

REPORT FOR STRATEGIC PLANNING COMMITTEE

Date of Meeting	6 October 2021
Application Number	PL/2021/06782
Site Address	Silverwood School, Rowde, Devizes, Wiltshire. SN10 2QQ
Proposal	Proposed development of Silverwood School, extending the existing Rowde Campus (formerly Rowdeford School) to provide a high quality SEND school campus for 350 students including the construction of a new two storey education building with new Hydrotherapy Pool, teaching classrooms and Main Hall, the development of existing buildings, new all-weather sports pitch, new playing fields, on-site parking, landscaping, ecological enhancements and associated works
Applicant	Wiltshire Council
Town/Parish Council	Rowde Parish Council
Electoral Division	Bromham, Rowde & Roundway ED (Cllr Laura Mayes)
Grid Ref	399710 163340
Type of application	Wiltshire Council R3
Case Officer	Andrew Guest

Reason for the application being considered by Committee

Under the Council's Scheme of Delegation Specific to Planning, planning applications made by Wiltshire Council which generate any objections raising material planning considerations are required to be determined by a planning committee, in the interests of transparency of decision making. As this application is for a large-scale major development which has wider strategic implications and raises issues of more than local importance, the relevant planning committee is the Strategic Planning Committee.

1. Purpose of Report

The purpose of the report is to assess the merits of the proposal against the policies of the development plan and other material considerations and to consider the recommendation that the application be approved.

2. Report Summary

This is a full planning application to develop the existing school to provide a high-quality SEND (Special Educational Needs and Disability) permanent school campus for 350 students including the construction of a new two storey education building (containing new hydrotherapy pool, teaching classrooms and main hall), the re-purposing of existing buildings, new all-weather sports pitch, new playing fields, on-site parking, landscaping, ecological enhancements and associated works.

The principle of the proposal is supported by Rowde Parish Council although with some concerns relating to traffic management. At the time of writing, the application has generated two representations from interested parties – one objection and one comment.

The application is recommended for approval subject to conditions.

There is a separate associated application for Listed Building Consent.

3. Site Description

Silverwood School (formerly Rowdeford School) lies within c. 13.4 ha of open countryside, just to the north of the 'Large village' of Rowde, nr Devizes.



It is a county co-educational special school for students with complex learning needs, with c. 180 such students currently on the role (with at least some of these accommodated in temporary mobile classrooms).

It comprises a range of buildings positioned towards the centre of the site, including Rowdeford House (a former largely Georgian country house, now Listed Grade II) and other older buildings formerly ancillary to the House (including the coach house containing the Bowden Hall Arts Centre); and other more contemporary, purpose-built educational buildings, including the Orchard Block, the Buzzard Block and 3 to 4 temporary mobile classrooms. There are also further ancillary educational facilities including the Dining Shed, school farm outbuildings and the walled garden, a biomass boiler and gas tanks.

Surrounding the buildings and walled gardens to their north, west and south sides is parkland (associated with the original house) and/or woodland. To the east/north-east side are open fields. The 'Head Teacher's House' stands in the northern corner of the site, away from the other buildings, but alongside Rowdeford Lodge (the former lodge to Rowdeford House, but now in separate ownership), also grade II Listed.

Access to the school is from the south from the A342 (Chippenham-Devizes road) via the original south drive to Rowdeford House. This passes through a set of stone gate posts and gates (also grade II Listed). There is a second northern access (beside Rowdeford Lodge), also passing through a set of stone gate posts (again, grade II Listed); this access, although historic and lawful, is not used as a matter of routine to enter the school. The south drive provides access to all of the buildings and related areas for car parking and servicing.

2.05 EXISTING SITE : SITE FEATURES

The Site at Silverwood School Rowde Campus contains a number and variety of features and retains an immense wealth of heritage and ecological value.

The main built form features of the site are:

1. Rowdeford House Grade II Listed
2. Orchard Block
3. Bowden Hall
4. Timber Dining Shed
5. Buzzard Block
6. Biomass Boiler
7. Gas Tanks
8. Temporary Teaching Classrooms
9. Walled Garden Greenhouse
10. Walled Garden / School Farm Outhouses / Sheds
11. Environment Centre Forest School
12. Yurt



Existing Silverwood School built form features

2.05 EXISTING SITE : SITE FEATURES

The Site at Silverwood School Rowde Campus contains a number and variety of features and retains an immense wealth of heritage and ecological value.

The main site features of the site are:

1. Main Entrance Gates
2. Access Road
3. Front Heritage Parkland Setting, inc. trim trial & zip line (used and accessed by Silverwood School)
4. Apple Orchard
5. Walled Garden
6. Woodland (used and accessed by Silverwood School)
7. School Farm and Forest School
8. School Playground
9. Lower Parkland / Pasture Field
10. Upper Parkland / Pasture Field
11. Head Teachers House
12. Woodland (not generally accessed by Silverwood School)



Existing Silverwood School site features

Existing site arrangement

For planning purposes the entire site lies within 'open countryside'. A watercourse to the south of the site places land nearby to it in Flood Zones 2 and/or 3, and parts of the site are at risk of groundwater flooding due to the high-water table. The site is not in an area covered by any special landscape designation. A public right of way (ROWD6) runs alongside the eastern boundary of the site. A bat maternity roost known to be present at the site has links to the Bath and Bradford-on-Avon Special Area of Conservation (SAC).

4. Relevant history

In November 2019, the Wiltshire Council Cabinet agreed to "establish a new, maintained special school with a single leadership team to work across all three sites of St Nicholas,

Rowdeford [Silverwood School] and Larkrise schools ... the three schools would close as separate schools, but open as one school". This agreement has led to this planning application to expand the existing Silverwood School to provide up to 350 places.

Over the years various planning permissions have been given for school related developments at the site leading to its present arrangement.

5. Proposal

The proposal is to develop the existing school to provide a high-quality SEND (Special Educational Needs and Disability), all permanent (no temporary classrooms) school campus for 350 students including the construction of a new two storey education building (containing new hydrotherapy pool, teaching classrooms and main hall), the re-purposing of existing buildings, new all-weather sports pitch, new playing fields, on-site parking, landscaping, ecological enhancements and associated works.

The proposal accords with Wiltshire Council's brief for the development, which was/is as follows –

- *The school will provide 350 places and designed with scope to expand subject to future need.*
- *For pupils, aged 4-16 with special educational needs with a focus on access for non-ambulant pupils.*
- *For Profound and Multiple Learning Disabilities (PMLD), Severe Learning Difficulties (SLD), global delay, Moderate Learning Difficulties (MLD) with associated medical needs and syndromes.*
- *The existing Rowdeford facilities will be used, so an additional 200 places of new build are required.*
- *The new build would provide separate zones for 4-11 and 11–16-year-olds and include a post 16 unit that will accommodate 15 pupils.*
- *Landscaping sympathetic to the site will be required.*
- *Access for vehicles is important.*
- *Facilities for storage, hydrotherapy and other therapies needed.*
- *The temporary accommodation at Rowdeford Special School also needs to be replaced with permanent buildings.*
- *To be consistent with DfE Building Bulletin Guidance 102 104.*

Further requirements:

- *To use the "good space" at the existing school to maximum effect i.e., to consider making use of some of the existing buildings.*
- *To consider a phased approach such that Key Stage 1 accommodation might be completed in advance of Key Stage 2 accommodation as the Council ordinarily would not like new KS1 pupils spending a year in one school before having to move to the new school.*
- *To make best use of the surrounding landscape.*
- *To ensure good circulation routes for all vehicles on the basis that 99% of pupils are likely to come to school by car or bus.*
- *To create a public frontage to the new school that might include a café function or access to gardens for members of the public and local community.*

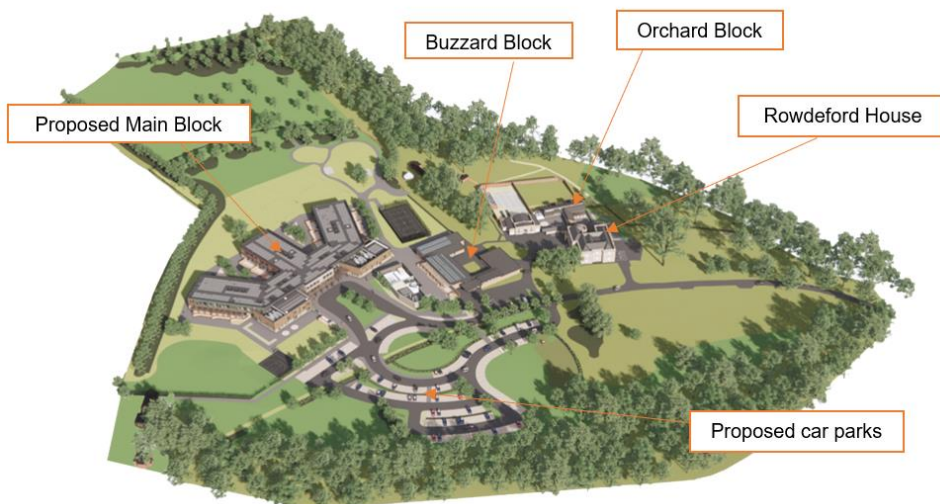
The main new build elements of the proposal comprise the two-storey classrooms and hall building (the 'Main Block', to be sited to the north of the existing Buzzard Block), soft and hard playing pitches/courts (to be sited around the Main Block, including in place of the existing

temporary mobile classrooms), and the car parks (to be sited to the east and west sides of the existing drive, in front of the new classrooms and hall building and existing Buzzard Block); and an enlarged energy centre.

All of these new build elements would be soft and hard-landscaped, to create appropriate settings and open educational/amenity spaces for the school, and to provide strategic planting in the interests of wider visual amenity and ecology.



Master Plan



The proposed main block – containing classrooms, the hall, the hydrotherapy pool and related administrative functions – would have a contemporary design/appearance. The three main external materials would be textured buff brick, western cedar cladding and render.



Main Block – Ground Floor layout



Main Block – artist's impressions of elevations

The main existing build elements of the proposal comprise the refurbishment/alteration and re-purposing of Rowdeford House, the Orchard Block and the Buzzard Block. Rowdeford House would provide mainly classrooms and an enterprise space (to allow greater community interaction) on the ground floor, with school office space on the first and second floors. Some alterations to the fabric of the building would be necessary, including improved access

arrangements; these also subject to a standalone Listed Building Consent application. The Orchard Block would receive a number of minor alterations to allow its re-purposing solely for pre-school use. The Buzzard Block – which has in recent years been altered to suit pupils with complex needs, including the creation of outdoor canopied learning spaces directly accessed from two classrooms – would be further altered to allow similar arrangements for its three other classrooms. No alterations are proposed to the Head Teacher’s House, which would remain in ancillary use.



