

LUTON BOROUGH COUNCIL
PROPOSED SECONDARY SEN SCHOOL
LAND AT KESTREL WAY, LUTON
PLANNING DESIGN & ACCESS
STATEMENT



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LBC / LAND AT KESTREL WAY SEN SECONDARY SCHOOL
KESTREL WAY, LUTON
PLANNING, DESIGN & ACCESS STATEMENT – SECONDARY SEN SCHOOL



Isometric View of the Frontage



Isometric View of the Frontage

1.0 INTRODUCTION BRIEF

INTRODUCTION

Luton Council Education & Learning Department has been working with the Schools Estate & Strategy Manager, who has instructed the Project Design & Delivery Team to make the planning application for a new SEN Secondary School facility, on the land at Kestrel Way, which is currently owned by Luton Council.

As a Local Authority we want to ensure Luton schools have the capacity in terms of staff training and understanding of support needs to offer outstanding, quality first education that meets the full range of needs, complemented by additional, specialist, local provision for those children with the most challenging and diverse needs. Luton's children and young people are the future of the town. They are entitled to the best possible life opportunities that we can give them at every stage from their birth and early childhood through education to the transition into adulthood and employment.

Since 2010 there has been a rapid increase in Education Health Care Plans (EHC) both nationally and in Luton. A recent government SEN review identified 15.8% of all school children were identified with Special Educational Needs (SEN). 82% were in mainstream schools with just 18% in specialist settings. Luton's mainstream schools are coming under more pressure to provide for the needs of students with SEN. Specialist settings naturally afford more time to look at the individual rather than mainstream schools which are under more pressure to perform academically.

Projections based on the past 5 years data suggest that the No of EHC plans in Luton will increase by 60% between 2019-2025. Therefore it's essential that Luton Council is pro-active in providing the specialist facilities for the increasing number of students on EHC's.

1.1 THE PROPOSAL

- 1.1.1 The proposals for the new school will provide outstanding educational facilities, creating an environment where pupil's can thrive and their wellbeing is prioritised.
- 1.1.2 The design of the school is to educate up to 112 pupil's across 14 teaching classrooms, to meet the borough's increased demands for SEN provisions. Specialist provisions include a hydrotherapy pool, support rooms and external play areas. The design also incorporates the option for a further phase including provision for a 4 bed respite centre, when funding allows.
- 1.1.3 There will be a dedicated site entrance and exit with Kestrel Way, where a semi-circular internal parking design also provide an internal drop of area for the dedicated school buses. To the rear of the school, there are dedicated external play areas which provide open play space, specialist play equipment and areas for outdoor learning and activities.
- 1.1.4 At the front of the site the access from Kestrel Way Road will be one way, so that there is a dedicated entrance and exit from the semi-circular shaped car park. This allows the school buses to congregate near the main school entrance within a safe compound, while parking spaces are centralised, with dedicated disabled car parking spaces to one side and the opposite side used for waste and recycling services along with electric charging car parking spaces.

- 1.1.5 The proposed building will extend to a maximum of two stories where the two wings are kept at a single storey level, with a double storey height multi-purpose hall in the centre.
- 1.1.6 The parking area also naturally falls towards the centre of the semi-circle where a dip in the ground is provided to collect and drain the surface water. The main entrance is then located at the centre of the semi-circle radius, to provide access to the main reception of the school. To the rear of the building the building shape allows various zones of play areas, which include specialised play equipment, open space and shaded areas for the children to exercise or carry out various activities.
- 1.1.7 The building will be built using high quality materials such as brickwork, insulated fabric and aluminium windows so that the building will stand the test of time and fit in with the surrounding. In addition to this the timber will be utilised where it can, such as the structure to the canopies. The surface materials to the front of the car parking will incorporate permeable block paving to soften the parking area, but also to allow surface water to be collected and diverted. The internal lighting system will also be a system, where this can be efficiently controlled and monitored.

1.2 SITE DESCRIPTION, CONTEXT AND OWNERSHIP

- 1.2.1 Kestrel Way is located to the north of the Birds estate, Luton. The site is close to both the woodside link road and boundary to Central Bedfordshire. The Birds estate sits within the Lewsey Ward which is located in the North West of the Town.
- 1.2.2 Figure 1 on the adjacent page shows the site for the proposed new SEN Secondary School, which is owned by Luton Borough Council. The boundary is shown by the red line and the site measures 3.06 acres.

- 1.2.3 The site was previously occupied by a 60 meter radio telecommunications mast with supporting cabling in a tripod configuration. In addition to this there is a single storey brick built service store situated in the North West corner of the site. The site is a brownfield site with a gentle slope from Kestrel Way to the rear boundary.



Figure 1 – Aerial view of the Site

- 1.2.4 The site is situated to the south of Kestrel Way with Coldsfoot Green to the west, Ravenhill Way to the east and Fieldfare Green to the south. The east, west and south boundaries are surrounded by low-medium density residential housing which are served off of a number of small feeder roads. To the north of Kestrel Way sitting within the Central Bedfordshire boundary is country side with the river Lea running through.
- 1.2.5 There is a ditch running along the border between the site and Kestrel Way. The ditch serves as a deterrent for trespassers and

vehicles entering the site and does act as a drainage channel, so will therefore be removed.

1.2.6 There are two bus stops on Kestrel Way located at the North West corner of the site.

1.3 PLANNING OVERVIEW

1.3.1 The site is not located within a conservation area

1.3.2 The site is not located in an area of natural beauty (AONB)

1.3.3 There are no known tree preservation orders (TPO)

1.3.4 There are no listed buildings on site

1.3.5 The site is not on a Metropolitan green belt.

1.3.6 The site unallocated, but forms a previously developed land due to the existing use for a large radio mast.

1.4 CONSULTANTS

The design proposals were developed in consultation with relevant consultants and the following interested parties:

- The Design Team (LBC Project Design & Delivery Team, (inc Architecture & M&E)
- Civil, Highways & Drainage Consultant (JPP Consulting Ltd)
- Geotechnical & Geoenvironmental Surveyors (Soiltechnics Ltd)
- Ecologist (Bernwood Ecology)


- Topographical & Below Ground Services Surveyor (Malcolm Hughes Land Surveyors)
- Transport Planning Consultant (SCP, an RSK Company)
- Energy, Environmental & BREEAM Consultant (Nature Positive Ltd, an RSK Company)

1.5 External land use



Location Plan

Legend

	Proposed Site Boundary		Residential Area (mainly 2 storey)
	Central Bedfordshire Boundary		Queen Elizabeth II Field (LLP 27)
	M1 Motorway		Charlton within Toddington Ward
			Proposed Site

1.6 Existing and proposed site plans



Existing Site Plan



Proposed Site Plan

2.0 SITE ANALYSIS

An analysis of the site has highlighted a number of constraints and considerations which include:

- Site topography
- Ground Investigation & Contamination
- Flood Risk
- Existing landscaping/ habitat & site ecology
- Highways access and transportation
- Site drainage
- Existing utilities
- Land and building use
- Surrounding area

2.1 SITE TOPOGRAPHY & GROUND INVESTIGATION

2.1.1 A detailed site survey of the topography and below ground services has been carried out and has been illustrated on the existing site plan, and is also available to review as its original drawing as part of this planning application.

2.1.2 The site was used for a telecommunications mast so is enclosed to three sides by a timber fence to the adjacent residential properties rear gardens, with the general ground surface composing of unkept overgrown grassland and vegetation, and an open frontage to Kestrel Way Road. The topographical survey has identified a level change across the site, of approx. 2.7m from the South falling to the North on Kestrel Road, with a cross fall of 1.2m from the West falling towards the East site boundary to Goldcrest Close, taken along the centre line of the site.

2.1.3 The survey has also identified the main utility services within Kestrel Way Road, with the electric and telecoms coming into the site to serve the existing mast electric sub-station. The mast has now been removed and the other supporting elements will also be removed, with new below ground services brought into the site from Kestrel Way Road to suit the proposed scheme.

2.1.4 The Civil Engineering Consultant has reviewed the initial site skeletal levels and have proposed a suitable finish floor level of the ground floor as indicated on their proposed site plan, which accompanies this application and has been co-ordinated with their drainage strategy. This has been determined by allowing a gentle slope from Kestrel Way Road to the school main entrance and maintaining flush level access to the external doors of the school to allow wheelchair access.

2.1.5 A Desktop Preliminary Investigation Report along with a Final Ground Investigation Report has been provided following a site investigation, which has been made available to review as part of this planning application. The report has identified that the top soil was inert and the general ground below was classed as non-hazardous with no asbestos identified.

2.1.6 The Topsoil generally comprised a dark brown, slightly sandy/ gravelly clay, with glaciofluvial deposits encountered below this level and generally comprised a soft to firm, light brown, slightly sandy/ gravelly. The Grey Chalk Subgroup was encountered as a Grade Dm cohesive material which generally comprised structureless, light brown and grey, slightly gravelly clay. The gravels were weak, low density and cream or grey in colour. The deposits are relatively impermeable, so a soakaway design is not suitable and attenuation measures have been adopted.

2.2 EXISTING TREES

2.2.1 The site consists of mainly grassland areas, with dense scrub to the perimeter of the site boundary, which abuts the existing neighbour's garden fences. The site is relatively isolated from significant areas of greenspace or semi-natural habitats by residential development and roads. There is currently a small number of trees on the borders of the surrounding residential houses. Some of these trees sit just inside the residential rear gardens and overhang into the site boundary.

2.2.2 The design of the site and location of the building takes these into consideration and are generally unaffected, or cut back to the boundary.

2.2.3 There are no Tree Preservation Orders (TPO) on the trees sitting within the site boundary.

2.3 FLOOD RISKS

2.3.1 The site is shown on the GOV.UK Flood Map for planning to lie in the low probability flood zone (Flood Zone 1). However due to the nature of the proposed SEN school use the school would be classed as "a more vulnerable development",

2.3.2 It is considered to be at a low risk from river and sea sources. Also following a review of the other forms of flooding such as from sewers/ surface water or ground water, the proposed development of this site would be considered "appropriate".

2.3.3 A Flood Risk Assessment has also been produced by JPP Consultancy to review the various flood risks involved with the site as well as carrying out some rainfall simulation calculations for the site, of which a copy of the report/ calculations has been provided.

2.4 ECOLOGY

2.4.1 A desktop Ecological Appraisal and site survey has been carried out to review the existing habitat, type of species that are using the site as well as the biodiversity that present, which is included within a report written to highlight these observations. A copy of this has been made available for review as part of this planning application.

2.4.2 The survey evaluated the habitats within the site boundary as having limited ecological value, consisting predominantly of species-poor semi-improved grassland, hardstanding and scrub.

2.4.3 The site is relatively isolated from significant areas of greenspace or semi-natural habitats by residential development and roads, so the potential for presence of protected species is limited, however a further survey of the substation building was carried out as a precaution to confirm that there is an absence of roosting bats. This is detailed in full, within the Bat Survey Report, which has been made available for review as part of this planning application.

2.4.4 There are no statutory sites within 1km of the proposed development area, and the nearest non-statutory site is approximately 300m away, indicating that impacts upon designated sites during the construction phase of the site are highly unlikely due to the distances involved. In addition to this the nearest watercourse is 250m north of the proposed site.

2.4.5. Habitats within the site boundary are of limited ecological value, being relatively common and widespread in the local area and with a relatively low species diversity. The proposed scheme will result in the loss of a large proportion of the onsite habitats, which will be compensated for within the proposed landscape scheme through the creation of new habitats and features to ensure a Biodiversity Net Gain in line with local and national planning policy.

2.4.6. Following the desktop survey, no records of reptiles were returned from the data search. Habitats within the site boundary (tall grassland, scrub) do offer some potentially suitable habitat for sheltering and foraging reptiles; however, the lack of connectivity of the site to adjacent areas of suitable habitat limits the potential for reptiles to be present. The historical species records did not return any confirmation of great crested newts on the site, which is also backed up that the nearest known pond is 250m away.

2.4.7 There are numerous records for badger within 1km of the site, as well as records for water vole from nearby streams. In addition some evidence of fox were noted during the site survey, however no evidence of animal burrows were recorded during the site survey and therefore it is considered that both badgers and foxes setts are unlikely.

2.4.8 The presence of nesting birds within the site during the spring and summer months is considered likely; these could be ground-nesting birds within the grassland or common garden birds utilising the scrub and buildings, however no evidence of nesting birds was visible on the radio mast at the time of the survey, as the mast has now been removed.

2.4.9. As part of the BREEAM requirements the proposed scheme will be seeking some of the ecology credits, of which the ecological report set out measure to aid meeting these requirements.

2.4.10 It is recommended that the final design includes measures to minimise changes in artificial lighting so not to have a detrimental effect on local bat populations and must be carefully designed to minimise light spill onto surrounding habitats.

2.4.11 In order to ensure a Biodiversity Net Gain as part of the proposals, the following measures could be incorporated into the landscaping scheme for the project. To use and enhance the proposed swale located to the front of the site within a semi-circular landscaped area. A number of proposed measures such as maintaining water within the swale, along with incorporating oxygenators to maintain the quality of the water would help establish a native pond flora. In addition and using native species to the banks and surrounding area would increase the biodiversity value of this landscaped area.

