
**PROPOSED REDEVELOPMENT OF THE FORMER 'THE ROYAL SCHOOL FOR DEAF CHILDREN' SITE:
ERECTION OF NEW 6 FORM OF ENTRY SECONDARY SCHOOL INCLUDING A NEW PART 2 AND PART 3-
STOREY SCHOOL BUILDING, A NEW SPORTS HALL, NEW OUTDOOR PLAYING PITCHES INCLUDING NEW
MULTI USE GAMES AREAS, RECONFIGURATION OF PEDESTRIAN AND VEHICLE ACCESS
ARRANGEMENTS, NEW CAR PARKING ARRANGEMENT, AND ASSOCIATED LANDSCAPE WORKS**

THE (FORMER) ROYAL SCHOOL FOR DEAF CHILDREN, VICTORIA ROAD, MARGATE, CT9 1NB

July 2021

Prepared for:

Bond Bryan Architects

On behalf of 'The Kent County Council' (The Applicant)

Prepared by:

Resolution Planning

Beckett House

14 Billing Road

Northampton

NN1 5AW

CONTENTS

1. **Introduction**
2. **The Need for the Proposed Development**
 - The Education Needs Case
3. **Site and Surroundings**
 - Site and Surroundings
 - Planning Designations
 - Site Planning History
4. **The Proposed Development**
5. **Planning Policy**
 - The Development Plan
 - Other Non-Development Plan Policy and Background Documents
6. **Planning Assessment**
 - A) Impact on Conservation Area
 - B) Principle of Development
 - The Need for a New School*
 - Proposed Land Use*
 - C) Design and Impact on Local Amenity
 - Siting and Layout*
 - Scale, Massing and Height*
 - Appearance and Materials*
 - Trees and Landscaping*
 - D) Transport
 - Access*
 - Parking*
 - Off-Site Improvements*
 - Trip Generation*
 - Travel Plan*
 - E) Other Considerations
 - Ecology*
 - Archaeology*
 - Noise Impact*
 - Air Quality*
 - MUGA Floodlighting*
 - Sustainability*
 - Community Use*
7. **Summary and Conclusions**

1. INTRODUCTION

- 1.1 Resolution Planning has been instructed by Bond Bryan Architects, on behalf of 'The Kent County Council' (The Applicant), to submit a planning application for the proposed redevelopment of the site of the former Royal School for Deaf Children to create a new 6 Form of Entry Secondary School. The application site is located on Victoria Road, CT9 1NB; as identified on the enclosed Site Location Plan.
- 1.2 The proposal involves redevelopment of the site, and the erection of a part 2 part 3-storey school building, a new standalone sports hall, new outdoor playing pitches and new Multi Use Games Area, reconfiguration of pedestrian and vehicle access arrangements, new car park arrangement to provide a total of 136 car parking spaces, and associated landscape works.
- 1.3 The proposed new school is designed to have a total capacity of 900 students, plus a Specialist Resourced Provision (SRP) capacity of 20 students (920 students total), and a FTE staff number of 100.
- 1.4 A separate 'Prior Approval' application is being submitted to Thanet District Council to enable the demolition of the existing vacant buildings.
- 1.5 This statement seeks to demonstrate that:
- (i) There is a clear and robust education need for this development in this area;
 - (ii) The proposed development successfully balances the need to provide additional secondary school places with the need to protect and enhance local amenity;
 - (iii) The proposal represents a high-quality development that will improve the quality of education provision in the area and enhance the overall appearance and character of the site; and,
 - (iv) The proposal will not have any unacceptable adverse impact on surrounding amenity with particular reference to nearby residential use and the Margate Conservation Area.
- 1.6 The plans for the proposed development have been prepared following a pre-application consultation period with planning officers from KCC and Thanet District Council and officers from KCC Highways. The scope of the planning application, and associated technical assessments, have been agreed with planning and highways officers prior to submission as listed below:
- Regulation 3 Application Form plus Ownership Certificate
 - A full suite of detailed Drawings and Visuals
 - Planning Statement
 - Statement of Community Involvement
 - Design and Access Statement
 - Heritage Statement
 - Archaeological Desk-Based Assessment
 - Transport Assessment
 - Outline Travel Plan
 - Arboricultural Impact Assessment, Method Statement, and Tree Survey

- Phase I Ecology Report, and Ecological Mitigation Report
- Bat Survey Report 2020 and 2021
- Reptile Survey Report, and Reptile Mitigation Report
- Drainage Strategy
- Flood Risk Assessment
- Energy Strategy
- External Lighting Report, and External Lighting Concept Plan
- Community Use Statement
- Environmental Noise Assessment, and Operational Noise Impact Assessment
- Air Quality Assessment
- Construction Management Plan
- Schedule of Materials

1.7 **Section 2** of this statement outlines the background education need case for the proposals, **section 3** describes the application site and surroundings including relevant planning designations and key site planning history, **section 4** sets out the key aspects of the proposed development, **section 5** identifies relevant planning policy, **section 6** comprises the planning assessment of the proposals against relevant planning policy and **section 7** is the summary and conclusions.

2. THE NEED FOR THE PROPOSED DEVELOPMENT

2.1 This planning application has been prepared and submitted following an identified need for additional secondary school places in the district of Thanet. To assist in clarifying this need, KCC (Education) has provided the following justification/education needs case.