***Artist's impression – Rowdeford House
(existing Orchard Block to right side)***

The proposed car parks (and related access roads / turning circles) would be located in front of the Main Block and partly within the parkland and pasture areas. They would provide 209 new car parking spaces (plus 2 mini-bus spaces), 30 of which would be overflow spaces only. 30 further spaces would be retained at the existing car parks in front of Rowdeford House and the Buzzard Block.

The current main southern access to the site would continue to provide the access for all school related traffic. Its existing width would be increased from 3.6 - 4.7m to 5.2m to enable safer two-way traffic movements.

During construction, construction traffic is proposed to use the northern access route which would have construction sign-posting and temporary traffic management measures to ensure safe access and egress. To facilitate the temporary use of the northern access for construction traffic, part of the stone gate posts and attached wall would be temporarily dismantled and then rebuilt on completion of all other works.

Improved security at the site would be achieved through the creation of a 'secure zone' in the areas where students would be based. The secure zone would be implemented through the use of fencing along the northern boundary, and further fencing to secure Orchard Block and Rowdeford House. A CCTV strategy has also been devised in collaboration with the school.

Existing operation of the school allows community use of its facilities when these are not required by the school, notably out of school hours. This is proposed to continue with the

added use of the new facilities which are now proposed. The community use would include the following –

- Continued use of parts of the school grounds for outdoor activities/training
- Continued use of the sports hall in Buzzard Block
- Continued use of the Wooden Hall
- Continued use of the Arts Centre for meetings/events
- Use of the proposed multi-purpose hall in the new classroom block for sports or other events including associated spaces.
- Use of the proposed hydrotherapy pool in the new classroom block

The entire development would be delivered in a phased manner to allow continued operation of the school during the construction. The construction programme is planned to run from February 2022 to December 2023.

The application is accompanied by various supporting reports including a Design and Access Statement, an Ecological Impact Assessment & related technical notes, a Landscape and Visual Impact Assessment, a Heritage Assessment, a Traffic Impact Assessment & Travel Plan, a Noise Impact Assessment, an Arboricultural Impact Assessment & Tree Removal Technical Note, a Ground Impact Assessment (relating to potential contamination), Soft Landscape Strategy, a Flood Risk Assessment & Foul and Surface Water Drainage Strategies, a Statement for Lighting, a Community Use Report a draft Construction and Environment Management Plan, and a Statement of Community Involvement.

The proposed development is not 'EIA' (Environmental Impact Assessment) development under the terms of the Town and Country Planning (Environmental Impact Assessment) Regulations.

6. Planning Policy

Wiltshire Core Strategy - CP1, CP2, CP50, CP51, CP56, CP57, CP58, CP60, CP62, CP64, CP67

NPPF / PPG

7. Consultations

Rowde Parish Council: Comments

The Parish Council supports the building aspect of the development.

There are concerns about the traffic management to and from the location. The Parish Council acknowledges that there are plans to submit a Traffic Regulation Order (TRO) to reduce speed on that stretch of the road. There is a request for construction traffic not to access the site at the start and finish of the school day.

(The Parish Council requested sight and input into the Traffic Management Plan (TMP). These documents have been supplied 15/7/21 and are being considered by the Parish Council).

Wiltshire County Archaeologist: no objection

The applicant commissioned an archaeological trial trench of the site prior the submission of this application. This evaluation was carried out in February this year with a report on the results produced in March. This report was reviewed and approved by Wiltshire Council

Archaeology Service (WCAS). A copy of this report has not been included among the supporting documentation on the planning portal, instead a copy of an earlier desk-based assessment has been included, the results of which have been superseded by the trial trenching. The evaluation found a few traces of post-medieval ridge and furrow agriculture along with some fragments of modern activity. This archaeological activity can be classified as negligible and will not be a material consideration in determining this application. I would therefore not wish to raise any archaeological issues in this instance.

Wiltshire Council Conservation: no objection, subject to conditions

Policy: From the point of view of the historic environment the main statutory tests are set out within the Planning (Listed Building and Conservation Areas) Act 1990. Sections 16 (LBC) and 66 (PP) require that special regard be given to the desirability of preserving listed buildings, their settings or any features of special architectural or historic interest which they possess.

The NPPF outlines government policy for planning. It sets out three overarching objectives for the planning system in the interests of achieving sustainable development – an economic objective of building a strong economy; a social objective of fostering well-designed, beautiful and safe places and an environmental objective of protecting and enhancing our natural, built and historic environment. Chapter 16 of the NPPF 'Conserving and enhancing the historic environment' sets out policies concerning heritage and sustainable development and requires a balanced approach.

National Planning Practice Guidance provides guidance on interpreting the NPPF.

The Council's Core Strategy Policy CP58 'Ensuring the conservation of the historic environment' requires that "designated heritage assets and their settings will be conserved, and where appropriate enhanced, in a manner appropriate to their significance."

The Council's Core Strategy CP 57: Ensuring high quality design requires a high quality of design in all new developments.

Historic England Advice Note 2 – Making changes to Heritage Assets illustrates the application of policies set out in the NPPF in determining applications for PP and LBC.

Site: Rowdeford House is a grade II listed country house built 1812, currently used as a school. The house is surrounded by landscaped grounds and a designed park. To the north is a stable block and to the east are walled gardens with restored glasshouses. A belt of woodland along the road ensures the privacy of the estate. To the north east in woodland the remains of a curtilage listed kennel range has been converted to a further teaching facility.

Proposal: the current applications are for the expansion of the school to create a regional hub for specialist school provision.

Issues: impact on the grade II listed Rowdeford House and its setting and associated buildings and structures, including the separately listed entrance gates and lodge to the north.

Assessment: paragraph 194 of the NPPF requires that applicants describe the significance of any heritage assets affected, including any contribution made by their setting. The proposals are accompanied by a Heritage Assessment which examines the significance of the heritage assets involved and the contribution made by their settings. It also includes a buildings assessment/record of the main house and an assessment of the impact of the proposed scheme. I am generally in agreement with the submitted document which provides a thorough background assessment/recording of the site.

The NPPF defines significance as the “value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.” Historic England assesses significance in a similar manner, referring to evidential, historic, aesthetic and communal values of a place. Despite being requisitioned during the war and in educational use since, the house retains a surprising level of historic significance. The original plan form of the building remains legible and the building is rare amongst those converted to such uses in retaining many original features and much of its internal decorative scheme. Similarly, the surrounding designed landscape remains in good and legible condition close to the house within the school boundary although the wider parkland to the north has become degraded via separation from the estate and return to general agricultural use. It is agreed that the significance of the building lies not only with its historic fabric and architecture – which have significant aesthetic value – but also with its history as an excellent example of a small country estate which was associated with some notable figures. It is also agreed that the current use of the building as a school over a long period has evolved as another significant phase within its history which has attracted a considerable communal value.

Paragraph 192 of the NPPF encourages authorities to “take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation”. In the majority of cases it is acknowledged that continuation in a similar use will usually offer the best chances of sustaining the asset whilst limiting any harm which might result. Rowdeford House has been in educational use for many years (indeed this has become an important chapter in itself in the building and estate’s history) and is being maintained and cared for and it is in the immediate interests of the protected building that this situation continues. In return, the site at Rowdeford House offers the project huge potential benefits and opportunities in terms of potential to build upon the success of an established existing facility set within an existing valued historic built and landscape framework which contributes to its success.

Paragraph 195 of the NPPF requires that local planning authorities should seek to “to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal. In the initial planning scoping for the project consideration was given to a considerable number of sites and options for meeting the required need for the special educational provision in order to select the least harmful (across all constraints including those relating to the historic environment) option available. Since selection of the site, the scheme has been developed in conjunction with stakeholders over a long period of consultation and proposals have been revised to address concerns raised. The proposals are appropriately set out and discussed within the submitted documents with key interventions impact on historic environment issues including:

- Construction of new school and car parks to the north of the historic house within the historic estate and designed setting of the house;*
- Widening of the main access drive and provision of security fencing;*
- Provision of ramped access to orangery and minor alterations and interventions in and around the main buildings to enhance access and circulation and to facilitate slightly changed uses;*
- Temporary removal of gate pier and wall at north gates to allow for construction traffic to the site.*

Summary & conclusion: The impact assessment and Planning Statement acknowledge and appropriately assess the potential harm to the values of the site and I am in agreement that these should be considered as causing ‘less than substantial harm’ for the purposes of interpreting the NPPF, at the lower end of the scale. However, the project has also evolved to limit the harm that will be caused and to mitigate the impact where it cannot be avoided – for

example via limiting or avoiding new lighting altogether in the most sensitive areas and via enhancing the legibility of the former drive to the north gate.

Paragraph 202 of the NPPF allows that a level of harm may be offset by public benefits, which could include conservation benefits. Whilst the proposals will result in some harm to the building via alterations to historic fabric and via change within its setting there will also be some offsetting conservation benefit in sustaining the optimum viable use of the site for the future.

The final planning balance falls to be assessed by the Case Officer / [Planning Committee], however it is understood that the proposed development will be considered to have the potential to bring forward substantial public benefits in terms of the meeting an unmet requirement for education provision in Wiltshire. On this basis, it is expected that the modest level of residual harm to the listed building will be considered to be outweighed by the conservation and wider benefits of the proposals. As a result, I have no objection to a positive recommendation for the proposed application on the basis of the built historic environment but suggest the addition of conditions.

Wiltshire Council Drainage: no objection

Following a review of the following documentation –

- Desk Study and Ground Investigations Report Part 1 -4
- Flood Risk Assessment and Hydraulic Modelling Report
- Foul and Surface Water Drainage Strategy Report - Part 2-1
- Foul and Surface Water Drainage Strategy Report - Part 3
- Foul and Surface Water Drainage Strategy Report - Part 4

we can support this application based on the following conditions being fulfilled:

- Ensure that the correct factor of safety in the soakaway design is applied. The factor of safety varies depending on the size of the area to be drained and the consequences of failure. See table 25.2 in The SuDS Manual.
- The MADD factor should be set to zero in the Micro Drainage calculations

Wiltshire Council Ecology no objection, subject to conditions

I have reviewed the relevant supporting information against OS maps and aerial photographs of the site and surrounding area, along with GIS layers of statutory and non-statutory designated sites for nature conservation and existing records of protected habitats and species.

