



Planning Statement

Kier Construction (Southern)

**CASTLE COMMUNITY COLLEGE,
MILL ROAD, DEAL,
CT14 9BD**

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DHA/MB/10741

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1 Introduction

1.1 Purpose of this Statement

- 1.1.1 This statement has been prepared to accompany a detailed planning application by Kier for the consolidation of Castle Community College to one site at the school's existing campus at Mill Road, Deal and the consequent redevelopment of that site.
- 1.1.2 The application comprises the wholesale redevelopment of the existing Mill Road site consolidating the existing teaching accommodation into a single, high quality building, fit for modern day teaching; accompanied by a new sports complex building incorporating the existing changing rooms. The more modern existing Hamilton Building will be retained and the site will be subject to landscaping and other external works.
- 1.1.3 This statement will provide a detailed overview of the application site and proposals. It will assess the planning considerations of the scheme with regard to any relevant planning history, and the applicable planning policy framework.

2 Project Context

2.1 Overview

- 2.1.1 Castle Community College is a coeducational secondary school currently based across two sites; the Mill Road site in Deal and the Salisbury Road site in Walmer. There are currently 1171 pupils enrolled at Castle Community College with 80 full time and 85 part time staff based at both Mill Road and Salisbury Road.
- 2.1.2 In 2010 Castle Community College amalgamated with Walmer Community College and converted to an academy specialising in sport and performing arts. Currently the school is operating across both school sites and it is the intention to build a new facility to accommodate the whole school on the Mill Road site which will provide 1000 places for 11 – 16 year olds and 300 places for post 16.
- 2.1.3 The current condition of the buildings at the Mill Road campus is poor with the buildings not fit for modern teaching. The new school development is being promoted by the Education Funding Agency (EFA) and funded under the Priority School Building Programme (PSBP). The Priority School Building Programme is a centrally managed programme set up to address the needs of the schools most in need of urgent repair. Through the programme, 261 schools will be rebuilt or have their condition needs met by the EFA. The first school was completed in 2014. All schools within the programme will be delivered by the end of 2017.

3 Application Site

3.1 Site Description

- 3.1.1 Castle Community College's Mill Road site lies approximately 1.2km south west of Deal town centre. The site is formed of an irregular shaped parcel of land of relatively flat land and approximately 9 hectares in area.
- 3.1.2 The existing school buildings are located in the south-western part of the site. These comprise the 'figure 8' main building and six associated buildings to the east which are within areas of formal soft landscaping. There are four landscape gardens which include a memorial garden, located within the quadrants of the main building. The site is also occupied by Tree Tops (a private nursery), Deal Town Rangers Football Club and KCC Adult Education Services, all of which have current leasing arrangements with the school.



Fig 1. Existing Site Layout C/O Google

- 3.1.3 There are a number of garages to the south west of the site which will remain outside of the scope of the project. Similarly, the Deal Town Ranges FC building to the north-west and the Hamilton Building to the south will remain, with the Hamilton Building used by the school to relocate the nursery and adult education facilities.
- 3.1.4 The south-eastern part of the site consists of a grassed area with a car park, a footpath that extends north-west to the main school area and further hard standing netball courts. The north-eastern portion of the site comprises of grassed playing fields and all

weather 3G astro-turf pitch constructed in 2012. The site topography has a gradual slope from the north-west to the south-west corner of the site with an overall ground level fall of around 1.5m.

- 3.1.5 Castle Community College is located within close proximity to public transport links. Bus stops are located directly adjacent to the school site on Mill Road and Hamilton Road and Deal is also serviced by a regular mainline train service.
- 3.1.6 The vehicular access to the school is provided by two gated access points from Mill Road to the west and Hamilton Road to the south. Staff and visitor parking on the site is approximately 90 cars, of which two parking spaces are designated as disabled. Provision for cycle parking is also present on site.
- 3.1.7 Pedestrian access is provided to the school by two gated points to the west and south of the site. The main public and student access point to the site is from Mill Road. Two residences located on Hamilton Road, adjacent to the south entrance, require out of hour access to garages to the rear of the properties and have right of way over the southern entrance to the school and are able to operate the existing gates at this entrance.
- 3.1.8 The site has substantial tree screening on the northern half of the site along the boundaries. Elsewhere, groups of trees provide landscape and amenity function throughout the site.
- 3.1.9 The main building is not statutorily listed nor are there any listed buildings elsewhere on the site.
- 3.1.10 There are no trees covered by TPO and there are no international or national landscape designations covering the site. According to the Environment Agency's mapping the site is located with EA flood zone 1 classification to the south, with the northern portion of the school site and playing fields being classified within EA flood zones 2 and 3.

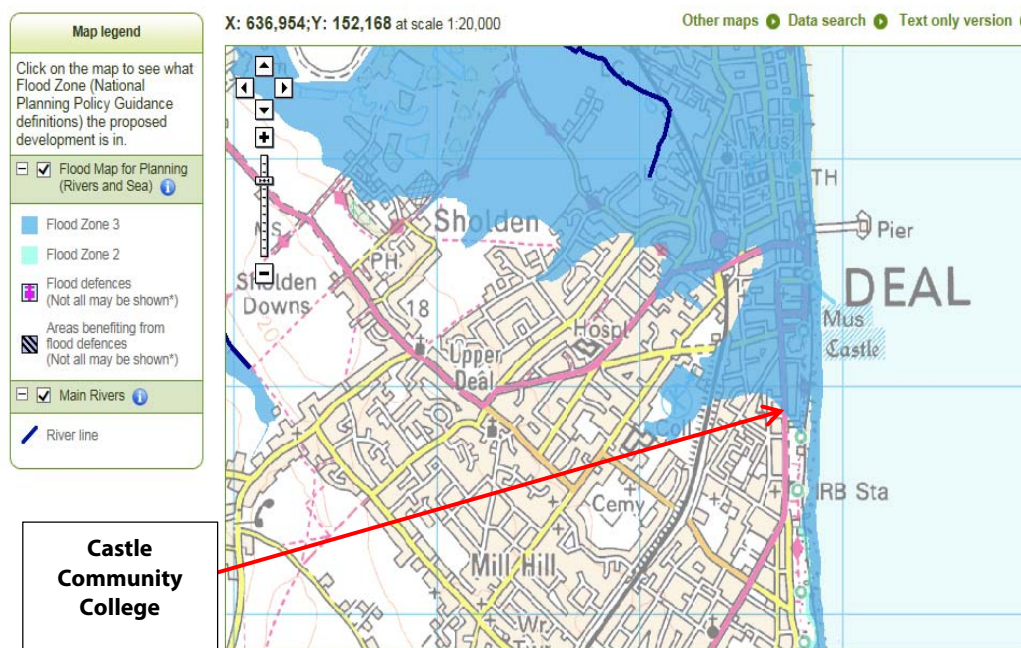


Fig 2 Environment Agency Flood Risk Map extract

3.2 Site Surroundings

- 3.2.1 The surrounding area has a mixed character with residential, educational and leisure uses dominating.
- 3.2.2 To the north of the site is Victoria Park, with a leisure centre slightly beyond. Residential properties and Hamilton Road bound the southern boundary, with a cemetery, residential properties and school immediately south of Hamilton Road. To the western boundary are residential properties and Mill Road. Residential properties and the south-eastern Kent Coastline railway define the eastern boundary of the site.