The Education Needs Case

- 2.2 Kent County Council (KCC) is responsible for ensuring there are sufficient high quality school places for all learners in the County. At the same time KCC is required to satisfy other responsibilities – to raise education standards and be the champion of children and their families in securing good quality education.
- 2.3 In November 2017 KCC published a Record of Decision to establish a new 6 form of entry secondary school for Thanet and to go out to competition to secure an academy sponsor. Following the competition process, the Secretary of State approved The Howard Academy Trust to run the new secondary school for Thanet, to be established, following KCC's acquisition of the site, on the site of the former Royal School for the Deaf in Margate at Victoria Road, Margate CT9 1NB.
- 2.4 The site was formally owned by the John Townsend Trust, the charity which ran the school and took the decision to close it in 2015 when the Trust went into administration. KCC are also taking this opportunity to include, within the new school, a 20 place Specialist Resourced Provision for students whose primary barrier to learning is Autistic Spectrum Disorder (ASD).
- 2.5 Many of the children who attended the Royal School for the Deaf prior to its closure had severe and complex needs to include hearing impairment. The children who attended the school and lived in Kent were given places in one of Kent's ten Special Schools for pupils with Profound, Severe and Complex Needs when the Royal School for the Deaf closed. Those living in Thanet were offered places at Foreland Fields School.
- 2.6 The majority of children with Hearing Impairment as their only barrier to learning are supported in Kent's mainstream schools or attend a mainstream school with a specialist unit for Hearing Impairment. Schools are supported by the Specialist Teaching and Learning Service. The Specialist Teaching and Learning Services (STLS) include Specialist Teachers and Outreach from Special Schools. The STLS provide advice and training to support settings and schools in improving the outcomes for children and young people with special educational needs and disabilities.
- 2.7 The new school is required to meet the growth in the secondary school aged population and demand for future housing as well as addressing the more recent change in travel to school patterns where a growing number of Thanet children now travel to Sandwich for their Secondary education. As demand for secondary school places in Sandwich and Deal puts further pressure on secondary places from September 2023, it is hoped that the new school in Thanet will enable children to attend school more locally thereby allowing children in Deal and Sandwich to access their local schools.

3. SITE AND SURROUNDINGS (INC. PLANNING DESIGNATIONS AND SITE HISTORY)

The Site and Surroundings

- 3.1 The application site represents a previously developed (brownfield) site used for Use Class D1 Education purposes, and has been vacant since 2015. The site represents the former Royal School for Deaf Children at CT9 1NB, situated to the east of Margate Town Centre.
- 3.2 The former Royal School for Deaf Children was a specialist school which also include ancillary respite care thus there are a number of properties previously used as residential respite facilities situated along Park Crescent Road to the east (Nos. 27 – 37), and one property to the northwest on Victoria Road (No. 54). The predominant established use class of the application site is therefore D1 (Education). These residential / respite properties and their associated curtilages are excluded from the enclosed application site.
- 3.3 The Blue Wave Hydrotherapy Pool and Gym Complex to the north of the application site, was also used by students of the former Royal School for Deaf Children. This hydrotherapy pool complex is being run independently and, although it is in KCC's ownership, it is also excluded from the enclosed application site.
- 3.4 The red line boundary of the application site measures 4.61 hectares.
- 3.5 The site can be essentially split into two distinguishable sections based on ground levels and site layout. The southern section sits on a plateau that is higher than the norther section of the site. This southern section comprises the main built up part of the former school site. It accommodates a series of interconnected, predominantly single storey, brick built buildings previously used for secondary school services. There is also a standalone building previously used to deliver primary school services.
- 3.6 The buildings are generally single storey (except for the Technology Block and Administration Block). The layout provides a series of interlocking courtyards, rooms and residences linked by corridors and several stair cases.
- 3.7 The other section of the site represents the more undeveloped areas to the north and west of the built-up part of the former campus. The northern section represents an open space / recreation area which includes a former sports field and a small but attractive sports pavilion building situated towards Park Crescent Road.
- 3.8 To the west of the main built up part of the former campus is a wooded area adjoining Victoria Road which contains some small scale shed / storage units and some hardstanding area comprising former access points for the site. To the south of this area is no. 50 Victoria Road representing the site caretaker's house, a parking area and a former school playground facility.
- 3.9 On the site's southern boundary is a retaining wall, separating the former school site from an alleyway which runs along the rear-side of properties along Byron Avenue. The ground level of Byron Avenue is therefore much higher than the ground floor level of the former school site.

- 3.10 Surrounding land uses are predominantly residential. The properties comprise a mixture of styles but are generally two-storey in height. To the south are residential properties on Byron Avenue, Shakespeare Road and Sparrow Castle. To the west are residential properties, a cemetery and church. To the north of the application site is the hydrotherapy complex and an adjoining wooded area, immediately north which is residential development on Thanet Road and its associated side roads. To the east of the application site is No.25 Park Crescent Road (residential), and adjoining residential properties. On the opposite side of Park Crescent Road is Dane Park.
- 3.11 The application site is accessed from Victoria Road via two vehicular entrances in the form of an 'in' and 'out' one way system. Currently only one of these is in use. There is also an additional vehicular entrance off Park Crescent Road to the south east of the site, between Nos. 25 and 27 Park Crescent Road, and is used as a service access. When the former school was operational, pedestrians used either of the three vehicle accesses into the school. An additional pedestrian route lies to the northeast of the site from Park Crescent Road.

Planning Designations

- 3.12 Thanet District Council's Local Plan Proposals Map (2018) confirms that the site is entirely within the town's settlement limits, the site not covered by any special protective designation, however the western portion of the application site including the wooded area falls within part of the 'Margate Conservation Area'.
- 3.13 According to the Environment Agency online flood mapping system the entire site falls within Flood Zone 1 which corresponds to a low risk of flooding.
- 3.14 The site does not contain any listed buildings or structures.
- 3.15 According to TDC's online Tree Preservation Order map facility, there are no trees within the site covered by TPO, however some of the tree within the western portion of the site may benefit from Conservation Area statutory protection.

Site Planning History

- 3.16 It is understood that the Royal School for Deaf Children was established on the site in 1862. Whilst there have been a number of later additions, alterations and extensions to the main complex, the majority of these buildings were constructed in the 1960s and 1970s. The site was closed in 2015, and recently purchased by KCC (The Applicant).
- 3.17 A more detailed historical archaeological and heritage account of the site is contained within the accompanying Archaeological Desk Based Assessment and Heritage Statement documents.
- 3.18 A desktop planning history search has been carried out using the Thanet District Council online database of planning applications and decisions. The former school site has been the subject of several applications, the most notable of these are summarised below (most recent to oldest).

- 3.19 Planning permission was granted on 16.12.14 under TDC reference F/TH/14/0913 for '*Erection of roof over internal courtyard*'. This is the last planning record associated with the site.
- 3.20 Planning permission was granted on 16.05.14 under TDC reference F/TH/14/0291 for the '*Alteration of roof and refurbishment of pavilion*'.
- 3.21 Permission was granted on 17.08.12 under TDC reference F/TH/12/0197 for the '*Erection of 2 storey building for use as a Hydrotherapy pool, physiotherapy treatment rooms and cafeteria, with associated facilities*'.
- 3.22 Permission was granted on 12.08.08 under TDC reference F/TH/08/0627 for the '*Erection of a two-storey residential building containing bedrooms with associated kitchens, living rooms, laundry rooms and office accommodation*'.
- 3.23 Permission was granted on 23.08.06 under TDC reference F/TH/06/0620 for the '*Erection of a two-storey residential block containing 40 bedrooms with associated kitchens, living rooms, laundry rooms and office accommodation*'.
- 3.24 Permission was granted on 17.10.05 under TDC reference F/TH/05/0316 for the '*Redevelopment of existing facilities, construction of new college building and high dependency/specialist services buildings and associated residential blocks*'.