I provided pre-application advice to the project team and their consultant ecologists, Johns Associates, from an early stage, including discussion and agreement of the level and scoping of ecological surveys required to inform the planning decision. I have discussed with the project team the existing, known ecological constraints affecting the site, in particular the existence of the lesser horseshoe summer maternity roost within the boundary of the existing school site, the status of adjacent woodlands and their function not only for Annex II bats but for other wildlife species such as barn owls (for which there is a known roost within the adjacent woodland), and the status and relevance of anecdotal evidence relating to bats in the wider local area. I have also discussed the design and formation of appropriate and sufficient mitigation measures at key stages of the project, to ensure that the resulting project design will not result in any residual significant adverse effects on protected habitats and species and

will provide measurable enhancement of habitats for the benefit of biodiversity, for the lifetime of the development and beyond.

Statutory Designated Sites for Nature Conservation -

The application site does not lie within or adjacent to any statutory designated sites for nature conservation, however it does lie within a core sustenance zone for Lesser Horseshoe bats that are associated with the Bath and Bradford on Avon Bats Special Area for Conservation (SAC). Any plans or projects within this zone, that have the potential to negatively impact the Conservation Objectives of the SAC, must undergo Appropriate Assessment under the Habitats Regulations to ensure that all negative impacts resulting from the proposal are sufficiently mitigated so as to be removed or reduced as far as possible. As the relevant Competent Authority, Wiltshire Council is responsible for conducting the Appropriate Assessment and therefore requires that a sufficient level of information is submitted in support of the application to enable that assessment.

Johns Associates have provided a shadow Appropriate Assessment containing sufficient information to be able to reach the conclusion that no likely significant effect on the Conservation Objectives of the Bath & Bradford on Avon Bats SAC will result from this proposal if permitted. I have sent the Appropriate Assessment to Natural England seeking their agreement on this conclusion. Natural England require a minimum of 21 days consultation, therefore permission should not be finally granted until confirmation of agreement has been received.

Non-Statutory Designated Sites for Nature Conservation –

There are areas of woodland within the wider school site and in the immediate locality that carry the non-statutory designation of Local Wildlife Site (LWS) because they are habitats of principal importance for the conservation of biodiversity (NERC Act 2006), also known as UK Biodiversity Action Plan Priority Habitats. However, none of these will be directly or indirectly affected by the proposed scheme. The two areas within the wider existing school site are on the western and eastern boundaries of the wider site. No works will directly affect these wooded areas and no indirect impacts are expected. There are no other LWSs for other habitats within or adjacent to the application site.

Potential Impacts on Protected Species –

The site has been subject to extensive ecological survey in 2019, 2020 and 2021. I am satisfied that the scope of survey agreed with the ecologists and the project team has been carried out at a sufficiently detailed level, following the accepted industry guidelines for timing of surveys, survey effort and interpretation of data. The results have been used to inform design of mitigation, compensation and provision of effective biodiversity net gain within the site, such that important wildlife species will be buffered from the effects of the proposed development and will benefit also from additional habitat creation.

Key protected species issues have been correctly identified and adverse impacts sufficiently mitigated, including:

- Identification of a bat roost in the Headmaster's Cottage, where any works affecting the roof may require derogation under a development licence from Natural England. This is likely to be for disturbance only, since the roost will remain available post construction and it is likely that a licence for these works would be forthcoming*
- Identification of a roosting Bechstein's bat(s) in a tree that will be removed to enable the development. Derogation under a NE licence will be required. The mitigation proposed to address impacts on this bat roost is sound and is standard practice.*

Together with provision of additional roosting and foraging opportunities, it is likely that a NE licence for these works will be forthcoming.

- *Acknowledgement of the existing record and monitoring history of the Lesser Horseshoe bat maternity roost in the small shed on the northern side of the walled garden, which is outside of the current application red line but within the existing school grounds. The roost will not be directly impacted by the proposal. Compensatory habitat planting plus additional planting will ensure no residual adverse impacts on this species either during construction or operation phase of the project.*
- *Presence of barn owl, badger, nesting birds, reptiles and other wildlife species both within the existing school grounds and within the current application red line and sufficient mitigation against potential impacts both during construction and during the operational phase of the project.*

Existing protected habitats and species records for the area (as supplied by Wiltshire & Swindon Biological Records Centre on request) have also been taken into account to help inform the context of mitigation and additional habitat creation and enhancement.

Management of Sensitive Ecological Features –

A draft Construction Ecological Management Plan (CEMP), as Landscape and Ecological Management Plan (LEMP) and a Lighting Strategy have been submitted as part of the application. I am in agreement with the prescriptions in the two management plans and the detail in the lighting plan. Both management plans make provision for update prior to works starting on site, essentially to capture any requirement for change in relation to ecology. I therefore request conditions as set out below to ensure that these updates are made and submitted for approval prior to works commencing.

Biodiversity Net Gain –

The design of the proposal includes significant habitat creation which will deliver net gain for biodiversity over and above all required mitigation. The Biodiversity Metric 2.0 which has been developed by Natural England for calculating biodiversity net gain, has been correctly used to quantify and qualify the habitats to be created. There is, as yet, no mandatory requirement for a specific amount of biodiversity net gain, (this is expected in 2023), however a site of this size, for a development of this nature would be expected to deliver significant gain. The habitats created both to mitigate the impacts of development and also to provide net gain for biodiversity will include areas of species rich, semi-improved grassland, wet woodland, new hedgerow planting (incorporating a dark corridor specifically for bat foraging and commuting but also supporting other small mammals and birds) and additional tree planting. Overall, the project will deliver more than 10% net gain for biodiversity within the site. This in turn will benefit biodiversity within the wider local area as it will improve primary connectivity between different habitat areas both within and around the site, thereby increasing the functionality of the habitats for a range of wildlife species within the local area, specifically bats, birds and small mammals.

Summary –

I am satisfied that sufficient survey has been carried out and that sufficient mitigation has been included within the project design to eliminate potential residual adverse effects on protected habitats and species. In addition, the site will be considerably enhanced for the benefit of biodiversity.

Wiltshire Council Highways: No objection to the proposal. Some outstanding concerns relating to construction traffic access (officer note - which can be handled by way of a condition at this stage)

The general arrangement of proposed access/parking/turning facilities within the site is satisfactory. The proposed access to the site for operational purposes via the existing south entrance (which is the existing arrangement) is also likely to be satisfactory.

The draft Travel Plan is satisfactory.

However, the proposed temporary access to the site for construction purposes via the existing north entrance poses potential safety issues that are unresolved

The application proposes using the northern Lodge entrance for the construction access for the duration of the project which is estimated at 19 months. the CEMP suggests that the construction access, which is to a 50 mph section of class I road and has very poor visibility which cannot be improved without unacceptable loss of vegetation (see Appendix O of the TA), can be controlled by multiple way temporary traffic signals.

Temporary signals require typical stopping sight distance (SSD) for the road speed visibility to the signal heads, which requires severe vegetation removal and is therefore discounted. The relevant guidance is a related reading of TAL 2/11, DMRB CD 123, and CD109.

What is clear in the TAL, is that the signal control has a limit of control of 300m and it appears that to gain 160m visibility to the signal head (for northbound traffic), it would need to be positioned relatively close to the main access, with the controlled area being [c.] 294m. So in theory it could be done, but would mean a significant extent of highway under signal control for a relatively limited number of vehicles

It should also be noted that both the TA and CEMP only consider tracking in of a vehicle and no commitment is actually made to the tracking out onto the highway.

However, temporary signals, even if safe visibility could be achieved, would not be accepted on a class I road for a construction project of this relatively minor nature for such an extended period.

Wiltshire Council Leisure: no objections

Wiltshire Council Public Protection: no objections

Wiltshire Council Waste: no objections/comments

Historic England: no comments. For local conservation advisers to consider.

Sport England: No comments

I am of the view that the proposed area of the site is not considered to form part of or constitute a playing field as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No.595), therefore Sport England has considered this a non-statutory consultation.

As the proposal does not have any impact on any existing sport facilities or playing fields and does not generate significant demand for new indoor or outdoor sports facilities, Sport England has no comments to make.

Environment Agency: no objection, subject to informatives.

Wessex Water: Comments

*There is a 4" water main running directly through the site, In accordance with Wessex Water Policy, there must be no building within 3m either side of water main and no tree planting within 6m. This includes no surface water attenuation features and associated earthworks in the easement strip. The water main must not run through enclosed gardens, it must be within a 6m (3m either side) open access easement strip or roads. Wessex Water will always require unrestricted access to repair and maintain the main. application for a sewer diversion (at the developers cost) can be permitted but the developer must prove that there will be no loss in hydraulic capacity within the diverted sewer, all new sewers must be constructed to the standards set down in the Design and Construction Guidance (DCG) (formally Sewers for Adoption Guidance). Early consultation with or Sewer Protection Team is advised.
....*

The site is located within the Bristol Avon Catchment, this is a nutrient neutral catchment

Surface Water Drainage -

The applicant has indicated within the details submitted, an intention to utilise suds with a discharge to existing watercourse around the site, the design of this and the flow rates and volumes of discharge will need to be agreed with the LLFA.

Water Infrastructure –

Wessex Water will provide a point of connection for new water mains to be laid into the development site, either through a Section 41 agreement or a self-lay arrangement. Developers may connect to our water network on a size for size basis at their cost and Wessex Water will undertake any network reinforcement that may be required to accommodate granted development, this is funded through our infrastructure charging arrangements. Upon grant of planning Wessex Water will undertake a modelling exercise to determine the impact on our network and manage any necessary improvements.

8. Representations

The application has been publicised by way of newspaper advert, site notices and neighbour letters. Representations have been received from two interested parties - 1 objection and 1 comment.

The objection is summarised as follows –

- Adverse impact on ecology – proposed mitigation does not adequately compensate for loss; external lighting likely to be harmful to bats; bat mitigation would not seem workable; Main Block is proposed to be sited on wildlife corridors.

The comment is summarised as follows –

- Salisbury & Swindon Swift Group request integration of habitat opportunities for swifts.

9. Planning Issues

9.1 Principle

Although the Settlement and Delivery Strategies of the Wiltshire Core Strategy seek to direct new development to locations within or close to sustainable settlements rather than in the

open countryside, Silverwood School is acknowledged to be a long-established educational facility which is well suited to meeting the special educational needs of its pupils. Its improvement and expansion to continue to meet these needs into the future is, therefore, considered appropriate.

The National Planning Policy Framework is supportive of new educational development in general, noting in particular that it is important that there is a sufficient choice of school places to meet the needs of existing and new communities. It states –

.... Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

- a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and*
- b) work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted*

Applying a proactive, positive and collaborative approach here, it is considered that the suitability of this established school site for improvement and expansion as proposed does, as a matter of principle, comply with the NPPF. The specific circumstances of the site are considered in greater detail below.

