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Planning Services  
Dover District Council  
White Cliffs Business Park  
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Ref: L0001.5542CA/L001  
Date: 19 October 2023

Dear Sir/Madam,

**SUBMISSION OF AN APPLICATION SEEKING PLANNING PERMISSION FOR THE CHANGE OF USE OF THE 'DINING ROOM' TO A SECURE TRAINING FACILITY (CLASS C2A) WITH ASSOCIATED MINOR INTERNAL REFURBISHMENT WORKS AT THE CITADEL, DOVER.**

On behalf of Dover Citadel Ltd, please find enclosed the application (with the Planning Portal reference PP-12490407) which seeks planning permission for the change of use of the 'Dining Room', The Citadel, Dover to Use Class C2a (Secure Residential Institution).

This covering letter will set out the context of the site, outline the proposed change of use and associated works (which do not require planning consent) and establish the planning policy context.

I can confirm that the requisite planning application fee of £462 (based on the change of use of the building) will be paid under separate cover.

## Application Submission

Full details of the application submission are enclosed within the supporting suite of architectural plans and reports, including as follows:

- Application form and certificates
- Architectural plans
  - 21.099a\_HOL\_DH.001- Site Location Plan
  - 21.099a\_HOL\_DH.002- Existing Block Plans
  - 21.099a\_HOL\_DH.003 - Proposed Block Plans
  - 21.099a\_HOL\_DH.005 - Existing Floor Plans
  - 21.099a\_HOL\_DH.010- Proposed Floor Plans

## Site Background

### Site Context

The proposed development is located within the Citadel, Western Heights, Dover (as per figure 1 below). The Western Heights represents one of the largest and most elaborate surviving examples of nineteenth century fortifications in England and were under continuous military occupation for 170 years. Over time the defensive purpose of the Monument declined, with the Citadel transferred to the Prisons Commission in 1954. It was subsequently adapted and developed for use by HM Prisons Service as a Borstal and Young Offenders Institution. The site had been operational as an immigration centre until November 2015, but there has been no use of the site for any purposes relating to immigration the Prisons Service since this time.

The application site, known as the 'Dining Room', comprises a vacant one-storey building which has previously been in use for active training (Use Class C2a,) specifically as a secure training facility. There is no formal documentation however to prove this use is extant, given its ownership by the Crown. As such, this application effectively seeks to establish and formalise this use as an active training facility.

**Site Location**

As outlined above, 'Dining Room' is located within the Citadel, with its location circled below in figure 1.



Figure 1: The 'Dining Room' Location

This former fortification is located along the crest of a steep chalk ridge, directly to the west of Dover town centre and overlooks the harbour. The Citadel is a 13.4-hectare site located to the western end of the Heights which occupies around 30% of the total area of the fortification. Within this context, the development proposal is located towards the central northern part of the wider site.

In terms of the site's wider context, green slopes are found immediately surrounding the fort. Beyond this, residential dwellings are found to the north, east and south-west of the site. Commercial uses are found to the south-east of the proposed site. To the west is Kent Downs Area of Outstanding Natural Beauty.

### Site Access and Transport Links

The site benefits from good national and international interconnectivity. The site can be accessed from the strategic (trunk) road network via a roundabout connection to the A20 immediately south of the site and the town centre and the county network via Folkestone Road / York Street junction to the north. The site is also internationally connected with Dover port offering crossings to Calais and access to mainland Europe.

Access to the site itself can be achieved via Citadel Crescent. The internal road network of the fortification, which is little changed from the original military layout, comprises a single, steep crossing over the ridge with spurs to east and west.

In terms of public transport, SouthEastern Rail operates out of Dover Priory train station (high speed rail link) which is located within walking distance to the northeast, via a steep, low grade footpath link. This high-speed rail link runs up to 5 services per hour to stations including Victoria, Charing Cross and St Pancras. Other destinations include Faversham and Ramsgate.

### Planning History

As stated above, the site has previously been in use as a secure training facility, however there is no specific planning history relating to the 'Dining Room' given its previous ownership by the Crown.