4. THE PROPOSED DEVELOPMENT

4.1 The proposed development comprises the redevelopment of the site of the former Royal School for Deaf Children to create a new 6 Form of Entry secondary school. This proposal has been triggered by an identified need for additional secondary school places in the Thanet area as outlined in Section 2 of this Statement.

4.2 The salient aspects of the proposed development are outlined below:

Site-Wide Proposals

- The clearance of all buildings on site apart from No.50 Victoria Road and the cricket pavilion located in the northeast of the site.
- The proposed creation of a new 6FE secondary school (Academy) for 920 students and 100 staff. The school is planned to be opened for September 2023.
- The school will cater for an age range of 11 to 16, with no sixth form provision.
- Creation of a new Specialist Resourced Provision (SRP) focusing on the education development of students with Autistic Spectrum Disorder (ASD).
- Some of the proposed facilities will be available for community use, as per the accompanying Community Use Statement.

New Buildings

- The new school buildings are proposed in the upper plateau of the site in the area currently occupied by the existing school buildings to be demolished.
- The new build elements will be comprised of two standalone buildings:
 - **Building A):** The main school block which accommodates all teaching and administration areas, the SRP facility with a secure outdoor garden and play area, and assembly and dining halls. The teaching block is a three-storey building organised in two staggered teaching wings, along the east / west axis. The majority of the classrooms are organised facing north or south. Following planning pre-application consultations with planning officers, the western teaching wing (being closer to the southern site boundary), was lowered to two storeys to help reduce the impact on existing dwellings to the south of the site.

The new school block will be part 2 and part 3 storeys. The GIA and GEA of the new school block will be 6,054m² and 6,459m². The footprint will be 2,526m².

- **Building B):** The sports hall block, which houses indoor sports facilities and changing rooms. It consists of large double height volumes with blank facades due to reduced daylight requirements, occupies a more discreet and confined area of the site, conveniently accessible from Victoria Road

for community access out-of-school hours. The sports hall is an 18m x 33m, 4 badminton court hall, and can be operated independently from the school to benefit community use.

The GIA and GEA of the new sports hall will be 1,025m² and 1,094m². The footprint will be 1,098m².

- Accordingly, the total proposed new floorspace of the entire development is therefore 7,079m² (GIA) and 7,557m² (GEA), with a total footprint of 3,684m².

Access and Parking

- The main entrance into the school will be situated to the east of the site where the current service access is located off Park Crescent Road. This entrance will provide access to the main staff and visitor car park and drop off areas of the school based on a one-way system. To enable this, works will be required to provide sufficient width for a two-way vehicle access, coach and Service Vehicles.
- No physical changes are proposed to the two existing access points off Victoria Road. For the southern Victoria Road access, this will provide vehicular access to a secondary (smaller) staff car park area also open for community and after school hour use. An additional pedestrian entrance will be retained at the northeast from Park Crescent Road.
- Accordingly, the development does not propose the physical creation of any new entrances, but seeks to regularise, improve and reconfigure the vehicle and pedestrian access points already in place.
- Details of all works required to improve the existing access points to ensure they are policy and safety compliant is documented in the accompanying Transport Assessment.
- The main school car park, accessed from Park Crescent Road will accommodate 110 car parking spaces. The secondary car park (staff and community use only) accessed from Victoria Road will accommodate 26 car parking spaces. That represents a total of 136 car parking spaces, and 7 of these will be disabled bays and 10% of the total will have access to electric charging points. In addition, there will 5 spaces for motorcycles and 96 cycle parking spaces.
- The drop off area, provided around the edge of the main car park will accommodate approximately 12 spaces and will be utilised by parents as a drop off loop during the drop off and pick up periods.
- Service access will be via Park Crescent Road and will provide direct access to “Back of House” areas through an internal link road to the south of the school site, with appropriate turning area and access for refuse collection. It is envisaged that a controlled access gate will allow future proofing and flexible connection from the service yard to the western side of the school and for emergency access.

Outdoor Recreation Area

- The lower plateau of the site will accommodate the outdoor pitches and MUGA. These areas will also be open for community use outside school hours. The MUGA has been deliberately sited as far away as possible from residential properties to minimise disturbance caused from sports activities.

- The existing grass embankment and level change is to be retained with the introduction of stepped access/ ramps and grass/ seating terraces leading down to the sports pitches and enclosed MUGA facility. The existing grass area will become the school playing field which can accommodate one full size grass football pitch for Under 16s. To the west of this will be an enclosed floodlit MUGA facility.
- The overall sports provision within the site will provide (as a minimum) the following:
 - 1No. Full Size Under 16s Grass Football Pitch
 - 1No. Mini Rugby / Practice Pitch (on football pitch)
 - 1No. Mini Soccer Asphalt Pitch (within MUGA)
 - 2No. Full Netball Courts (within MUGA)
 - 2No. Five a Side Football Pitches (within MUGA)
 - 2No. Full Basketball Pitches (within MUGA)
 - 3No. Full Tennis Courts (within MUGA)
- There is also be further capacity within the playing field / pitch to provide summer sports pitch layouts such as rounders, softball and athletic field sports.

Landscaping

- A varied amount of landscape structure exists within the site, consisting of self-established open natural grassland, native scrub and shrub layers and a richly diverse number of mature trees ranging from Evergreen Oak, Sycamore, Maple and similar broadleaves to the west and central, with further character groups of Birch and Pine species to the east.
- The intention is to retain and protect as much of the site's green infrastructure as possible. This will be paramount to a successful landscape and will allow the opportunity to enhance natural corridors and provide new green links through the site from east to west and north to south.
- A key feature will also be the use of the existing landform and drop in levels from the new building down to the existing sports pitches. The design principle for this treatment will be to follow the green structure extensions and create modelled landforms.
- Retention of existing vegetation, grassland habitats and trees, with particular emphasis on larger trees at the western end of the site is intended, also to ensure the protection of the Margate Conservation Area. Further trees at the Eastern end of the site are retained to create a continual evergreen wooded character zone that will flow (with new tree planting) into the grass bank landform area.
- As noted in the accompanying Arboricultural Impact Assessment, a total of thirteen individual trees, ten tree groups and four partial tree groups require removal to facilitate the proposed re-development. A total of six individual trees and two tree groups have been recommended for removal due to existing defects rendering them unsuitable to retain, regardless of the site's redevelopment.

