



Report to East Area Planning Committee

Application Number:	PL/22/0835/FA
Proposal:	Erection of a temporary day nursery unit (Use Class E(f)) for a period of three years
Site location:	The Beacon School Amersham Road Chesham Bois Buckinghamshire HP6 5PF
Applicant:	The Beacon Educational Trust Ltd
Case Officer:	Margaret Smith
Ward affected:	Amersham and Chesham Bois
Parish-Town Council:	Chesham Bois Parish Council
Valid date:	18 March 2022
Determination date:	17 June 2022
Recommendation:	Refuse Permission

1.0 Summary & Recommendation/ Reason for Planning Committee Consideration

- 1.1 This application is for the erection of a temporary day nursery unit catering for 20 children and a maximum of 4 full time equivalent (FTE) members of staff, for a period of 3 years.
- 1.2 The proposed unit would operate from 09.00 to 15.00hrs Monday to Friday, during school term times (the main school hours being 08.00 to 16.00hrs).
- 1.3 The proposed unit would measure approximately 18m x 10m and would have a flat roof at about 3.5 metres. The unit would be access by way of access ramps on the north and west elevations.
- 1.4 The submitted Design and Access Statement states that parents would be expected to access the proposed portacabin from the south car park area.
- 1.5 Cllr Harris has called in this application for a determination by the Members of the Planning Committee regardless of the officer recommendation.
- 1.6 There have been extensive negotiations with the Applicant regarding the objections of the Parish Council and adjoining occupiers regarding existing congestion in and around the school being exacerbated by this proposal. A Travel Plan and a Transport Assessment has been submitted and the Highways Officer has raised no objection to the proposal. However, there is a continuing concern that, notwithstanding the

absence of an objection on highways safety grounds, there are existing congestion problems causing a loss of residential amenity and, as such, an increase in the number of pupils and staff by way of the creation of an additional nursery classroom would be likely to exacerbate the existing congestion in the locality, which would be more detrimental to the amenities of residents in this locality, through disturbance and inconvenience. The application is therefore recommended for refusal on those grounds.

2.0 Description of Proposed Development

- 2.1 Beacon School lies on the western side of Amersham Road, within proximity of Chesham Bois. The site comprises several buildings set within a substantial site. There are 123 parking spaces scattered throughout the site. The site, which was historically known as Bois Farm, includes two Grade II listed (former farm) buildings comprising the gymnasium and house, and the attached dining hall to Beacon School. They provide significant architectural and historic interest to the site and as designated heritage assets themselves.
- 2.2 There is a current day nursery provided within Oakway, a former residential property fronting Chiltern Road to the north of the main school building, comprising 32 children and 4 staff.
- 2.3 This application proposes the siting of a temporary portacabin adjacent to the southern boundary of the site on an existing area of hardstanding, for a period of 3 years and catering for 20 children and a maximum of 4 full time equivalent (FTE) members of staff.
- 2.4 The proposed unit would operate from 09.00 to 15.00hrs Monday to Friday, during school term times (the main school hours being 08.00 to 16.00hrs).
- 2.5 The proposed unit would measure approximately 18m x 10m and would have a flat roof at about 3.5 metres. The unit would be accessed by way of access ramps on the north and west elevations.
- 2.6 The application is accompanied by,
 - a) Design and Access/Planning Statement,
 - b) Transport Assessment, and
 - c) Travel Plan.

3.0 Relevant Planning History

- 3.1 This site has a very lengthy planning history, including the following:

CH/1979/1163/FA Conditional Permission granted on 19.07.1979 for 20m x 8m open air swimming pool below ground level

CH/1992/0220/FA Conditional Permission. Alterations, two storey side/rear extension to provide 3 replacement classrooms, 2 staff flats and staff lounge together with formation of second vehicular access from Oakway and additional parking. Accommodation catered for 32 children and 3 staff.

CH/1997/0256/FA Demolition of detached classroom block and erection of single storey building incorporating four classrooms, library, resources room and ancillary facilities with covered access corridor link to sports hall. Conditional permission.

CH/1998/0199/FA Alterations and single storey extension to south elevation of Jones/Jubilee blocks. Conditional permission.