The decision by Wiltshire Council to bring together three special schools on to a single site at Silverwood School has been made and is not a planning matter for consideration in this application. The purpose of this planning application is to assess the planning merits of the specific proposal, with particular regard to matters including landscape and visual impact; heritage impact; highway safety; ecology impact; drainage; and residential amenity in general.

9.2 Landscape and Visual Impact

Core Policy 51 ('Landscape') of the Wiltshire Core Strategy (WCS) re-states that new development should protect, conserve and where possible enhance landscape character, with any negative impacts mitigated as far as possible through sensitive design. The policy states that proposals should be informed by and be sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s) and any other relevant assessments and studies; and proposals will need to demonstrate that the following matters in particular have been taken into account and landscape conserved and enhanced as appropriate:

- The separate identity of settlements and the transition between man-made and natural landscapes;
- Visually sensitive skylines, soils, geological and topographical features;
- Landscape features of cultural, historic and heritage value;
- Important views and visual amenity;
- Tranquillity and the need to protect against intrusion from light pollution, noise and motion; and
- Landscape functions including places to live, work, relax and recreate.

Core Policy 57 ('Ensuring high quality design and Place Shaping') of the Wiltshire Core Strategy provides more general development control standards, requiring new development to, in particular, respond positively to existing townscape and landscape features in terms of building layouts, built form, height, mass, scale, building lines, etc., to effectively integrate

development into its setting. It also requires the retention and enhancement of existing important landscaping and natural features, including trees, hedgerows and watercourses.

The site itself is not located within a designated landscape area. The North Wessex Downs Area of Outstanding Natural Beauty lies approximately 2km to the east of the site and overlooking the site from the east is Oliver's Castle which is an Iron Age Hillfort and Scheduled Monument. The site is located within the Bristol Avon Clay Vale (BACV 10) in the Kennet District Landscape Character Assessment.

The design of the proposed new build elements of the development is contemporary – the main block is two storeys with a flat-roof. This approach compliments other more recent additions at the site, notably the Buzzard Block. The new build elements would be set within fully landscaped grounds, to again enable them to blend and naturalise with their surroundings.

The application is accompanied by a Landscape and Visual Impact Assessment (LVIA) which assesses the landscape and visual effects of the proposed development. It does this by applying established LVIA methodology – to define baseline conditions, to determine the sensitivity of receptors, to determine the nature of effects (that is, the magnitude of change) and to assess whether a likely significant landscape and visual effect would be experienced by any receptor, taking into account any proposed mitigation measures.

9.2.1 Landscape effects –

The LVIA defines 'landscape character assessment' as the process of "... identifying and describing variations in the character of the landscape. It seeks to identify and explain the unique combination of elements and features (characteristics) that make landscapes distinctive".

In terms of baseline conditions, the site is located in the 'Avon Vales' National Landscape Character Area. This area is bounded by designated landscapes; the Cotswolds AONB to the west and the North Wessex Downs AONB to the east. In summary, the 'Avon Vales' is described as having a distinct restful and undramatic charm of its own:

"This is an undulating, low-lying landscape of mixed, predominantly pastoral agriculture and small limestone-built towns, cut by the (Bristol) River Avon and its tributaries, and surrounded to the west, south and east by higher land. Woodlands lie on the steeper slopes and by watercourses, and in a few other areas within a structured farmland of medium to large fields and now straggly hedgerows. It is more than 80 per cent agricultural (both arable and pasture, with some localised nurseries and market gardening) and less than 10 per cent urban".

Locally, the Kennet District Local Landscape Character Assessment (KDLLCA) classifies the area in which the site is located as being within the Bristol Avon Clay Vale (BACV 10) Landscape Character Area. The KDLLCA sets out its characteristics as including:

- *Distinctive lowlands characterised by low lying, flat farmland*
- *Strong riparian character*
- *Well treed*
- *Open arable and mixed farmland*
- *Pasture, both permanent and reseeded, although the latter predominates*
- *Low-lying, gently undulating or rolling farmland with a definite hedgerow structure, ranging from very weak and eroded to intact and strong*

- *Woodland/farmland mosaic - a more even mix between woodland and farmland which may range from woodland interspersed with blocks of pasture and arable land to vice versa*
- *Clay vale floor farmland typical of the flattest and lowest parts of the clay lowland*
- *Prominent network of drainage ditches*
- *Willow and alder conspicuous along ditches, watercourses and in hedgerows*
- *Mix of permanent and reseeded pasture with a good hedgerow structure, and the presence of mature trees both within hedges and as riparian features, notably willow and alder.*

Also included are the following:

Amenity landscapes -

- *Sports fields and other areas under amenity use, usually intensively managed.*

Formal Parkland and Designed Landscapes -

- *Areas of formal C18 and C19 designed parkland with a distinctively pastoral and mature character*
- *Characteristic features such as parkland trees set in pasture, avenues, rides, copses and blocks of woodland, lakes, formal gardens, estate boundaries (walls or railings), ornamental features, estate buildings etc.*

Estate Farmland -

- *Traces of a former parkland character or which displays typical estate characteristic*
- *Fields enclosed by blocks of woodland and belts of trees*
- *Regular single-species hedgerow trees, avenues*
- *Estate fencing (railings and post and rail)*

To the north-east of the application site is the Horton Down LCA. This area overlooks the Bristol Avon Clay Vale LCA, the closest part of it being the edge of the scarp landscape below Oliver's Fort at c. 2km away. Much of this landscape's unique character stems from its elevated and very open nature, the absence of trees and hedgerow, and the open and expansive intervisibility over the lower valley landscape of the Bristol Avon Clay Vale. All of the Horton Down LCA lies within the North Wessex Downs AONB. The Cotswold AONB is much further to the west, and not affected by the proposal.

Within this wider landscape context the site itself supports the former Rowdeford House country house and its parkland setting, and areas of related pastureland and woodland. The site retains its country house character, although its ca. 70 years use as a school is also clearly evident, notably in the form of more contemporary school buildings and structures and areas of hardstanding for school related servicing and parking. Overall the site and its immediate context are typical of the Bristol Avon Clay Vale LCA as described above.

Having regard to these circumstances of the site, the LVIA concludes that, taken in isolation, the site is typical of a landscape (specifically, the Bristol Avon Clay Vale landscape) which is widespread across the County, and not immediately distinct or unique; its current value in these terms is, therefore, 'medium' to 'low'. But – and having regard to the site's immediate character and context (and more specifically its relationship with other LCAs, its topography, boundary treatments, built characteristics, historic interest, and ecological interest) the overall landscape value is of medium value. By definition, medium value landscapes have some

ability to accommodate change without undue harm being caused to their underlying character. The LVIA concludes –

*Having considered the characteristics of the landscape resource, taken as a whole, the value of the Site and its context is assessed as **medium value**. The landscape is one that is undesignated, however, it contains valued components and is a landscape of moderate importance and rarity, valued at the local level especially by school users of the Site.*

This conclusion of the LVIA on the landscape value is agreed – the application site lies within a landscape of medium value. The landscape has the variety of characteristics and human interventions which are set out above – notably, the designed parklands, the flat or gently undulating farmland, the amenity land uses, the areas of woodland, and the scatterings of development. Within this context the introduction of further, appropriately sited and designed development at an established school site, would not cause harm to the landscape character of the area. Indeed, with the additional landscaping that is planned, the proposal would enhance aspects of the local landscape.

In summing up the impacts of the proposed development on the landscape character the LVIA states the following -

- *Retention of Character: The Development Proposals would maintain and reinforce the unique local sense of place created by the current school use of the Site.*
- *Local Character: The development would result in the loss of arable land in the north-western part of the Site which is unavoidable although a significant part of the Site would be used for landscape mitigation and enhancement purposes, especially along the Site's northern boundary. The character of the north-eastern edge of the Site would continue to integrate well with the character of the adjacent rural landscape.*
- *Enhancement of existing landscape character: In line with repair and enhancement measures suggested in the Landscape Character Assessment, the proposals would help to restore landscape structure by the introduction of new hedgerow and tree planting, and the creation of additional habitat areas in the north-eastern pasture field and along the northern boundary adjoining the clay vales farmlands.*
- *Overall: The proposals would help to reinforce the landscape character of the northern edge of the development by restoring and strengthening the boundary features of this landscape with native tree and hedgerow shrub planting which would provide a strong landscape framework to the new development in the longer-term.*

9.2.2 Visual effects -

Visual effects are the changes to what can be seen by people as a result of what is proposed.

The LVIA includes a detailed assessment of visual effects from a number of agreed viewpoints. The locations of these viewpoints and their sensitivity to change are set out in the following table –

Visual Receptor	Value/ Susceptibility:	Receptor Sensitivity:
VR1: Receptors using local PRoW - ROWD6 <ul style="list-style-type: none"> Walkers 	High value attached to open and close-range views of the Site whilst engaging in recreation.	High
VR2: Receptors using the A342 <ul style="list-style-type: none"> Motorists, Pedestrians/ Walkers, Cyclists and Horse riders 	Medium-low value attached to glimpsed views of the Site whilst travelling through the landscape.	Medium to Low
VR3: Receptors arriving On Site at the Gatehouse (private land) <ul style="list-style-type: none"> Residents 	High value attached to views and proprietary interest in open and close-range views of the northern part of the Site.	High
VR4: Receptors arriving On Site at the School Driveway (private land) <ul style="list-style-type: none"> Site Users 	Medium value attached to close-range views of the southern part of the Site including the historic Rowdeford House, but users with their primary focus on the Site as 'workplace'.	High
VR5: Receptors using local (mid-range) PRoWs including BROM24 <ul style="list-style-type: none"> Walkers, possibly cyclists or Horse riders 	Medium-Low value attached to medium range intermittent views of the Site whilst engaging in recreation.	Medium to Low
VR6: Receptors using distant (long-range) PRoWs including BROM56 <ul style="list-style-type: none"> Walkers, Cyclists and Horse riders 	High value attached by recreational users to wide open views (of which the Site forms a very small part) from well-known vantage point.	High

For each visual receptor the LVIA draws the following conclusions –

VR1 - Receptors using prow rowd6

People using the waymarked local footpath along the eastern boundary (ROWD6), have a high sensitivity to close-range and open views of the Site whilst engaged in walking activity. The development proposals are contained within the northern fields of the Site and this footpath would pass within 250m of the new building for the full length of the footpath as it crosses the field, around 160m in length.

*It is considered that there would be a **moderate adverse magnitude of impact** on visual amenity experienced from this section of the route resulting in a direct **major adverse significance of effect (significant)**; the development would cause a moderately detrimental effect on the character of the scene. However, this would be mitigated by substantial habitat tree planting proposed within the north eastern field of native tree and shrub planting along the top of a bund running north to south across this field. Over time, the planting would break up direct views of the new building and helping to partially screen and separate the viewer from the Proposed Development.*

Overall, it is predicted that the significance of this effect would reduce as the proposed planting establishes and develops.

