stock to be used for a wide range of alternative purposes. They consider that this application for the school application should be viewed in this context of recent Government announcements to enable greater flexibility in the types of uses and their permitted locations.
- 5.133 It is considered that these arguments put forward by the applicant do have some merit and in the specific circumstances whereby the school has been in operation since 2015, officers are of the view that these concerns are no longer such that they could currently justify a reason for refusal. As such the scheme is not considered to be contrary to Local Plan policies EC1, EC2 and EC3 in this regard.

#### Impact on trees and landscaping

- 5.134 There are 8 oak and 4 sweet chestnut trees at the front of the site along the boundary with Tinsley Lane North and Gatwick Road that are the subject of a Tree Preservation Order. There are other trees and shrubs around the boundaries of the site
- 5.135 Two pedestrian access points are to be created from the site frontage to lead to dedicated pedestrian access routes to the main entrance and the secondary school entrance. This would be across areas of existing landscaping however the preserved oak trees would be unaffected as tree protection measures including no dig construction methods are proposed in the application submission. Some areas of hedging and shrub planting will need to be removed to facilitate these routes, but this is considered to be acceptable and additional shrub and ground cover planting is proposed as part of the overall landscaping proposals. The four preserved sweet chestnut trees along the frontage are to be removed to facilitate the provision of additional parking spaces. Whilst the loss of this group of trees is unfortunate, two semi- mature individual tree specimens are to be planted as a replacements.
- 5.136 A number of other trees around the site would also need to be removed to facilitate the development. Overall 17 specimens would be lost across the site, including a group of 9 fruit (pear) trees to the rear of the site. In accordance with policy CH6 and the Green Infrastructure SPD, this would lead to a requirement for 37 replacement trees. The full details of the replacements to be provided on the site would be specified in the landscaping scheme and the remainder can be secured by an appropriate contribution towards off- site planting. The s106 agreement can include the formula to cover this aspect.
- 5.137 Other trees along the eastern boundary with Wheatstone Close are to be relocated as currently they are positioned where the proposed play area for years 1 and 2 is to be provided.

- 5.138 The Arboricultural Officer has considered the proposals including the tree protection measures, tree replacements and relocations and has no objections to the scheme, subject to a condition that the development is carried out in accordance with the Tree Protection Plan & Landscaping Plan.

#### Energy efficiency and environmental sustainability

- 5.139 Local Plan Policies ENV6, ENV7 and ENV9 are relevant to this application from the perspective of environmental sustainability
- 5.140 Policy ENV6 requires applications involving the creation, change of use, or refurbishment of over 'sustainability objectives' detailed in the policy. In addition the policy requires proposals for new non-domestic buildings to achieve the minimum standards for BREEAM 'excellent' within the water and energy issue categories.
- 5.141 Policy ENV7 requires applications for major development to detail within their Sustainability Statement their consideration of, and response to, of a range of options for communal or decentralised energy which are set out in the policy. Where the development does not propose to incorporate any of these options this should be justified on a case-by-case basis, and alternative means of achieving an advanced level of performance in terms of carbon/energy efficiency should be incorporated.
- 5.142 Policy ENV9 requires that non-residential development should, where feasible and viable, achieve the minimum standards for BREEAM 'excellent' within the water issue category.
- 5.143 One issue relevant to the proposal is the application of the BREEAM requirements set out in policies ENV6 and ENV9 and how the development and in particular the proposed sports hall is assessed in relation to the requirement for 'new buildings' to meet specified BREEAM standards. It is appreciated that this is complex in this case: the proposed development is a school which will consist partly of existing refurbished and partly of new buildings. Moreover the 'sports hall' function will effectively be split between the existing and the new building, with changing/washing facilities being provided in the existing building, while an indoor sports hall and equipment storage are supplied by the new structure, which will it seems be heated but have no water supply.
- 5.144 The Energy and Sustainability officer comments that the submitted energy document indicates that the proposed building performs well in terms of reducing heating and cooling demand over and above Building Regulations, achieving a percentage improvement of 41.2%. On the other hand improvements over Building Regulations requirements in terms of primary energy consumption and CO<sub>2</sub> emissions are negligible (1% and 4%). These specific areas of lower performance could be addressed if the scheme was able to incorporate some form of low or zero carbon energy source (e.g. solar PV) and it is recommended that a bespoke condition is applied seeking further assurance that potential for the use of low/zero carbon technology has been fully explored, and that any measures which are feasible and viable have been incorporated into the design of the new build sports hall.
- 5.145 Given that the changing/washing facilities for the new sports hall are shown to be installed in the existing school building, the relevant BREEAM requirement in respect of water efficiency arising from Policy ENV9 can be applied by addition of an appropriate condition and informative.
- 5.146 In terms of decentralised energy, this issue is separate from the question of the BREEAM requirements, and reflects the scale of the proposed development as well as its presence within an identified priority area for the delivery of a District Heat Network. Para. 6.37 of the submitted Planning Statement states that the site can be 'network ready' for the purposes of policy ENV7, and that given there is currently no district heat network in place in the locality this approach is supported and a condition is recommended.