3.3 Planning History

- 3.3.1 The site was predominantly agricultural land from the mid 1800's until 1889 when the southern part of the site was used as a brick works. The current school was developed circa 1956-1957 and was progressively extended with additional buildings added to the south, east, and north of the main school building. Between 1969 and 1973 a new school building and gym were constructed east of the main school building.
- 3.3.2 In 2008 a new changing block was constructed, which was partially funded by the Football Foundation. Research into the online planning records held by Dover District Council and Kent County Council reveal the site has been subject to a number of planning applications. The details of relevant planning applications are set out in the tables below.

Application No.	Proposal	Decision
KCC/DO/05/01256	Synthetic turf pitch, floodlighting, fencing and footpaths	Granted (Conditions)

Table 1. Planning history from Kent County Council's online records.

Application No.	Proposal	Decision
DO/05/01274	Erection of a single storey rear extension	Granted (Conditions)
DO/11/00610	Erection of a detached store and mini bus garage (existing store to be demolished)	Granted (Conditions)
DO/12/00141	Erection of a portable building, disabled access ramp and 1.8m high fence	Granted (Conditions)

Table 2. Planning history from Dover District Council's online records.

- 3.3.3 On the basis of the above initial review of the planning history of the site, it would appear there are no site specific factors which in principle would prevent the redevelopment/expansion of the School in its current location.

4 Development Proposal

4.1 Overview

- 4.1.1 The proposed development is for the consolidation of the existing teaching accommodation into a single building. This will be accompanied by the erection of a new sports complex building incorporating the existing changing rooms. These will be retained along with the school minibuss garage. The Hamilton Building to the south of the site will be retained and the site will be subject to landscaping and other external works. The Deal Town Rangers Football Club building situated to the north-west of the site will also be retained.
- 4.1.2 The proposed new built development is inclusive of the main teaching block and sports block and link. The total calculated area of then new build is 9,631.82 sqm with the total internal floor areas of buildings to be retained equating to 1,073.04 sqm.
- 4.1.3 As illustrated by the plans, on completion of the new school, the existing school buildings to the west of the site will be demolished. This is to be carried out within a single construction phase minimising the disruption to the school and surrounding area.
- 4.1.4 A full description of the proposal, site layout and design rationale is set out in the submitted Design and Access Statement.

4.2 Site Layout

- 4.2.1 The new teaching block will be situated to the south east of the site and will run parallel with the eastern boundary. The building takes a rectangular footprint and is set back from the eastern boundary of the site, allowing the area of hard play area to be retained and a separation with neighbouring residential properties of Stockdale Gardens. The building's orientation makes best use of the existing site topography and provides a positive presence on Hamilton Road with the main entrance accessible from the proposed new car park to the south.
- 4.2.2 To the north of the site will be located the new sports block which will be linked to the existing changing rooms to provide access from the sports hall, fitness suite and dance studio. The Hamilton Building for Tree Tops Nursery and Adult Education to the south will be retained and refurbished (although this application does not include any refurbishment works which will be pursued separately). Deal Town Rangers Football Club to the north west of the site will also be retained.

4.3 Building Form and Appearance

- 4.3.1 The proposed main teaching block building will be three storeys and primarily flat roof in form. The building layout adopts a simple rectangular plan form with classrooms arranged equally over the three floors and four elevations. The central plan area consists of an atrium above the dining hall and a double height space above the main performance hall.

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- 4.3.2 A new sports block is proposed inclusive of a four-court multi-purpose sports hall, dance studio and fitness studio. The existing changing rooms will be retained alongside the new development and a new link created between them and the new sports block.
 - 4.3.3 In terms of materials, the selection has been made first and foremost on the basis of high quality appearance and external design. Durability, design life and low maintenance are also considered. The primary material for the new school is reinforced insulated render with feature panels of through colour render. A panel rain screen cladding system to the main entrance will wrap around the main entrance to provide context, texture and relief.
 - 4.3.4 Insulated cladding panels and fair faced architectural masonry are proposed for the sports hall. The coloured render proposed for the fitness suite defines the main entrance and contrasts with the existing facade of the changing rooms.
 - 4.3.5 The three storey teaching block will be construed with a steel frame and precast concrete intermediate floors. The roof will be a hot melt system on precast concrete and screed. The sports hall will also be construed with a steel frame with pre cast concrete over the lower roofs and a standing seam roof over the sports hall. All rainwater pipes will be internal.
 - 4.3.6 In terms of the windows, the east, west and south façade will utilise polyester powder double glazed composite wood and aluminium with solar glass to reduce solar glare.
 - 4.3.7 Further details of the form and appearance of the new buildings are provided in the submitted Design and Access Statement.

4.4 Parking and Access

Parking

- 4.4.1 As per the current situation on site, parking at the proposed school will be provided in three separate locations. The access to the west of the school will lead to a car park which will now be provided with 74 car parking spaces. Added to this, the southern access points will link to two further parking areas – one near to the centre of the site and the other to the south east.
- 4.4.2 The proposed parking will be provided in accordance with the SPG4 adopted KCC standards. In total, 169 car parking spaces will be provided, 11 of which will be allocated for mobility impaired users. Additionally, 186 cycle stands and 8 motorcycle bays are proposed.
- 4.4.3 The proposal is inclusive of a drop off lay-by area located to the south of the on-site link road which connects between the 'in-only' and 'out-only' accesses. An adjacent pedestrian area will be provided for those exiting the cars as they stop. This will ensure the safety of the students and that any congestion and overspill of 'drop-off' parking in the surrounding residential streets can be avoided.

Access

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- 4.4.4 As part of the proposals, minimal changes are proposed to the existing access points of Castle Community College. The existing access to the west of the site will remain in its current form with a 6.5m wide carriageway (reducing slightly to the east) which allows for two-way movements. The current 2.0m wide footways to the north and south of this access will remain in place, providing safe pedestrian links into the site.
 - 4.4.5 In regard to the two access points to the south of the site, there will be no material changes and they will be retained in their current form. The existing signage will however be improved to emphasise that the western access is in only and the eastern access is out only. In addition signs will highlight that pedestrians should only access the site via the western access where a footway is provided.
 - 4.4.6 The new teaching block and new sports hall are positioned to provide optimum levels of accessibility. New on site crossing points will aid the safety of pedestrians and all footpaths within the school grounds will take the form of wide open routes to create a pleasant walking environment.

