

Planning Department
Dover District Council
Council Offices
White Cliffs Business Park
Dover
Kent
CT16 3PJ

Our Ref: MB/LP/11002

1 June 2016

Dear Sir/Madam,

**RE LINWOOD YOUTH CENTRE, 92 MILL ROAD, DEAL, CT14 9AG
REQUEST FOR PRE APPLICATION ADVICE**

I refer to the above site, and write on behalf of our clients, Kent County Council to request a meeting and written pre-application advice in relation to a proposal for Residential Development at Linwood Youth Centre, Deal.

This enquiry comprises the following:

- Drawing No. DHA/11002/01: Site Location Plan;
- Drawing No. DHA/11002/02: Site Analysis Plan;
- Drawing No. DHA/11002/03: Existing Site Layout Plan;
- Drawing No. DHA/11002/10: Proposed Site Layout Plan;
- Drawing No. DHA/11002/11: Indicative Access Section;
- Drawing No. DHA/11002/12: Indicative Site Massing Section;
- Tree Survey;
- Preliminary Ecological Appraisal and Bat Survey;
- I can confirm that KCC will make the £500 pre-application fee payment direct and request that upon receipt of this letter, the corresponding reference is confirmed with us to facilitate this.

Site, Surroundings and Background

The proposed site is a parcel of land of approximately 0.22 hectares in area, fronting on Mill Road (B2056). The site is situated approximately 1.3km to the south west of Deal Town Centre and is within its urban built confines. The site is currently operational as Linwood Youth Centre.

The site consists of a two storey building on the road frontage with a large one storey storage shed

dha planning

Eclipse House, Eclipse Park, Sittingbourne Road
Maidstone, Kent ME14 3EN

t: 01622 776226 f: 01622 776227

e: info@dhaplanning.co.uk w: www.dhaplanning.co.uk

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and minibus shed. Parking is located to the north western aspect.

The site is predominantly bounded by residential development of varying ages, which utilise a mix of two storey and three-storey terraced, detached and semi-detached properties. Predominantly, the houses tend to be in a traditional style, utilising a mix of brickwork and render, with either red or grey clay or concrete roof tiles. To the south east of the site is the open space of Victoria Park.

The Local Plan Proposals Map confirms that the site falls within the urban built confines boundary of Deal. The map confirms that the application site does not fall within any other land designations. The Environment Agency mapping confirms the site does not fall within a flood risk zone.

There are a number of trees on site, particularly along the northern and eastern boundary. These are protected by way of a temporary Tree Preservation Order which came into force on 20th August 2015.

The site is well served in terms of public transport and is highly accessible by foot. There are bus stops located along Mill Road, approximately 150m to the north east and south west, providing access to Deal, Dover and Canterbury. The site is situated within a short walking distance of local shop and amenities, open space (Victoria Park), Castel Community College, Deal Town Football Club, Victoria Hospital and Tides Leisure Centre. The town centre, railway station, pier and beachfront are all conveniently located within walking distance of the site. The immediate surrounding area is predominantly residential in character with a mix of terrace (to the north) and detached (to the south and west) dwellings.

The existing building is part two storey and part single storey with a white rendered two storey façade directly abutting the street and a blank brick single storey elevation forming the remaining frontage boundary to the south. A brick wall continues northwards, broken by the existing vehicular access.

Planning History

Having reviewed Dover District Council's online planning application history records, there were two planning applications relevant to the site regarding external amendments to the building. There are other applications relating to the surrounding area.

Youth Centre

DOV/11/00060 - For the demolition of the two existing timber bay windows to the south and east elevation and replacement with powder coated aluminium section units to the general window fenestration. Status not available.

DOV/94/00822 - Extension to entrance porch. Status not available.

Surrounding Area –

Grove Villa Care, 30A Mill Road, Deal, CT14 9AD.



DOV/12/00791 – Retrospective application for change of use to supported living for adults with learning disabilities. Application was granted with conditions in December 2012.