CH/1998/1000/FA Closure of southernmost vehicular access and construction of new vehicular access and drive and additional parking spaces. Conditional permission.

CH/2000/0942/FA Conditional Permission. Use of one ground floor bedsit as nursery (Variation of condition 9 of planning permission 92/0220/CH) 1 additional member of staff was proposed.

CH/2001/0718/FA. Conditional Permission. Two temporary classroom units for a period of 3 years.

CH/2001/1137/FA: Assembly hall and chapel and rebuilding of old barn and cart entrance, first floor extension over Jones Block, redevelopment of Strong Block to provide single storey drama studio and classrooms, single storey extension to school house, single storey changing rooms building, single storey extension to music room, single storey link extension between beech barn and dining room, two storey extension to dining room and alterations to car park. Conditional Permission. Implemented, but not completed.

CH/2001/1138/HB Assembly hall and chapel and rebuilding of old barn and cart entrance, single storey link extension between beech barn and dining hall and two storey extension to dining hall. Conditional consent.

CH/2001/2068/FA Extension to driveway and parking area and closure of existing and construction of new vehicular access. Conditional permission.

CH/2004/0980/FA Retention of temporary classroom unit until 7th August 2004 (Variation to Condition 1 of planning permission CH/2001/0718/FA). Conditional permission.

CH/2004/0985/FA Detached double temporary classroom unit for a period of 3 years. Conditional permission.

CH/2004/1411/FA: Redevelopment of Strong Block to provide two storey drama studio and classrooms, single storey extension to school house together with foyer between drama studio and school house (amendment to planning permission CH/2001/1137/FA). Conditional Permission. Implemented, but not completed.

CH/2004/1990/FA Retention of detached double temporary classroom unit for a period of 3 years (amendment to planning permission CH/2004/0985/FA). Conditional permission.

CH/2005/1034/FA: Detached double temporary classroom unit for a period of three years.

CH/2005/1135/FA Conditional Permission. Use of ground floor flat as nursery.

CH/2007/1162/FA Change of use of Beech Barn South from residential to office (use class B1) and first floor extension over tractor store to provide residential apartment served by external timber staircase. Refused permission.

CH/2007/1978/FA. Conditional Permission. Retention of detached double temporary classroom unit (renewal of planning permission CH/2004/1990/FA)

CH/2014/0223/FA Conditional Permission. Erection of three temporary portacabins and laying of hardstanding to create additional parking areas.

CH/2015/0820/FA Conditional Permission. Change of use from temporary to permanent use, the existing conversion of residential amenity space associated with White Cottage to staff parking for use by The Beacon School.

CH/2018/0255/FA. Conditional Permission. Modification to The Beacon School car parks including additional hard standings, relocated vehicular and pedestrian entrance, landscaping and lighting.

PL/19/1487/FA. Conditional Permission. 5 existing parking bays to be amended to provide improved parking space and to allow white lining to be rationalised, also improving pedestrian access to car park to and from school grounds. 1 new parking bay for parents, white lining amended to provide 2 disabled parking bays, hardstanding for existing bin store, proposed pedestrian access and fencing and hedging along frontage of North Car Park.

PL/21/3666/VRC Conditional Permission. Removal of conditions 3 (user restriction) and 4 (time restriction) of planning permission CH/1979/1163/FA (20m x 8m open air swimming pool below ground level)

PL/22/1284/FA Conditional Permission. Single storey front/side extension to existing dining block facility, replacement of roof of existing extension and insertion of door.

4.0 Summary of Representations

4.1 The Parish Council has raised an objection and the main concerns are summarised in the Appendix section of this report.

4.2 Letters of objection have been received during this application process from the occupiers of 36 local properties.

5.0 Policy Considerations and Evaluation

Development Plan:

- Core Strategy for Chiltern District - Adopted November 2011:
- Chiltern Local Plan adopted 1 September 1997 (including alterations adopted 29 May 2001), consolidated September 2007 and November 2011.

