### SECTION D DEVELOPMENT TO BE CARRIED OUT BY THE COUNTY COUNCIL

<u>Background Documents:</u> the deposited documents; views and representations received as referred to in the reports and included in the development proposals dossier for each case; and other documents as might be additionally indicated.

Item D1

Partial demolition of Adult Education Centre (AEC), and erection of a new 2 storey building within the retained façade at St John's Primary School, Canterbury–CA/12/1681 (KCC/CA/0338/2012)

A report by Head of Planning Applications Group to Planning Applications Committee on 12 February 2013.

Application by Kent Council Children Property Group for the partial demolition of building known as the AEC (Adult Education Centre), and erection of a new 2 storey building within the retained façade of AEC, new link to existing Primary School, minor demolition of part of WC on rear elevation of existing Primary School, and associated landscaping and external works, at St John's Primary School, St John's Place, Canterbury – CA/12/1681.

Recommendation: permission be granted subject to conditions.

Local Member: Mr Graham Gibbons

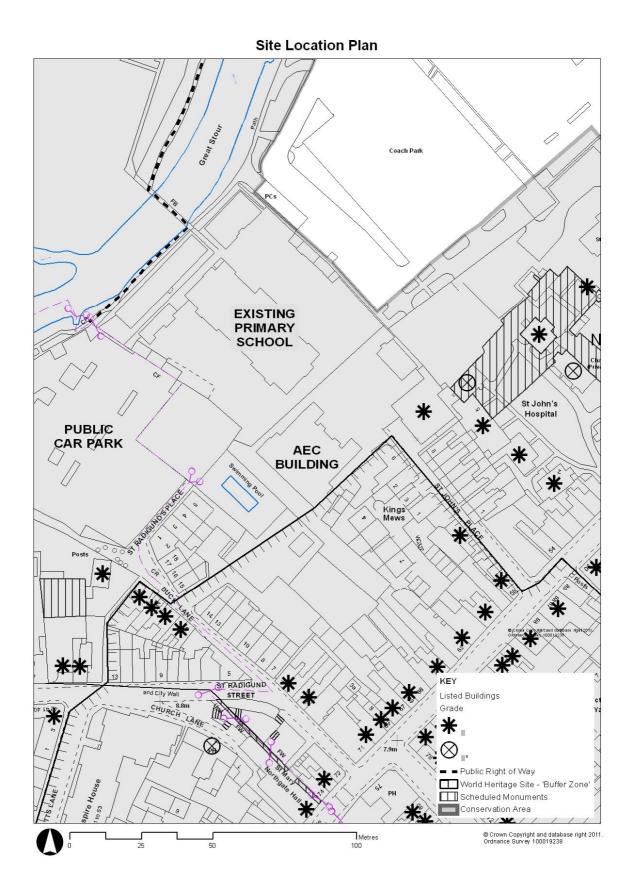
Classification: Unrestricted

#### Site

- St John's Primary School (formally Kingmead Primary School) is located within the City of Canterbury, to the east of the River Stour between St Radigund's Car Public Car Park and the City's main coach park. It is bounded to the south east by residential development, and local commercial/retail properties. The school site is currently accessed from St John's Place and Duck Lane/St Radigund's Place, which are narrow thoroughfares only really suited to single direction vehicular traffic, typical of many roads within the urban centre of Canterbury. The design of the Primary School building is typical of a late Victorian school building, and was completed in 1903. It is a two storey building composed of solid red brick walls with a steeply pitched clay tiled roof. Decorative stonework is used around the building for exposed window lintels, sills, entrance canopies and gable copings. Tall traditional timber sash windows and timber doors add to the architectural interest of the building.
- 2. The AEC building lies to the south of the Primary School, and is of a similar age and character, although single storey. The architecture is comparable to the Primary School in terms of material use, fenestration and proportion. However, the AEC has been unoccupied for a number of years and has suffered also through a lack of maintenance and general neglect. The main frontage of the AEC building faces a small car park area which was formally shared by the AEC and St John's Board School (now closed), located to the north east of the school site. The land immediately to the south west of the AEC building is currently fenced off and heavily overgrown, and contains the remains of an outdoor swimming pool. There is currently a footpath which runs between the fenced boundaries of the Primary School and the AEC, leading from St Radigund's car park to St John's Place. This footpath is not a Public Right of Way, but is used by members of the public as a cut-through.

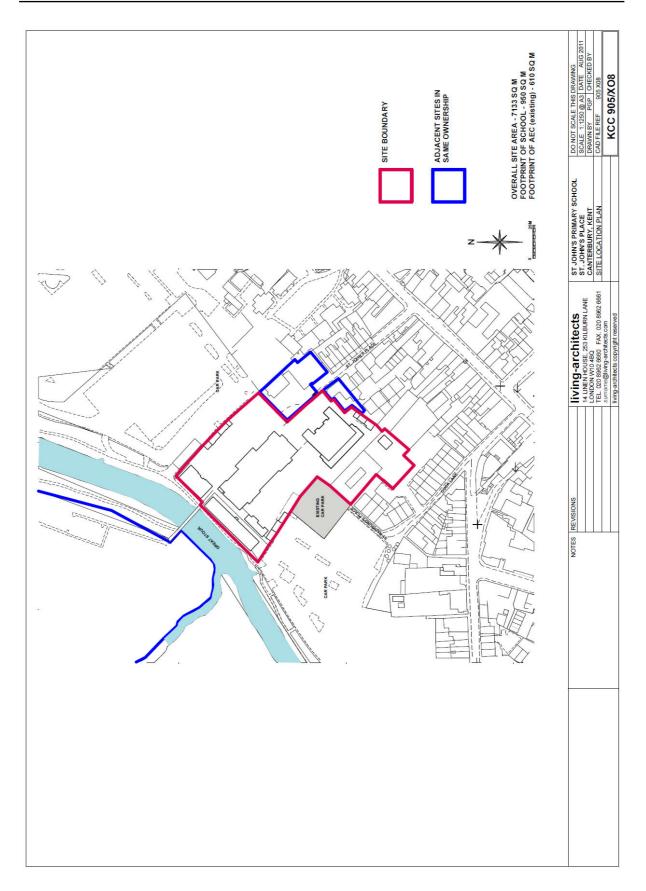
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### Wider Location Plan STONEBRIDGE Leisure Centre Park Playing Field Northgate Existing Coach School AEC Building Car Park Hall Sch ildhall Diocesan & Payne Smith School Sch FB Cathedral War Meml ĒΒ St Augustine's Coll FB Mus Abbey (remains of) Subways World Heritage Site and 'Buffer Zone' © Crown Copyright and database right 2011. Ordnance Survey 100019238



