



P L A N N I N G  
C O N S U L T A N C Y

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## PLANNING STATEMENT

Change of use and conversion of existing buildings (former funeral directors yard and reception office (Use Class A1), and in-part retail premises (Use Class A1), to 8 self-contained residential units (Use Class C3).



5 York Street, Broadstairs, CT10 1PD

Prepared by Hume Planning Consultancy Ltd.

On Behalf of Financial Advice & Services Limited.

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# 1 INTRODUCTION

- 1.1 This Statement has been prepared in support of a detailed planning application for the following development proposal:

*Change of use and conversion of existing buildings (former funeral directors yard and reception office and in-part retail premises to 8 self-contained residential units (Use Class C3).*

- 1.2 The proposed development site is located within Broadstairs with road frontages to both York Street and Buckingham Road (see figure 1). The site comprises an extensive network of buildings and enclosed outside spaces that were formerly occupied as Blackburn's Furniture retail store (ground floor, with retail frontage of 5 York Street, see figure 2), with residential apartment(s) above over two floors, accessed from the rear; and Blackburn's Funeral Directors (5-6 Buckingham Road) which also includes a separate double garage on the opposite side of the highway (rear of Morellis). Both businesses have since closed, and the buildings are all vacant and in varying states of repair.

- 1.3 It is asserted that the site presents a significant opportunity to sustainably boost the local supply of housing by investment to bring an empty building in the heart of Broadstairs back in to use in a highly sustainable site within the designated urban confines of Broadstairs.

- 1.4 The scheme proposal has been informed by a full review of the site, and has identified what are considered to represent the key central planning issues which include:

- The objective of bringing a vacant building back into active use and to recognise the level of investment required and positive contribution this

will make towards housing supply within the District,

- Recognition, in terms of design, scale, siting and function, of the juxtaposition of the site relative to existing two/three-storey residential and retail development; within the heart of Broadstairs.

- The need to provide a technically and functionally, safe and workable access to the development.

- The need to consider the appropriate level of parking given the location of the building in the heart of Broadstairs and the footprint coverage of the building itself.

- The provision of bike storage to encourage sustainable travel

- The provision of a high quality standard of residential amenities for future residents of the site and the safeguarding of the living conditions of neighbouring occupants

- 1.5 The above factors are considered within the main body of the report; where it is concluded that the development is acceptable in these terms.

- 1.6 Overall, and taking all material factors into account, it is submitted that the presumption in favour of sustainable development expressed throughout the NPPF should be applied to this proposal. Allied to the recognised social, environmental and economic benefits of the scheme; and in the absence of significant and demonstrable adverse harm to other NPPF and Development Plan objectives, it is submitted that the proposed scheme is acceptable in planning terms.

- 1.7 The application is supported by:

- Existing and proposed plans; and
- Design and Access Statement.



Figure 1: Site location plan



Figure 2: 5 York Street (Blackburns, white shop frontage)

## 2 SITE DESCRIPTION & CONTEXT

- 2.1 The application site has an area of c. 0.1ha [outlined in red by figure 1] and is located within the defined urban confines of Broadstairs. The site has a street frontage onto York Street and a longer frontage with double gates (with building over-sail, see figure 3&4) from Buckingham Road leading to an open air courtyard, which contains a number of single storey outbuildings and stores/garages.
- 2.2 Surrounding development to the west of the site (backing on to the pitched roof retail extension within the internal courtyard of the site) are buildings that are c.2 storeys higher than development within the site. There are a number of properties surrounding the site that therefore look across from their higher rear elevations, (see figure 5).
- 2.3 Buildings within the site, fronting Buckingham Road comprise two-storey (pitched roof terrace) and in part three-storey (gable end unit) constructed of yellow stock, with red brick quoin detailing. The large timber doors and fenestration along Buckingham Road give the site an old commercial yard appearance, which make a positive contribution to the streetscene. Development fronts directly onto the back edge of the narrow pavement that runs along this side of Buckingham Road (see figure 4).



