



WHITGIFT SCHOOL

**RETENTION OF TEMPORARY PORTAKABIN CLASSROOMS AND TEMPORARY CAR
PARK FOR THREE YEARS**

PLANNING STATEMENT

MARCH 2021

Prepared on behalf of:

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1 INTRODUCTION

1.1 Background

This Planning Statement has been produced by Surface Property (Surface), on behalf of Portakabin Ltd, in support of an application for retrospective planning consent to retain eight temporary Portakabin classrooms which have been erected at Whitgift School in South Croydon.

The application also seeks consent for the retention of a temporary car park which has been constructed to replace parking places displaced by the construction of the classrooms, and by the temporary pedestrianisation of the main school site.

Consent is sought to retain the temporary classrooms and car park for a period of three years after which the structures would be removed, and the sites restored to their previous condition.

Due to the Covid-19 situation the School requires additional classroom space to comply with current guidelines relating to social distancing, and to enable the effective separation of school year groups. At present the size and layout of the existing school buildings does not provide sufficient space to allow the school to operate in line with these guidelines. The temporary classrooms have been erected in order to allow the school to operate and to deliver an effective curriculum while observing these Government Covid-19 guidelines.

As mentioned above, the application also seeks consent for the retention of a temporary car parking area which has been created to replace parking spaces displaced by the construction of the temporary classrooms, and other spaces which have been similarly displaced by the pedestrianisation of the main school site, which again has been undertaken to assist with social distancing measures.

The full scope of works subject of the Planning Application this Statement supports is detailed in the following section of this Statement and the associated drawings and documents, as listed in Section 5.

2 PROPOSED DEVELOPMENT

2.1 Site Description

In March 1596, John Whitgift, Archbishop of Canterbury, laid the foundation stones of a hospital for the poor at North End in Croydon. Attached to the hospital was a grammar school which opened in 1600. What became Whitgift School moved to its present site in 1931 and now caters for around 1,500 male pupils between the ages of 10 and 18.

The temporary Portakabin classroom buildings are located within the School grounds and occupy part of an existing hardstanding area, previously used as a car park. The Portakabins are sited immediately to the northwest of, and partly surrounded and screened by the main school buildings. The location both takes advantage of the existing hardstanding and effectively integrates the temporary classrooms with the

other school buildings and services. No works to reinforce or otherwise upgrade the existing hardstanding to accommodate the Portakabin classrooms were required.

A temporary car park has also been created to the southwest of the main school buildings to replace spaces now occupied by the Portakabin classrooms, and some other spaces elsewhere on the school site which are also temporarily unavailable due to a necessity to re- design traffic flows to accommodate the pedestrianisation of the main school site.

No permanent surface has created to accommodate the temporary car park which consists of temporary plastic panels which have been placed directly on to the existing surface. Details of the proposed temporary car park are provided on pages 4 and 5 of the associated Design and Access Statement and the associated plans.

No existing trees, vegetation or other habitat has been affected by the installation of the Portakabin classrooms and the temporary car park occupies an area of mown amenity grass of negligible ecological value. The proposal does not affect any existing Public Right of Ways.

There are two listed structures within the school site located to the east of the main school buildings, the South Croydon War Memorial and a cottage. There is no intervisibility between these structures and the Portakabin classrooms and there would be no adverse effects on their settings.

It is also emphasised that the installation of the additional Portakabin classrooms has and will not result in any increase in pupil or staff numbers at the School.

2.2 The Need for the Development

As stated above the four portacabin units for which temporary planning consent is sought have provided the school with eight additional classrooms, each with its own separate access. This will greatly assist with the delivery of the School's normal curriculum while still adhering to the Government's guidance on social distancing. The School has also responded to the current situation through the pedestrianisation of the main school site to allow pupils and staff to better maintain social distancing while moving between the various parts of the School.

This pedestrianisation and the temporary loss of parking spaces from the area where the Portakabin classrooms have been erected has necessitated the construction of additional temporary car parking spaces in an area to the southwest of the main school buildings, as detailed in the accompanying application plans and Design and Access Statement.

These measures are a direct result of the School seeking to respond responsibly to the Covid-19 situation, and to continue with the delivery of as comprehensive a curriculum as possible as the education sector seeks to restart face-to-face teaching in early 2021, as infection rates are predicted to decline.

2.3 General Scheme Overview

This application seeks a temporary three-year retrospective planning consent for the retention of a block of eight classrooms based on four Portakabin Buildings, installed as two adjacent two storey blocks. Details of the Portakabin classrooms are set out in the Design and Access Statement and the plans and elevation drawings accompanying the planning application.