#### Contaminated Land

- 5.147 The Contaminated Land officer comments that due to the industrial history of the site and its surrounding area, a condition is required to deal with the contamination of the land and/or ground water. This would require a detailed site investigation, a remediation statement and post remediation verification testing and report.

## Drainage

- 5.148 The application has been accompanied by a Flood Risk Assessment and Drainage Strategy. The site falls in flood zone 1, which is land at low risk of flooding, although there are known instances of flooding in the car park and local area. The development proposals are to refurbish the two former office block internally and externally, plus alterations to the outside areas to form hard surface play areas, the construction of the sports hall and remodelling of the car park areas.
- 5.149 It is proposed to continue the discharge of surface water runoff to the existing public surface water sewer but with the refurbishment of the existing surface water network within the site and the use of below ground SuDS. Thus all runoff would be managed below ground in pipework and attenuation tanks. Three tanks would be placed beneath the car park areas - two to the front and one to the rear of the site. This would enable runoff to be contained within the site boundary and so surface water would not flow to surrounding highways or neighbouring properties.
- 5.150 Drainage maintenance and management is to be the responsibility of the school's management team and a SuDS maintenance and inspection schedule has been submitted as part of the drainage details.
- 5.151 The Drainage Officer is of the view that this approach is well considered and has no objections.

## Manor Royal Contribution

- 5.152 Any net additional floorspace associated with an application is liable to the Manor Royal S106 contribution, which is used towards public realm improvements in the business district. This is charged at a rate of £2 per square metre of floorspace, subject to identification of one or more appropriate projects. In this case the additional floorspace is 989 sqm and comprises the erection of an extension to house a new staircase and the erection of the sports hall building.

## S106 requirements

- 5.153 Policy IN1 requires infrastructure contributions/provision to meet and address the justifiable needs created by new development and to mitigate any significant effects arising from the development. In this case a s106 Agreement would be required in order to secure the following items:
- Pedestrian crossing on Gatwick Road
  - Traffic markings outside entrances and in vicinity of the site
  - Wheatstone Close access works
  - Fleming Road roundabout - monitoring and bus lane works
  - Bus subsidy - £ 28,000 pa for 3 years
  - Travel Plans – pupils and staff - including securing of offsite staff parking at The Greyhound Pub and Copthorne Golf Club; and the operation of the staggered timetable
  - Noise mitigation works including installation of noise insulation
  - Community use of the school and sports facilities outside of school hours
  - Tree contribution
  - Manor Royal Contribution - £1978

## CONCLUSIONS:-

- 6.1 Development Plan policies support the provision of new educational facilities and there is a need for additional school places in the town. National policy also has a strong presumption in favour of free schools. However, such provision needs to be in the right place, in a sustainable location and the scale and level of use of the proposal needs to be satisfactory and relate to the character of its surroundings and address the policies of the Development Plan.
- 6.2 Given the previous refusal in 2015, it is also necessary to examine whether any revisions to the application have been made or if any change in circumstances are such that those refusal reasons have been addressed or no longer apply. In addition, the benefits of a significant number of school places are a material consideration that has to be assigned appropriate weight in the overall planning balance of the various issues.