Other material considerations:

- National Planning Policy Framework (NPPF), 2021.
- National Design Guide, 2019
- Sustainable Construction and Renewable Energy SPD – adopted 25 February 2015
- Buckinghamshire Countywide Parking Standards (2015)

Principle and Location of Development

Core Strategy Policies:

CS1 (The spatial strategy),

CS29 (Community)

Local Plan Saved Policies:

CSF1 (Provision of Community Services and Facilities in the Built-up Areas Excluded from the Green Belt Including the District and Local Shopping Centres as defined on the Proposals Map)

5.1 With regard to building a strong, healthy and vibrant community, paragraph 8 of the NPPF states that planning policies and decisions should provide accessible services and open spaces that reflect current and future needs and support communities' health,

social and cultural well-being. Paragraph 95 also states that Local Planning Authorities should give great weight to the need to create, expand or alter schools through their decisions on applications.

- 5.2 The application site is located within the built up area of Chesham Bois, partly within an Established Residential Area of Special Character.
- 5.3 The submitted Design and Access Statement states that the existing day nursery at this school, which operates from Oakway, provides 20 places for children, which is no longer adequate. This application is for a temporary day nursery unit but the submitted Design and Access Statement also states that 'It is the future intention of the school to redevelop other areas of the main school site for nursery provision within permanent buildings' although it is noted that the acceptability or otherwise of future proposals for building work would need to be assessed and determined by the Council.
- 5.4 In principle, Local Plan policy CSF1 and Core Policy CS29 allow for development for community facilities such as schools, provided that the proposal would not involve the loss of residential land and the proposal would not be detrimental to the character and amenities of the area in which it would be located by reason of its appearance, layout, noise, traffic generation, vehicle parking, loss of landscaping or general disturbance. Consequently, in principle, this proposed development is acceptable, but an assessment also needs to be carried out as to whether or not it would be detrimental to the character and amenities of the area and whether or not all other relevant policies in the Local Plan and/or the Core Strategy would be satisfied.

Raising the quality of place making and design

Core Strategy Policies:

CS4 (Ensuring that the development is sustainable)

CS20 (Design and environmental quality)

CS29 (Community)

CS32 (Green infrastructure)

Local Plan Saved Policies:

GC1 (Design of development)

GC4 (Landscaping)

GC14 (Access for disabled people to developments used by the public)

- 5.5 This application proposes a portacabin unit measuring approximately 18m x 10m and with a flat roof at about 3.5 metres. The unit would be accessed by way of access ramps on the north and west elevations.
- 5.6 In design terms, the proposed unit and access ramps would be simple and functional and no objection is raised in principle to the proposal in this regard.

Amenity of existing and future residents

Local Plan Saved Policies:

GC3 (Protection of amenities)

CSF1 (Provision of Community Services and Facilities in the Built-up Areas Excluded from the Green Belt Including the District and Local Shopping Centres as defined on the Proposals Map)

- 5.7 Policy CSF1 allows in principle for development for community facilities provided that the proposal would not involve the loss of residential land unless it cannot be avoided and it can be demonstrated that the facility is essential and, pertinent to the consideration of this application, the proposal would not be detrimental to the

character and amenities of the area in which it would be located by reason of its appearance, layout, noise, traffic generation, vehicle parking, loss of landscaping or general disturbance and subject to compliance with all other relevant policies.