- The initial landscaping proposals include a total of sixty new specimen trees to be incorporated throughout the redevelopment.
- 4.3 The proposed development has been fully illustrated on the submitted drawings and a further more detailed description of development is provided in the accompanying Design and Access Statement.

5. PLANNING POLICY

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990 requires all planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. The Development Plan in this case comprises the Thanet Local Plan, with relevant policies identified below.
- 5.2 In addition to the Development Plan other policy documents such as the National Planning Policy Framework (NPPF), the National Planning Practice Guidance (2014) and local level Supplementary Planning Guidance notes also represent material considerations in the assessment of proposals. Accordingly, relevant policies from non-development plan documents have also been identified below.

The Development Plan

Thanet District Local Plan, 2020

- 5.3 The TDLP Proposals Map (2018) confirms that the site is not covered by any restrictive planning designation other than its western portion being within part of a wider Conservation Area.
- 5.4 Part of the overarching vision within ‘Local Plan Strategy’ states that the authority recognises that any growth in Thanet must be supported by the necessary infrastructure, such as schools and health facilities (paragraph 32).
- 5.5 A number of objectives are set out within the Local Plan’ ‘Strategic Priority 1’ which includes the need to facilitate the provision of accessible, modern and good quality schools (paragraph 35).
- 5.6 Policy SP27 (Green Infrastructure) states all new development proposals should, where possible, safeguard and enhance Thanet’s green infrastructure network.
- 5.7 Policy SP35 (Quality Development) states that all new development will be required to be of a high quality and inclusive design.
- 5.8 Policy SP36 (Historic Environment) states the Council will support, value and have regard to the historic or archaeological significance of heritage assets.
- 5.9 Policy SP37 (Climate Change) states that new development must take account of the need to respond to climate change.
- 5.10 Policy SP38 (Healthy / Inclusive Communities) states that proposals will be supported that bring forward accessible community services and facilities, including new health facilities, and proposals that safeguard open space, sport and recreation.

- 5.11 Policy SP42 (Schools) states that the Council will support the expansion of existing and development of new primary and secondary schools to meet identified needs and will work with Kent County Council in identifying appropriate sites.
- 5.12 Policy SP43 (Safe / Sustainable Transport) states that the Council will promote facilities that encourage walking and cycling.
- 5.13 Policy SP45 (Transport Infrastructure) states that schemes may be required to contribute to capacity improvements to the cycle network, provision of pedestrian links with public transport routes and promote electric vehicle charging points.
- 5.14 Policy GI05 (Protection of Playing Fields and Outdoor Sports Facilities) states development will not be permitted on playing fields or on land last used as a playing field unless one of several exception tests are met, which includes a proposal for an indoor or outdoor sports facility.
- 5.15 Policy QD01 (Sustainable Design) states that all new buildings must be designed to reduce emissions of greenhouse gases and have resilience to function in a changing climate.
- 5.16 Policy QD02 (General Design Principles) sets out a number of design criteria that all new development must satisfy. This includes the need for new development to relate to the surrounding development, form and layout. Development should be well designed, respect and enhance the character of the area. Existing features including trees, natural habitats, boundary treatments and historic street furniture and/or surfaces that positively contribute to the quality and character of an area are should be retained, enhanced and protected where appropriate. Trees and other planting is incorporated appropriate to both the scale of buildings and the space available.
- 5.17 Policy QD03 (Living Conditions) states new development should be compatible with neighbouring buildings and spaced and not lead to unacceptable living conditions through overlooking, noise or vibration, light pollution, loss of natural light of sense of enclosure.
- 5.18 Policy HE01 (Archaeology) states that developers should submit information with the planning that allows an assessment of the impact of the proposal on the significance of the heritage asset, which can be in the form of a desk-based assessment.
- 5.19 Policy HE02 (Conservation Areas) states that proposals must not lead to an unacceptable impact on the setting, character and appearance of such heritage assets.
- 5.20 Policy CC02 (Surface Water Management) states that new development is required to manage surface water resulting from the development using sustainable urban drainage systems wherever possible.
- 5.21 Policy CC05 (District Heating) states support will be given to the inclusion of district heating schemes in new development.

- 5.22 Policy SE05 (Air Quality) states all major scheme should promote the use of sustainable local emission transport to minimise the impact of vehicle emission on air quality. Some developments will be required to submit an Air Quality and/or Emission Mitigation Assessment.
- 5.23 Policy SE06 (Noise Pollution) states that new proposals should not lead to an unacceptable noise impact on local amenity.
- 5.24 Policy SE08 (Light Pollution) states that proposals which include new outdoor lighting will be permitted if it can be demonstrated there is no adverse impact on residential amenity and the character of the surroundings.
- 5.25 Policy CM01 (Community Facilities) states that the Council will support new community facilities provided that they are in keeping with the character of the area, and would not significantly impact on the amenity of neighbouring residents.
- 5.26 Policy TP02 (Walking) states that new development will be expected to be designed to facilitate safe and convenient movement by pedestrians.
- 5.27 Policy TP03 (Cycling) seeks to support proposals that will enhance the network of cycle routes and encourage cycling.
- 5.28 Policy TO06 (Car Parking) states development will be expected to make satisfactory provision for the parking of vehicles, including disabled parking. Parking provision should follow the guidance set out in Kent Vehicle Parking Standards 2006.

Other 'Non-Development Plan' Policy and Background Documents

National Planning Policy Framework, 2019

- 5.29 At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 11).
- 5.30 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 (paragraph 94).
- 5.31 Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless a) it is surplus to requirements; or b) any loss would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision' (paragraph 97).
- 5.32 All developments which generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment and travel plans should be used where appropriate (paragraph 111).
- 5.33 Good design is a key aspect of sustainable development and should contribute positively to making places better for people (paragraph 124).