2.4.12 As part of the wider site landscaping and bio-diversity grassland areas within the landscaping scheme could be sown and managed as a wildflower meadow. The boundary areas could also be planted with a native scrub mix including species with native heavy standard trees planted within playground/ landscaping areas.

2.4.13. To provide enhancements for local bat populations, integrated bat boxes could be incorporated into the proposed new SEN building, to provide new nesting locations.

2.4.12 The ecological mitigation hierarchy will be followed for all elements of the project, from design, to construction, to end use, to ensure there is a net gain to biodiversity on site and the favourable conservation status of protected species is maintained. Best practise measures will also to be taken to avoid the risk of harm to wildlife during the construction activities.

2.5 HIGHWAYS ACCESS

2.5.1 Site access will be provided via Kestrel Way. There is an existing drop curb and access road to the mast services building located in the North West corner of the site, which will only serve as a temporary access to set up the enabling works.

2.5.2 A new proposed vehicle access point will also be provided further along from Kestrel Way Road to provide dedicated one way system, with the entrance from the North East corner, with a further new exit to the North West corner, to allow traffic to enter and flow through the site.

2.5.3 While the vehicle site entrance/ exit routes will allow cyclists to reach the site and secure their bikes with a covered area located to the North East of the parking area. A set of pedestrian access gates have been provided at either sides of the site to allow direct access from Kestrel Ways public footpath, with a dedicated route to the schools main entrance.

2.5.4. Our appointed consultant has met on site and liaised with LBC Highways Department to determine that the existing bus stop is proposed to be relocated to suit the new entrance and exits from the site, to ensure that there is a safe highway access and that the bus stop on the opposite side still maintains a link.

2.5.5 The existing speed bumps can remain in their existing locations, so that Kestrel Way still benefit from the traffic calming measures that these provide.

2.5.5. The Civil Engineering Consultant has provided a site plan to indicate the extent of works to Kestrel Way, to be able to form the new site access. In addition to this the Transport Consultant has issued a separate to discuss the proposals to provide for a more detailed analysis.

2.6 TRANSPORT

2.6.1. A transport consultant has been appointed to carry out traffic surveys and review the local highway network, public transport and site access. A copy of the Transport Statement & Travel Plan reports have been made available for review as part of this planning application.

2.6.2 Kestrel Way is a residential road that fronts the northern site boundary that connects to Pastures Way and Wheatfield Road at a 4-arm roundabout. The road provides access to numerous residential streets and is subject to a 30mph speed limit, with regular spaced street lighting columns and footways on both sides of the carriageway along its entirety.

2.6.3. As part of the BREEAM requirements the proposed scheme will be seeking some of the transport credits, of which the Transport Statement addresses.

2.6.4 Following a traffic survey the 85th percentile speeds recorded showed a 7-day average of 26.1mph for northeast bound traffic and 25.5mph for vehicles travelling south-westbound.

2.6.5. The transport report undertook an analysis that shows that two accidents were recorded along Kestrel Way in the vicinity of the proposed site during the 5-year study period, which is not considered to be an unusual frequency. This also demonstrates that the area in the vicinity of the site does not have any recurring highway safety problems that could be affected by the development proposals.

2.6.6. To the northern side of the carriageway there is 3m wide shared footway/ cycleway which form part of the National Cycle Route Network, with a circa 6m grass verge separating it from the carriageway in the vicinity of the application site.

2.6.7. Directly outside the site there are existing bus stops on either side of Kestrel Way Road, of which will remain and provide services to Luton Town Centre & the local Lewsey Farm/ Park areas. In addition to this the site benefits from good levels of accessibility by foot, and is within acceptable walking distance from the adjacent communities.

2.6.8. The internal road layout consists of a shared surface arrangement, which is of sufficient width for a refuse vehicle to pass a car. There is a separate gated road within the site for the secure arrival of students in minibuses. Both the site access and internal roads have had a swept path analysis undertaken to demonstrate that a vehicles can access the site and exit in a forward gear.

2.6.9. The proposal is to provide a special educational need school facility, which operates a different way to suit the pupil's attending the school and to cater for the various disabilities. The majority of the school pupil's will be picked up and dropped off by a fleet of specialist school buses, using an internal dedicated drop off zone.

2.6.10. The Luton Borough Councils parking standards have been followed to provide staff, disabled, electric vehicle charging and a bus drop of area, with secure covered parking for cyclists adjacent to the main school building entrance as well as adjacent to the disabled parking area.

2.7 DRAINAGE

2.6.1 Following initial ground investigations and a review of the proposed planning scheme, the Civil/ Drainage Engineering Consultant has developed an initial drainage strategy, as indicated within their report and proposed site plans, and accompanies this application.

2.6.2 As this existing site is used for a mast there isn't any requirements for any foul drainage, therefore new infrastructure will be introduced to collect both foul and surface water, which will be installed within the site boundary with a new connections made into the existing main public drainage system within Kestrel Way.

2.6.3 As stated under 2.1.6 the Ground Investigation concluded that the site is not suitable for a soakaway design to be implemented due to the ground conditions and lack of impermeability, therefore an alternative option has been proposed.

2.6.4 The various SUDS requirements have been reviewed and considered within the drainage strategy report, with an assessment made to identify the most suitable options. This will be designed to suit the 1 in 100 year plus 40% climate change event, with rainfall simulation calculations for the site provided in support.

2.6.5. The proposed drainage strategy will comprise a piped network in addition to tanked permeable paving and filter drains, with attenuation provided in a detention basin/ swale within the semi-circular landscaped area at the front of the site. The surface water will outfall to the Thames Water network within Kestrel Way Road.

2.6.6. In addition to the proposed swale, a cellular below ground attenuated gravity fed drainage system has been designed, as outlined within the Civil Engineering Consultant's Flood Risk Assessment & Drainage Statement.

2.6.7. The foul water system will be constructed to suit the proposed scheme and discharge into the existing Thames Water foul sewer within Kestrel Way Road.

2.8 UTILITIES SEARCH

2.7.1 A number utilities desktop searches have been carried out. The following companies have been contacted –

- Affinity & Anglian Water
- BT Openreach & Virgin Media
- Cadent Gas
- Colt Telecom & Vodafone
- Equans & GTC
- Instalcom & CityFibre
- MBNL
- National Grid Electricity & UK Power networks
- Sky & Verizon Business
- Sota
- Thames Water
- Utility Assets

2.7.2 The desktop searches show the majority of services running beneath the road or pathways of Kestrel Way, of which the topographical/ below ground services survey confirms.

2.9 LAND & BUILDING USE

2.8.1 The site is surrounded on three sides with a variety of residential property types. They are predominantly two storeys in height, some of which have rooms in roof to provide additional living accommodation. There is also a mix of 2 storey flats that are located throughout the overall residential area.

2.8.2 The site will be solely accessed from Kestrel Way which serves as a perimeter 'feeder' road for smaller roads leading into the Birds Estate. Kestrel way has countryside on one side and residential housing on the other.

2.8.3 The proposed building use is for educational purposes and has been located in the centre of the site to make best use of the existing land and provide open space to the front and rear of the building. The core of the building is 2 storey to accommodate the main classrooms and support rooms, with single storey wings.

2.8.4 The building plan design have been splayed to minimise any impact of the building footprint, as it is the building external corners that are the closest points to the site boundary, to incorporate the hydrotherapy pool and respite accommodation.

2.8.5. The proposed site layout enables its users to access the site directly from Kestrel Way Road, allowing the site to be self-contained by incorporating refuse and cycle storage facilities as well as proposed M&E services to be housed and allows the building to run efficiently.

2.10 SURROUNDING AREA

2.8.1 The site lies to the northwest of the Luton town centre. The site sits on the outskirts of the Birds housing estate and forms part of the Lewsey Ward. Much of the housing stock in the area dates from the 1980s and 1990s and is a mixture of detached, semi-detached, terraced and cluster homes.

2.8.2. It is an area characterised by properties arranged in cul-de-sacs and clusters of terraced houses segregated from the main vehicular and pedestrian circulation routes. Residential car parking is provided in parking courts to the rear of properties as well as having a mix of private driveways at the front and rear of properties.

2.8.3. The neighbourhood also accommodates a number of businesses that support the local area from food stores, hairdressers, pharmacy's as well as local businesses.

2.8.4 South of the site is Lewsey Park, which provides a number of amenities including sports pitches, native woodland habitat, wildlife areas, river and wetland areas.

2.8.5. To the north is the woodside link which connects Dunstable and Houghton Regis to the new 11A junction of the M1. The link road travels through countryside and across the river Lea. Leagrave railway station is to the east, just over 2 miles away from the site by vehicle and 30mins walking.

2.8.6, The following pages provide photographs of the site and surrounding area.



Location Plan



View from Kestrel Way

2.11 SITE PHOTOS



Site Location Aerial Image

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KESTREL WAY, LUTON
PLANNING, DESIGN & ACCESS STATEMENT – SECONDARY SEN SCHOOL



Kestrel Way – Existing Site Access



Existing mast (now removed) looking South East. Photo taken in north west corner of site

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Taken from south west of site looking north at Kestrel Way



Looking north at the single storey brick service building to be demolished



Taken from Kestrel Way public footpath towards the South West Corner



On site looking south towards residential housing and Lewsey Park

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Picture taken from other side of Kestrel Way looking south to site



Coltsfoot Green to Kestrel Way T-junction



Kestrel Way looking East towards M1 and Luton Town Centre



Kestrel Way Site Frontage



Kestrel Way Site Frontage



Kestrel Way looking south east to pastures way. New residential on right side



Looking south west up at Kestrel Way towards the proposed site



Looking along Ravenhill Way from Kestrel Way



Looking across Riverside Way cyclepath to Ravenhill Way Picture taken from woodside link



View from Kestrel Way looking out to Woodside link, river Lea and M1



Riverside way cycle path running parallel with Kestrel Way



3.0 PLANNING PRE APP & POLICY

3.1 PRE APPLICATION

3.1.1 A pre-planning application was submitted on 16th August 2022.

3.1.2 The proposal was reviewed against the development plan and no adverse comments were made and confirmed that the site is not allocated for any other uses and would be classed as previously developed land due to the original telecommunications mast and land use.

3.1.3 The proposed educational use of the land would create an intensification of the use of the site, however due to the school would be part of the urban fabric that this would be considered acceptable.

3.1.4 The initial outline design was considered acceptable of the principle of the size, scale and bulk of the proposed building.

3.1.5 The proposals will provide an alternative use for the site and by the nature of the proposals, would create a certain impact on the surrounding area, as well as providing a benefit of additional specialist school places. However a school is classed as part of the urban fabric of a settlement and the intensification of use will be considered acceptable for this location.

3.1.6 The comments also highlight that there is an extent of additional information and highway considerations, but the relevant consultants have been appointed and reports submitted as part of this planning application.

3.1.7 The site lies within Flood Zone 1, but due to the size of the proposed site the application will need to be accompanied by a Flood Risk Assessment, which has been provided as part of the planning application.

3.2 PUBLIC CONSULTATION

3.2.1 Engagement is a key part of the planning process and Government guidance clearly encourages consultation to be undertaken as part of development projects.

3.2.2 The Council's Statement of Community Involvement (SCI, 2012) encourages applicants to inform neighbours and all affected parties of development proposals and states that "*early public consultation on proposals is beneficial to both the public and the developer.*" (Paragraph 68).

3.2.3 The National Planning Policy Framework (NPPF, September 2023) recognises the importance of early engagement as having "*...significant potential to improve the efficiency and effectiveness of the planning application system for all parties.*" (Paragraph 39). It further notes that "*LPAs have a key role in encouraging other parties to take maximum advantage of the pre-application stage[...]. They should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community and, where relevant, with statutory and non-statutory consultees before submitting applications.*" (Paragraph 40).

3.2.4 Overview of public consultation & engagement programme

In line with the Council's SCI and the NPPF, Luton Borough Council have delivered a comprehensive public consultation and engagement programme prior to finalising the designs and submitting this application. The programme was designed to engage with residents, businesses and all local stakeholders in order to make the community aware of the proposals and provide the opportunity to comment upon them. Public engagement took place from the 1st November – 15th November 2023.

3.2.5 Consultation and engagement notification

The consultation and engagement website was publicised via 20 posters (see Appendix B) being publicly displayed in the local area two weeks before the public exhibition.

A consultation leaflet (see Appendix B) was delivered via Royal Mail to 152 addresses in the immediate surrounding site area. The leaflet provided an overview of the scheme and details of the consultation website and public exhibition. The Royal Mail delivery date was 18th October 2023.

Ward Councillors and the Headteacher of Woodlands Secondary School were notified about the public consultation programme and received a consultation letter on the 16 October 2023.

3.2.6 Consultation and engagement website

The consultation was based around the consultation website Welcome Kestrel Way, Lewsey (lutonsenschool-kestrelway.com) which provided details of the scheme as well as an online survey. The survey was accessible from the 1st November – 15th November 2023.

3.2.7 Two day public exhibition

A public exhibition was held on Wednesday 1 November 2023 from 3pm to 7.30pm and Saturday 4 November 2023 from 9am to 1pm at Lewsey Community Centre, Landrace Road, Luton, LU4 0SW. Members from the project team, including the Council's education department attended both exhibitions. The public exhibition featured 6 display boards providing information about the site and proposals (see Appendix B).