- 5.8 The Parish Council and local residents have specifically objected to this proposal on the grounds that the existing school causes serious congestion and this proposal would exacerbate that problem.
- 5.9 It is noted that the Highway Authority has raised no objection to this proposal on highway safety grounds, but it is pertinent to note that when considering appeal applications, Inspectors have on occasions differentiated between the highway safety issues raised by congestion and the amenity issues raised by congestion, whether that be for users of the development or for residents in the local area. In essence, it is possible for a development to cause inconvenience for users or local residents without causing a highway safety problem.
- 5.10 It is noted that the school has sought to address problems of congestion by employing a circulation route within the school site for the picking up and dropping off of pupils, and a Traffic Plan and Transport Statement has been submitted during the course of this application. It has also been advanced that some of the prospective nursery pupils may be the siblings of those already attending the school, and that even though the start and finish times for the proposed nursery would differ from that of the main school there would be a minimal increase in traffic generation. The submitted Transport Statement also identifies potential on-street parking spaces that are currently under-used, although local residents have challenged the efficacy of using some of those identified spaces due, for example, to their proximity to road junctions.
- 5.11 In response to officers' concerns regarding apparent congestion problems at school start and finish times the applicant's agent has advanced various points, including the fact that the Buckinghamshire Countywide Parking Standards do not set a specific requirement for on-site parent parking. For clarification, the standards require 1 space per fulltime equivalent (FTE) staff member and additional guidance is also given stating that *'All school and colleges should provide appropriate drop off areas as well as car parking. Drop offs can reduce the need for parking, improve circulation and ultimately reduce congestions problems on local roads around the school'*. As such, it can be argued that appropriate drop off areas are required for pupil's parents rather than on-site parking and that drop offs 'can' reduce the need for parking, improve circulation and reduce congestion problems on adjoining roads, although the objection letters of local residents and the Parish Council clearly state that, despite the existing drop off arrangement at this school, which is monitored by CCTV, congestion problems still remain. As such, it is a concern that a proposal which seeks to introduce more pupils onto this site will be likely to worsen existing congestion problems as not all new pupils will have existing siblings at the school and, the staggering of start and finish times may merely result in parent's vehicles waiting for longer on the public highway while parents drop off and collect nursery children and at a different time drop off and collect their siblings, especially as the drop off and collection of nursery children is usually more time-consuming due to their young age and the need to ensure their safe arrival and collection to and from school.
- 5.12 The applicant's agent casts doubt on the times and days of the photos taken by objectors, and whether or not the recorded cars are those of school parents or unrelated local residents, and it is advanced by the School's agent that there was

extensive parking on Chiltern Road when the school was closed and that some congestion is also likely to be attributable to commuter traffic.

- 5.13 Furthermore, the applicant's agent states that congestion adjacent to the north car park would not be impacted by the proposed nursery, in any event, because the proposed portacabin is proposed to be located to the south of the school site.
- 5.14 It is also advanced by the applicant's agent that it is not uncommon for there to be school traffic around schools and, in some cases, this is dealt with by parking restrictions being placed on roads if the highway authority considers that to be necessary. They state that the Council has the power to impose a parking restriction if that was considered necessary.
- 5.15 The school's agent also informs that with regard to the school's capacity, the Department for Education (D of E) has confirmed that the Beacon School has capacity for 570 pupils, but it is operating well below this figure at present and, even accounting for the places within the proposed nursery unit, the school would not be operating above its D of E capacity figure.
- 5.16 The Highways section has recently given further comments with regard to the congestion concerns raised by the Parish Council and local residents and that full response is recorded in Appendix A. To summarise, the Highways officer reiterates that there is no highways objection and that on-street parking availability and their dimensions would only be an issue if displacement of existing spaces within the school was to occur, which is not the case, and the adopted Standards do not require any additional parent parking and there is an effective In/Out system with a substantial internal space to facilitate adequate drop-off/collection, a feature that many schools do not possess.
- 5.17 The additional Highways response is that as the school is an existing facility that is already a significant traffic generator, its effects are mostly only felt at drop-off and pick up times, and the additional vehicle movements generated would not have a noticeable material impact in highway safety terms, especially as some of the vehicular trips would be linked with those of siblings.
- 5.18 In conclusion, the Highways section states that the photographic evidence provided by local residents does not demonstrate a severe detrimental highway impact that 'could be proven to be exacerbated or created by the proposals.'
- 5.19 The proposed portacabin is proposed to be sited at the end of the rear gardens of Nos. 4 and 5 The Leys. Mature trees grow along the boundary between these residential properties and the existing school site and these would not be significantly impacted by the proposed development. As such, the residential properties within The Leys currently back onto a school and experience some noise from school activities. To an extent the proposed siting of the portacabin might even screen some potentially noisy activities that could take place on this part of the school site, although some activity within the portacabin and when the proposed nursery children are playing outside, might be heard within the curtilage of the adjacent properties in The Leys. However, given the existing planning status of this application site it would not be possible to demonstrate a material loss of amenity by virtue of the use of the proposed portacabin nursery and the ancillary use of the adjacent land by the nursery children.
- 5.20 As set out above, the Highway Authority has raised no objection to this proposal on highway safety grounds, and this is discussed in more detail in the section below.

