

SECTION D
DEVELOPMENT TO BE CARRIED OUT BY THE COUNTY COUNCIL

Background Documents: 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

Demolition of existing school buildings and replacement with a part two storey, part three storey teaching block with interlinked Sports Hall together with new Multi Use Games Area (MUGA), landscaping and associated ancillary works at Simon Langton Girls' Grammar School, Old Dover Road, Canterbury, Kent CT1 3EW – CA/19/00063 (KCC/CA/0003/2019)

A report by Head of Planning Applications Group to Planning Applications Committee on 15th May 2019.

Application by KCC & Kier Construction (Southern) for demolition of existing school buildings and replacement with a part two storey, part three storey teaching block with interlinked Sports Hall together with new Multi Use Games Area (MUGA), landscaping and associated ancillary works at Simon Langton Girls' Grammar School, Old Dover Road, Canterbury, Kent CT1 3EW – CA/19/00063 (KCC/CA/0003/2019)

Recommendation: Permission be granted subject to conditions.

Local Member: Ida Linfield

Classification: Unrestricted

Site

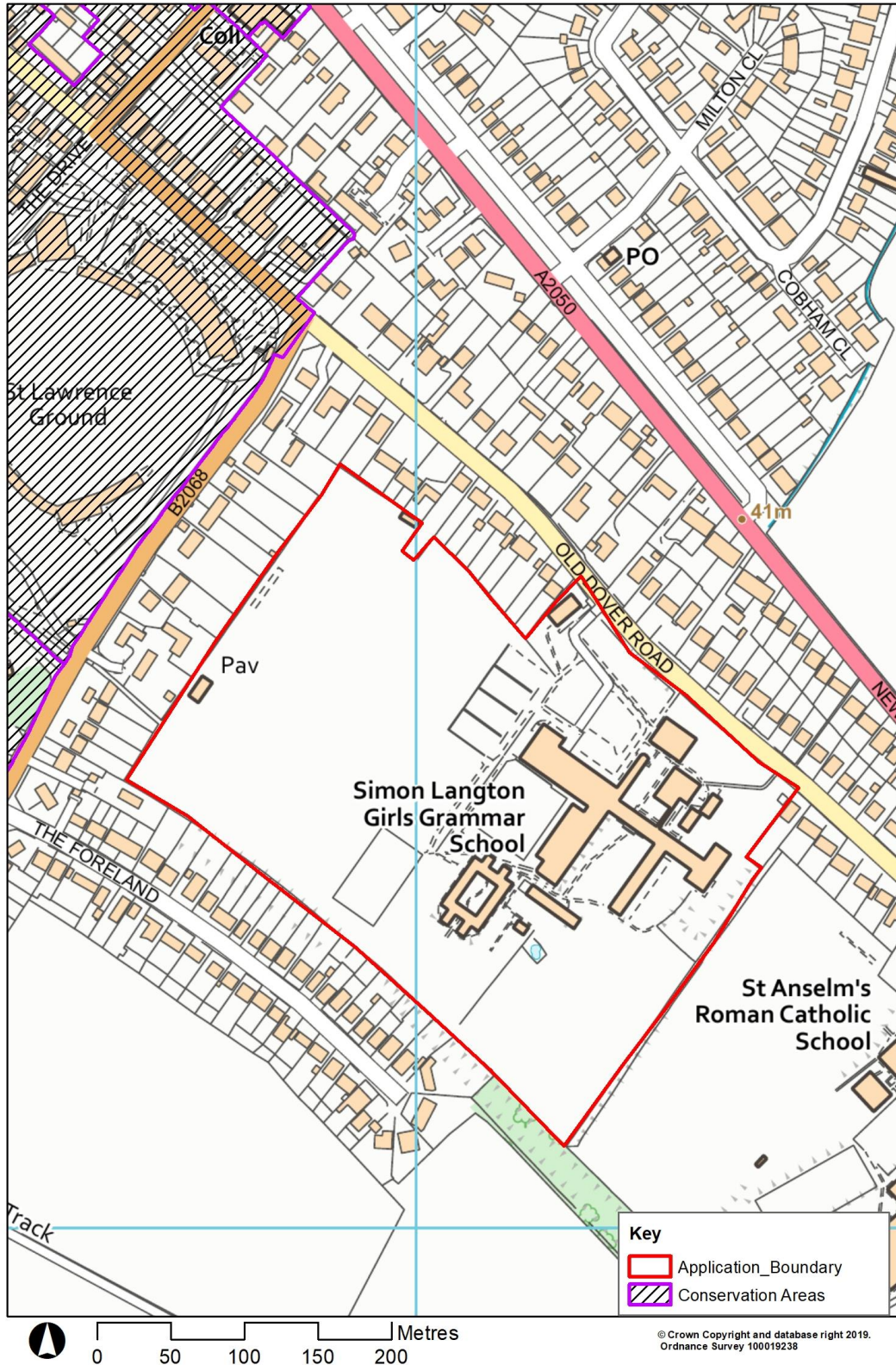
1. Simon Langton is a Girls Grammar school catering for female pupils aged 11-16 years old, and a mixed gender 6th Form. The school sits in a site of approximately 11 hectares, located on the western side of Old Dover Road on the outskirts of Canterbury, approximately 1.5 miles south-east of the city centre. The school consists of 12 teaching blocks, some of which are structurally connected to each other. The original building was built in the 1950's but echoes a 1930's Art Deco design. The school is now a mixture of single, two and three stories in height. There is a distinct change in levels across the site with the school sitting at a much higher level than the road.
2. There is one point of vehicular access to the site from Old Dover Road which is located in the northern corner of the school's frontage onto Old Dover Road. The access and driveway lead to onsite parking areas which provide a total of 114 parking spaces. Three pedestrian points of access are provided from Old Dover Road, one by the vehicle access and the other two along the road frontage – one midway and one near the south-eastern end of the frontage. Both are accessed by steps up from the pavement. There is a further point of access to the school site from Nackington Road, via a narrow track between numbers 19 and 23, which leads directly onto the sports fields. A designated cycle and pedestrian route (covered by Policy T2 of the Local Plan) is provided from this access across part of the playing field to link up to the dismantled railway line to the south of the school site.

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3. Whilst the buildings of the existing school occupy the south-eastern half of the site, the playing fields are located to the north-west. Two Multi Use Games Areas (MUGA'S) are also provided on site, with informal green space and a wooded area in the south-eastern corner of the site.
4. Old Dover Road is a two lane carriageway which has been traffic calmed with speed bumps. There are double yellow lines along long sections of the road in the vicinity of the school, along with designated on-road bus stops. There are also some on-street parking bays on the school side of the road at the eastern end of the frontage, plus some opposite the school access on the other side of the road. Zig-zag 'School Keep Clear' road markings are provided at the access itself.
5. In terms of the wider surrounding area, there are residential properties to the north-east on the opposite side of the road, which are a mixture of sizes and styles, and which are also set at a higher level than the road. The playing field part of the school site is surrounded on all sides by residential properties, fronting Old Dover Road, Nackington Road to the north-west and The Foreland to the south-west. The south-eastern boundary of the site abuts the school grounds of St Anselm's Roman Catholic School, and beyond this is the New Dover Road Park and Ride site. On the other side of Nackington Road is the St Lawrence Kent County Cricket Ground, whose vehicular access lies opposite the minor pedestrian entrance to Simon Langton.