- 5.34 The NPPF states that site-specific flood risk assessments will be required to accompany proposals relating to sites that are of 1 hectare or greater within Flood Zone 1 (paragraph 163).
- 5.35 Local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting (paragraph 189).

DCLG Policy Statement Planning for School Development, 2011

- 5.36 The Statement outlines the Government's belief that the planning system should operate in a positive manner when dealing with proposals for the creation, expansion and alteration of state-funded schools. The Statement requires Local Authorities to apply a presumption in favour of the development of state-funded schools, as expressed in the NPPF.
- 5.37 It states that 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.

Sport England's 'A Sporting Future for the Playing Fields of England'

- 5.38 Policy P1 states that '*Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of, all or any part of a playing field, or land last used as a playing field in an adopted or draft deposit local plan, unless, in the judgement of Sport England one of the specific circumstances applies*' (the circumstances are summarised below):
- E1 A carefully quantified and documented assessment of current and future needs has been demonstrated that there is an excess of playing field provision in the catchment, and the site has no special significance of sport;
 - E2 The proposal is ancillary to the principal use of the site as a playing field;
 - E3 The proposal 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 which would be lost 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 proposal is for an indoor or outdoor sports facility, the benefit of which would outweigh the loss of any paying field.

KCC Vehicle Parking Standards, 2006

- 5.39 This document no longer has any planning status since it was based upon the former Kent and Medway Structure Plan 2006 which has now been superseded. However, KCC highways continues to use this document as a guide until new standards are adopted.
- 5.40 For primary and secondary schools, the maximum vehicle parking standards are one space per member of staff plus ten percent.
- 5.41 The standards for impaired mobility parking spaces for a car park with 50 to 200 spaces are set at three designated spaces or six percent of the total parking capacity, whichever is greater.
- 5.42 Minimum cycle parking standards for secondary schools are set at one space per seven pupils.
- 5.43 The standards for motorcycle parking stipulate that a minimum of one space plus one space for every 20 car parking spaces should be provided.

6. PLANNING ASSESSMENT

6.1 Section 38 of the Planning and Compulsory Purchase Act 2004 states that decisions on planning applications *'must be made in accordance with the [development] plan unless other material considerations indicate otherwise'*.

6.2 This section will assess the suitability of the proposed development against relevant planning policy identified in the previous section. To assess the appropriateness of the proposals, a number of key planning issues have been identified. In particular, is the need to justify the principle of development and its impact on the Conservation Area. Accordingly, the key planning considerations of this proposal are considered to be as follows:

- A) Impact on Conservation Area
- B) Principle of Development
- C) Design and Impact on Local Amenity
- D) Transport; and,
- E) Other Considerations.

6.3 Each of the above considerations are addressed in turn below.

A) Impact on Conservation Area

The Margate Conservation Area

6.4 The Margate Conservation Area encroaches into the western portion of the application site. Within the site, the boundary of this heritage asset covers a wooded area which includes internal hardstanding access roads and some small scale / dilapidated storage sheds / huts, and the site caretaker's dwelling at No.50 Victoria Road. The CA also covers the western boundary of the site which is denoted by a low-level brick built boundary wall with ornate pillar features and iron gates marking the site's existing vehicle / pedestrian entrance point along Victoria Road.

6.5 The proposed development includes minimal changes to this part of the site. The dilapidated shed / storage structures which make no contribution to the setting of the CA will be removed on health and safety grounds, and they would serve no purpose as part of the new secondary school campus.

6.6 The low-level brick wall and extensive soft landscaping that characterises the western boundary of the site will remain unaltered and this essentially prevents any view into the site from the Victoria Road frontage. As noted in the enclosed Heritage Statement, the removal of the existing school buildings and replacement with a new secondary school will not have any impact on the appearance, setting and character of this part of the CA as the proposals have no intervisibility with the Conservation Area.

6.7 A more detailed account of the impact of the proposals on the significance of this heritage asset is documented in the accompanying Heritage Statement.

6.8 In light of the above, it is considered that the proposals satisfy Local Plan Policies SP36 and HE02, and associated guidance within the NPPF.

B) Principle of Development

The Need for a New School

6.9 As demonstrated in Section 2 of this Statement, The Applicant has provided a clear justification and needs case for this development. In short, the new school is required to meet the growth in the secondary school aged population and demand for future housing as well as addressing the more recent change in travel to school patterns where a growing number of Thanet children now travel to Sandwich for their secondary education.

6.10 As detailed in section 5 of this Statement, great emphasis is placed within planning policy generally on the need to ensure adequate measures are made by local authorities to support the expansion of existing schools where a need is identified. In this instance, the NPPF, the DCLG policy statement 'Planning for School Development' contain planning objectives that seek to protect existing school sites and support new facilities where necessary, providing other planning objectives are not prejudiced.

6.11 These national objectives are echoed at local level within the Thanet District Local Plan, where the 'Local Plan Strategy' and 'Strategic Priority 1' states there is a need to facilitate the provision of accessible, modern and good quality schools. This aligns with the NPPF, at paragraph 94, stating that the Government is committed to ensuring a sufficient choice of school places is available to meet the needs of existing and new communities.

6.12 Based on the above, it is considered that a clear needs case exists for the redevelopment of this former education site for a new secondary school. Furthermore, it is considered that significant weight must be given to this 'needs case' in the overall assessment of the application given the great importance placed in supporting and delivering adequate education facilities within planning policy.

The Proposed Land Use

6.13 As noted, the site is located inside the town settlement limit boundary and represents an established brownfield site. The permitted and lawful use of the site is Class D1 (education). The proposed development will maintain the existing use of the site as a new Class D1 (education) facility.

6.14 On this basis, the proposal should be compatible in principle with its adjoining/neighbouring occupants given the existing established use of the site, subject to detailed matters/impacts being acceptable as will be addressed later in this section.

6.15 Accordingly, the proposed 'land use' is appropriate for this location.

6.16 In light of the above, the principle of development is considered acceptable in line with Local Plan Policies SP38, SP42 and CM01 and associated guidance within the NPPF.

C) Design and Impact on Local Amenity

6.17 The proposed development has been designed following pre-application consultations with Thanet District Council (Planning and Conservation), KCC Planning, KCC Highways and local stakeholders. The project team objective and overall design philosophy was to achieve an appropriate balance between (i) the need to facilitate a new secondary school to address an identified demand for a new education facility (ii) the need to protect and enhance the quality of the local environment. This section assesses the design principles of the scheme and the resultant impact on local amenity.

