

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 proposed erection of a part three part four-storey teaching block with attached sports hall and associated hard and soft landscaping, a new Multi Use Games Area (MUGA) together with parking and ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

A report by Head of Planning Applications Group to Planning Applications Committee on 4th December 2019.

Application by Kent County Council & Kier Construction (Southern) for Demolition of existing school buildings and proposed erection of a part three part four-storey teaching block with attached sports hall and associated hard and soft landscaping, a new Multi Use Games Area (MUGA) together with parking and ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – 19/01120 (KCC/DO/0195/2019).

Recommendation: SUBJECT to Historic England determining that the existing school buildings are not of listable quality, that permission be granted subject to conditions.

Local Members: Mrs Pauline Beresford & Mr Nigel Collor

Classification: Unrestricted

Site

1. Dover Grammar School for Boys is a selective secondary school catering for boys aged 11-16 years old, with a mixed gender 6th Form. The school is located on the western outskirts of Dover on a prominent slope which overlooks the town including the docks and Dover Castle. The School site is formed of three terraces – the top terrace houses the original school buildings which are located at the north-western end of the site where Noah's Ark Road runs along the school site boundary. The middle and lower terraces provide playing field facilities for the school and are known as the 'upper' and 'lower' fields, each separated by a steeply sloping vegetated bank. Astor Avenue runs along the south-eastern boundary of the school grounds. In addition to these terraces, the School grounds also include Leney's Field, which lies to the south of the lower terrace. This field is scrubby and undulating in nature and is not currently used for any formal sport. Leney's Field is separated from the rest of the school site by the access road serving Astor College.
2. The school was completed in the early 1930's and is of a traditional style constructed from stone, flint, render and brick. It is linear in footprint across the site and due to the change in levels across the site is built over 6 storeys. There are two main three storey ranges built at right angles around a quad (used as a playground) and these are rendered and white washed, with red tiled pitched roofs. Underneath the quad are a further three storeys with the lower level characterised by a series of semi-circular arches and the level above flanked by a colonnade of pointed arches. There is a white

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

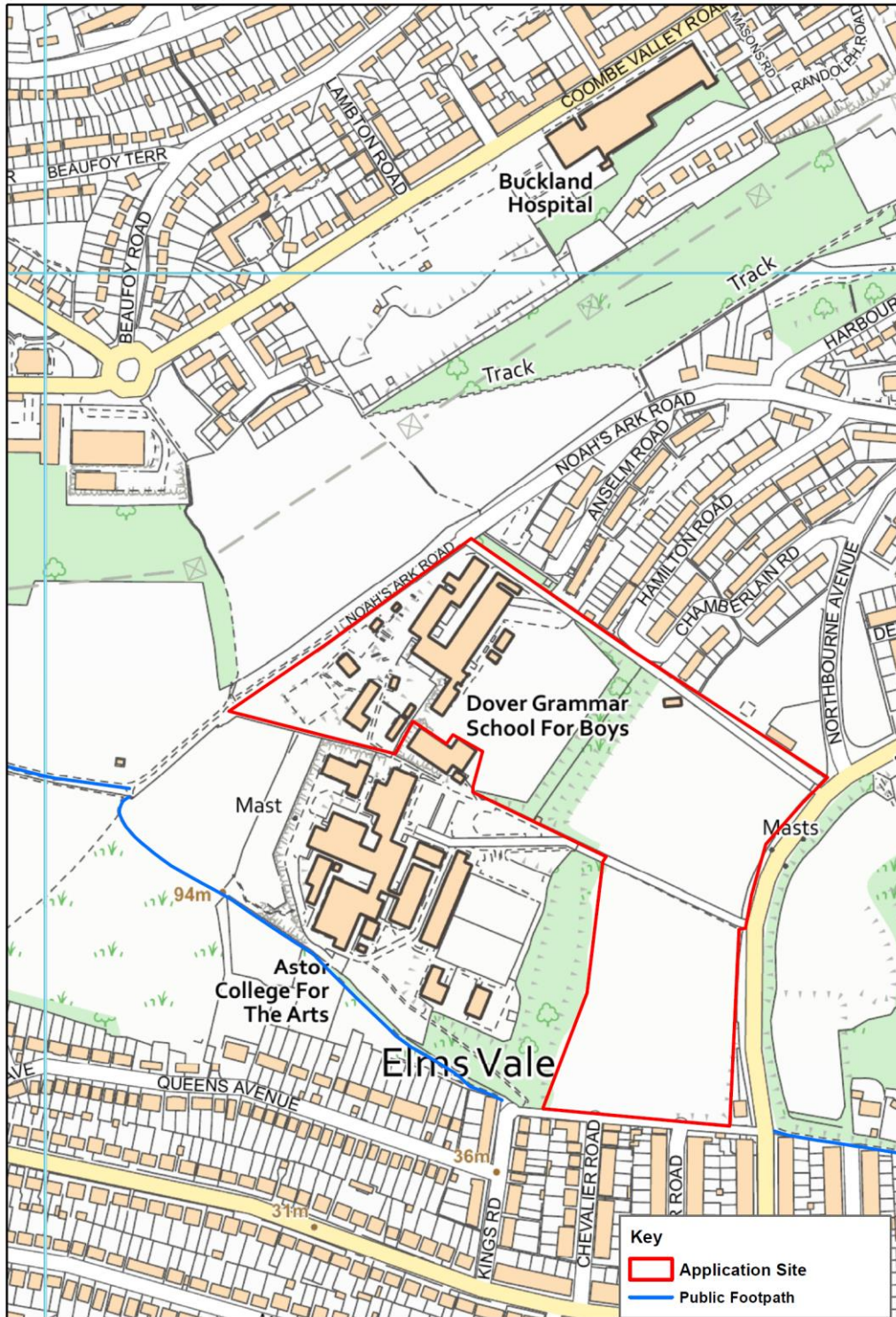
painted stair tower at the south eastern end which is very prominent and has the appearance of a castle wall or church tower. A second, shorter staircase tower is located at the north-western end of the school, erected in 2000/2001 to aid movement around the building, which incorporates the school motto and a checkerboard of tiles which are also visible on the gable ends of parts of the rest of the building. A detached gymnasium is located to the south-west of the original staircase tower and a number of mobile classrooms are sited within the school grounds, both on the edge of the upper playing field and to the south-west of the main school.

3. To the south-west of the Grammar School is Astor College a co-educational secondary school and beyond this an area of residential development. To the north-west the site is also bounded by residential development, whilst to the north-west, beyond Noah's Ark Road, is an area of open space designated as a local nature reserve – 'Whinless Down and Long Wood' Local Wildlife Site (LWS). The school lies wholly within the designated settlement policy boundary of the Local Plan and the playing fields and Leney's Field are covered by the 'existing open space' designation.
4. Vehicular access to the school is from Noah's Ark Road, where there are access controlled gates. There is an internal access road within the site along the north-east edge of the grounds, which links to a maintenance gate accessed from Astor Avenue by the lower playing field. Pedestrian access can be gained from both Noah's Ark Road and Astor Avenue. The vehicular access provides entry to an area of on-site parking predominantly located along the north-west edge of the site. There is current provision for 63 cars on site and 2 minibus spaces. An additional area of student and visitor parking is located outside of the main school grounds, just to the north of the site behind properties on Anselm Road, which is also accessed from Noah's Ark Road.
5. The school has a 4 Form Entry with a published admission number (PAN) of 860; 600 pupils for years 7-11 and 260 for the sixth form. There are 62 full time equivalent staff.