4.5 Sustainable Design

- 4.5.1 It is proposed that the school will be naturally lit and naturally ventilated with the adoption of a fabric first principle to maintain thermal comfort and reduce heating and cooling demand.
- 4.5.2 The inclusion of rooflights will provide natural daylight and ventilation to the primary circulation areas of the deep plan form. The building has followed the detailed and prescriptive EFA Contractor's Framework Facilities Output Specification, which requires designs to demonstrate that passive design measures have been optimised including fabric first principles, and that resources, waste, CO2 emissions and energy demand are minimised.

4.6 Landscaping

- 4.6.1 The primary objective of the landscape strategy is to provide a clear hierarchy of well organised spaces which make the best use of the existing site to create flexible, safe and functional spaces.
- 4.6.2 The existing playing fields, sports pitches, astro turf pitch, boundary trees and vegetation will be retained in full to ensure the existing levels of security and soft screening is maintained.
- 4.6.3 Tree planting is proposed for the eastern facade on the new teaching block to provide shelter and shading and for the integration of the new school into the existing landscape.

The demolition of the existing school buildings will open up this area of the site for landscaping which will form a predominantly grassed area. This grassed area could be utilised as a teaching resource and school amenity space.

5 Planning Policy Framework

5.1 Development Plan

- 5.1.1 Under Section 38(6) of the Planning and Compulsory Purchase Act 2004 applications for planning permission are required to be determined in accordance with the provisions of the development plan in force unless material considerations indicate otherwise.
- 5.1.2 In the context of the application site, the Development Plan consists of the Dover District Council Adopted Core Strategy (2010), the Land Allocations Local Plan (2015) and the saved policies from the Dover Local Plan (2002). There are no policies within the Land Allocations Local Plan which are relevant to this application.
- 5.1.3 A series of other planning policies are material to the proposals and these are reviewed after the policies of the development plan. They include National Policy, supplementary planning guidance and standards.

5.2 Dover District Proposal Map

- 5.2.1 The Proposals Map extract below shows that the School falls within the designated settlement boundary of Deal with the majority of the site to the west and north of the existing teaching buildings falling within an area of protected open space. As detailed in the EA flood Maps, part of the school's playing field area to the north of the buildings falls within Flood Zone 3. The site is not subject to any other site specific policy designations.

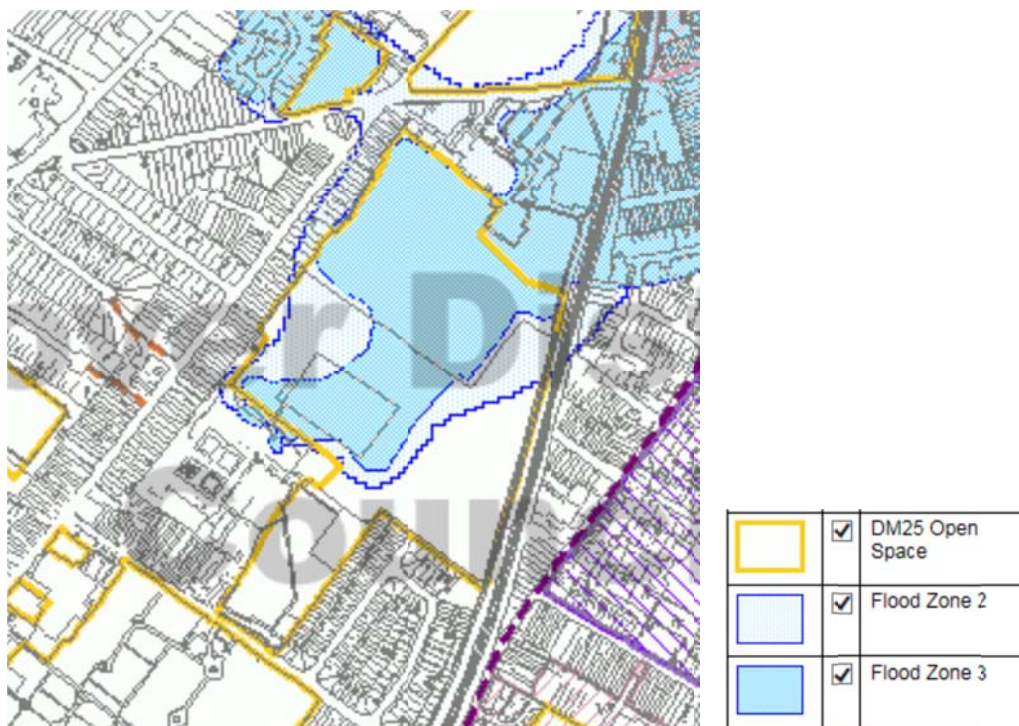


Fig 4: Dover District Council online Proposals Map Extract

5.3 Saved' Policies of the Local Plan (2002)

5.3.1 The following 'saved' policy of the Local Plan is the only one considered relevant to the proposal.

5.3.2 **Policy OS6** (Indoor sports and recreational facilities) states that proposals for indoor and recreational facilities will be permitted provided that:

- *any major new facility is located in Dover or Deal at a site within the town centre or, if no such site is available, located on the edge-of-centre with good pedestrian and cycle links to the centre, or if no such site is available, is located elsewhere in the urban area on a site which is or can be made accessible by a range of transport modes, including public transport; or*
- *If located at a rural settlement, they only satisfy an identified local need.*

5.4 Dover District Council Core Strategy (2010)

5.4.1 **Policy CP1** (Settlement Hierarchy) sets out 6 settlement types and sets out the scale of development that would be supported within them. Deal been defined as a 'District Centre', which is second in the hierarchy and suitable for urban scale development.

5.4.2 **Policy CP5** (Sustainable Construction Standards) states that new non-residential development over 1,000 square metres gross floor space permitted after adoption of the Strategy should meet BREEAM very good standard (or any future national equivalent). The Policy goes on to state that '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 floor space, the Council will encourage proposals to incorporate energy and water efficiency measures.

5.4.3 **Policy DM1** (Settlement Boundaries) states that development will not be permitted on land outside the urban boundaries and rural settlement confines shown on the proposals map unless specifically justified by other development plan policies, or it functionally requires such a location, or it is ancillary to existing development or uses.

5.4.4 **Policy DM11** (Location of Development and Managing Travel Demand) requires planning applications for development that would increase travel demand to be supported by a systematic assessment to quantify the amount and type of travel likely to be generated and include measures that satisfy demand to maximise walking, cycling and the use of public transport.

5.4.5 **Policy DM13** (Parking Provisions) states that parking provision for non-residential development, and for residential cycle provision, should be informed by Kent County Council Guidance SPG4, or any successor.

5.5 Material Considerations

- 5.5.1 Government Policy in the form of the National Planning Policy Framework, and Supplementary Planning Documents form relevant material considerations.