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General Location Plan



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Site Location Plan



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Proposed Site Layout



Legend:

- Local Ownership Boundary
- Site Boundary
- Development Area

Existing Building Retained:

- Existing Building Retained
- Proposed Building
- Concrete Paving
- Vehicular Asphalt
- Pedestrian Asphalt
- Existing Paths
- External Steps
- Site Street (Former) - Proposed Retention
- Amenity Grass
- Proposed Shrubs
- Existing Tree Retention
- Proposed Tree

- Key:**
- 1 Existing Playing Field / Sports Pitches to be retained for this site as part of development.
 - 2 Existing MUGA / Games Court. No works proposed to this facility as part of development.
 - 3 Existing School Building retained.
 - 4 Existing School Pond and Woodland Ecology to be retained as part of the development.
 - 5 Proposed New Sports Hall Block.
 - 6 Proposed New Teaching Block.
 - 7 Existing Site Entrance Gates. Entrance to be retained to improve site access larger delivery vehicles.
 - 8 Existing Car Park.
 - 9 New 2 court MUGA.
 - 10 Proposed new Sub Station and Gas Meter enclosure.

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Proposed Elevations



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Recent Site History

6. The most recent planning history for this site dates from 2012 and relates to the renewal of two temporary mobile classrooms on site. Earlier planning applications relate to small scale additions to the site and are not relevant to the redevelopment application currently submitted.

Background

7. On 1st May 2015 the Minister of State for Schools announced that the Government would fund a further phase of the Priority School Building Programme (PSBP), with a value of around £2 billion. The new phase is a five year programme (operating between 2015-2021) to undertake major rebuilding and refurbishment projects in those schools and sixth form colleges in the very worst condition. PSBP is a condition led, block replacement programme with the aim of replacing time-expired buildings. The programme guidelines as set by the Secretary of State do not allow PSBP to provide facilities other than those required for the School's Published Admissions Number (PAN) in 2014.
8. As part of the programme, 277 schools have been selected to have at least one of their buildings (or blocks) rebuilt or refurbished, and this includes Simon Langton Girls Grammar School. The PSBP has identified Simon Langton as a 'Partial School Project' and a number of time-expired blocks on the site have been highlighted as needing either refurbishment or replacement.

Proposal

9. The application seeks approval for the demolition of three of the existing school buildings. These are the main school building, which was built in 1952 and designed by Sir Hugh Wilson and comprises multiple interlinked wings of up to 3 storey's in height, constructed with reinforced concrete frames and significant portions of the external face being of Crittal style glazing. This main block accommodates Science, Art, ICT and general teaching. The second block is a two-storey steel framed structure with a flat roof and full height Crittal style glazing, added to the site in 1965, which currently accommodates Home Economics, Technology, ICT and the 6th Form Block. The final block to be demolished is single storey in height, clad in timber boarding with aluminium framed windows which was added to the site in 1970. It is currently used for Design and Technology.
10. The demolished blocks will be replaced with a new part 2 and part 3 storey teaching block, with an inter-linked sports hall. The new teaching building would be sited immediately to the rear of the existing school building and would have a rectangular footprint going across the site (as the existing school does) to provide a frontage towards Old Dover Road, and two projections which would extend out to the rear towards the south-west. The building would be three stories in height in the central areas, dropping down to 2 stories to create a stepped effect. The building would have a flat roof and would be constructed with a mixture of materials, to include an Anglican

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cream facing brick for the majority of the front elevation, complimented by a black smooth brick and a soft red colour render in the recessed areas.

11. The longer projection would have the smooth black facing brickwork at ground floor level and grey render system to the upper floors. Windows would be uPVC and dark grey colour with the exception of the aluminium glazed screens on the front elevation, which have been designed as 'a nod' to the style and design of the original 1950's building. The ground floor would provide facilities such as the main entrance, reception area, offices, sixth form areas, main hall, dining hall, food tech classrooms, textiles, ICT suite, art rooms and workshops. On the first floor further offices are to be provided along with 15 general teaching classrooms, additional ICT rooms, a seminar room and activity studio, whilst on the second floor would be the science labs, prep room, library and staff room. Stair and lift access to all floors would be provided in three locations in the new building.
12. The sports hall would be connected to the new teaching block by a covered link and would be sited to the north of this block, on the edge of the existing parking area. This would be constructed with the same black brickwork at ground floor level and a ruby red fibre cement board cladding to the upper sections, with a polycarbonate glazing system at high level to provide natural daylight. The sports hall would have three indoor courts, cleaning and storage area, with the pupil changing rooms and toilets being created in a lower ground floor level of the main building, making the most use of the change in levels across the site. Stair and lift access would be provided adjacent to the covered walkway.
13. The overall floor area of the new teaching building and sports hall would be 7179.8 sqm - 1053.2 sqm less than the three buildings to be demolished.
14. A new two court MUGA would be created to compensate for the loss of the existing one, removed to accommodate the new building. This would be located to the east of the new building on the site of the old two storey building which is to be demolished. There would be a reorganisation of the on-site car parking under this proposal, as part of the existing parking would be lost due to the siting of the sports hall. The rearranged spaces would be located in the vicinity of the new MUGA, so that in total the number of staff spaces would be 114, with 8 visitor/disabled parking bays and 24 cycle parking spaces. Given the school roll will not be increasing as a result of the works, there will be no increase in on site parking provision. There will also be no alterations to the access for the school, which will remain from Old Dover Road in its existing position.
15. There would be no alterations to the sports pitches laid out on the main section of the playing fields.

Planning Policy

16. The following Guidance/Statements and Development Plan Policies summarised below are relevant to the consideration of the application:
 - (i) **National Planning Policy Framework (NPPF) February 2019** and the **National Planning Policy Guidance** (March 2014), sets out the Government's planning policy

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guidance for England, at the heart of which is a presumption in favour of sustainable development. The guidance is a material consideration for the determination of planning applications but does not change the statutory status of the development plan which remains the starting point for decision making. However, the weight given to development plan policies will depend on their consistency with the NPPF (the closer the policies in the development plan to the policies in the NPPF, the greater the weight that may be given).

In determining applications, the NPPF states that local planning authorities should approach decisions in a positive and creative way, and decision takers at every level should seek to approve applications for sustainable development where possible.

In terms of delivering sustainable development in relation to this development proposal, the NPPF guidance and objectives covering the following matters are of particular relevance:

- That development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road would be severe;
- Achieving the requirement for high quality design and a good standard of amenity for all existing and future occupants of land and buildings;

In addition, Paragraph 94 states that: *The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local Planning Authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should give great weight to the need to create, expand or alter schools.*

- (ii) **Policy Statement – Planning for Schools Development** (15 August 2011) sets out the Government's commitment to support the development of state-funded schools and their delivery through the planning system. It is the Government's view that the creation and development of state-funded schools is strongly in the national interest and that planning decision-makers can and should support that objective, in a manner consistent with their statutory obligations.

The Government believes that the planning system should operate in a positive manner when dealing with proposals for the creation, expansion and alteration of state-funded schools, and that the following principles should apply:

- There should be a presumption in favour of the development of state-funded schools, as expressed in the National Planning Policy Framework.
- Local authorities should give full and thorough consideration to the importance of enabling the development of state-funded schools in their planning decisions. The Secretary of State will attach significant weight to the need to establish and develop state-funded schools when determining applications and appeals that come before him for decision.
- Local authorities should make full use of their planning powers to support state-funded school applications. This should include engaging in preapplication discussions with promoters to foster a collaborative approach to applications and,

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where necessary, the use of planning obligations to help to mitigate adverse impacts and help deliver development that has a positive impact on the community.