Item D1

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

General Location Plan



© Crown Copyright and database right 2019. Ordnance Survey 100019238

Item D1

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

Proposed Site Layout Plan



Item D1

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

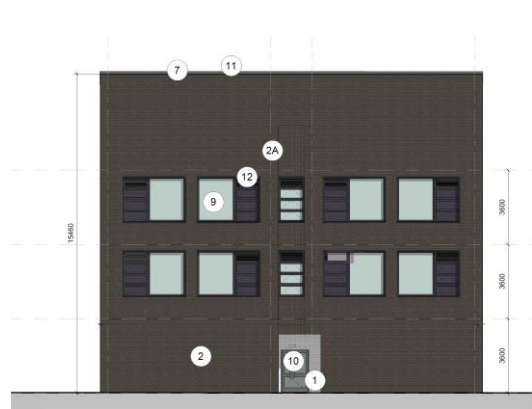
Proposed Elevations



East Elevation



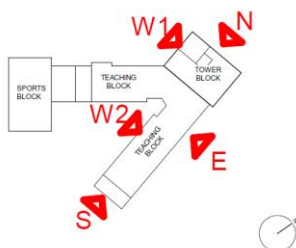
North Elevation



South Elevation



West 2 Elevation



Item D1

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

Proposed Elevations



North West Elevation



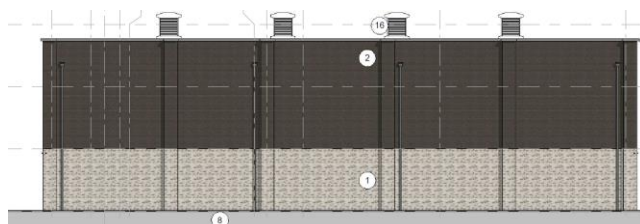
South East Elevation



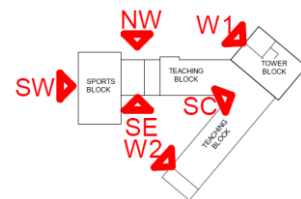
West 1 Elevation



South Courtyard Elevation



South West Elevation



Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

Recent Site History

6. The recent planning history for the site relates mainly to the provision of or retention of the mobile classrooms on site, along with permission for improvements to the external security fencing and access on site. In 2015 permission was given for a new sports hall, changing rooms and additional on-site parking, but this sports hall has not been constructed.

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 nationally have been selected to have at least one of their buildings (or blocks) rebuilt or refurbished, and this includes Dover Grammar School for Boys. Subsequent meetings have established that although it has been highlighted that there should be a 'like for like' replacement of teaching facilities, the current school building is considered unsuitable by the PSBP programme to be refurbished meaning a new school is required.

Proposal

9. The application seeks approval for the demolition of the existing school buildings, the removal of all temporary classrooms from site along with the old gymnasium and their replacement with a new part three and part four storey school, with an attached sports hall. In order for the school to operate whilst the new school is being built the proposed new building would be sited on the upper playing field. The school would decant into this upon completion, following which the existing school would be demolished. The proposed new school would have a roughly inverted V-shaped footprint which would form the main teaching block, with the sports hall located at the south-western end, and a courtyard would be created in between the two wings. Due to the change in levels across the site the main visitor and staff entrance from the school's access from Noah's Ark Road would enter at second floor level across a bridge link. The reception and staff offices would be located on this second floor, whilst first floor and ground floor levels would provide the teaching spaces. The small section of the building which would be four storeys in height would be located at the northern point of the new school where the main hall would be located.
10. The primary pupil entrance would be at ground floor level on the south-eastern side of the building. The majority of children currently enter the site from Astor Avenue as this is where the bus route runs, therefore the proposed pupil entrance would be provided to

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

facilitate this flow of pupils. Improvements would be made to the internal route through the school from Astor Avenue, with a ramped walkway with steps being provided for access between the lower field and the new school down the steep embankment. The attached sports hall would provide 4 sports courts and a new 2 court MUGA would be provided just to the south-east of the hall which would be enclosed by 3m high fencing. No floodlighting is proposed for the MUGA. In order to address the loss of the upper sports field, Leney's Field would be regraded and drained to provide football and rugby pitches to the required Sport England standard. There would be no access control or fencing provided to this area, maintaining the current situation.

11. The school would have a modern design with features included to replicate the existing school, including a taller 'tower' feature at the northern end of the site. The three storey elements would be book-ended by slightly taller elements constructed with different materials to break up the façade and provide definition to the design. There would be an element of full height glazing on the southern-eastern elevation and a mixture of dark and light grey brickwork. An asymmetric roof design would provide an additional feature to the building. A number of features of the original school, referred to as 'legacy items', would be moved to the new building, including two stained glass windows, the honour boards and the large organ from the main hall.
12. The proposed new school would accommodate community use, both for sports facilities and use by the Combined Cadet Force (CCF). There would be controlled access to the main school to allow use of a classroom and activity studio for the CCF and the internal sports hall and changing rooms. The changing rooms would also be accessible from outside in association with use of the external sports facilities. Community use of the main hall would also be provided.
13. Upon completion of the new school, the existing school would be demolished and this area would be remodelled to provide a new parking area and landscaped setting for the new building. There would be a slight uplift in parking provision on site of 4 spaces, and there would be provision for two electric vehicle charging spaces.
14. Amended plans were submitted in early October, following dialogue with Dover District Council and an Independent Design Review Panel. The amendments include the removal of the proposed cladding to the 'tower' element and the use of an all-masonry exterior with a simpler palette of materials; the slightly amended design of the focal 'tower' in order to create more impact; enhancements to the entrance and reception area to create more light through the provision of a roof light; and the provision of a biodiverse green roof on the majority of all flat roof areas of the scheme. A number of detailed technical reports have been submitted in support of the application including a Heritage Assessment, Flood Risk Assessment, Transport Statement, Drainage Statement, Contamination Report, Agronomist Report (for Leney's Field), Archaeological Desk Based Assessment, Ecological Impact Assessment and Habitat Reports.

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

Planning Policy

15. 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 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 (para 109);
- That the creation of high quality places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities (para 124);
- That access to high quality open spaces and opportunities for sport and recreation are important in their contribution to health and well-being, and therefore that existing open space, sports and recreation facilities should not be built on unless the loss would be replaced by equivalent or better provision in terms of quantity and quality (para 96,97);
- That in determining applications account should be taken of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses; the positive contribution that conservation of heritage assets can make to sustainable communities; and the desirability of new development making a positive contribution to local character and distinctiveness (para 192);
- That the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application; and that a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset (para 197).

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,*

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

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, 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 **Dover Core Strategy (adopted 24th February 2010)**

Policy CP1 Settlement Hierarchy: The location and scale of development in the District must comply with the settlement hierarchy. The hierarchy should also be used by infrastructure providers to inform decisions about the provision of their services. Dover is identified as the top of the hierarchy, being a Secondary Regional Centre and the ‘major focus for development in the District, suitable for the largest scale development’.