VR2 – Receptors using the a342

Due to the dense screening provided by the Site boundary woodland vegetation along the A342 there is very limited opportunity to see within the Site, limited to the two entrance locations. From further north, it would be possible to glimpse views of the Proposed Development through narrow gaps in the field edge vegetation along the eastern edge of the A342, whilst travelling south.

*The Development Proposals would have a negligible impact on glimpsed views though at the Site entrances, or from gaps in hedgerow vegetation just to the north of the Site, particularly as these users are likely to be concentrating more on the road ahead and traffic conditions. Overall, there would be **neutral effect** on these users.*

VR3 – Receptors arriving on site at the gatehouse (private land)

It has been established that these private householders do not have views from living spaces within their single storey property due to the timber close board fencing enclosing the garden and screening windows. However, they do have open, tree-filtered 'rural' views from external areas around their house.

The Development Proposals would be visible from external areas and the closest northern wing of the building would be visible 120m away, but views would be partially filtered by the two large mature oak trees retained in the top north-west corner of the Site.

The effect on visual amenity would be slightly mitigated by the building levels being sunk lower into existing levels by 2 metres in this top corner. A painted weldmesh fence is proposed to secure the building line in this top north-west corner. This would also be visible to these householders.

*In summary, the development would be clearly visible from this location to these residents, however, this would be limited to views whilst they are outside their private property, minimising the overall impact on their visual amenity causing a **slight adverse magnitude of impact** and resulting in an **intermediate adverse significance of effect** overall.*

VR4 – Receptors arriving on site at the school driveway (private land)

The Development Proposals include removing some lower Category flowering trees along the driveway to allow for road widening. This would partially open out views across the parkland (currently used as games pitches) and towards Rowdeford House sitting behind a very large mature London Plane tree.

From this driveway it would also be possible to see the edge of the parkland landscape setting defined and enclosed with native tree and shrub vegetation, but the building itself would be mostly hidden from view behind Rowdeford House until the point that vehicles pass alongside Buzzard Block and enter the Site itself.

*The mitigation planting would define the parkland landscape setting to the north and screen the new car park within the development area. In summary, it is considered that there would be a **negligible magnitude of impact** on Site users in this context resulting in a **neutral significance of effect** overall in that the development does not detract from views of Rowdeford House in its setting.*

VR5 - Receptors using local (mid-range) prows including brom24

Overall, the Development Proposals would have a **negligible impact** on the visual amenity experienced by these users due to the relative distance from the Site itself (over 850m), the flat intervening landform that does not provide elevated vantage points, and the nature of gappy hedgerow vegetation and trees, intermittently filtering or fully screening possible views. The mitigation tree and shrub planting along the northern boundary would further block glimpsed views towards the Site and the building itself.

There would be a **neutral significance of effect** of proposals on the enjoyment of people using public footpaths to the north of the site for recreation.

VR6 – Receptors using distant (long-range) views including brom56

..... the Site forms a very small part of the overall expansive views experienced from these elevated viewpoints. Whilst the photographic viewpoint shown assumes the Site is at the centre of the view, in reality, the viewer has the ability to take in well over 180 degrees of panorama from the scarp landscape and may not face towards the Site from this viewpoint at all.

However, assuming the viewer is facing towards the Site, it would be possible to pick out the proposed new building. As described, the Site sits well within a 'wooded' parcel of land with large mature parkland trees and this would help to conceal it.

Furthermore, the building mass from this angle would not appear as a solid mass but made up of three smaller wings, or smaller building blocks. Added to this, the material palette of natural colour tones would visually blend the building well into the landscape. The northern boundary tree and shrub planting to the mound would further help screen and enclose the Site visually within a 10 years' timeframe to screen the building.

The roof to the new building is flat and covered with a dark grey roof covering which would be visually recessive. Some solar reflections from the photovoltaic roof panels are predicted to be experienced from long range views, but the Solar Photo Voltaic Glint and Glare Study has determined that the overall impact upon the AONB receptor is low.

In summary, the Proposed Development would be partly visible in the early years following completion before vegetation has matured, but it would appear as a small feature in this view and would not be clearly discernible so is considered would cause a **negligible adverse magnitude of impact**. Overall, it is considered that the proposals would have a **neutral significance of effect** on visual amenity from these viewpoints.

These conclusions of the LVIA on the visual effects of the proposal are agreed. In the main the effect of the proposal on key visual receptors would be neutral and/or of negligible impact. Notably many of the local views – such as from the A342 – would be largely screened by established landscaping or would be at a distance. In more distant views – such as from the high ground of the AONB – the proposed development would merge into the panorama, along with other villages and other scattered developments visible in these views. Accordingly, no adverse effects would be caused to the AONB.

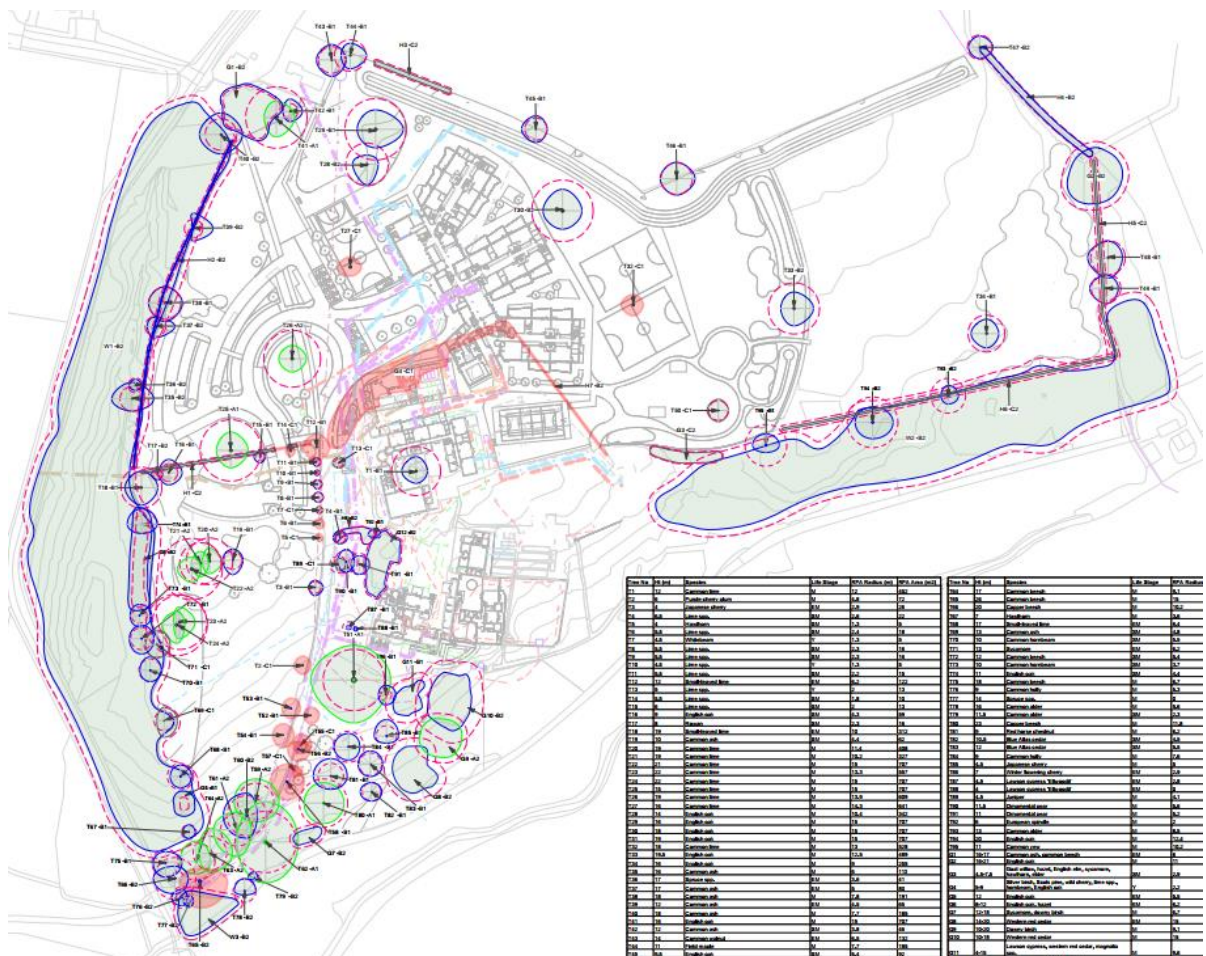
On View Receptor VR1, the effect of the development would be slightly greater. However, this is not considered to amount to a reason to reject the proposal. The separation between the footpath and the view is c. 250m; the view from the footpath is already of the school – this view would change by the introduction of a well-designed new school building in addition to the existing school buildings; and in time the planned new landscaping would soften, and to a certain extent, screen the new development in any event.

The same principles apply to the private views from View Receptor 3. This former lodge to Rowdeford House presently has views into the school. These views would remain, albeit with the new school buildings and ancillary development included. This change would not be detrimental to residential amenity, and the quality design of the development and the inclusion of landscaping would ensure the views remain pleasant in any event.

9.2.3 Tree removal and planting –

The application is accompanied by an Arboricultural Impact Assessment. This confirms that the majority of the many trees and hedgerows on the site would be retained. This said, some are proposed to be removed to enable the development. The circumstances of these trees and the reasons for removal are explained in the following extract from the Assessment -

Thirteen individual trees, one group of trees and one hedge are proposed to be removed... [shown coloured red on the following survey plan] -



Japanese cherries T55 (C1) and T56 (B2), lilac T57 (C1) and copper beech T58 (B1). The trees are small to medium sized trees with low visual impact and more limited SULEs. In particular, I consider that bird cherry is an inappropriate species for long term retention in close proximity to the drive. Similarly, beech T58 has a spreading habit and is unlikely to attain a graceful specimen form in maturity. In the context of the desirability of widening the access drive along its existing route, rather than realigning or rerouting it, I consider that these removals are acceptable and of low overall visual impact.

Small-leaved lime T12 (B1) is an early-mature tree with a low crown that reaches the ground. Its primary stem union is developing an included-bark union; a defect that may predispose the tree to structural weakness in the future. Removal of the tree is required to allow groundworks to provide the primary vehicular access to the proposed Silverwood School. An attempt to retain the tree would be misguided.