The National Planning Policy Framework

- 5.5.2 In 2012 central government published the National Planning Policy Framework (NPPF) that sought to consolidate all previous planning policy guidance and statement into one document. The NPPF advocates a presumption in favour of sustainable development. Development proposals that accord with the development plan are to be approved without delay.

- 5.5.3 **Para 17** suggests that decisions should always seek to secure a high quality design and good standard of amenity for all existing and future occupants of land and buildings.

- 5.5.4 **Para 32** covers sustainable transport, it requires all developments set to generate a significant amount of movement to be supported by a Transport Statement/Assessment to take account of whether:

2. *The opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure*
3. *Safe and suitable access to the site can be achieved for all people; and*
4. *Improvements can be undertaken within the transport network that cost effectively limits the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe'.*

- 5.5.5 **Para 39** requires local authorities to take into account the following criteria when setting local parking standards for residential and non-residential development;

5. *the accessibility of the development;*
6. *the type, mix and use of development;*
7. *the availability of and opportunities for public transport;*
8. *local car ownership levels; and*
9. *An overall need to reduce the use of high-emission vehicles.*

- 5.5.6 **Para 56** focuses on good design, stating it is a key aspect of sustainable development, it is important to plan positively for the achievement of high quality inclusive design for all developments.

- 5.5.7 **Para 58** highlights the importance of good design. It states developments should function well and add to the overall quality of the area, establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable place. Optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks.

Development should respond to local character, history, and reflect the identity of local surroundings and materials, whilst not preventing appropriate innovation. Create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Be visually attractive as a result of good architecture and appropriate landscaping.

5.5.8 **Para 64** states permission should be refused for development of poor design that fails to take opportunities to improve local character and quality of the local area.

5.5.9 **Para 72** directs Local Planning Authorities to '*give great weight to the need to create, expand and alter schools*'.

6 Open Space and Recreation Provision

6.1 Overview

- 6.1.1 As detailed in the Dover District Local Plan Proposals Map, the majority of the application site to the east and north of the existing teaching buildings fall within an area of designated protected open space.
- 6.1.2 This section sets out the relevant planning policies in regard to Open Space and Recreation Provision from the Adopted Development Plan, emerging policies and other material considerations.

6.2 Planning Policy

Saved Policies of the Local Plan (2002)

- 6.2.1 **Policy OS7** (Outdoor sports and recreational facilities) states that proposals for outdoor sports and recreational facilities or for the expansion/enhancement of existing facilities will be permitted provided that the facilities do not cause harm to residential amenity through noise or illumination.

Dover District Council Core Strategy (2010)

- 6.2.2 **Policy DM25** (Open Space) sets out circumstances where the loss of open space as a result of development may be justified, including in the case of a school site the development is for educational purposes.
- 6.2.3 It states that proposals for development that would result in the loss of open space will not be permitted unless:
- *There is no identified qualitative or quantitative deficiency in public open space in terms of outdoor sports sites, children's play space or informal open space; or*
 - *Where there is such a deficiency the site is incapable of contributing to making it good; or*
 - *Where there is such a deficiency the site is capable of contributing to making it good, a replacement area with at least the same qualities and equivalent community benefit, including ease of access, can be made available; or*
 - *In the case of a school site the development is for educational purposes; or*
 - *In the case of small-scale development it is ancillary to the enjoyment of the open space; and*
 - *In all cases except point 2, the site has no overriding visual amenity interest, environmental role, cultural importance or nature conservation value.*

- 6.2.4 The Council have recently published their Playing Pitch and Outdoor Sports Facility Strategy. However, as this proposal does not affect any playing pitches, as recognised by Sport England, this is not relevant in this instance.

National Planning Policy Framework (NPPF) (2012)

- 6.2.5 **Paragraph 74** states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- *An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- *The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- *The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.*

Sport England Planning Policy Statement – Policy Guidance for Planning Applications for Development on Playing Fields

- 6.2.6 Sport England is a statutory consultee on planning applications affecting playing field land. The requirement to consult Sport England covers all playing field land regardless of ownership and all playing pitches regardless of their surface (i.e. natural and artificial grass pitches).

- 6.2.7 The organisation holds power of direction over planning applications. This means that if a local planning authority grants permission despite an objection from Sport England, the authority must notify the Secretary of State, who may then call in the scheme for their own determination. Sport England therefore hold a position of significant authority within planning decision making and whilst their own policy guidance does not form part of the statutory development plan it does form a significant material consideration given the organisation's level of authority.

- 6.2.8 **Policy P1** of Sport England Policy Statement sets out the exceptions to their general presumption against the loss of playing fields. These comprise the following:

- *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.*
- *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.*
- *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.

- *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 the commencement of development.*
- *The proposed development is for an indoor or outdoor sports facility, 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.*

6.3 Proposal

6.3.1 It is proposed to demolish an existing building and provide a sports hall and three storey teaching block. This will include the replacement of the internal sports facilities, not including the existing changing facilities which will be retained. The proposed internal sports facilities are inclusive of a sports hall, fitness studio and dance studio.

6.3.2 Existing and Proposed Site Areas are set out below:

	BB103 Area Requirement	Existing.	Proposed.	Variation against existing.	Variation against the BB103
Soft Outdoor PE	51500	53306	54018	712	2518
Hard Outdoor PE	2350	3153	3153	0	803
Soft Social	3200	4440	12014	7574	8814
Hard Social	1500	6506	4328	-2178	2828
Habitat	650	1210	1618	408	968
Float	7300	n/a	n/a	n/a	n/a
Min Net Site Area	66500	68615	75131	6516	8631
Non Net Area	8500	21667	15151	-6516	6651
Min Total Site Area	74000	n/a	n/a	n/a	16282
Max Total Site Area	92900	90282	90282	0	n/a

6.3.3 The Building Bulletin 103 was published in June 2014 by the Department for Education and Education Funding Agency to set out the non-statutory area guidelines for mainstream school buildings and sites. As above, the existing and the proposal areas

have been set out and referenced against the area requirements of the Building Bulletin 103.

6.3.4 It is noted that the proposed space exceeds both the minimum total site area required by the BB103 and the minimum requirements for each individual category. Additionally the total proposed surplus open space exceeds the minimum float space (the contingency area). The table therefore confirms that there is adequate space on the site to accommodate an increase in pupils and staff and that the proposals satisfy the relevant guidelines.

6.3.5 In terms of playing fields, the calculations confirm that there is no difference in the amount of playing fields proposed as the existing Astro Turf Pitch and the grassed pitch areas are unaffected by the development. Whilst the proposal does not involve an increase in the area of Hard Outdoor PE (games Courts), it is noted that the existing provision exceeds the minimum required to accommodate the increase of pupils.

6.4 Planning Considerations

6.4.1 **Policy DM25** of the Dover Core Strategy (2010), and **Paragraph 74** of the NPPF (2012) both seek to retain areas of open space for sport and recreation provision and state that development that would result in the loss should be resisted unless there is a proven overriding need for the development and there is no existing deficiency in the local area. It is also noted that **Policy DM25** allows for the loss of open space 'in the case of a school site the development is for educational purposes', irrespective of any deficiency.