Figure 4: Buckingham Road frontage

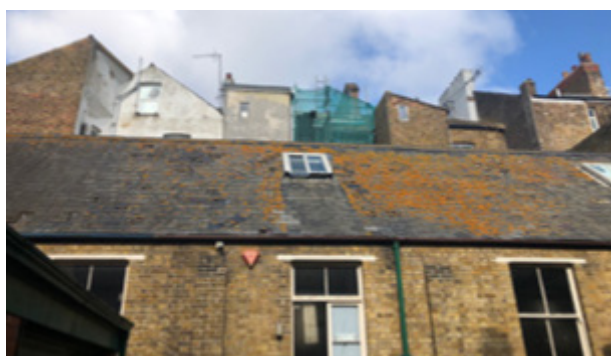


Figure 5: Internal courtyard (looking to the west), rear of properties of 1-4 Chandos Road visible above.



Figure 3: Internal courtyard (looking east), entrance from double gates in Buckingham Road.

- 2.4 The York Street frontage is adjoined to the east by a former Post Office (now retail shop, 3 York Street) beyond which is a hardware store (1 York Street, which is identified as a secondary shopping frontage within the emerging Local Plan, see figure 6); and to the west by retail premises (7 & 9 York Street) both of which are vacant. Floors above the adjoining retail units appear to have a residential use. Those above 9 York Street are rented out as 2no. self-contained holiday lets (Driftwood Apartments).
- 2.5 The site, and surrounding area, is located within the Broadstairs Conservation Area. There are no listed buildings within or immediately adjoining the development site (the closest being Vanity Fair, beyond the site to the west).

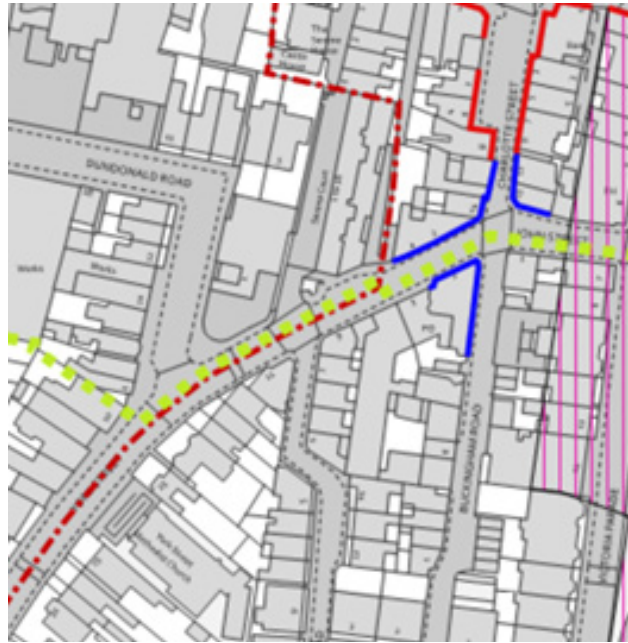


Figure 6: Extract from the emerging Local Plan

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## 3 RELEVANT PLANNING HISTORY

- 3.1 A review of the planning history has identified that there are no relevant applications relating to the development site. However, the following applications, affecting adjoining properties, have been reviewed as part of this submission to determine the impact of the proposal in these directions.
- 3.2 F/TH/16/0031: Change of use of 1st, 2nd and 3rd floors to 3 x self-contained apartments for 1 Chandos Road. This application provides 'proposed floor plans' showing kitchen and utility windows to the rear. **Granted**
- 3.3 F/TH/97/0387: Change of use to bedsits at basement and ground floor levels and self-contained maisonette at 1st, 2nd and 3rd floors – no plans available on-line. **Granted**
- 3.4 Although no planning record of the approved internal layout is available, it was apparent from the site visit that the upper floors have been converted to two, self-contained holiday apartments 'Driftwood Apartments'. Internal photographs are available on their website.
- 3.5 Pre-application advice was received from the LPA in June 2015 (ref: PRE/15/0060) (appendix). The case officer concluded that the principle of the development was acceptable and that the renovation and re-use of the building would be supported in facilitating the optimum viable use of the premises.