Siting and Layout

6.18 As part of the design development several layout options were considered exploring different building block arrangements and outdoor play area locations as well as the relationship of massing to the neighbouring residential properties. The irregular boundary, the topography of the site and the split levels within the site pose limitations on the layout options and building arrangement.

6.19 Essentially, it was deemed the best solution would be to position the new school block on the previously built up part of the site, where there are existing school buildings to make effective use of brownfield land, and use (retain) the green open space area to the north to serve as outdoor recreation and sports area for the new school.

6.20 The Conservation Area restricted any development options to the west of the site. In addition, the existence of mature trees to the west, north and north east created a further spatial and landscape constraints, which all helped to inform the final siting and layout of the detailed proposals.

6.21 It was deemed the ideal and best orientation for the new school block is along the east/west axis so that the majority of classrooms have a north/south aspect. The design had to take under consideration the proximity of the residential properties to the south and overlooking issues that may arise from the location of the new school complex.

6.22 The sports hall, which consists of double height volumes with blank facades due to reduced daylight requirements, occupies a more discreet and confined area of the site, conveniently accessible from Victoria Road for community access out-of-school hours.

6.23 The new main access for the school complex is proposed from the east utilising the existing service access road that directly leads to the staff & visitor carpark and drop off area.

6.24 The distance between the elevations of the new school building and the new sports block and the nearest residential properties, in all directions, are sufficient to ensure that there is no risk of harming the amenity of local residents; and the proposed relationship will not be significantly different from the existing school site and the nearest residential development.

- 6.25 The MUGA facility has been sited on an area of the existing open space area which is not likely to be used as playing field. This also represents an ideal location as it is a sufficient distance from residential properties to help minimise the impact of the MUGA floodlighting. The MUGA is also deemed to be an ancillary and compatible facility to a school playing field.
- 6.26 Accordingly, it is considered that the proposed siting and layout of development satisfies the requirements of Local Plan Policies SP27, SP35, GI05, QD02, QD03 and HE02, and NPPF objectives that promote good quality design standards.

Scale, Massing and Height

- 6.27 Being located on an urban site the project team had to carefully consider the design of the massing to control the visual impact on the surrounding areas. Some of the alternatives investigated created a large monolithic block with a severe visual impact while others formed a complex with extensive spread that covered a large area of the site reducing and fragmenting the external spaces.
- 6.28 The new school buildings are proposed in the upper plateau of the site in the area currently occupied by the existing school buildings to be demolished.
- 6.29 The school complex comprises of two blocks; A) the teaching block which will be a part 2 and part 3-storey building organised in two staggered teaching wings, and B) a new sports hall block which will have the appearance of a 2-storey structure.
- 6.30 Section 5 of the Design and Access Statement contains a number of site cross section diagrams to understand the relationship of the new school buildings with the nearest residential properties on Byron Avenue to the south insofar as height, scale, level changes and separation distances.
- 6.31 Essentially, the main bulk of the three-storey aspect of the new school block has been sited as far away as practicably possible from the site's southern boundary / Byron Avenue dwellings, whilst avoiding any encroachment into the school playing field to the north.
- 6.32 The shortest distance between the new school block's three storey elevation and the closest rear two-storey elevation of dwellings on Byron Avenue will be approximately 23m. The same distance would apply to the new school's two storey aspect. Bearing in mind the ground level of the application site is much lower than the ground level of Byron Avenue, the impact of these storey heights on the (rear elevation) outlook of Byron Avenue properties will be lessened and should not be considered unacceptable.
- 6.33 The site sections actually show that the proposed new school block is to be sited further away from the southern boundary when compared with the existing school buildings on site, which again should help to reduce the impact of the proposals on local residential amenity.
- 6.34 e cross section 'D-D' shows that there will be a separation distance of approximately 12.4m between the new sports block and the nearest dwelling on Byron Avenue (no.2). Again, there is a level change in this part of the

site which will help to reduce the impact of this building on neighbouring amenity and there is to be landscaping in between the two land uses which will help to enhance screening to protect visual amenity and limit disturbance.

6.35 The scale of the proposed parking area and drop off facility has been dictated by planning policy which sets out required standards associated with secondary school development.

6.36 It is therefore considered that the proposed scale, massing and height of the development satisfies the requirements of Local Plan Policies SP35, QD02 and QD03, and associated guidance within the NPPF concerning high quality design and protecting local amenity.

Appearance and Materials

6.37 The material palette of the proposed buildings has been selected to a) offer a robust solution with architectural integrity and b) inject a fresh and modern look to improve the appearance of the site.

6.38 The D&A Statement also recognises that the elevation treatment secures long-term flexibility for the school, enabling internal adaptations as the curriculum and delivery methods evolve.

6.39 The palette of external materials shall create a minimal contemporary look for the building to match the character of a modern educational institution, ensuring longevity of the facades and minimum long term maintenance.

6.40 Located in a coastal town, it was felt essential to create a site-specific material concept for the building externally and internally, by replicating visual qualities of elements of the seaside such as the whiteness and shadows & textures of the chalk cliffs, the repetition of the beach huts, timber and bronze of the sea vessels, and the subtle tonal colours of the ocean.

6.41 The lightness of the cladding along with the alternating linear pattern of the panels will give a sense of lightness providing texture and a gentle changing shadow effect on the elevations throughout the day.

6.42 The difference in height and materiality of the blocks (two tone cladding / brick) provides variety and articulates the massing of the complex.

6.43 In light of the above it is considered that the overall appearance of the new school, through carefully selected materials, is acceptable and appropriate for the location in line with Local Plan Policies SP35 and QD02, and NPPF objectives in relation to good design.

Trees and Landscaping

6.44 The overall objective of the Landscape Proposal is to create an appropriate setting for the new 900 pupil Academy School, which considers the sensitivity of the existing site parameters, local context, fulfils statutory requirements and government guidance for Schools.