- Local authorities should only impose conditions that clearly and demonstrably meet the tests set out on the Planning Practice Guidance website. Planning conditions should only be those absolutely necessary to making the development acceptable in planning terms.
- Local authorities should ensure that the process for submitting and determining state-funded schools' applications is as streamlined as possible, and in particular be proportionate in the information sought from applicants.
- A refusal of any application for a state-funded school, or the imposition of conditions, will have to be clearly justified by the local planning authority. Given the strong policy support for improving state education, the Secretary of State will be minded to consider such a refusal or imposition of conditions to be unreasonable conduct, unless it is supported by clear and cogent evidence.

(iii) The adopted **Canterbury District Local Plan (July 2017)**

Policy SP1 Sustainable Development. This states that when considering developments, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.

Policy EMP9 Education Needs. This states that the City Council will work with the Education Authority and other school and education providers to ensure that provision is made for educational needs, including those arising from new development.

Policy OS2 Playing Fields. This policy seeks to ensure development which would result in the loss of all, or part, of existing playing fields, will only be permitted if the site has first been considered for other sport and recreation uses; that it has been demonstrated that the playing field is surplus to requirements; there is an overriding need for the development which outweighs the loss of the playing field and the loss would be replaced by an equivalent or better provision in a suitable location; or that the development is for a small part of the site where it would result in enhanced sport and recreational facilities.

Policy OS9 Protection of Existing Open Space. This policy states that proposals which would result in the loss of protected existing open space (as identified on the proposals map) will only be permitted if there would be no material harm to the contribution the open space makes to the visual or recreational amenity of the area; the open space has been assessed by the City Council as making no positive contribution to its overall open space strategy; where there would be material harm this would be balanced against demonstrable need for the development; and there are no alternative sites available to accommodate the proposed development and any harm could be offset by the provision of other open space.

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- Policy DBE1 Sustainable Design and Construction.** States that all development should respond to the objectives of sustainable development. Development schemes will be required to incorporate sustainable design and construction measures to show how they respond to the objectives of sustainable development, and non-residential developments should meet a 'very good' BREEAM rating. New development should also be resilient to climate change and include climate change adaptation measures such as solar shading, drought resistant planting, and reducing water consumption.
- Policy DBE3 Principle of Design.** This policy states that the distinctive character, diversity and quality of the Canterbury District will be promoted, protected and enhanced through high quality, sustainable inclusive design, which reinforces and positively contributes to its local context creating attractive, inspiring and safe places. It goes on to list 15 considerations that proposals for development which are of a high quality design must take into account which include things such as the setting and context of the site, visual impact on the skyline, conservation, landscaping and movement of pedestrians, cyclists and cars.
- Policy LB9 Protection, Mitigation, Enhancement and Increased Connectivity for Species and Habitats of Principal Importance.** This policy states that all development should avoid a net loss of biodiversity/nature conservation value and actively pursue opportunities to achieve a net gain, particularly where there are wildlife habitats/species identified as Species or Habitats or Principal Importance; there are habitats/species that are protected under wildlife legislation; or where the site forms a link between or buffer to designated wildlife sites.
- Policy HE1 Historic Environment and Heritage Assets.** This policy states that the City Council will support proposals which protect, conserve and enhance the historic environments and the contribution it makes to local distinctiveness and sense of place. Amongst other matters, it goes on to state that where development would harm the significance of heritage assets, it would be permitted if the loss would be outweighed by the benefit of bringing the site back into use. Any development affecting a heritage asset will be required to submit a Heritage Statement.
- Policy HE11 Archaeology.** This policy states that for planning applications where there is the potential for an archaeological heritage asset, the application must include a desk-based assessment. Where potentially significant archaeological heritage assets may exist, field evaluations will need to be carried out. Where development affects a heritage asset, the archaeological remains should be preserved in situ, but if this is not possible archaeological recording should be

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undertaken in accordance with a specification agreed with the County's Archaeological Officer.

- Policy QL1** **Social Infrastructure.** This policy states that proposals for new buildings or uses for local communities to provide social infrastructure and community facilities will be encouraged and granted planning permission on the basis that any new building is appropriately designed and located, and highway safety and residential amenity would not be prejudiced.
- Policy T1** **Transport Strategy.** This policy states that when considered the location of new development the Council will take into account (amongst other things) how to control the level and environmental impact of vehicular traffic including air quality; providing alternative modes of transport to the car by extending provision for pedestrians, cyclist and the use of public transport; and having regard to the parking strategy.
- Policy T2** **Pedestrian and Cycle Routes.** This states that land will be safeguarded for the pedestrian and cycle routes, as shown on the proposals maps.
- Policy T9** **Parking Standards.** The policy states that the City Council will have regard to the local parking standards set out in appendix 4 of the Local Plan. Where cycle parking is provided it should be convenient, secure, covered and where possible complemented by showering and changing facilities.
- Policy T17** **Transport Assessment and Travel Plans.** This policy states that development proposals considered to have significant transport implications are to be supported by a Transport Assessment and where applicable a Travel Plan.
- Policy CC4** **Flood Risk.** This policy requires all sites within Flood Zone 2 or 3 and sites larger than 1ha in Flood Zone 1 to be accompanied by the Flood Risk Assessment (FRA). Measures identified to mitigate effects shall be installed and maintained as informed by the findings of the FRA.
- Policy CC11** **Sustainable Drainage Systems.** This states that all development applications should include drainage provision to ensure that surface water is appropriately controlled within the development site, and that the risk of on-site or off-site flood risk is not exacerbated by the development. Surface water run off should be managed as close to its source as possible using the Council's hierarchy of discharging into the ground, to a surface water body, to a surface water sewer, highway drain or other drainage system, and to a combined sewer when there are no other options. Approval for the design of long

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term management and maintenance of SuDS will be required prior to commencement of development.

Consultations

17. **Canterbury City Council** raise no objection to the proposal.

KCC Highways and Transportation Officer raises no objection to the application subject to the imposition of conditions to secure vehicle and cycle parking on site; the provision of loading and unloading facilities prior to the occupation of the new buildings; the submission of a detailed School Travel Plan; and the implementation of the submitted Construction Management Plan for the duration of construction activities on site.

Environment Agency (Kent Area) consider the application could be approved as submitted provided conditions are imposed on any consent covering: the submission of a remediation strategy to deal with the risks associated with contamination to the County Planning Authority for written approval prior to commencement of development; that no part of the development be occupied until a verification report has been produced demonstrating the completion of works and effectiveness of the remediation; that, if during development contamination is found that had not been previously identified, no further development be carried out until a remediation strategy has been agreed with the County Planning Authority; approval of a scheme to connect to the foul and surface water drainage system; no infiltration of surface water into the ground without express written consent; and piling or any other foundations using penetrative design are only to be used with express written consent of the County Planning Authority.

KCC County Archaeological Officer raises no objection subject to the imposition of a condition to secure a programme of archaeological work and a historic building record (photographic survey) of the original school prior to demolition.

KCC Biodiversity Officer states that a European Protected Species Mitigation Licence (EPSML) will be required from Natural England and through the ESPML the required mitigation and compensation details in relation to bats would be secured. She raises no objection subject to the imposition of conditions to secure an Ecological Design Strategy; a Landscape & Ecology Management Plan; the submission of a lighting design strategy that would be sensitive for bats and badgers; the submission of a Biodiversity Method Statement for Badgers and hedgehogs; and an informative advising of the need to avoid disturbance to nesting birds.