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

- Policy CP5 Sustainable Construction Standards:** New non-residential development over 1,000 square metres gross floorspace permitted after adoption of the strategy should meet BREEAM very good standards (or any future equivalent). Where it can be demonstrated that a development is unable to meet these standards, permission will only be granted if the applicant makes provision for compensatory energy and water savings elsewhere in the District. For developments of 1,000 square metres or less gross floorspace, the Council will encourage proposals to incorporate energy and water efficiency measures.
- Policy DM1 Settlement Boundaries:** Development will not be permitted on land outside the urban boundaries and rural settlement confines as shown on the settlement maps unless specifically justified by other development plan policies, or it functionally requires such a location, or it is ancillary to existing development or uses.
- Policy DM13 Parking Provision:** Provision for parking should be a design-led process based upon characteristics of the site, the locality, the nature of the proposed development and its design objectives. Provision for non-residential development should be informed by Kent County Council Guidance SPG4 (Kent Vehicle Parking Standards, July 2006 which allows for a maximum provision of 1 space per member of staff plus 10%), or any successor.
- Policy DM16 Landscape Character:** Development that would harm the character of the landscape, as identified through the process of landscape character assessment will only be permitted if (i) it is in accordance with allocations made in Development Plan Documents and incorporates any necessary avoidance and mitigation measures; or (ii) it can be sited to avoid to reduce the harm and/or incorporate design measures to mitigate the impacts to an acceptable level.
- Policy DM17 Groundwater Source Protection:** Within Groundwater Source Protection Zones the policy sets out what would and would not be allowed in order to safeguard against possible contamination.
- Policy DM25 Open Space:** Proposals for development that would result in the loss of open space would not be permitted unless - there is no identified deficiency in public open space (quantitative or qualitative); where there is a deficiency the site is incapable of contributing to making it good; where there is a deficiency and the site is capable of contributing to making it good, a replacement area with at least the same qualities and equivalent community benefit can be made available; and in the case of a school site the development is for education purposes.

Item D1

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

- (iv) The new **District Local Plan 2014-2037**. The Council is in the process of preparing a new District Local Plan to cover the period 2014-2037, which will set out key policies for the District. The emerging Local Plan is not due to be adopted until 2022, therefore it is at a very early stage and as such does not carry any material weight.

Consultations

16. **Dover District Council** raise no objection subject to the imposition of conditions to address the full recording of the existing building, including a photographic record, prior to demolition; the submission for approval of architectural details including roof parapet, window and door openings and reveals and external materials to be agreed in consultation with Dover District Council; no plant or machinery to be installed on the roof without prior agreement with the County Planning Authority; the provision and retention of the open space and sports facilities as required by Sport England; a scheme for the ongoing maintenance and management of Leney's Field to ensure public access doesn't undermine its role as a playing field; the retention of trees and implementation of the landscaping strategy; archaeological investigation; details of external lighting, hours of use and level of illumination and ongoing control over any new lighting; appropriate mitigation in relation to ecological and habitat surveys; the incorporation of energy saving measures including some renewables, and at least one electric vehicle charging point (and their long term retention and monitoring); the building to meet BREEAM very good standard; a construction management plan; and investigation and mitigation of contamination and ground conditions.

Dover Town Council has not provided any comments on the application.

KCC Highways and Transportation Officer raises no objection to the application subject to the imposition of conditions requiring the submission of a Demolition and Construction Management Plan; a revised School Travel Plan; the provision and permanent retention of the approved vehicle parking and cycle spaces within 3 months of the demolition of the original school building; that the car and cycle parking be made available for community use in association with the community use of the sports facilities outside of school hours; and that the new access gates from the existing driveway serving Astor College are only used for maintenance purposes, and not for access to the school by staff or pupils at drop off and pick up times.

KCC Biodiversity Officer raises no objection to the application subject to the imposition of conditions to secure recommendations in the Ecological Impact Assessment for the protection, mitigation and compensation for impacts to bats and their roosts; that mitigation measures for badgers are carried out in accordance with the recommendations of the Ecological Impact Assessment; that safeguarding measures for the Local Wildlife Site are undertaken in accordance with the Ecological Impact Assessment; and that details are submitted within 6 months of any decision to secure ecological enhancement measures. In addition, an informative is proposed in relation to nesting and breeding birds in accordance with the Wildlife and Countryside Act. Finally, if the applicant has not been able to finalise details of an agreed reptile receptor site prior to the committee meeting a pre-commencement condition is also required to agree the receptor site before works can commence on site.

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

KCC Conservation Officer's views are summarised as follows: Replacement of the existing school with a modern, functional building at a lower level of the slope would destroy the landscape value and landmark quality of the existing structure. The school was designed to be seen and it is clearly visible from the Western Heights Fort, from Dover Castle and from many other key positions in the town. Its loss would have a minor, but measurable, negative effect on the settings of these key assets. A less tangible impact would be experienced as a result of the building's present community value and the strong sense of loss that would be felt by many residents of the area. The proposed development does not meet any of the three key elements of paragraph 192 of the NPPF, as it will result in the total loss to the community of a heritage asset and will make a negative contribution to local character and distinctiveness.

Paragraph 197 of the NPPF relates specifically to non-designated heritage assets and requires the scale of harm or loss, and the significance of the asset, to be taken into account. In this case additional research is required to properly assess the significance of the heritage asset, in the form of a programme of historic building recording to Historic England Level 3, given that the scale of harm is high, as its demolition will result in the total loss of the asset.

The information submitted as part of the current proposal is insufficient to support the conclusions drawn in the Heritage Statement that the existing building is not significant on a regional or national level and is not of listable quality. In order for the application to be determined correctly the building's heritage value must be confirmed, and the views of Historic England should be sought to see if the building is of listable quality.

KCC County Archaeological Officer states that given the site's archaeological potential, further archaeological work is warranted at the site, but is content that such works could be undertaken following determination of the planning application. As such no objection is raised subject to the imposition of a condition requiring a programme of archaeological works and that no development should take place until a programme of building recording for the three sets of WW2 air-raid shelters is secured.

Environment Agency (Kent Area) raise no objection subject to the imposition of a condition to ensure that any contamination found on site which has not been previously identified, is addressed through a remediation strategy to be agreed by the County Planning Authority; and that there be no infiltration of surface water into the ground without permission of the County Planning Authority. In addition informatives in relation to the demolition of the existing school and removal of waste materials from site are proposed.

KCC Flood and Water Management Officer raises no objection subject to the submission of a detailed sustainable surface water drainage scheme prior to the commencement of development; and that no building shall be occupied until a verification report pertaining to the sustainable drainage system has been submitted to and approved by the County Planning Authority.

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

Sport England raise no objection to the proposal subject to the imposition of a condition to ensure that Leney's Field is bought back into use prior to the first occupation of the new school and that the land shall thereafter be retained and maintained for playing field use; and that prior to the first occupation of the new school, a community use scheme be submitted to and approved by the County Planning Authority to secure the community use of the indoor and outdoor sports facilities, car parking and changing facilities.

KCC Transport Planner Schools has commented on the submitted draft travel plan, which requires some additional information to be submitted. A condition requiring an updated School Travel Plan is recommended.

Local Member

17. The local County Members for Dover Town, Mrs Pauline Beresford and Mr Nigel Collor were notified of the application. No written comments have been received.

Publicity

18. The application was publicised by the posting of four site notices, an advertisement in a local newspaper, and the individual notification of 215 nearby properties. Following the submission of amended plans all neighbours and consultees were reconsulted.

