



## Planning Statement

**Removal of the existing modular building and the erection of a new permanent single storey building, proposed refurbishment and associated works**

**Benwick Primary School, High Street, Benwick, March, Cambridgeshire, PE15 0XA**

**On Behalf of  
Cambridgeshire County Council**

**December 2023**

**Our Ref: PI 23 0011**

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# 1 Introduction

1.1 This Planning Statement has been prepared by Lisa Skinner Associates, (LSA Planning), for R G Carter on behalf of Cambridgeshire County Council, hereafter referred to as the applicant, in support of a full planning application to replace the existing modular building with a permanent structure. The full description of development is as follows:

*"Removal of the existing modular building and the erection of a new permanent single storey building, proposed refurbishment and associated works"*

1.2 This application for the proposed works is pursuant to Regulation 3 of the Town and Country Planning General Regulations 1992.












## Purpose and structure of this Report

1.3 The purpose of this report is to draw together the main planning issues in consideration of this proposal. This Statement is structured as follows:

- Section 2 considers the site location and surroundings;
- Section 3 provides the relevant planning history for the site;
- Section 4 provides feedback on pre-application discussions and the public consultation
- Section 5 describes the proposal;
- Section 6 identifies relevant national and local planning policy;
- Section 7 provides a planning assessment of the proposal; and
- and Section 8 draws conclusions in support of the application proposal

## Planning application documents

1.4 The application is accompanied by a variety of drawings that form part of this application submission that have been prepared by rhp architects as follows:

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-  BPS-RHP-TB-ZZ-DR-A-0400-P4 Planning Site Location Plan
  -  BPS-RHP-TB-ZZ-DR-A-0405-P4 Planning Ownership Plan
  -  BPS-RHP-TB-ZZ-DR-A-2000-P5 Planning Existing Plan Mobile
  -  BPS-RHP-TB-ZZ-DR-A-2005-P7 Planning Proposed Plan Permanent
  -  BPS-RHP-TB-ZZ-DR-A-2010-P4 Planning Proposed Roof Plan Permanent
  -  BPS-RHP-TB-ZZ-DR-A-2050-P5 Planning Existing Site Plan & Security Line Mobile
  -  BPS-RHP-TB-ZZ-DR-A-2055-P5 Planning Proposed Site Plan & Security Line Permanent
  -  BPS-RHP-TB-ZZ-DR-A-2100-P4 Planning Existing Elevations Mobile
  -  BPS-RHP-TB-ZZ-DR-A-2105-P7 Planning Proposed Elevations
  -  BPS-RHP-TB-ZZ-DR-A-2110-P2 Planning Proposed Context Elevations
  -  BPS-RHP-TB-ZZ-DR-A-2200-P2 Planning Proposed Sections Permanent

1.5 The application is also supported by the following documents:

- Local Authority Development Letter
- Covering letter
- Design and Access Statement
- Planning Statement
- Preliminary Ecology Survey
- Biodiversity Survey and Report, Cambridgeshire Biodiversity Checklist
- Flood Risk Assessment
- Surface Water Strategy
- Foul Drainage Strategy
- Construction Environmental Management Plan
- Energy Statement
- Noise Report
- Landscape Proposals
- Arboricultural Report

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## 2 Site and surroundings

2.1 Benwick, is a small village within Fenland District in Cambridgeshire that is located to the south of the B1093 between Doddington and Whittlesey, approximately 15 miles south-east of Peterborough and 30 miles north of Cambridge. The Primary School is located on the southeastern periphery of the village on the High Street and is situated within a predominantly residential area. The High Street is to the east of the school site, with the back gardens of the residential properties of Green Lane and the Old West Estate bounding the school site to the north, south and west. The village hall and Benwick Church lie to the north. The site context is shown in Figure 1 below.



Figure 1: Extract Google Maps - Aerial image

2.2 The total site area of the existing primary school is 6,893m<sup>2</sup>, including car parking and circulation areas to the front of the school. The red line application site as identified on the site location plan is 4,354m<sup>2</sup> and this identifies the land subject to the development proposals. The land identified within the blue line, is land within the County Council's ownership but does not form part of the application and development proposals. The School comprises a 0.4 FE school with a capacity of 105 pupil places and currently caters for children between ages 4 and 11 years, covering reception stage and year groups 1 to 6. The site also contains the Flutterbies day nursery and the village hall.

2.3 Parking for staff is provided on site in the adjacent car park with space for 7 vehicles. Alternative parking is available on the High Street. Secure cycle parking is provided for staff and pupils in the form of a bike rack adjacent to the playground, inside the main gates.

2.4 The existing school buildings are in the southeastern half of the school site, with the school playing field located in the northwest. The primary school buildings comprise the original Victorian school house which accommodates classrooms, staff and office facilities over two stories, the adjacent dining block and the mobile classroom block which is sited adjacent to the playground towards the western boundary of the school. The buildings are predominantly single-storey, built in buff facing brickwork with a combination of pitched roofs covered in slates and flat roofs and single-ply felt coverings, see Figure 2 below.



Figure 2: View of the school from the High Street

View of a mobile classroom

2.5 There are separate pedestrian and vehicular entrances to the school which are accessed from the High Street, which follows Ramsey Road (B1096) and is south of the B1093. One vehicle access leading directly to the nursery and dining room area and the other to the staff car park. The main pedestrian access is via the car park area with secondary access between the old school house and dining area.

2.6 Benwick Primary School is not situated within a Conservation Area nor are there any listed buildings adjacent to the site. The site is located within Flood Zone 3 but there are flood defences in the area. It is located within the attenuation area covered by the Middle Level Commission.

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## 3 Planning History

3.1 The key planning history that is relevant to this site relates to the following planning applications that have been submitted to the County Council. These relate primarily to the provision of mobile classrooms:

- Non-Material Amendment application to change the description of planning permission F/2007/16/CC to Retention of 7 bay 21m x 8.7m approx. mobile classroom building on existing Primary School site for a temporary period Ref. No: CCC/21/031/NMW | Status: Approve
- Retention of 7 bay 21m x 8.7m approx. mobile classroom building on existing Primary School site for a temporary period. Informative: - Section 73 application to develop land without complying with condition 3 of planning permission F/2007/16/CC to extend the temporary period until 31 August 2024. Ref. No: CCC/21/032/VAR | Status: Approve
- Removal of existing mobile classroom building, and erection of 7 bay 21m x 8.7m approx mobile classroom building on existing Primary School site until end of August 2021. Ref. No: F/2007/16/CC | Status: Approve
- Variation of Condition 1 of planning permission F/2007/10/CC to allow retention of mobile classroom until 31 August 2020. Ref. No: F/2004/15/CC | Status: Approve
- Erection Of One 3-bay Mobile Classroom Ref. No: F/00397/00/CC | Status: Approve
- Erection of single-storey detached building to provide kitchen & dining room Ref. No: F/00844/98/CC | Status: Approve
- Erection Of Ground Floor Extension to Form Staff Accommodation Ref. No: F/01549/89/CC | Status: Approve

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## 4 Pre-application discussions and Public Consultation

### Pre-application advice

4.1 The applicant has entered pre-application discussions with the County Planning Authority, County Highway Authority, the Lead Local Flood Authority, (LLFA) and the District Council. A joint meeting was held on 25 October 2023 and further discussions have been held separately to discuss specific issues. The key issues identified were as follows:

### Planning Feedback

4.2 The County Planning Officer provided the following feedback at the meeting:

- The principle of replacing the modular building with a permanent structure was considered acceptable
- The elevational drawings needed to be simplified to provide a clearer image of the proposal
- The technical reports needed to be consistent with the final layout proposed
- A section would be useful to show the relationship with the dwellings to the rear of the site
- The impact of the development on the existing trees will need to be carefully considered and any potential impact during construction
- A colour image of the proposal would be useful along with a street scene view
- The list of technical reports to support the application were discussed and agreed

4.3 The District Council were invited to the pre-application meeting on 25 October but were unable to attend due to other commitments. Whilst further discussions have taken place with the District, it has not been possible to arrange a separate meeting and guarantee receiving feedback from the District prior to the submission of this application due to their current workloads. The District will be formally consulted during the processing of the main application and we will respond to any comments promptly at that stage.

4.4 A copy of the response from the County Planning Authority is attached at Appendix 1.

### Highway matters

4.5 The County Highway Authority confirmed by e-mail dated 23 October 2023 that: *“Following on from our meeting on the Friday 22nd September, I can confirm that on the basis that the planning application will be to replace temporary facilities at Benwick with equivalent permanent ones, thus resulting in no intensification, I will not require any alterations to the access nor off-site works. I will however require a construction traffic management plan to be included in the planning submission.”*

4.6 A copy of this response is attached at Appendix 2.



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### Flood Risk

- 4.7 A meeting was held with the LLFA on 16 November 2023 to discuss the potential options for surface water drainage at the site due to the limited number of options available to dispose of surface water. This is due to the underlying ground conditions that make it unfeasible to provide soakaways, there are no public surface water sewers near the site and Anglian Water will not accept any surface water into the foul network and there are no combined sewers within vicinity of the site either. The details that accompany this submission following on from these discussions.
- 4.8 A copy of this response is attached at Appendix 3.