KCC Conservation Officer states (in summary) that whilst the loss of the existing school building would remove a building of some distinction from the site, the case for demolition is strong. Although such a loss would be a shame for Canterbury's heritage unless refurbishment can be carried out in a similar manner and style to the existing then the effect of the building would be lost in any case. Concurs with the Heritage Statement view that the impact or harm to the surrounding Conservation Areas, Heritage Assets, Listed Buildings or the street scene from the new development would be very low, providing the height of the new build is kept at or below that of the existing.

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KCC Flood and Water Management Officer raises no objection subject to the imposition of conditions requiring the submission of a detailed sustainable surface water drainage scheme; that no building be occupied until a verification report submitted and agreed with the County Planning Authority; and the County Council's approval of any area where infiltration is to be used.

Sport England raise no objection to the proposal.

Kent Police have provided general advice on designing out crime and have met the applicants to discuss the site. Specific areas for discussion included the use of the school outside of school hours, perimeter treatments to the existing boundaries, lighting for the car park and pathways, CCTV, access control, door and window security, alarms to fire doors and defensive planting options. They state that they have no further concerns at this time, as their concerns relate to the management plans for the school not the proposed development.

Local Member

18. The local County Member for Canterbury City South, Ida Linfield was notified of the application on 14 January 2019. No written comments have been received.

Publicity

19. The application was publicised by the posting of three site notices, an advertisement in a local newspaper, and the individual notification of 304 nearby properties.

Representations

20. In response to the publicity, one letter has been received objecting to the application, one letter raises comments about the application, and eleven letters of support have been received.

The key points raised can be summarised as follows:

Letters of Support

Of the 11 letters of support submitted, 3 provided the following additional comments:

- Strongly support the application which has little or no impact on surrounding property and will greatly enhance the learning environment for our children, now and in the future;
- It would be brilliant to have a new school built – there has been talk of this for a number of years;
- The existing building is cold in the winter;
- It would be sensible to use this opportunity to modify the school entrance and bus lane. The narrow and twisting entrance and driveway adds to the congestion on the Old Dover Road. The existing driveway prevents any chance of school buses

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picking up and dropping off ON the school site and makes it difficult for vehicles larger than a minibus to gain access to the site, which massively adds to congestion. On most days there is not enough space in the bus layby for all the buses to park, so traffic is backed up whilst the students embark or disembark;

- Even just extending the bus layby to run the length of the front of the school would improve things.

Letter of Comment

- Considers the only suspension of on-road parking should be to the bay opposite the school entrance, and then kept to a minimum, weekdays only if appropriate, and lifted as soon as the main construction phase is complete;
- There is no reference to the control of fumes, in particular dust. Can conditions be imposed to ensure appropriate screening, use of bowsers etc, during both demolition and construction. Dust could have a greater impact on the health and well-being of neighbours than noise.

Letter of Objection from the Canterbury Society

- Strongly object to the proposal to demolish the existing school building;
- Acknowledge that the buildings need refurbishment and enhancement to bring them closer to current standards;
- Building was designed by Hugh Wilson in 1951 and is listed in Pevsner's' Buildings of England, where they are described as 'Brick and glass elegantly handled';
- These buildings are unique and new buildings of this quality are rare. The architecture is not only of value in itself, but also as part of the city as a whole;
- If familiar sights, such as these, disappear, our lives will become more impoverished and our sense of place will evaporate;
- Urge that the application to demolish these important buildings be rejected, and that they are retained so that future generations may appreciate them too.

Discussion

21. In considering this proposal regard must be had to the Development Plan Policies outlined in paragraph 16 above. Section 38(6) of the Planning and Compulsory Purchase Act (2004) states that applications must be determined in accordance with the Development Plan, unless material considerations indicate otherwise. The proposal therefore needs to be considered in the context of the Development Plan Policies, Government Guidance and other material planning considerations arising from consultation and publicity.

22. This application is being reported for determination by the Planning Applications Committee due to the objection raised by The Canterbury Society as set out in paragraph 20 above. In my opinion, the key material planning considerations in this particular case are the principle of development and the need for education facilities; the loss of the existing building; the siting and design of the new building and any impact on the wider area and residential amenity; and any highway and transportation implications linked to the proposal.

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Principle of Development, Education Need and Loss of the Existing Building

23. Planning policy guidance in the form of both the NPPF and the Policy Statement for School Development are strongly worded to ensure that proposals for the development of state funded schools should, wherever possible, be supported. The guidance is set out in paragraph 16 above and in summary states that there should be a presumption in favour of the development of state funded schools; that planning authorities should take a proactive, positive and collaborative approach to meeting this requirement; and that any refusal would have to be clearly justified. Furthermore, at the local level Policy EMP9 of the Local Plan states that the City Council will work with the Education Authority to ensure that provision is made for educational purposes.
24. The existing school is made up of a number of buildings which have gradually been added to the site since the main school building was constructed in the 1950's. As set out in the background section, Simon Langton Girls Grammar has been selected as part of the Government's Priority School Building Programme (PSBP) which aims to replace or refurbish school buildings which are no longer fit for purpose. The investigation as part of the PSBP programme found that there were three blocks that were 'time-expired' and needed to be replaced. There are a number of health and safety concerns about all of these buildings in relation to their structures and the suitability of the buildings to still be used for teaching purposes. In particular the original school building is constructed from concrete which is spalling and crumbling and needs regular monitoring to advise what needs to be done to maintain a safe environment for the students and staff. The use of asbestos, window defects, disrepair of the roof structures and poor and/or lack of insulation have resulted in the buildings being deemed beyond economic repair.
25. The application has been supported by the submission of a 6 monthly building inspection report, which is carried out by Structural Engineers to monitor the distress of the original building and identify extended defects so they can be dealt with before becoming hazardous. In addition a 'Refurbishment Feasibility Study' also accompanies the application. This was carried out in December last year and looked at the costs of refurbishment versus replacement and sets out in more detail the defects in each of the three buildings to be replaced. The cost analysis of refurbishment v replacement concluded that it would provide better value to replace the school due to the extensive defects of the existing building. In addition a new build would be more efficient in size, therefore have a smaller footprint and be more energy efficient and cost effective to maintain in the long term.
26. From a practical point of view, therefore, the replacement of the original school and the later additions with a new building is considered by the applicants and the Government's PSBP the best option. However, the original school building is of some architectural merit, having been designed by a renowned local architect Sir Hugh Wilson. It is not listed but has some local historic interest, and the County Council's Conservation Officer has considered the information contained within the Heritage Statement, which was also submitted in support of the application. This concludes that the school redevelopment would remove a building of distinct style from the site, but that the school building is of low quality and has reached the end of its life. The Conservation Officer also noted that in order to retain the buildings distinctive character

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the refurbishment works would have to have been undertaken in the style of the original building which would not be practical in this day and age, and the character and style would be lost in any event. Whilst the City Council has raised no objection to the proposal, The Canterbury Society have objected to the planning application on the basis of the loss of the original school, stating that the building is unique, that new buildings of this quality are rare, and that it should be retained so that future generations can appreciate them too.

27. Whilst their views are of note, the balance that needs to be made in dealing with this planning application is for the loss of the building and its architectural merit, weighed against the modernisation required to make the buildings fit for modern teaching purposes and how such works might affect the overall appearance of the building in any regard, and the poor conditions experienced by the students and staff who have to occupy the building on a daily basis and the health and safety aspects of this. In my view, given the building is not of sufficient architectural merit to have been listed, and given that it does not play a prominent part in the local street scene due to its siting well back from the road frontage, the balance would fall with the proposal to demolish the existing building and replace it with a new structure.
28. The site falls within a built-up area on a previously developed site, and it is considered that the principle of demolishing the existing building and its replacement with an alternative school building is acceptable and would be in accordance with the NPPF, the Policy Statement for School Development, and Policies SP1 and EMP9 of the Canterbury District Local Plan.