Representations

19. In response to the publicity, 4 letters have been received objecting to the application, a further 3 letters commenting on the application and 25 letters of support. The key points raised can be summarised as follows:

Support

- Fully support the proposals to provide pupils and staff with a learning and working environment fit for purpose;
- Existing building no longer suitable for modern teaching and retaining it would put students at a disadvantage;
- Whilst the current building is beautiful and full of character it is unable to support the full potential of its students whereas the new build has that as its key focus;
- Current classrooms are below minimum size, heating is unreliable, classrooms leak, and there is a lack of modern resources for PE and sport;
- There is a degree of sadness that the scheme will require the demolition of the quirky yet decrepit set of buildings, but consider the benefits of the modern and attractive proposed facilities will make it a school fit for teaching;
- Wonderful opportunity for students at Dover Grammar School for Boys and the surrounding communities;
- Indoor sports facilities are among the poorest in the country and therefore put a strain on the playing fields which are then over-used – the need for improved sports facilities are required and would benefit the school and the community;

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

- The current school and sports facilities are inevitably a limiting factor on attainment;
- Plans will give students a chance to excel both academically and physically and equip them for the future;
- Design of new school impressive and will give students and staff a strong sense of pride;
- Plans aim to maintain some of the original features of the existing school which will maintain its historical past;
- Proposals have been designed sympathetically and been rationally thought through;
- Extra space designed in the new school for learning support is a big benefit;
- Encouraging to see the sports facilities proposed which would be excellent for local community sport groups;
- The redevelopment of Leney's field for sports is long overdue;
- Existing school is expensive to maintain and was designed for the priorities and needs of an earlier era;
- Even if the existing school were refurbished it would not deliver facilities to meet modern standards;
- The disruption caused to the boys teaching by a refurbishment of the existing school would be a major concern for parents;
- Old Pharosians' Association (a registered charity whose members are former pupils and staff of Dover Grammar School for Boys) fully support the proposals to rebuild the school on the upper sports field;
- The existing school has been in disrepair for over 30 years;
- This project should have happened years ago;
- Current school is very inaccessible and anyone with mobility issues is confined to a small area of the school, making it difficult for staff, students, parents and visitors;
- The proposed new school would provide the new head teacher an opportunity to ensure the school succeeds in the future;
- If this scheme doesn't happen now, fear that the school will not be able to continue too far into the future;
- The old building looks venerable from afar but it is a crumbling edifice – the new building would be just as impressive on the hill.

Comment

- The Dover Society (a community/amenity organisation in Dover) raise a mix of views as some of the older members of the group do not wish to see the original building demolished and would prefer the building to be renovated, but the younger members support the provision of a new school. All agree that the new facility would be of significant importance to the town and would, as a Society, therefore lean to support the application.
- Disappointing that a pitched roof design has not been proposed. The new high point of the building which is supposed to reflect the original tower should have a crenelated profile as the original does.
- Hope the original architects plans and drawings have been consulted in connection with the proposed demolition to identify any unknown underground utilities, asbestos etc.

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

- Query whether the applicants can be satisfied that the upper plateau would be stable for future foundations, especially given the reported subsidence of the existing school tower;
- Suggest more car parking should be provided to ensure visitors to the school park off Noah's Ark Road to ensure neighbours are inconvenienced as little as possible.

Objection

- Existing building is a non-designated heritage asset of local importance and should be retained;
- The proposed replacement building is a square box with no aesthetic merit and would be ugly like Astor College;
- If the building had been maintained properly it would have lasted longer;
- Existing school in disrepair due to lack of maintenance - if they can't look after what they've got why will they look after the new building;
- Would be better to carry out the remedial works required and keep the school, and build the sports hall that already has permission;
- Concerned over the impact of demolition on the wildlife at the school;
- The building in its current form has allowed wildlife to flourish - birds, bats, slow worms, badgers and lizards;
- There is a bigger picture to consider in terms of wildlife and our planet;
- Demolition and construction of new school will cause disruption and inconvenience to neighbouring properties;
- Problems such as increased noise pollution, dust ingress and invasion of privacy.

Discussion

20. In considering this proposal regard must be had to the Development Plan Policies outlined in paragraph 15 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.
21. This application is being reported for determination by the Planning Applications Committee due to the objections received as set out in paragraph 19 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 including heritage considerations; the siting and design of the new building and any impact on the wider area and residential amenity; loss of open space and provision of sports facilities; ecological matters; and any highway and transportation implications linked to the proposal.

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

Principle of Development and Education Need

22. 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 15 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.
23. The existing school has undergone structural inspections which have shown that there are a number of health and safety concerns relating to asbestos used in construction, water ingress and concrete structure defects. Detailed analysis was undertaken at the pre-application stage to assess whether there would be the possibility of delivering the much needed new accommodation without demolishing the existing school, however the Feasibility Study concluded that this was neither feasible or viable within the requirements of the Priority Schools Building Programme. As a result a proposed new school was the preferred option for the Department for Education rather than refurbishment for a number of reasons, including:
- To provide the school with a new purpose-built facility to current design and space standards for pupils and staff;
 - A new building more flexible and adaptable to accommodate future changes to curriculum;
 - Space to accommodate expansion, if needed, at a later date;
 - A new facility will attract future pupils and parents, helping to ensure the future viability of the school;
 - Design life of 40-60 years in line with Department for Educations Output Specification;
 - Reduced energy consumption and improved carbon footprint;
 - Reduced ongoing maintenance costs;
 - Focuses development spend into one area;
 - The school would not be spread out across the site;
 - Preservation of the school identity on site;
 - Opportunity to create a landmark school;
 - Existing parking provision maintained;
 - Lowest loss of open space land provision;
 - Most cost effective development options.
24. The feasibility study and the poor state of repair of the existing school has therefore resulted in the proposal for a new school building, however consideration has also been given to whether the existing building could be retained for an alternative use given its local designation as a non-designated heritage asset.
25. The viability of an alternative use has been assessed by a company of Chartered Surveyors appointed by the Department for Education, who considered whether a residential use would be viable. Commercial, retail and industrial uses were not considered appropriate given the site's location outside of the main town and built on a hill; in addition residential development would be the most valuable option. However,

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

even for a residential scheme the viability assessment showed that substantial deficits would be incurred for any developer (even assuming 0% affordable housing), there being little market demand for refurbished buildings of this scale and in this location, and as such would be mathematically considered as non-viable. Retaining the building for an alternative use would also present significant operational difficulties for the proposed new school in terms of access, security and safeguarding, and an alternative area would be needed for car parking and circulation space, which would result in more outdoor space for the school being lost.

26. There is a recognised support for the need for new school facilities at this site, especially given the funding being proposed through the PSBP scheme, and it is important to provide such facilities in the vicinity of the existing school. It is therefore considered that the need for new school facilities has been established, and that they should be provided on this existing education site.

Heritage Issues for Loss of the Existing Building

27. The main objections to the scheme that have been received centre on the loss of the original school building which is not a listed building, but as stated above, is considered to be a non-designated heritage asset, which is a prominent and landmark building. In light of this, the application was supported by the submission of a Heritage Statement. The Heritage Statement was produced by Mott MacDonald Ltd on behalf of the Education and Skills Funding Agency and formed part of the feasibility study for the project at the detailed design stage. The Heritage Assessment includes a Statement of Significance which states:

“The building’s heritage significance lies in its evidential, aesthetic and communal value, as a very late example of Victorian/Edwardian style medievalism and a striking local landmark. The architectural similarities with Dover Castle and the Fort at Western Heights demonstrate the idea to associate the school with other regional and national landmarks. However, the building exhibits architecture influenced by aesthetic principles, and not thorough historic architectural knowledge. The building is not a particularly good example of medievalism and, built in the 1930’s, is a particularly late example of this style. Its position on high ground, strong architectural style, association with a locally prominent person (Fred Whitehouse, the first headmaster of the school), the fact it has retained its intended use, and its communal association for generations of pupils in the local area has resulted in its being of high local significance, however, this does not extend to a regional or national scale and is not of listable quality.”