However, the amenity issues of additional traffic and on-street parking are separate to those relating to highway safety. There are clearly existing congestion problems on the streets around the site and near to the Beacon School that cause a loss of residential amenity to local residents, through on-street parking and vehicles looking for a drop-off point. The proposed increase in the number of pupils and staff, by way of the creation of an additional nursery classroom, is likely to exacerbate the existing congestion in the locality. The additional vehicle movements, with parents looking for a space to park, and the increased demand for on-street parking, would cause more harm to the amenities of residents in the local area, through a greater level of disturbance and inconvenience. As such Officers consider that it has not been satisfactorily demonstrated that the development would not worsen the residential amenities of local residents.

Transport matters and parking

Core Strategy Policies:

CS25 (Dealing with the impact of new development on the transport network)

CS26 (Requirements of new development)

Local Plan Saved Policies:

TR2 (Highway aspects of planning applications)

TR3 (Access and road layout)

TR11 (Provision of off-street parking for developments)

TR12 (Relaxation of parking standards)

TR14 (Retention of existing areas of off-street vehicle parking)

TR15 (Design of parking areas)

Buckinghamshire Countywide Parking Standards

- 5.21 As stated above, objections have been received from many local residents on traffic and amenity grounds, specifically pertaining to the proposed development exacerbating existing traffic congestion due to increased vehicular movements on the surrounding roads, and insufficient on-site parking to cater for staff parking and/or to cater for any parent's vehicles resulting in a demand for additional on-street parking.
- 5.22 This application has been accompanied by a Transport Assessment (TA) commissioned by the Beacon School and, as summarised from the submitted objections, it is considered by local residents that the TA is not an objective assessment. Many photographs have been submitted by local residents showing congestion at the access to the school and on surrounding roads.
- 5.23 As set out above, the Council's Highways Officer has raised no objection in principle to the proposed development on highways grounds, advising that there are sufficient on-site parking spaces to cater for the resultant number of Full Time Equivalent (FTE) members of staff. Although it is recognised that some of the existing parking spaces do not fully comply with the Council's stipulated dimensions, it is considered that given that they are provided for staff, they are workable.
- 5.24 However, local residents have raised objections pertaining to the conclusions of the TA that the surrounding roads currently provide sufficient opportunity for on-street parking for parents and would provide sufficient opportunity for future need in the event of this planning application being approved. As already stated, the Buckinghamshire Countywide Parking Standards 2015 require 1 on-site parking space per FTE member of staff, but also state that 'All schools and colleges should provide

appropriate drop off areas as well as car parking. Drop offs can reduce the need for parking, improve circulation and ultimately reduce congestions problems on local roads around the school.'

- 5.25 The Beacon School provides no on-site parking for anyone other than staff and the Highways section considers the existing and proposed drop off arrangement to be fit for purposes.
- 5.26 Local residents have stated that catering staff and other ancillary staff are not included in the FTE staffing figures and, therefore, presumably comprise some of the existing vehicular generation and on-street parking in the locality, however, it is unlikely that the numbers of those staff would be materially different in the event of planning permission being forthcoming for this current application.
- 5.27 Given the conclusions of the Highways section following a detailed assessment of the application submissions, no objection may be substantiated on highway safety grounds.

Other Issues

- 5.28 Objections have also referred to resultant increased levels of pollution from increased vehicular activity and although that might arise, it would be difficult to demonstrate that the increase in vehicles generated by those children coming from a distance would impact on pollution levels sufficient to justify a reason for refusal, as any children from within Buckinghamshire might be utilising cars in order to access other nurseries in any event.
- 5.29 Local residents have also expressed concern that in the event of temporary planning permission being forthcoming for 3 years, a permanent planning permission would inevitably follow at the end of that time, although no details have as yet been submitted regarding the location of any permanent nursery. The proposed portacabin and ramps are such that a temporary condition could be imposed in accordance with the advice of the NPPG pertaining to the tests for the imposition of planning conditions. However, it is pertinent that in the absence of a material change in circumstance it is unlikely that a different planning decision would be justified if a further limited period application were submitted, and a different planning decision at the end of the 3 year period would inevitably impact on the next intake of potential nursery children.
- 5.30 Objections have also been received at the timescale given by the Council for adjoining occupiers to submit objections and concerns and to carry out their own assessments. However, any comments received prior to the determination of an application are taken into account and, as such, local residents have had over 3 months to submit comments on the Transport Assessment.
- 5.31 The Council's Ecologist has raised no objection in principle subject to the imposition of a condition requiring the installation of a bird and bat box and an informative stipulating the need to protect local wild birds and wildlife.