### Public Consultation

- 4.9 This is a minor application in relation to the scale and nature of the proposed development which is for a replacement structure. The public consultation has therefore been proportionate to this. A leaflet detailing the nature of the proposal has been delivered to residents adjoining the site and Benwick Parish Council has also been notified.

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## 5 The Proposed Development

5.1 This planning application seeks full planning permission for the:

*“Removal of the existing modular building and the erection of a new permanent single storey building, proposed refurbishment and associated works”*

5.2 The capacity for the school is currently 105 pupils and they are organised into four classes. The current forecast for primary aged children in the area is predicated to remain between 90-100. The classroom accommodation is currently provided in the form of three permanent classrooms and two additional classrooms in a mobile block. It is intended to replace the mobile classroom with two permanent classrooms and there will be no increase in pupil or staff numbers at the school. The total floor area of the proposed classroom block is 157 square metres and this includes a cloakroom, WC's, plant and cleaners' area. It is designed with a mono pitch roof with an eaves height of 3.6 m and a ridge height of 4.9m. The materials would include self-coloured cladding panels with UPVC windows and doors.

5.3 The new facilities are planned to open in September 2024. The proposal also includes the following elements:

- New stepped access points to the classrooms at each end of the building
- New ramped access to the front of the building
- New play area with shrub and tree planting to provide summer shade
- New 2m wide strip to be planted along the site boundary with a wildflower mix to support biodiversity net gain.
- Temporary construction compound and associated access
- Existing car park laid out with clearly defined parking spaces
- Existing gate removed and a new fence with a 3.5m wide access gate installed to the rear of the exiting car park

5.4 There are some minor internal changes to the WC/changing areas in the main school building that require refurbishment but there are no associated external alteration to the existing school. The refurbishment works do not require planning permission but have been included for completeness. The modular unit will need to be removed from the site prior to the works subject to this application commencing and is subject to a separate planning permission as listed in the Section 3 above.

5.5 The primary catchment area for the school is Benwick village, however pupils travel in from other areas such as Forty Foot, March, Ramsey and Doddington due to parental preference.

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## 6 Planning Policy

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.2 Whilst the National Planning Policy Framework (NPPF) and the National Planning Guidance (NPPG) do not form part of the development plan they are significant material considerations in the determination of this planning application. The following section is broken down into National and Local Policy and identifies the main relevant policies that relate to the proposed development.

### National Planning Policy Framework

- 6.3 The National Planning Policy Framework (NPPF). The overriding thrust of the NPPF remains the presumption in favour of sustainable development, through the promotion of economic growth, social progress and environmental enhancement.
- 6.4 The framework supports growth and innovation whilst achieving improved development standards and environmental protection and requires that these gains should be sought jointly. The following sections are considered relevant to this application:
- Section 2 Achieving sustainable development
  - Section 4 Decision-making
  - Section 8 Promoting healthy and safe communities
  - Section 9 Promoting sustainable transport
  - Section 11 Making effective use of land
  - Section 12. Achieving well-designed places
  - Section 14 Meeting the challenge of climate change, flooding and coastal change
  - Section 15 Conserving and enhancing the natural environment
  - Section 16 Conserving and enhancing the historic environment

- 6.5 The following text highlights key paragraphs that are relevant to this application.

#### Section 2 – Achieving sustainable development

- 6.6 As stated at paragraph 10, the Framework seeks to ensure that "*... sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11)*". The key paragraphs will be referred to below.

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6.7 Paragraph 11 relates to decision making with a presumption in favour of sustainable development which is a core theme throughout the NPPF. It is set out at Paragraph 12 and is required to be incorporated in plan making and pursued in decision making. The NPPF is clear that there are economic, social and environmental dimensions to sustainable forms of development.

6.8 For decision-taking this means:

*"c) approving development proposals that accord with an up-to-date development plan without delay; ..."*

#### Determining Planning Applications

6.9 Paragraph 12 states the presumption in favour of sustainable development does not change the status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan, permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.

#### Section 4 - Decision-making

6.10 Paragraph 38 requires local planning authorities to approach decisions on proposed development in a positive and creative way and pre-application discussions are encouraged. Paragraphs 55 to 57 refer to the use of planning conditions and obligations.

#### Section 8 - Promoting healthy and safe communities

6.11 This Chapter is of particular relevance and confirms that the planning system has a role to play in facilitating social interaction and creating healthy, inclusive communities. Local Authorities are encouraged to plan positively for the provision of community facilities and ensure that services are able to develop and modernise in a way that is sustainable and for the benefit of the community.

6.12 Paragraph 93 states that planning authorities should seek to provide the social, recreational and cultural facilities and services the community needs. Planning policies and decisions should plan positively for community facilities that enhance the sustainability of communities and residential environments. This includes ensuring that established facilities are able to develop and modernise for the benefit of the community.

6.13 Paragraph 95 of the NPPF attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. The NPPF encourages Local Authorities to take a positive, proactive and collaborative approach to meeting the education needs of the community and should give great weight to the need to expand schools and to development that will widen choice in education.

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6.14 Paragraph 96 states to ensure faster delivery of public services, that includes schools, local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted.

6.15 Paragraphs 98 to 99 refer to open space and recreation and the importance of these for health and well-being in the community. Any loss of existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless an assessment has been undertaken to show it is surplus to requirements, the loss is replaced or alternative provision is provided where the benefits outweighs the loss.

#### Section 9 - Promoting sustainable transport

6.16 This Section considers the potential impact that a development proposal may have on the transport network and opportunities that may be available to improve the situation including promoting walking, cycling and the use of public transport. Paragraph 110 seeks to ensure appropriate opportunities have been taken to secure sustainable modes of transport, safe and suitable access is achieved for all users. Paragraph 111 continues that:

*"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."*

6.17 Paragraph 112 seeks to give priority to pedestrian and cyclists and point c) "... create places that are safe, secure and attractive - which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards."

#### Section 11 - Making effective use of land

6.18 This section requires an effective use of land for all uses with local planning authorities taking a positive approach to applications. Paragraph 120 d) states:

*"d) promote and support the development of underutilized land and buildings, ....;"*

6.19 Paragraph 124 states:

*"d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change;"*

#### Section 12 - Achieving well-designed places

6.20 Paragraphs 126 to 132 seek to ensure good quality design and require development to function well over its lifetime, be visually attractive with a considered layout, be sympathetic to local character, establish a strong sense of place and optimise the development potential of a site. Good design is however seen to go beyond simple aesthetics. Policies and decisions should ensure there is a

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positive relationship maintained between people and place and through the integration of the development in the natural, built and historic environments.

6.21 Paragraph 130. Planning policies and decisions should ensure that developments:

*“(e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks.”*

#### Section 14 - Meeting the challenge of climate change, flooding and coastal change

6.22 This section seeks to support the transition to a low carbon future taking full account of flood risk and coastal change. Paragraph 154 refers to the vulnerability of a development and paragraph 155 seeks to increase the use and supply of renewable and low carbon energy and heat.

6.23 Paragraph 159 seeks to avoid inappropriate development in areas at risk of flooding by directing development away from areas at highest risk. Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. Paragraphs 167 to 169 refer to determining planning applications and that development should not be allowed to increase flood risk elsewhere and sustainable drainage systems should be incorporated into the design.

#### Section 15 - Conserving and enhancing the natural environment

6.24 This Section focuses on recognising the importance of the environment and the biodiversity of a site. The NPPF sets out that permission for major developments should be refused where they would have an unacceptable effect on designated sites and landscapes on a local, national and international scale.

6.25 Impacts on biodiversity and geodiversity should be minimised as far as possible, with opportunities to incorporate biodiversity into development and landscaping schemes being encouraged at all times.

6.26 Paragraph 185 refers specifically to ensuring development is appropriate to its location and considers noise impact and other forms of pollution.

#### Section 16 - Conserving and enhancing the historic environment

6.27 This section refers to historic assets as being an irreplaceable resource and should be conserved in a manner appropriate to their significance. For proposals that have the potential to affect the significance of a heritage asset, paragraph 194 requires applicants to identify and describe the significance of any heritage assets that may be affected, including any contribution made by their setting. The level of detail provided should be proportionate to the significance of the heritage assets affected.

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6.28 Paragraphs 199 to 203 consider the potential impacts of development on heritage assets.