Group G4 (C1) is a closely-planted spinney of young trees planted to provide screening against modern development within the existing Rowdeford School. As part of development of the new Silverwood School, the group would be removed to provide space for the proposed new energy centre, school buildings, footways and new soft landscaping. Most trees within the group are <150mm stem diameter and are planted too densely to reach maturity in any case (without significant thinning work). Overall, the proposed removals are acceptable in the context of the scale of the proposed development, and their loss can be adequately compensated with new tree planting.

In addition to the removals above, two short sections of planted hedgerow H1 (C2) would be removed for the new car park access and landscaping, with a negligible visual impact.

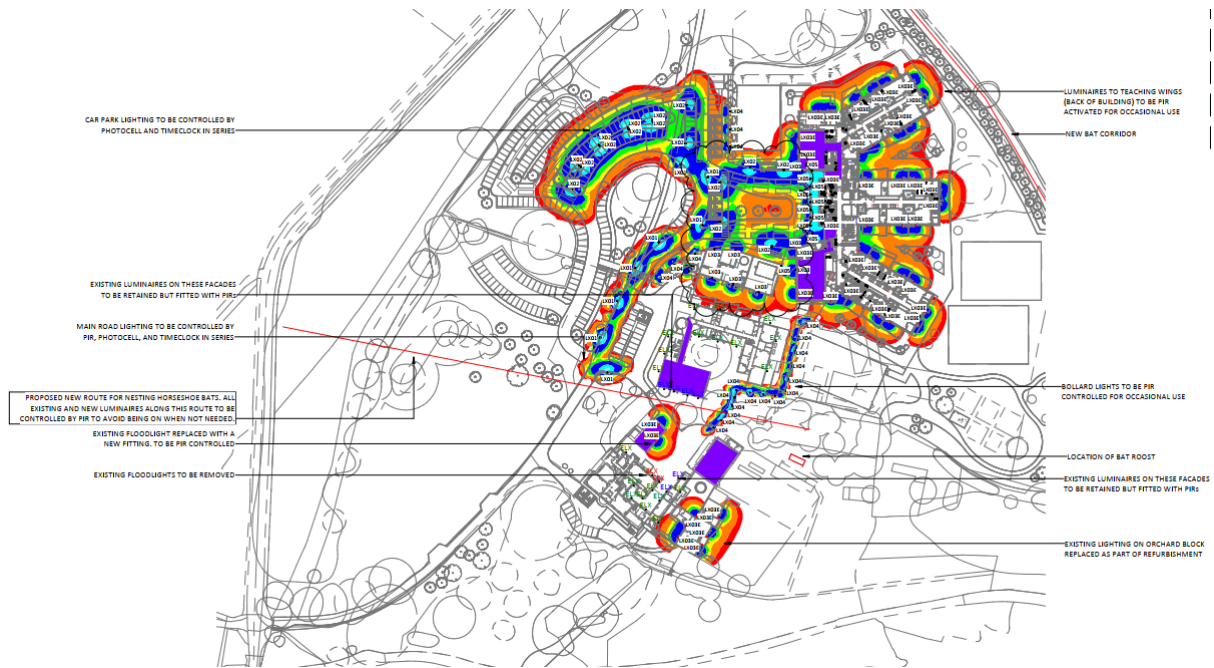
The soft Landscape Strategy for the site proposes 56 new specimen trees planted, along with a new woodland and areas of tree and shrub planting. Six new trees would be planted to compensate for the loss of 5 Category B trees for the driveway widening. Within the new school, trees would be planted to provide screening against the new car park, and at the school frontage and within the school courtyards to soften the built form.

In addition to the new specimen tree planting, a new native-species wet woodland in the east of the site (which is prone to flooding) would extend the adjacent wet woodland habitat. Along the north site boundary and through the site, new tree, shrub and hedge planting would provide three bat corridors to link existing bat navigation routes and increase biodiversity by creating additional wildlife habitats. The corridors would also screen and create soft boundaries.

Overall, the new tree planting proposals would adequately compensate for the proposed tree removals and would respectfully enhance the existing parkland tree population.

9.2.4 External lighting -

The application is accompanied by a Planning Statement for Lighting and related plans which set out details of all new lighting. The 'light spill' plan showing the location of the new external light and the extent of light spill is shown on the following plan (light spill indicated by the colours).



As is evident, new external lighting would be kept to a minimum, and configured/directed to just light the areas required to be lit – specifically, entrance courtyards and those parts of the car parks to be used outside of daylight hours. Areas to the rear of the Main Block and other school buildings would be motion activated to ensure no lights on when not required. This lighting strategy would ensure acceptable impacts on visual amenity / ‘dark skies’ and other interests of acknowledged importance – notably ecology, discussed later in the report.

9.2.5 Landscape and visual impact – conclusions

To conclude, it is considered that as the site lies within a wider landscape which can fairly be described as having an ‘ordinary’ character, and as it supports an established school, the proposals – which are of high-quality design – would not have harmful impacts on the landscape character of the area. Indeed, and as the LVIA concludes, there would be significant and long-term effects which would be beneficial to the landscape, notably in terms of the planned new landscaping.

In visual terms the site would accommodate the proposed development without causing any adverse effects (in both summer and winter) beyond the site itself. There is very limited visibility of the site within the wider landscape with views often restricted to close-range only (within 250m distance) due to intervening existing trees and vegetation. The only significant visual effects predicted would be from footpath ROWD 6 by reason of the sensitivity of this receptor and its proximity to the site, which is unavoidable. The scale, location and form of the proposed development helps to reduce and mitigate these effects. And in any event, glimpsed views of a high-quality development intended to provide state of the art facilities at an established school are not considered inappropriate.

9.3 Highway safety

Core Policy 61 (Transport and New Development) of the WCS states that new development should be located and designed to reduce the need to travel, particularly by private car, and to encourage the use of sustainable transport. The policy further requires that new development is capable of being served by safe access to the highway network. Core Policy 62 (Development Impacts on the Transport Network) requires new developments to provide

appropriate mitigating measures to offset any adverse impacts on the transport network at both the construction and operational stages.

With particular regard to Core Policy 61, the site's location in the countryside means that there would be an increase in traffic as a consequence of the proposal, including private cars. However, the circumstances of this particular school mean that an exception to the normal preference to reduce the need to travel can be made. Those circumstances are described in the Supporting Statement in the following terms –

.... Rowdeford School site is a rich learning environment for its students. A symbiosis of biodiversity and landscape, heritage and history culminate in a setting which can offer both grounding and stimulating sensory experiences to those attending the school.

9.3.1 School Traffic -

In accordance with the NPPF, the planning application is accompanied by a Transport Assessment and Travel Plan. The Transport Assessment (TA) compares existing flows on the A342 with the flows arising as a consequence of the proposal, this including in 2023 when the new school would open. As a consequence of the analysis, the TA concludes the following –

The A342 in the vicinity of Rowdeford School is subject to a 50mph speed limit with a footway on its eastern edge. The Rowdeford School access has been improved over recent years including widening of the entrance gateway by rebuilding the right-hand side stone pillar and lowering of the boundary wall to improve visibility. However, the school access drive is narrow and despite having a number of passing bays restricts the free flow of traffic at peak times. The existing level of parking provision on site is insufficient to cater for existing demands at peak times with staff and visitors regularly having to park on the grass sport pitches.

The proposed Silverwood School (Rowde Campus) will result in increased demands for all modes of travel as a consequence of the increased staff and pupil numbers. To estimate the likely increases in traffic generation and car parking demand, traffic surveys undertaken at the A342 Rowdeford School access in 2019, prior to the Covid-19 pandemic, were utilised. TEMPRO traffic growth was applied to the A342 traffic with the school traffic growth (pro-rata) reflecting the increased pupil numbers envisaged for the proposed new school.

A capacity assessment of the A342 site access junction was carried out allowing for the additional traffic from the proposed new school expansion and traffic growth to 2023. This demonstrated that the junction would operate with sufficient spare capacity during peak times of the day with no issues of queuing traffic on the A342.

Improvements to the existing school access on the A342 are proposed to help mitigate the additional demands associated with the proposed new school. The improvements comprise widening of the school access drive (minimum 5.2m) to allow unhindered two-way traffic movements, realignment of the eastern kerb line of the A342 to improve exit visibility and footway provision, enhancements to the existing footways and crossings, and improvements to the existing bus stops providing formal waiting areas and bus shelters.

Given the increased use of the site access as a result of the development proposals, and to improve the environment and safety for pedestrians, it is considered sensible to explore the potential for extending the existing 30mph speed limit and gateway to a location further north along the A342 to include the site access to the new school. This would require the agreement of the highway authority and local stakeholders and would be the subject of a Traffic Regulation Order (TRO).

A new car parking area for 209 cars (including disabled, visitor and electric vehicle charging points) is to be constructed which together with the retained existing car parking will deliver a total of 239 car parking spaces on site. This level of parking provision is in accordance with Wiltshire Council's standards and following car parking accumulation analysis based on the predicted traffic generation, is well placed to accommodate the anticipated car parking demands for the proposed new school. A total of 12 spaces will be provided for Blue Badge disabled car parking.

To accommodate the minibuses which will be used to transport pupils to/from the school at peak times, a new drop-off / pick-up facility is to be constructed providing parking for 16 minibuses. It is to be located adjacent to the main entrance with good pedestrian links to ensure that pupils can easily and safely access the school buildings. Space within the proposed new car park will provide stacking capacity for minibuses waiting to access the drop-off / pick-up at peak times.

The broad conclusions of the TA relating to operational traffic are agreed. In particular, that the A342 has capacity to accommodate additional operational traffic that would be generated by the proposal, and that the existing south access is adequate to safely manage the movements to and from the site (this subject to the school's main drive being widened and some relatively minor works to the A342). The proposed level of car parking is appropriate for the demands of the school, and would address the existing sub-standard situation.

With specific regard to the suggestion in the Transport Assessment that a reduction in the existing speed limit on the A342 within the vicinity of the southern entrance should be explored, this is a matter for the standalone Traffic Regulation Order (TRO) regime which has its own set of 'rules' for determining appropriateness and suitability of such a change, and with its own requirements for public and stake-holder consultation, all overseen by the local highway authority. It follows that this is not a matter for consideration now as part of the planning application process.

In accordance with the NPPF the application is accompanied by a Travel Plan to encourage travel by sustainable modes of transport. It sets out a package of measures designed to minimise private car use and promote more sustainable modes of transport (walking, cycling, public transport, car-sharing) for journeys associated with the school. It aims to improve safety on the school journey, cut congestion at the school gate, improve health and fitness through increased exercise, improve the environment and build links with the local community (including through improvements to the footways and bus stops on the A342 and secure cycle parking).