6.0 Weighing and balancing of issues / Overall Assessment

- 6.1 In determining the planning application, section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. In addition, Section 143 of the Localism Act amends Section 70 of the Town and Country Planning

Act relating to the determination of planning applications and states that in dealing with planning applications, the authority shall have regard to:

- a. Provision of the development plan insofar as they are material,
 - b. Any local finance considerations, so far as they are material to the application (such as CIL if applicable), and,
 - c. Any other material considerations
- 6.2 As set out above it is considered that although the proposed development would provide additional community facilities, it would be likely to cause additional congestion and loss of residential amenity for those residential occupiers of this locality. It is considered that this harm outweighs the benefits in this case.
- 6.3 Local Planning Authorities, when making decisions of a strategic nature, must have due regard, through the Equalities Act, to reducing the inequalities which may result from socio-economic disadvantage. In this instance, it is not considered that this proposal would disadvantage any sector of society to a harmful extent.

7.0 Working with the applicant / agent

- 7.1 In accordance with Chapter 4 of the NPPF (2021) the Council approaches decision-taking in a positive and creative way taking a proactive approach to development proposals focused on solutions and work proactively with applicants to secure developments.
- 7.2 The Council works with applicants/agents in a positive and proactive manner by offering a pre-application advice service, and as appropriate updating applications / agents of any issues that may arise in the processing of their application.
- 7.3 In this instance:
- the applicant/agent were updated of any issues after the initial site visit,
 - Buckinghamshire Council has sought additional information during the consideration of the application and the opportunity was given to seek to address concerns raised and additional information was submitted, which overcame some of the concerns raised.
 - The application is now to be considered by the Planning Committee where the applicant/agent has the opportunity to speak to the committee and promote the application.
- 7.4 The following recommendation is made having regard to the above and also to the content of the Human Rights Act 1998.

8.0 Recommendation: Refuse permission

For the following reasons:-

1. There are existing congestion problems on the streets around the site and near to the Beacon School that cause a loss of residential amenity. The proposed increase in the number of pupils and staff, by way of the creation of an additional nursery classroom, is likely to exacerbate the existing congestion in the locality. The additional vehicle movements, with parents looking for a space to park, and the increased demand for on-street parking, would cause more harm to the amenities of residents in the local area, through a greater level of disturbance and inconvenience. As such the proposal is contrary to Policies GC3 and CSF1 of the Chiltern Local Plan, adopted 1 September 1997 (including alterations adopted 29 May

2011), consolidated September 2007 and November 2011 and Section 11 of the National Planning Policy Framework (2021).

APPENDIX A: Consultation Responses and Representations

Parish Council Comments

Objection

'Chesham Bois Parish Council - Objection: Given the site is already very substantially developed and has caused significant traffic congestion, there will be a further increase in traffic, and it should be clearer how the increase will be managed. The applicant should be preparing an application concurrently to show how the permanent buildings will accommodate these greater numbers to avoid the risk of a second application for temporary use being made in 3 years' time.'

Amended plans consultation:

'CBPC Decision: Objection – The impact of increased traffic should be fully considered. Applicant should in fact be making an application for permanent building. The three-year period of use should be enforced.'

Consultation Responses

Highway Authority:

No objection subject to 2 conditions and s106 agreement for the payment of a £3,000 developer contribution towards travel plan monitoring.

'Amersham Road is classified as the A416 and in this location is subject to a speed restriction of 40mph. Proposals include the erection of a temporary building to be used as a day nursery for a period of three years.