This is reflected across the site which too has a limited documented planning history. Most recently, there have been three planning approvals for the change of use of Casemates 51, 52, 53 and 54 to Class E uses, as well as a Change of Use application for Sandwich, Romney and Hastings House to secure residential institutions (Use Class C2a).

Fundamentally, this proposal is essentially the same as these recent applications as this proposal is seeking to formalise the use of the 'Dining Room'.

These recent applications referred to above are summarised in the table below. None of these applications relate to the 'Dining Room' itself.

Reference Number	Description of Development	Site Address	Decision
22/00371	Change of use to commercial business use (Use Class E), conversion of 2no. ancillary buildings (A and B) to WCs, infilled windows and lanterns to be opened up, replace existing doors, restore and repaint brickwork	Casemates 51 And 52, West Face And Flank Casemates, The Citadel, Citadel Road, Dover, CT17 9DP.	Granted 19 <sup>th</sup> May 2022
22/00322	Change of use to commercial business use (Use Class E), conversion of 2no. ancillary buildings (C and D) to WCs, infilled windows to be opened, replacement frames/doors to Casemates 7, 8, and 11, restore and replace existing windows, replacement glazing to Casemate 7, restore and repaint brickwork and creation of 2no. additional parking spaces (existing railings to be removed)	Casemates 53 And 54, West Face And Flank Casemates, The Citadel, Citadel Road, Dover, CT17 9DP.	Granted 10 <sup>th</sup> May 2022

Reference Number	Description of Development	Site Address	Decision
22/01553	Change of use to a secure training accommodation (Class C2A) with associated minor internal refurbishment works	Sandwich House, The Citadel, Western Heights, Dover CT17 9DT.	Granted 25 <sup>th</sup> January 2023
23/00791	Change of use to a secure training accommodation (Class C2A) with associated minor internal refurbishment works	Romney House, The Citadel, Citadel Road, Dover CT17 9DT	Granted 9 <sup>th</sup> August 2023
23/00792	Change of use of Hastings House to a secure training accommodation (Class C2A) with minor internal works	Hastings House, The Citadel, Western Heights, Dover, CT17 9DR	Granted 9 <sup>th</sup> August 2023

Table 1: Relevant Planning History within the Citadel

## Proposed Development

### Use

This development proposal seeks full planning permission for the change of use of the 'Dining Room' to be used as a training centre (Class C2a). Although we are applying for a change of use application, the proposal will essentially formalise the existing use of the which has previously been used as a physical activity training facility with and ancillary elements of classroom use.

It is proposed that this training facility will exclusively be used alongside potential users of Romney, Hastings and Sandwich House, which as alluded to above, have recently been granted planning permission for C2a Use. The facility will have a capacity of 40 users and will also see the employment of 5 permanent members of staff, and will provide training space and equipment (i.e. gym equipment) for use in training activities.

### Scale and Massing

The 'Dining Room' is a one storey building which have a total floorspace comprising 984.6sqm. This development proposal only plans to formalise the use of the site, and do not make any physical alterations which impact on the existing scale or mass.

### Layout

The development proposal will see some internal changes, however these would not require planning consent It is proposed that a partition wall will be introduced within the 'Dining Room' to separate some of the physical training facilities from a seminar/classroom. Other ancillary spaces including store rooms, changing facilities and toilets are also to be provided. In total, the proposal will see the delivery of two main activity and classroom spaces each.

Crucially these proposed changes are all internal works and therefore do not require planning permission.

### Design and appearance

The appearance of the building itself will not be altered by this development proposal with no external works proposed.

## Accessibility and parking

Access to the 'Dining Room' will be achieved via internal roads and infrastructure that exists as part of the Western Heights. Given the nature of the design of Western Heights Fortification and the Scheduled Ancient Monument status, the existing access to the site is restricted with various parts of the site secured off from one another. As such, vehicle and pedestrian access is restricted to just one point of entry, via the existing gatehouse bridge. Given this, both pedestrians and vehicle users will follow the same route, using internal roads within The Citadel to access the site.

In terms of parking, it is proposed that 61 car spaces to be made available on the designated hard standing area at the entrance to The Citadel for users of this building as indicated on the submitted plans.