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## 4 PROPOSAL

- 4.1 Planning permission is being sought for the change of use and conversion of existing buildings (former funeral directors yard and reception office and in-part retail premises) to 8 self-contained residential units (Use Class C3).
- 4.2 Unit 1 will occupy no.5 York Street, access will be from the rear of the building via Buckingham Road (which is the existing entrance) the retail unit will remain at ground floor level and the residential accommodation will continue to utilise the first and second floors. At first floor level there will be three double bedrooms all with en-suite bathroom and at second floor there will be an open planned kitchen/dining room and a separate lounge. The lounge will benefit from access onto the existing roof terrace. The terrace area will be decked and privacy screens will be erected.
- 4.3 Unit 2 abuts the rear of 5 York Street and will also have access from Buckingham Road, the ground floor will provide an open planned kitchen/dining and living room and the first floor would have two double bedrooms with en-suite bathroom.
- 4.4 Unit 3 is a 1 bedroom flat situated at first floor level above unit 4 which is also a 1 bedroom flat, both units will have access from Buckingham Road.
- 4.5 Units 5 and 6 are situated abutting the back edge of Buckingham Road, either side of the existing vehicle access into the court yard and above at first floor utilising the over-sail. Unit 5 would have 3 double bedrooms and one with en-suite. Unit 6 would be provided with 2 double bedrooms.
- 4.6 Units 7 and 8 are situated at the rear of the court yard, they would both be provided with a spacious open planned kitchen/dining area at basement level. At ground floor level each unit would have a large lounge, W/c and unit 8 would also have a master bedroom. At first floor level unit 7 would have two double bedrooms both with en-suite and unit 8 would have three double bedrooms. Small dormer windows would be added to the east roof slope.
- 4.7 To facilitate the development some existing garages (within the court yard) will be demolished, the court yard will be landscaped and 6 off-street car parking spaces provided (see figure 7).
- 4.8 The fenestration will be replaced with domestic windows and doors but the character of the building will be protected by retaining the same openings.