When considering trip generation, having interrogated the TRICS® (Trip Rate Information Computer System) database, I find that a 20-place nursery would have the potential to generate 68 vehicular movements (two-way) per day. I would expect a proportion of these to be linked trips, as part of existing movements on the Local Highway Network. As the site would be subject to an intensification in use, the access arrangements serving the site will need to be assessed in order to determine their suitability to accommodate the level of vehicular movements anticipated.

When considering the increased traffic as a result of the proposals, I note that the school currently has an existing nursery on site, alongside a Reception age group, plus Years 1 through to 8. The majority of these age groups are staggered in terms of timing of registration and the end of the school day. Years 1 – 8 would start school earlier (8:20 and 8:30am) and would depart the site later (15:15 – 16:45pm). The Nursery and Reception age group would start at 9am and leave the site at 3pm. These are outside of the main network peaks and would act as an extension to the existing peaks currently experienced at the school. Having both visited the site and viewed CCTV footage of the site at various points of the day during both pick-up and drop-off times, the operation of the access conforms to that of a normal priority junction, and therefore I do not consider that the additional traffic generated by an extra 20 nursery places would lead to an unacceptable impact on highway safety, nor would the residual cumulative impact of the development be severe, in line with the NPPF (National Planning Policy Guidance).

The Beacon School car park is currently laid out under a one-way system, with the northern access point being used as the 'out' access point. As Amersham Road is subject to a speed restriction of

40mph, visibility splays of 2.4m x 79m are applicable, commensurate with current Manual for Streets guidance. I can confirm that these visibility splays are achievable from the existing 'out' access.

In terms of parking provision, I note that Buckinghamshire's Countywide Parking Guidance document states that 1 space is required per FTE (full time equivalent) staff member. It is my understanding that 103 employees are currently employed, with 4 staff being proposed to be employed to run the nursery. When considering parking provision in relation to the standards, I can confirm that there is adequate capacity within the site to allow for sufficient staff parking.

However, within the guidance, there are no standards in relation to parent parking/student drop offs. The school currently benefits from a drop-off area on site, which is not marked out on the ground. In order to ensure that the drop-off area remains well-used and is efficient, a requirement should be placed on the school through its Travel Planning to monitor and manage the use of the drop-off area. As the proposals are for a nursery and would comprise of very young students, parents would make use of this facility when dropping off/picking up and would be unlikely to park on the highway in the vicinity of the site, as parents will escort their children to the nursery.

The site is within a reasonable walking distance of residential areas and so it can be expected that some of the children would be brought to the school on foot. It is my understanding that the school presently does not have an active travel plan uploaded to the Modeshift STARS system, and as such I will attach a condition so that this can be the case.

I acknowledge that concerns have been raised in response to this application regarding increases of traffic in the vicinity of the site. From the objections, it is apparent that the existing parking pressures are caused by inappropriate behaviour from parents of this school and a neighbouring school. I have raised this with the Buckinghamshire Council Parking team. In terms of this permission, given the specific use of the site as a nursery which already exists on the site, the staggered timings in which students will arrive and depart, the existing drop-off facilities on site, I do not consider that the Highway Authority could reasonably defend a reason for refusal at appeal, given the above.

Mindful of the above, I have no objection to the proposals, subject to the following condition and 106 obligations being included on any planning consent that you may grant....'

Additional Comments:

'I've gone back through the application and would point out the following –

On-street parking availability and dimensions would only be an issue if displacement were to occur that, according to the existing (and continuing) level of parking within the site, the Highway Authority is not expecting to occur should the proposals be permitted and subsequently implemented. I note that the parking surveys submitted as part of the application and contained within the Transport Statement do indicate that the on-street spaces are 5m, however they *also* show that there is adequate space in the vicinity of the site for additional on-street parking to occur utilising a satisfactory 6m linear dimension. However, It is our professional opinion that no additional parking is required, so displacement onto local roads should be no worse than the current situation. In addition, and as you have referenced, there is an effective In/Out system with a substantial internal space to facilitate adequate drop-off/collection (a feature that many schools do not possess).