### Local Planning Policy - The Development Plan

6.29 The site lies within the jurisdiction of Fenland District Council and the development plan for the area is the Fenland Local Plan that was adopted in May 2014, (FLP). The following policies are considered to be relevant:

- LP1: A Presumption in Favour of Sustainable Development
- LP2: Facilitating Health and Wellbeing of Fenland Residents
- LP3: Spatial Strategy, the Settlement Hierarchy and the Countryside
- LP6: Employment, Tourism, Community Facilities and Retail
- LP14: Responding to Climate Change and Managing the Risk of Flooding in Martin
- LP16: Delivering and Protecting High Quality Environments Across the District
- LP19 The Natural Environment

### Emerging Local Plan, (ELP)

6.30 Fenland District Council is currently preparing a new Local Plan and early consultation on the Draft Plan took place in August 2022. The feedback has been considered by the Council and they are now progressing the Draft Plan to the next stage. A Proposed Submission version of the Local Plan was due to be published in Summer 2023, but this has not occurred to date. Given the early stage of the plan preparation, it is considered that the policies only carry limited weight in decision making. Of relevance to this application are policies:

- LP1: Settlement Hierarchy
- LP5: Health and Wellbeing
- LP6: Renewable and Low Carbon Energy Infrastructure
- LP7: Design
- LP17: Culture, Leisure, Tourism and Community Facilities
- LP20: Accessibility and Transport
- LP22: Parking Provision
- LP31: Open Space and Recreational Facilities 101
- LP32: Flood and Water Management

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## Neighbourhood Plans

6.31 There are no Neighbourhood Plans that cover this area.

## Supplementary Planning Documents (SPD's)

- Delivering and Protecting High Quality Environment in Fenland Supplementary Planning Document Adopted July 2014
- Cambridgeshire Flood and Water Supplementary Planning Document 2016

## 7 Consideration of the Main Issues

7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the development plan unless material considerations indicate otherwise. The key planning policies and national guidance have been identified and reviewed and the issues that are considered relevant to the determination of the application as follows:

- Principle of development including the need for the development
- Siting and Design
- Impact on residential amenity
- Transport and Construction
- Loss of playing field
- Ecology, Biodiversity and Trees
- Heritage
- Flooding
- Sustainability
- Lighting
- Noise

7.2 Each of these matters will be considered in turn.

### Principle of development including the need for the development

7.3 The application site lies within Benwick which is classified as a 'Small Village' under Policy LP3, (a medium village in the emerging LP. This policy sets out that in small villages development should be limited in scale and considered on its merits. The site is in educational use and the proposal seeks to provide improved facilities at the school for the existing pupils. There will be no increase in pupil or staff numbers. The County Council has confirmed that the pupil numbers are likely to remain consistent over the forthcoming years and there is a need to replace the existing modular building which is several years old, with a permanent structure. The proposal would therefore support the



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provision of community facilities within the village and modernise the existing buildings at the school and therefore represents an overall benefit to the community.

7.4 The proposal is therefore considered acceptable in principle and is supported by guidance within the NPPF that seeks to support the expansion and alterations to existing schools and improvements to social and community facilities. It is acknowledged that education is an important part of wellbeing, not only for pupils but a school also acts as a social point for the wider community. The replacement building would improve the teaching environment for pupils and staff and ensure that existing pupils can remain at the School. Policy LP1 and LP2 of the Local Plan also reflect these aspirations and seek to ensure sustainable development and facilitate development that would support the health and wellbeing of Fenland Residents.

#### Siting and Design

7.5 The siting and design of the proposed building has been carefully considered to ensure that it integrates with the current school and would not adversely impact the playing fields and hard surface play areas at the school. The optimum siting is therefore to replace the building in its current location. This submission is accompanied by a Design and Access Statement that expands on these points and should be read alongside this Planning Statement.

7.6 The existing modular structure is a flat roofed and buff in colour. The proposal has been designed with a mono-pitch to allow for the installation of solar panels and to assist with drainage. There would be a brick base to the building with external self-coloured cladding panels for the main elevations. A dark green colour has been selected as the background of this part of the site is formed by a row of trees that overhang from adjoining residential properties. The proposal is set back a significant distance from the street scene and is only visible from the public domain from views directly outside of the school. The siting will not change but the visual impact of the building responds to the current context and is considered to make a positive contribution to the appearance of the street scene. The following images show the existing appearance of the modular building and proposed permanent replacement building.

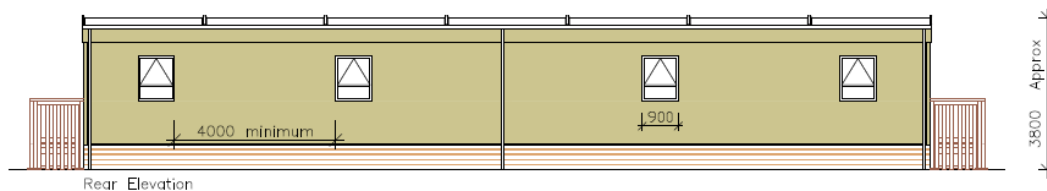


7.7 The proposed building fronts the hard play area for pupils and is consistent with the current arrangement and ensures the replacement building continues the relationship with the main school building that currently exists. This is important to retain the functional operations of the school and not have a long-term impact on the hard and soft play areas available for pupils. The building includes a variety of glazed elements to ensure natural light enters the classrooms. The main doors and windows would be on the front elevation of the building as existing with a reduced number on the rear elevation.

7.8 The proposed siting and design of the school building is therefore considered to represent good design and would lead to positive improvements in terms of the teaching environment for pupils and improve the appearance of the street scene with the building harmonizing with its surroundings. The proposal is therefore considered to be in accordance with the NPPF and meets the criteria of Policy LP1 and LP2 of the FLP and LP1, LP5, LP7, LP17 of the ELP.

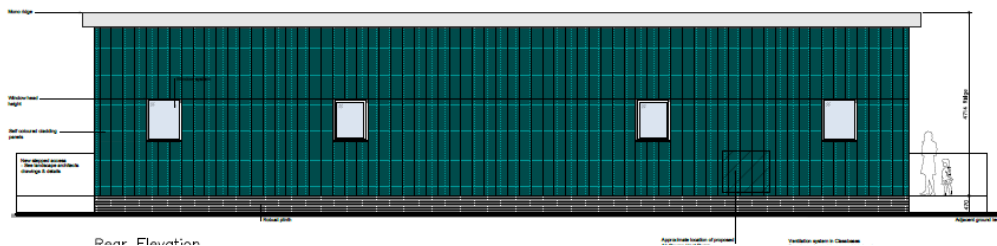
**Impact on residential amenity**

7.9 Policy LP2 of the LP seeks to promote a high level of residential amenity and Policy LP16 point e) states that development should “... *not adversely impact on the amenity of neighbouring users such as noise, light pollution, loss of privacy and loss of light.*” The proposal is sited in the same location as the existing structure and is single storey in nature. There are existing windows in the rear elevation of the modular building as shown in the following elevation.



Extract – Architect’s Drawing

A similar arrangement is proposed in the new building as shown below:



Extract – Architect’s Drawing

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7.10 The submitted drawings demonstrate that the current proposal would retain the status quo. The proposed building remains single storey and with the current boundary treatment there would be no adverse impact on the amenity of occupiers of adjoining dwellings that back on to the School site. The proposal is therefore considered acceptable having regard to the guidance within the NPPF and the policies within the FLP and the ELP.

#### Transport and Construction

7.11 The proposal would not lead to an increase in pupil or staff numbers at the school and it is not intended to provide any additional vehicle or cycle parking at the site. There are no permeant changes to the existing pedestrian or vehicle access points for the school. The existing vehicle parking will be remarked to show the available spaces more clearly. A meeting was held with the County Highway Authority on 22 September 2023 where they confirmed that a Transport Statement would not be required to support the application. However, a Construction Environmental Management Plan (CEMP) was requested. This has been prepared and accompanies this submission.

7.12 The CEMP confirms that during construction a temporary haul road would be used to access the site from Cambridge Row. Various access options have been considered but the school needs to remain operational throughout the construction phase. If the main access from the High Street was used, the existing school parking and pedestrian access points would be disrupted. The most appropriate temporary solution has therefore been developed and the CEMP includes hours of operation, noise and vibration management, construction techniques detailed, how noise may be controlled if necessary and a monitoring and complaints management process. Whilst there may be some disruption during the construction works, these will be minor due to the overall size of the proposal and the CEMP has sought to minimise this impact. In summary the CEMP confirms the following:

- Operating hours from 08:00 to 17:00, Monday to Friday, and 08:00 to 13:00 on Saturdays, with prior agreement with the client.
- Intended site set up, May 2024 and completion October 2024
- Controlled delivery times to avoid pickup and drop off times for pupils
- Management system in place with traffic marshals where necessary
- Wheel washing facilities would be provided
- Measures to reduce noise and vibration during construction
- Control of site dust
- Protection measure for ecology

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7.13 The proposal is therefore considered acceptable in relation to the guidance within the NPPF and local planning policies LP2 and LP16 of the FLP and Policies LLP 20 and 22 of the ELP.