6.4.2 It is clear in this instance that the proposed development is for educational purposes on an existing school site. It will deliver significant educational and other related social benefits and meets the specified exception criteria contained within Policy DM25. It is also noteworthy that notwithstanding this exception criterion, post development, there will be an increased area of open space across the site, albeit reconfigured and not aligned with the current Policy DM25 boundary. Given the need and ability to undertake the development in a single phase and avoid the need for disruptive pupil decanting into temporary accommodation on site or elsewhere, this is a necessary consequence of meeting the educational need.

6.4.3 Whilst it is noted that the proposal will result in the loss of open space, the proposal will not result in the loss of existing playing field as the existing Astro Turf Pitch and grassed pitches are unaffected by the development. Sport England were engaged directly at the pre-application stage and raise no objection to the proposed siting of the new teaching block. They have confirmed that to their satisfaction the land is not currently used for playing pitch provision and is physically and functionally separate from the formal playing field areas to the north east of the school site.

6.4.4 The redesign of the site layout following the demolition of the existing buildings means that enhanced sports and recreation facilities can be provided which improve the quality and quantity of sports facilities provided. The school will also have a new equipped gym and fitness studio which will broaden the range of indoor fitness and recreation activities available to the school and the local community.

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- 6.4.5 The proposal is in accordance with saved Policy 056 which permits the development of indoor sports facilities on the edge-of the town centre providing there is good pedestrian and cycle link. The site is sustainably located both in terms of public transport and pedestrian accessibility.
- 6.4.6 The principle of dual use of school facilities is encouraged in the adopted Core Strategy with para 3.23 stating that ‘the opportunity must also be taken to improve indoor recreational facilities through dual use of new secondary school facilities provided through the Building Schools for the Future programme’.
- 6.4.7 The new school sports block development achieves this aim through its intended community use provision and does not conflict with the requirements of Core Strategy **Policy DM25**, the NPPF or Sport England’s guidance aimed at protecting playing fields. The development is thus acceptable in respect of open space provision.

7 Planning Considerations

7.1 Overview

- 7.1.1 The following section reviews the key planning considerations arising from the proposed development. Reasoned justifications are provided in support of the application proposals in the context of the relevant policy framework.

7.2 Principle of Development

- 7.2.1 Para 72 of the NPPF attaches great importance to ensuring a sufficient choice of school places are available, it states local planning authorities should give great weight to the need to create, expand or alter schools. Dover District Council throughout the Core Strategy (2010) also recognise the need to modernise and improve the standard of both primary and secondary school provision in Dover to support enhanced learning and educational attainment.
- 7.2.2 Currently the site is used for education; however the buildings are not fit for purpose for modern teaching or for accommodating the combined Deal and Walmer pupil capacity.
- 7.2.3 Constructing new school facilities on the existing site at Mill Road would help to provide a transformed educational experience for the pupils of Castle Community College through the provision of brand new facilities. In terms of built form, the proposed layout is considered to be acceptable as the existing school buildings will be demolished and the new building will be confined to the approximate footprint of the current school. This approach also avoids the need for disruptive decanting of pupils and any reliance upon temporary accommodation during the construction phase.
- 7.2.4 There are no Tree Preservation Orders on the site, the School does not fall within a Conservation Area and none of the existing School buildings are listed.
- 7.2.5 The ministerial statement outlines Central Government's requirement for Local Planning Authorities to fully justify any decision to refuse planning permission for schools development and indicates that given the strong policy support for improving state education, the Secretary of State will be minded to consider any refusal to be unreasonable conduct, unless it is supported by clear and cogent evidence.
- 7.2.6 Therefore the broad principle of expanding the School in this location is considered acceptable and complies with Core Strategy Policies DM1 and DM11. The development benefits from strong and clear support in principle in the development plan and more so given the condition of the existing accommodation and the educational benefits that will be delivered to a large number of students.

7.3 Design

- 7.3.1 The accompanying Design and Access Statement fully explains and illustrates the design principles and concept of the proposed redevelopment of Castle Community College.

- 7.3.2 Para 58 of the NPPF highlights the importance of good design, stating that developments should function well, add to the overall quality of the area and establish a strong sense of place. It states that any new development should respond to local character, history, and reflect the identity of local surroundings and materials, whilst not preventing appropriate innovation.
- 7.3.3 The design and visual appearance of the proposal will be a significant enhancement of the site in replacing the existing school buildings no longer fit for purpose with high quality buildings that are much improved in terms of materials, architectural form, layout and massing.
- 7.3.4 Overall the proposed development complies with para 58 of the NPPF, provides a non-intrusive form of redevelopment that will create a fit for purpose educational building and new sports complex building which improves the visual appearance of the site and provide flexible and functional spaces for all users, whilst creating an innovative and inspiring learning environment.
- 7.3.5 In the above ways the proposal is considered to meet with all of the design objectives set out in the NPPF to achieve high quality design and distinctiveness.

7.4 Access and Parking

- 7.4.1 A Transport Statement and School Travel Plan have been produced to accompany this application in accordance with the NPPF. This has been scoped with KCC Highways and is informed by parking and traffic count surveys, as well as a 'hands up' survey carried out by the school to understand existing travel mode shares and analysis of pupil location data.

Access

- 7.4.2 **Paragraph 32** of the NPPF (2012) recognises the importance of safe and suitable access for all people.
- 7.4.1 It is noted that only minor changes to the existing accesses are proposed. The existing access to the west of the site will remain in its current form. The footways to the north and South will remain in place, providing safe pedestrian links onto the site.
- 7.4.2 The existing access to the site from Hamilton Road will become the primary access and will be extended to provide an onsite drop off point and extension to the existing car parking. It is considered that moving the primary access from Mill Road to Hamilton Road will help to reduce traffic and congestion and peak times.

Parking

- 7.4.3 In total 169 car parking spaces are proposed on-site. This provision accords with the permitted levels set out in the relevant Kent County Council (KCC) guidance (up to 180) and is deemed adequate to cater for the expected demand.

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- 7.4.4 In addition to this parking provision, a drop-off and pick-up area is proposed within the site which will formalise pupil trips and allow up to 8 vehicles at a time to safely pick-up or drop-off children away from the public highway.
- 7.4.5 Cycle parking is provided in accordance with the relevant standards and at a level that will meet current and anticipated usage and demand.
- 7.4.6 The transport Assessment concludes that the proposal provides adequate parking without the need for overflow parking onto the public highway. The existing staff car park will be continue to be utilised providing parking for staff and for community access to the new sports hall outside of the school hours.