Given that the school is an existing facility with c.530 pupils and spaces for 20 children at the current nursery, the site is already a significant traffic generator, whereupon (like all educational sites) its effects are most felt during the AM and PM periods. In consideration that the proposals seek only 20(no) additional pupils, the additional vehicle movements generated by the proposals are not considered to make a noticeable material impact to the activities already (and historically) experienced.

It should also be noted that some of the additional nursery spaces created by the proposals could be for children whose siblings attend the school. As a result, they will be a certain level of linked trips, meaning that some trips to the school are already taking place on the network.

It is also commonplace for nurseries to have flexible drop-off/collection times, which could also mean that journeys associated with the additional spaces sought may not take place parallel with journeys to deliver or collect children from the school. Even if these movements occur at the same time as teachers, this would still be dwarfed by the amount of vehicle movements generated by parents/guardians visiting the school to drop-off or collect their children, and consequently this is not a matter of concern in highway terms.

I have yet to review any photographic evidence provided by representations to the application that would demonstrate a severe detrimental highway impact that could be proven to be exacerbated or created by the proposals. The A416 is a busy A-class district distributor road that, like many roads, is busy during peak periods. However, the existing access/egress facilities, internal parking and drop-off/collection area should be more than sufficient to also serve the nursery expansion of 20 places. Consequently the Highway Authority can see no grounds on which to lodge nor sustain an objection to these proposals based upon regular peak hour traffic activities.

The Transport Statement submitted in support of the proposals does not identify any extant highway safety or capacity issues. When the impact of the additional 20(no) spaces are taken into account, the existing activities concerned with vehicular movements associated with the operation of the school and nursery will not be negatively impacted by the proposals addition of nursery places that equate to around only 4% of the existing school roll number and 20(no) nursery places.'

Sustainable Drainage Officer:

No comments to make given the scale of the proposed development.

Building Control Officer:

No objection; 'All work to comply with Approved Document B'.

Heritage Officer:

No objection.

Ecology Officer:

No objection subject to the imposition of condition requiring 1 bat box and 1 bird box to be installed.

Waste Officer:

No comments to make because not a residential development.

Representations

Letters of objection from the occupiers of 36 adjoining properties on the following grounds:

- Traffic congestion already exists due to the School and will be exacerbated;
- No mention is given to tailbacks into the school in the application Transport Assessment (TA) and casts doubt on the integrity of other aspects of the TA which was commissioned by the School and is not objective;
- Tailbacks do not occur when the school is closed;
- The TA was undertaken on 1 and 8 June that did not represent 'normal' traffic flows outside of school term times because it was the Platinum Jubilee when the locality was unusually busy;
- The TA is based on an average of 1.22 pupils per parent because most responses were from Year 4 parents, but this implies that a greater number of pupils will come to the school sharing a car with a parent, whereas others years are likely to have more pupils travelling in unshared cars;
- Parents who have children in the nursery and main school will park on adjoining roads and wait to drop off and pick up both children;
- An additional 24 vehicle trips is an under-estimation;
- On-site parking is only for staff, it does not pertain to parents dropping off children;
- Pavement parking during school commencement and finishing hours;
- The TA submits 'idealised' parking options e.g. on the north or south side of Chiltern Road but cars park in a more problematic and ad hoc manner, also in proximity to road junctions and bends contrary to the Highway Code;
- Some of the parallel parking spaces are only 5m long rather than the requisite 6m;
- Incremental expansion of the school resulting in an incremental increased impact;
- One year's class intake is 20 pupils and a requirement for up to 4 additional staff and so 3 years would be likely to result in 60 pupils and up to 12 additional staff;
- 750 pupils in a private school and many not residing within the geographic catchment area;
- Catering staff and other ancillary staff are not included in the FTE staffing figures and would add to likely traffic generation;
- Likely increase in pupils to finance the proposed enhancements;
- At end of 3 years an application will be submitted for a permanent building as there is apparently insufficient space within the existing school buildings;
- The School has outgrown its site within this residential area;
- Increased levels of pollution from increased vehicular activity;
- Local residents' objections and concerns are unsympathetically dismissed;
- Short time scale given by the Council for adjoining occupiers to submit objections and concerns and to carry out assessments.