#### Loss of playing field

7.14 The submitted drawings show that the construction access and compound will be located on part of the existing playing fields. This will only be on a temporary basis and the areas in use during this period will be returned to their previous condition on completion of the works. The playing field is large enough and would be sectioned off to provide the secure construction compound and the remaining land would be available to the school for recreational provision. The landscape drawings have demonstrated that a football pitch could still be accommodated on the site. As the loss of playing pitch would only be temporary and the land returned to its former condition, the proposal is considered acceptable.

#### 7.15 Ecology, Biodiversity and Trees

7.16 The application is accompanied by a Preliminary Ecology Appraisal, (PEA), a Biodiversity Check List, Biodiversity net gain calculations, landscape drawings and an Arboricultural Report, (AR). The PEA confirms that the replacement building would not lead to any adverse impacts and no further ecology surveys will be required. In relation to ecological enhancements, this proposal is minor development and the replacement of an existing structure. However, the opportunity is being taken to make certain improvements that include landscape works, four bird boxes, two bat boxes and two informal deadwood hibernacula. Due to the small-scale nature of the works it is not considered that a Landscape and Ecological Management Plan (LEMP) is necessary in this case.

7.17 In relation to trees, one pear tree would need to be removed to accommodate the site access and a replacement is proposed as shown on the landscape drawings. The existing trees that overhang the site from the dwellings that front Old West Estate would be pruned in accordance with the normal maintenance program and the standards within BS5837:2012. In relation to the temporary haul road, this has been sited to avoid the existing trees along the boundary. Where there is an encroachment on the root protection area, temporary ground protection measures would be provided. A total of 2 new trees would be planted along with an ornamental flower bed. A new wildflower grassland is also intended around the sports pitch as shown on the landscape drawing that would assist in bio-diversity net gain on the site. The proposal has therefore considered the existing ecological features on the site and would provide appropriate protection where required and increase the biodiversity on site as demonstrated in the landscape drawings that accompany this submission. The proposal therefore provides appropriate mitigation in line with the requirements of the guidance within the NPPF and policies LP 16 and 19 of the FLP.

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## Heritage

- 7.18 The site is not situated within a conservation area or near to any listed buildings and therefore there would be no impact on heritage assets in the area.

## Flooding

- 7.19 The application is accompanied by a Flood Risk Assessment and Drainage Strategy, (FRADS). The entire village of Benwick lies within both Flood Zones 2 and 3 and there are no other alternative locations identified to place the extension with a lesser flood zone rating within 1km of the school. However, the Environment Agency Flood Maps also shows that the school site benefits from flood defences. Pre-application discussions have taken place with the Lead Local flood Authority, (LLFA), as the ground conditions are not suitable for soakaways. Alternatives have been discussed and an approach agreed with the LLFA. A copy of the response is attached at Appendix 3.
- 7.20 The FRADS has therefore demonstrated a suitable approach with appropriate flood risk management and safety measures that meet the requirements of Policy LP14 of the FLP and the guidance within the NPPF.

## Sustainability

- 7.21 The Design and Access Statement includes a section on sustainability and the application is also accompanied by an Energy Statement. The proposal is being designed in accordance with CCC's requirements and would exceed Part L 2A of the Building Regulations with a focus on fabric first and air permeability performance of the building. In Section 5 of the DAS it confirms that the "*... energy efficiency of the building is further enhanced by the implementation of hybrid ventilation heat recovery units (HVRs) in the classrooms and a mechanical ventilation heat recovery unit (MVHR) that serves the cloak room and WCs.*" An air source heat pump would provide heating and hot water and four roof mounted photovoltaic panels would provide a supplementary renewable energy electricity supply to the building. Overall, the proposal seeks to achieve an overall BREEAM rating of "Very Good" and meets the necessary guidance in the NPPF and the policies within the FLP and ELP.

## Lighting

- 7.22 The school is situated within the settlement boundary and there is existing lighting across the site. There will be new lighting for safety reasons for access to the classrooms and this reflects the current situation on the site. The lighting will be directional and there will be no material change to on-site conditions.

## Noise

- 7.23 The application is accompanied by an Acoustic Report that considers indoor ambient noise levels, (IANL), control of rain noise, sound insulation of walls, reverberation times and absorption and

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mechanical plant noise. The report concludes that the appropriate Building Bulletin 93 standards would be met and Section 3 refers specifically to planning. In this case a modern and solid construction building would be erected and this represents an improvement on the current situation on site. and the proposal is therefore considered acceptable. The proposal is therefore considered acceptable having regard to the guidance within the NPPF and the policies within the FLP and the ELP.

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## 8 Conclusions

- 8.1 This Planning Statement has been prepared by LSA Planning on behalf of R G Carter to support a full planning permission on behalf of Cambridgeshire County Council for the replacement of the existing modular classroom on the site. The proposal is supported by a variety of technical reports that confirm the proposal is acceptable and would meet the necessary guidance within the NPPF in particular paragraph 95 that recognises the need to ensure that there is sufficient choice of school places to meet the needs of existing communities and states that great weight should be given to the need to create, expand or alter schools through the preparation of plans and decisions on applications.
- 8.2 The proposed development would bring benefits to the education for pupils in the area with a permanent modern well-designed classroom building. The biodiversity on the site would also be improved leading to a positive impact.
- 8.3 The current proposals therefore represent sustainable development and the application is supported by evidence to confirm that the proposal is acceptable in all regards. The Council is therefore requested to grant planning permission for the development.

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**Appendix 1 -  
Pre-Application  
feedback -  
County  
Planning**



My ref: CCC/23/122/PAR3 (CCC/22/106/PAR3)

Date: 24 November 2023

Contact: Debra Creek

Telephone: 07388 371246

E Mail: [Debra.creek@cambridgeshire.gov.uk](mailto:Debra.creek@cambridgeshire.gov.uk)



**Place and Sustainability  
Planning, Growth & Environment**

Lisa Skinner  
LSA Planning Ltd

By email only to:  
[lisaskinner@lsaplanning.co.uk](mailto:lisaskinner@lsaplanning.co.uk)

**Box No ALC2613  
New Shire Hall  
Emery Crescent  
Enterprise Campus  
Alconbury Weald  
PE28 4YE**

Dear Ms Skinner

**Re: CCC/23/122/PAR3: Pre-application advice request for a meeting and follow-up written advice.**

**Proposed Development: Removal of the existing modular classroom building, erection of a permanent single storey classroom building with Air Source Heat Pump (ASHP), internal refurbishment works to the main school building and temporary contractor's compound.**

**At: Benwick Primary School, High Street, Benwick, March, Cambridgeshire, PE15 0XA.**

Please find below the Authority's written advice following on from a meeting held with officers on 25<sup>th</sup> October 2023.

Your original request for pre-application advice (our reference CCC/22/106/PAR3) was received on 22<sup>nd</sup> September 2022, and then resubmitted on 5<sup>th</sup> October 2023, the application comprised the following:

- Covering Letter
- Application Form
- Existing and Proposed Plans
- Fire Engineer Report
- Flood Risk Assessment
- Local Validation List
- Noise Survey and Acoustic Impact Assessment
- Preliminary Ecology Report
- Topographical Survey
- Tree Survey Drawing and Tree Survey
- Fee of £326.00 received 27 September 2022 (transferred from reference CCC/22/106/PAR3).

## Scope of the advice

The following aspects of the proposal were discussed at the meeting as requested. This response formalises our discussions and also provides additional information in respect of your request.

The key points discussed at the meeting were:

- The principle of the development
- The siting and design of the building, including materials
- Access, vehicle and cycle parking provision, and
- the scope of technical reports required to support the planning application.

Your client is strongly advised to seek further advice on the proposals directly with Fenland District Council in relation to the impacts on trees, design of the building and potential noise impacts. Separate advice should also be sought in respect of highway safety during the construction and demolition phases, as well obtaining as advice on flood risk and drainage, and ecology from the relevant Cambridgeshire County Council (CCC) specialist teams. Further information on the charges related to this specialist advice is contained out Pre-Application Advice Charging Guide which can be found via this link: [Submitting a planning application - Cambridgeshire County Council](#). Where this letter relates to these matters it will be limited to the general planning aspects and should not be taken to constitute the County Council's comprehensive advice.

## The Site and Surroundings

Benwick Primary School is located within the village boundary and built-up area of Benwick, south of the B1093 between Doddington and Whittlesey within the administrative District of Fenland District Council.

The existing temporary classroom building is located within the grounds of the school, to the west of the main school buildings and playground.

The main vehicular access and car parking area for the school is provided off the High Street to the east. There is also a vehicular access to the playing field along Cambridge Row. The site is bounded on all sides by residential dwellings along the High Street, Green Lane, Cambridge Row, Old West Estate and Ramsey Road.