- 6.3 In this case, in terms of issues that have not changed or not been addressed, officers consider that it is the scale of the school in this location remains a concern. The site is within Manor Royal, which is a main employment area, and not a residential neighbourhood. It is a location where employment/business uses are encouraged. Other uses may be acceptable in such areas, provided they do not have an adverse impact on the economic function of that area. The concerns about this being an unsustainable location for a school of this scale remain.
- 6.4 The overall scale of the proposal has not fundamentally changed as it is still for an all-through establishment of 1020 pupils, with the conversion of all the buildings and the erection of a sports hall. Whilst the traffic data and modelling has been updated and a limited reduction in car travel has been achieved, it is still the case that the scheme would generate a significant level of traffic from pupils and staff travelling to and from the site and given its location in a commercial area, the majority of these would be car borne, which conflicts with the principles of sustainable development. The locality experiences high levels of traffic on the surrounding road network and there is high parking demand in the locality from existing users and occupiers, with very little capacity to absorb additional on-street parking from staff or parents. The school drop off and collection arrangements are highly dependent on a complex parking regime requiring intense day to day management by the school. The continued concerns over staff parking have been addressed to a certain extent, with the use of additional parking facilities elsewhere in the locality.
- 6.5 However, these negative aspects have to be balanced against the positive benefits of the proposal and the amendments to the scheme that have been achieved through the continued and extensive negotiations that have taken place between officers and the school and their agents.
- 6.6 In this regard the provision of school places in the borough is a significant factor and full regard has to be given to the Government policy set out in the NPPF and the DCLG Policy Statement which requires significant weight to be given to the establishment and development of state funded schools.
- 6.7 A further consideration is that the school is currently operating and the implications for existing pupils and those due to attend the school in the future has to be taken into account, should the application be refused, especially given the limited options for other pupil places to be provided at alternative locations.
- 6.8 An added benefit is the reuse of a vacant building and the associated jobs that the school use brings to the locality, plus the links to the business community that have been created and the potential for dual (community) use of the school and sports facilities.
- 6.9 In addition, during the course of the application, the proposals have been refined and a number of amendments have been realised to address or mitigate previous concerns. These include revisions to the access and parking arrangements, updated and more robust travel plans for both pupils and staff, such that the modal split since the school began operating has improved with increases in walking and use of public transport. In addition, a more detailed car park management plan has been developed to address concerns about the operation of the car park and which reflects the revised school timetable introduced in autumn 2019. Furthermore, additional staff parking facilities in the vicinity of the site are now being provided.
- 6.10 As well as conditions to control various aspects of the development the s106 agreement would secure a number of essential mitigation elements including highway improvements, in particular a pedestrian crossing on Gatwick Road; a contribution would go towards an additional bus service; the community use of the facilities including the sports hall and MUGA and finally; the mitigation works for road and aircraft noise.
- 6.11 Whilst there are aspects of this scheme that have not been resolved, including the conflict with the principles of sustainable development, it is necessary to weigh the social, environmental and economic impact and benefits of the proposal to come to a conclusion of this planning application. Overall and most importantly the proposal would provide for a significant number of school places. It is thus considered on balance that the benefits of the scheme outweigh the adverse impacts identified in this report.

6.12 It is therefore recommended that the scheme is granted planning permission subject to conditions and the completion of the s106 legal agreement.