Ward Councillors and the Headteacher of Woodlands Secondary School were invited via email to a preview event at Lewsey Community Centre on Wednesday 1 November 2023 from 2-3pm. The community had the opportunity to review the scheme, ask questions and complete feedback forms. The feedback form contained the same questions as the online survey (see Appendix B).

3.2.8 Public consultation and engagement findings

The findings of the public consultation and engagement are presented in Appendix B.

In summary:

- The consultation and engagement website received 96 unique visitors and the site was viewed 127 times.
- 10 online surveys were completed and 5 partial responses were received.
- The public exhibition was attended by two Ward Councillors and 11 members of the public.
- 4 completed feedback forms were received from the public exhibition.

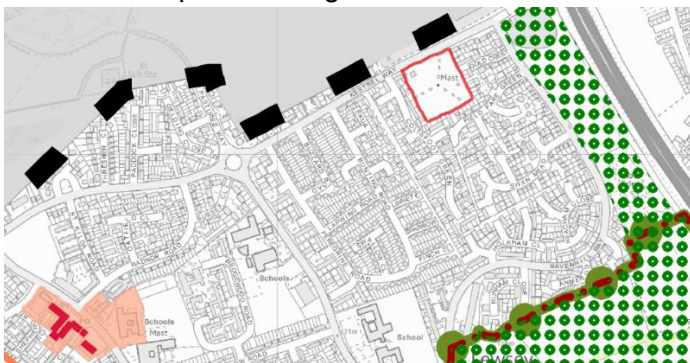
Overall, the majority of feedback received was positive towards the scheme with 60% of responses received supporting the plans for the new SEN secondary school. Where comments or queries were made on specific issues relating to the scheme, these have all been fully assessed and considered in the technical reports, including this Design and Access Statement, which accompany the application.

Parking and traffic concerns were the most common issues raised and have since been considered by the Shared Learning trust and design team. Chapter 4.3 and 6.1 of the Design and Access Statement specifically address transport and parking matters.

This consultation marks the first in a series of stages. The next consultation stage will comprise a statutory consultation exercise undertaken by the Council upon validation of the planning application. Luton Borough Council remains committed to listening to, and working with, the local community throughout the planning and construction process.

3.3 POLICY

The proposed site is allocated within the North East of the Lewsey Ward on the Policies Map of the Luton Local Plan (2011-2031), however no specific designation has not been identified on the map.



The freehold of the school land is held by the Local Authority, with the area identified for development has been outlined in red.

The following policies were considered as part of this application:-

- LLP1 Presumption in favour of Sustainable Development
- LLP2 Spatial Development Strategy
- LLP24 Education and Other Community Facilities
- LLP25 High Quality Design
- LLP28 Biodiversity & Nature Conservation
- LLP31 Sustainable Transport Strategy
- LLP32 Parking Provision
- LLP36 Flood Risk
- LLP37 Sustainability
- LLP38 Pollution and Contamination

3.4 LUTON LOCAL PLAN (2011-2031)

The design, siting, scale and parking provision reflect and integrate well within the surrounding area and acknowledge the requirements of the local plan. We believe the scheme addresses the requirements of the following Local Plan Policies:

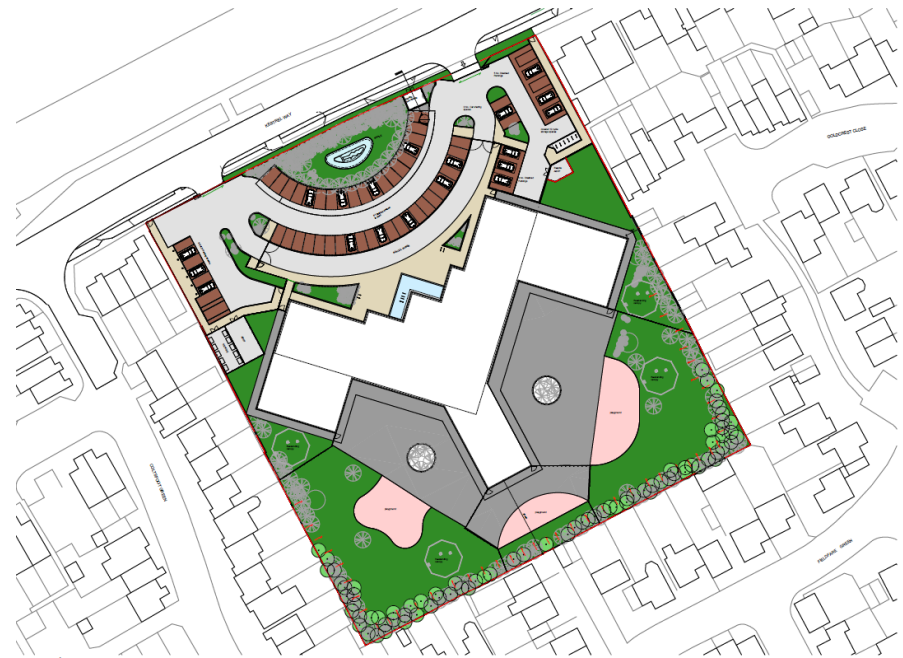
LLP1 Presumption in Favour of Sustainable Development

This Policy requires a development to contribute to enhancing a sense of place, preserve or improve the character of the area. Development proposals should respond to, and enhance, local character, the natural environment, heritage assets, and the identity of the Borough. This in turn will also encourage growth in homes, jobs & services using sustainable development and to manage change so as to create a network of connected, sustainable, high quality, locally distinctive and healthy places. Provided the growth is directed to places with good concentrations of existing infrastructure or areas where there is capacity to grow with further sustainable infrastructure investment within the plan period to 2031, would then be welcomed.

We believe this sustainable development will enhance the local character of the area by using good quality materials that provide an enhancement to the character of the neighbourhood as well as having a distinctive design. In addition the proposal of a new SEN school will provide a dedicated school building that can address the high demand for additional SEN school pupil's places. In conjunction with the BREEAM requirements, the site would be designed to incorporate a sustainable drainage system as well as providing green open space for the students and staff, with suitable landscaped areas to address the bio-diversity of the site, like the semi-circular parking/drop of area which will incorporate planting and a drainage basin/ swale.

The building fabric and how the schools heating and ventilation system is run by the use of an Air Source Heat Pump, so will provide a more sustainable approach. Both a drainage and energy consultant has reviewed the scheme and provided a supporting report to identify the options available.

The proposed development meets with the requirements of LLP1 by responding to a defined additional need for a SEN Educational School in the borough and providing an efficient layout incorporating energy and water conserving measures.



Site Block Plan

LLP2 Spatial Development Strategy

This Policy identifies that there is a need for 17,800 net additional dwellings to be built in the borough to support the population growth of Luton over the period 2011 – 2031. In order to help meet this requirement, development proposals which comply with plan policies, subject to the availability of appropriate infrastructure, will be considered.

This Policy also sets out the Spatial Development Strategy for the Borough, setting out objectives for housing delivery, job creation, retail provision and improvements to infrastructure associated with development.

The proposed site for this development has already been put into use by its use as a telecommunications mast which has now become redundant and has been removed. Which allows this site to be changed to suit the current land use requirements and provide a site for a new special educational needs educational school for the community.

Currently Luton has two specialist secondary SEN schools to provide these type of facilities that are located within the North and South of the Borough, which are required to serve the whole the Luton.

This development meets LLP2 by delivering new educational facilities, with net additional employment benefits on a non designated site with a suitable catchment area to serve Luton.

LLP24 Education and Other Community Facilities

Education and Other Community Facilities, states that planning will be granted for development which contributes towards an identified need for community facilities and services.

New and extended education, childcare, nursery, and other community facilities will be granted planning permission provided that:

- *a demonstrable local or regional need is established, and the facility is well related to the area it serves;*
- *it would not adversely affect the viability and vitality of a District or Neighbourhood centre;*
- *there would be no unacceptable effect on the amenity of any surrounding residential dwellings and other uses;*
- *it does not take land either in or allocated for other uses, unless it is demonstrated that the need for the facility outweighs that for the existing or allocated use;*
- *there is suitable vehicular access and safe dropping off and picking up areas; and*
- *where the proposed facility would be in premises that are used for another purpose, it remains subordinate to the main use of the premises.*

The proposed educational facilities are being proposed on an existing site that has been used for a telecommunications mast, but is redundant. The site is located on land at Kestrel Way, within the Lewsey Farm ward of Luton. Currently Luton has two specialist secondary SEN schools to provide these type of facilities. These are Woodlands located in the Marsh Farm Estate and Windmill Hill located in the Town Centre.

The proposed school facilities will allow a vision for children and young people with special educational needs (SEN) is the same as for all children and young people in Luton. This will enable the pupil's to lead happy, purposeful lives as part of their community in Luton, have choices and know that their voices are heard about decisions that affect them, which in turn will allow them to flourish and thrive so that they can continue to achieve their full potential and aspirations in their early years, at school, college and as adults.

There is a significant demand for a special school provision due to the increasing pupil projections that are indicating a shortfall in secondary school places in 2024 and provide a diverse provision across the town to meet a wide range of increasingly complex needs. The proposed school will have 112 places and cater for children between Year 7 – 13, which then also includes for the children at the school to remain for sixth form/ higher education teaching, but to suit their specialist needs. Budget pressures have meant that only smaller school extension can be provided to try and meet the rising demands, but this is an opportunity to provide high quality SEN school places for a large number of pupil's. The school will provide space for 112 children, with 14 No classrooms and additional specialist rooms. Students will have a range of special needs that include Profound and Multiple Learning Difficulties (PMLD), Severe Learning Difficulties (SLD) and pupil's with Autism Spectrum Disorder (ASD). Additional pupil's needs may also include physical, sensory and communication impairment or complex medical needs.

The proposal meets LLP24 by providing SEN school educational provision that Luton Borough is in the need for. A site analysis has shown there will be no adverse effect on surrounding dwellings and

amenities, with the original use of the site as a telecommunications mast for which the SEN School need far outweighs.

LLP25 High Quality Design.

Policy LLP25 is set out to ensure that proposed developments create a High Quality Design by incorporating the following requirements:-

- *Enhance the distinctiveness and character of the area by responding positively to the townscape street scene, site and building context, form, scale, height, pattern and materials, distinctiveness and natural features including bio diversity.*
- *Create or enhance attractive, safe, accessible and active open public spaces, creatively using hard and soft landscaping and public art for all members of the community.*
- *Provide continuity of built form, connectivity, active frontages and enclosure;*
- *Optimise and improve accessibility to walking and cycling and connections to public transport, local services, open spaces and community services and facilities.*
- *Optimise higher densities and avoiding back land development where it would give rise to averse amenity whilst meeting the other requirements of this policy.*
- *Provide green infrastructure and measures to protect, conserve or enhance natural assets and biodiversity.*
- *Be adaptable to change of uses and flexible to accommodate changing living and working requirements of all the members of the community.*
- *Reduce carbon emissions, risk of flooding, and increased energy and water efficiency and quality.*
- *Promote sport and physical activity and healthy communities.*
- *Promote opportunities for reducing crime and anti-social behaviour.*

The proposal is a mix of 1 to 2 storeys following the local vernacular. With the central area 2 storey and the outer wings being single storey, to lessen the impact on the bordering residential houses.

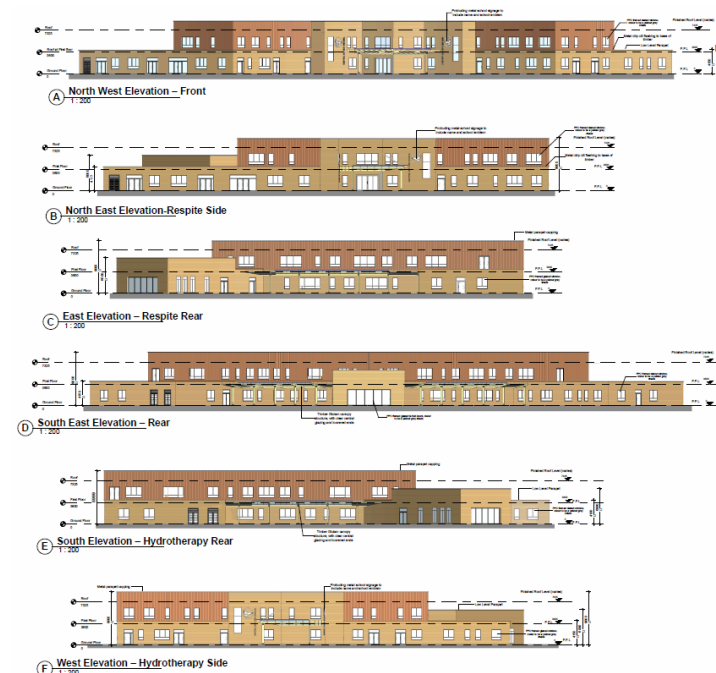
The front elevation from Kestrel Way is uniform with protrusions at a 45 deg angle which softens the impact from the road. The 45 degree angles also reduce the amount of overlooking into the neighbouring residential areas along with the mass of the building. While the colour palette reflects the same materials used on the surrounding residential housing to Kestrel Way, but also provides a suitable contrast to the building surround the site to the rear and sides.