Siting and Design of New Building

29. The proposed replacement building would be sited to the rear of the existing main building, on the location of the existing MUGA, so that it would sit almost centrally within the site. Located further back from the road frontage than the original and at an elevated height from the road, it is considered that the proposed new building would have a limited impact on the street scene as it would not be clearly seen until approaching via the entrance drive. The area in front of the new build, on the footprint of the existing building would be utilised for staff and visitor parking and a slightly revised drop off loop. Given the location of the new building and the loss of the existing MUGA, a new 2 court MUGA would be provided to the east of the parking area, where the other two buildings no longer fit for purpose would be demolished.
30. The School benefits from a large site, and although the siting has been partly dictated by the position of the existing building, and the need to retain this while work is carried out, it is considered that the proposed location of the new building would be appropriate within the site. Sitting centrally, the building would have a limited impact on the street scene or surrounding residential properties given the large distances that would be retained between the new build and the school boundaries. The existing boundary screening would, on the whole, be retained thus ensuring a sufficient screen is maintained along the boundaries to limit any impact.
31. The building itself has been designed as a part three storey and part two storey structure, with a small single storey element on the front elevation. The building design

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reduces the footprint at each level, thereby helping to reduce the overall bulk of the building and therefore its visual impact. The building would be flat roofed and has been designed so that it retains a similar front elevation towards Old Dover Road and incorporates window designs on this elevation which aim to reflect the style of the original building, but in a modern form. By separating the sports hall from the main teaching block and utilising the change in levels across the site, the sports hall would sit at a lower level and this would further reduce the impact of built form on the site. Access from one to the other would be via a covered walkway.

32. The building is modern in its design and appearance but would occupy a smaller footprint than the buildings it would replace due to its more efficient layout. Overall it is considered that the siting and design of the building would be appropriate for this site and would comply with the aims of Policies DBE3 and QL1 of the adopted District Local Plan.

Sports Provision and Loss of Open Space

33. The proposed development would replace an existing MUGA with a new 2 court MUGA, and also provide a new dedicated indoor three court sports hall, which the school don't currently have. The sports provision would therefore enhance the school's current provision and would be appropriate for the number of children at the school. The new sports hall and the edge of the new teaching building would encroach slightly onto an area considered by Sport England as 'playing field', and they were therefore consulted on the planning application. After consideration of the application they have concluded that the section of land that would be lost is at a significantly different level to the rest of the playing field, making it incapable of forming part of a playing pitch, and thus meeting exception 3 of their Playing Fields Policy. They have therefore raised no objection to the application, and the proposed development is considered to comply with Policy OS2 of the Local Plan.
34. The existing sports playing fields are also designated as 'Existing Open Space' in the adopted Local Plan, and therefore the small loss of open space needs to be assessed against this policy. The Policy states that proposals resulting in the loss of open space will be permitted if there would be no material harm to the contribution the open space makes to the visual or recreational amenity of the area; the open space has been assessed by the City Council as making no positive contribution to its overall open space strategy; where there would be material harm this would be balanced against demonstrable need for the development; and there are no alternative sites available to accommodate the proposed development and any harm could be offset by the provision of other open space.
35. In terms of the contribution open space makes to the amenity of the area, although there would be a loss of open space alongside the existing playing fields, the smaller footprint of the proposed building would mean that generally within the site there would be an increase in open space, and this would contribute to the overall strategy for open space. It is considered that the loss that would occur would not cause any material harm to the open space strategy and weighed against this would be the demonstrated need for the replacement education facilities. In terms of any alternative site, the location of the new building has been dictated by the need to retain the existing building

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whilst the proposal is constructed, and the need to avoid the playing pitches themselves and the wooded habitat area and is also constrained by the other buildings to be retained on site. Overall it is considered that the net gain in open space on the whole site due to the smaller footprint of the proposed building, alongside the above considerations, would not result in a material harm to the Council's open space strategy and Canterbury City Council has raised no objection to the proposed development. It is therefore considered that the proposed development would comply with Policy OS9 of the Local Plan.

Access, Parking and Highways

36. The application has been accompanied by a Transport Technical Note which has been considered by the County's Highways and Transportation department. The Technical Note clarifies the position that the number of staff and pupils that would be accommodated on site as a result of this proposal would not change. The vehicular access to the school would remain in its current position onto Old Dover Road and would not be changed under this proposal. The on-site layout of the access road and the location of the staff and visitor parking spaces would be rearranged to take into account the siting of the new building, but the number of parking spaces on site would remain the same. Given the number of pupils and staff would not be changing there is no planning requirement for the proposal to include any improvements to the layout, in particular for the access, or any increase in parking provision. Most of the neighbour comments received however, raise the parking in the vicinity of the school and congestion at drop off and pick up times as a matter of concern.
37. Whilst it would be preferable to seek to address these matters at the same time as the new build is constructed, the funding for this school project has strict limitations imposed by the Government's PSBP programme. The Area Education Officer has advised that the limitations of the funding programme have meant that the proposal cannot be extended to include any additional development. The Education Officer goes on to reiterate that the school is being built for a Published Admission Number (PAN) of 155 per year, slightly below current numbers, and that the reduced square footage of the new build would not allow any additional growth in numbers. Should the school be considered for an increase in school roll in the future, the Area Education Officer has confirmed that the highway mitigation measures would be considered.
38. The Highways and Transportation Officer has also requested that electric vehicle charging points be provided for 10% of the spaces provided in the car park. The provision of electric vehicle charging facilities does not form part of any adopted parking standard or Policy, and once again, given the fact the school roll is not increasing as part of this application, there is no planning justification for requiring the applicants to provide these charging facilities. The applicants have, however, been informed of this request and have advised that there is no funding in the budget for this scheme to incorporate the charging facilities, but that capacity would be left in the site to provide these in the future should funding become available.
39. On the basis that there would be no change in the number of pupils and staff accommodated on site, and therefore no additional trip generation with the exception of short-term construction traffic, the existing access and parking provision (which would

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be maintained) is considered acceptable from a planning perspective. The proposals are therefore considered to accord with Policies T1, T9 and T17 of the adopted Local Plan and will not affect the safeguarded cycle route across the rear of the playing field, in accordance with Policy T2.

Flood Risk and Drainage

40. The application was supported by the submission of a Flood Risk Assessment, which identifies that the site is entirely within Flood Zone 1, where there is the lowest risk of flooding. Table 2 of the NPPF Planning Practice Guidance lists this type of development as 'more vulnerable' and such development is considered appropriate in areas classified as Flood Zone 1. Overall the FRA has demonstrated that the development should not be precluded on flood risk grounds.
41. The application has also been accompanied by a Drainage Strategy and associated drainage layout drawings, which have been considered by the County's Flood and Water Management Team. The documents provide a detailed description of the foul and surface water drainage systems for the proposed development and the team are satisfied with the principles of the attenuation tanks connected to two deep soakaways for the infiltration of surface water into the ground. However additional information would need to be provided as part of the detailed design and this could be secured through suitably worded conditions that would require further information to be submitted before any development commences. These would cover details of the sustainable surface water drainage scheme; a verification report covering this scheme to be approved by the Lead Local Flood Authority; and that where infiltration is used to manage surface water drainage it is only in those parts of the site where there would be no unacceptable risk to controlled waters and/or ground stability.
42. Provided the additional information is secured via condition, the proposal is considered to be acceptable in relation to surface water and drainage, and in accordance with Policies CC4 and CC11 of the adopted Local Plan.