- 6.45 Externally throughout the site there exist a number of well-developed soft landscape areas and level zones that can be utilised to serve the appropriate functions for the school's outdoor spaces, including the current sports pitch area.
- 6.46 The centralised position of the building will lend itself to provide external spatial allocation from all directions, that will create a “Front of House” and “Back of House” setting.
- 6.47 A varied amount of landscape structure exists within the site, consisting of self-established open natural grassland, native scrub and shrub layers and a richly diverse number of mature trees ranging from Evergreen Oak, Sycamore, Maple and similar broadleaf's to the west and central, with further character groups of Birch and Pine species to the east.
- 6.48 The intention is to retain and protect as much of the site's green infrastructure as possible. This will be paramount to a successful landscape and will allow the opportunity to enhance natural corridors and provide new green links through the site from east to west and north to south.
- 6.49 As noted in the accompanying Arboricultural Impact Assessment, a total of thirteen individual trees, ten tree groups and four partial tree groups require removal to facilitate the proposed re-development. A total of six individual trees and two tree groups have been recommended for removal due to existing defects rendering them unsuitable to retain, regardless of the site's re-development.
- 6.50 The proposed layout offers ample opportunity for both replacement and additional tree planting during the soft landscaping phase of development. The detailed soft landscaping proposals (including species selection and planting stock sizes) are yet to be provided. However, the initial landscaping proposals include a total of sixty new specimen trees to be incorporated throughout the re-development.
- 6.51 In light of the above it is considered that the proposed is acceptable in respect of its impact on immediate and wider character of soft landscaping in accordance with Local Plan Policies SP27, SP35, GI05, QD01 and QD02.

D) Transport

- 6.52 This proposal follows pre-application discussions with Kent County Council's Highways officers. This planning application is accompanied by a Transport Assessment which considers the implications of the development on the highway network in respect of traffic movements and safety, and on the level of parking required to support the new school. A summary of the key findings is provided.
- 6.53 To recap, the proposals comprise the demolition of the existing school buildings and the development of a new 6FE secondary school at the former Royal School for Deaf Children on Victoria Road, Margate. The school will accommodate a total of 900 pupils, 20 SEN pupils and be supported by a total of 100 members of staff.

Access

- 6.54 Primary access to the site will be taken from Park Crescent Road using the existing service entrance. It is proposed that the southern Victoria Road access be retained and utilised for two-way vehicle movements to a smaller staff / visitor car park. The primary vehicular access will provide access to the main staff / visitor car park as well as the pupil pick up / drop off provision.
- 6.55 The existing access on Park Crescent Road will be relocated to the northwest slightly and widened to six metres, with a three metre-wide shared footway / cycleway provided on the western side of the carriageway. This access is provided with a visibility splay of 2.4 x 43 metres to the east and a visibility splay of 2.4 x 43 metres to the west which is in compliance with the Manual for Streets (MfS) standards for a 30mph road.
- 6.56 In terms of the amendments to the southern access on Victoria Road, white lining will be provided to delineate between the entry and exit lanes and also to give priority to 'in' movements through the existing gates. The existing pedestrian railing to the south of the access will be removed to accommodate vehicle tracking. The proposed access design drawing is included at Appendix F. This access will be a vehicle only access and signage will be provided to make pedestrians aware of this.
- 6.57 With regard to pedestrian access to the site, as noted it is proposed that a shared footway / cycleway will be provided on the western side of the main vehicular access on Park Crescent Road. Use will also be made of the existing, gated pedestrian access to the east of the site, on Park Crescent Road. A further pedestrian access is proposed to the west of the site, utilising the original 'in only' vehicular access on Victoria Road. It is however noted that this gate will be locked and controlled from reception to ensure it is not used as primary pedestrian route into the site.

Parking

- 6.58 The main school car park will provide a total of 110 car parking spaces, five of which will be accessible bays and ten of the spaces will be provided with Electric Vehicle (EV) charging facilities. The proposals will also provide five motorcycle parking spaces. The drop off area, provided around the edge of the car park will accommodate approximately 12 spaces and will be utilised by parents as a drop off loop during the drop off and pick up periods.
- 6.59 The second (existing) car park to the west, accessed from Victoria Road, will contain 26 car parking spaces, two of which will be accessible bays and three will be provided with EC charging facilities. This car park will be for out of school hours community users associated with the playing fields, MUGA and community hall.
- 6.60 With respect to cycle parking, the proposals will provide a total of 96 cycle parking spaces in the form of sheltered Sheffield stands, with 48 spaces located to the east and 48 located to the west of the school buildings.

Off-Site Improvements

6.61 In pre-application discussions, KCC Highways recommended The Applicant to consider potential offsite improvements to the pedestrian and cycle infrastructure in the vicinity of the school site. The following is to be agreed with KCC Highways during the course of this application, with any off-site improvements and contributions to be subject to review by The Applicant:

- i) The footway to the southeast side of Dane Park is approximately five metres in width. It is therefore considered that this footway would be suitable to accommodate a shared footway / cycleway, and this would result in the loss of parking as a number of vehicles currently park on the footway.
- ii) Existing shared facility on St Peter's Road was also reviewed, and it was noted that it currently extends from Broadley Road to Drapers Close. The existing shared facility therefore needs to be extended by approximately 350 metres to Lister Road. It has been advised by KCC Highways that signage needs to be provided for the existing route to be extended and The Applicant would be happy to contribute towards the implementation of this signage.
- iii) Implementation of a crossing point on Park Crescent Road in the vicinity of the site access to provide a safe crossing point for pupils. There is layby parking currently provided along much of the northern edge of Park Crescent Road and therefore approximately 16 spaces would need to be removed for a crossing point to be provided. Following discussions with KCC the crossing will take the form of a zebra and will be provided just to the west of the access.

Trip Generation

6.62 The accompanying TA calculates that the proposed development could attract 185 vehicle movements in the morning peak hour and 171 vehicle movements in the afternoon peak hour. The TA concludes that the proposals would result in a net reduction in vehicle trips in comparison to the existing school, if it were still operational. The proposals would result in a decrease of 394 vehicle movements in the morning peak hour and a decrease of 387 vehicle movements in the afternoon peak hour.

6.63 It is noted that the existing site accommodated the Royal School for Deaf Children and also Westgate College, however data could not be obtained on the existing trip attraction of the site. It was therefore agreed with KCC Highways at the pre-application stage that the trip assessment for the existing school is based on a SEN use. The TA therefore calculates trips associated with the former school site based on an SEN school using comparable examples.

Travel Plan

6.64 The planning application is accompanied by a Travel Plan (draft). The main purpose of this document is to demonstrate a commitment to enhancing and promoting sustainable travel options at the site, and to set out the necessary survey and monitoring requirements needed to support the success of the TP.