28. As set out in the Consultation section (paragraph 16) the County Council’s Conservation Officer considers that there is insufficient information on which to arrive at this view, without the provision of a programme of historic building recording (to Historic England Level 3 – an analytical record which includes drawings, photographs and a written account). This would provide a record of the historic fabric of the building upon which a decision could be made regarding its suitability to be listed. He also recommended that Historic England’s views should be sought to establish whether the building should be listed. Contact has been made with Historic England who have advised that a request

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

by members of the public has already been made to them for an assessment of the building's suitability for listing. They have confirmed the process they are now undertaking which is set out below:

- When a request is made to them they make an initial assessment about whether there is enough information for them to look at the request or not.
 - If there is enough information they would make one of two decisions - whether it is unlikely to be listable, or if there is a possibility the building is listable.
 - If they decide the latter they would then proceed to the full assessment and would write to all concerned to advise they are undertaking the full assessment which could take a couple of months.
 - If they take the view that they think it is unlikely to be listable Historic England will write a recommendation to this effect which gets passed to the Department for Culture, Media and Sport and the final decision is made by them.
29. Historic England have determined that they have enough information to consider the request and are at the stage where they are making a decision about whether the building is of insufficient heritage quality to be listed or whether a full assessment is required. In the light of the objections received from the Conservation Officer and other members of the public, a decision from Historic England would be welcomed as it would establish definitively whether there would be any overriding objection to the demolition on heritage grounds.
30. Notwithstanding this matter which will be assessed by Historic England, paragraph 197 of the NPPF states that a balanced judgement should be made as to whether the significance of the asset outweighs other planning and public benefits to the scheme. Should the decision by Historic England be that the building is not of listable quality, this assessment therefore needs to be made. There are no local policies for the protection of non-designated heritage assets. The proposal is for the demolition of the original school which would, by its very nature, result in substantial harm to the local heritage asset. However, this loss at the local level needs to be weighed against the educational needs of Dover Grammar School for Boys, which is the sole function of the building. If the school is no longer fit for purpose and doesn't provide the pupils and staff with the necessary modern-day facilities and requirements then it is failing in its core purpose. The assessments undertaken have demonstrated that it would not be financially viable to refurbish the existing school buildings, but more importantly even if it were refurbished it would still fail to deliver the modern education facilities that are required and expected for sustainable communities. The reuse of the school buildings for residential purposes have also been demonstrated to be unviable financially, but moreover if the existing school is retained for an alternative use, then the access and parking provision for the school would have to be provided elsewhere on site and this would inevitably result in the loss of more of the outdoor space.
31. The fact the school has been selected as part of the Government's Priority School Building Programme (PSBP) means that the quality of the existing buildings are substandard. This programme targets funding to those schools which are in the worst condition in the Country. The District Council's Core Strategy highlights the importance of having sufficient school spaces for pupils within the district to ensure that they receive

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

the highest education standard possible and further acknowledges the need for some schools within Dover to rejuvenate and in some cases be replaced. NPPF paragraph 94 makes it clear that great weight should be given to proposals which widen choice in education and provide quality educational environments, and the Planning Policy Statement for Schools Development states that the creation of state funded schools is strongly in the national interest and that decision makers should support that objective and apply a presumption in favour of development. Taken together these amount to a very clear message that proposals such as this should be supported. Whilst it would be regrettable to lose the building given its local importance, it is considered that it is necessary to provide the education facilities required for Dover Grammar School for Boys and therefore my balanced judgement is that the demolition of the school and its replacement is acceptable in principle in accordance with paragraphs 94 and 197 of the NPPF, provided the building is not considered listable by Historic England. We have been advised that a decision by Historic England (or the Department of Culture Media and Sport) is unlikely to reach us before the Planning Application Committee therefore the recommendation to Members would be that permission be granted subject to Historic England determining that the buildings are not of listable quality.

Siting and Design of New Building

32. The proposed replacement building would be sited on the upper field as described in the proposal section above and has been designed to create flexible and functional spaces, which would provide for the educational needs of all users of the site and create an innovative and inspiring environment. The current building is an important landmark in the town, but due to the logistics of building the new school whilst using the existing one, the proposed school cannot be sited in the same position and as such would have to be sited at a lower level. As a result it would be slightly less visible than the existing school when viewed from a distance, but it would still be prominent against the hillside and the choice of materials, with a strong colour contrast, would enhance the appearance of the school and make it stand out from distant views. Once the existing school has been demolished and the site landscaping completed, the new school would benefit from an improved backdrop which would also enhance the overall appearance. The building has been designed to be multi-sided, which would ensure that the appearance of the school would be to a high standard regardless of the viewpoint. In order not to detract from this design, and its setting against the backdrop, Dover District Council have requested a condition be imposed restricting the positioning of any roof plant on the roof other than that shown on the submitted drawings. Those elements that are included relate to ventilation extracts from the science labs on the second floor, soil vent pipes from the toilets and condensing units. In these cases the elements on the roof are either located tight up against the roof parapet so as not to be visible, or in the case of the soil pipes have a minimal projection which would be obscured once the green roof has established itself. The wind catchers for the main hall and sports hall would project above the roof slope in a location where they wouldn't be wholly obscured as the other items above, but they are required for ventilation for these spaces, and would not be located on the primary flat roof element of the building. Provided no additional plant is permitted on the roof, as proposed by the suggested condition, it is considered that these wind catchers would not detract from the overall appearance of the building and would be acceptable.

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

33. In its location on the upper field, the visual impact of the school on surrounding residential properties would be reduced from its prominent current location. The building would be set away from the site boundaries as a result of the existing access road which runs along the northern boundary of the site, thereby keeping the built form away from the closest residential properties which are those in Anselm Road, Hamilton Road and Chamberlain Road. There is existing mature landscaping along this boundary as well, which combined with the topography of the site would prevent any direct views into the residential properties and would therefore not result in any loss of privacy. Distances of more than 40m between the new school and the residential properties to the north would ensure any impact on the residential amenity of these residents is not adversely affected. Furthermore, the new pedestrian link from Astor Avenue via the proposed steps and walkway up the bank between the lower and upper fields would direct the pupils away from the access road and this boundary closest to the residential properties, and directly across to the primary pupil access.
34. In terms of the design of the school itself, it is considered that this has been produced to a modern high standard whilst having reference to the design of the original school it would replace. A modern tower feature would be included to reference the existing stair tower. Whilst it has been suggested in the representations received that this should have a similar crenelated style as the original, it is considered that replicating it in such detail would be inappropriate and compromise the modern design of the school as a whole. The height and material choice of this element gives the impression of the tower, which along with the location of the school emblem would create the visual effect. The full height glazing element for the dining hall (which has a void over) would contrast with the brick colours for the rest of this elevation and internally would provide views across Dover to the Castle and the port.
35. Elements of the existing school fabric have been designated to be removed and would be included in the proposed new school, to ensure the continuity of the historic legacy of the school. This would include the pipe organ which would be housed on the third floor of the new school by the main hall, the 'fiat lux Pharos' stained glass window from the current library which would be situated in the new reception area and the large stained glass window currently located on the existing stairs to the library which would be hung above the focal staircase at second floor level.
36. A hard surfaced courtyard would be created between the two wings of the proposed school and the MUGA would be located to the south of this. The layout of the classrooms internally would result in a uniform window appearance to the building wings. From the northern side of the site, the main entrance and approach from Noah's Ark Road has also been emphasised through the design. As amended, the main entrance would be enhanced with more light from a proposed roof light above the reception and once inside there would be views across the dining room atrium to Dover Castle and the port. A bridge across from the parking area, which would be accessed from Noah's Ark Road, would lead straight to the reception area and provide access for all staff, parents and visitors as well as late students. The majority of the flat roof elements of the building are now proposed to be planted with a biodiverse green roof (outlined further in the landscape section in paragraph 51). Once demolished the

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

footprint of the original school would be landscaped and the existing vehicle entrance (and gates which are to remain) would lead to areas of on-site car parking.

37. It is considered that the proposed design and siting of the school would meet the aims of Policy DM16 of the Core Strategy in that it would respond positively to the character and appearance of the locality and it would retain the character of a prominent building on the elevated parts of the site. The building would be comfortably accommodated within the site, such that it would not result in any overdevelopment of the site and would be sufficiently well separated from the boundaries. The proposal would be constructed of materials which would provide a contemporary appearance in keeping with the bespoke, modern design. It is therefore considered to comply with the local planning guidance as well as section 12 of the NPPF which states that good design is a key aspect of sustainable development.

