



## Perranporth Community Primary School

Liskey Hill, Perranporth, Cornwall, TR6 0EU

### Planning Statement

Job Number: 31016  
Latest Revision: P01  
Issue Date: 22/12/2020

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## 1. Introduction

- 1.1. This Planning Statement (statement) has been prepared by Bailey Partnership's Chartered Town Planning service on behalf of Truro and Penwith Academy Trust (the applicant) in support of a full planning application for:

*“Removal of derelict outdoor swimming pool, formation of new remote teaching block and main entrance infill extension, provision of new playground area, multi-use games area, and associated supportive parking to facilitate school expansion.”*

- 1.2. This statement provides a description of the site and proposed development and an analysis of the main planning considerations raised by the proposals. It contains reference to both local and national planning policy and provides an overall assessment of the proposal.

## 2. Site Location and Description of Development

- 2.1. The site is known as “Perranporth Community Primary School, Liskey Hill, Perranporth, Cornwall, TR6 0EU”.
- 2.2. The site is located within Perranporth Community Primary School. Located on the south eastern side of Perranporth. The site is approximately 500m from the town centre. Perranporth itself is situated on the North coast of Cornwall.
- 2.3. The Perranporth CP School is situated within a residential area. Immediately to the West of the school is Liskey Hill, one of the main routes into Perranporth.
- 2.4. The site falls within Flood Zone 1, the area at least risk of flooding.
- 2.5. The site does is not restricted by any ‘Footnote 6<sup>1</sup>’ policies.
- 2.6. The existing primary vehicular access is currently from Parc Hendrawana.

### **Proposals**

- 2.7. This application seeks full planning permission to allow the facilities at the primary school to be better adapted to their changing needs. The proposals seek to:
  - Make better use of the derelict outdoor swimming pool and outbuildings by removing them and replacing with a playground.
  - Build a single-storey block as teaching accommodation linked by a canopy to the main buildings on the existing playground, together with an extension to the entrance of the school to facilitate an additional 0.5FE (105 pupils) and associated supporting staff.
  - Create additional car parking to the West of the site with a new entrance from Liskey Hill to provide a staff parking area, with cycle storage. Works to the existing parking on the North part of the site to provide more standardised layout parking bays to prevent access obstructions.
  - Create a multi-use games area on the site of the existing tennis courts
  - Create a mini-soccer pitch on the site of the existing playing field.
  - Ensure the site is secure with adequate fencing

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<sup>1</sup> “The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 176) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 63); and areas at risk of flooding or coastal change.” (Footnote 6, the Framework)

### ***Phasing of Development***

- 2.8. The proposals are likely to come forward in 2 phases. An indicative phasing plan is included as part of the planning submission and this sets out the works currently planned to be undertaken in each phase.
- 2.9. Phase 1 works include:
- Construction of new infill extension for the reception area and associated internal works;
  - Infill of swimming pool and partial demolition of surrounding structures; to be temporarily reinstated as grassed informal play area;
  - New perimeter fence along northeast edge;
  - Forming of new steps, and acoustic fire partition within hall;
  - Forming of new double door on south elevation.
- 2.10. Phase 2 works include:
- Forming new building and canopy link;
  - Back of the hall internal works between classrooms + infant wc;
  - Old pool resurfaced as a playground;
  - MUGA built;
  - Car park works.
- 2.11. Accordingly, the applicant wishes to stress the importance of dialogue with the Council in respect of determining the triggers for any potential planning conditions. This will ensure that Phase 1 can be realised and those works implemented without requiring a formal discharge of conditions application.

### 3. Relevant Planning

- 3.1. In this instance the most relevant applications are:
- 3.2. **PA14/09796** for Enlargement of existing swimming pool, demolition of existing ancillary buildings and construction of new building to house pool for community, including solar panels to roof was approved with conditions in December 2014 - these works were not undertaken.
- 3.3. **C1/CC21/0142/09/G** for Construction of new single storey children's centre and associated works in February 2009
- 3.4. **C1/PA21/0136/07/G** for Extend existing school to provide a preschool classroom and divisible community room, new public entrance and reception in February 2007
- 3.5. **C1/PA21/1906/06/G** for Extending existing school to provide preschool classroom and divisible community room, new public entrance and reception sites in November 2006

#### 4. The Adopted Development Plan (DP)

- 4.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the provisions of the Development Plan (DP) unless material considerations indicate otherwise. In this instance the Cornwall Local Plan Strategic Policies 2010-2030 (adopted November 2016) (CLP) provides the adopted DP.
- 4.2. The relevant DP policies are as follows:
- Policy 1: Presumption in favour of sustainable development
  - Policy 3: Role and function of places
  - Policy 4: Shopping, services and community facilities
  - Policy 12: Design
  - Policy 13: Development Standards
  - Policy 27: Transport and Accessibility
- 4.3. The above policies are addressed in Section 7 below.
- 4.4. Perranporth was designated as a Neighbourhood Plan Area in November 2017, however is still in the very early stages of forming a plan and therefore carries little weight in the decision making process in accordance with paragraph 48 of the Framework. Accordingly, the Cornwall Local Plan is the relevant development plan document for the determination of this application.