9.3.2 Construction Traffic –

For health and safety reasons it is proposed to keep construction traffic away from the working school by using the school's northern access for this purpose. This would require removal of the existing right-hand stone gate post and associated wall for the duration of the works (with re-instatement on completion); separate listed building consent has been applied for these works. Use of the northern access for construction traffic would also require construction sign posting and temporary traffic management on the A342, including traffic signals.

The Council's Highways Officer has raised a holding objection to the construction traffic management proposals in view of potential safety issues associated with the use of traffic signals in this location, and the resulting disruption that may be caused to traffic on the A342 for the duration of the works. The Highways Officer's preference would be for the south entrance to be used in a managed manner.

Negotiations are on-going, but as the management of construction traffic is not fundamental to the principle of the whole development, it is considered that it can be reserved for later determination. Accordingly, a condition is recommended requiring details of construction access to be first approved in advance of development commencing.

9.4 Heritage assets

The Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty upon local planning authorities in determining planning applications for development affecting listed buildings to have special regard to the desirability of preserving the special interest and setting of the listed building.

Core Policy 58 (Ensuring the conservation of the historic environment) of the WCS states that new development should protect, conserve and where possible enhance the historic environment.

The site supports a number of designated heritage assets – specifically, Rowdeford House and its ancillary outbuildings and walled gardens (including an apple store) (Listed grade II), and the gate posts and associated walls at both the southern and northern accesses (Listed grade II). The parkland grounds to Rowdeford House, and in particular those parts to the south and west sides of the house, lie within the curtilage of the house and are important parts of its setting.

The proposed new build elements of the proposal are located mainly to the north of the Listed buildings, beyond the more recent other additions to the school (notably the Buzzard Block). The separation between the new and original buildings would ensure that the impact on the latter is limited. The new car parks would be constructed partly within the parkland, although to the north of and, as far as is practical, separated from the original buildings. For these reasons the new car parks would, again, have only a limited impact on the listed buildings or their immediate settings, and this impact largely mitigated through new soft landscaping.

The southern gate posts at the start of the entrance drive would not be affected by the proposals. The widening of the southern drive is essential to the safety of its use and would not in any event have a harmful impact on the parkland setting of the school. The drive would retain its 'lane' appearance (without an over-engineered execution). The right-hand gate post and associated wall at the northern entrance would be temporarily removed to allow safe access for construction traffic. On completion of the works the gate post and wall would be re-instated like for like. In principle this is acceptable subject to the like for like reinstatement taking place. The southern gate post has already in the past been re-positioned to improve the safety at this access.

External (and internal) alterations to Rowdeford House to enable its re-purposing for new school related uses are generally of a minor nature and are acceptable to ensure the house continues in a use which will benefit its long term conservation. This includes adaptations to ensure safe access for all abilities where necessary. The works to Rowdeford House and its curtilage listed buildings, and the northern access gate posts and walls, are subject to a standalone Listed Building Consent application.

In terms of the NPPF, the majority of the proposals cause less than substantial harm to the heritage assets. The NPPF advises that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal. In this case the public benefit of the proposal is the creation of a new special school to meet this particular educational need. The same principle applies to the planned alterations to Rowdeford House. This public benefit tips the balance in favour of the overall proposal under the NPPF test. The removal of part of the

northern gate post and wall amounts to substantial harm to this listed building, although as the post and wall would be reinstated on completion of the new building works, this harm reduces to less than substantial. Ensuring the reinstatement is a matter for the Listed Building Consent application.

Overall, the proposal strikes the right balance between providing the new and necessary special school whilst safeguarding as far as is practical the heritage assets at the site. Critically the proposal ensures the long-term viable future of these assets. Their future would be potentially less secure in non-educational use.

Archaeological assessment of the site has revealed some minor artefacts. The County Archaeologist is satisfied that no further archaeological investigation would be required.

9.5 Ecology

The Wildlife and Countryside Act 1981 forms the main body of nature conservation legislation in England. Core Policy 50 (Biodiversity and Geodiversity) of the WCS requires development proposals to demonstrate how they will protect features of nature conservation interest. The NPPF advises that planning policies and decisions should seek to minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

An Ecological Impact Assessment (EclA) report accompanies the planning application. The EclA draws on information gathered from a desk study and data search as well as field studies carried out during 2019-2021. The EclA presents the current ecological baseline and informs a complete assessment of the potential effects of the proposed scheme on those ecological features associated with the site.

The site has no ecology designations. It does, however, support a bat maternity roost linked to the Bath and Bradford on Avon Special Area of Conservation. The surveys revealed a total of 10 bat species using parts of the site for foraging and commuting. They also revealed a badger main sett and outlying sett, and a single grass snake (indicating a potential low overall population).

In view of the site's ecological interests, the EclA provides an Ecological Mitigation Strategy which sets out measures to reduce the potential for adverse ecological effects in accordance with the mitigation hierarchy and relevant planning policy. These measures have also derived from ongoing consultation with WC's Senior Ecologist. The measures are summarised in the application Supporting Statement, as follows –

- *To support and protect the key connective habitat along the northern boundary a 12m wide dark bat corridor will be created along the northern boundary with a 6m wide bund created along the area directly to the north of the new school building to be planted with a mix of species including evergreens as well as large standard trees.*
- *Planting of the bat corridor to take place prior to the start of construction to provide immediate screening from potential light spill. Close board fencing will be erected to screen the corridor until vegetation has grown sufficiently.*
- *Dark corridors have been created or maintained elsewhere on the site including east to west and south to north in order to maintain commuting routes for lesser horseshoe bats to ensure the continued ecological functionality of the maternity roost on site which is linked to the Bath and Bradford on Avon SAC. Additional landscape planting, comprising standard trees and hedgerows, have been strategically placed in order to create and promote dark corridors across the site for bat species, in particular lesser horseshoe bats.*

- *None of the site boundary habitats will be exposed to operational lighting levels that exceed 0.5 lux to ensure their continued function for light sensitive species of bat and other nocturnal animals.*
- *An ecologically sensitive lighting strategy has been designed to ensure the continued ecological functionality of the site by bats, in particular lesser horseshoe bats. Luminaries have been selected to be LED type with a low colour temperature of 3000k and warm white. Luminaries within the site will be on timers and will function on PIR timers to ensure the site has minimal impacts on nocturnal wildlife from artificial lighting.*
- *Provision of a minimum of 20 no. artificial bat boxes that are known to support woodland specialist bat species including Bechstein bats to be mounted on retained mature trees throughout the woodland parcels on site prior to the start of construction works. 10 of these boxes will directly compensate for the loss of the Bechsteins roost in T27. These boxes will also benefit noctule bats after the loss of the mating roost in T31 came down due to high winds.*
- *Planting of approximately 1.196km of native species rich hedgerow to improve and enhance the ecological value and connectivity throughout the site achieved through the implementation of the dark bat corridor on the northern boundary and through enhancement of existing hedgerows.*
- *Creation of 0.46ha of wet woodland, 1ha of amenity grassland and 2.8ha of species rich neutral grassland plus additional tree planting across the site as part of the landscape strategy.*
- *Integration of bat tubes in suitable locations on the new school building to compensate for any new roosts that may be encountered during the 2021 bat building roost activity surveys. If no roosts are found, these will be classed as enhancement.*
- *Increased potential nesting and foraging habitat in newly created hedgerows, planted trees and within the bat mitigation corridor for common garden bird species. Plus the provision of 20 no. nest boxes within suitable mature trees.*
- *Hedgehog and badger access holes to be provided in the northern fence line to ensure commuting provision is maintained.*

In addition, a CEMP and a LEMP would be prepared and implemented to ensure ecology interests are protected at the construction stage and during the future operation of the school. Drafts of these documents accompany the planning application.

These proposed ecology mitigation measures are agreed by the Council's Ecologist. Indeed, they are considered to achieve the now required net gain for the ecological interests at the site. With particular regard to the other matters raised in the third-party representation, the mitigation is considered to be workable, and would provide new and improved wildlife corridors to compensate for those lost at the site of the Main Block. External lighting has already been discussed, the proposal being for the minimum necessary to enable the school to safely function, with all lights suitably cowled and directed (see light spill diagram, above), and with appropriate means of illumination and control. With regard to swifts and other birds, new hedgerows and nest boxes would provide for these.

In view of the proposed mitigation, the Council's Ecologist has been able to conclude that with the implementation of the mitigation measures outlined within the EclA, there will be no significant negative effect upon the integrity of the conservation status of the Bath and Bradford-on-Avon Bats SAC as a result of the proposed development either alone or in combination with other projects. Accordingly, a positive decision has effectively been made on 'Appropriate Assessment' of the proposals under the terms of the Habitats Regulations. This is, however, subject to agreement by Natural England; agreement has been sought. A 'shadow' Appropriate Assessment as prepared by the applicant's ecologist which will form the

basis of the Council's final Appropriate Assessment has been received and is available on the Council's planning application web site that holds the details of the proposal.

9.6 Residential amenity –

Core Policy 57 (Ensuring high quality design and place shaping) of the WCS requires new development to have regard to the compatibility of adjoining buildings and uses and the impact on the amenities of existing occupants, including the consideration of privacy, overshadowing, vibration and pollution (e.g. light intrusion, noise, smoke, fumes, effluent, waste or litter).

The site is largely self-contained and set within an open countryside meaning that there is significant separation from most residential neighbours. It follows that most neighbours would suffer no adverse effects at both the construction and operational stages of the new development.

There is one neighbouring property which is closer to the site, this being Rowdeford Lodge (the former lodge to Rowdeford House) which is adjacent to the northern entrance to the site. Notwithstanding its proximity to the school, there would still be sufficient separation between it and the proposed development to ensure no adverse impacts from the operation of the school on residential amenity.



Notwithstanding the response to the application from the Council's Highways Officer, during the construction stage construction traffic is proposed to use the northern access to the school and so pass by Rowdeford Lodge. This could lead to some occasional inconvenience to the occupier of the Lodge – for instance if a delivery to the site clashes with the occupier wishing to leave the Lodge. Such inconveniences are likely to be few and far between, and only during the construction stage and so would not amount to a reason for refusing planning permission. And in any event, the draft CEMP which accompanies the application states that close working and cooperation with residents (and the school itself) will take place throughout –

..... *Willmott Dixon* [the probable contractor] *will also liaise closely with the residents and the school on a regular basis to ensure that, as far as reasonably practicable, the works are coordinated to ensure minimum disruption. The Willmott Dixon Site Manager will also engage with the residents and school to ensure that they are fully aware of upcoming works so that they fully understand what is planned to happen and when*

The draft CEMP also specifies working and deliveries hours, which are considered appropriate for the circumstances of this particular site –

The intended working hours – subject to planning approval - are:

- *07:00 - 18:00 Monday to Friday, access onto site for our site staff and subcontractors from 07.00 but no noise producing works or deliveries until after 08:00.*
- *07:00 - 13:30 Saturday, access onto site for our site staff and subcontractors from 07.00 but no noise producing works or deliveries until after 08:00.*
- *Sundays and Bank holidays – no work where noise will be audible at the site boundary.*

..... Generally, the aim will be to carry out noisy works in normal hours. However, where this is not practical, measures will be put in place whereby any disruption is minimised.