Sports Provision and Loss of Open Space

38. The proposed development would be sited on the 'upper' playing field which would result in the loss of this existing playing field and sports facility. This part of the site is classified as 'Existing Open Space' in the proposals map for Dover and as such is covered by Policy DM25. As set out in paragraph 15, Policy DM25 states that proposals for development which would result in the loss of open space will not be permitted unless in the case of a school site the development is for education purposes. Given that this proposal relates directly to the provision of new educational facilities it is considered that it would meet this exception to Policy DM25. Notwithstanding this, the scheme has been designed to minimise the amount of open space that would be lost and by siting the new school on the upper field the built form would be kept on the periphery of the wider open space designation. Mitigation for the loss of the open space would also be provided through the development of the four court sports hall, MUGA and the enhancements to Leney's Field. Currently the school has a very aged and dilapidated sports hall and no external court provision, and both aspects of the proposed new school would be available for community use. Given the proposed new facilities, it is considered that the scheme would accord with the guidance of the NPPF as well, which states that existing open space, sports and recreation facilities should not be built on unless the loss would be replaced by equivalent or better provision in terms of quantity and quality.
39. Sport England fundamentally oppose development which would result in the loss of, or would prejudice the use of, all or any part of a playing field in all but exceptional cases whether the land is in public, private or educational use. Policy P1 of the Sport England Policy Statement sets out the exceptions to their general presumption against the loss of playing fields, and these are:
- E1 A carefully quantified and documented assessment of current and future needs has demonstrated to the satisfaction of Sport England that there is an excess of playing field provision in the catchment, and the site has no special significance to the interests of sport.

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

- E2 The proposed development is ancillary to the principal use of the site as a playing field or playing fields and does not affect the quantity or quality of pitches or adversely affect their use.
- E3 The proposed development affects only land incapable of forming or forming part of a playing pitch, and does not result in the loss of or inability to make use of any playing pitch (including the maintenance of adequate safety margins), a reduction in the size of the playing areas of any playing pitch or the loss of any other sporting/ancillary facilities on the site.
- E4 The playing field or playing fields, which would be lost as a result of the proposed development, would be replaced by a playing field or playing fields of an equivalent or better quality and of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to commencement of development.
- E5 The proposed development is for an indoor or outdoor sports facilities, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing field or playing fields.
40. Sport England were consulted on the application and advise that in their view the application relates to the loss of existing playing fields and/or the provision of replacement playing fields, and therefore the application has been considered against exception E4 of the above policy. Although they acknowledge that Leney's Field has not been marked out as playing fields since 2003, they would still meet the formal definition of a playing field and thus are considered as such by Sport England. However, they also recognise that it is not useable as a playing field, in that it would require significant work, beyond simply mowing the grass and marking out pitches to allow formal sport to continue there. A Quality Assessment Report (by TGMS) was submitted with the planning application which summarised the scope of works to the field which would ensure that the replacement facility would meet Sport England's performance quality standards and could, in fact, be provided to a better standard than the upper playing field.
41. Sport England have confirmed that the proposals, with its redevelopment of Leney's Field for playing fields and the provision of the new sports hall and MUGA would be of sufficient 'development to sport' to outweigh the loss of the upper playing field and would therefore meet the exception policy E4. Conditions have been requested to ensure that the scheme for bringing Leney's Field back into use would be carried out in accordance with the TGMS' Quality Assessment Report and provided prior to the first occupation of the new school, and that thereafter the land be maintained and made available for sport. In addition, a condition requiring both the indoor and outdoor sports facilities, changing facilities and car parking to be made available for community use in accordance with a Community Use Agreement (to be submitted prior to the first occupation of the school) is also requested. Dover District Council have also requested a condition to ensure that public access to Leney's Field would not affect the ability to use the field for sports provision (given that it would not be fenced or enclosed), and this could be achieved through a scheme for the ongoing maintenance and management of

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

the site, to be agreed by the County Planning Authority prior to occupation of the new school. In the light of these comments it is considered that the proposed development would be in accordance with Sport England's Planning Policy.

Access, Parking and Highways

42. 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. No changes are proposed to the existing vehicular access arrangements for the site, with the primary vehicle access being taken from Noah's Ark Road, and the access gates on Astor Avenue only being used for service vehicles and maintenance purposes. The internal roads within the site would be reconfigured to align with the new building, and pedestrian access would still be provided from both Astor Avenue and Noah's Ark Road.
43. A new internal loop road would be provided on the site of the existing building, once demolished, leading to the revised on-site parking layout, which would see an uplift of 4 parking spaces over the original provision. The existing informal parking area provided off site would be retained under the new scheme, as per the existing situation, providing 17 parking spaces for sixth form students. In total 67 car parking spaces would be provided on site: 20 in the proposed new main car park, including 5 disabled spaces, and 43 in the existing two areas of hardstanding which would be retained. Four further spaces located to the west of the new car park would also be retained. Dover District Council have requested the provision of at least one vehicle charging point to be provided within the school site. The applicants were informed of this request and have agreed to provide 2 active electric vehicle charging points on site with infrastructure in place for a further 3 spaces for the future. No dedicated motor bike parking spaces are allocated at present but should a demand arise for these there would be sufficient space on site to accommodate them in the future. A total of 36 cycle parking spaces are proposed on site, to the west of the proposed main car park. Space on site to accommodate a further 84 bicycles is allocated to the east of the proposed new building and further provision to the west of the main car park (should they be required) which would represent a significant increase over the existing provision.
44. A new set of double maintenance gates would be fitted to the boundary fence to the south-west of the proposed MUGA onto the access drive for Astor College. The agent has clarified that these would be for maintenance purposes only and not used for access at start and drop off times for staff and pupils. Delivery and service vehicles would continue to access the site from both Noah's Ark Road and Astor Avenue, as per the existing situation. The refuse store would be located to the east of the proposed school building next to the internal access road, and a turning head for emergency vehicles is also proposed in this area. Vehicle swept path analysis plans accompanied the application demonstrating that a fire engine could manoeuvre within the site.
45. A Construction Method Statement has been submitted which sets out the logistics for carrying out the construction and demolition of the school, should planning permission be given. This advises that articulated lorries would access the site from Astor Avenue

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

whilst all other construction vehicles would enter from Noah's Ark Road. Furthermore it states that deliveries would be timed to be outside of school drop off and pick up times and that there would be wheel wash facilities on site.

46. The Highways and Transportation Officer has considered the information and plans submitted and confirms that given there would be no change to the number of staff and pupils on site, or the access arrangements for the school, there is no objection to the scheme on highway grounds. However a number of conditions are proposed which include ensuring the on site car and cycle parking would be provided within 3 months of the demolition of the original school, and thereafter maintained; that the Construction Method Statement be implemented as submitted; that the on site vehicle and cycle parking be made available for community use outside of school hours in association with use of the facilities on site; that the School Travel Plan be updated on the County Council's 'Jambusters' Scheme; and a condition to ensure that the proposed new maintenance gates on the Astor College service road are not used for pupil or staff access to the school.
47. The scheme is considered to be in accordance with Local Planning Policy DM13 and Kent's Parking Policy in that the number of parking spaces on site would accord with the maximum standards given, and would accord with the NPPF in that the scheme would not result in any 'severe' highway impacts.

Flood Risk and Drainage

48. 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 education 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.
49. 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 report highlights that the site has unrestricted surface water connection to the existing public sewer on site. All existing surfaces on site would drain as existing and the foul drainage from the new building would drain into the existing sewer network, replacing the current school connection. The Flood and Water Management Team have advised they have no objection to the principles of the drainage scheme proposed in the report, but have requested the imposition of two conditions should planning permission be granted - to secure the submission of a detailed surface water drainage scheme prior to commencement of development, and the submission of a verification report relating to the drainage scheme prior to occupation of the new school.