In terms of site the constraints, the site is located within flood zones 2 and 3a. The Flood Maps show that the site benefits from flood defences and is located within an attenuation area designated by the Middle Level Commissioners. The nearest and only designated heritage within the village of Benwick is Benwick War Memorial, a Grade II Listed Building located approximately 135m (as the crow flies) to the north of the site. The proposed replacement building is not considered to impact on the setting of this heritage asset given its proposed location to the rear of the school site.

## **The Proposed Development**

The proposal seeks to replace the temporary two bay classroom with a permanent and more energy efficient two bay classroom building comprising ASHP and solar panels.

The floor area of the proposed classroom is shown measuring 152 square metres and includes two classrooms, a cloakroom, WC's, and a plant and cleaners' area. The proposed plans show a permanent building with a mono pitch roof with an eaves height of 3.6m and a ridge height of 4.93m. The building is proposed to be finished externally with cladding panels (which does not appear to be used elsewhere within the site) UPVC windows and doors. Access into the building will be via stepped access points to the classrooms at each end of the building and a new ramped access to the front of the building however, no details of their design or finish were provided. The proposal also includes details of a new play area with shrub and tree planting and a 2m wide wildflower planting strip.

The development would require a temporary contractor's compound to be provided within the playing field for the duration of the construction. Access for the works would be provided via the existing access to the school off Cambridge Row, with the existing sports pitch temporarily repositioned to allow its continued use by the school during the demolition and construction phases of the development.

The proposal would not result in an increase of school places or the need for additional parking spaces and would replace a temporary two bay classroom with a building of a similar scale in the same location.

### **Relevant planning history (source: Fenland District Council and CCC records)**

CCC/21/032/VAR - Retention of 7 bay 21m x 8.7m approx. mobile classroom building on existing Primary School site for a temporary period. Informative: Section 73 application to develop land without complying with condition 3 of planning permission F/2007/16/CC to extend the temporary period until 31 August 2024 - Approved 25 June 2021. For a temporary period until 31 August 2024.

CCC/21/031/NMW - Non-Material Amendment application to change the description of planning permission F/2007/16/CC to Retention of 7 bay 21m x 8.7m approx. mobile classroom building on existing Primary School site for a temporary period - Approved 29 March 2021.

F/2007/16/CC - Removal of existing mobile classroom building, and erection of 7 bay 21m x 8.7m approx. mobile classroom building on existing Primary School site until 31 August 2021 - Approved 6 July 2016.

F/2004/15/CC - Variation of Condition 1 of planning permission F/2007/10/CC to allow retention of mobile classroom until 31 August 2020 - Approved 25 August 2015.

F/00397/00/CC - Erection of One 3-bay Mobile Classroom - Approved 24 July 2000. Expired on 31 July 2003.

## National Planning Policy and Guidance

### National Planning Policy Framework (July 2023) (NPPF)

The NPPF, sets out the Government's planning policies and how local planning authorities are expected to apply them. It promotes the central government objective of sustainable development. The following paragraphs within the NPPF are considered to be relevant to this enquiry:

Paragraph 11. Plans and decision should apply a presumption in favour of sustainable development. For decision-taking this means:

- c) approving development proposals that accord with an up-to-date development plan without delay; or
- d) where there are no relevant development plan policies, or the policies which are most relevant 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 of this Framework taken as a whole."

Paragraph 95 - 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 school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.

Paragraph 111 - Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Paragraph 126 - Achieving Well Designed Places - The creation of high quality, beautiful and sustainable 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. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective

engagement between applicants, communities, local planning authorities and other interests throughout the process.

Paragraph 130 – Planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development.
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping.
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) create places that are safe, inclusive and accessible and which promote health and wellbeing, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Paragraph 131- Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined<sup>50</sup>, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.

Paragraph 159 - Planning and Flood Risk - Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

Paragraph 168 – Applications for some minor development and changes of use should not be subject to sequential or exception tests but should still meet the requirements for site specific flood risk assessments set out in footnote 55.

Footnote 55 – A site specific flood risk assessment should be provided for all developments in flood zones 2 and 3. In flood zone 1, an assessment should accompany all proposals involving sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use.

Footnote 56 - This includes householder development, small non-residential extensions (with a footprint of less than 250m<sup>2</sup>) and changes of use; except for changes of use to a caravan, camping or chalet site, or to a mobile home or park home site, where the sequential and exception tests should be applied as appropriate.

Paragraph 174 - Conserving and Enhancing the Natural Environment - Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate.
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Paragraph 180 - Habitats and Biodiversity - When determining planning applications, local planning authorities should apply the following principles:

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts),

adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.

- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest.
- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons, and a suitable compensation strategy exists; and
- d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

The Planning Practice Guidance 2021 and the National Design Guide 2021 are also a material consideration.

### **Relevant Local Plan Policies**

The Development Plan comprises:

- The Fenland Local Plan (May 2014) [Development Plan - Fenland District Council](#),
- 'made' Neighbourhood Plans

Adopted Supplementary Planning Documents (SPD's):

Fenland Infrastructure Delivery Plan

Cambridgeshire Flood and Water

Delivering and Protecting High Quality Environments in Fenland

Resource Use and Renewable Energy

Fenland Local Plan (8th May 2014) (FLP) Policies:

LP1: A Presumption in Favour of Sustainable Development

LP2: Facilitating Health and Wellbeing of Fenland Residents

LP3: Spatial Strategy, the Settlement Hierarchy and the Countryside

LP12: Rural Areas Development Policy

LP14: Responding to Climate Change and Managing the Risk of Flooding in Fenland

LP15: Facilitating the Creation of a More Sustainable Transport Network in Fenland

LP16: Delivering and Protecting High Quality Environments Across the District

LP19: The Natural Environment

## Fenland District Council's Emerging Local Plan

Fenland District Council is currently preparing a new Local Plan. Once adopted, it will replace the currently adopted Fenland Local Plan (May 2014). The District Council has consulted on the Draft version of the Local Plan between 2022 and 19 October 2022. Given that the preparation of the Local Plan is still at an early stage, the emerging plan can be afforded limited weight.

### Neighbourhood Plans

Benwick is currently not designated as a Neighbourhood Area and therefore, does not have a Neighbourhood Plan. Benwick shares a boundary with the parish of Doddington, the whole of which is a designated Neighbourhood Area.

### **The Principle of the Development**

The proposal seeks to replace the existing double mobile classroom building with a permanent building. Paragraph 95 aims to ensure that a sufficient choice of school places is available to meet the needs of existing and new communities.

The existing two bay classroom is located on the existing school site. The applicant's covering letter, dated 5 October 2023 states that as of January 2021 there were 103 pupils on roll, organised into four classes. The current forecast for primary aged children in the area is predicted to remain between 90 – 100. The proposed replacement of the temporary classroom building with a permanent classroom building will enable the school places to continue to be provided in the medium and long term.

Benwick is classified as a 'Small Village under Policy LP3 of the FLP, which states that development in small villages should be limited in scale.

The proposal is limited in scale replacing an existing temporary school classroom building on a similar footprint and there is a clear demand for the retention and future provision of school places. The proposal is therefore considered to meet the aims and objectives of the NPPF, Policy LP1, LP3, LP12 of the FLP and would be acceptable in principle, subject to the other material considerations set out in the following paragraphs.

### **Design, Siting, Materials and Landscaping**

The main school building was constructed in the 1870's, a Victorian building with architectural features comprising stone mullion windows, buff brick with red feature bricks and prominent gables. It is understood that the design of the proposed replacement building will contrast with the traditional existing buildings and is of a modern design, finished with neutral composite panels and large glazing creating a separate identity.

Concerns were raised in the meeting that the proposed design still had the feel of a temporary building with its vertical panels and removable ramp. It is unfortunate that it



is not proposed to translate some of the historic design features of the existing building into design aspects of the new building in some small way which would help the building connect visually and thematically to its surroundings. However, it is accepted that the modern design will clearly be read as a new addition, separating the old buildings from the new. The replacement building will also be sited at the rear of the site where it will not detract from or dominate public views. It is recommended that any subsequent planning application should provide details of the proposed materials and finishes.

The proposed siting of the building is constrained by the location of the mains water no build zone which runs in front of the existing temporary building, there are also well-established trees to the rear of the building within the rear gardens of the neighbouring properties and the site provides little opportunity for the building to be re-sited.

The submitted information shows that the canopy of the trees will need to be trimmed to make way for the building and there are some concerns over the potential impacts of the development on the root protection areas of these trees. The applicant is strongly advised to seek further advice from the specialist tree officer at Fenland District Council in this regard, prior to submission of a formal application.

The additional planting areas that are proposed are welcomed, any application should demonstrate existing landscaping and proposed landscaping clearly so that a biodiversity net gains (BNG) can be achieved where possible (in accordance with Paragraph 170(d), 174(b) and 175 (d) of the NPPF. Please note that currently under the Environment Act 2021, all planning permissions granted in England (with a few exemptions) except for small sites will have to deliver at least 10% biodiversity net gain from January 2024. BNG will be required for small sites from April 2024.