## Planning Policy Context

### National Planning Policy

The NPPF was updated in September 2023 and sets out the Government's proposed economic, environmental and social planning policies for England. This is an iteration of the earlier Framework's which was published in July 2021. The NPPF carries forward the Government's commitment to supporting sustainable economic growth and indicates that significant weight should be placed on the need to support economic recovery through the planning system.

The NPPF confirms in Paragraph 2 that applications for planning permission will be determined in accordance with the Development Plan unless material considerations indicate otherwise.

It also confirms that the NPPF must be taken into account as a material consideration in planning decisions.

The most relevant paragraphs on the NPPF in relation to this application includes Paragraph 120 which states that planning policies and decisions should promote and support the development of under-utilised land and buildings.

Other relevant sections within the NPPF include:

- Achieving sustainable development
- The presumption in favour of sustainable development
- Decision making
- Building a strong and competitive economy
- Promoting healthy and safe communities
- Promoting sustainable travel
- Making effective use of land
- Conserving and enhancing the historic environment
- Conserving and enhancing the natural environment

### Local Planning Policy

The Dover Local Plan comprises the following relevant adopted documents:

- Dover Core Strategy (Adopted Feb 2010)
- Dover District Land Allocations Local Plan Adopted Jan 2015

## Proposals Map

A review of the Dover District Land Allocations Policy Map (Adopted January 2015) identifies Western Heights Fortification as a Scheduled Ancient Monument, albeit the 'Dining Room' is not designated within this. The site is however located within the Western Heights Conservation Area. The site is also designated as subject to Policy LA11 (Dover Western Heights) within the Dover District Land Allocations Local Plan. The Western Heights are also designated outside of Dover's settlement boundary.

The slopes surrounding the site are also designated as a Local Nature Reserve and a Local Wildlife Site for its unimproved chalk grassland.



Figure 2: Proposals Map Extract

The application site is within Flood Zone 1 and, therefore, is at the lowest risk of river or sea flooding.

## Dover Core Strategy (Adopted Feb 2010)

The Dover Core Strategy was adopted in February 2010. This document sets out the Council's vision and spatial strategy for the future development of the District for the period up to 2026. Policies relevant to this application include:

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

**Policy DM4 -Re-Use or Conversion of Rural Buildings** – States that permission will be given for the re-use or conversion of structurally sound, permanent buildings. For proposed developments beyond the confines of Rural Service Centres, Local Centres and Villages, permission will be given for re-use or conversion of such buildings as follows:

- i) For commercial uses
- ii) For community uses in buildings that are closely related or adjacent to the confines
- iii) For private residential use in buildings that are adjacent to the confines.

In all cases the building to be re-used or converted must be of suitable character and scale for the use proposed, contribute to local character and be acceptable in other planning respects.

**Policy DM11 Location of development and travel demands** – conveys how development that would generate travel will not be permitted outside the urban boundaries and settlement confines unless justified by development plan policies. Development that would generate high level of travel will only be permitted within the urban areas in locations that are, or can be made to be, well served by a range of means of transport.

**Policy DM13 Parking Provision** - outlines that provision for parking should be a design led process based upon the characteristics of the site, the locality, the nature of the proposed development and its design objectives. Provision for non-residential development should be informed by KCC Guidance SPG4, or any successor.

**Policy DM16 – Landscape Character** – states development that would harm the character of the landscape will only be permitted if it is in accordance with allocations made in DPD's and incorporates any necessary avoidance and mitigation measures; or it can be sited to avoid or reduce the harm and/or incorporate design measures to mitigate the impacts to an acceptable level.

### Dover District Land Allocations Local Plan Adopted Jan 2015

This development plan document was adopted in January 2015 with the primary purpose aiming to allocate land for development and to set out any issues or criteria that subsequent planning applications will need to address. The Western Heights is such a site what is allocated within this plan, therefore any development within land falling under this allocation is subject to **Policy LA 11 Dover Western Heights**. This policy states:

*“The Council will establish a comprehensive framework for the conservation management of the Dover Western Heights Fortifications Scheduled Monument and Conservation Area. The framework will take the form of a masterplan to be adopted as a Supplementary Planning document. The masterplan will:*