- 6.65 The submitted Travel Plan sets a target of a 5% mode shift in private car trips across the whole school including both students and staff.
- 6.66 In due course and within a specified time of the school being operational, the Travel Plan will be finalised and thereafter monitored and reviewed annually to continue to provide a package of measures to promote sustainable transport measures and initiatives.
- 6.67 In light of the assessment and conclusions documented in the accompanying Transport Assessment, it is considered that the proposal is acceptable in respect of its impact on the local highway network and level of parking proposed. Accordingly, the proposal satisfies Local Plan Policies SP45, TP02, TP03 and TP06.

E) Other Material Considerations

Ecology

- 6.68 The submitted Preliminary Ecology Appraisal confirms the proposed development should not have an unacceptable impact on local ecology. The report confirms that the areas of intended development will not directly impact on any sensitive ecological conditions. Any recommendations that are made for detailed surveys will be carried out and submitted prior to the determination of the planning application.
- 6.69 In light of the above, it is considered the proposal satisfies Local Plan Policy SP27.

Archaeology

- 6.70 The enclosed Archaeological Desk Based Assessment concludes that the site is of low archaeological interest given the significant amount of landscaping that has occurred, causing severe disturbance of any potential archaeology. Whilst it is appreciated that in general the area has potential for Prehistoric archaeology relating to the use of the valley in this period, it is considered to be of local significance.
- 6.71 The likelihood of remains surviving are minimal and the current 1970s onwards school buildings are not of any significance with exception to the historical foundation stones. The impact of the new school building and associated features is likely to have a total impact should there be any potentially surviving archaeology.
- 6.72 In light of the above, it is considered the proposal satisfies Local Plan Policies SP36 and HE01.

Noise Impact

- 6.73 The application is accompanied by a Noise Impact Assessment. In summary, it says a MUGA, Football pitch, Main Hall and Sports Hall noise assessment has been carried out with a worst case predicted façade level of 59dB at the nearest sensitive receptor.
- 6.74 As the noise levels at the closest residential dwellings are between the levels where LOAEL and SOAEL may occur, mitigation methods as practically feasible is advised. Mitigation methods include:

- Reduced hours of operation of the MUGA
- Acoustic barriers between the MUGA and the nearest residential receptors.

6.75 In light of the above, it is considered the proposal satisfies Local Plan Policy SE06.

Air Quality

6.76 The accompanying Air Quality Assessment concludes that the proposals would include the following mitigation measures to reduce emissions:

- 1 rapid charge electric vehicle charging point to be provided per 10 parking spaces.
- Travel Plan to encourage the use of more sustainable transport modes and reduce single occupancy car use.

6.77 The report states, based on the results of this assessment and following implementation of the proposed mitigation air quality does not pose a constraint to development of the site for the proposed use.

6.78 In light of the above, it is considered the proposal satisfies Local Plan Policy SE05.

MUGA Floodlighting

6.79 The application is accompanied by an External Lighting Report which sets out the proposed methodology for the selected lighting strategy and provides a site diagram for lighting mapping purposes. The MUGA is to be positioned in the north of the site, at its furthest possible position from residential properties in all directions.

6.80 The floodlighting from the MUGA should not be visible from properties to the north as it will be screened / blocked by the hydrotherapy facility. Likewise, the MUGA floodlighting should not be noticeable to properties to the south on Byron Avenue as it will be screened by the new school block and the sport hall block.

6.81 In this respect, it is considered the proposal satisfies Local Plan Policy SE08.

Sustainability

6.82 As noted in the accompanying Energy Strategy, a range of passive and active energy efficiency measures are to be employed within the development to reduce energy demand. These measures alone show an improvement to Approved Document (ADL 2A) 2013 by 13%.

6.83 In addition, a number of low / zero carbon and renewable technologies have been appraised in terms of technical, physical and financial feasibility for use on the project. Roof mounted photovoltaic technology is considered to be the most favourable for this development. The use PV panels shows a further improvement to Approved Document (ADL 2A) 2013 by 12%.

6.84 The overall predicted reduction in CO2 emissions from the Baseline development model for ADL 2A is 25% which equates to an annual saving of approximately 26 tonnes of CO2. Thus meeting ADL 2A requirements and providing the building with an EPC of A.

6.85 In light of the above, it is considered the proposal satisfies Local Plan Policy SP37.

Community Use

6.86 The proposal incorporates facilities that will be available for out of schools hours community use. Enclosed is a Community Use Statement from the Trust (selected by the Government to run the new school) which states that the proposed academy site has a Main Hall, Drama Studio, Sports Hall, MUGA, football pitches which will be available for hire.

6.87 The academy will hire these areas from 5.00pm – 10.00pm (Monday – Friday) and from 8.30am – 10pm at weekends. Outdoor areas will not be made available for hire past 7.00pm.

6.88 The academy will make its facilities available to local primary schools to provide access to specialist teaching rooms and purpose-built sports areas.

6.89 In this respect, the proposal complies with Local Plan Policies SP38, SP42 and CM02.

7. SUMMARY AND CONCLUSIONS

7.1 The proposal has been developed following pre-application consultations with officers from KCC Planning, KCC Highways, TDC Planning and TDC Conservation / Heritage. This Planning Statement in conjunction with the accompanying technical reports collectively demonstrate the reasons why the proposal should be considered acceptable. These reasons are summarised below:

- A clear and statistical 'needs case' exists for creation of a new secondary school in the Thanet area. The proposed development successfully balances the need to address a local demand for secondary school places with the need to preserve and enhance the quality of the local environment.
- It is demonstrated that the proposal will not have an adverse impact on the setting, appearance and character of the Margate Conservation Area. Any potential harm that may exist will be significantly outweighed by the public benefits that will be secured through this proposed development.
- The principle of development is appropriate, given a) the need for the development; and b) the proposed land use being compatible with the site and surroundings.
- The proposal will not lead to any adverse unacceptable impact on surrounding amenity with regard to the privacy and outlook afforded to local residents.
- It has been demonstrated that the proposal is acceptable by virtue of its siting and layout, scale, massing, height, appearance, use of materials, impact on trees and landscaping.
- The proposal will not lead to any unacceptable impact on traffic or parking.

7.2 Taking all of the above into account, it is considered that the proposed development satisfies all relevant aspects of planning policy at national and local levels and should therefore be granted planning permission.