The two storey Portakabin blocks are 7.1m tall, are 25.34m in length and 16.8m wide and are finished externally with a grey coated galvanised steel cladding, as illustrated in the accompanying plans.

The temporary car park to the south-west of the main school site, which has been installed to accommodate car parking displaced from the main school site, has been constructed from Supa-Trac plastic panels manufactured by CAP TRAC. The plastic panels have been laid directly on to the existing ground surface to provide a level and dry surface for parked vehicles. The temporary car park provides spaces for up to 124 cars and covers an area of 2,796m². Again, full details are provided in the accompanying plans and the Design and Access Statement.

3 PLANNING POLICY APPRAISAL

3.1 Background

This document has been produced in support of a development which requires retrospective planning permission under the Town & Country Planning Act 1990. A temporary Planning Permission for a period of 3 years is being sought. Following the expiry of this 3-year period the land occupied by both the temporary classrooms and the temporary car park will be reinstated to its previous condition.

3.2 National Planning Policy

National planning policy for development is provided within the National Planning Policy Framework (19 June 2019) (the NPPF)¹.

Section 38(6) of the Planning and Compulsory Act 2004 requires that planning applications should be considered against the policies within the statutory development plan unless material considerations indicate otherwise.

Paragraph 20 of the NPPF stipulates that "*strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for: ... community facilities (such as health, educational and cultural infrastructure)*". The NPPF also states in paragraph 121 that Local Planning Authorities should take a positive approach to applications "*that make more effective use of sites that provide community services such as schools and hospitals, provided this maintains or improves the quality of service provision and access to open space.*"

Justification and Amplification

¹ National Planning Policy Framework, (2019) [Online] Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> (Accessed 08/02/21)

The NPPF appears to support the merits of the works for which retrospective consent is sought, as they have made use of land within an existing school, delivering the more effective use of the school site to provide a significant increase in classroom space at a time when social distancing is essential due to the ongoing Covid-19 pandemic. This application seeks a temporary three-year retrospective consent for measures which have been undertaken in direct response to the pandemic, and which seek to facilitate the safe delivery of the School's curriculum in challenging times, improving the quality of the service it is currently able to deliver.

3.3 The Croydon Local Plan

The Croydon Local Plan (CLP) was adopted in February 2018. The Plan brings together wider Strategic Policies with a series of Detailed Policies and Proposals. The Local Plan has an overall vision, objectives and policies which seek to ensure that Croydon continues to be an attractive and thriving place in which to live, work, and to visit. The Local Plan seeks to deliver sustainable growth, and the renewal and regeneration of the Borough.

The CLP includes a range of policies and objectives which seek to maintain and enhance the existing range of educational services supplied in the Borough. In more normal times, the policy framework is chiefly focussed on delivering the maintenance and enhancement of educational facilities in response to development pressures, demographic changes and social and economic need.

The development for which retrospective planning consent is sought effectively falls outwith the normal range of development proposals in relation to education services in the Borough in that it does not relate to a requirement for additional facilities due to demographic changes, nor a requirement to improve and expand existing facilities in response to economic or structural need. Rather it relates to a necessary but temporary need to expand classroom space in response to an unforeseen pandemic. There would be no need for the scheme in normal times and the development represents a temporary and reversible response to a specific requirement for increased teaching space to comply with social distancing guidance.

3.3.1 Strategic Objectives

Strategic Objectives 4 and 6 in the CLP are considered to be particularly relevant to the consideration of this retrospective application in that they seek to improve the delivery of education services in the Borough

Strategic Objective 4 seeks to reduce social, economic and environmental deprivation, particularly where it is spatially concentrated, by taking priority measures to reduce unemployment, improve skills and education and renew housing, community and environmental conditions.

Strategic Objective 6 seeks to promote local services and facilities including education.

Justification and Amplification

The development for which consent is sought, meets with the aims and tests of these two Strategic Objectives in that the temporary retention of the additional Portakabin classrooms and the associated car park will support the delivery and promotion of education by Whitgift School during the current Covid-19 crisis. If granted planning permission, the temporary retention of the development would, therefore, support the operation of an existing educational establishment within the Borough

3.3.2 Policy SP 5: Community Facilities

Policy SP5 in the CLP is concerned with the delivery of Community Facilities. Criteria c and d of Sub-Policy SP5.2 state, that the Council and its partners will create and safeguard opportunities for healthy, fulfilling and active lifestyles by Improving education and skills training in Croydon and encouraging life-long learning; and will also promote the growth and expansion of further and higher education to improve skills and act as a driver of growth and enterprise in the local economy.

Sub-Policy SP5.4 also states that the Council will work to ensure that the pattern, scale and quality of community and education facilities will be adjusted to meet the evolving needs of the community and improve service provision.