Item D1

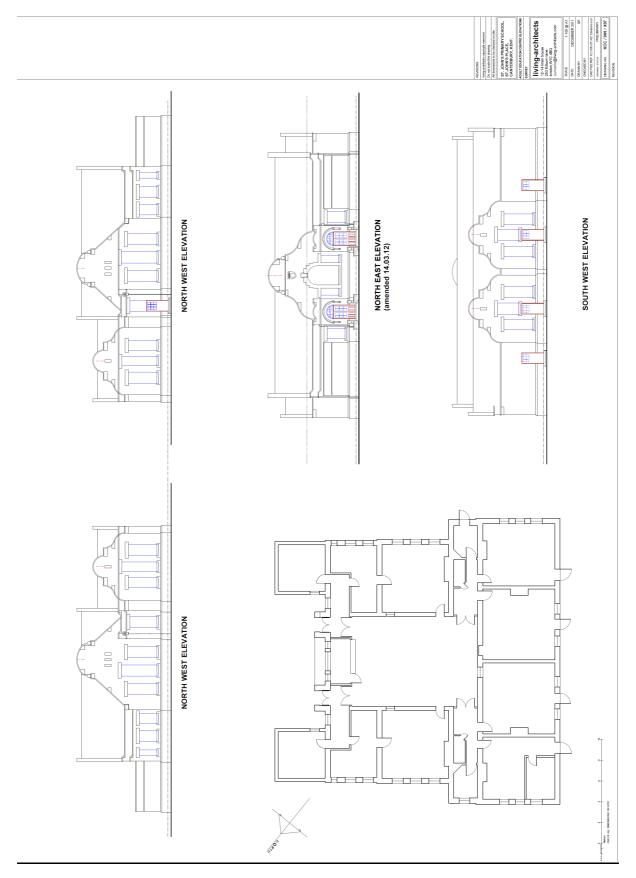
Partial demolition of AEC, with new 2 storey building within retained façade at St Johns Primary School, Canterbury– CA/12/1681



### **Proposed Site Layout**



### **Existing Elevations of the Adult Education Centre**



### **Existing Elevations of the Primary School Building**



### **Proposed Elevations**



3. The application site is located within the Canterbury City Conservation Area, and is in close proximity to the extents of the old city wall. A number of Listed Buildings are located in the vicinity of the site, including the adjacent St John's Board School building, and the Canterbury City World Heritage Site, which includes Canterbury Cathedral, lies to the south of the application site. The 'buffer zone' around the World Heritage Site runs up to the boundary of the application site, adjacent to the southern elevation of the AEC. To the north east of the application site lies a Scheduled Ancient Monument, and the whole school site is within an Area of Archaeological Protection. A Public Right Of Way runs along the River Stour to the north of the Primary School. A site location plan is attached

### **Background**

- 4. The refurbishment and extension proposed to the previously named Kingsmead School is to facilitate an amalgamation between Kingsmead Primary School and the nearby Diocesan and Payne-Smith Primary School to form the new St John's Primary School. Each of the existing schools are 1FE (240 pupil capacity) with nursery provision. The capacity of the new 2FE St John's Primary would be 420 pupils, with a maximum of 30 children in the nursery (split over 2 sessions). The existing buildings at St John's Primary School are larger than required for its current intake, so the building is currently shared with community services, who occupy a partitioned off area of the first floor. Community Services are being re-located within Canterbury and will no longer occupy part of the school site. It is considered that the proposed development would provide improved facilities compared to those at the existing schools, bringing teaching areas and facilities in line with Building Bulletin 99 Area Guidelines. The development of the school would, the applicant states, provide improved acoustics, natural ventilation and means of emergency escape, and would enable the School to be more efficient in terms of the available teaching resources and running costs on the single site. The development would also bring the existing building up to current accessibility standards.
- 5. A previous application, reference number KCC/CA/0133/2012, for a similar development was submitted in April 2012, and was withdrawn by the applicant in September 2012. That application was withdrawn so that the scheme could be amended slightly, mainly to the link between the proposed new build and the existing Primary School. The link as previously proposed was two storey but a water main was found which could not be built over. The link therefore was amended to first floor only. In addition, common newts were translocated from the existing stagnant and unused swimming pool to an agreed receptor site.
- 6. Minor amendments to the design of the building and the external works have been made in an effort to address concerns raised regarding the protection of historic walls, and the relationship between the existing facades and the new build element of the development proposed. It is the revised scheme that will be discussed and highlighted throughout this report. It should also be noted that the applicant has submitted a Conservation Area Consent application to Canterbury City Council for the demolition works proposed.

#### **Proposal**

7. Kent County Council Property Group is seeking planning permission for the partial demolition of the Adult Education Centre (AEC), and the erection of a new two storey building within the retained façade of the AEC. An upper storey link to the existing

Primary School building is also proposed, in addition to associated landscaping and external works. It is also proposed to demolish part of a toilet block to the rear elevation of the Primary School building. The existing Primary School building has a gross internal floor area of 1629 square metres. The area requirements for a 2FE Primary School plus nursery are such that a further 800 to 900 square metres of accommodation are required on site.

- 8. Due to the constraints of the site, including limited playground space, historical designations and resultant design considerations, and adjoining residential properties, the applicant considers that the redevelopment of the existing AEC building is the most suitable way of providing the additional floor space required. In addition, the AEC building has suffered from years of vacancy and neglect and is now in extremely poor condition. It is considered that should the AEC not be included in the development proposals at this time, it would fall into further disrepair as future funds would not be available for refurbishment. The applicant advises that various options were considered for the redevelopment of the AEC, including total demolition and rebuild, but it was concluded that the majority of the facades would be retained, and a new build constructed within the retained walls.
- 9. The main entrance façade of the AEC building would be retained in its entirety, and approximately 60% of the two flanking facades would also be retained. The rear elevation would be completely demolished, as would the interior of the building, behind the facades to be retained. Within the retained facades of the AEC a new two storey building is proposed, which is modern in design to contrast rather than mimic the Victorian architecture on the site. An upper storey glass link would connect the new building to the existing Primary School. At ground floor level, all new walls would be constructed of stock brickwork to match the retained facades, whereas the upper storey, which would be visible behind the retained gables, would be of timber frame construction with a mixture of through colour render and glazing. The glazed link would extend from the upper storey of the new building, and turn 90 degrees to form a new contempory glazed school entrance along the south east façade of the Primary School building. A lift would also be incorporated into the new glazed entrance to allow DDA compliant access to both storeys. The proposed building would have a flat roof, and would be lower in height than the highest point of the dutch gables to be retained.
- 10. The detail in connecting the new building to the retained facades is very important in making sure the building reads as one whilst maintaining the distinction between old and new. The rendered elements of the new build would be set back from the retained gables, to create a shadow gap. The shadow gap would be emphasised further by aluminium capping, to be finished in dark grey.
- 11. The proposed new building would accommodate additional teaching facilities and a new school hall and dining facility. The introduction of a school hall capable of accommodating the whole school for assemblies also has potential for use by the wider community, and would enable the School to offer a greater range of extra curricular activities. The rear elevation of the new build would be entirely new, of brick and render construction, but would be built further to the north east than the rear elevation of the existing AEC as the addition of a second storey has enabled the footprint of the building to be reduced. To the rear of the building, an existing disused swimming pool is to be removed and the over grown garden cleared and landscaped to provide useable outside play/amenity space. Historic flint walls which run through this area are to be retained.
- 12. Existing timber fencing to the south of the Primary School building is to be removed and replaced with 2.0 metre high hooped top fencing. The fencing would also extend to the

front of the new building, and enclose the new link and main school entrance, to create a secure site boundary. 1.8 metre boarded fencing is also proposed to the south of the new building, to secure the landscaped amenity space. Existing historic elements of boundary walls would be retained and protected throughout the works.