**RECOMMENDATION RE: CR/2018/0172/FUL**

**PERMIT** – subject to the completion of a section 106 agreement to secure the elements set out in paragraph 5.153 of this report and the following conditions:

1. The development hereby permitted shall be begun before the expiration of 3 years from the date of this permission.  
REASON: To comply with Section 91 of the Town & Country Planning Act 1990.
2. The development hereby permitted shall not be carried out other than in accordance with the approved plans as listed below save as varied by the conditions hereafter:  
(Drawing numbers to be added)  
REASON: For the avoidance of doubt and in the interests of proper planning.
3. The school hereby permitted shall operate with a maximum number 1020 pupils, comprising 420 primary pupils and 600 secondary pupils, as set out in the application.  
REASON: To control the operation of the school in the interests of sustainable development, highway safety, the character and function of Manor Royal as a main employment area, and to provide for a suitable level of development for the site, in accordance with policies SD1, CH3, EC1, EC3 and IN4 of the Crawley Borough Local Plan 2015 - 2030.
4. No above ground development shall be carried out until a schedule of materials has been submitted to, and where so required by the Local Planning Authority sample panels of the external finishes have been constructed on the site, and approved by the Local Planning Authority. The development shall be implemented in accordance with the agreed details.  
REASON: To enable the Local Planning Authority to control the development in detail in the interests of amenity in accordance with Policy CH3 of the Crawley Borough Local Plan 2015-2030.
5. No development approved by this permission shall commence until a scheme to deal with the contamination of the land and/or ground water has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include all the following measures, unless the LPA dispenses with any such requirement specifically and in writing:
  1. A Desk Study (including Conceptual Model of potential pollutant linkages) carried out by a competent person. The study shall detail the history of the site uses and identify and evaluate all potential sources and impacts of land and/or groundwater contamination relevant to the site. Two full copies of the desk-top study and the non-technical summary shall be submitted to the LPA,

and the following stages where required:

2. A Detailed Site Investigation. This shall be carried out by a suitably qualified and accredited consultant/contractor in accordance with a Quality Assured sampling and analysis methodology BS 10175:2011. The site investigation should fully and effectively characterise the nature and extent of any land and/or groundwater contamination and its implications, including an assessment of risk to any potential receptors. A full report on the findings of the site investigation shall be submitted to the LPA.

3. Remediation. A written remediation statement, detailing the works necessary so as to render harmless the identified contamination given the proposed end use of the site and surrounding environment, including any controlled waters, shall be submitted to the LPA and agreed in writing with the LPA prior to any remediation commencing on site. Two copies of the remediation report shall be submitted to the LPA.

4. Post Remediation Verification Testing and Report. The approved remediation works shall be carried out in full on site, under a quality assured scheme to demonstrate compliance with the proposed methodology and best practice guidance. If during the remediation works contamination is

encountered that had not previously been identified then the additional contamination shall be fully assessed and an appropriate remediation scheme agreed with the LPA in accordance with the process laid out at points 1 – 3 above.

5. Upon completion of the remediation works, this condition shall not be discharged until a further validation report has been submitted to, and approved by the LPA. The validation report shall include quality assurance certificates to show that the works have been carried out in accordance with the approved methodology. Details of any post remedial sampling and analysis to show the site has reached the required clean-up criteria shall be included in the validation report together with the necessary documentation detailing what waste materials have been removed from the site.

The development shall not commence until the measures approved in the scheme have been implemented.

REASON: To safeguard occupiers of the site in accordance with Policy ENV10 of the Crawley Borough Local Plan 2015 - 2030.

6. No development shall take place, including any works of demolition, until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the approved Plan shall be implemented and adhered to throughout the entire construction period. The Plan shall provide details as appropriate but not necessarily be restricted to the following matters:-

- the anticipated number, frequency and types of vehicles used during construction,
- the method of access and routing of vehicles during construction,
- details of the area(s) subject to construction activity,
- details of cranes and other tall construction equipment (including details of obstacle lighting)
- the parking of vehicles by site operatives and visitors,
- the loading and unloading of plant, materials and waste,
- the height and areas for the storage of plant, equipment and materials used in construction of the development,
- details of temporary lighting
- the erection and maintenance of security hoarding,
- the provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders),
- details of public engagement both prior to and during construction works.
- details of a dust and smoke management plan
- control and disposal of putrescible waste to prevent attraction of birds
- site restoration
- protection and mitigation measures for wildlife and habitat

REASON: In the interests of highway safety, the amenities of the area, to ensure that the development does not endanger the safe movements of aircraft or the operation of Gatwick Airport through interference with communication, navigational aids & surveillance equipment and to accord with Policies CH3 and IN1 of the Crawley Borough Local Plan 2015-2030.