## 5. Other Material Planning Considerations

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

- 5.1. The Framework sets out the Government's planning policies for England and how these are expected to be applied.
- 5.2. The Framework is an important material consideration that, on its own, is of such weight that it can justify a decision contrary to the relevant policies of the DP.
- 5.3. Paragraph 8 sets out the three dimensions to sustainable development which are "*economic, social and environmental*". These dimensions are discussed in detail in Section 7.
- 5.4. Paragraph 11 of the Framework states that there is a:

*"presumption in favour of sustainable development... for decision-taking this means:*

- c) *Approving development proposals that accord with the development plan without delay*
- d) *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
  - i) *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
  - ii) *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."* (Paragraph 11, the Framework).

- 5.5. Paragraph 92 of the Framework positively promotes the provision of community facilities such as schools.
- 5.6. Paragraph 94 of the Framework states:

*"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.*" (paragraph 94, the Framework) [Bailey Partnership bold].

5.7. Paragraph 97 of the Framework states:

*"Existing open space, sports and recreational buildings and land, including playing fields should not be built on unless:*

- a) *An assessment has been undertaken which has clearly shown the open space, buildings to land to be surplus to requirements, or*
- b) ***The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location, or***
- c) ***The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.***" (Paragraph 97, the Framework) [Bailey Partnership Bold].

#### ***Policy Statement - Planning for Schools Development (2011)***

5.8. Communities and Local Government published Planning for Schools Development in 2011 to support the alteration of good schools through the planning system. In addition to a presumption in favour of school development the Policy Statement states:

*"The Government believes that the planning system should operate in a positive manner when dealing with proposals for the creation, expansion and alteration of state-funded schools..."* (Policy statement - planning for schools development, Department for Communities and Local Government, August 2011).

#### ***Output Specification Generic Design Brief (November 2020 update)***

5.9. The Department for Education's Output Specification Generic Design Brief November 2020 update, sets out the technical standards and performance criteria for schools, and relates to both internal and external space and grounds in schools. The Generic Design Brief, and technical annexes form the specification for the construction of new schools and the alteration of existing schools.

## 5.10. Paragraph 2.4.1.2. states:

*“In a Whole School Project on a new or existing Site, the Contractor shall ensure that the site layout:*

- a) Provides a safe and attractive environment for children and young people offering a variety of different settings for sport, outdoor teaching, social and recreational activities*
- b) Provides secure play areas relative to the needs of the different age ranges of pupils and satisfying the School’s safeguarding policies... (paragraph 2.4.1.2. Output Specification Generic Design Brief, November 2020 update)*

## 5.11. When considering boundary fencing, the guidance requires any new fencing to the site boundary to be designed to meet the security requirements the School-Specific Brief, while achieving a minimum of 2.4m in height (paragraph 8.1.1.1, Technical Annex 2B: External Space and Grounds, May 2019 update).

**Secure By Design, New Schools 2014 Guidance**

## 5.12. Secure By Design, New Schools 2014 guidance states:

***“A clearly defined boundary using a fence, wall or other effective barrier against intrusion is a prerequisite for a secure site and to define ownership. A secure boundary will help staff manage the school site by limiting trespass and by channelling visitors to the site through appropriate entrances. A secure boundary will also frustrate the intruder intent on breaking into the school out of hours and or limit the quantity or type of goods that can be stolen.”*** (Secure By Design, New Schools 2014) [Bailey Partnership bold].

*[and]*

***“Secure boundaries are not just important for combating unauthorised access. A secure boundary can also provide the security and safety of very young children, keeping them in and the ‘uninvited’ out.”*** (Secured By Design, New School 2014) [Bailey Partnership bold].

## 6. Sport England Statement

6.1. Paragraph 74 of the Framework sets out:

*“Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:*

- *An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- ***The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or***
- *The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss”.*  
(Paragraph 74, the Framework) [Bailey Partnership Bold]

6.2. In this instance, the proposals on and around the interpretable playing field areas consist of the new car parking area, and the new multi-use games area (MUGA). The new car park is being located in such a way that it makes use of an area of the field that is not sufficiently sized to accommodate a sports pitch, and resultantly squares of the North West area of the field. Owing to the placement of the long-jump pit, and amphitheatre style banking on the southern portion of the field, this crescent of the field is also unsuitably sized to accommodate a formal Sport England pitch, however by the investment and provision of the new MUGA, an improved sports provision can be offered.