Landscape and Trees

43. The proposed development would not have any impact on the established boundary landscaping, given the containment of the development within the centre of the site. However, the application has been supported by both a Landscape Submission and a Preliminary Tree Survey Report, which detail those areas that would require re-landscaping should planning permission be granted. This includes new areas of general amenity grassland on the areas of the site where the existing building would be demolished and an area of reinstated wildflower meadow to the east of the proposed MUGA. Small areas of shrub and hedge planting would be added around the revised visitor car park and main reception area, and these would be a mix of ornamental and native species appropriate for a school setting.
44. The Tree Survey Report identified trees of varying age, species and quality with a large percentage of mature trees within the site. A small number of new UK native broad leaf trees are proposed to be added to the site under the landscape scheme, located in the newly formed social spaces to provide structure, shading and ecological enhancement.

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The trees are proposed at heights of 3-5m and a girth of 8-12cm (dependant on the species) so that they are of a reasonable size when planted. A condition is proposed to ensure that the planting should be undertaken in the first available planting season and any plants or trees that die within the first 5 years of planting are replaced.

45. The proposed development is therefore considered to be acceptable in relation to the landscape scheme proposed which would accord with the aims of Policy DBE3 of the Local Plan.

Archaeology

46. The application has been supported by an Archaeological Desk Based Assessment which looks at the potential for the development area to have any significant archaeological features. The assessment finds that the site falls within an area classified by the Stour Valley Palaeolithic Character Area Project which covers the plateau between the Great Stour and Little Stour which underlies the application site and suggests the potential for the site to produce material dating from Palaeolithic times. Evidence also suggests that there may be finds relating to the Bronze Age and Iron Age as well as from the Roman period. The proximity of the site to the Canterbury to Dover road, known as a well-used route during Anglo-Saxon and medieval times, suggests that there may also be the possibility of finds relating to this era. The Assessment states that significant archaeological features, artefacts or ecofacts may be disturbed or destroyed by the proposed ground works and that such destruction without proper record risks a major negative impact on the historic environment.
47. The KCC Archaeological Officer has considered the report and advises that given the archaeological potential of the site it is possible that the proposed development could impact remains of archaeological interest. As such it is recommended that a condition should be imposed on any consent given, for a programme of archaeological works. Such a programme would need to be undertaken in a staged manner with trial trenching forming the first stage of the archaeological works, and the results of the evaluation works informing the scope and nature of any subsequent stages of archaeological investigation that might be required. A further condition is also requested for an Historic Building Record be made of the original school prior to demolition, in the form of a basic photographic survey, to take account of the social/communal interest of the school buildings. These conditions have been set out in paragraph 73 below.
48. The application is therefore considered to be in accordance with the aims of Policy HE1 and HE11 of the adopted Local Plan.

Ecology

49. The application has been supported by the submission of a Preliminary Ecological Appraisal (August 2017), an Ecological Impact Assessment (December 2018) and a Bat Report (December 2018), all of which have been assessed by the County Council's Biodiversity Officer. The reports note that there is one statutory designated site within 2km of the school, the Chequers Wood SSSI, which lies to the north-east of the site. There are also four designated ancient woodlands within 2km of the site, but given the

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distances involved no further survey, assessment or mitigation is required in terms of the statutory or non-statutory designated sites.

50. The protected species assessed included notable invertebrates, amphibians, reptiles, birds, bats, badgers and other mammals. Of these the report states that due to the lack of suitable habitat there are unlikely to be any invertebrates or amphibians on the site, but that the likelihood of the common frog and toad being present was 'medium'. The reports recommend that any amphibians encountered during construction should be moved to a location of safety. The likelihood of any common species of reptile on the site is also assessed as 'medium' with the grassland area in the woodland providing habitat suitable for foraging and basking, and the woodland and scrub places for shelter. Although the site adjoins other suitable habitat present along the dismantled railway in the south-east corner, the lack of an extensive habitat means there is unlikely to be a large population, and therefore further survey work was not considered necessary. The report simply recommends that precautionary working methods are adhered to if any suitable habitats are affected by the proposal.
51. The original survey revealed that there was one badger sett on the site, with one well used entrance located in the woodland, and the open grassland provides suitable foraging opportunities for badgers. Further clarification was sought from the applicants regarding badger setts and another site walkover was carried out on 1st March 2019. This established that there were three setts on the site. A 'Badger Habitats Impact Plan' has also now been submitted, and this demonstrates that the badger sett would not be destroyed by the proposed works. Works within 30m of this badger sett would be carried out under the direct supervision of the Ecological Clerk of Works (ECOW) who would be employed to oversee development in relation to all ecological constraints on the site. Works would be carried out in accordance with a detailed 'Biodiversity Method Statement: Badgers' which the County Council's Biodiversity Officer has requested be secured by condition on any consent given.
52. The likelihood of active bird nests being present within the site in the trees, ornamental planting, shrubs and hedgerows is assessed as being 'high', and it is therefore recommended that any vegetation clearance should be carried out outside of the core nesting season (March to August inclusive) or the site checked by a qualified ecologist to ensure there are no nests present. If any active nest is found during construction a suitable stand-off area needs to be maintained until the young have fledged. This protection can be covered by an informative regarding the protection of birds under the Wildlife and Countryside Act 1981. The site also has habitat assessed as being suitable for hedgehogs and the report recommends that a method statement should be drawn up to ensure the potential to impact upon this species is addressed. It is proposed that this could be included in the Biodiversity Method Statement referred to above.
53. In relation to bats, a bat emergence survey, an elevated tree inspection and an endoscope survey of the trees was undertaken in August and September last year. The accompanying Bat Report notes that soprano pipistrelle and common pipistrelle bats were seen emerging from the buildings on site and that the proposed footprint of the development works supports at least four known bat roosts and possibly a fifth. The roosts are, according to the report, likely to be non-breeding transitional roosts, used by

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low numbers of bats and of low conservation significance at a local level. The site was also seen to be used for foraging bats including the common and soprano pipistrelle and noctule and brown long eared bats. As a result a European Protected Species Mitigation licence will be required prior to works starting on the demolition of the buildings and the licence will detail the precise mitigation proposals to prevent harm to bats during works on site.

54. The County's Biodiversity Officer has considered the findings of the three reports and states that as the competent authority in determining the application, KCC must have regard to the requirements of the Habitats Directive in the exercise of their functions. As such they must consider whether it is likely that an EPSM licence from Natural England would be granted. The Ecological Impact Assessment stated that there was a risk that the survey may not have detected bat roosts present earlier in the year (e.g maternity roosts) and therefore further advice was sought from the applicant to demonstrate that additional compensatory measures that would be required *should* a maternity roost be identified on site, are achievable within the proposed development. In addition, the Bat Report states that precautionary measures for hibernating bats are considered necessary, therefore clarification has also been sought regarding compensatory provision for roosting opportunities for hibernating bats.
55. The applicants have submitted additional information in response to this including a 'Post-Development Habitat Plan (Roosting Bats)' which provides an indicative location and specification for a compensatory standalone bat building. This would only be delivered if the update bat emergence survey (prior to building demolition) identifies the presence of a bat maternity roost. This would allow full compensation for the loss of any bat maternity roost(s) identified and the detailed specification for this structure (if required) would be subject to conditions of the Natural England mitigation licence. In addition, the 'Post Development Habitat Plan' sets out the treelines where three 1FW Schwegler Bat Hibernation Boxes will be delivered. These would be provided prior to the commencement of building demolition to compensate for the loss of bat hibernation opportunities when the existing buildings are demolished. In total 13 bat boxes would be provided on site, which would include:
- Five compensatory bat boxes suitable for summer roosting (specification to be agreed through the Natural England Licence);
 - Three compensatory bat hibernation boxes (1FW Schwegler Bat Hibernation Boxes); and
 - Five additional (enhancement) bat boxes - specifications provided on the 'Post Development Habitat Plan (roosting bats)'.