- 13. At the moment, the Primary School building and the AEC are secured separately, and a footway runs between the two, linking St John's Place to the St Radigund's Car Park and the City Centre beyond. This route is not a Public Right of Way, but a through route used by members of the Public. It is proposed to remove this through route, and secure both buildings within one secure boundary line.
- 14. The existing access routes to the school site are somewhat random due to the nature of the surrounding roads, and the school currently lacks a focal entrance point. The existing school frontage faces the St Radigund's Car Park, but is separated from it by outbuildings and the leased car parking area currently used for staff parking. Although the proposed main entrance would face St John's Place, it is proposed that vehicular access would remain largely as it is at present. The main pedestrian access points to the school would remain unchanged, via St John's Place and St Radigunds. It is however, proposed to provide 3 car parking spaces in a new parking area immediately to the left as one enters the school site from St John's Place.

The application is accompanied by a Design and Access Statement, Heritage Statement, Ecological Scoping Report, Reptile & Bat Survey Report, Amphibian Assessment, Level 1 Flood Risk Assessment, Desk Based Archaeological Assessment, Arboricultural Assessment, School Travel Plan and Transport Statement.

### **Planning Policy**

- 15. The following Guidance/Statements Development Plan Policies summarised below are relevant to the consideration of the application:
- (i) The National Planning Policy Framework (NPPF)

The NPPF is planning policy guidance and a material consideration for the determination of planning applications. It does not change the statutory status of the development plan which remains the starting point for decision making. The NPPF replaces the majority of the Planning Policy Guidance Notes (PPGs) and Planning Policy Statements (PPSs), although PPS10 relating to Planning for Sustainable Waste Management is currently retained.

The NPPF contains a presumption in favour of sustainable development. The new Framework refers to the UK Sustainable Development Strategy Securing the Future which sets out 5 guiding principles for sustainable development: living within the planet's environmental limits; ensuring a strong, healthy and just society, achieving a sustainable economy; promoting good governance and using sound science responsibly. In terms of the planning system, the NPPF identifies that there are 3 dimensions to sustainable development which create 3 overarching roles in the planning system -- economic, social and environmental. These roles are mutually dependent. Within the over-arching roles there are 12 core principles that planning should achieve. These can be summarised as:

1. be genuinely plan-led;

- 2. a creative exercise in finding ways to enhance and improve the places people live their lives;
- 3. proactively drive and support sustainable economic development;
- 4. secure high quality design and a good standard of amenity;
- 5. take account of the different roles and character of different areas, including protecting Green Belts, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities;
- support the transition to a low carbon future, taking account of flood risk and costal change and encourage the reuse of existing resources and the development of renewable energy;
- 7. contribute to conserving and enhancing the natural environment and reducing pollution;
- 8. encourage the effective use of land by reusing brownfield land, providing that it is not of high environmental value:
- 9. promote mixed use developments;
- 10. conserve heritage assets;
- 11. manage patterns of growth to make fullest use of public transport, walking and cycling and focus significant development in locations which can be made sustainable;
- 12. take account of strategies to improve health, social and cultural well being, and deliver sufficient community and cultural facilities and services to meet local needs.
  - <u>In terms of delivering sustainable development in relation to this development</u> proposal, the following NPPF guidance is particularly relevant:

The NPPF sets out the Government's objectives for promoting sustainable growth and prosperity, whilst planning for strong vibrant and healthy communities. Good design is identified as important for sustainable development, with the planning system expected to promote good design for all development. As part of the Governmen'ts objective to promote healthy and sustainable communities, paragraph 72 of the NPPF states that Local Planning Authorities should give great weight to the need to create, expand or alter schools, ensuring that a sufficient choice of school places is available to meet the demand of existing and new communities. The Framework also requires that local planning authorities should look for solutions rather than problems. It states that those determining applications should seek to approve applications for sustainable development where possible. The NPPF also sets out planning's important role in tackling climate change, protecting the natural environment, protecting and enhancing biodiversity, limiting noise and light pollution, and protecting the historic environment. Section 7 of the NPPF (in particular paragraphs 56-64) sets out guidance to achieve good design, and section 12 sets out guidance with regard to conserving and enhancing the historic environment (in particular paragraphs 128 – 140).

(ii) **Policy Statement – Planning for Schools Development** (15 August 2011) which sets out the Government's commitment to support the development of state-funded schools and their delivery through the planning system.

### (iii) The adopted **South East Plan 2009**:

**Policy CC1** Seeks to achieve and maintain sustainable development in the region.

**Policy CC4** Refers to sustainable design and construction.

**Policy CC6** Refers to sustainable communities and character of the environment.

**Policy T4** Refers to parking standards and the provision of adequate secure cycle parking.

**Policy NRM2** Water quality will be maintained and enhanced through avoiding adverse effects of development on the water environment.

**Policy NRM4** Confirms that the sequential approach to development in flood risk areas set out in PPS25 will be followed.

**Policy NRM5** Requires Local Planning Authorities and other bodies to avoid a net loss of biodiversity, and actively pursue opportunities to achieve a net gain across the region.

**Policy BE1** Local Authorities and their partners will use opportunities associated with new development to help provide significant improvements to the built environment.

**Policy BE6** Management of the historic environment.

Policy S3 States that, local planning authorities, taking into account demographic projections, should work with partners to ensure the adequate provision of pre–school, school and community learning facilities.

**Policy S6** Encourages the mixed use of community facilities, and requires community facilities to be located and designed appropriately.

**Policy W2** Encourages sustainable design, construction and demolition.

#### Important note regarding the South East Plan:

Members will already be aware of the relevant South East Plan policy considerations in relation to the proposed development, in that The Plan was revoked and later reinstated pending the enactment of the Localism Bill. Members will also be aware that they have to have regard to the policies in the SEP and the Government's intention to abolish the Regional Spatial Strategies (RSS) as material considerations. However the weight to be accorded is a matter for the decision makers. Members should also note that the Localism Bill has now been enacted; however the SEP remains in effect until such time as the Government complete the formal process of revoking the Plan.