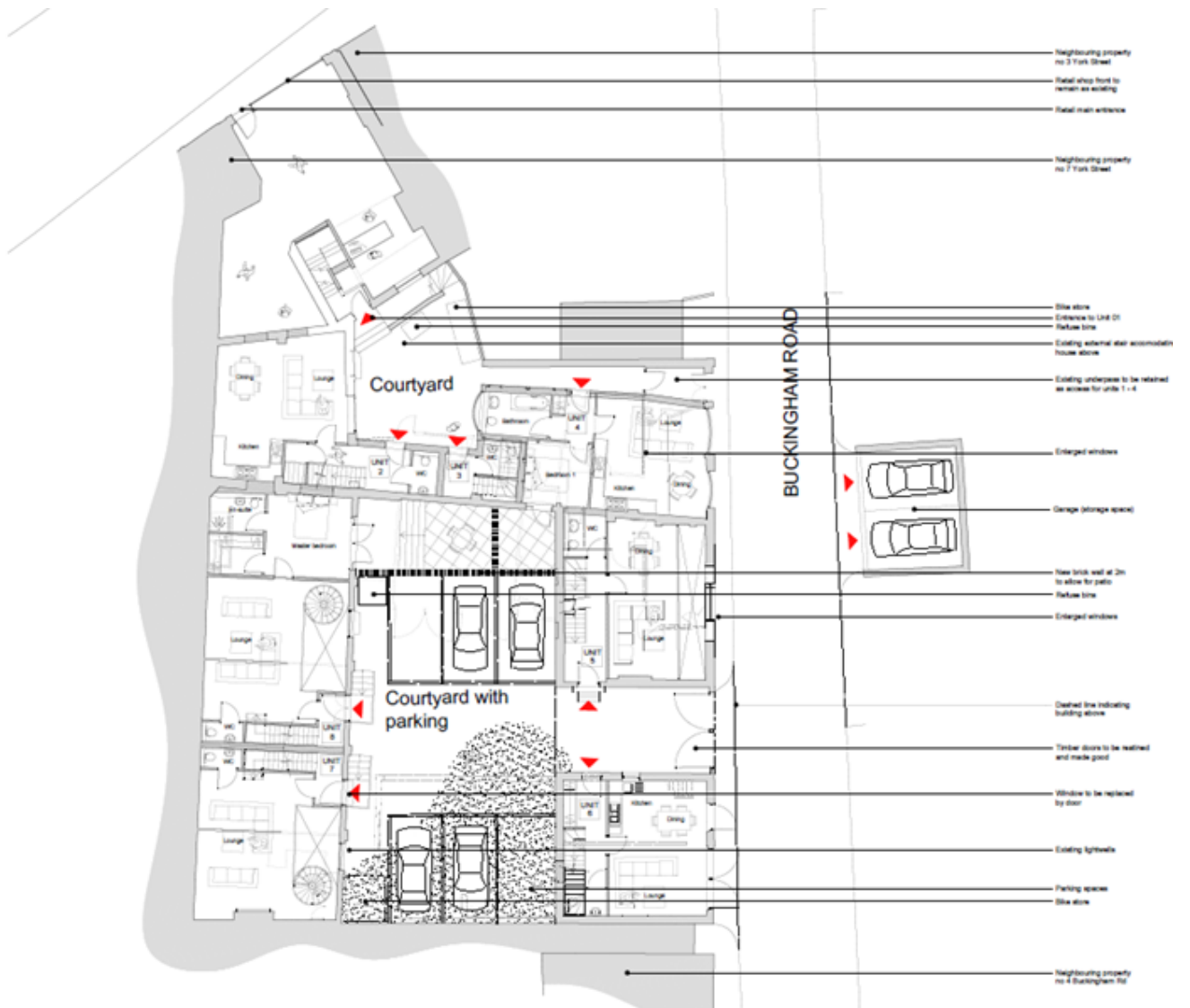


Figure 7: Proposed ground floor layout plan (drawing no.10)

## 5 PLANNING POLICY CONSIDERATIONS

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that the determination of applications must be made in accordance with the development plan unless material considerations indicate otherwise. The Development Plan consists of the Thanet District Local Plan 2006 (saved policies) and the Minerals and Waste Local Plan 2013-30 (KMWLP).
- 5.2 As part of the transitional arrangements from the old Local Plan to the new Local Development Framework (LDF), the Thanet Local Plan expired on 17th June 2009, and only those policies that have been “saved” continue to be part of the Development Plan.
- 5.3 The emerging Thanet Local Plan to 2031 is also at an advanced stage with it being submitted to the Planning Inspectorate for Examination on 30th October 2018. Main Modifications are currently being consulted upon. Because of the number of objections to the emerging local plan, limited weight can be attached to it at this stage although there are more generic policies in the emerging plan which are consistent with the NPPF (such as the focus on bringing empty properties back into use within the urban area) and the emerging document also updates the increased annualised housing requirement relative to the adopted 2006 housing requirement (see below).
- 5.4 Therefore, the main ‘Saved’ Local Plan policies relevant to this proposal are primarily focused on.
- 5.5 In addition to the policies of the development plan, there is other guidance which is material to the determination of planning applications including the National Planning Policy Framework (NPPF) 2019.
- (2006) was predicated on an annualised housing requirement of 375 dwellings per annum. The Objectively Assessed Need (OAN) requirement, which underpins the emerging Local Plan, is based on a significant uplift in housing need, with an annualised requirement of 857 dwellings (a 43.7% increase for each year of the plan period). It is common ground with the LPA that the District currently has a shortfall in the supply of housing land over the relevant period to meet the evidenced target.
- 5.7 This substantial increase in housing need, places the District under significant additional pressure to meet its housing needs target and previously developed sites and/or sites within established urban confines, represent sequentially preferable options for the delivery of sustainable development by reducing the pressure to release greenfield sites, or other less sustainable sites beyond the existing settlement confines.
- 5.8 In June 2006 the Thanet Local Plan (‘TLP’) identified its housing objective to:
- Identify sufficient land supply for housing;
  - Locate new housing development on sites with access to public transport, walking and cycling;
  - To promote efficient use of land applying brownfield sites and higher densities yet providing quality living environments;
  - To widen provision to meet the needs of the community including key worker and smaller households; and
  - To safeguard and enhance the character and amenity of the district.
- 5.9 Policy H1 states that in addition to allocated housing sites, residential development will be permitted on

### THANET LOCAL PLAN 2006 SAVED POLICIES

- 5.6 It is relevant to note that the adopted Local Plan

previously developed land within built up confines. This application submission consists of a brownfield site satisfying the requirements of Policy H1 where the principle of residential redevelopment is considered to be acceptable.