High quality design and carefully selected materials create a development that would sit well within its setting, creating a strong context with considered form, scale and layout. The external facades are a mix of buff brickwork and timber style cladding which helps to blend in and lessen the impact of the proposal, as well as a distinctive design. The canopies at the ground level introduce some detailing to break up the façade as well as providing a practical use.

The proposal is to set back the building from the road further, to help it blend in with the surrounding residential housing. The front parking/drop of areas are partially obscured with a landscaped semi-circle area to the front and various other small planting areas in-between the road and school frontage. The areas to the rear will be levelled and re-grassed as well as landscaped with trees to the perimeter, with a tarmac playground with pockets of play equipment zones which are surround using safety surfaces. The rear retains a good amount of open space and zones the spaces for their particular uses.



Isometric view of the Site



Building Elevations

The school building has a number of large window openings providing a good amount of natural light into the building, using a mix of window styles to create effective design statement. The building fabric will meet with the current building regulations on energy efficiency and air tightness to maintain the internal controlled environment for the users.

The above paragraphs summarise how the various elements of High Quality Design in the form of both building materials but also site layout and appearance, so we believe the proposal achieves the requirements of LLP25.

Policy LLP28 - Biodiversity and Nature Conservation

Policy LLP28 is set out to ensure that proposed developments support the Biodiversity and Nature Conservation for the site and adjacent area by protecting the sites that are identified as being within the different tier designations.

The proposed scheme has been situated on an existing site that has already been developed and will look to replace the supporting elements of the original telecommunications mast with a new SEN educational facility to serve the local community of Luton.

A separate Ecology/ Bat survey has been carried out to identify the current status of the land and extent of existing habitats or eco systems on or in the existing site boundary or adjacent sites. Of which has been highlighted under Section 2.2 & 2.3 of this D&A Statement

Therefore the proposed scheme would comply with this policy by allowing the existing surrounding wildlife to be maintained and remain untouched, while creating new habitats and biodiversity on the proposed site, through the design of the overall landscape/ drainage schemes.

LLP 31 Sustainable Transport Strategy

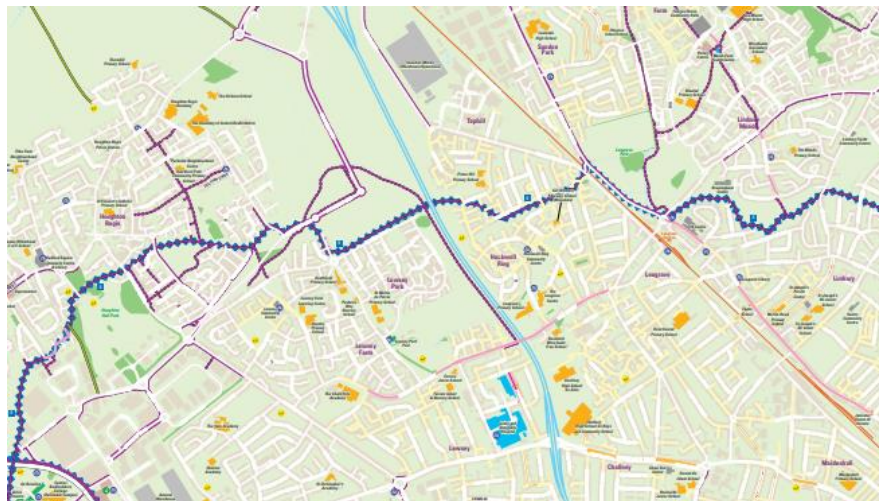
This Policy identifies the strategy for sustainable transport in Luton and is based on the vision for the Local Transport Plan 2011-2026, which is to ensure that an integrated, safe, accessible, and more sustainable transport system supports the economic regeneration and prosperity of the town.

Planning Permission will be granted for proposed developments that meet the criteria below where these are relevant to the proposal:

- *Minimises the need to travel;*
- *Provides a sustainable transport choice with priority for buses, pedestrians and cyclists;*
- *Reduces road congestion particularly at peak times;*
- *Reduces the safety risk to motor vehicles, non-motorised and vulnerable users;*
- *Provides cycle parking / storage and;*
- *Ensures the quality of the local environment is not compromised.*

There are currently two specialist secondary SEN schools in Luton Borough Council, which are located in the North and South central locations of the Borough. The new proposal is located in the West of the Borough. This will provide a closer school to students requiring SEN in the areas of Lewsey, Hockwell Ring, Farley Hill and Legrave. This will result in shorter more sustainable travel times.

The proposal currently has a bus stop outside which serves Luton and surrounding areas. In addition to this the proposal is located along a cycle route linking Luton, Dunstable and Houghton Regis as shown in the east to west cycle link map. In addition to this and due to the nature of the SEN facilities there are also school buses which operate to pick up and drop of majority of the pupil's, which avoids individual car trips by the parents.



East to West cycle link

The proposed development has been reviewed by a Transport Consultant who has carried out traffic surveys and reviewed, with items highlighted within the above Sections 2.5 & 2.6 of the D&A Statement. It has been demonstrated that the development benefits from good levels of accessibility by sustainable modes and has some local amenities within close proximity.

The vehicular access routes are accessed via the site entrance in a one way direction, as well as having two pedestrian gates at either side of the site, which provides a good standard with multiple transport facilities within close proximity providing access to a range of local destinations.

There is secure covered cycle storage on site within the secure site entrance gates to encourage staff, students and parents to travel in using an environmentally friendly method of transport. The proposed vehicular access, also allows for delivery and refuse vehicles, so that they can safely enter and exit the site to provide their services.

Following the information described above and taking into consideration the outcome of the Transport Consultant findings, we believe that proposals would comply with this policy and creating a suitable strategy.

LLP 32 Parking

This Policy focusses on the parking provision in Luton to ensure that this is managed to so that a proportionate number of spaces are available to support the growth of the town centre.

The proposals for reducing on-street parking in and around the town centre and for car free development may be supported in areas of high public transport accessibility including when linked to park and ride facilities, provided that:

- *There is no adverse impact on occupier amenity in other areas through displaced on street parking;*
- *They are supported with a travel plan that promotes car clubs where feasible; and*
- *The impact on short-term parking is minimised.*

Development will be permitted providing that:

- *Car parking provision should not exceed the maximum standards set out in Appendix 2 in order to promote modal shift, however within those standards, sufficient parking should be provided to help ensure that adverse effects on highway safety and the convenience of nearby residents and users are avoided;*
- *Minimum cycle parking standards is considered for new residential schemes.*
- *Cycle storage of an appropriate standard is provided for residential developments; and*
- *Parking standards shown in Appendix 2 are minimised in identified areas demonstrated to be of high accessibility.*

The parking strategy and numbers have been developed with a Transport Consultant to identify the items to be considered as well as the outcomes, in line with the Local Plan requirements. Their independent report noting that the proposed development is not anticipated to result in a material impact on the local highway network. The traffic impact of the scheme is therefore acceptable in planning terms.

SEN schools have a high level of staff to student ratio, hence the ratio of number of staff parking spaces. There are also allocated visitor and disabled spaces located close to the school frontage, along with secure covered cycle parking on site.

In additional the parking spaces will be fitted with suitable quantity of car electric charging points to encourage their use. We therefore believe that we have satisfied the requirements of this policy and provided an efficient site layout for the schools operation.

LLP36 Flood Risk

This policy states that the risk and impact of flooding will be minimised through:

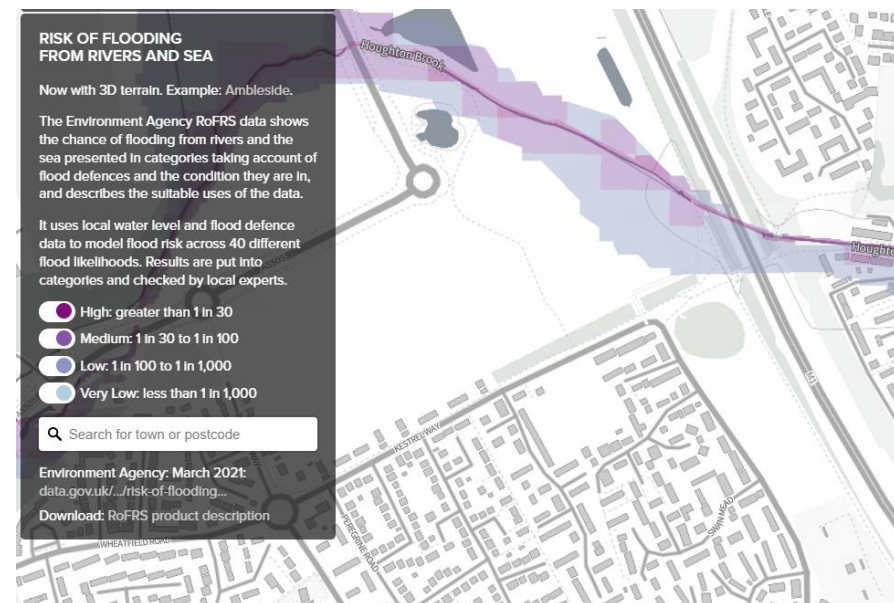
- *Directing new development to areas with the lowest probability of flooding*
- *Ensuring that all new development addresses flood resilience, the effective management of flood risk including opportunities for appropriate dry access for emergency vehicles.*
- *Ensuring that development does not increase the risk of flooding elsewhere including cumulative impact on adjoining and surrounding land and in the wide catchment; and*
- *Ensuring wider environmental benefits of development in relation to flood risk and contribute towards delivering “Good ecological status”.*

The site falls within Flood Zone 1 which does not require a dedicated Flood Risk Assessment which is also supported by referencing the Environmental Agencies Map. However due to the overall size of the site the Flood Risk has been assessed and included within the development application.

This Flood Risk Assessment has taken a detailed look at the proposed design and existing site dynamics. The development occupies a site which is in a low risk flood Zone 1 and introduces a suitable proposed drainage scheme, which also seeks to further minimise the effects of any surface water runoff by incorporating the appropriate land drainage requirements as set out within the Drainage Statement and associated drawings.

The report concludes that the proposals for SEN School at Kestrel Way, are fully compliant with policy in respect of development and flood risk, such that flood risk considerations do not constitute a barrier to the granting of planning consent.

Therefore the proposed design achieves the requirements of LP36 Flood Risk.



LLP37 Sustainability

This policy requires the development to consider that contribute towards mitigation, and adaptation to climate change through energy use reduction, efficiency, and renewable, and decentralised energy.

- *All new non-residential developments over 1,000 square metres will be required to achieve the 2013 Building Research Establishment Environmental Assessment Method (BREEAM) 'Good' status".*
- *Energy Hierarchy:*
 - a. consider reducing energy and water demand;*
 - b. consider energy generation from low and zeros carbon sources on site;*
 - c. consider decentralised energy networks and generation; and*
 - d. consider off-site solutions, retro fitting, and carbon reduction schemes.*
- *Waste:*

The Council encourages an overall reduction in the amount of waste generated, treated and disposed of to reduce the need for land for waste management. Proposals that are likely to generate significant volumes of waste through development or operational phases will be required to include a waste audit as part of the application.

To fully assess the buildings potential and how the design can be developed to provide an energy efficient and sustainable scheme an Energy Consultant has been involved and provided their own assessment included as part of the Energy Statement.

The proposal is set to meet the Building Regulation Part L requirements as a minimum standard as well as achieving BREEAM “Good” status. The proposed fabric design will take on the view to exceed the national standards set out in Building Regulations on carbon and energy performance.

To ensure that these targets are met and alternative sustainability technology such as PV has been considered, so that it can be identified on how this can be incorporated within the final design. We have also appointed a consultant to review BREEAM, environmental elements such as noise and air quality, so that a considered and relevant design can be identified to be developed at the next design stage.

Based on this information and concluding report summary, overall the scheme contributes to sustainable development and represents a reduction in CO2 compared to Building Regulations. Therefore we would consider that the development would support and comply with Policy LLP 37.

LLP38 Pollution and Contamination

This Policy considers the impact of the proposed site for pollution or contaminated land, so that measure can be taken to reduce or provide sufficient remediation measures as described below:

Pollution

Evidence on the impacts of development will need to demonstrate whether the scheme (individually or cumulatively with other proposals) will result in any significantly adverse effects with regard to air, land or water on neighbouring development, adjoining land or the wider environment. Where adverse impacts are identified, appropriate mitigation will be required. This policy covers chemical, biological and radiological contamination and the effects of noise, vibration, light, heat, fluid leakage, dust, fumes, smoke, gaseous emissions, odour, explosion, litter and pests.

Development should provide for the satisfactory disposal of surface water to deliver water quality improvements to receiving water courses and aquifers where feasible, and together with waste water disposal, should not be detrimental to the management and protection of water resources. In all cases, development must be carefully built, operated and closed in such a manner so as to ensure there are no long-term pollution problems.

During construction and operation, appropriate measures will be required to prevent the deposit of mud or other debris on or within public highways and water bodies from vehicles using the site.