Consideration should be given to the location of the ASHP(s) and any enclosures required to ensure that they are not a prominent feature.

Overall, the replacement of the temporary building with a new permanent modern building and additional planting could improve the overall appearance of the school site. Full consideration of the design would be undertaken in consultation with Fenland District Council, should an application be submitted to ensure the proposals are in accordance with Policies LP1, LP2, LP12 and LP16 of the FLP.

### **Access, Vehicle and Cycle Parking**

FLP Policy LP15 seek to ensure that well designed, safe and suitable access to the site can be achieved for all users of the development. This aim is reinforced within the NPPF.

The submitted information states that the current car park will be resurfaced and marked out new fence and gates installed, however, it was confirmed at our meeting that no changes are proposed to the existing parking arrangements.

The school site provides parking for 7 vehicles for the use of staff only. The proposal seeks a replacement two bay classroom and will not result in additional pupil or staff

numbers or changes in terms of the existing parking facilities or need for additional parking.

During the meeting, the temporary construction compound and its location within the sports field was discussed, as was the construction access that will be provided off Cambridge Row. In terms of the temporary relocation of the sports pitch, Sport England would be consulted on any future planning application, and their comments taken into account as part of the assessment. Officers recommended that a Construction Environmental Management Plan (CEMP) should be submitted with the application detailing how the site will mitigate its potential impacts throughout the demolition and construction phases of the development and the CEMP should cover contractors parking and access arrangements, working and delivery hours, waste disposal and details of the construction compound itself.

As the development is due to take place alongside the normal functioning of the school, details will need to be provided alongside the CEMP, in that the document will need to address any health and learning effects on children and adults during the development phases e.g. from noise, dust, how the continued use of the playing field by the school will be safely managed and how deliveries and construction traffic will be managed at peak pick up and drop off times.

The transport, highway safety/parking aspects, environmental and public health impacts will be assessed fully at application stage.

Based on the information submitted it is not known whether or not the existing visibility splays at Cambridge Row would be adequate for construction and delivery vehicles. The visibility splays would need to be shown on a dimensioned drawing with vehicle tracking. Without the Highway Authority's advice, I am unable to offer any informal opinion on whether or not the proposed development would comply with FLP Policy LP15 in terms of highway safety.

### **Residential Amenity**

Policy LP16 of the FLP seeks to ensure (amongst other things) that developments do not adversely impact on the amenity of neighbouring users in terms of noise, light pollution, loss of privacy and loss of light.

The site is located in close proximity to neighbouring properties which could be affected by the development. A planning application would need to demonstrate that sensitive receptors would not be adversely affected during any of the phases of the development and should include mitigation where necessary.

The principle of siting a classroom in this location has already been accepted and operational noise is not expected to change significantly. As discussed, the building will be served by Air Source Heat Pump(s) and details should be provided of its technical specifications, alongside plans showing its proposed location in relation to the nearest receptors, as well as a noise assessment. These aspects of the development will be assessed as part of the formal application process in consultation with Fenland District Council's specialist officers. It is strongly advised that you seek their professional advice prior to the submission of a formal planning application.

## **Flood Risk, Drainage and Climate Change**

The entire village of Benwick lies within flood zone's 2 and 3a. The flood maps also show that the school site benefits from flood defences. The location has been accepted for the siting of a four-bay mobile classroom since 2010 albeit on a temporary basis and as there are no other available areas within the site at a lower risk of flooding and given the identified need for development at this location, it is considered that the proposal would pass the sequential test.

The proposal is considered to be a minor development creating less than 250 square metres of floor space. A site-specific flood risk assessment must be completed to demonstrate appropriate flood risk management and safety measures to ensure the proposal meets the requirements of the NPPF, and FLP Policy LP14.

It was noted from the consultee comments submitted within previous applications that one of the main considerations in the determination of an application for the proposed classroom would be to ensure that the development does not raise flood risk elsewhere. Previous applications for the temporary classrooms incorporated design features to ensure that surface water run off would infiltrate the footprint area of the building creating an additional impermeable surface. Further advice should be sought directly from the Environment Agency and Cambridgeshire County Council Lead Local Flood Authority (LLFA) and the Emergency Planning Management Team.

### **Conclusion**

It is considered that for the reasons given above the proposal could gain officer support. However, this is an officer view given on the basis of the information provided, without the input of statutory consultees and without prejudice to any decision Cambridgeshire County Council as the County Planning Authority may reach should an application for planning permission be submitted.

*Validation - The scope of technical reports required to support the planning application.*

An application must, of course, comply with the national requirements which can be found at [Making an application - GOV.UK \(www.gov.uk\)](https://www.gov.uk). In addition it will need to meet the requirements of the County Council's Local Validation List Requirements (June 2023) which, together with accompanying guidance documents and the Statement of Community Involvement, can be found at: [Submitting a planning application - Cambridgeshire County Council](#)

As discussed at the meeting, the application should be accompanied by (numbers follow the Local Validation List).

1. Planning statement (PS) – to include details of community involvement and sustainability statement.
2. Local authority development Regulation 3 letter.

4. Biodiversity survey and report.

6. Tree Survey and arboricultural assessment/report.

7. Site specific flood risk assessment.

7A. Surface water drainage strategy and foul water drainage strategy, incorporating sustainable drainage systems (SuDS);

10. Landscape proposals – including references to wildflower meadow and BNG, temporary pitch arrangements and reinstatement of playing field following completion of works.

11. Landscape and Biodiversity enhancement management scheme (to secure biodiversity net gain).

13. Parking and access arrangements for the temporary construction compound (or included within the CEMP).

13A. Construction environmental management plan, incorporating the areas covered above.

15. Noise Assessment – to include details of ASHP(s) construction noise mitigation.

22. Plans and drawings –

- (i) including section to show relationship with neighbouring properties (fencing, cill heights and finished floor levels and distances) position of ASHP(s)
- (ii) Simplified elevations showing eaves and ridge height
- (iii) Colour image of elevation to show finish/design/materials.

Other documents/information that would be helpful but not a validation requirement:

- Up to date travel plan
- Final details of materials, specifications including colours and finish
- Details of any renewable/energy saving measures

I trust the above is of assistance.

Yours sincerely



Deborah Jeakins  
Business Manager, County Planning, Mineral and Waste

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**Appendix 2 -  
Pre-Application  
feedback –  
Highway  
Authority**

**From:** Shane Luck <[Shane.Luck@cambridgeshire.gov.uk](mailto:Shane.Luck@cambridgeshire.gov.uk)>  
**Sent:** Monday, October 23, 2023 10:23 AM  
**To:** Jo German She/her <[Jo.German@cambridgeshire.gov.uk](mailto:Jo.German@cambridgeshire.gov.uk)>  
**Cc:** lisa skinner <[lisaskinner@lsaplanning.co.uk](mailto:lisaskinner@lsaplanning.co.uk)>  
**Subject:** Benwick Primary School

Hello Jo,

Following on from our meeting on the Friday 22<sup>nd</sup> September, I can confirm that on the basis that the planning application will be to replace temporary facilities at Benwick with equivalent permanent ones, thus resulting in no intensification, I will not require any alterations to the access nor off-site works. I will however require a construction traffic management plan to be included in the planning submission.

Kind regards,  
Shane

**Shane Luck BEng MSc**  
**Principal Highway Development Management Engineer | Place and Sustainability**  
**Cambridgeshire County Council**  
Mobile: 07765 587615  
Address: East Highway Division, Stirling Way, Witchford, Ely, CB6 3NR



[Highways development - Cambridgeshire County Council](#)

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**Appendix 3 -  
Pre-Application  
feedback –  
Lead Local  
Flood Authority**

**Our ref:** PREFR/23-000032  
**Your ref:** Benwick Primary School  
**Date:** 21/11/2023  
**Doc no:** 201109962  
**Officer:** Benjamin Woolf  
**E Mail:** Benjamin.Woolf@cambridgeshire.gov.uk



**Executive Director: Frank Jordan**  
**Place and Sustainability**  
**Historic & Natural Environment**

Lisa Skinner  
LSA Planning  
Stirling House, Cambridge Innovation Park  
DENNY END ROAD  
Waterbeach  
CB25 9PB

New Shire Hall  
Emery Crescent  
Enterprise Campus  
Alconbury Weald  
PE28 4YE

**PROPOSAL: Benwick Primary School, High Street, Benwick, March, Cambridgeshire**

Dear Lisa,

Thank you for your pre-application meeting with the Flood and Water Team at Cambridgeshire County Council on Thursday the 16<sup>th</sup> November 2023 in relation to Benwick Primary School, High Street, Benwick, Cambridgeshire.