5.10 Linked to Policy H1, Policy H2 (Dwelling Supply) seeks to manage the flow of housing delivery and states that 26% of delivery should come from windfall sites such as this submission.

5.11 Policy H4 states that proposals for Windfall sites coming forward will be assessed against Policy H1 and the following criteria:

- Location and accessibility in relation to jobs, shops and services by modes other than car, and potential for improving such accessibility;
- Capacity of existing and potential infrastructure, including transport, utilities and social facilities;
- Ability to build new communities to support new physical and social infrastructure and with sufficient demand to sustain appropriate local services and facilities;
- Physical and environmental constraints on development including contamination and flood risk.

5.12 For these reasons the principle of this residential change of use of this vacant building within the urban area is considered to be acceptable and is consistent with Policies H1 and H4. There are no policies within the plan which seek to retain the current lawful use.

5.13 Policy TR12 requires the suitable provision for parking and storage of bicycles, which the proposal also satisfies.

5.14 Standards for residential parking as set out in Policy TR16 are supplemented by Kent Interim Guidance Note 3. This proposal provides 4 spaces across the development and bike storage. The assessment section within this Planning Statement highlights the fact that the lawful use of the site would generate a greater demand for car parking and therefore this proposal offers a betterment.

5.15 Policy D1 sets out design principles to be provided by all new developments, dictating that new developments should provide inclusive, sustainable design facilitated through use of high-quality materials. It is considered that the aims of this policy are met by this proposal.

5.16 Policy TC7 sets to safeguard and support development that will encourage leisure, culture, heritage and tourism within the town centre.

5.17 Policy H9 was not saved but this echoes the NPPF in encouraging conversion of non-residential buildings to residential units.

## DRAFT THANET LOCAL PLAN TO 2031 EMERGING POLICIES

5.18 The Draft Thanet Local Plan to 2031 [Preferred Options Consultation] (DTLP) was published in January 2015 and subject to public consultation under Regulation 19 of the Local Plan England Regulations 2012. The draft plan was submitted to the Secretary of State in October 2018 and Modifications following Examination hearings are currently undergoing public consultation.

5.19 It has been highlighted that limited weight can be attributed to the emerging policies, however some emerging policies of a more generic design sustainable construction nature are referenced below.

5.20 Draft Policy SP33 requires new development to be of a high quality and inclusive design. As for Policy D1 of the adopted 2006 Thanet Local Plan, the principal policy objective is to bring forward high quality design that is both sustainable and inclusive.

5.21 Draft Policy QD01 highlights the importance of sustainable design in any development proposal, stating that all development proposals must be designed to reduce emissions of greenhouse gases.

5.22 Draft Policy TP03 states the LPA's wish for new development proposals to consider the growing need for safe cycle links and adequate and secure facilities for the parking and storage of cycles.

This proposal will ensure that there is provision for adequate cycle storage.

- 5.23 Draft Policy TP06 states that proposals for development will be expected to make satisfactory provision for the parking of vehicles, referring to Kent Design Review: Interim Guidance Notice 3 during decision making.

## NATIONAL PLANNING POLICY FRAMEWORK 2019

- 5.24 The NPPF defines the purpose of the planning system as contributing to the achievement of sustainable development and divides this principal objective into three overarching and interdependent objectives, that need to be pursued in mutually supportive ways. The three objectives are:

**An Economic Objective:** to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity, and by identifying and co-ordinating the provision of infrastructure.

**A Social Objective:** to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of the present and future generations; and by fostering a well-designed, safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.