As part of the energy statement noted above, a number of sustainable energy solutions can be adopted to avoid the M&E operation of the proposed building from having an increased effect on local pollution, which is also reviewed as part of the Air Quality report.

In addition the submitted Ground Investigation Report notes that there is no evidence to indicate the site is significantly contaminated and thus unlikely to be worthy of consideration of being determined as contaminated land under part IIA of the Environmental Protection Act 1990.

The proposed development would provide a surface water drainage strategy that will comprise of a piped network in addition to permeable paving and filter drains. Where infiltration is not viable, tanked permeable paving will be used. Attenuation provided in a detention basin and offline cellular storage, with the outfall to the existing Thames Water system. While the foul water will be collected and discharged into the Thames water foul sewer network within Kestrel Way Road.

During construction and operation, appropriate measures will be required to prevent the deposit of mud or other debris on or within public highways and water bodies from vehicles using the site. A competent contractor will also be employed through a tender procedure and they will produce a Site Construction Phase Plan to identify their operations so that this can be submitted and approved by the planning department.

Contaminated land

For proposals on or affecting contaminated land a site assessment must be carried out to establish the full nature and extent of the contamination.

It is defined as land where substances could cause:

- *Significant harm to people or protected species; and/ or*
- *Significant pollution of surface waters or groundwater (including Source Protection Zones).*

If contamination is found, remediation measures are to be agreed by the Council with reference to the Contaminated Land Statutory Guidance (April 2012), that such measures are carried out on site where this is viable and that such measures are completed prior to development.

Planning permission will be granted for the development or reuse of land that is unlikely to be affected by contamination but not for schemes that could:

- *Expose the occupiers of the development, or users of domestic gardens, or neighbouring land to an unacceptable risk;*
- *Threaten the structural integrity of any existing or proposed building on, or adjoining, the site;*
- *Lead to the contamination of any watercourse, water body, or aquifer; or*
- *Cause the contamination of adjoining land or allow the contamination of the development site to continue.*

The submitted Ground Investigation Report notes that based on investigations completed to date with respect to gaseous contamination, we are of the opinion the proposed development will be safe and suitable for use for the purpose for which it is intended (without the need for any remedial action) thus meeting the requirements of the National Planning Policy Framework section 178, and compliant with the Building Regulations Part C, 'Site preparation and resistance to contaminants and moisture.

The Ground Investigation Report highlights that the general ground does not highlight a contamination risk and has not identified asbestos in the samples taken, The topsoil has also come back as an inert classification for disposal to landfill. None of the soil contamination tests revealed elevated concentrations of contaminants in the soil or risk of gases being present, therefore there is not any significant risk to controlled waters.

If contamination is found, remediation measures are to be agreed by the Council with reference to the Contaminated Land Statutory Guidance (April 2012), that such measures are carried out on site where this is viable and that such measures are completed prior to development.

Land stability

Development must be sensitive to local ground conditions and land stability. It must be appropriate for existing conditions and ensure that the future stability of land is protected.

The site was previously occupied by a 60m telecommunications mast and consists of grassland and vegetation. There is a single storey services store on site. Due to the nature of the proposed site and complying with current building regulations the risk of any contamination will be significantly reduced.

The Drainage Statement and associated drawings indicate on how the foul & surface water drainage have been considered along with a proposal on how this will be collected and disposed of to meet with the policy requirements. A competent contractor will also be employed through a tender procedure and they will produce a Site Construction Phase Plan to identify their operations so that this can be submitted and approved by the planning department.

Based on the previous above information and the Ground Investigation Report, no risk has been identified of unstable ground conditions that can not be overcome. Any difference in site levels will be dealt with as part of the levels strategy, and/or incorporating retaining walls, while the foundations/ sub structure will be design to suit the identified ground conditions.

As part of the drainage strategy, the Civil Engineer has designed an intent drainage scheme to deal with the impermeability of the existing ground conditions and collection of storm/ surface water so not to impose any significant risks following the construction of the proposed scheme. Therefore after following the policy requirements we would deem that these can be complied with.

3.5 NATIONAL PLANNING POLICY FRAMEWORK

The National Planning Policy Framework was revised on 20 July 2021 and sets out the government's planning policies for England and how these are expected to be applied.

This revised Framework replaces the previous National Planning Policy Framework published in March 2012, revised in July 2018 and updated in February 2019. The framework sets out these core ideas which are considered to be relevant:-

- **Sustainability** – These requirements should be reviewed to help raise the standard of design as a whole, such as saving energy, efficient drainage systems and a good quality design to enhance the sustainability of communities and residential environments. Pursuing sustainable development by considering An Economical Objective, A Social Objective & an Environmental Objective.
- **Plan Making** - The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings. The development plan must include strategic policies to address each local planning authority's priorities as part of their Local Plan.

- **Decision Making** - Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible, as early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties.
- **Strong & Competitive Economy** - Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.
- **Health & Safe Communities** - promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other. Are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion. To provide the social, recreational and cultural facilities and services the community needs.

It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. Enable and support healthy lifestyles, especially where this would address identified local health and well-being needs

- **Sustainable Transport** - Transport issues should be considered from the earliest stages of plan-making and development proposals, so that potential impacts can be addressed, opportunities from existing or proposed transport infrastructure are realised. Opportunities to promote walking, cycling and public transport use are identified and the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account, with considerations are integral to the design of schemes, and contribute to making high quality places.
- **Effective use of the Land** - By meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Promote and support the development of under-utilised land and make more effective use of sites that provide community services such as schools and hospitals, provided this maintains or improves the quality of service provision and access to open space.
- **Well Designed Spaces** – Developments should function well and add to the overall quality of the area, so that they are visually attractive as a result of good architecture, layout and appropriate and effective landscaping. They should be sympathetic to local character and history, including the surrounding built environment and landscape setting.

The proposals should establish or maintain a strong sense of place with materials to create attractive, welcoming and distinctive places to work and visit. The site should be optimised to accommodate and sustain an appropriate amount and mix of development and support local facilities and transport networks, by creating places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future.

- **Climate change & Flooding** - The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, and support renewable and low carbon energy and associated infrastructure.
- **Conserving & Enhancing the Natural Environment** - Planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils. Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services. The impact on and providing net gains for biodiversity, including by establishing coherent ecological networks should be reviewed.

As well as 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.

3.6 DOCUMENTS

Following a review of the validation requirements for full planning submissions, the following documents will be submitted in support of this application and should be read in conjunction with this Design & Access Statement:

- Application Forms and Drawings
- Planning Statement (which forms part of the D&A Statement)
- Topographical & Below Ground Services Survey
- Preliminary Ecological Appraisal & Bat Survey
- Ground Investigation Report
- Transport Statement
- Energy/ Sustainability Statement
- BREEAM Assessment Requirements
- Daylight & Sunlight Assessment
- Noise Assessment
- External Air Quality Assessment
- Internal Air Quality Assessment
- Drainage/ Flood Risk Statement and Drawings
- Civil/ Highway Consultants Drawings
- Existing & Proposed Architectural drawings.
- Soft & Hard Landscaping Layout
- Site Waste Management Plan (which forms part of the D&A Statement)

4.0 PROPOSAL - DESIGN STATEMENT

The main focus and objectives of the proposal is to provide a school for the growing number of students in Luton requiring Special Education Needs provision (SEN).

There are currently only two SEN secondary schools located in the Town centre and in the north of the Borough. The new school will provide the much needed additional provision in the east of the Borough.

4.1 MATERIAL

The materials proposed are a mixture of brickwork external walls, composite/ timber cladding, timber/ steel glulam or steel supporting frames for the canopies and aluminium windows frames with high efficiency double glazing. The roof is an insulated flat design, with brickwork parapet walls capped with a pressed aluminium extrusion profile to provide the design character of the façade. The colour palette matches in with the surrounding housing but also provides a reasonable contrast so to provide variety, to add to its character and complement the existing architectural vernacular.

Visual interest is achieved through the variety of materials used and window configuration/ design. Consideration and emphasis will be given to use of modern methods of construction to provide a high level of detailing, thermal performance, minimal maintenance and sustainable solutions.

4.2 FORM, DESIGN AND LAYOUT

The footprint design represents the shape of a Kestrel bird. The centre of the building represents the main body of the bird with two wings projecting outwards. The blocks in each wing are set at 90 degrees to represent the wing structure when the bird is in flight. The main hall off of the central body represents the tail of the bird. One wing provides shared spaces, teaching areas and hydrotherapy pool and the other the 6th form and respite centre.

The ground floor comprises of the main shared areas, staff areas, visitor areas and respite centre. Many of the rooms take advantage of the 90 degree staggered footprint to bring in the natural daylight. The first floor comprises of the main teaching spaces, staff areas and shared areas. The first floor footprint covers only the main body and part of the two wings, instead of making the whole building one mass. This reduces the building's impact on the residential housing bordering the east and west sides of the site.

The rear external areas are divided by the main hall which protrudes out from the rear body of the building. This gives the two wings their own designated external areas, which of importance for how the school will function, and to offer the pupil's different zones to use to suit their needs.

4.3 PARKING

The proposed site is in proximity to several bus, railway services and cycle routes which provides links to the town centre and wider Luton area. This is also reviewed and considers as part of the Transport Statement, included as part of this planning application.

However due to the nature of the pupil's attending the school, they are collected and dropped off using school buses, which have an allocated one way collection point in front of the school entrance to provide a secure and safe area.

The main parking area is of a semi-circular shape, this follows the symmetrical frontage of the school. The drop off and pick up area follows parallel to the back of the parking area. Additional parking of a more traditional layout is provided off of the two wings. These include the disabled and visitor spaces on one side and allowing for the refuse collection on the opposite side.

In additional to this there are also electric car charging points introduced within some of the car parking spaces

4.4 EXTERNAL SPACE

The main external playground is to the rear of the proposed building, running along the southern border of the site and is partially divided by the main hall. Within the playground there will be an open tarmac surface for various multi-use games and activities. Then to the perimeter there will be zones of specialist outdoor play equipment and shelters/ canopies that the pupil's can use. To the perimeter of the site there will be grass sward areas with trees and landscaping to provide biodiversity.

The outdoor space is an essential part of a SEN school. Physical exercise is an essential part of the student's wellbeing, with activities such as growing vegetables or planting flowers forming part of the school day activities. These also create an essential calm area for the pupil's to use.



Proposed Site Plan

4.5 LANDSCAPE

A preliminary 'Landscape' scheme has been indicated on the site plan, and can be read in conjunction with the Preliminary Ecological Appraisal, that highlights the type of planting that could be incorporated to enhance the biodiversity of the site, as identified under Section 2.2 of this Design & Access Statement.

We would seek that the submission of more detailed proposals be dealt with by way of a planning condition to any subsequent consent, where a co-ordinated Planting Scheme & Maintenance Plan would be submitted for approval.

Trees are proposed to create a softer, green urban setting which will maintain the character of the site. As trees mature, they help moderate the micro-climate and create pools of shade and light. The trees will create a more visual amenity that adds character to the place. Due to the low value of the existing trees it is proposed that these be removed and replaced with additional planting as described above. The site is not located within a specific designated area or have any Tree Preservation Orders trees on this site.

4.6 AMOUNT

The confirmed areas are as follows:

- Total site area of the proposed School Land is 12404 sqm (3.065) acres.
- The gross external footprint of the Ground Floor is approx. 2386 sqm (which includes approx. 647 sq m gross external footprint for the Respite Area) and the First Floor gross external footprint is approx. 1455 sq m.

- The rear playground, including the landscaped areas up to the site boundary is approx. 5400 sqm, the land on both sides of the building up to the rear car park security fence is approx. 618 sqm, which leaves the remaining front of the site, which is allocated to providing access, car parking, refuse facilities as well as the drainage basin and landscaping, as 4000sqm

4.7 BOUNDARIES

The proposal will use all of the space the current site possesses. The boundary is shown in red on the aerial site plan.

The edges of the site bordering the residential housing will be protected using a metal security fence to suit the school's requirements. The existing timber fencing to the rear gardens of the residential houses will remain, with the proposed security fence located as close as possible within the proposed site. The border with Kestrel Way will also have a security fence in an arrangement with sliding vehicular gates to maintain the site security to the perimeter. In addition to this the internal bus drop off and pick up area will also be enclosed using a mesh fence style to create a safe segregated space to the general car park.

5. SUSTAINABILITY

5.1 THE APPROACH

The proposed design takes a sustainable approach by incorporating targeted BREEAM credits to achieve a “Good” minimum rating, as well as complying with the current Building Regulations and will look to go beyond where possible. We will seek to provide a building which incorporates the follow strategies.

- High levels of thermal insulation to reduce heat loss and solar gain.
- Thermally broken uPVC windows and doors with low E double glazing to minimise heat losses and maximise natural daylight into the building (reducing reliance on artificial lighting).
- Low energy lighting internally & externally.
- Air source heat pump heating.
- Solar photovoltaic (PV) panels.