- i) be produced in liaison with landowners, residents, organisations and individuals with an interest in the area, and the public;*
- ii) establish a shared vision for the future of the fortification that preserves and enhances its significance as heritage asset and its landscape and ecological value, whilst securing a sustainable future;*
- iii) identify management initiatives, including any opportunities for development or changes of use that would enhance the public's enjoyment and understanding, that would help realise the vision*
- iv) provide guidance for determining planning and related applications that affect the fortification; and*
- v) provide a basis for future governance of the fortification, including consideration of funding opportunities.*

*Western Heights Landscape Area -Western Heights Scheduled Monument and Conservation Area, where co-ordinated action is needed to fully realise visitor potential whilst ensuring that its heritage and wildlife value is protected and better appreciated.”*

### Dover Western Heights Masterplan - Adopted September 2015

The Dover Western Heights Masterplan was adopted in September 2015 and outlines the vision of enhancing the Western Heights as a destination of national and international significance whilst creating a sustainable future for the fort.

This document outlines that the Citadel is suitable and appropriate area for new development including the re-use and conversion of existing development.

### Emerging New Dover District Local Plan (2020-2040)

Dover District Council is in the process of producing a new Local Plan which, once adopted, will replace the current Development Plan documents. The Dover District Local Plan was submitted for Examination on Friday 31st of March 2023 with a Hearing sessions of the Examination have now been arranged, with the sessions opening at 10.00 am on Tuesday 14<sup>th</sup> November.

Although not yet adopted, some weight can be placed on this emerging Local Plan. Emerging Policy SP6 sets out support for the regeneration of The Citadel including the delivery of a variety of uses at this site. Further to this, **Policy SAP4 7 'Dover Western Heights Fortifications Scheduled Monument and Conservation Area'** supports viable uses which conserve and enhance the significance of the Dover Western Heights heritage asset, and which contribute to delivering a sustainable future for the site including its landscape and biodiversity. Further to this, the policy outlines how developments should:

- a. Take account of the heritage significance, settings, views, biodiversity, character and coherence of the components and elements of this complex, including the intervisibility between different elements of the fortifications within the site and key features in the surrounding landscape;
- b. Make a positive contribution to the character and distinctiveness of this significant heritage asset and capitalise on opportunities to reduce risk across the whole site;
- c. Optimise the opportunities presented by this site to enhance the economic well-being of the town;
- d. Promote and enable the constructive conservation of the built heritage of the site including those elements which are on the Heritage at Risk Register;
- e. Respect the overall historical coherence of this heritage asset and provide support for heritage restoration which delivers exemplary standards of conservation, design and sustainable construction;
- f. Ensure appropriate species and habitat surveys are carried out prior to determination. Survey results will inform layout and design to avoid ecological impacts in accordance with the mitigation hierarchy and to inform on site ecological mitigation, compensation and enhancement measures and proposals for effective implementation, management and monitoring of all such measures;
- g. Enhance awareness and accessibility of this asset for residents and visitors;
- h. Improve connectivity between the fortifications and the town, including, where possible, the delivery of links with the town centre, Dover Priory railway station and the Dover waterfront; and
- i. Be informed by the Dover Western Heights Masterplan SPD 2015.

## Planning Assessment

### Principle of Development



The principle of providing a physical activity facility for training purposes within the Citadel is already established by the previous use of the wider site as Crown property. As judged within the recent consented Houses' applications which also proposed a C2a Use, it is considered that this use would accord with policies DM4 and LA11 and the principle of the development is therefore considered to be acceptable.

Within the Development Plan, Western Heights is recognised as an underused heritage asset and the principle of new uses within the fort is promoted in order to achieve a more productive use of the fortifications, increase its appreciation by the general public and to improve its physical condition. Similarly, to the recently consented Houses' applications, this development proposal will act to bring the fort back into active use, with the proposed use supported by Policy DM4 and LA11, the NPPF (in particular paragraph 120) and Regulation 19 Local Plan Policy SAP4.