6.3. The existing playing field is not of a particularly beneficial shape for the provision of formal sports pitches, however in order to demonstrate the maximum sized pitch that can suit the existing playing field, we have indicated a standardised pitch size which meets the specifications for the Sport England ‘football: mini soccer U9-10’<sup>2</sup>. This demonstrates that the proposals are not impacting on the existing constraints to maximum pitch limits that the school has.

### ***Sport England Exceptions***

6.4. In respect to Sport England policy, Playing Fields Policy and Guidance, March 2018, SE exceptions policies refers to 5 different scenarios where development on existing playing fields could be acceptable:

- Exception E1 - Excess of provision
- Exception E2 - Ancillary development
- Exception E3 - Land incapable of forming part of a pitch
- Exception E4 - Replacement provision

- Exception E5 - Sports facilities

### **Exception E3 - Land Incapable of Forming Part of a Pitch**

6.5. SE's guidance states that:

*“The proposed development affects only land incapable of forming, or forming part of, a playing pitch, and does not result in the loss of or inability to make use of any playing pitch (including the maintenance of adequate safety margins), a reduction in the size of the playing areas of any playing pitch or the loss of any other sporting/ancillary facilities on the site”* (Exception 3, SE guidance)

6.6. The site for the car park T-s off from the main pitch suitable area and is insufficiently sized to support or contribute to the provision of a marked pitch. Incidentally, the placement of the Long-jump pit and sculpting of the landscaping on the Southern boundary also renders a large crescent of field area as unsuitably sized and improperly shaped to accommodate a Sport England sized playing pitch.

6.7. It is therefore considered that Exception E3 also applies to the proposed development.

### **Exception E4 - Replacement provision**

6.8. SE's guidance states that:

*“The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:*

- *Of equivalent or better quality, and*
- *Of equivalent or greater quantity, and*
- *In a suitable location, and*
- *Subject to equivalent or better accessibility and management arrangements”* (Exception 4, SE guidance).

6.9. An existing portion of grassed site will be transformed into an all weather playing surface which can be used in all weather conditions. This will also help to support the school towards the BB103 external hard and soft PE recommendations.

6.10. This clearly represents provision of a better quality and greater quantity given the site is currently unable to be used for organised sport for part of the year.

### **Exception E5 - Sports Facilities**

- 6.11. SE's guidance states that: "*The proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing field or playing fields*" (Exception 5, SE guidance).
- 6.12. The proposed all weather playing pitch would be available for year round use. The school is occasionally let out to community groups as such the all weather pitch may also benefit the wider community.
- 6.13. It is therefore considered that Exception E5 also applies to the proposed development.

## 7. Assessment

### ***Principle - Accord with DP***

7.1. The site is an existing school and therefore the site is established for education purposes.

### ***Principle - Accord with the Framework***

7.2. The provision of a new fit for purpose school facility is supported by paragraphs 92 and 94 of the Framework which seeks to enable and enhance the provision of valuable community facilities such as schools.

### ***Need***

7.3. The school is being expanded by 0.5FE (105 pupils) owing to a local need already in existence. The expansion of the school will allow for more local pupils to attend their local school, rather than being bussed elsewhere or having to rely more heavily on vehicular transport.

7.4. Paragraph 94 of the Framework notes that LPAs should take a proactive, positive and collaborative approach to ensuring that there is sufficient choice of school places available to meet the needs of existing and new communities. This is particularly important given the recent new residential development to the East and South of the site, which adds further pressure for more school places to become available.

7.5. The proposals will also allow for improved outdoor facilities, which can be enjoyed by the pupils through their curriculum, and also through extra curricular activities.

### ***Design***

7.6. Paragraph 2.74 of the CLP notes that the design of new developments is required to shape the way places work, and includes improving social wellbeing, and quality of life by increasing opportunities for exercise, and helping to find solutions to public health. The proposals set out in the Statement accord with the CLP, providing playing pitches and playgrounds for the school to enjoy year round.

7.7. The new teaching accommodation has been designed to be easily accessible, and of a scale that meets the needs of Perranporth Community Primary School, in accordance with Policy 12 of the CLP.

- 7.8. Policy 13 deals with development standards and states:

*“All new developments will be expected to achieve the provision of the following:...*

*3. An appropriate level of off street parking and cycle parking taking into account the accessibility of the location in terms of public transport and proximity to facilities and services;...*

*6. Utilising opportunities for natural lighting, ventilation and heating by design, layout and orientation;”* (Policy 13, CLP)

- 7.9. It is clear that the proposals provide sufficient off street parking through the provision of more car and cycle spaces. Further, consideration has been given to the lighting and ventilation within the proposed teaching accommodation, in accordance with Policy 13 of the CLP.