5.2 FLOOD RISK

The risk and impact of flooding will be minimised through:

- Directing new developments to areas with the lowest probability of flooding
- Ensuring that all new development addresses flood resilience, the effective management of flood risk including opportunities for appropriate dry access for emergency vehicles.
- Ensuring that development does not increase the risk of flooding elsewhere including cumulative impact on adjoining and surrounding land and in the wider catchment.
- The proposed drainage strategy will comprise of permeable paving with a detention basin and offline cellular storage, where site conditions allow. Sufficient to accommodate all storms up to and including the 1 in 100 year plus 40% climate change event.
- Ensuring wider environmental benefits of development in relation to flood risk and contribute towards delivering “good ecological status”.

On the Environmental Agency flood risk maps, the site falls with Flood Risk Zone 1. This demonstrates the site as being highly sustainable and considered to have little chance of flooding in any year. However the development seeks to further minimise the effects of any surface water runoff by incorporating permeable paving and or SUDS as identified in the specialist consultants reports

5.3 RECYCLING

Recycling and sustainable refuse storage and collection are addressed in two ways:

- Day to day recycling
- Long term recycling

The refuse collection service and strategy can be adopted for this site by the end user as a commercial school site. The proposed site entrance provides sufficient vehicular access to allow a refuse vehicle to access the site and exit in a forward gear. On a day to day basis the bins will be stored in an easily accessible area on site but also concealed to avoid the bins looking unsightly, along with a turning head and vehicle space requirements for the refuse lorry to park adjacent to the bin store.

Internal provision by way of separate recycling bins reflecting the Councils collection policy will be provided around the site. The goal for this development is to maximise savings in energy consumption, waste management and to promote a more sustainable lifestyle for the end users. In the longer term, the materials selected will seek to achieve durability and recyclability and will be, where possible, sourced locally.

5.4 DESIGN PRINCIPLES

U-Values (W/(m²K))

The energy strategy seeks to ensure that the development has an operational CO₂ emissions performance that meets or exceeds the requirements of 2023 Building Regulations Part L. In order to test this performance, the development has been modelled in iSBEM software, the results of which are identified within the Energy Report

In conjunction with this a variety of renewable energy technology has been assessed and identified as being able to be incorporated within this project including photovoltaic panels on the roof.

In conjunction with this a BREEAM assessment has been carried out so that a minimum rating of “Good” can be achieved.

Air Permeability

Combating air leakage plays a big part in ensuring a building performs efficiently. To achieve this, the school is to be constructed to achieve an air permeability of 3.0m³/(h·m²) @ 50Pa. The school will to be pressure tested prior to completion to confirm the air permeability.

Design Temperatures °C

Internal air temperatures are to be as follows to maximise plant efficiency and comfort, but are subject to completing the energy calculations and the design of the proposed system.

Winter time – 21degC +/- 2,

Summer – 24degC +/- 2,

Hydrotherapy Pool water 32-35degC, Pool air 32degC

Air Quality

A qualitative air quality assessment for the proposed new SEN School has been prepared with reference to existing air quality in the area and relevant air quality legislation, policy and guidance.

The approach taken for assessing the potential air quality impacts of the proposed development site may be summarised as follows:

- Review of relevant policy;
- Consultation with the local authority;
- Baseline characterisation of local air quality;
- Qualitative impact assessment of the construction phase of the development;
- Qualitative assessment of air quality impacts during the operational phase of the proposed development using the 2017 EPUK-IAQM guidance; and,
- Recommendation of mitigation measures, where appropriate, to ensure any adverse effects on air quality are minimised; and
- Identification of residual impacts from the proposed development.

A copy of the report has been provided for review which present the findings of an assessment of the relevant policies, existing/baseline air quality conditions and qualitative consideration of potential air quality impacts during both the construction and operational phase of the proposed development. The potential impacts on local air quality have been considered and, where appropriate, mitigation measures have been recommended.

Air quality monitoring and the estimated background concentrations suggest that no exceedances of any of the relevant air quality objectives are likely, and air quality is likely to be well within the objectives. With the overall proposed development not likely to increase exposure to poor air quality and the impact of ambient air quality on the receptors introduced is likely to be insignificant.

In additional a 'Prerequisite – Indoor Air Quality Plan' has been provided in relation to BREEAM Credit Hea 02, with recommendations made in this assessment have been informed by a review of likely ambient air quality, specifications and plans and correspondence with the client.

Daylight & Sunlight

The analysis has been carried out in accordance with the methodologies contained in the Building Research Establishment's Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (2022) (known as the "BRE Guidelines").

The analysis shows that none of the surrounding residential properties will experience noticeable changes in daylight and sunlight as a result of the proposed scheme, given that the nearest properties in all directions meet the 25°test.

Following the analysis of the internal spaces, 48 rooms were analysed for daylight. Of the 48 rooms, twenty meet the 2% ADF target value, which meets the target value or 43.9%. 46 out of 48 rooms meet the second criterion in that 80% of their room area can see the sky. 47 out of 48 rooms meet the third criterion i.e. the room depth test. Due to some of the rooms being used for computer works or located adjacent to an external building canopy, therefore the proposed BREEAM daylighting credits will not be targeted.

Overheating

As part of the building design review a consultant was appointed to carry out a dynamic simulation model to assess various criteria required as part of the TM52 & BB101 overheating requirements.

The model can only be assessed using a natural ventilation system, which is provided by external windows as an additional control measure.

The results of the compliance analysis show that should the design remain as presented, does not meet overheating risk compliance checks.

Several alternative scenarios have also been reviewed with:

- Less glazing;
- Increased insulation;
- Additional natural ventilation; and
- External shading, louvres, and overhangs.

From these additional calculation checks, the reduction of glazing has made the greatest impact in reducing overheating, and when combined with external shading a compliant free running building is almost achieved. However, many rooms still fall short of the criteria check levels and so it is suggested that alternative measures should be sought for managing the risk of overheating with the current design.

Following an overheating analysis of the proposed building, it may be necessary to include mechanical cooling measures. Due to the varying and specific requirements of the building users (Kestrel Way School will be a Special Educational Needs School), it is necessary to have a regulated and controllable environment. Natural ventilation alone may not be sufficient to meet the requirements of the building users. Therefore, a more detailed overheating analysis will be undertaken at the detailed design stage, once a contractor is appointed, so that Part L of the building regulations will be met, as well as the needs of the building users.

Noise

An acoustic consultant has been appointed by LBC to carry out a noise impact assessment for planning purposes, to quantify the current noise climate across the development site, and at nearest noise sensitive receptors (NSRs) to the proposed development;

- Present appropriate noise impact assessment thresholds to inform design criteria derived from local and national guidelines;
- Assesses the potential noise impacts associated with the proposed development on the surrounding NSRs;
- Specify any outline control measures where necessary; and
- Define the appropriate acoustic performance standards for the school with regard to site suitability.

These works were carried out in accordance with British Standard 4142:2014+A1:2019 'Methods for rating and assessing industrial and commercial sound' & BS 8233:2014 'Guidance on Sound Insulation and Noise Reduction for Buildings' (BS 8233). As well as taking into account the Building Bulletin 93 'Acoustic design of school: performance standards' & Building Regulations Approved Document E, of which a report has been provided for review.

The BREEAM pollution category seeks to avoid or reduce the impact of external noise from the building by reducing the likelihood of noise arising from fixed installations on the new development affecting nearby noise-sensitive buildings. Therefore the BREEAM Credit POL 05 Reduction of noise pollution has been targeted.

A baseline noise survey was undertaken to establish baseline conditions across the proposed development site and at the surrounding noise sensitive receptors. Noise measurements comprised of a combination of attended measurements and unattended noise measurements throughout continuous daytime and night-time periods

The results of the survey indicate noise levels incident upon the façade of the proposed new building will typically be between 51 to 54 dB LAeq,30min during school hours. On this basis, the target indoor ambient noise levels can be achieved through implementation of the ventilation strategies currently proposed.

The type, quantity and location of fixed mechanical and electrical plant associated with the proposed school has not been defined at this stage in the design and hence it is not possible to quantify the noise impact at the nearest noise sensitive receptors. Based on the outcome of the survey, suitable rating noise limits have been provided for fixed plant installations to meet the requirements of the Luton Borough Council. Appropriate mitigation measures to meet these limits will be determined as the design develops.

Energy/ Part L Compliance + EPC

An independent energy consultant has been appointed to review and carry out an energy assessment, of which the statement sets out the proposals that could be adopted to ensure that the development meets and exceeds the Building Regulations 2021 with regard to CO2 emissions and to further reduce those emissions by 10% through the use of renewable energy technology.

Building Regulation Approved Document L2 will be the base document used to provide design stage SBEM calculations, with an EPC issued to building control on completion of the project. So a preliminary calculation has been prepared to assess the proposed building at the Planning Stage. Then a further full set of installed SBEM calculations will also be carried out at the end of the project to give evidence of building control compliance.

The building's energy assessment reviews the various renewable energy technologies along with discussing the SBEM results, overheating calculations, as well as considering the chosen BREEAM targets/ requirements.

This could be achieved by the following possible solutions as set out below:-

- Air source heat pump.
- Heat recovery mechanical ventilation
- Photovoltaic panels
- Electric vehicle charging points

5.5 M&E SERVICES

To limit environmental impact, the design will consider the use of alternative renewable energy sources, for example photovoltaic panel. The school will also be thermally efficient to reduce the heating demand and thus reduce energy consumption.

The heating system will take on the users requirements and designed in a way so that this can be controlled by the user, but ensuring that the system runs efficiently systems.

Hot water will be instantaneous generation or localised storage with mixing valve to supply blended hot water. Main kitchen dining area will have storage by the heat generation plant. Hot water flow whereby a high efficiency thermal store will be installed.

Cold water will be provided directly from the local water main with no storage required. A booster set with a break tank is required in order to generate sufficient pressure to serve the rooms on the first floor. Water flow restrictors will also be installed to all outlets to reduce the amount of water used and waste produced protecting the environment and saving money.

Low energy LED luminaires with an efficacy greater than 40 lumens per circuit watt will be used in the school where possible. Classrooms and shared spaces will be fitted with fixed low energy LED luminaires.

6 TRANSPORT

6.1 MEANS OF TRANSPORT

The development does not have any existing pedestrian through routes, however separate pedestrian access is provided onto and within the site. The thoughtful selection of surface materials will help to delineate between pedestrian and vehicle areas.

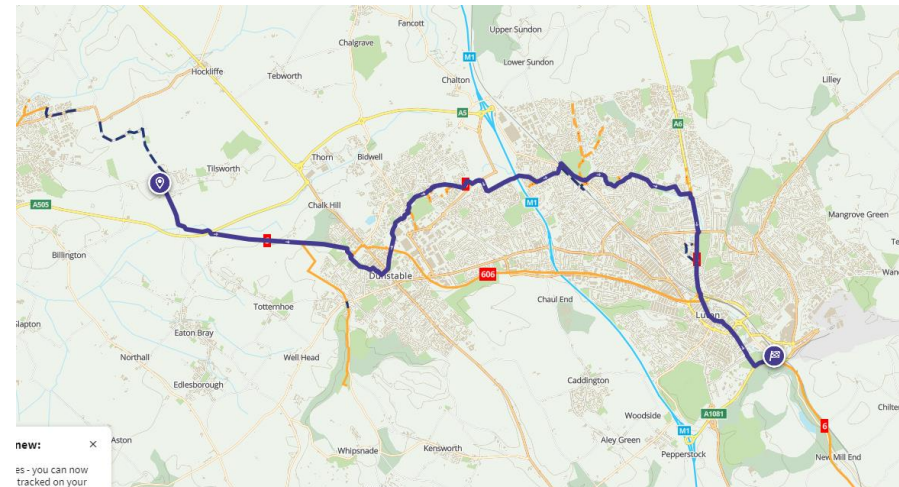
As stated previously, the scheme provides onsite parking provisions for staff, visitor and disabled parking and also provides an allowance for electric vehicle charging, which also meets with Luton Councils parking standards.

There is a bus stop outside the school frontage on Kestrel Way. The Leagrave Railway Station is just over 2 miles away and can be accessed by either cycling (12 min journey) or walking (40 minute journey). Both of these offer alternative methods of using public transport to gain access into Luton and further afield.

The National Cycling Network sustans route is also another good alternative that can be used to travel through Luton, as well as other local traffic free or on road routes for either pleasure or commuting reasons as indicated by the extract from the Luton Cycle Map Network.

In addition, the need for cycle storage in the design of the new school has been reviewed with cycle hoops indicated to the front of the entrance as well as a covered cycle area to one side to allow further options of travel for the building users.

A transport consultant has also reviewed the proposed scheme in conjunction with a traffic survey to analyse the impact of the vehicular movements along with levels of accessibility and highlight the sustainable modes available.



Extract from network of cycle route map

7 ACCESS STATEMENT

7.1 APPROACH

The aim of the new scheme is to provide a building in accordance with the requirements of Part M of the Building Regulations (Approved Documents). The proposals take into consideration current legislation in regard to full access for people with limited mobility, hearing or vision impairment. This will be extended to the selection of materials, colours and way finding, whether by foot, aided transport or vehicle.

In addition to this and to meet with the pupil's special needs as well as the school's operating requirements, additional design requirements will be incorporated such as hoists, extra wide doors and flush access to all external doors.

As to access onto the site, new vehicular access will be provided with a separate entrance and exit point, to improve the pick-up and drop off routine that the school buses provide. Two pedestrian access routes will run along either site boundary, past the car park and provide access to the front of the school building, which would enable all persons of varying abilities to access the site/building.