Local Highways Impact

- 7.4.7 With regard to the potential impacts of the school upon the local highway, an assessment of the proposed parking has shown that there should be adequate provision to serve the number of pupils and staff on-site, with no need for overflow parking onto the local highway. In addition, analysis of trip attraction and distribution together with assessments of all key junctions has shown no patterns or concerns that could be attributed to faults with the highway layout. The site is well served by non-car transport provision and also benefits from good local footway provision.
- 7.4.8 The Transport Statement concludes that the proposals should not result in any detrimental impacts in transport terms and therefore there should be no sound transport based objections to the proposals. In view of this conclusion the proposed school development is considered to directly comply with the objectives of the NPPF.

Travel Plan

- 7.4.9 A draft Travel Plan accompanies the application and will be finalised and adopted by the school to promote sustainable travel through a range of initiatives. A Travel Plan co-ordinator will be identified and will oversee the management, implementation and review of the Plan.
- 7.4.10 The draft Plan sets the following targets, which will be reviewed annually and updated as appropriate:
- A minimum 20 percent reduction in pupil travel by car.
 - A minimum 10 percent reduction in staff single occupancy car trips.
 - An overall reduction in vehicle trips generated by the school during peak hours by around 10 – 20 per cent.
- 7.4.11 Measures that will be actively introduced and explored include Walk to School events, WALKBUDI and BIKEBUDI schemes, cycle proficiency courses and the promotion of public transport timetable information. This will be alongside the provision and maintenance of safe pedestrian and cycle routes and cycle parking. These together will

help to minimise car travel and improve the overall sustainable operation of the school. A final Plan can be secured by condition.

7.5 Residential Amenity

- 7.5.1 Castle Community College is predominantly surrounded by residential properties, particularly to the south and east. It will therefore be important to consider the impact of a new school development or any extension plans on nearby residential amenity.
- 7.5.2 The site benefits from cluster mature trees and shrubs along the existing boundaries to the site. These will be retained to provide a buffer zone between the existing playing fields and residential developments of Stockdale Gardens, Mill Road and Hamilton Road. Where possible additional trees will be planted around the site to enhance the character provide screening to minimise overlooking and privacy issues.
- 7.5.3 The siting of the teaching block maintains 44m separation distance from the eastern side boundary, beyond which properties along Stockdale Gardens are set back some distance from their rear boundary with the school. It is noted that this is 7m further away from the boundary than the EFA Control Option. This separation distance will assist in ensuring that the development will not unduly overlook or have any detrimental impact to the neighbouring residential amenity.
- 7.5.4 The development has also been informed by an assessment of shadowing resulting from the proposed teaching block and this is contained within the Design & Access Statement. As this demonstrates, the location of the building and separation from the eastern boundary is such that there will be no overshadowing impact for the vast majority of the time. Only during short periods of late evening in the summer months will there be an impact on the neighbouring gardens and for the vast majority of this period, the garden area to the rear of the properties on Stockdale Gardens will remain free from shadow. This minor impact is not considered to materially impact upon the residential amenity of the neighbouring residents.
- 7.5.5 As the Design & Access Statement sets out in detail, the application proposal is the optimum scheme to address the various site constraints and for that reason, the original Control Option was amended to address issues regarding servicing, phasing and delivery. This therefore represents the best means of addressing all site constraints, including preserving residential amenity.
- 7.5.6 For the above reasons, it is considered that the siting of the building on the existing education site at Mill Road will not have an unacceptable impact on the amenities of the surrounding residents and is therefore in accordance the objectives of the NPPF.

7.6 Community Facilities

- 7.6.1 The college currently offers opportunities for both indoor and outdoor facilities. It is the intention to develop their community use. The new sports facilities will be open extensively to the public and it is considered that there is potential for Community Groups to use the new academy for functions and after school courses making use of the ICT classrooms, art rooms and meeting rooms.

7.6.2 The principle of dual use of school facilities is encouraged in the adopted Core Strategy with para 3.23 stating that *'the opportunity must also be taken to improve indoor recreational facilities through dual use of new secondary school facilities provided through the Building Schools for the Future programme'*.

7.6.3 The new school development achieves this aim through its intended community use provision.

7.7 Environmental Issues

Potential for EIA

7.7.1 The proposed development does not constitute any of the types of development set out in Schedule 1 and 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. The new school expansion development proposal is therefore not considered to be EIA development. The site is located within the settlement boundary of Deal, and is not subject to any local or national landscape or nature conservation designations.

Arboricultural Impact

7.7.2 A survey of the existing trees on site was carried out by Jacobs UK Ltd in June 2014 and accompanies this application. The purpose of the survey was to record information about the trees located on the main site and adjoining green space to the south and to provide a tree survey report showing the root protection areas.

7.7.3 Of the trees inspected, the following is a breakdown of the various numbers of trees and groups in each BS category:

- 43 'B' grade trees;
- 4 'B' grade groups;
- 3 'B' grade hedges;
- 26 'C' grade trees;
- 3 'C' grade groups;
- 4 'U' grade trees; and
- 1 'U' grade tree stump.

7.7.4 The report notes that the 'B' grade trees are of moderate quality and should be considered for retention. The 'C' grade trees are of low quality and value and should not place a constraint of the proposals. Finally the 'U' grade trees, with a life expectancy of less than 10 years could not be considered for retention.

7.7.5 It is recommended that the loss of any trees can be mitigated by appropriate replacement planting, taking into consideration the suitability of species. As the proposed layout and landscape plans show, wherever possible, existing trees are to be retained, including those sited to the south of the proposed teaching block and along the eastern boundary. A small number of trees will unavoidably require removal, some of which are recommended for removal notwithstanding the proposed development,, and these will be compensated for in the new landscaping scheme.

Ecology

- 7.7.6 An 'Extended Phase 1 Habitat Survey' was carried out by Jacobs UK Ltd on the 4th June 2014 and accompanies this application. A summary of the survey findings has been set out below.

Desk Study

- 7.7.7 A desk study was undertaken to determine the presence of sites and habitats of conservation importance and historical records of protected and notable species within a 1km radius of the application site. The findings are summarised below:

- (1) *Designated Sites* – There are no statutory designated sites within 1km of the site.
- (2) *Non-statutory Designated Sites* – There is one non-statutory designated site within 1km of the site which is Kingsdown and Walmer Beach Local Wildlife Site (LWS) which lies approximately 500m to the south east of the site.
- (3) *Ancient Woodlands* – There are no ancient woodland within 1km of the site.
- (4) *Biodiversity Framework Priority Habitats* – One BF Priority Habitat is located within 1km of the site. This is coastal vegetated shingle which is part of the Kingsdown and Walmer Beach LWS.

- 7.7.8 It is not considered likely that any development of the site will lead to negative impacts on the LWS in the long-term. No mitigation measures were therefore recommended.