- (iv) The adopted (2006) Canterbury District Local Plan First Review:
  - **Policy BE1** The City Council will expect proposals of high quality design which respond to the objectives of sustainable development.
  - Policy BE3 Design statements and/or Development Briefs shall be submitted with planning applications setting out the principles used in the scheme to relate the development within and to its context. This will apply to all planning applications, where the development is visually significant or is significant to its neighbours.
  - Policy BE4 The City Council will regard the status of the World Heritage Site (WHS) as a key material consideration in determining planning applications, and applications for listed building consent that would affect the WHS or its setting.
  - Policy BE7- Development within, affecting the setting, or views into and out of a Conservation Area should preserve or enhance all features that contribute positively to the areas character or appearance.
  - Policy BE8 The demolition of buildings or other structures within a conservation area will not be permitted unless their removal and/or replacement will preserve or enhance the character or appearance of the conservation area.
  - **Policy BE10** The historic landscape, including archaeological features, will be preserved and enhanced.
  - Policy BE14 Development which would adversely affect the site or setting of a Scheduled Ancient Monument, or other nationally important archaeological sites, will not be permitted.
  - **Policy BE15** Prior to determination of applications for development that may affect a known or potential site of archaeological interest, prospective developers will be required to make provision for an appropriate archaeological evaluation.
  - Policy NE1 Where development proposals are being considered for a site known, or likely to have, protected species, or species identified in national or Kent Biodiversity Action Plans, developers will be expected to carry out a survey and present proposals for mitigation.
  - **Policy TC13** A Regeneration Zone is designated for the redevelopment of the Kingsmead and Riverside Area. Development appropriate for this area includes a mix of cultural, leisure and recreation facilities, housing, business, open space and education.
  - **Policy C9** The City Council will apply Kent County Council's adopted Vehicle Parking Standards to development proposals.
  - Policy C11- Proposals for new buildings or uses for local communities to provide social infrastructure will be encouraged and granted planning

permission on the basis that any new building is appropriately designed and located, and highway safety would not be prejudiced.

#### **Consultations**

16. Canterbury City Council raises no objection to the application, and considers that the application accords with the aims of Policies BE1, BE7 and BE8 of the Canterbury District Local Plan, and Policies BE1 and BE6 of the South East Plan. It is recommended that conditions be imposed requiring details of materials, colour of render and the form of glazing (windows and doors) to be submitted to the County Planning Authority for approval. Canterbury City Council would encourage the applicant to look again at the detailing of the proposed south west elevation to potentially create more vertical emphasis, rather than horizontal. The City Council consider that all other matters can be dealt with by the relevant Kent County Council advisors and the County Planning Applications Group, being the appropriate determining Authority.

#### The Divisional Transportation Manager comments as follows:

"The proposal would lead to the amalgamation of two established schools which are located in relatively close proximity to one another. The proposals would lead to a small increase in roll across the two, however, in the first instance this is not considered to represent a material increase. This application has been subject to pre application discussion during which numerous matters and potential improvements were discussed, particularly relating to pedestrian linkage at the school.

The school is located in a central location. The existing school inevitably generates local congestion at times of pick up and drop off, although I do note that the majority of parents choose to pick up and drop off via local car parks, which are situated a short walk from the school grounds. I expect traffic activity to increase as a result of the amalgamation. However, this would largely represent a redistribution of trips in the locality, as the majority of these would be transferred from the existing Diocesan & Payne Smith school site.

Given the location of the school, it is not strictly necessary to provide dedicated pick up and drop off facilities. In terms of pedestrian access, links to the school are not ideal with particular reference to the existing access via St John's Place. Ideally this should be upgraded to a shared facility, however I am mindful that this would represent a significant engineering task and may be unpopular with local residents. There are further conservation considerations that would increase the complexity of such a scheme. The existing arrangements result in pedestrians using both the footway and carriageway at times of peak demand and this appears to operate without causing any overbearing safety concerns. Whilst improvements to this link would be preferred, the level of engineering required to achieve a shared facility would be out of context with the scale of the development. Therefore, on balance, given that there is no history of overbearing safety concerns in St John's Place, I consider that it would be unreasonable to insist on improvements.

I recommend that a full construction management plan be submitted to and approved by the planning authority prior to commencement of the development. This plan should include measures such as identifying access routes,

construction timing, details of wheel washing facilities, parking for site operatives and associated traffic management.

Subject to this, I do not wish to oppose this application."

**Environment Agency** has no objection to the application, subject to the imposition of conditions requiring the submission of a scheme detailing appropriate flood resistance/resilience measures, a flood evacuation plan, finished floor levels and a scheme for the disposal of surface waters. A condition regarding land contamination is also required. In addition, advice is provided with regard to flood risk, ground water, drainage, and the storage of fuel, oil and chemicals.

The County Council's Biodiversity Officer has no objection to the application subject to the imposition of conditions to ensure that the recommendations and precautionary approaches set out within the submitted Protected Species Reports/Surveys are implemented and adhered to, and that details of ecological/biodiversity enhancement measure are submitted.

**English Heritage** advises that the application should be determined in accordance with national and local policy guidance, and on the basis of the County Council's specialist conservation advice.

The County Council's Archaeological Officer raises no objection subject to conditions requiring the implementation of a programme of archaeological work, and a programme of building recording.

The County Council's Conservation Architect has no adverse comments to make. A condition of consent is required to ensure correct flashing details between the new build elements and the existing stone copings, and conditions should be imposed requiring the submission of details of external materials, including cladding, bricks, roofing and wondow/doors. This would ensure an appropriate quality of construction.

### Public Rights of Way Officer comments as follows:

"I note the comments regarding the footpath from St Radigund's Place, passed the AEC building and through to St John's Place, and the intension to remove access at this location. Although the route is not a public right of way on the Definitive Map, this is not conclusive and paths can be added through the claims process. If the path cannot be accommodated through the site, I would advise the applicant that if access is removed, a claim may be made to get the footpath recorded and added to the definitive map."

Footpath CC72 runs immediately adjacent to the site, along the bank of the River Stour. General informatives are provided with regard to works that cannot be undertaken on or immediately adjacent to the footpath.

#### **Local Member**

17. The local County Member, Mr Graham Gibbons, and the County Member for the adjoining ward, Mr Martin Wye, were notified of the application on the 21 September 2012.

Martin Vye fully supports the application.

#### **Publicity**

18. The application was publicised by an advertisement in a local newspaper, the posting of 4 site notices and the individual notification of 99 neighbouring residential properties. In addition, three local conservation groups/residents associations were notified of the application, The Canterbury Conservation Advisory Committee, St Peter's Residents Association and The Canterbury Society.