9.7 Drainage

The application is accompanied by a Flood Risk Assessment and Hydraulic Modelling Report which raises no significant issues and is agreed by the Council's Drainage Engineer.

10. Conclusion

The proposal is in accordance with the NPPF and the planning policies of the local planning authority. When completed the development would provide a state-of-the-art educational facility for its pupils in an environment which is wholly suited to this purpose. As all matters of acknowledged importance are addressed in the application, approval is recommended, subject to conditions, including relating to the final details of the temporary access arrangements for construction traffic.

RECOMMENDATION

That subject to Natural England first agreeing the Appropriate Assessment required by the Habitat Regulations, that the application be approved, subject to the following conditions.

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

2. In respect of the new Main Block hereby approved no works of construction above ground floor slab level shall commence until details of the materials to be used for the external walls and roofs have been submitted to and approved by the local planning authority. The development shall be carried out in accordance with the approved materials.

All other elements of the development hereby approved involving alterations or extensions to existing buildings shall use external materials which, as far as practicable, match the materials used in the existing buildings.

REASON: In the interests of visual amenity and the character and appearance of the area.

3. All soft landscaping comprised in the approved details of landscaping shall be carried out in the first planting and seeding season following the first occupation of the building(s) or the completion of the development whichever is the sooner; All shrubs, trees and hedge planting shall be maintained free from weeds and shall be protected from damage by vermin and stock. Any trees or plants which, within a period of five years, die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species, unless otherwise agreed in writing by the local planning authority. All hard landscaping shall also be carried out in accordance with the approved details prior to the occupation of any part of the development or in accordance with a programme to be agreed in writing with the Local Planning Authority.

REASON: To ensure a satisfactory landscaped setting for the development and the protection of existing important landscape features.

4. No demolition, site clearance or development shall commence on site, and; no equipment, machinery or materials shall be brought on to site for the purpose of development, until tree protection measures are put in place in accordance with the details set out in the Arboricultural Impact Assessment report by Barton Hyett Associates dated May 2021, and;

The protective fencing shall be erected in accordance with the approved details. The protective fencing shall remain in place for the entire development phase and until all equipment, machinery and surplus materials have been removed from the site. Such fencing shall not be removed or breached during construction operations.

No retained tree/s shall be cut down, uprooted or destroyed, nor shall any retained tree/s be topped or lopped other than in accordance with the approved plans and particulars. Any topping or lopping approval shall be carried out in accordance British Standard 3998: 2010 "Tree Work – Recommendations" or arboricultural techniques where it can be demonstrated to be in the interest of good arboricultural practise.

If any retained tree is removed, uprooted, destroyed or dies, another tree shall be planted at the same place, at a size and species and planted at such time, that must be agreed in writing with the Local Planning Authority.

No fires shall be lit within 15 metres of the furthest extent of the canopy of any retained trees or hedgerows or adjoining land and no concrete, oil, cement, bitumen or other chemicals shall be mixed or stored within 10 metres of the trunk of any tree or group of trees to be retained on the site or adjoining land.

[In this condition "retained tree" means an existing tree which is to be retained in accordance with the approved plans and particulars; and paragraphs above shall have effect until the expiration of five years from the first occupation or the completion of the development, whichever is the later].

REASON: To enable the Local Planning Authority to ensure the retention of trees on the site in the interests of visual amenity.

5. Notwithstanding the details set out in the application particulars, no development shall commence (other than relating to initial pre-construction preparatory works - for example, for the erection of protective fencing) until a scheme to ensure safe entry and exit for all construction traffic has been submitted to and approved in writing by the local planning authority. Thereafter, and at all times, construction traffic shall be

managed strictly in accordance with the approved scheme for the duration of the construction works.

REASON: In the interests of highway safety.

6. No part of the new Main Block hereby permitted shall be first brought into use until the following works have been completed –
 1. the southern school access drive widening as detailed in the Transport Assessment;
 2. the construction of internal vehicle turning areas and vehicle/car parks and parking areas shown on the layout drawings; and
 3. the improvements to the A342 (comprising realignment of the eastern kerb line of the A342 to provide improvements to exit visibility and footway provision and enhancements to the existing footways and bus stops) as detailed in the Transport Assessment and shown on drawing no. W595/03 dated 15/03/2021.

The areas concerned shall be maintained for those purposes at all times thereafter.

REASON: In the interests of highway safety.

7. On first use of the Main Block element of the development hereby approved the School Travel Plan by PFA Consulting dated May 2021 shall be implemented. The results of the implementation and subsequent monitoring shall be made available to the Local Planning Authority on request, together with any changes to the plan arising from those results.

REASON: In the interests of road safety and reducing vehicular traffic to the development.

8. No external lighting shall be installed and/or operated on-site other than in accordance with the External Lighting Statement for Planning (RevC01) by Method Consulting and related drawings (External Lighting Levels - Typical (NWS-MET-ZZ-ZZ-DR-E-630115 A3-C01); External Lighting Levels - All New Fittings, including Escape Only (NWS-MET-ZZ-ZZ-DR-E-630114 A3-C01)). The approved lighting shall be installed and shall be maintained in accordance with the approved details and no additional external lighting shall be installed.

REASON: In the interests of the amenities of the area and to minimise unnecessary light spillage above and outside the development site.

9. The development shall be carried out in accordance with the 'Mitigation Requirements' set out in the Flood Risk Assessment and Hydraulic Modelling Report by Hydrock dated 30 March 2021.

REASON: To accord with the terms of the application and to safeguard the development from any possible flood risk.

10. The development hereby approved shall be carried out and latterly operated strictly in accordance with the 'Embedded Mitigation Measures' set out in the Ecological Impact Assessment (J00405 Version 1.0) by Johns Associated dated May 2021, including the 'Integrated & Embedded Ecological Mitigation and Enhancement Masterplan' (J00405-019 dated 21/05/2021). Where additional surveys are required these shall be carried out in accordance with the 'Additional Surveys, Mitigation and Compensation Requirements' section of the Ecological Impact Assessment.

REASON: To ensure the ecology interests of the site are suitably protected and enhanced.

11. No development shall commence on site (including any works of demolition), until a Construction Environmental Management Plan, which shall include the following:
 - a) the parking of vehicles of site operatives and visitors;
 - b) loading and unloading of plant and materials;
 - c) storage of plant and materials used in constructing the development;
 - d) the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
 - e) wheel washing facilities;
 - f) measures to control the emission of dust and dirt during construction;
 - g) a scheme for recycling/disposing of waste resulting from demolition and construction works; and
 - h) measures for the protection of the natural environment;
 - i) hours of construction, including deliveries;
 - j) procedures for maintaining good public relations including complaint management, public consultation and liaison;

has been submitted to, and approved in writing by, the Local Planning Authority. The approved Statement shall be complied with in full throughout the construction period. The development shall not be carried out otherwise than in accordance with the approved construction method statement.

REASON: To minimise detrimental effects to the neighbouring amenities, the amenities of the area in general, detriment to the natural environment through the risks of pollution and dangers to highway safety, during the construction phase.

12. Prior to the commencement of works, including demolition, ground works/excavation, site clearance, vegetation clearance and boundary treatment works, a Construction Environmental Management Plan (CEMP) shall be submitted to the local planning authority for approval in writing. The Plan shall provide details of the avoidance, mitigation and protective measures to be implemented before and during the construction phase, including but not necessarily limited to, the following:
 - a) Identification of ecological protection areas/buffer zones and tree root protection areas and details of physical means of protection, e.g. exclusion fencing.
 - b) Working method statements for protected/priority species, such as nesting birds and reptiles.
 - c) Mitigation strategies already agreed with the local planning authority prior to determination, such as for great crested newts, dormice or bats; this should comprise the pre-construction/construction related elements of strategies only.
 - d) Work schedules for activities with specific timing requirements in order to avoid/reduce potential harm to ecological receptors; including details of when a licensed ecologist and/or ecological clerk of works (ECoW) shall be present on site.
 - e) Key personnel, responsibilities and contact details (including Site Manager and ecologist/ECoW).
 - f) Timeframe for provision of compliance report to the local planning authority; to be completed by the ecologist/ECoW and to include photographic evidence.

The CEMP will update the draft version submitted with the planning application.

Development shall be carried out in strict accordance with the approved CEMP.

REASON: To ensure adequate protection and mitigation for ecological receptors prior to and during construction, and that works are undertaken in line with current best practice and industry standards and are supervised by a suitably licensed and competent professional ecological consultant where applicable.

13. Prior to the start of construction, a Landscape and Ecology Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The LEMP will include long term objectives and targets, management responsibilities and maintenance schedules for each ecological feature within the development, together with a mechanism for monitoring success of the management prescriptions, incorporating review and necessary adaptive management in order to attain targets.

The LEMP shall also include details of the legal and funding mechanism(s) by which long-term implementation of the plan will be secured. The LEMP shall be implemented in full and for the lifetime of the development in accordance with the approved details.

REASON: To ensure the long-term management of landscape and ecological features retained and created by the development, for the benefit of visual amenity and biodiversity for the lifetime of the scheme.

14. Prior to the commencement of the works for the widening of the existing driveway from the south entrance, details of proposed materials for the final surfacing shall be submitted to and approved in writing by the LPA, including details of any proposed kerbs. The final surfacing shall be carried out in accordance with the approved details.

REASON: To ensure a satisfactory appearance is achieved for the driveway to protect the setting of the Listed buildings and the associated parkland.

15. The development hereby permitted shall be carried out in accordance with the plans listed in the attached schedule of approved plans.

REASON: For the avoidance of doubt and in the interests of proper planning.

16. INFORMATIVE:
Safeguards should be implemented during the construction phase to minimise the risks of pollution from the development. Such safeguards should cover:

- the use of plant and machinery
- wheel washing and vehicle wash-down
- oils/chemicals and materials
- the use and routing of heavy plant and vehicles
- the location and form of work and storage areas and compounds
- the control and removal of spoil and wastes.

17. INFORMATIVE:
The development should include water efficient systems and fittings. These should include dual-flush toilets, water butts, water-saving taps, showers, and appliances with the highest water efficiency rating (as a minimum). Greywater recycling and rainwater harvesting should be considered.