(1) *Protected and Notable Species*

- (a) *Mammals* – There is a single record of Water Vole (1982 –outdated) and a single record of Hedgehog;
- (b) *Bats* – There are numerous records of bat species within 5km of the site;
- (c) *Birds* – There are numerous records of bird species within 1km of the site;
- (d) *Reptiles and Amphibians* - There is a single record of each of the following within 1km of the site; smooth newt, common toad, common frog, slow worm and viviparous lizard;
- (e) *Invertebrates* – There are numerous records of invertebrate species within 1km of the site.

Protected Species

- 7.7.9 A survey of the site revealed that there were no visible signs of occupancy by bats but it was identified there were a number of trees suitable to support roosting the species. It was recommended that roost surveys be conducted (outlined below) and enhancements for bats considered for the inclusion in the design of the new development and surrounds.

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- 7.7.10 No bird nests or nesting behaviour was recorded within the trees in the site. It was noted that all of the trees and buildings onsite offer nesting opportunities for birds. However the habitats on site are of low quality and are small in extent; further surveys were therefore considered unnecessary.
- 7.7.11 The report confirms that no badger setts or other evidence of badger activity were found within the site. Therefore no further survey or enhancement is recommended.
- 7.7.12 It is noted that there is an ornamental pond on site. There were no signs of great crested newts recorded. Therefore no further survey or enhancement was recommended.
- 7.7.13 It is noted that there are several areas with habitat suitable to support reptiles. Habitat with potential to support reptiles should be retained as far as possible. It is recommended that further surveys are undertaken to calculate a relative reptile population. These are outlined below.
- 7.7.14 The report confirms that there are no potential water vole habitats on site and therefore water voles are considered to be absent from the site. Therefore no further survey is recommended.
- 7.7.15 The report concludes that with the exception of the potential for bats and reptiles which requires further assessment, there are considered to be no ecological constraints to this development.

Reptile Survey

- 7.7.16 As recommended during the Extended Phase 1 Habitat Survey, a Reptile Population Size Class Assessment was carried out by United Environmental Services in October 2014. The objective of the survey was to establish whether or not reptiles are using the site, and if so to determine the species, population size and importance of the site in order to inform the planning process.
- 7.7.17 The report confirms that a maximum of 8 Slow-worms were recorded by observation and therefore the site can be defined as supporting a 'good' population. It is noted no other reptile species were recorded on site.
- 7.7.18 It is recommended a translocation scheme and habitat creation and management plan should be produced, which details the mitigation and compensation measures implemented on site in order to safeguard protected species. This can be secured by condition and a dedicated reptile relocation area is identified on the submitted plans in the north eastern corner of the site to accommodate this requirement,

Bat Survey

- 7.7.19 As recommended during the Extended Phase 1 Habitat Survey, a Bat Survey was carried out by United Environmental Services in October 2014. The objective of the survey was to establish whether or not bats are using the buildings on site to roost, and if so, to assess the type and importance of the roost in order to inform the planning process.

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- 7.7.20 The report confirms that there were no bats recorded emerging from or returning to roost in the buildings on site and no bat field signs were recorded during the building inspection. Therefore no further surveys are required.
 - 7.7.21 It is recommended that the implementation of an appropriate landscaping plan and integration of bat boxes within the new buildings on site or hung on trees locally could improve habitats for foraging, commuting and roosting bats. This can be secured by condition.

Ecological Mitigation and Enhancement Plan

- 7.7.22 A Ecological Mitigation And Enhancement Plan has been prepared in support of the application, setting out the measures that will be implemented on site to enhance biodiversity and mitigate against ecological impacts of development. This has been informed by the detailed surveys of the site and in turn has informed the landscaping proposals put forward.
- 7.7.23 Measures proposed include removal of invasive plants from the site, the creation of a long-term reptile habitat receptor area, new tree planting and the appropriate management and timing of works on site.

Contamination

- 7.7.24 A Land Quality Statement Report accompanies the application, providing a detailed risk assessment in relation to ground conditions and potential contamination. This report has been informed by desktop analysis and site walkover, as well as gas monitoring, soil sampling and laboratory testing.
- 7.7.25 The report details the results of this testing and sets out recommendations for additional work including further testing and remediation works where required and where contamination has been recorded. These can be suitably secured by condition, ensuring that as part of the development any remediation required is carried out and risks to end users and other receptors are fully mitigated.

Flood Risk and Drainage

- 7.7.26 The site is located with EA flood zone 1 classification to the south, with the northern portion of the school site and playing fields being classified within EA flood zones 2 and 3 and therefore a full Flood Risk Assessment is required.
- 7.7.27 The application is accompanied by a Level 1 Flood Risk Assessment, which in turn is informing a detailed Level 2 Assessment. This has been discussed directly with the local authority and the Environment Agency and will be submitted shortly, demonstrating how the proposals satisfy the requirements of the NPPF and ensure flood risk is suitably managed, avoiding any off-site impacts.

7.8 External Lighting

- 7.8.1 The new school development will require external lighting and an external lighting strategy has been submitted. This has been devised to provide adequate lighting levels on site where required to ensure safe manoeuvre of pedestrians and vehicles, whilst keeping the number of lights to a minimum and specified such that spill is also avoided in the interests of neighbouring amenity.

7.9 Noise

- 7.9.1 A Stage C/D Acoustic Report has been prepared by MLM Acoustics and accompanies this application. Baseline noise monitoring was undertaken at a location representative of the proposed school facades and the closest noise-sensitive receptors in the vicinity of the site to inform the design in terms of the specific acoustic design features necessary in order to comply with the requirements, ensuring a suitable teaching environment is provided and that any potential impacts on neighbouring properties mitigated.
- 7.9.2 The report notes that the natural ventilation by the use of openable windows is likely to be appropriate for all rooms at the school. A conventional external wall construction with thermal double glazing would be sufficient to reduce outdoor noise to meet the required internal ambient noise levels (IANL).
- 7.9.3 The Acoustic Strategy also includes consideration of the potential noise impact of plant on site on neighbouring residential properties and identifies the proposed rating level at any noise sensitive receptor that should be met. Screening of any external plant as well as provision of noise attenuators to items of plant may be necessary to control the transmission of noise and achieve the identified criteria, as well as to reduce the noise level produced by the plant to a reasonable extent around the footprint of the building itself. Environmental attenuators and possibly other means of noise mitigation such as acoustic louvers or acoustic screens) may be required to control noise emanating from the plant rooms, air intake and discharge points or from externally mounted plant. These measures can be controlled via a suitably worded condition.
- 7.9.4 It is considered that the site benefits from clusters of mature trees and shrubs along the existing boundary lines. These will be retained to provide a buffer zone to mitigate the noise impact from the existing play areas affecting the surrounding residential amenity, albeit there is no change here from the existing situation in any event.