### Representations

19. To date, I have received 5 letters of representation from the Canterbury Conservation Advisory Committee, St Peter's Residents Association, and a local resident. A summary of the main issues raised/points made is set out below:

### Design/Conservation/Heritage

- The former AEC is a beautifully detailed building using quality materials, local red brick and peg roof tiles, with stone dressings to attractive Dutch gables and entrance porches. The overall design has much character and as such is an 'ornament' to the Conservation Area;
- Appalled to realise that it is proposed to demolish most of the AEC, leaving only three external walls and three of the seven Dutch gables;
- Retention of the facades, and construction of a modern 'box' within it will appear 'ridiculous' and would rob the building of its existing coherence;
- The proposed building, with white render and a flat roof, modern in style, would be completely out of character with the Conservation Area, and would be intrusive in the local townscape:
- The design is inappropriate for the centre of Canterbury;
- Object to the demolition of the ancient flint boundary walls;
- The wall and entrance gateway at the end of St John's Place help create a sense of enclosure and should be retained:
- There are important views of the Cathedral from the site, especially if standing in the coach/car park to the east of the school. It is important to recognise the World Heritage Site and the arrival of visitors to the City. Views of the Cathedral should not be compromised;
- The pitched roof of the AEC building is to be replaced with an expansive flat roof; whilst no higher than the existing it would be clad in smooth white render and floor to ceiling glazing, detracting from the traditional roofscape setting to the Cathedral;
- The new flat roofed lift building will be visually prominent and would restrict the width of the view of the Cathedral;
- Canterbury City Council policy is clear that views of the Cathedral should be protected and flat roofs are unacceptable in conservation areas;
- The development would not preserve or enhance the character or appearance of the Conservation Area;
- The main school building and the AEC form an important visual focus at the end of St John's Place, and compliment the adjacent listed St John's Board School;
- Consent is unlikely to be granted for the demolition of a building or structure that
  makes a positive contribution to the Conservation Area, as supported by Policy BE8
  of the Canterbury Local Plan;
- There is a strong case for the Primary School building and the AEC to be locally listed due to their character and architectural interest;
- The proposal is contrary to English Heritage Conservation Area Practice;

 Other options for the development/expansion of the site should be considered, including the erection of a new building to the northeast of the existing school building, on the playground, or development of the St John's Board School building;

### Highways/Access

- The proposed entrance at the end of St John's Place is impractical due to the narrowness of the road;
- Strong objection is raised to the proposal to block/close the current pedestrian route between the end of St Radigund's and St John's Place. The route is well used and invaluable to local residents as a shortcut to the riverside walk and into Northgate. The route has been freely available ever since the school was built in 1903 and it should not be stopped up;

#### **Discussion**

#### Introduction

- 20. This application seeks planning permission for the partial demolition of the building known as the Adult Education Centre (AEC), and the erection of a new 2 storey building within the retained façade of the AEC and a new link building to the existing Primary School. Minor demolition of part of a WC on the rear elevation of the Primary School, and associated landscaping and external works are also proposed. In considering this proposal regard must be had to the Development Plan Policies referred to in paragraph (15) above. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise. Therefore, this proposal needs to be considered in the context of the Development Plan Policies, Government Guidance and other material planning considerations arising from consultation and publicity. Issues of particular relevance include design, conservation and heritage matters, and general access and highway issues, including the proposed removal of a footway through the site.
- 21. In this case the key determining factors, in my view, are the impact upon heritage interests and the policy support for the development of schools to ensure that there is sufficient provision to meet growing demand, increase choice and raise educational standards, subject to being satisfied on amenity and other material considerations. In the Governments view the creation and development of schools is strongly in the national interest and planning authorities should support this objective, in a manner consistent with their statutory obligations. In considering proposals for the creation, expansion and alteration of schools, the Government considers that there is a strong presumption in favour of state funded schools, as expressed in the National Planning Policy Framework. Planning Authorities should give full and thorough consideration to the importance of enabling such development, attaching significant weight to the need to establish and develop state funded schools, and making full use of their planning powers to support such development, only imposing conditions that are absolutely necessary and that meet the tests set out in Circular 11/95.

### The principle of building on the site of the AEC

22. Before considering the merits of the proposal, I consider it important to first assess alternative options for the development of the site. Representations received suggest that alternative options should be considered, including the redevelopment of the St John's Board School and the provision of a new building elsewhere on the school site.

The need for the amalgamation of the two schools has not been questioned, but the resultant impact of this is the requirement for additional accommodation on site. It is important to note that the whole of the application site is within the Canterbury City Conservation Area, adjacent to the buffer around the World Heritage Site, and within an Area of Archaeological Protection. A number of Listed Buildings also surround the site, including the St Johns Board School building, and a Scheduled Ancient Monument lies to the north east of the site.

- 23. The applicant advises that the location of a new building on site is to a large degree predetermined by the nature and location of the existing buildings on site, and the proximity of neighbouring development/properties. The applicant further advises that the following factors influenced the decision to develop in the location proposed:
  - a. The site falls within a Conservation Area and all demolition needs to be strongly justified;
  - b. Avoiding development which would have a detrimental impact on the existing School or the limited playground space (e.g. obscuring views of and from the school, restricting circulation and the flow of pupils around the site);
  - c. Avoiding a reduction in playground space;
  - d. Avoiding development which would have a detrimental impact on adjoining properties notably the residential developments to the south and east of the site;
  - e. Encouraging development which enhances the existing buildings on site;
  - f. Providing a clearer signal of the school entrance;
  - g. Segregating pedestrian and vehicular access to the school as far as possible;
  - h. Reducing the amount of undeveloped land to be used, and hence minimise the risk of an archaeological find;
  - i. Restricting development to existing developed areas to minimise potential mitigation works detailed in the Flood Risk Assessment.
- 24. In light of the above, I consider that the applicant has assessed the possibility of introducing a new building onto the site, but has had to discount this for various reasons. Most notably, a new build would result in a significant loss of playground space (which is already limited), could result in a substantial amount of archaeological work, and would need to include mitigation with regard to flood risk. In addition, a new build element within the playground could have a detrimental impact on the existing school in terms of restricting views to and from the school, restricting circulation and impacting on the flow of pupils around the site. It should also be noted, that a new build on the playground could trigger the need to demolish the AEC building to compensate for the loss of playground space. I find it unlikely that such justification for total demolition within a conservation area would meet with approval, which would leave the school with an under provision of outdoor play space. Considering the information provided by the applicant, I agree with the conclusion made in that a new building on the playground would not be appropriate or acceptable. This therefore leaves one option, to develop an existing building on site.
- 25. It has been suggested by local community/conservation groups that the St John's Board School building should be developed to provide the additional accommodation provided. However, this building is listed, and the necessary internal and external alterations would require listed building consent. In addition, this building is separated from the existing school by a car parking area and an existing HORSA hut building, which would make the linking of these two buildings unviable due to the distance involved. The amalgamated school needs to be unified and cohesive, and the development of the St John's Board building would not facilitate this. I therefore conclude that the development of that building would not provide the accommodation required by the applicant in this case.