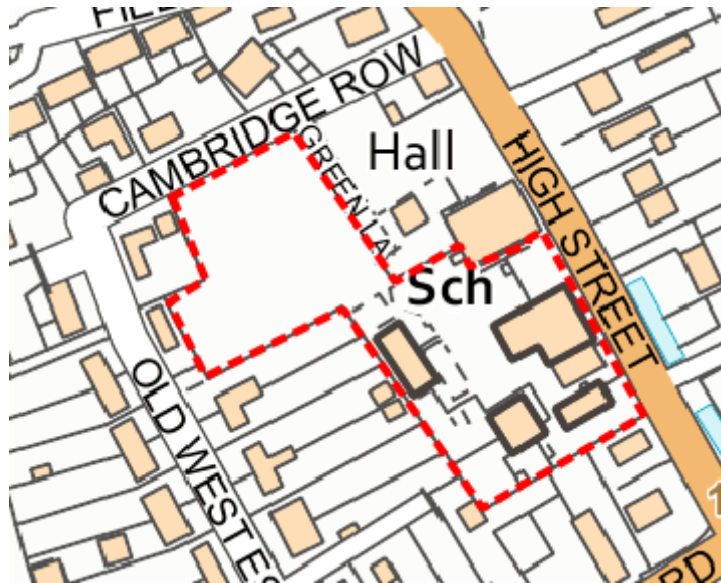
As Lead Local Flood Authority (LLFA), Cambridgeshire County Council has a lead responsibility for managing the risk of flooding from surface water. Responsibility for managing the risk of flooding from main rivers, reservoirs, estuaries and the sea remains with the Environment Agency (EA); therefore, our response focuses on surface water management in relation to the above proposed development.

We have prepared the below advice from the documents provided to the LLFA for the approximate site boundary in Figure 1. This report will focus on surface water flood risk and the proposed surface water scheme.

## **1. Introduction**

The site is situated within the boundaries of Benwick Primary School on the site of the existing temporary classroom. The proposals of the development comprise of the construction of a new permanent building on this site. The site is brownfield and surrounded by the hardstanding of the playground.

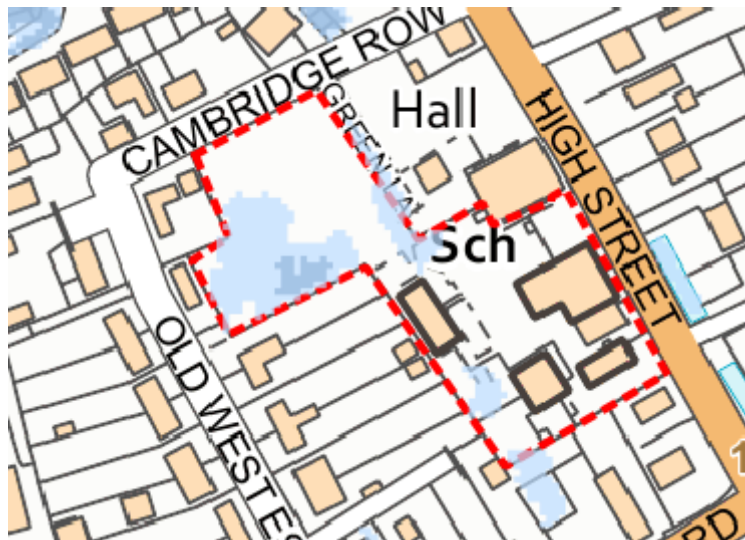




**Figure 1: Site Boundary for Pre-Application Advice**

## 2. Surface Water Flood Risk

The surface water flood risk at the site can be seen in Figure 2, which shows that there is some low and medium risk flooding occurring on the southern boundary of the playing field. As well as the area to the north of the proposed development where it is proposed to discharge surface water.



**Figure 2: Surface Water Flood Risk Mapping (Source: GOV.UK)**

### 3. Local Watercourses

The nearest watercourse is around 75m to the south of the site and is an IDB drainage ditch belonging to the Benwick Internal Drainage Board. The River Nene Old Course runs around 400m north of the site.

It should be noted that the LLFA does not support the culverting or in-filling of ditches within developments and would request that the site layout is designed with any existing water features in mind. This is due to the increase in flood risk to the upstream environment associated with in-filling and culverting of water courses.

The site layout should account for the existing drainage infrastructure, ensuring clear access for maintenance of all components of the drainage system by a management body. This should include a suitable easement for any maintenance equipment that may be required for future maintenance works.

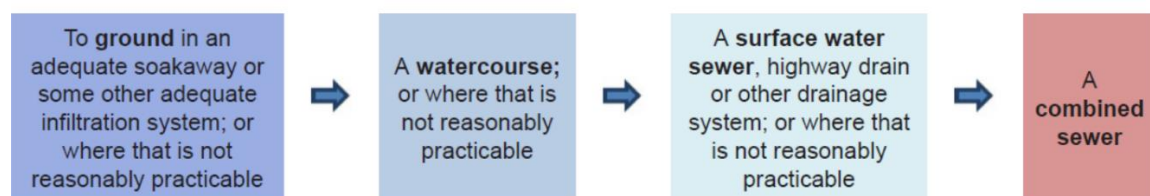
Constructions or alterations within an ordinary watercourse (temporary or permanent) require consent from the Lead Local Flood Authority under the Land Drainage Act 1991. Ordinary watercourses include every river, drain, stream, ditch, dyke, sewer (other than public sewer) and passage through which water flows that do not form part of Main Rivers (Main Rivers are regulated by the Environment Agency). The applicant should refer to Cambridgeshire County Council's Culvert Policy for further guidance:

<https://www.cambridgeshire.gov.uk/business/planning-and-development/water-minerals-and-waste/watercourse-management/>

Please note the council does not regulate ordinary watercourses in Internal Drainage Board areas.

### 4. Surface Water Drainage Strategy

As required by the building regulations and Planning Practice Guidance, surface water must discharge to the following, listed in order of priority:



In the applicant's case the proposed surface water drainage strategy involves the discharge of surface water via rain garden planters onto the playing field. This replicates the existing method.

#### **4.1. Infiltration**

Infiltration is the first choice for surface water disposal. The results of infiltration testing, in accordance with BRE365, should be provided as part of any formal planning application in order to demonstrate that the method of surface water disposal has followed the above Surface Water Disposal Hierarchy.

Infiltration testing performed at the site shows that infiltration is not a viable option for surface water disposal.

If infiltration is not a feasible means of surface water disposal, the applicant must consider discharging all surface water to a watercourse.

#### **4.2. Discharge to Watercourse**

Discharging to the nearest watercourse in this case the IDB drain to the south is not possible due to the presence of third-party land between the development site and the drain. The construction of a surface water sewer for the length of the road down to the drain would be very costly and would require third party consent.

In accordance with the Surface Water Disposal Hierarchy, this option needs to be thoroughly explored before the LLFA would accept discharge into a surface water sewer.

If it is proposed to discharge into a watercourse this should be shown on a plan. We will require evidence that the watercourse itself has an outfall and is in a suitable condition to receive surface water. The lack of detailed information on these grounds may increase the level of uncertainty we have about the effectiveness of a drainage strategy. If this degree of uncertainty is great, then as LLFA we would have grounds to object to the drainage proposal.

#### **4.3. Discharge to Surface Water Sewer**

The site has no surface water sewers in the vicinity, the lack of a surface water sewer is an unusual constraint on this site. It is not permitted to discharge surface water into a foul sewer. A connection to a highway gulley was explored given that the school is a council entity however this was denied due to the capacity constraints of the highway gulley.

Any proposed connection to the public sewer will need agreement from Anglian Water. For an outline application, correspondence with the responsible body should be submitted to demonstrate agreement in principle to the discharge and connection point. Anglian Water may require local capacity improvements for sewer connections, or a new sewer may need to be requisitioned to connect to the best point on the network. These should be negotiated with the sewerage undertaker directly.

For any application, correspondence with the responsible body agreeing to accept surface water at an agreed rate should be appended to the surface water drainage strategy.

#### **4.4. Peak Flow Control**

Runoff from the site must mimic natural drainage as closely as possible. As the new development will be located on a brownfield site, the existing runoff from the site must be reduced as part of the redevelopment. In order to provide betterment, redevelopments should look to reinstate greenfield runoff rates. By providing retention in the form of rain garden planters betterment will be provided when compared to the existing method of surface water disposal in which waters discharge directly onto the surrounding ground.

Further information on peak flow control can be found in Section 3.3.2 of the CIRIA SuDS Manual (C753).

#### **4.5. Existing and Proposed Runoff Rates**

Calculations for the existing peak runoff rates (l/s/ha) should be provided for the following storm events:

- 100% annual exceedance probability (AEP) (1 in 1)
- 3.3% AEP (1 in 30)
- 1% AEP (1 in 100)

The above information is required to be submitted as part of the formal application to demonstrate that the runoff rate is restricted in accordance with Section 6.3.6 of the Cambridgeshire Flood and Water Supplementary Planning Document (SPD). Consideration should be given to sub-catchments that may exist on site and individual calculations should be provided per sub-catchment where appropriate.