7.10 Archaeological Impact

- 7.10.1 A Desk-Based Assessment and Archaeological Watching Brief on Site Investigation report has been prepared by Canterbury Archaeological Trust Ltd and is submitted with the application. This followed the digging of test pits on site and accompanying desktop research including a review of previous watching brief and geotechnical survey work carried out on the site.
- 7.10.2 The report concludes that the proposed development area lies in an area of archaeological potential. Part of the site is known to have been impacted upon by

quarrying, but the full extent of this is unknown. The watching brief work recorded substantial areas which had not been quarried with the most recent work identifying possible archaeological remains cutting into the natural geology in the north-west of the site.

- 7.10.3 It is recommended that the footprint of the proposed new college building be stripped to allow full and appropriate recording of the Second World War structures. This will inform further mitigation as to whether preservation in situ or preservation by record is appropriate.
- 7.10.4 An archaeological watching brief on all groundworks associated with the proposed development (e.g. foundation and service trenches, landscaping, water attenuation) would be an appropriate safeguard, with more extensive mitigation (excavation) being retained in the event of intact and significant remains being encountered during the works. These works can be secured and controlled by a standard condition.
- 7.10.5 While it is likely that the proposed development area may contain archaeological remains of potential regional significance, the overall impact of the new development upon any such remains is considered to be low. This is due to the main focus of development being located in an area known to have been quarried. Comparatively minor development or landscaping is proposed in the area where the natural geology remains intact. As such, the proposed work to be secured by condition is sufficient to ensure that any archaeological interest is conserved, as required by the NPPF.
- 7.10.6 There are no other heritage impacts arising from the development.

7.11 Sustainability

- 7.11.1 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 at the more local level the Dover District Council Adopted Core Strategy supports the incorporation of sustainability measures.
- 7.11.2 **Policy CP5** of the Dover District Council Core Strategy (2010) states that new non-residential development over 1,000 square metres gross floor space permitted after adoption of the Strategy should meet BREEAM 'very good' standard.
- 7.11.3 In this case a BREEAM Assessment has not been conducted for this application. The building has been designed holistically to offer a sustainable solution which is practical and meets the needs of the school within the constraints of a fixed budget. The plans have been designed to ensure that the relevant sustainability measures have been incorporated which meet the objectives of BREEAM 'Very Good' standard and ensures that the principles of sustainable design are satisfied.
- 7.11.4 The specific design of the proposal responds the detailed prescriptive guidance as set out by the EFA Contractor's Framework Facilities Output Specification (extract below). This document sets out that any EFA-led development must demonstrate that passive

design measures have been optimised including fabric first principles and that resources, waste, CO2 emissions and energy demand are minimised.



Building Element	Min Life Expectancy to limit frequency of replacement
Floor Finishes	10 Years
Internal door sets	20 years
Sprinklers	50 years
External walls / cladding	40 years

1.4.5 Sustainable Design and Construction

A sustainable approach to the design, construction and production of all facilities provided by the Contractor, including FF&E, must deliver a cost-effective and resource-efficient School that:

- (a) optimises passive design measures, including fabric first principles;
- (b) minimises the use of all resources;
- (c) reduces the demand for energy and water use during the Works Period minimises waste and CO2 emissions during the Works Period;
- (d) allows opportunities for recycling during the Works Period. The Buildings, grounds and FF&E (including ICT) should optimise the use of low-energy solutions and be designed and constructed to respond to specific Site constraints and opportunities, and to the future impact of climate change¹. The Contractor shall provide the means for the effective measuring and monitoring of the performance of the Building in operation;
- (e) the Contractor's design and construction teams shall design and build the facilities in accordance with BS EN ISO 14001 and shall prepare operational plans for the Authority to operate facilities that record all targets for the key aspects of environmental performance as identified in this FOS. This may include assessment against BREEAM New Construction Education criteria. If BREEAM rating are used the aim should be to achieve a rating of "very good";
- (f) the Contractor shall ensure that the design facilitates an efficient approach to maintenance, life cycle replacement and facilities management, so that these can be provided in a cost effective way. There should be no inaccessible areas which are either difficult to clean or difficult to supervise.

EFA Contractor's Framework Facilities Output Specification, Page 16

7.11.5 This document is a fundamental part of the delivery programme for new education development via the EFA and has proven extremely successful in delivering much needed school buildings and facilities. It is not possible for the scheme to commit to BREEAM certification in this instance due to the considerable cost and time constraints

that the process introduces. To do so, would jeopardise the very tight programme and economic viability of the scheme within the strict EFA delivery programme, but the absence of BREEAM certification in itself does not have a bearing on the sustainable credentials and performance of the development.

- 7.11.6 As detailed within the Design & Access Statement, a passive design strategy has been adopted to optimise energy performance and reduce the scheme's carbon footprint. Further details of the design strategy have been set out in the accompanying Design and Access Statement.
- 7.11.7 The clear identified educational need and significant benefits that the scheme will deliver, together with the delivery implications on programme and cost that a BREAAM requirement would introduce, represent significant material considerations of considerable weight that justify a departure from the strict requirements of Policy CP5 in this instance.
- 7.11.8 In other respects, the development contributes directly to realising all three strands of sustainability as outlined within the NPPF. In economic terms, the development will support construction and other related jobs and in the long-term, improve local education provision to the benefit of the local economy and skills-base of the workforce. Socially, the provision of enhanced school facilities on a single site will provide better co-ordinated provision within a high quality environment that will optimise the teaching and learning experience to enable students to realise their full potential. It will also enable wider and enhanced community use of the facilities, including improved sports offer to the benefit of health and wellbeing. Environmentally, the existing aged building will be replaced by an energy efficient development through passive design that will reduce energy usage and carbon footprint. A Travel Plan is provided that will encourage sustainable travel and new planting and habitat enhancement works will also be delivered.
- 7.11.9 In this respect, and given the 'great weight' to be afforded to education development such as this, it can be seen that the proposal constitutes sustainable development as defined by the NPPF and should therefore benefit from the presumption in favour.

8 Summary and Conclusions

8.1 Overview

- 8.1.1 This planning statement has been prepared on behalf of our client Kier Construction to accompany a detailed planning application for the consolidation of Castle Community College to one site at the school's existing campus at Mill Road, Deal and the consequent redevelopment of the site.
- 8.1.2 The development will represent significant improvements to the existing facilities which are outdated and will provide a high quality teaching and learning environment with opportunities for greater community use. The development satisfies the specific exception criteria of Core Strategy Policy DM25 and also delivers a net increase in open space across the site.
- 8.1.3 The development responds to site constraints through the proposed design and layout, mitigating against impacts on ecology, tree loss, residential amenity, highways, archaeology and contamination. A suite of detailed technical assessments and reports have informed the application and demonstrate that it will not give rise to any significant environmental or other impacts.
- 8.1.4 The NPPF is clear in giving great weight to new school development and in introducing a presumption in favour of sustainable development. The proposal contributes towards achieving all three strands of sustainability whilst according with relevant policies of the development plan and accordingly should benefit from this presumption

8.2 Conclusion

- 8.2.1 Given the above, it is formally requested that planning permission be granted, subject to appropriate conditions.