8 CONCLUSION

8.1 SUMMARY

The scheme seeks to provide much needed Special Educational needs provision in response to meeting the demand of the increasing number of educational health care plans (EHC) within the Luton Borough, so that the existing limited Secondary SEN Schools can be supported, with a new SEN Secondary School provision, of which is located within an area of Luton to offer an improved catchment area that will be created.

The development whilst drawing on precedent and surrounding context, seeks to provide new SEN learning space which contribute and enhance, rather than detract from the street scene, with care has been taken to the selection and choice of materials, massing, form, style, appearance and integration with surrounding buildings, but also provides its own design & identity. Taking a contemporary approach to traditional architectural detailing, utilising a simple pallet of materials, and having an ambition to go beyond the minimum, as a part of an overall team of consultants reviewing the design and implications on the site.

Sustainability issues addressed in line with national and local plan guidelines, by the use of alternative sustainable transport links that are available and that the local infrastructure can support the proposed development. The site also supports the Ecology measures, to protect and enhance the existing ecological habitat, by also incorporating a native planting landscaped scheme and maintaining a significant amount of open space. From the involvement of the drainage consultant, the site has been identified a low flood risk, with the surface water design proposal to include as much natural attenuation in the form of a swale that can be incorporated. Following the return of the various consultant's reports, these have highlighted the options available, as well as concluding that this planning application is supported by their findings.

The scale and massing has been addressed by proposing a 2 storey school that complements the sites topography, while allowing access for all and meeting the needs of the users to provide important external activity space. The footprint design not only relates to the shape of a Kestrel Bird, but also provides a various number of important support rooms that are required as part of a SEN School. The building energy efficiency and proposed targets have been identified with a minimum BREEAM "Good" rating targeted.

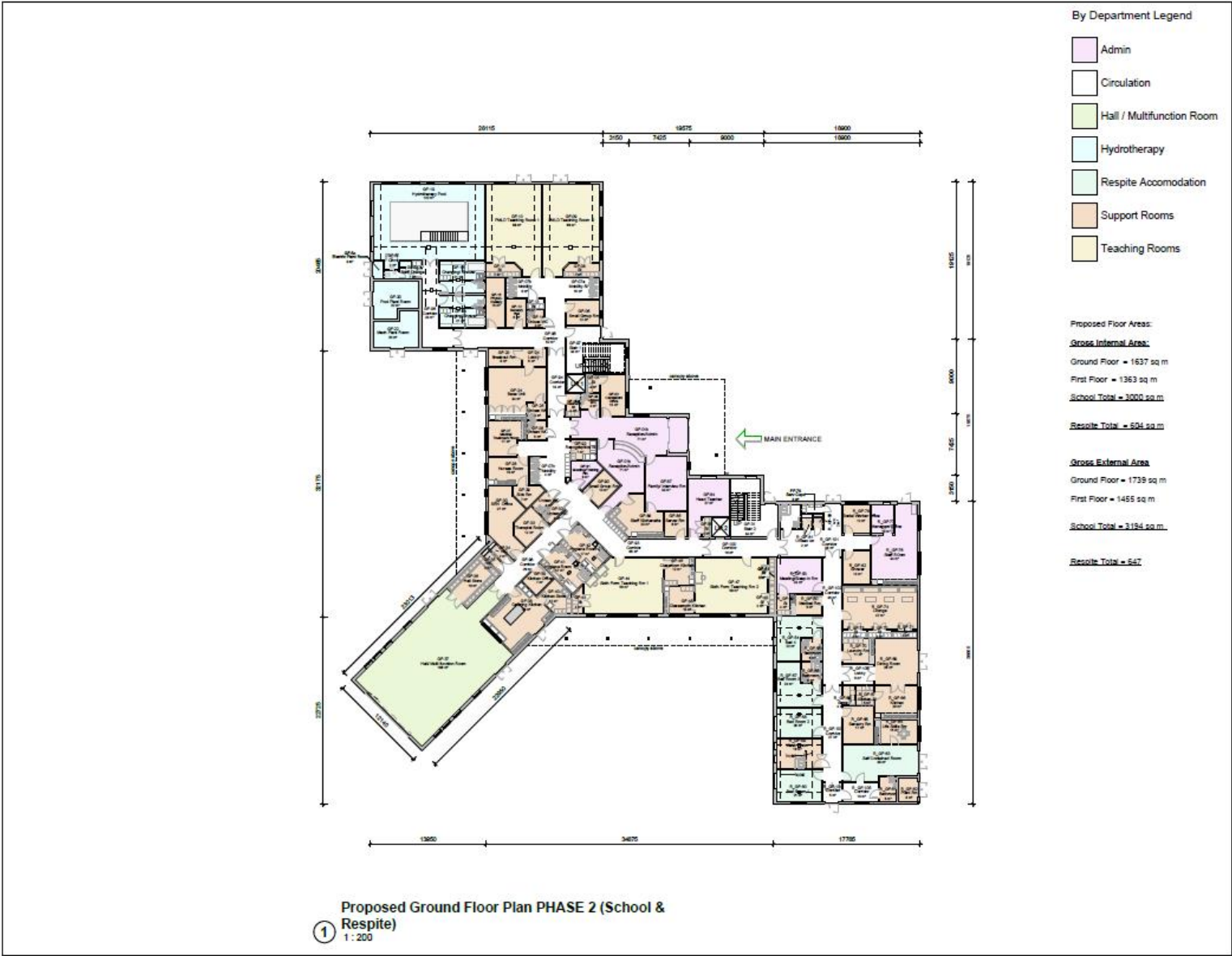
Having considered all relevant Planning Policies, reviewing the proposed scheme, with an initial pre-planning application and taking this forward with the design team consultants as well as consulting with various stakeholders and the public. We believe that our proposal has merit and will complement the Lewsey area and believe this scheme should therefore be deemed as acceptable and benefit from a favourable determination,

9.0 APPENDICES

9.1 Appendix A – Proposed Design Drawings



Site Plan

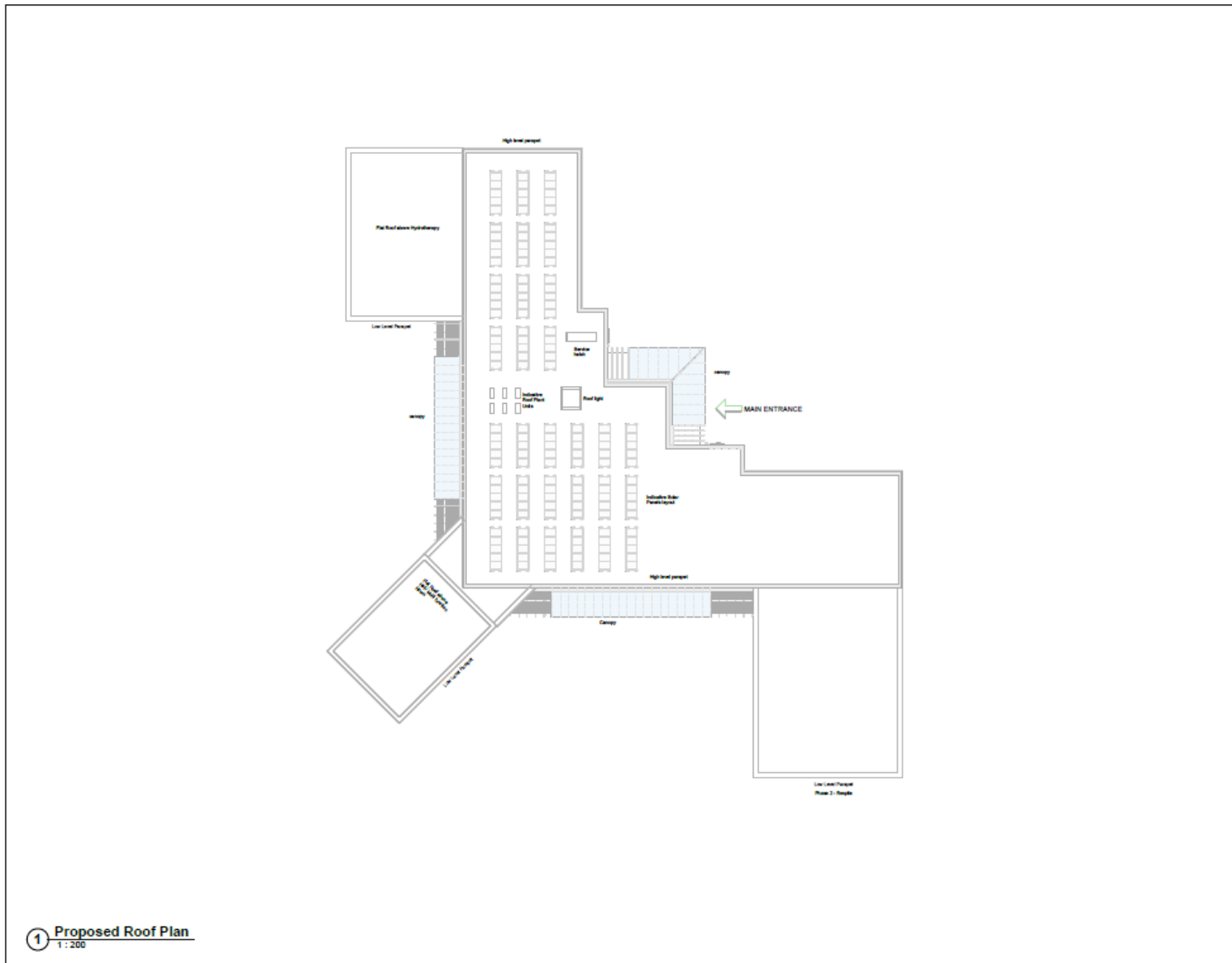


Ground Floor Plan



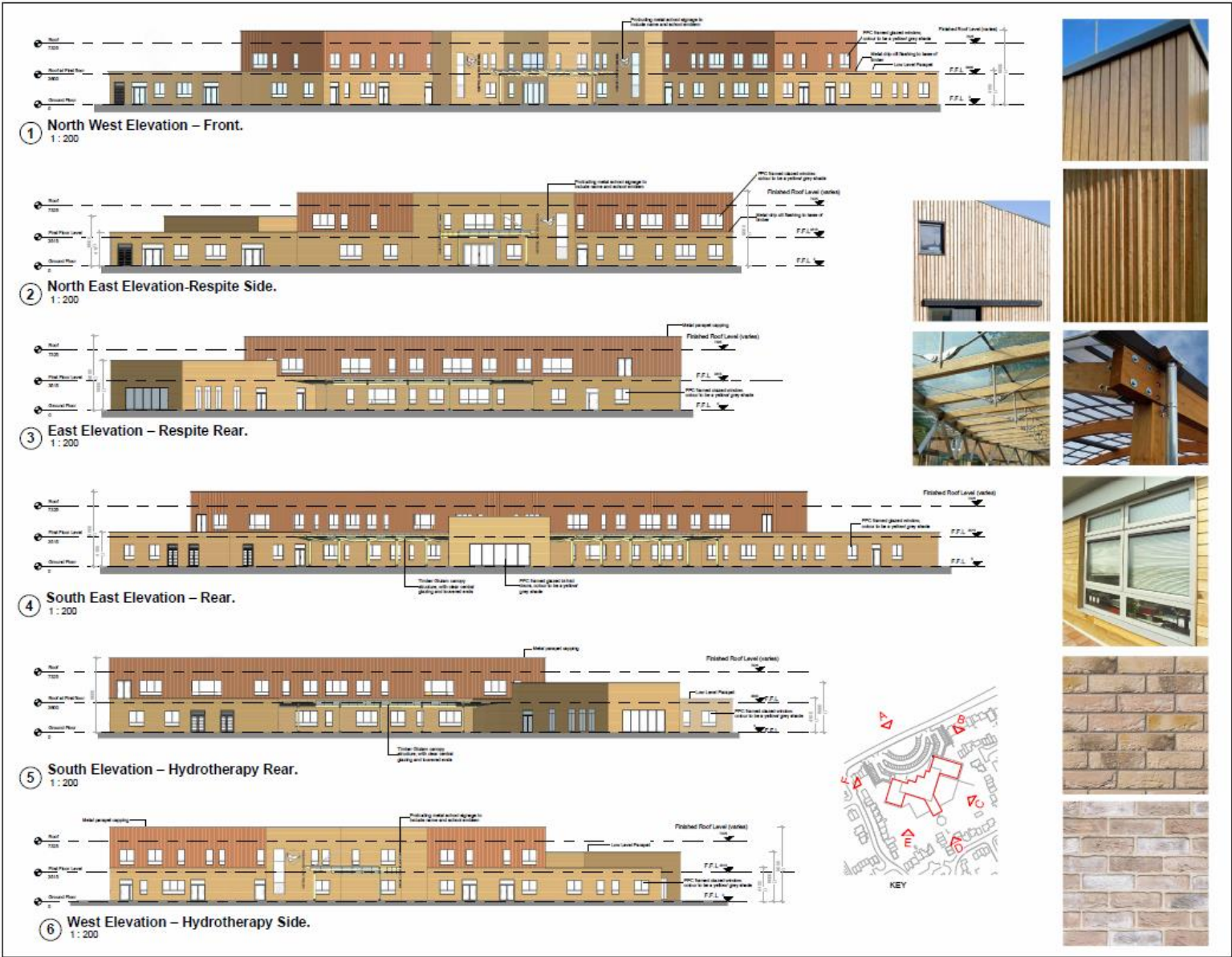
First Floor Plan

LBC / LAND AT KESTREL WAY SEN SECONDARY SCHOOL
KESTREL WAY, LUTON
PLANNING, DESIGN & ACCESS STATEMENT – SECONDARY SEN SCHOOL



1 Proposed Roof Plan
1:7,200

Roof Plan



Building Elevations

9.2 Appendix B – Public Consultation Information



Invitation to Public Consultation Event

Luton Borough Council’s plans are emerging for an exciting new Special Educational Needs secondary school in Lewsey.