**An Environmental Objective:** to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

- 5.25 With reference to the above objectives, the NPPF states that they are not 'criteria against which every decision can or should be judged', and that planning policies and decisions should 'play an active role in

guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities in each area' (paragraph 9). There is a 'presumption in favour of sustainable development' at the heart of the NPPF (paragraph 10).

- 5.26 Paragraph 11 of the NPPF cements this approach by confirming that for decision making purposes this means:

- approving development proposals that accord with an up-to-date development plan without delay (C); or
- where there are no relevant development plan policies, or the policies which are most important for determining the application are 'out-of-date,' granting planning permission unless (D):
- the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development; or
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of this Framework as a whole.

- 5.27 The delivery of sustainable housing developments remains a priority of the NPPF to 'significantly boost the supply of homes' (paragraph 59). Paragraph 68 emphasises the important contribution that small and medium sites, such as the subject site, can make to meeting the housing requirement of an area stating "they are often built out relatively quickly". The NPPF states that in order to promote the development of a good mix of sites local planning authorities should "support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes".

- 5.28 The sustainable location of development is an important consideration in locating and designing developments. Paragraph 103 of the NPPF outlines that "significant development should be focused on locations which are or can be made sustainable,

through limiting the need to travel and offering genuine choice of transport modes". As identified in the site description section above, this site is located within an accessible and sustainable location, with easy access to alternatives to the private car to provide for movement. This has been recognised by the LPA when granting planning permission for residential development in the vicinity of the site.

5.29 Paragraph 109 states that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. This development would generate less traffic than the existing lawful use and it is asserted therefore that the impact on the road network would not be severe and would not generate an unacceptable impact.

5.30 National planning guidance emphasises the need to make effective use of land. LPAs are required, through NPPF paragraph 117, to set out a clear strategy for accommodating objectively assessed needs in a way that makes as much as possible of previously developed or 'brownfield' land. In particular, planning decisions should 'give substantial weight to the value of using suitable brownfield land within settlements for homes' (paragraph 118); further encouragement is given to the promotion and support for the development of underutilised land and buildings especially where land supply is constrained and available sites can be used more effectively (paragraph 118). It is relevant that it is common ground that Thanet District Council does not enjoy a 5-year land supply at the current time.

## 6 PLANNING ASSESSMENT

### PRINCIPLE OF DEVELOPMENT

- 6.1 In accordance with Section 38(6) of the Planning Act, any application must be determined by the LPA in accordance with the development plan (in this case, the saved policies of the Thanet Local Plan), unless material considerations indicate otherwise. Policy H1 of the Local Plan states that residential development on non-allocated sites will be permitted on previously developed land within existing built up confines unless specified by other Local Plan Policies.
- 6.2 As described above, the application site is located within the established urban confines of Broadstairs, one of the three primary towns within Thanet's settlement hierarchy, set within within a predominantly commercial area (ground floor uses), the site is located just outside of the 'Broadstairs Town Centre Core Area' policy designation (Policy TC7) of the adopted Local Plan, the southern boundary of which includes properties on the opposite side of York Street. On this basis it is asserted that the development is fully in accordance with Local Plan policies. Notwithstanding this, the retention of the existing retail shop to the front supports the existing edge of town centre context and broader regeneration objectives of the Council.
- 6.3 The central location of the site within the urban confines and at the heart of Broadstairs with its full range of local shops, amenities and services, including public transport connections, makes the site highly sustainable, for residential purposes, in these terms. However, with reference to the specific location of this site:

**Walking:** The site is linked by a continuous network of pavements leading to key destinations within Broadstairs. The centre of Broadstairs [with church,

convenience shops, pharmacy, doctors surgery, dentist etc] is a 1km direct walk and the main beach, Viking Bay is 0.8km; Bromstone Primary School, Upton Junior School, St. Josephs Primary School, Haddon Dene and St. Mildred's Infant School are all within 2km of the site.

**Cycle:** There are no immediate dedicated cycle paths near the site, but Stone Road forms part of the Viking Coastal Trail Cycle Route, the roads surrounding the site are wide and well light, creating a safe environment for cyclists. The development provides secure cycle storage for residents within the communal grounds. Cycle access to/from the site is considered to be good. (This provision accords with the design requirements of Local Plan Policy D1(C).