The applicants have noted that the design specification of the new school building does not allow for the delivery of compensatory bat roost features within or mounted on the new buildings and therefore the bat boxes would be delivered in the mature trees along the boundary and woodland edges, shown on the plan forming part of the 'Post Development Habitat Plan'. The specific location of the each of the bat boxes would be determined by the Ecological Clerk of Works (ECoW) in consultation with an arboricultural consultant, the project's health and safety consultant and the School, and the ECoW would directly supervise the installation of all 13 bat boxes.

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56. Given the additional information received, the Biodiversity Officer is satisfied that a licence would be granted and that there are no ecological reasons why planning permission should not be granted. The bat mitigation and compensation would be secured within the licence, therefore a separate condition is not required to secure the details as part of this application. However, given the presence of bats on sites, a bat sensitive lighting scheme is recommended and a condition is proposed to secure this prior to commencement of development.
57. The loss of hedgerows as part of the development would have an ecological impact, but new hedgerows are proposed and if designed and managed in accordance with the recommendations in the Ecological Impact Assessment would provide adequate compensation for the losses. The redevelopment of the site also provides opportunities to incorporate features into the design which are beneficial for wildlife and included in the application are the creation of a wildflower meadow and proposals to incorporate bat and bird boxes (in addition to those necessary for mitigation/compensation). Measures to enhance biodiversity should be secured by condition, in accordance with the advice of the NPPF. The Biodiversity Officer has proposed a condition to be included on any consent given for an 'Ecological Design Strategy' and this would secure details to be submitted before development commences for the retention and protection of existing habitats; the creation of semi-natural habitats (hedgerows and meadow area); and ecological enhancement measures. In addition a 'Landscape & Ecology Management Plan' is also proposed for the ongoing maintenance of the landscape and ecological areas.
58. Subject to the imposition of these conditions it is considered that the proposed development could be carried out with suitable mitigation to ensure no protected species are harmed and therefore development would accord with the aims of Policies DBE3 and LB9 of the adopted Local Plan.

Noise and Construction

59. A Noise Impact Assessment was prepared to accompany the application, to assess the impact of noise in respect of the site's suitability for education use. The assessment has been undertaken in light of the advice in the NPPF which states that planning policies and decisions should aim to avoid noise giving rise to significant adverse impacts on health and quality of life as a result of new development. Noise measurements were taken from three positions on the site, one centrally by the proposed location of the new school building, one to the rear of the site towards The Foreland and one at the front of the site by Old Dover Road. The report concludes that the site is suitable for school development and that noise emissions from use of the proposed MUGA are not expected to adversely impact on nearby residents. The proposals would be in accordance with Policy DBE3 of the Local Plan in relation to acoustic impact.
60. One of the neighbour comments raised was in relation to dust control measures for the site. The control of dust during demolition and construction would be dealt with under normal construction practices (and is addressed in the submitted Construction Management Plan) and it is considered unnecessary to impose any additional controls on the development as part of the planning permission.

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61. A Construction Management Plan (CMP) has been submitted as part of the planning application to establish the construction details now rather than leave them to be agreed as a condition. Highways and Transportation state that construction works would need to be carefully planned and managed to ensure the safety of pupils, staff and residents. The submitted CMP includes amongst other matters that no traffic movements, including deliveries, should occur along Old Dover Road during school start and finish times; the location of parking and turning areas for construction and delivery vehicles and for site personnel and visitors; and the provision of wheel washing facilities. It also sets out that the three on road parking spaces opposite the access to the school, which would need to be suspended to allow large vehicles to enter and leave the site safely, will be re-provided further down the highway so that local residents would continue to have on road parking close to their homes. Given that there are neighbouring residential properties to the site, if planning permission is granted it is considered appropriate to restrict the hours of construction to protect residential amenity (Monday to Friday between 0800 and 1800; Saturday 0900 to 1300; and no operations on Sundays or public holidays), and this can be covered by a condition.

Contamination

62. A Phase 1 Geo-Environmental Desk Study Assessment and a Phase 2 Geo-Environmental Site Investigation have been undertaken for the site and an Interpretative Site Assessment Report has also been prepared in support of the application. The documents have been considered by the Environment Agency who have responded to the application as set out in paragraph 17. They have provided assurances that the development could be carried out without unacceptable risk to the environment provided a number of conditions are imposed on any permission given. The first would ensure a remediation strategy is approved by the County Planning Authority before development commences, which would address the analysis and conclusions that were missing from the Phase 1 Geo-Environmental Desk Study. A further condition requiring a verification report demonstrating the completion of the works and the effectiveness of the remediation strategy is sought, so that there would be no risk to controlled waters, specifically the Principal and Secondary Aquifer within Source Protection Zone 3. A further condition to ensure that if any contamination is found during construction, not previously identified, then development shall stop until a method of dealing with the contamination has been agreed with the County Planning Authority.
63. The Environment Agency response goes on to stipulate conditions relating to foul and surface water drainage system, and infiltration of surface water into the ground, which reiterate the advice given by the County's Flood and Water Management Authority, as set out in paragraphs 17 and 41 above. Finally, they request that a condition be imposed restricting piling or other foundation designs using penetrative methods without consent in order to ensure there would be no unacceptable risk to groundwater. These controls are addressed in my recommendation.

Sustainability

64. Planning policy at all levels recognises the need to address climate change and to reduce the amount of energy consumed by development. The NPPF places a

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presumption in favour of development that is sustainable and planning policy SP1 of the Local Plan reflects this guidance. Policy DBE1 states that development should incorporate sustainable design and construction measures to show they respond to the objectives of sustainable development, and states that non-residential development should meet a 'very good' BREEAM rating. The proposed scheme has been designed to offer a sustainable solution, which is practical and meets the needs of the school, within the constraints of a fixed budget. The Department for Education do not request formal BREEAM certification, and therefore the proposed scheme has not followed this process. However, the development does have to adhere to the Department for Education's 'Government Output Specification 2017', which sets out detailed specifications of new buildings. The applicant has advised that Annex 2H of Part B of the guidance sets out the required technical standards and performance criteria for energy in schools and sets a very onerous requirement in terms of new school buildings. They state that when the energy requirements for schools are assessed against an environmental assessment like BREEAM it inevitably achieves a minimum BREEAM rating of 'very good'.