26. Having considered the above, I consider the development of the AEC building to be the only viable option on this restricted site. In addition, it should be noted that the AEC building is in a poor state of repair as it has suffered from years of neglect. Unless the AEC building is refurbished/developed in some way as part of this application, further funds for future maintenance and/or refurbishment would almost certainly not be available. The building would, therefore, continue to deteriorate.

#### Development options for the AEC building

- 27. Having concluded that the development of the AEC building/site is the optimum location for the additional accommodation required on site, the options for the development of this area must be considered and assessed. The applicant advises that three options were considered for the development of the AEC:
  - Refurbish and extend the existing AEC, retaining most of the building whilst extending the building to the south to provide the additional accommodation required;
  - Complete demolition of the AEC building and construction of a new build development;
  - Retention of the majority of the AEC facades, and construction of a new build scheme within the retained walls.

The general principle behind all three options was to minimise the extent of significant works to the existing Primary School building. Whilst not listed, it is considered to be locally important and is subject to significant interest from local Conservation Officers and Groups. Works to the Primary School building would also prove costly and disruptive to pupils and the local community.

- 28. The applicant advises that the existing AEC building covers an area of approximately 560 square metres, but does not lend itself to the school accommodation required. It is a single storey building with a very high roof and internal spaces, the windows are too high to provide views for children, internal spaces are not suitable for teaching, and the internal walls are mainly load bearing, making alterations costly and difficult. The first option, to refurbish and extend the AEC, retaining most of the building, would be the favourable option in Conservation terms. However, the building is very high for a single storey, but too low to convert to two storeys due to the pitched roof. An extension to the building would be required which, to provide the additional space needed, would be nearly as big as the AEC itself. Circulation within a large single storey building would be difficult and inefficient, and a large single storey extension would involve significant land take, and the removal of historic boundary walls. In light of this reasoning, I do not consider this option to be viable in this instance.
- 29. The second option, to completely demolish the AEC, would have the significant advantage of being able to plan and layout a new building which would be fit for purpose and not constrained by the existing building. A new design would have the opportunity to reflect the newly formed St John's Primary School, and an efficient single or two storey layout would reduce construction costs. However, total demolition of the AEC would require strong justification due to its location within the Canterbury City Conservation Area, and a replacement building would also be required to enhance the appearance of the Conservation Area above and beyond the existing AEC. The AEC was built at the same time as the Primary School and the exterior of the buildings share many common design features which unify the buildings. In this instance, I consider that total demolition and replacement would be hard to justify, and would detract from the unity of the site and the character and appearance of the Conservation Area and the

local townscape as a whole. I therefore do not consider this option to be suitable in this particular case.

- 30. The third option considered by the applicant, and as proposed, retains the majority of three facades of the AEC building with a new build structure contained within the facades. The applicant considers the advantages of this option to be the retention of key features contributing to the Conservation Area, retention of the facades allows for a more modest and economical use of materials within, and demolition of the interior of the building provides a clear open space for freedom of planning and layout. A two storey building also becomes possible, reducing landtake and, in fact, decreasing the footprint of the building compared with that of the original AEC. However, internal demolition would come at a cost, as would propping up and securing the retained facades. There is also a risk that this option would not satisfy either the applicant's, the School, or conservation interests.
- 31. Having concluded that development of the AEC is the most appropriate for the site, and having assessed the three options for the development of the AEC I consider that, on balance, the third option, as proposed by the applicant, is the favourable option in terms of balancing the retention of the building and conservation interests with the space and accommodation requirements of the school. Retaining the facades of the building retains some of the historic integrity of the building and the unity between the existing buildings on site. The new build element allows for well designed and planned spaces to be provided which are fit for purpose and meet the additional accommodation requirements of the School, whilst actually reducing the footprint of the building when compared to the existing. On balance, I agree with the applicant and consider this to be the most appropriate and suitable option in this case. However, the implications of the development as submitted need to be assessed in terms of design, and impact on conservation and the historic environment.

### Design, conservation and heritage implications

- 32. As outlined in paragraphs 9 to 11 of this report, the applicant is proposing to retain the whole of the entrance façade to the AEC building, and 60% of the two flanking facades, retaining 3 of the Dutch gables. The rest of the building, including the rear elevation, would be completely demolished and a new two storey building would be constructed within the retained facades. The proposed new build would be modern in design, and constructed of brick work at ground floor level, to match the retained facades, and through colour render and floor to ceiling glazing at the upper storey level. A two storey glazed entrance building is proposed to run parallel to the south east elevation of the Primary School building, turning 90 degrees from the AEC, creating a new focal entrance for the school. An upper storey glazed link is proposed from the entrance building to the existing Primary School. The detail in connecting the new building to the retained facades is very important in making sure the building reads as one, whilst maintaining the distinction between the old and new. The rendered elements of the new build would be recessed back from the retained gables to create a shadow gap, which would be emphasised further by dark grey aluminium capping. The glazing element would sit forward of the render, on top of the retained brick at ground floor level. The rear elevation of the new building would be entirely new build, constructed of brick and render.
- 33. Due to the constraints of the site, the site is protected by specific Development Plan Policies with regard to conservation and heritage, in additional to general design Policies. The site is in a sensitive location and the design of the development needs to be assessed against Policy. Although the City Council, the County Council's

Conservation Architect and English Heritage have raised no objection to the application, local objection has been raised to the design, and further impacts upon the City townscape and the views of the Cathedral. These matters will be discussed below. It should be noted that objection has also been raised to the demolition of the AEC building, but this matter is determined by Canterbury City Council under a Conservation Area Consent. My understanding is that the City Council, which has no objection to this application, will approve the Conservation Area Consent should Members be minded to agree with the recommendation in this report, and planning permission is granted. The City Council has not approved the Conservation Area Consent as yet since they would not wish to permit demolition unless the AEC site is redeveloped as proposed.