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

Landscape and Trees

50. The application has been supported by the submission of detailed landscape masterplan drawings, an Arboricultural Impact Assessment and Tree Protection and Removal Plans. The tree plans and report indicate that the proposals would require the removal of one tree, an elder, located close to the internal access road close to Astor Avenue, and the selective removal of some trees within the woodland group located on the bank between the existing upper and lower playing fields. The remainder of the existing trees and woodland groups on site would be retained and enclosed by tree protection fencing. The report also highlights that 18 trees and 3 groups on the existing school site would have their root protection areas breached during the demolition process, but the protection of these trees could be further secured via the submission of an Arboricultural Method Statement if permission were granted.
51. The existing trees and hedges which mark the boundaries of the site would therefore on the whole be retained and the proposed landscape scheme would seek to further enhance the landscaping on the site and to reinforce the siting of the new school within the site, especially when viewed from distance against the hillside. Following the demolition of the existing school this part of the site would need extensive landscaping and retaining works to accommodate the change in levels across the site, and this has been designed with a series of terraces and a variety of retaining features surrounding the loop access road. The amended plans included a revision to the roof design to include a biodiverse green roof on the majority of the flat roof sections, following the Dover Design Review Panel. The green roof system would be a shallow, lightweight and low maintenance system that would support a diverse mix of native wildflowers and grasses, which would create a range of ecological habitats for wildlife. The proposed seedling and plug planting would establish an initial population, which would then over time be followed by natural colonisation as a result of wind dispersal or introduced by birds and other animals. The proposal being that eventually a balanced population of species would develop. A landscape scheme to secure the use of native species of planting appropriate for a school setting, along with plants suitable for bee pollination (including those for the proposed green roof), could also be secured via a condition. As such it is considered that the scheme would accord with the aims of Policy DM16 of the Core Strategy.

Archaeology

52. The application has been supported by an Archaeological Desk Based Assessment which confirms that the chalk down-land landscape upon which the site is located is generally rich in archaeological remains including finds of Neolithic and Bronze Age date. The KCC Archaeological Officer has considered the report and advises that whilst the construction of the terraces upon which the existing school and playing fields are built (formed by cut and fill excavation) would have had a significant impact on archaeological survival, it is likely that there will be areas within the site where archaeological remains might survive, unaffected by such terracing. In addition the Officer notes that the school buildings were requisitioned by the Royal Navy as a station for the WRNS during WW2 and the plans indicate the location of three sets of buried air raid shelters on the site. These shelters are of archaeological and historic interest and

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

where they survive could contain evidence of their use, potentially including graffiti by those who sheltered there.

53. Given the site's archaeological potential the Archaeological Officer recommends that further archaeological work is warranted on the site, but states that this could be undertaken following determination of the planning application, through the imposition of conditions. These would include a condition to secure a programme of archaeological works in accordance with a specification and timetable to be agreed with the County Planning Authority; and also a condition to secure a programme of building recording of the WW2 air raid shelters on the site to ensure these are properly examined and recorded.

Ecology

54. The application was supported by the submission of a Preliminary Ecological Appraisal, an Ecological Impact Assessment, Bat Report, Hazel Dormouse Report and Reptile Report, all of which have been considered by the County Council's Biodiversity Officer. The Reptile survey found a 'good' population of both common lizard and slow worms on site, predominantly on Leney's Field but also within the landscaped bank between the upper and lower playing fields and in a landscaped area to the east of the existing school buildings. The areas in which the reptiles have been found are all areas which would be lost or affected as part of the development, therefore there is a need to implement mitigation measures. The reptiles would need to be translocated to an alternative location off site and therefore a receptor site needs to be agreed. The County's Biodiversity Officer is satisfied with the proposed reptile trapping and methodology as set out in the Reptile Report but as details of the receptor site have not yet been finalised the suitability of the site and therefore the long term viability of the population cannot be guaranteed. As a result a pre-commencement condition has been suggested that would preclude any start of development on site before a suitable receptor site has been agreed in writing with the County Council.
55. The submitted bat report showed common pipistrelle bats emerging from the existing buildings on site and given that bats are a protected species, there is again a need to implement mitigation measures. A European Protected Species Mitigation (EPSM) licence would therefore be required to carry out the development due to the impacts upon roosting bats. 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 and as such they must consider whether it is likely that an EPSM licence from Natural England would be granted. The proposed mitigation measures proposed in the Ecological Impact Assessment (EIA) would include the removal of potential roost features by hand and under supervision by an experienced ecologist, the provision of bat boxes on nearby trees, and a sensitive lighting scheme reviewed by an experienced ecologist. The Biodiversity Officer's view is that the mitigation measures are adequate to maintain the favourable conservation status of bats on site, provided a condition is imposed on any planning permission to ensure the development is carried out in accordance with the EIA unless varied by a European Protected Species licence subsequently issued by Natural England.

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

56. An active badger sett was identified on site on the bank between the upper and lower playing fields. The proposed MUGA would be located within the recommended 30m exclusion zone for badger setts, however the sett is on a steep bank and the tunnels run away from the proposed MUGA. The Ecological Impact Assessment recommends that the construction of the MUGA be reviewed by an experienced Ecologist to ensure the badger sett would not be adversely affected and provided this is condition it is considered that there would be no significant impact on badgers. The site also has habitat features within it that would provide opportunities for breeding birds, therefore any works to vegetation should be carried out outside of the breeding bird season. If this isn't possible then the areas affected should be examined by an ecologist prior to work commencing and an informative advising the applicant of this is proposed, should permission be given.
57. Conditions are also proposed to secure the safeguarding of the woodland blocks on site with protective fencing in accordance with the EIA and one to secure details of the enhancement measures and management of biodiversity on site in accordance with the recommendations made in the Preliminary Ecological Appraisal. Subject to the imposition of such conditions, the County Biodiversity Officer raises no objection to the scheme, which it is considered could be carried out with suitable mitigation to ensure no protected species are harmed and would therefore accord with policy and guidance of the NPPF.

Noise and Construction

58. A Noise Impact Assessment was prepared to accompany the application, to assess the sites suitability for education use in respect of the impact of noise. 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. The report looked at a suitable ventilation strategy to achieve indoor ambient noise levels in accordance with Building Bulletin 93 (Acoustic Design of Schools) and the data was also used to outline suitable building orientations and layout for acoustics. Subject to the use of natural, hybrid and mechanical ventilation systems for teaching spaces, the report concludes that the site would be suitable for school development.
59. The site would retain its education use, and therefore ambient noise levels for residential properties would not be significantly different to that already experienced. The topography of the site and the distances between the proposed building and the site boundary, particularly to the north, would ensure that there would be no loss of amenity or overbearing impact from the new school on these residents. The relocation of the upper sports pitches to Leney's Field would in fact move the noise associated with the outdoor sports further away from the residential properties to the north.
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 Method Statement) and it is considered unnecessary to impose any additional controls on the development as part of the planning permission.

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

61. A Construction Method Statement (CMS) 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 CMS includes amongst other matters that no traffic movements, including deliveries, should occur 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. 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 has also been set out in the CMS. The submitted Construction Method Statement additionally outlines how the construction company would liaise with the school to ensure noisy construction works would cease during the summer GCSE and A-Level exam period, given the proximity of the proposed new building to the existing school.