65. The energy approach for the new school is predominantly a passive one using a fabric first approach. The thermal mass would be maximised by using concrete structures for the floor and ceilings (to all floors), the use of natural ventilation to the majority of areas, an energy efficient heating system, and an energy efficient LED lighting system coupled with the provision of natural daylight to spaces. Measures which minimise the buildings carbon footprint would include the use of thermal mass, solar shading in the summer, night cooling, high efficiency plant and equipment, and advantageous solar gain in the winter. Energy saving products and techniques would also be integrated into the buildings design to achieve reductions in CO2 emissions, and these include movement and absence sensors for lighting control, heat recovery mechanical ventilation, low energy lighting, and high efficiency water heating plant, to name but a few.
66. The application has been supported by the submission of an Energy Assessment Report, an Environmental Strategy and an Outline Mechanical and Electrical Services Specification. The Environmental strategy details the low and zero carbon (LZC) technologies that were also considered for this development and concludes that of those assessed the two that would be most appropriate for this site would be combined heat and power (CHP) and photovoltaic panels (PV). CHP was also then discounted because it has a limited application in schools due to the reduced all year round heat load, especially in the summer months. PV panels therefore would have been the most appropriate LZC technology for the school development, however the report states that the passive and active energy efficiency CO2 reduction techniques proposed are sufficient to meet the energy requirements for the project.
67. Given that the new building would incorporate energy saving features that would be equivalent to achieving a 'very good' BREEAM rating it is considered that additional LZC technologies cannot be justified in this instance and that the proposed development would meet the aims of Policy DBE1 of the Local Plan.

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Community Use

68. The school is currently used by the community for a number of events and regular clubs such as utilising the school field for parking for County cricket games, use of the school hall for the 'Stagecoach' drama company, 'Arts Fest' held in the summer, music groups and martial arts groups to name a few. The design of the new school would allow for all of these community uses to continue and has been designed to ensure that the relevant spaces (main hall, sports hall, dining area etc) can be accessed independently from the teaching areas to ensure site security.

Secured By Design

69. Kent Police have provided comments on the application from a 'secured by design' perspective and the applicants have had a meeting with the Police to discuss the security concerns they have raised. The application would include a new secure fence line for the school for safety, CCTV would be provided to the perimeter of the building and there would be lighting for the new car park. However, some of the initial points raised by Kent Police fall outside the scope of this application (such as the existing boundary treatments, defensive planting etc) and they state these would need to be addressed by the School at a later date. The applicants have further commented that all PSBP2 projects are designed and constructed to the Department for Education's detailed Output Specification. This covers a range of matters including lighting and ventilation to creating clear sightlines for effective management.

70. The intention is to make the site secure and safe for staff and pupils, and Kent Police have accepted, following the meeting with the applicants, that their concerns relate to the management plans of the School rather than the development proposals. The Local Plan states that development should incorporate principles of best practice in designing out crime and that new proposals should be mindful of the advice contained in 'Design for Crime Prevention: A Kent Design Guide for Developers, Designers and Planners', and the City Council's own 'Crime Prevention through Design' document. It is considered that the proposed development has been designed in light of these documents and would be acceptable.

Conclusion

71. In my view the key determining factors for this proposal are the principle of the demolition of the existing building and the appropriateness of the design and siting of the new school against the strong policy support for education facilities to meet the needs of existing communities. Policy requires great weight to be attached to the need to create, expand or alter schools. In my view, whilst the architectural merit of the 1950's building is recognised, the retention of the original building on the basis of its architecture would not be sufficient to outweigh the need for the existing school buildings to be demolished due to their poor state of repair and the health and safety concerns this brings with it. The submitted reports have established that the buildings are no longer fit for purpose. This has been recognised by Central Government in that the project is being promoted as part of the PSBP which seeks to replace education buildings that are no longer fit to meet current educational needs. The proposed building would be sustainable through its construction methods, utilising energy efficient

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design such that additional low or zero carbon technologies are not justified, and the design of the building would still meet an equivalent 'very good' BREEAM rating.

72. The proposed development does not involve any increase in school roll and therefore brings with it no additional impact in terms of school traffic and parking issues. The Construction Management Plan would address the short-term impact of construction on the surrounding area. The development can be accommodated without impact to ecology, landscape, controlled waters, ground stability, contamination, or archaeology, all of which can be suitably mitigated by the proposed conditions. In my view the development is sustainable, in accordance with the aims of the NPPF and the Development Plan policies, and there are no material planning considerations that indicate that the conclusion should be made otherwise. I therefore recommend that planning permission be granted.

Recommendation

73. I RECOMMEND that PERMISSION BE GRANTED, SUBJECT TO the imposition of conditions covering (amongst other matters) the following:
- The standard 3 year time limit;
 - The development to be carried out in accordance with the permitted details;
 - The submission and approval of details of all construction materials to be used externally;
 - The provision and permanent retention of the vehicle parking spaces as shown on the submitted plans prior to the occupation of the school and their retention thereafter;
 - The provision and permanent retention of vehicle loading/unloading and turning facilities, as shown on the submitted plans, prior to the occupation of the new buildings;
 - The provision and permanent retention of secure, covered cycle parking facilities prior to the occupation of the building, in accordance with details to be submitted and approved by the County Planning Authority;
 - The submission of a detailed review of the School Travel Plan incorporating measures to encourage sustainable transport;
 - The implementation of the submitted Construction Management Plan for the duration of the construction activities on site;
 - That works shall only be carried out on site between the hours of 0800 to 1800 Monday to Friday; 0900 to 1300 on Saturdays; and no operations on Sundays or public holidays;
 - Submission of a detailed surface water drainage scheme;
 - Submission of a verification report covering this scheme to be approved by the Lead Local Flood Authority;
 - No infiltration of surface water drainage into the ground, other than with the written approval of the County Planning Authority and shall only be used in those areas where there would be no unacceptable risk to controlled waters or ground stability;
 - The development shall not commence until a scheme to connect the building to foul and surface water drainage systems has been submitted and approved by the County Planning Authority;
 - The Landscape scheme set out in the Landscape Submission shall be implemented

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as set out within the first available planting season once the development is occupied;

- Any plants or trees that die within the first 5 years after planting shall be replaced;
- No development shall take place until the applicant has secured the implementation of a programme of archaeological work in accordance with a written specification and timetable to be approved in writing by the County Planning Authority;
- No demolition of the original school shall take place until an Historic Building Record (basic photographic survey) has been made to record the building for social and communal interest;
- Prior to the commencement of development, the submission of a Biodiversity Method Statement for the protection of badgers and hedgehogs to be approved by the County Planning Authority;
- The submission of a bat and badger sensitive lighting scheme to be approved by the County Planning Authority;
- The submission of an 'Ecological Design Strategy' prior to the commencement of development, to be approved by the County Planning Authority, relating to the retention and protection of existing habitats, the creation of semi-natural habitats and ecological enhancement measures;
- The submission of a 'Landscape & Ecology Management Plan' to cover the ongoing maintenance of the landscape and ecological areas;
- No development shall commence until a remediation strategy to deal with risks associated with contamination of the site has been submitted to the County Planning Authority and approved in writing;
- No occupation of the new building until a verification report has been submitted and approved in writing by the County Planning Authority that demonstrates the completion and the effectiveness of the remediation works;
- If during development contamination not previously identified is found to be present, then no further development shall take place until a remediation strategy has been agreed with the County Planning Authority;
- No piling or penetrative foundation methods be used on site without prior written consent of the County Planning Authority.

74. I FURTHER RECOMMEND that the following INFORMATIVES be added:

- That the applicant ensures that all necessary highway approvals and consents are obtained;
- To ensure that works to trees are carried out outside of the breeding bird season and if this is not possible that an ecologist examines the site prior to works commencing;
- The EA refers the applicant to the guidance document 'Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention';
- The EA advise that there should be no surface water discharge by SuDS on land impacted by contamination or land previously identified as being contaminated;
- Contaminated soil that is, or must be, disposed of is waste and therefore its handling, transport, treatment and disposal is subject to waste management legislation.

Item D1

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Case Officer: Mrs Helen Edwards

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Background Documents: see section heading