- 34. As outlined in paragraph 18 of this report, the main points of objection raised relate to design, impact on views of the Cathedral, and general heritage matters. First, I consider it important to note that the proposed development would retain most of the facades of the existing building, maintaining important design features which link the existing buildings on site. I consider this to be a positive feature of the development, which would aid in maintaining the character of the site. However, the new element of the development is of a modern design, to contrast and complement, rather than mimic, the existing buildings on site. The flat roof of the building proposed would be no higher than the existing pitched roof of the AEC and, in fact, the Dutch gables that are retained would extend above the proposed roof line. Local representations consider the design to be inappropriate within the City of Canterbury, and state that the construction of a modern box, within retained facades, would appear 'ridiculous'. However, as outlined above, additional accommodation is required on site and various options have been considered, and the approach as proposed is considered to be the most appropriate and suitable. Moreover, to rebuild the centre of the AEC, behind the retained walls, using a traditional approach, would be visually incongruous and could detract from the character and appearance of the Conservation Area. A traditional construction would also require a pitched roof which, on a two storey building, would significantly increase the height of the building. This would have a significantly worse impact on the local townscape and views of the Cathedral than the flat roof proposed.
- 35. The modern design solution, I consider, creates a new identity for the site, linking existing buildings, both physically and in appearance. The materials proposed are unobtrusive and typical of other modern developments within the City Centre, including the Marlowe Theatre and Whitefriars Shopping Centre. The glazing would allow views through it in places, such as the glazed link, enabling views of the building behind, and the render would offer a crisp and clean finish, contrasting with existing brick and stonework. The existing AEC is in a poor state of repair and does little to enhance the character and appearance of the Canterbury City Conservation Area, or the setting of adjacent Listed Buildings. The retention of the facades of the AEC building would maintain the existing character of the building, whereas the new build element would add a modern design solution and provide the facilities required by a modern day Primary School. The retained elements of the AEC would be maintained and repaired, improving their appearance over their existing state of deterioration. This particular approach has been successfully followed on similar redevelopments with heritage interests, including the recently remodelled Gravesend Library.
- 36. As previously stated, the City Council raises no objection to this application. It is considered that the development accords with the principles of Development Plan Policies, including Local Plan Policies BE1, BE7 and BE8, and Policies BE1 and BE8 of the South East Plan. However, the City Council did suggest that the applicant look again at the design of the rear elevation of the building, to create more vertical emphasis, rather than horizontal. However, the applicant advises that the window size

and layout has been led by the need to maximise natural daylight and ventilation into the classrooms within the building, and that this is the only elevation of the building that allows that opportunity. The design also incorporates horizontal louvres, acting as brise soleil, but these are an essential component on a south facing elevation. This elevation of the building is well screened from outside of the site, and is set against existing planting and boundary walls. Only those within the new outside recreation area (on the site of existing swimming pool) would see this view head on. The oblique view afforded from St Radigund's car park does emphasise the vertical by means of mullions within the fenestration. In light of this, I see no overriding reason to amend the design of the rear elevation.

- 37. Having considered the views of the City Council, English Heritage and the County Council's Conservation Architect, and assessed the proposal against the relevant principles of Development Plan Policy, I see no reason for the refusal of the application on design grounds. I do not consider that the development would detract from the character and appearance of the Canterbury City Conservation Area, or significantly adversely affect the setting of nearby Listed Buildings. However, as requested by the City Council and the County Council's Conservation Architect, conditions of consent should be imposed to require the submission of details of materials, colour of the render, form of glazing, roofing, and windows and doors. In addition, I consider that detailed drawings of the specific junctions between the retained facades and the new build elements, especially behind the gables, should be submitted for approval. Therefore, should members be minded to permitted, conditions of consent would be imposed as outlined above.
- 38. However, although I accept the design in terms of impact upon the character and appearance of the Canterbury City Conservation Area, and the setting of Listed Buildings, objection has also been raised on the grounds of the development adversely affecting views of Canterbury Cathedral. As outlined in paragraph 3 of this report, the Canterbury City World Heritage Site 'buffer zone' runs up to the boundary of the application site, adjacent to the southern elevation of the AEC. For the avoidance of doubt, the application site is not within the buffer zone. Views of the Cathedral from within the School site are limited, and it cannot be seen clearly from the front of the AEC or from the area proposed to be developed. However, views of the Cathedral can be afforded from the adjacent main Canterbury coach park. This is an arrival point for many tourists visiting the City, and views of the Cathedral from this car park, although limited and obscured in places, are important.
- 39. The applicant has looked at the views from the coach park, and has prepared a photomontage of 'before and after'. Although the development would alter the foreground of views of the Cathedral, I do not consider that the views of the Cathedral would be obscured or unduly impaired. It should be noted the views of the Cathedral from the Coach Park are limited, especially when leaves are on the trees, and that all these views have built development, albeit historic or modern, in the foreground. Moreover, the view of the main tower would not be affected in any way, and only a small part of the roof could be obscured by the proposed development when viewed from a specific point. Although I accept that views of the Cathedral would change as a result of this modern glass and render development in the foreground, I do not consider that the development would obscure or significantly detract from the views currently afforded. I therefore see no reason to refuse the application on this ground, and do not consider that the development would affect the World Heritage Site or its buffer zone.

#### Landscaping

- 40. As outlined in paragraphs 11 & 12 of this report, to the rear of the proposed building lies an existing swimming pool which is to be removed, and an overgrown garden which it is proposed to clear. This area would then be landscaped to provide a useable outside play/amenity space. Local objectors have raised concern regarding the removal of historic flint boundary walls in this area of the site. The applicant has confirmed that the walls are to be retained within this amenity space, and would be protected from development and future use of the site. In addition, existing brick boundary walls and brick piers at the St John's Place entrance to the site are to be retained. Retention of these walls is welcomed, and would be secured by condition should be permission be granted.
- 41. Existing timber fencing to the south of the Primary School building is to be removed and replaced with 2.0 metre high hooped top fencing. The proposed fencing would also extend to the front of the new building, and enclose the new link and school entrance, to create a secure site boundary. 1.8 metre boarded fencing is also proposed to the south of the new building, to secure and enclose the landscaped amenity space. I consider that the fencing types proposed are acceptable when taking into account the sites sensitive location, but further details should be submitted should permission be granted so that detailed specification and colour finishes can be confirmed. In addition, should Members be minded to permit, I also consider that a scheme of landscaping should be submitted, to include details of proposed hard and soft landscaping. Subject to the imposition of these conditions, I consider that the development is acceptable in terms of landscaping and, if anything, has the potential to improve the appearance of existing derelict/overgrown areas of the site

### **Archaeology**

42. As previously stated, the whole of the application site is within an Area of Archaeological Protection. This designation is one of the reasons why developing upon the existing footprint of the AEC is the most appropriate in this case, as archaeological remains are less likely to be disturbed. However, given that ground works will be required, the County Archaeologist has concluded that in order to secure the appropriate level of evaluation and mitigation of archaeological potential at the site, conditions of consent be imposed. It is requested that no development takes place until the applicant has secured and implemented a programme of archaeological work and a programme of building recording. The works shall be in accordance with written specifications which must be approved by the County Planning Authority prior to the commencement of development. Therefore, subject to the imposition of the required conditions, I do not consider that this proposal would have a detrimental impact on archaeological remains.