With specific regard to *Education and skills*, sub-policy SP5.9 states that the Council will support investment in the improvement and expansion of primary and secondary schools and special schools to meet the needs of the community and its growing population.

Sub-policy SP5.12 states that the Council will support the growth and improvement of further and higher education in the Borough.

Justification and Amplification

The development, in principle, meets with the aims and sequential test of the relevant parts of CLP Policy SP5 in that it is assisting with the ongoing delivery of existing educational services at a time of significant pressure on the sector. The temporary retention of the development will also both address the evolving needs of the community and deliver improved service provision in response to the Covid-19 situation, by allowing a major educational provider to accommodate the restrictions in its operation posed by the pandemic. The scheme is also delivering an improvement in the delivery of education in the Borough, over and above that which would previously have been achievable at Whitgift school in the absence of the temporary additional teaching space. The implementation of measures to inhibit the transmission of Covid-19 clearly also has a very significant health benefit.

3.3.3 Policy DM27: Biodiversity

Policy DM7 in the CLP is concerned with the protection and enhancement of biodiversity. The Policy states that to enhance biodiversity across the Borough and improve access to nature, development proposals should:

- Incorporate biodiversity on development sites to enhance local flora and fauna and aid pollination locally;
- Incorporate biodiversity within and on buildings in the form of green roofs, green walls or equivalent measures;
- Incorporate productive landscapes in the design and layout of buildings and landscaping of all major developments;
- Have no adverse impact on land with biodiversity or geo-diversity value as designated on the Policies Map; and
- Have no adverse impact on species of animal or plant or their habitat protected under British or European law, highlighted within a local/regional Biodiversity Action Plan, or when the Council is presented with evidence that a protected species would be affected.

Justification and Amplification

This application seeks consent for the retention of a temporary development and has not impacted on any valued habitat or protected species. The application is accompanied by an Ecological Appraisal which concludes that there is no requirement for any additional work to inform the assessment of the impacts of the development and any requirements for mitigation. The Appraisal has, however, provided the applicant with additional advice and guidance relating to bats and lighting across the wider school site.

The Appraisal concludes that the areas affected by the development represent low value habitats, such as amenity grassland and hardstanding, with limited ecological value and little potential to support protected and/or notable species. Due to the small scale and localised nature of the works which have been carried out, it is considered unlikely that the development has adversely impacted ecological features, and, as stated, no further surveys or mitigation are required.

Given the temporary and reversible nature of the development, it is not considered to be in conflict with CLP Policy DM27

3.3.4 Policy DM18: Heritage

Policy DM18 in the CLP is concerned with the protection of Heritage assets and conservation. The following parts of the Policy are considered to be potentially relevant to the development for which temporary retrospective consent is sought.

Sub-policy DDM18.1 states that the Council will determine all development proposals that affect heritage assets in accordance with the following:

1. Development affecting heritage assets will only be permitted if their significance is preserved or enhanced;
2. Proposals for development will only be permitted if they enhance the setting of the heritage asset affected or have no adverse impact on the existing setting.

Sub-policy DM18.2 relates to applications for development proposals that affect heritage assets or their settings.

Sub-policy DM18.3 states that to preserve and enhance Listed Buildings, Scheduled Monuments and Registered Parks and Gardens within the Borough, the Council will determine all development proposals that affect these heritage assets in accordance with the following:

1. Substantial harm to or loss of a Grade II Listed Building or Registered Park and Garden should be exceptional;
2. Substantial harm to or loss of a Grade I or II* Listed Building or a Scheduled Monument should be wholly exceptional; and
3. All alterations and extensions should enhance the character, features and setting of the building or monument and must not adversely affect the asset's significance.

Sub-policy DM18.5 states that the Council will determine all development proposals that affect Locally Listed Buildings in accordance with the following:

1. Substantial weight will be given to preserving and enhancing Locally Listed Buildings; where demolition is proposed, it should be demonstrated that all reasonable attempts have been made to retain all or part of the building;
2. All alterations and extensions should enhance the building's character, setting and features and must not adversely affect the significance of the building; and
3. All proposals for development must have regard to Croydon's Local List of Buildings of Historic or Architectural Importance Supplementary Planning Document or equivalent.

Sub CLP Policy DM18.8 states that all development proposals must preserve and enhance War Memorials and other monuments, and their settings.