Although Policy DM 1 within the Dover Core Strategy does not permit development on land outside urban boundaries, this policy also states that such development can be justified by other development plan policies. Within the Land Allocations Local Plan, Policy LA 11 encourages new and sustainable uses to reinforce the sense of place of the Western Heights, support its heritage restoration and management, and to encourage community involvement. Paragraph 3.136 also reiterates how without such intervention, The Western Heights will continue to be an underused heritage asset in Dover with no long-term use and vulnerable to neglect, decay, vandalism and continued negative consequences on this important heritage asset. Subsequently, development on this site is actively encouraged within Local Planning Policy, thereby satisfying the requirements of Policy DM1. Emerging Local Plan Policy SAP4 7 also continues to support the restoration of The Citadel. As outlined above, within the recent determination of the Houses' applications, this development type and proposed use complies with Policy SAP4.

In terms of the 'Dining Room' itself, this letter has already outlined how the site has previously been in use as a training facility, although due to its nature, there are no planning records. Notwithstanding this, given that this application seeks to formalise this previous use, there are no planning policies which would prohibit the use of the site within Use Class C2a.

This proposal will also secure economic benefits. As aforementioned, the proposal will also see the employment of 5 permanent members of staff. This proposal will therefore contribute towards enhancing economic growth and productivity, thereby providing opportunities to enhance economic benefits across the District in accordance with Local Plan Policy LA11 and emerging Policy SAP4 7.

Overall, this development proposal will support the ambitions outlined both within the Local Development Plan and Western Heights Masterplan as it will promote the restoration of this underutilised and undervalued fort, thereby delivering a long-term sustainable future for The Citadel. We therefore consider that the principle of development is acceptable in accordance with Policies DM4, LA11 and the NPPF Paragraph 120.

### Heritage and Design

The proposed development will only see internal alterations made to the 'Dining Room' which do not require planning permission. No external changes are proposed, thereby generating any adverse impact on the significance of this setting. Therefore, it is not considered that the development would cause any harm to the heritage assets of the site. The proposal thereby does not contradict with the ambitions of Policy LA11 within the Land Allocations Adopted Plan. This judgment was also formed for similar applications associated with Sandwich, Romney and Hastings House.

Additionally, this proposal will provide a positive contribution in delivering a long term, suitable and viable use for the 'Dining Room' and the wider Western Heights fortification whilst ensuring the visitor potential of the site is maximised,

as set out within the Adopted Masterplans vision. As such the proposal is compliant with both national policies including Paragraph 196 of the NPPF and local policies including Policy LA11 within the Land Allocations Adopted Plan.

Overall, the development proposal will not generate significant harm or cause the loss to the significance of this heritage asset but act to enhance it through the proposed refurbishment, therefore this development will provide a positive contribution to the site and the wider character and distinctiveness of the area. As such the development proposal is fully compliant with both NPPF paragraphs 199 and 201m and Local Plan policies DM16 and LA11.

### Ecology

This development proposal only seeks to confirm the use of the 'Dining Room', with minor internal refurbishments made not requiring planning permission. These changes will not impact on the ecology of the site or its surrounding and no adverse effects of habitat sites will be created by the development proposal. As such, this development is compliant with both Paragraph 182 of the NPPF and Local Plan Policy LA11.

### Transport

Although Policy DM 11 within the Adopted Core Strategy outlines that development which would generate travel would not be permitted outside settlement confines, it also acknowledges that this can be justified by development plan policies. Although the 'Dining Room' is currently vacant, the proposal will not have a material impact on trip generation to the site given that proposed users of this facility will already be traveling to site to use Romney, Hastings and Sandwich House. Further to this, Policy LA 11 allocates the site for redevelopment, with point iii) of the within Land Allocations Local Plan supporting opportunities to develop and enhance Western Heights. As such the development proposal is compliant with this local plan policy.

In terms of parking, there is existing ample car parking found at the entrance to The Citadel. This is of an appropriate size and nature to accommodate this proposal, therefore would be compliant with Core Strategy Policy DM 13.

### Conclusion

Overall, the vision of this development is to restore and re-use the 'Dining Room', ensuring the preservation and enhancement of a significant heritage asset by securing a sustainable and long-term future for The Western Heights. As demonstrated in the preceding sections, the principle of this development proposal has been firmly established and is therefore considered to be acceptable. There are also no material considerations that would outweigh the planning policy support for this development, therefore planning permission should be granted without delay in accordance with Paragraph 11 of the NPPF.

Yours faithfully,



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