Planning Policy

Planning applications are to be assessed against policies within the Development Plan and other material considerations. The development plan for the purposes of S38 (6) of the Planning and Compulsory Purchase Act (2004) comprises the Dover District Council Core Strategy (2010) and Land Allocations Local Plan (2015).

Dover District Council Core Strategy (2010)

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

Policy CP2 (Provision for jobs and Home between 2006- 2026) – sets out that land will be identified for the provision of an additional 14,000 homes during the period.

Policy CP3 (Distribution of Housing Allocations) states that to meet the housing provision of CP3 land will be allocated for 1,600 homes in Deal.

Policy CP5 (Sustainable Construction Standards) states that new residential development should achieve at least Code for Sustainable Homes Level 4. *[Note that the Code for Sustainable Homes no longer applies].*

Policy DM13 (Parking Provision) states that parking provision for residential development should be informed by the guidance in the Table for Residential Parking. The table sets out a maximum requirement of 1 space per 3-bed dwelling in edge of centre locations and 1.5 spaces per 3-bed dwelling in suburban location. Both typologies have maximum visitor allocation of 0.2 spaces per unit.

District Objective 4 – sets out there is a localised need for employment, housing and community facilities at Deal.

Paragraph 3.66 – There is a particular need for improved community facilities in the North and Middle Deal areas which are also areas associated with higher levels of social disadvantage. Provision is needed in North Deal for health and social care, children's nursery, business, leisure and meeting facilities, while in Middle Deal the need is more for general leisure and social facilities and improved bus service. Education facilities, particularly primary schools, have seen falling rolls which has led to closure and amalgamation.



Land Allocations Local Plan (LALP) (2015)

The Land Allocations Plan identifies and allocates specific sites that are suitable for development in order to meet the Core Strategy's requirements.

The Core Strategy housing allocation for Deal is 1,600 dwellings. Six sites have been identified for residential development and these will provide approximately 800 dwellings. The allocated sites, together with sites identified through completed and unimplemented planning permissions, leave a residual of approximately 100 dwellings to be identified to meet the Core Strategy requirement.

Whilst the site is not included as a proposed allocation within this document, this is due to the fact that the site was not promoted as a potential allocation and therefore not considered by the Council. The site would be able to contribute as a windfall opportunity for the residual 100 dwellings, now that it is available.

National Planning Policy Framework 2012 (NPPF)

The National Planning Policy Framework provides strategic guidance in the determination of planning applications.

Section 6 – relates to the delivery of a wide choice of high quality homes

Section 7 – requires for new development to be well designed

Section 8 – promotes healthy communities

Sustainable development is central to the NPPF. *Paragraphs 14 & 15* sets out the “presumption in favour of sustainable development” whereby proposals for development which are sustainable should be approved without delay. It notes that where development plans are absent, silent or relevant policies are out of date, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits or where specific policies in the NPPF indicate development should be restricted.

Paragraph 47 requires that local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing. It ensures local planning authorities identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements, with an additional buffer of 5% to ensure choice and competition in the market for land.

Paragraph 70 states to deliver social, recreational and cultural facilities and services the community needs, planning policies and decisions should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs.



The Proposal

It is proposed to demolish the existing building on site and erect 8 no. 3-bedroom dwellings. These will front onto Mill Road with a slight setback to provide landscaping to the front, with private gardens to each dwelling laid out to the rear. A central communal parking area will be served from the existing access as is currently the case, providing spaces for up to 12 spaces, equivalent to 1.5 spaces per dwelling or 1 per dwelling with 4 visitor spaces.

The proposed layout has been informed by a site topographical survey and tree survey which has set the root protection areas of the existing trees. Illustrative schematic site sections show how the development can work with the existing levels to create the parking area whilst retaining the existing trees to the rear. A minor cut and fill exercise across the site can create a more level development platform.

One tree is proposed for removal, being the lime directly adjacent to the existing accessway in the centre of the site. This tree currently has a large defect. No trees on site have been categorised as Category A trees, although a Tree Preservation Order is currently in place.