Justification and Amplification

A Heritage Statement has been prepared and submitted in support of the application. The Statement identifies three heritage assets, the settings of which could potentially be subject to change as a result of the Development. These are illustrated on Figure 2 of the Heritage Statement, and include:

- NHLE 1358829 Grade II Haling Cottage (Whitgift School Headmaster's House);
- NHLE 1442708 Grade II Whitgift School War Memorial; and
- MLO104050 Whitgift School: School; Ornamental Pond; Park; Playing Field; Garden; Water Garden.

The Heritage Statement concludes that no changes in the settings of these heritage assets which would affect their cultural significance have occurred due to the

development for which retrospective consent is sought. This is due to a lack of visibility of the Development from these assets coupled with the common occurrence of temporary structures associated with schools, in regard to Whitgift School and its associated grounds. No mitigation is recommended.

The development does not have a direct or indirect effect on any heritage assets and is therefore considered to be in compliance with the relevant parts of CLP Policy DM18, particularly when the temporary nature of the proposal is also taken into account.

3.3.5 Policy DM30: Car and cycle parking in new development

Policy DM30 relates to car and cycle parking in new development and is relevant to the proposal given that it includes the temporary relocation of parking spaces within the school site.

Part of the policy states that new development should ensure that sufficient car parking is provided in accordance with Council standards, and that the provision of parking should not compromise the safety of pedestrians and cyclists.

Justification and Amplification

The development for which retrospective consent is sought does not include any requirement for an increase or decrease in parking. The School Travel Plan will remain in place and continue to promote accessibility by sustainable modes on travel. The development relates to the temporary relocation of existing parking spaces within the school site to accommodate temporary classrooms and to improve the pedestrian environment in the main school site. The relocation of the car parking spaces is therefore compatible with Policy DM30.

3.3.6 Policy DM31: Restricting temporary car parks

Policy DM31 seeks to control the development of temporary car parks, seeking to restrict such development unless it relates to temporary measures providing alternative parking spaces while a permanent car park undergoes redevelopment.

Paragraph 10.56 of the supporting text confirms that where a temporary car park is required because a nearby permanent car park is undergoing redevelopment (including replacement car parking), the Council may accept a proposal for a temporary car park to ensure that there is continued provision of car parking in a locality whilst redevelopment takes place.

The development for which temporary consent is sought does partly relate to the replacement of permanent car parking spaces which are temporarily unavailable but in this case this is due to a highly unusual and unpredictable situation in which parts of the school site have been temporarily reconfigured as a result of the Covid19 Pandemic.

Justification and Amplification

CLP Policy DM31 is partly relevant to the proposal in that it seeks to regulate the provision of temporary car parking, which is considered to be acceptable in principle where it replaced permanent parking which is temporarily unavailable due to development work. While the requirement for temporary parking at Whitgift School is a response to works due to a pandemic, the reasons for the development and its temporary nature are considered to be compatible with the overall objectives of the Policy.

3.3.7 Other Local Plan Policies

A range of other Policies in the Local Plan, primarily concerned with the promotion of good design and public amenity would potentially be relevant to the development if it were permanent and/or it was a response to normal development needs. In this case, however, the proposal is effectively a temporary and emergency measure in response to a pandemic and would be removed after a period of three or less years. It is not a response to any increase in pupil numbers or an increase in the range of services supplied by the School.

The need for the additional teaching space is urgent and the need for installing and retaining the additional classrooms and associated parking area are considered to outweigh any temporary effects.

4 SUMMARY AND CONCLUSIONS

The principle of the development for which temporary retrospective consent is sought is considered to be acceptable when reviewed against the relevant and applicable Local Plan Policies, given both the urgent need for additional classroom space coupled with the compatibility of use in conjunction with the existing school use, and efficiency of land use in containing it within the existing complex on an existing hardstanding.

This statement has sought to demonstrate that the retention of the eight Portakabin classrooms for a period of up to three years would be compliant with the provisions of the relevant national policy and local policy, as set out within in the Croydon Local Plan.

It is not considered that any significant material considerations exist to outweigh the current urgent need for the development, which is both necessary and fundamental to maintaining the safe operation of the School in line with current social distancing requirements.

In light of the above, the development is demonstrably sustainable in accordance with the NPPF for which there is a presumption in favour of as acknowledged in the Croydon Local Plan. The NPPF is clear that sustainable development which accords with an up-to date Development Plan should be granted planning permission without delay.

Given the aforementioned, the Applicant kindly requests that Croydon Borough Council **grant** planning permission for the development.

5 APPLICATION SUBMISSION

This planning application consists of the following submissions which should be read in conjunction with this Planning Statement:

- Application Form (including correct planning fee);
- GA Drawing – Ultima Modules Double Spanned (Elevations and Floor Plans);
- Proposed Location and Block Plan;
- Design and Access Statement;
- Ecological Appraisal;
- Heritage Statement.