### ***Transport and Accessibility***

- 7.10. The proposals provide increased parking on site, together with the addition of a ‘drop-off area’ from Liskey Hill, and cycle parking. The transport improvements to the school will allow more pupils to arrive safely through sustainable transport means, including walking and cycling, as identified in Paragraph 102 of the Framework.

- 7.11. Policy 13 of the CLP also notes that developments should provide an appropriate level of off street parking and cycle parking. The new parking arrangements will form 11 bays and 1 accessible bay in the lower site and 10 new bays and an additional second accessible bay. The Children’s centre retains its 2 bays on the lower level. The scheme will also provide secure cycle and scooter spaces, in accordance with the CLP aside the new car park. The school notes that their existing provisions are not well utilised due to the steep local topography.

### ***Arboriculture***

- 7.12. The proposals have been developed to protect as many trees as possible. There will be no loss of hedgerow as a result of the proposals, no trees are planned to be felled. The Arboricultural Report by Ecological Surveys Ltd. notes that no-dig constructions should be used for the car park areas near tree root zones.

- 7.13. Mitigation measures include fencing around Root Protection Areas for the remaining trees, together with Construction Exclusion Zones.

### ***Ecology***

- 7.14. A Preliminary Ecological Appraisal (PEA) was conducted in February 2020, and updated in December 2020. The PEA found that there was a moderate potential for amphibians in the derelict swimming pool. The area to the east of the pool and scrub to the north and south of the pool presents moderate bird and low reptile potential. The area proposed as the drop off point is confirmed as a bird nesting area. There was low potential for bats over the whole site.
- 7.15. A number of mitigation measures have been, and will be undertaken to ensure the vitality of local ecology, and in accordance with paragraph 175 of the Framework. Grass on the playing field is to be maintained as cut short to prevent further habitation of reptile species, and the area behind the existing swimming pool should be retained with the grassy edges to act as a reptile corridor.
- 7.16. Mitigation measures are set out in the Preliminary Ecological Appraisal, and include construction phase mitigation measures. During the construction phase, the site must be kept clear and tidy to prevent animals becoming entangled. Furthermore, trenches or large excavations should be covered overnight to prevent wildlife becoming trapped, as well as piles of brush wood or log piles being carefully inspected prior to removal to avoid any harm to nesting birds, or hedgehogs.
- 7.17. It has also been noted that the pool and pond should be drained in phases to protect any aquatic wildlife. Common duckweed should also be removed and disposed of safely due to its tendency to spread quickly. The full PEA by Ecological Surveys Ltd has been submitted with this application.

### ***Drainage and Flood Risk***

- 7.18. The site is located within Flood Zone 1, the area least at risk of flooding, which has been identified by Airey and Coles Consulting Engineers, in the Engineering Report.
- 7.19. A Flood Risk Assessment and Drainage Strategy has been produced by The Bailey Partnership BSW Engineering Team. Soakaways are deemed unviable on the basis of constraints from proximity of buildings and the risk of ground instability from existing cuttings
- 7.20. Sustainable urban drainage systems are being utilised where possible. Separate systems for surface water and foul water discharge are proposed. The proposed drainage strategy is not considered to create or increase the flood risk to the proposed site, adjacent sites of those downstream, and will offer a betterment on existing drainage conditions.

### ***Significant Benefits of the Proposal***

- 7.21. The proposal will deliver precisely what the Government seeks (paragraph 94 of the Framework) by way of delivering enhanced facilities to the school, allowing local children to be able to attend a local primary school. This is a significant social benefit of the proposals.
- 7.22. Economic and social benefits of the proposal include the support of employment during construction who would make use of local services and facilities. The proposal therefore delivers substantial social and economic benefits.
- 7.23. The above mentioned significant benefits are considered to be of such weight that these can justify a positive determination of the application.

## **8. Conclusion**

- 8.1. The proposals are plainly in accordance with the adopted DP. Therefore in accordance with paragraph 11 of the Framework the proposal should be approved without delay.
- 8.2. The principle of development is in accordance with paragraph 94 of the Framework through the provision of additional teaching accommodation to meet the needs of the community, allowing sufficient choice of school places. Further, the proposals to replace existing sports facilities and playing fields with higher quality facilities is supported by paragraph 97 of the Framework.
- 8.3. The proposals also provide significant social, economic and environmental benefits, which carry substantial weight in its favour.
- 8.4. Accordingly, the applicant respectfully requests that the application is approved without delay.