As the proposed method of surface water discharge is onto the playing field via rain garden planters it needs to be shown that this surface water will not overflow and effect the surrounding dwellings/ development. A low to medium risk surface

water flood risk is shown towards the southern border of the playing field so any discharge into this area needs to be avoided.

#### **4.6. Existing and Proposed Runoff Volumes**

Calculations for the existing peak runoff volumes (m<sup>3</sup>/ha) should be provided for the following storm events using FEH rainfall data:

- 100% AEP (1 in 1)
- 3.3% AEP (1 in 30)
- 1% AEP (1 in 100)

It should be noted that, runoff volumes from the developed site will usually increase in comparison to the site in its natural condition; this may increase flood risk in natural receiving systems. Controlling the volume of runoff from the site is therefore vital to prevent flood risk in natural systems. As such, the runoff volume from the development site to any surface water body or sewer in the 1% AEP (1 in 100), 6 hour rainfall event must be constrained to a value as close to the greenfield runoff volume for the same event, but should never exceed the runoff volume from the existing site. Where it is not reasonably practicable to constrain the volume of runoff, the runoff volume must be discharged at a rate that does not adversely affect flood risk.

#### **4.7. Volume Control**

An assessment of the volume of attenuation storage that will be required on site should be produced. This should be based on the 1% AEP plus climate change storm event and allowable discharge rate for the site. The method and volumes of attenuation should be identified and located on a plan of the proposed development. SuDS such as permeable paving, swales, green roofs, attenuation basins and wetlands should be preferred on all development sites ahead of conventional piped drainage measures.

Further information on volume control and the provision of long term storage can be found in Section 3.3.1 of the CIRIA SuDS Manual (C753).

#### **4.8. Exceedance Flows**

The surface water scheme must ensure the level of flood risk from the drainage system is acceptable for the site. For extreme events, the layout of the site should be designed so that any exceedance flows (those flows in excess of what the system has been designed to cater for) are safely managed in conveyance and storage zones.

If any above ground flooding is expected for the 1% annual exceedance probability (AEP) (1 in 100 year) rainfall event including an allowance for climate change, a plan showing the volumes, depths, velocities and extents should be mapped onto a topographical plan of the site (levels on the topographical plan should represent the post-development situation).

Flows that exceed the design criteria must be managed in flow conveyance routes that minimise the risks to people and property both on and off site. Any proposed building which may be affected by these flow routes must be suitably protected and floor levels raised to ensure they are suitably protected for the lifetime of the development.

In this case as the proposed development will replicate the existing buildings drainage method, surface waters will be directed onto the playing field. It needs to be shown that these surface waters will be retained on site or diverted to an area that does not pose a risk to the surrounding dwellings/ buildings.

Further information on exceedance flow routing can be found in the CIRIA Designing for Exceedance in Urban Drainage guide (C635) (2006)

#### **4.9. SuDS**

The site's surface water drainage strategy must give priority to the use of SuDS as this is now a material planning consideration. SuDS are an approach to managing surface water run-off which seeks to mimic natural drainage systems and retain water on or near the site as opposed to traditional drainage approaches which involve piping water off site as quickly as possible. SuDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, ponds and wetlands. SuDS can offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and volume of surface water run-off from a site, promoting groundwater recharge, and improving water quality. SuDS can also be integral in the design and delivery of green infrastructure across a site.

Consideration should be given to surface water drainage from the highway and surface water treatment of these surfaces should also be in line with the principles set out in the CIRIA SuDS Manual.

Due to the constraints of the site as discussed the LLFA are supportive of using rain garden planters to provide additional treatment and retention to a small extent.

Further information on SuDS within new developments can be found in:

- CIRIA SuDS Manual (C753) (2015)
- Code of practice for surface water management for development sites (BS 8582:2013) (2013)
- CIRIA Designing for Exceedance in Urban Drainage (C635) (2006)

#### 4.10. Water Quality

The presence of impermeable areas across a development can increase the risk of pollution entering a watercourse or groundwater and the variability in the level of pollutants arising from urban runoff is great. To protect the quality of receiving water bodies, surface water runoff arising from the site should be of an acceptable quality. This can be achieved through pollution prevention measures, interception, treatment and maintenance.

The LLFA requires that the Simple Index Approach, as outlined in the CIRIA SuDS Manual, is used during the design of the system to ensure that all surface water discharging from the site by any means will receive suitable levels of treatment based on the hazard indices for the proposed land use.

Advice on water quality best practice can be found in Chapter 4 of the CIRIA SuDS Manual (C753).

#### 4.11. Climate Change Allowances

Updated climate change allowances were published by the Environment Agency on 10<sup>th</sup> May 2022 and should be applied for all new developments. The peak rainfall allowances are now provided for [management catchments](#) for both the 1% and 3.3% annual exceedance probability (AEP) rainfall events. The guidance on how to apply peak rainfall allowances has also changed, using the central allowance for development with a lifetime up to 2100 and the upper end allowance for development with a lifetime from 2100 to 2125.

The development is located within the Old Bedford and Middle Level Management Catchment and the climate change allowances for this catchment are shown in Table 1 and 2 below.

<b>3.3% AEP rainfall event</b>		
	Central Allowance	Upper End Allowance
2050s	20%	35%
2070s	25%	35%

**Table 1: 3.3% AEP rainfall event peak rainfall allowances for the Old Bedford and Middle Level Management Catchment**

<b>1% AEP rainfall event</b>		
	Central Allowance	Upper End Allowance
2050s	20%	40%
2070s	25%	40%

**Table 2: 1% AEP rainfall event peak rainfall allowances for the Old Bedford and Middle Level Management Catchment**

For 1% AEP rainfall events, the ‘central estimate’ of 20% should be used for design purposes to assess the performance of the drainage system and ensure it can cope with the critical duration design rainfall event. The ‘upper end’ of 40% should be used in sensitivity analysis to assess the potential flood risk implications both on and off-site in the critical duration design rainfall event. When using the ‘upper end’ figure it must be ensured that surface water is wholly contained on site and that flood hazard is within acceptable tolerances. See [‘Flood Risk Assessment Guidance for New Development’](#) for further information on flood hazard.

Further information on how these changes should be applied can be found at: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

#### **4.12. Maintenance and Management**

In line with the Planning Practice Guidance (PPG), the design of a SuDS system needs to take into account the construction, operation and maintenance requirements of both the surface and subsurface components. An appropriate maintenance plan should be submitted with any planning application which covers the maintenance for the lifetime of the system for all SuDS elements. Such a plan will often be required as a condition of planning permission for a site.

Applicants should sufficiently consider the likely maintenance requirements of new and existing infrastructure, over its design life including the provision of funding. It is important that maintenance is also considered in the design of the drainage system and the development site to account for the requirements of undertaking all stages of maintenance work such as ease of access whether this is for personnel, vehicles or machinery. This should include an adequately sized maintenance strip around open SuDS features such as ponds or basins to allow any machinery of vehicles to be able to access the basin for maintenance. As outlined in the CIRIA SuDS Manual (C753) this would ideally be 3.5m wide and designed to be able to withstand the use of maintenance vehicles. For features that do not require vehicular access for maintenance, should provide adequate and safe access for someone to be able to enter the feature to maintain the structure. For example, shallow side slopes and easy access points.



## 5. Formal Application

Table 3 below, outlines a checklist of information that is required by the LLFA for a full application, which is to be submitted by the applicant at the formal planning application stage. The full details of which can be found within the LLFA's [Surface Water Planning Guidance Document](#).

Information Required	(✓)
Type of development (e.g. new development, extension to existing development, change of use etc.)	
Status of site (i.e. greenfield or previously developed)	
Total site area (ha)	
Existing impermeable area (ha)	
Proposed impermeable area / developable area (ha) including an allowance for urban creep	
Description of site topography	
Description of ground conditions (using site investigation reports where available)	
Existing site drainage arrangements	
Proposed method of surface water disposal (using drainage hierarchy) & evidence to support this	
Existing runoff rates (l/s/ha)	
Proposed runoff rates (l/s/ha)	
Existing runoff volumes (m <sup>3</sup> /ha)	
Proposed runoff volumes (m <sup>3</sup> /ha)	
Total required volume of attenuation (m <sup>3</sup> )	
Appropriate consideration of climate change	
SuDS proposals (type, location, size)	
Water quality	

Drainage layout drawing & supporting hydraulic calculations	
Management/maintenance plan and on-going maintenance responsibilities	
Site layout plans	

**Table 3: LLFA full application requirements**

**Please Note:**

Any advice given is an Officer's opinion based on the information you have supplied and without prejudice it is the right of the Officer to determine as it finds appropriate any subsequent formal application. Therefore, positive feedback in pre-application discussions does not automatically mean that an application will be granted acceptance, however it will increase the likelihood of a successful outcome.

Yours sincerely,

*Benjamin Woolf*

**Benjamin Woolf**  
**SuDS and Flood Risk Officer**

*If you have any queries regarding this application please contact the relevant Case Officer (contact details are above).*