7. No on-site preparation works or development related to this planning permission shall take place until the approved details as set out on the Tree Retention and Protection Plan LLD1253-ARB-D02 rev 05 including the tree protection measures have been implemented in full. The development shall be implemented in accordance with the approved details and the tree protection measures shall thereafter be retained in accordance with the approved details throughout the construction period until the development is completed.

REASON: To ensure the retention and maintenance of trees important to the visual amenity and the environment of the development in accordance with Policy CH3 of Crawley Borough Local Plan 2015-2030 and the Green Infrastructure Supplementary Planning Document.

8. No above ground development shall take place unless and until there has been submitted to and approved by the Local Planning Authority a scheme of hard and soft landscaping, which shall include indications of all existing trees and hedgerows on the land and details of any to be retained, together with measures for their protection in the course of development; details of new specimens to be planted and details of the boundary treatments. The scheme shall be implemented in accordance with the approved details.

REASON: In the interests of amenity and of the environment of the development in accordance with Policy CH3 of the Crawley Borough Local Plan 2015 - 2030.

9. All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding seasons following the occupation of the buildings or the completion of the development, whichever is the sooner, and any trees or plants which within a period of five years from the completion of the development die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species, unless the Local Planning Authority gives written consent to any variation.  
REASON: In the interests of amenity and of the environment of the development in accordance with Policy CH3 of the Crawley Borough Local Plan 2015 - 2030.
10. The development hereby permitted shall be implemented in accordance with the drainage scheme details submitted with the application including the use of below ground SuDS comprising surface water attenuation tanks. The implemented drainage scheme shall be thereafter retained to serve the development and shall be inspected, maintained and managed in accordance with the submitted details.  
REASON: To ensure the site is satisfactorily drained and to reduce the risk of flooding elsewhere in accordance with Policy ENV8 of the Crawley Borough Local Plan 2015 - 2030.
11. Prior to the full occupation of the school, the vehicle parking and turning spaces shall be constructed and provided in accordance with the approved plans. These spaces shall thereafter only be used and retained for their designated use.  
REASON: To provide adequate on-site parking and turning space for the development in accordance with Policies CH3 and IN4 of the Crawley Borough Local Plan 2015-2030.
12. Prior to the full occupation of the school, cycle parking facilities shall be provided in accordance with details that have been submitted to and approved by the Local Planning Authority. These facilities shall thereafter be retained for their designated use.  
REASON: To provide alternative travel options to the use of the car in accordance with policies CH3 and IN4 of the Crawley Borough Local Plan 2015 – 2030.
13. The provisions of the Car Park Management Plan (December 2020) shall be implemented and operated as approved for the lifetime of the development, unless otherwise agreed in writing by the Local Planning Authority.  
REASON: To ensure the safe operation of the car park and in the interests of highway safety, in accordance with policies CH3 and IN4 of the Crawley Borough Local Plan 2015 - 2030
14. Prior to the full occupation of the school, the proposed external play areas as shown on the Landscape Masterplan drawing number LLD1253-LAN-DWG-010 rev 09 shall be implemented, surfaced and fenced in accordance with details to be submitted to and approved by the Local Planning Authority. The facilities shall be thereafter retained and used for this purpose.  
REASON: To meet the operational needs of the school, to provide a suitable layout, to ensure the site is suitably drained and in the interests of visual amenity, in accordance with policies CH3 and IN4 of the Crawley Borough Local Plan 2015 - 2030
15. Prior to the full occupation of the school the facilities for refuse and recycling bin storage and the access and collection arrangements shall be provided in accordance with plans and details that have been submitted to and approved by the Local Planning Authority. The facilities shall subsequently be maintained and be retained to serve the development  
REASON: To ensure the operational requirements of the site are met in accordance with Policy CH3 of the Crawley Borough Local Plan 2015-2030.
16. The sports hall shall not be brought into use until there has been submitted to and approved in writing by the Local Planning Authority a report assessing the technical, environmental and economic feasibility of using high-efficiency alternative energy systems in the construction of the building, and outlining how the development has incorporated any appropriate technologies. The development shall be implemented in accordance with the approved details.  
REASON: In the interests of environmental sustainability, in accordance with policy ENV6 of Crawley Borough Local Plan 2015-2030.