### Access, Public Right of Way, and through route

43. As outlined in paragraphs 13 & 14 of this report, access to the site is to remain largely as existing, with vehicular access via Duck Lane/St Radigunds, and pedestrian access via here and St John's Place. It is also proposed to provide 3 designated disabled car parking spaces in a new parking area immediately to the left as you enter the school site from St John's Place. Access and Highway matters have not generated any local objection, and Kent County Council Highways and Transportation have not raised objection to this application. As such I see no reason to refuse the application on highway grounds

- 44. A Public Right of Way runs along the River Stour, to the northwest of the site. It is not proposed to affect this PROW as part of this development, nor would the development be visually prominent from the route. The County Council's Public Rights of Way Officer has no objection to the application but provides general informatives with regard to works that cannot be undertaken on or immediately adjacent to the footpath. Should permission be granted, I consider it appropriate to add an informative to cover these matters. Subject to this, I am satisfied that the proposed development would not adversely affect the Public Right of Way.
- 45. Although not a Public Right of Way, as explained in paragraph 13 of this report, a footway runs between the existing Primary School building and the AEC, linking St John's Place to the St Radigund's Car Park and the City Centre beyond. This route is used by members of the public, and is available at the moment as the Primary School and the AEC are secured separately. It is proposed to link these two buildings and enclose them within one secure site, thereby removing this through route. Local objection to the closure of this route has been received, and it is stated by the local community that the route has been freely available ever since the school was built in 1903. However, the route is not a Public Right of Way, and the land is in the ownership of the applicant. Due to security and child protection issues, it is not possible to maintain this route once the AEC is developed for school use. Although I appreciate that this route is well used as a short cut, alternative pedestrian routes are available. The route is not a Public Right of Way and, therefore, does not need to be formally closed/diverted. I cannot therefore refuse the application on this ground.

### Flooding, surface water and land contamination

46. The Environment Agency raises no objection to this application subject to the imposition of conditions regarding flood resilience measures, a flood evacuation plan, finished floor levels, land contamination and a scheme for the disposal of surface water drainage. In addition, advice is provided with regard to flood risk, land contamination, drainage, and the storage of fuel, oil and chemicals, and I consider it appropriate to draw the applicant's attention to this advice, should permission be granted. Therefore, I consider that subject to the imposition of the conditions outlined above, and an informative drawing the applicant's attention to the advice provided, the development could be controlled to ensure that it would not result in unacceptable flood risk and/or pollution levels, in accordance with the principles of Development Plan policy.

#### **Biodiversity**

47. An Ecological Scoping Report, Reptile & Bat Survey Report, and Amphibian Assessment have been submitted in support of this application. The Ecology Surveys conclude that no further survey work is required, but make a number of recommendations which should be followed prior to and during construction works, such as the protection of nesting birds. In addition, ecological/biodiversity enhancement measures should be included within the development proposals. Subject to the imposition of conditions requiring that the recommendations detailed within the Protected Species Surveys be followed, and that details of ecological/biodiversity enhancement measures be submitted, I do not consider that the development would have an adverse impact upon protected species.

#### Construction

48. Given that there are neighbouring residential properties, and a confined nature to the local road network, if planning permission is granted it would, in my view, be appropriate

to impose a condition restricting hours of construction to protect residential amenity. I would suggest that works should be undertaken only between the hours of 0800 and 1800 Monday to Friday and between the hours of 0900 and 1300 on Saturdays, with no operations on Sundays and Bank Holidays. It is also good practice on school sites for contractors to be required under the terms of their contract to manage construction traffic/deliveries to minimise conflict with traffic and pedestrians at the beginning and end of the school day.

- 49. In addition, I consider it appropriate that details of a Construction Management Strategy be submitted for approval prior to the commencement of development. The strategy should include details of the methods and hours of working, location of site compounds and operative/visitors parking, details of site security and safety measures and details of any construction accesses and lorry routing. The provision of such a strategy would also address the conditions required by Kent Highway Services with regards to construction activities. Should permission be granted, a Construction Management Strategy would be required pursuant to condition and the development would thereafter have to be undertaken in accordance with the approved strategy.
- 50. In addition to the above, should permission be granted, conditions of consent would ensure that dust, mud on the local highway network, and other matters associated with construction, would be mitigated as far as reasonably possible so as to minimise disruption to local residents.

#### **Conclusion**

51. In my view, the development would not give rise to any significant material harm and is in accordance with the general aims and objectives of the relevant Development Plan Policies, including those that seek to protect important heritage assets. In addition, the development is in accordance with the principles of the National Planning Policy Framework and the Planning Policy Statement for Schools (2011). I consider that, subject to the imposition of appropriate planning conditions, this proposal would not have a significantly detrimental effect on the historic landscape, including the setting of the Cathedral and the character and appearance of the Canterbury City Conservation Area, or the local highway network. In my view the development is sustainable and there are no material planning considerations that indicate that the conclusion should be made otherwise. However, I recommend that various conditions be placed on any planning permission, including those outlined below.

#### Recommendation

- 52. I RECOMMEND that PLANNING PERMISSION BE GRANTED SUBJECT to conditions, including conditions covering:
  - the standard time limit;
  - the development to be carried out in accordance with the permitted details;
  - the submission of details of all materials to be used externally, including glazing;
  - the submission of details of windows and doors;
  - detailed drawings showing the junctions between the retained facades and the new build elements of the development;
  - details of all external lighting:
  - a scheme of landscaping, including hard surfacing, its implementation and maintenance;
  - measures to protect trees to be retained;

- details of fencing, gates and means of enclosure, including colour finishes;
- retention of historic flint walls, and brick wall and piers to the school entrance via St John's Place;
- no tree removal during the bird breeding season;
- development to accord with the recommendations of the ecological surveys;
- the submission of biodiversity enhancement measures;
- a programme of archaeological works;
- · a programme of building recording;
- submission of a detailed surface water drainage scheme;
- submission of flood resistance/resilience measures;
- submission of a flood evacuation plan;
- submission of finished floor levels;
- land contamination;
- submission of a revised School Travel Plan, its implementation and ongoing review;
- hours of working during construction and demolition to be restricted to between 0800 and 1800 Monday to Friday and between the hours of 0900 and 1300 on Saturdays, with no operations on Sundays and Bank Holidays;
- construction management plan, including access, parking and circulation within the site for contractors and other vehicles related to construction and demolition operations;
- measures to prevent mud and debris being taken onto the public highway.
- 53. I FURTHER RECOMMEND THAT the applicant BE ADVISED of the following informatives:
  - Account should be taken of Environment Agency's advice relating to flood risk, land contamination, drainage, and the storage of fuel, oil and chemicals.
  - Account should be taken of the County Council's Public Rights of Way Officer's general informatives with regard to works that cannot be undertaken on or immediately adjacent to the footpath.

Case officer – Mary Green 01622 221066

Background documents - See section heading