Luton Borough Council wants to hear your views on the proposal for a new Special Educational Needs (SEN) secondary school on Kestrel Way, Lewsey. The new school will provide outstanding educational facilities, creating an environment where pupils can thrive and their wellbeing is prioritised.

Luton Borough Council is designing the school to educate up to 112 pupils across 14 teaching classrooms, to meet the borough’s increased demands for SEN provisions. Specialist provisions include a hydrotherapy pool, support rooms and external play areas. The design also incorporates the option for a further phase including provision for a respite centre.

The scheme would see the site’s existing radio telecommunications mast be replaced with a sustainably constructed and attractive new SEN secondary school with landscaping improvements. Luton Borough Council invites you to join them at an event where you can engage with the proposals, meet members of the design team, ask any questions and provide feedback.

For more information, please visit:
www.lutonsenschool-kestrelway.com



Invitation Leaflet & Poster



Invitation to Public Consultation Event

Luton Borough Council’s plans are emerging for an exciting new Special Educational Needs secondary school in Lewsey.

Luton Borough Council wants to hear your views on the proposal for a new Special Educational Needs (SEN) secondary school on Kestrel Way, Lewsey. The new school will replace the existing radio telecommunications mast on the site, provide outstanding educational facilities, and create an environment where pupils can thrive and their wellbeing is prioritised.

Have your say...



Wednesday 1 November 2023
 3pm - 7.30pm



Lewsey Community Centre
 Landrace Road
 Luton
 LU4 0SW



Saturday 4 November 2023
 9am - 1pm




Comments on the proposals can be provided until 15 November 2023.

For more information, please visit:
www.lutonsenschool-kestrelway.com



Public Consultation Display Boards



Kestrel Way, Lewsey 1: Introduction




Proposed rear view



Welcome to this exhibition about Luton Borough Council's emerging plans for a new Special Educational Needs (SEN) secondary school on Kestrel Way, Lewsey.

The proposed SEN secondary school will be designed to provide quality educational and specialist provisions to meet a need for new SEN facilities (Years 7 to 13) where pupils can thrive and their wellbeing is prioritised.

The Council is proud to be designing and leading the scheme and is excited to share its emerging ideas and **hear your views before finalising and submitting a planning application.**



www.lutonsenschool-kestrelway.com


Kestrel Way, Lewsey 2: Site and Context



Site location map

The one hectare site at Kestrel Way is Council-owned. The site is north of the Birds Estate within the suburb of Lewsey, approximately 5 km from the town centre of Luton. It is close to the Woodside Link road and the boundary to Central Bedfordshire. Site access is from Kestrel Way to the north.

The site is occupied by a 60 meter radio telecommunications mast with cabling. An associated service store is located in the north-west corner of the site. The site has no heritage constraints nor any other environmental designations.

The surrounding development is:

-  Predominantly residential housing: at Coldsfoot Green to the west, Ravenhill Way to the south-east and Fieldfare Green to the south
-  Neighbourhood businesses offering a range of local services
-  Lewsey Park is south of the site and provides access to the River Lea, woodland and wetland areas. Lewsey Park features allotments, sports pitches and playing fields

The site benefits from sustainable transport links including a bus stop immediately to the front of the site and a shared cycle footway on Kestrel Way.

The early designs were discussed with the Council through its pre-application service in 2022, receiving a positive response and **confirmation that the proposed educational use is acceptable in principle.**




Kestrel Way, Lewsey 3: Project Brief and Aims



Proposed lower gate view

Luton Borough Council is committed to supporting and developing education provision for all of Luton's children and young people so they can achieve their full potential and aspirations.

Luton has two existing SEN secondary schools, one located in the Town Centre and the other in the north of the borough. Current pupil projections for Luton indicate there is a shortfall in SEN secondary school places for 2024 and Luton's mainstream schools are under more pressure to provide for the needs of SEN students. The proposal will help to meet this demand and the diverse needs of young people in Luton.

Project aims:

- Contribute to the Council's statutory education duties**
Including securing sufficient school places in the borough and provision for children and young people with SEN in Years 7 to 13
- Support a range of special needs**
including profound and multiple learning difficulties (PMLD), severe learning difficulties (SLD) and autism or autism spectrum disorders (ASD). Pupils may have other complex needs which can include physical, sensory and communication impairment.
- Creation of specialist provisions**
including a hydrotherapy pool, support rooms and external play areas
- Sensitive building design**
including building scale relative to the surrounding residential area, high-quality and distinctive appearance, and landscaping
- Environmental sustainability**
promoting energy efficiency, minimising carbon emissions, encouraging sustainable transport and protecting the local environment.



Kestrel Way, Lewsey 4: The Proposal



Site plan

Key:

- 1 Main entrance
- 2 Exit
- 3 SEN Secondary School Building
- 4 Dedicated School bus lane and drop off areas
- 5 Playground
- 6 Play zone
- 7 Landscaping
- 8 Swale/Pond
- 9 Parking
- 10 Cycle Parking
- 11 Disabled Parking
- 12 Refuse Unit
- 13 Air Source Heat Pumps Enclosure

The proposal is to provide a new two storey SEN secondary school to educate up to 112 children, along with external play areas and parking provision.



Proposed front view

Design and key features

- Inspired by Kestrel Way, a distinctively designed building footprint representing the shape of a Kestrel
- Layout will enable good levels of daylight to enter the school's rooms
- 14 teaching classrooms
- Multi-purpose hall in the centre of the school
- A specialist hydrotherapy pool
- The possibility for a respite centre to be developed in the future
- Purpose designed outdoor play areas, zones of specialist equipment and open space for various multi-use games and activities
- Staff car parking, dedicated disabled parking bays, electric vehicle charging points and cycle parking. It is likely that buses will be the primary form of transport for pupils. Students would be dropped off and collected within the site.



Kestrel Way, Lewsey 5: Other Environmental Considerations



Proposed gate perspective

Sustainability

The building will:

- Be designed to balance solar gain, with suitable thermal insulation of the building
- Be heated using air source heat pump
- Use renewable energy provided by solar photovoltaic panels on the flat roof
- Be built from sustainable materials including a mix of timber composite cladding and bricks

Drainage

- Flood risk from all potential sources is low across the site
- The proposed sustainable drainage strategy includes permeable paving, attenuation tanks, and a detention basin

Landscape and ecology

- The existing site has low ecological value. The proposed scheme will provide a biodiversity net gain, incorporating a swale or pond with native pond flora and bat boxes
- New tree planting will create a softer, green urban setting. Low value trees will be replaced with more mature, native tree species

Transport


- Minimal travel to and from the site outside of morning children drop off times and afternoon collection times
- Estimated to generate 123 two-way vehicle movements during the morning peak network hour (8am - 9am) and 96 two-way vehicle movements in an afternoon peak hour of 3pm - 4pm (earlier than typical network peak between 5pm - 6pm)
- Transport assessment does not anticipate a material impact on the local highway network




Swale/ pond



Roof PV panels




Kestrel Way, Lewsey 6: Next Steps



Thank you for attending our exhibition.


As a Local Authority we want to ensure Luton offers outstanding, quality first education that meets the full range of children's needs, complemented by specialist local provision for those children with the most challenging and diverse needs. Luton's children and young people are the future of the town and we want to give them the best possible opportunities.

We are keen to understand what you think of our proposal for Luton's new SEN secondary school before we finalise our plans and submit a planning application in Autumn 2023.





Members of our team are here to answer your questions. We would be grateful if you would complete a hard copy of our survey, or you can scan the QR code to complete it online.

You can also email us directly at:
luton.senschool@litchfields.uk




This consultation will close on 15 November 2023

www.lutonsenschool-kestrelway.com

Public Consultation Feedback From



**Kestrel Way, Lewsey
Feedback Form**

1 Do you agree it is important to provide new Special Educational Needs (SEN) secondary school places to address the projected shortfall?
 Yes No Undecided

2 Do you support providing a SEN secondary school at the site?
 Yes No Undecided

3 To what extent do you agree that the proposed SEN secondary school will create a high-quality learning and teaching environment?
 Strongly agree Agree Neutral Disagree Strongly disagree

4 Are there any specific details that you consider are relevant to the proposal and need to be addressed in the application? If so please let us know:




5 Overall, do you support Luton Borough Council's plans for the new SEN secondary school?
 Yes No Undecided

6 If you have any other comments then please provide them below:



Nathaniel Lichfield & Partners Limited ('Lichfields') is registered with the Information Commissioners Office (registration number Z6193122). Your responses will be analysed by Lichfields on behalf of our client The Council of the Borough of Luton. It is not envisaged that any personal data will be supplied by virtue of completion of the survey, but in the event that any personal data is supplied, it will be disregarded and deleted without undue delay. Responses to this consultation may be made publicly available.

Public Consultation Feedback Results




1. Page 1

1. Do you agree it is important to provide new Special Educational Needs (SEN) secondary school places to address the projected shortfall?				
Answer Choices			Response Percent	Response Total
1	Yes		60.00%	6
2	No		30.00%	3
3	Undecided		10.00%	1
			answered	10
			skipped	0

2. Page 2

2. Do you support providing a SEN secondary school at the site?				
Answer Choices			Response Percent	Response Total
1	Yes		60.00%	6
2	No		40.00%	4
3	Undecided		0.00%	0
			answered	10
			skipped	0

3. Page 3


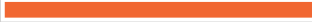
3. To what extent do you agree that the proposed SEN secondary school will create a high-quality learning and teaching environment?				
Answer Choices			Response Percent	Response Total
1	Strongly Agree		40.00%	4
2	Agree		20.00%	2
3	Neutral		40.00%	4
4	Disagree		0.00%	0
5	Strongly Disagree		0.00%	0
			answered	10
			skipped	0

LBC / LAND AT KESTREL WAY SEN SECONDARY SCHOOL
KESTREL WAY, LUTON
PLANNING, DESIGN & ACCESS STATEMENT – SECONDARY SEN SCHOOL

4. Page 4

4. Are there any specific details that you consider are relevant to the proposal and need to be addressed in the application? If so please let us know:			Response Percent	Response Total
Answer Choices				
1	Open-Ended Question		100.00%	8
1	01/11/2023 15:32 PM ID: 230415393	What are the plans for boundary fencing?		
2	01/11/2023 15:55 PM ID: 230418890	A good Traffic plan will need to be thought through as it will mean a higher level of cars coming through the estate and already some cars come too fast near children playing		
3	02/11/2023 11:55 AM ID: 230500076	To make sure there is plenty of Parking for staff and users of the school. The proposals appear to be well thought out.		
4	04/11/2023 12:35 PM ID: 230625535	The ability for all local residents to park easily at all times at the front of their houses.		
5	04/11/2023 12:58 PM ID: 230628195	I visited the consultation earlier and talked with the representatives. My one concern was parking , not for the students but the support workers. This was covered. The schools design is very good and will have tremendous facilities which luton desperately needs. Plus the open fields nearby will be lovely for the students to visit for the walks and nature.		
6	04/11/2023 15:21 PM ID: 230632755	As the heating system will be next to houses and gardens it should be silent so as not to impact on local residents quality of life.		
7	06/11/2023 20:32 PM ID: 230769389	Existing covenant stating no construction on the site. Noise implication.		
8	11/11/2023 11:45 AM ID: 231171908	No building work to be done at weekends in order to respect the local residents' quality of life		
			answered	8
			skipped	2

5. Page 5

5. Overall, do you support Luton Borough Council's plans for the new SEN secondary school?			Response Percent	Response Total
Answer Choices				
1	Yes		60.00%	6
2	No		40.00%	4
3	Undecided		0.00%	0
			answered	10
			skipped	0

6. Page 6

6. If you have any other comments then please provide them below:			Response Percent	Response Total
Answer Choices				
1	Open-Ended Question		100.00%	3
1	02/11/2023 11:55 AM ID: 230500076	Have you considered sending leaflet/information to the residents of Kestrel Way to let them know the proposals as the consultation does not appear to be well known in the area. The design looks attractive and in keeping with the surrounding area.		
2	04/11/2023 12:58 PM ID: 230628195	I really hope the development gets planning and is able to go ahead. Certainly it gets my support		
3	05/11/2023 09:03 AM ID: 230661236	Working in a secondary school in Luton, I see daily the need for this specialist provision, watching SEN pupils struggle in mainstream school		
			answered	3
			skipped	7