17. Prior to the installation of new showers, sinks, toilets and other water consuming components within the development, details of their water consumption levels shall be submitted to and approved in writing by the Local Planning Authority. The components shall subsequently be installed in accordance with the approved details.

REASON: To help address water stress in Crawley in the interests of sustainability and in accordance with policies ENV6 and ENV9 of the Crawley Borough Local Plan 2015-2030.

18. No development shall take place unless and until details of the provisions to be made within the scheme design to enable the development to be 'network ready' in the event that a District Energy Network is delivered in the vicinity have been submitted to and agreed in writing by the Local Planning Authority. The development shall thereafter be implemented in accordance with the approved details unless otherwise agreed in writing by the Local Planning Authority.

REASON: In the interests of climate change mitigation in accordance with policy ENV7 of the Crawley Borough Local Plan 2015-2030.

#### INFORMATIVE(S)

1. Given the nature of the proposed development it is possible that a crane may be required during its construction. The applicant's attention is drawn to the requirements of the British Standard Code of Practice of the safe use of cranes, for crane operators to consult the aerodrome before erecting a crane in close proximity to an aerodrome. Gatwick Airport requires a minimum of four weeks' notice. For crane queries/applications please email [gal.safeguarding@gatwickairport.com](mailto:gal.safeguarding@gatwickairport.com). The crane process is explained further in Advice Note 4 'Cranes and Other Construction Issues' available at [www.aoa.org.uk/policy-campaigns/operations-safety/](http://www.aoa.org.uk/policy-campaigns/operations-safety/)
2. Within the boundaries of Crawley Borough Council the Control of Pollution Act 1974 is used to control noise from construction sites. Section 60 of the Act permits Local Authorities to specify the hours the noisy works are permitted.

The permitted hours for noisy construction work in the borough of Crawley are as follows:

0800 to 1800 Monday to Friday and

0800 to 1300 on Saturday.

With no noisy construction works taking place on Sundays, Bank Holidays, Public Holidays, Christmas Day, Boxing Day or New Years' Day.

The developer shall employ at all times the best practical means to minimise noise disturbance to nearby residents. All construction work practises shall comply with B.S. 5228 1:2009 'Code of practice for noise and vibration control on construction and open sites'.

Any exemptions to the above hours must be agreed with The Environmental Health Team in advance.

3. The report required by condition 16 of this consent may, for the purpose of assessing alternative energy systems, incorporate the analysis which is required to be carried out by Regulation 25A of Part L of the Building Regulations.
4. The applicant is advised that the Local Planning Authority considers that the details submitted to comply with condition 17 of this consent should, where feasible, demonstrate that the water consumption levels of new components fitted within the building should achieve the performance levels under column 3 of the following table:  
[http://www.breeam.com/ndrefurb2014manual/content/08\\_water/wat01\\_rfrb.htm#Water\\_efficient\\_consumption\\_levels\\_by\\_component\\_type](http://www.breeam.com/ndrefurb2014manual/content/08_water/wat01_rfrb.htm#Water_efficient_consumption_levels_by_component_type)

#### 1. NPPF Statement

In determining this planning application, the Local Planning Authority assessed the proposal against all material considerations and has worked with the applicant in a positive and proactive manner based on seeking solutions where possible and required, by:

- Providing advice in a timely and manner through pre-application discussions/correspondence.

- Liaising with consultees/applicant/agent and discussing the proposal where considered appropriate and necessary in a timely manner during the course of the determination of the application.
- Seeking amended plans/additional information to address identified issues during the course of the application.

This decision has been taken in accordance with the requirement in the National Planning Policy Framework, as set out in article 35, of the Town and Country Planning (Development Management Procedure) Order 2015.



# ArcGIS Web Map

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