Planning Merits

Principle

The adopted Local Plan Proposals Map confirms that the site falls within the urban built confines of Deal. The Adopted Core Strategy identifies Deal as a District Centre, the 'Secondary focus for development in the District; suitable for urban scale development'.

The site is well related to the town centre and a variety of local services. It is therefore sustainably located. It also comprises previously developed land which can be utilised more efficiently. In these respects it represents a highly sustainable form of development as promoted by policy.

The existing use on site comprises a community service and the site lies within an area that the Core Strategy identifies as being in need of improved community facilities. In recent times, Linwood Youth Centre has been used as a youth club with use by other community groups at weekends. There has also been an under-5's nursery operating from the site. A new purpose-built property has been constructed on nearby land next to Tides Leisure Centre, close to the site. This will accommodate the youth centre and other services which come under the Early Preventative services umbrella as well as the PRU service, who will return to this area. Other community groups will also be accommodated.

This new building offers far superior accommodation to the Linwood facility more suited to its intended use and with sufficient dedicated car parking. The existing property is outdated, offering impractical space for its users and is in need of extensive refurbishment to meet modern requirements. It fails to provide the type of accommodation these services and groups need.



Linwood Under-5's nursery intends to relocate to another property in the vicinity which will provide better self-contained facilities with outside space in compliance with OFSTED requirements. It will also provide scope for increasing the Early Years offer.

Given the above, the services currently provided from the site will be reprovided in superior accommodation, close to the site with no detriment to the local population. To the contrary, local residents will benefit. The facility is therefore no longer required by KCC for community services or any other service provision and capital receipt from the development will go directly to KCC to assist with service provision more generally. In this regard therefore, the needs identified in the Core Strategy are met, notwithstanding this proposed development.

The site lies in a predominantly residential area and the proposed residential use will accord with this character and will not give rise to any undue impacts on the amenity of existing or prospective residents.

Layout & Design

The proposed layout continues the existing frontage onto Mill Road, although provides a more attractive and active frontage. This also continues the prevailing character of the area which includes terrace housing to the north. Although elevational design will follow, it is envisaged that the dwellings will be 2.5 storeys in height, comparable in scale to the prevailing built form in the area.

The proposed parking area utilises the existing site access and follows the broad layout of the site in its existing form which currently has a central hardstanding parking and turning area.

Trees & Ecology

The proposed design has been directly informed by the tree survey carried out, mindful of the recent TPO. The proposed design with a frontage layout allows for the retention of the existing mature trees to the rear. Where there is encroachment into root protection areas, this remains within the extent of the existing footprint of built form.

The site in its current form is dominated by hardstanding and buildings and of low ecological value, other than the mature trees on the edges of the site which these proposals will retain. No bats have been found to use the existing buildings and no further ecological surveys are required moving forward.

Highways & Parking

The proposed development will utilise the existing access and replace an existing and established use which itself generates movements and parking demand. The proposed layout will provide parking in accordance with the Core Strategy guidance for suburban areas and can equally fit the requirements for edge of centre if during pre-application discussions that typology is considered more relevant here. It will also safeguard existing on street parking arrangements and provision.



Summary & Conclusion

The proposed development makes best use of a previously developed and sustainably located site which is no longer required for its current use. The existing community services provide are to be reprovided nearby in superior accommodation that better meets needs. The scheme will retain the mature and protected boundary trees, with only one tree proposed for removal which is currently subject to a large defect and will follow the pattern and character of development found in the local area whilst providing suitable parking arrangements..

I look forward to receiving any feedback from the Council and would be happy to consider any suggestions or design comments you may have before looking to take the proposals further towards a planning application. I'd be grateful if you could contact me upon receipt of this letter with suggested dates for a pre-application meeting on site.

I look forward to hearing from you shortly and would be happy to discuss any queries or provide any additional information as required.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Matthew Blythin', with a stylized, cursive script.

Matthew Blythin
Associate Director

Enc

Cc. Rod Lemerle – KCC Property Group