Contamination

62. An Intrusive Geo-Environmental and Geotechnical Site investigation has been carried out on the site and the report makes a series of recommendations for further investigation works to assess the mining history of the local area and immediate site environs. It has also recommended that a robust and comprehensive ground model and geotechnical parameters for the detailed foundation design be carried out, including defining the change in chalk strength across the top field. The report has been assessed by the Environment Agency, who have raised no objection subject to the imposition of conditions to ensure that any contamination found during development that hadn't previously been identified be dealt with in accordance with a remediation strategy to be agreed by the County Planning Authority, and that there be no infiltration of surface water drainage into the ground other than with permission of the County Planning Authority; along with informatives regarding the removal of waste from the site during demolition works.

63. Comments received as a result of the consultation process regarding ground stability on the upper plateau and the possibility of unknown underground facilities would be established through the proposed works outlined above, which would be secured through a suitably worded condition should permission be granted.

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 presumption in favour of development that is sustainable and planning policy CP5 states that any new non-residential development over 1000sqm should meet the BREEAM 'very good' standard. The proposed scheme has been designed to offer a sustainable solution, which is practical and meets the needs of the school. The Department for Education do not request formal BREEAM certification, and therefore the proposed

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

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 applicants 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'. Given the above, it is not considered necessary to impose the BREEAM condition suggested by Dover District Council.

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.
66. The application has been supported by the submission of a Design Proposal Environmental Summary and an Environmental Strategy. 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 Low and Zero Carbon technologies are not necessary in this instance. However, it should be reiterated that the building is designed to limit energy consumption in the first place, and this is achieved through the construction methods and features listed above. In addition, the school are able to provide two electric vehicle charging points on site now and infrastructure for a further three spaces in the future and this combined with the energy saving building design and provision of a biodiverse green roof demonstrate that the applicant's have had consideration to energy consumption and have adopted a proportionate and positive approach. It is also considered that it would be to the detriment of the overall design of the building to have solar panels located on the roof, given its prominent and visible position. With the introduction of the green roof any PV panels would have to be raised on mounts and would therefore sit proud of the roof thus making them much more visible. The suggested condition from Dover District Council (DDC) regarding the restrictions to on-roof plant equipment has been requested in order to avoid more plant being installed on the roof due to the negative impact in design terms this might have, therefore it would be perverse to insist on PV panels in this instance. It is considered unnecessary to impose the condition requested by DDC for renewable provision in full, but rather the recommended condition would be used to secure the provision and retention of the electric vehicle charging points and this has been discussed and agreed with DDC. It is therefore considered that the proposed development would meet the aims of Policy CP5 of the Core Strategy and the guidance of the NPPF.

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

Community Use

67. The school is currently used by the Combined Cadet Force and the design of the new school would allow for this existing community use to continue, as well as now providing use of the new sports facilities. The proposed school has been designed to ensure that the relevant spaces (main hall, sports hall, classroom, changing rooms etc) can be accessed independently from the teaching areas to ensure site security. A condition to secure the community use of the sports facilities, in agreement with Sport England, has been proposed under the recommendations in paragraph 70.

Conclusion

68. In my view the key determining factors for this proposal are the principle of the demolition of the existing building and the heritage impact of this loss, alongside 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 local history of the 1930's building making it a local heritage asset is recognised, the retention of the original building on this basis 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 PSBP2 which seeks to replace education buildings that are nationally recognised as no longer fit to meet current educational needs. The proposed building would be sustainable through its construction methods, utilising energy efficient design, and the design of the building would still meet an equivalent 'very good' BREEAM rating.

69. 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. There would be an overall increase in sports provision on site as a result of the new sports hall, MUGA and regrading of Leney's Field, which would compensate for the loss of the upper field. The sports facilities would be available for community use and therefore of benefit to the wider community. 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, and it would be sustainable. In my view the development would result in a new building which would be a worthy replacement of the existing one, and the scheme would be in accordance with the aims of the NPPF and the Development Plan policies. There are no material planning considerations that indicate that the conclusion should be made otherwise, and I therefore recommend that subject to Historic England determining that the existing buildings are not of listable quality, planning permission be granted subject to the conditions suggested.

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

Recommendation

70. I RECOMMEND that SUBJECT TO Historic England determining that the existing buildings are not of listable quality 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 and architectural details including the roof parapet, window and door openings and reveals;
- No additional plant or machinery shall be installed on the roof without prior approval of the County Council;
- The removal of all temporary buildings from the site within three months of occupation of the new school;
- The provision and permanent retention of the vehicle parking spaces as shown on the submitted plans within 3 months of the demolition of the existing school and their retention thereafter;
- The provision and permanent retention of secure, covered cycle parking facilities as shown on the submitted plans within 3 months of the demolition of the existing school and their retention thereafter;
- The vehicle and cycle parking spaces shall be made available for use outside of school hours in association with using the community facilities on site;
- Within three months of the demolition of the existing school, at least two electric vehicle charging points shall be provided on site (with infrastructure for a further three being made available for the future) and shall thereafter be retained and kept available for electric car use only;
- The new access gates from the existing driveway serving Astor College are for maintenance purposes only and shall not be used for pupil or staff access at school drop off or pick up times;
- The submission of a detailed review of the School Travel Plan incorporating measures to encourage sustainable transport;
- The implementation of the submitted Construction Method Statement 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;
- Details of a lighting scheme to be submitted including hours of use, level of illumination and ongoing control over any new lighting on site;
- Submission of a detailed surface water drainage scheme;
- Submission of a verification report covering this scheme to be approved in consultation with 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;

Item D1

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

- 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;
- Further investigation to be undertaken in accordance with the Geo-Technical and Geo-Environmental Investigation reports;
- No demolition shall take place until a full recording of the existing building to Historic England Level 3 requirements has been made, including a photographic record;
- No demolition shall take place until a building recording of the three sets of WW2 air-raid shelters have been undertaken;
- No development shall commence until a programme of archaeological work is submitted and agreed in writing by the County Planning Authority;
- No development shall commence until details of a receptor site for the translocation of reptiles has been approved in writing by the County Planning Authority;
- Recommendations be carried out, as set out in the Ecological Impact Assessment, for the protection, mitigation and compensation for impacts to bats;
- Mitigation measures for badgers are carried out in accordance with the recommendations of the Ecological Impact Assessment;
- That the safeguarding measures for the Local Wildlife Site are undertaken in accordance with the Ecological Impact Assessment;
- That within 6 months of the date of the planning permission details be submitted to secure ecological enhancement measures;
- Leney's Field shall be bought back into use prior to the first occupation of the new school and the land shall thereafter be retained and maintained for playing field use;
- Prior to occupation of the new school a scheme of ongoing maintenance and management of Leney's Field shall be submitted to the County Planning Authority, to ensure public access doesn't undermine it's role as a sports facility;
- Prior to occupation of the new school a community use agreement shall be submitted to the County Planning Authority for the community use of the sports facilities, changing facilities and on site car parking in agreement with Sport England;
- The protection and retention of all trees on site not shown to be removed as part of the planning application;
- The submission of a method of construction and protection for the trees whose root protection areas would be encroached by the development;
- The submission of a detailed soft landscape scheme, detailing native species planting and species suitable for bee pollination;
- That any plants, trees or shrubs that die or are removed within 5 years of planting are replaced;

71. 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 applicant be provided with the CL:ARE definition of waste for the removal of materials from the site;

Item D1

Demolition of existing school and proposed erection of a part three part four-storey teaching block, attached sports hall, hard and soft landscaping, new Multi Use Games Area (MUGA), parking & ancillary works at Dover Grammar School for Boys, Astor Avenue, Dover, Kent CT17 0DQ – DOV/19/01120 (KCC/DO/0195/2019)

- 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.

Case Officer: Mrs Helen Edwards

Tel. no: 03000 413366

Background Documents: see section heading