**Bus:** Buses are available at stops very close to the site in Stone Road. Stagecoach bus 37 connects the site with Margate (and the train station in Broadstairs and Margate) and Westwood. An additional bus stop at 'Stone Bay Steps' is some 200m from the site to the south which provides a connection to Ramsgate. The 'Thanet Loop' is also available within a walking distance of 0.8km; giving access to frequencies of 10-12 minutes in each direction. Overall, it is considered that the site is reasonably accessible to bus services.

**Rail:** Broadstairs is the nearest railway station which is located c.1.8km from the site, accessible on foot (20 min) or by cycle (6 min) – giving access to London terminals and nearby towns of Margate, Ramsgate, Canterbury, Dover and Ashford; including HS1 services to St Pancras.

- 6.4 The NPPF – a key material consideration – states that there is an overriding 'presumption in favour

of sustainable development’ (para 10) and that for decision making purposes this means ‘approving development proposals that accord with an up to date plan without delay’ (para 11c). In cases where a district cannot demonstrate a 5-year land supply the LPA must show that the proposal has a significant adverse impact if it is minded to refuse the scheme, this approach to decision taking, referred to as the ‘tilted balance’ is applicable in this case.

6.5 The proposal seeks to re-use the existing building stock, and therefore represents a sustainable re-use of previously developed land for the provision of much needed housing stock within the District – and is supported by both local and national planning policy objectives. It is asserted that there are clear benefits of the site, in terms of its locational sustainability and compliance ‘in principle’ with the spatial planning objectives of the Development Plan and NPPF.

## RESIDENTIAL AMENITY

6.6 It is noted that TDC have a long standing adopted SPD on Flat Conversions, which pre-date the National Space Standards for new development. As a general rule, the local standards are less than the national standards. Figure 8 shows the proposed unit sizes, the smallest unit no.3 (1 bed) is 73.1sqm and the largest unit no.8 (4 bed) is 212.2sqm, the Technical standards respectively require 50sqm and 124sqm. In terms of overall unit size the proposed units comply with the national standards (and inherently the local conversion standards).

Residential Unit 1 - total of 148.6 sqm	<span style="color: #4682B4;">■</span>
Residential Unit 2 - total of 88.7 sqm	<span style="color: #D2B48C;">■</span>
Residential Unit 3 - total of 73.1 sqm	<span style="color: #3CB371;">■</span>
Residential Unit 4 - total of 46.7 sqm	<span style="color: #FF8C00;">■</span>
Residential Unit 5 - total of 164.8 sqm	<span style="color: #ADD8E6;">■</span>
Residential Unit 6 - total of 80.8 sqm	<span style="color: #4169E1;">■</span>
Residential Unit 7 - total of 130.9 sqm	<span style="color: #F06292;">■</span>
Residential Unit 8 - total of 212.2 sqm	<span style="color: #4682B4;">■</span>

Figure 8: Proposed accommodation schedule

6.7 Units 5, 7 and 8 will have basement living accommodation, the basements will accommodate a kitchen and dining area. Unit 5 will be served by a traditional light well and the existing window at pavement level will be retained and enlarged. Units 5, 7 and 8 have been designed to have the ground floor set back, allowing for an attractive spiral staircase down to the basement and for natural light to flood in from the ground floor to the basement, this is practical as well as providing an attractive architectural solution. Units 7 and 8 will also benefit from what essentially would be a high-level window, set partially at basement level. Figure 9 below is a cross section of unit 7 and ground floor plan of unit 5, which shows the ground floor set back and basement window – demonstrating that the basement will receive ample natural light and compliance with the FCG.



Figure 9: Cross section of unit 7 and ground floor plan of unit 5 (yellow highlight area shows lightwell)

- 6.8 The pre-application advice in 2015 acknowledged that the physical constraints of the site and the character of surrounding residential development, would result in a lack of play space and would have to be weighed against the benefits of bringing these redundant buildings back into use. The applicant's design team has sought to include some private amenity space within the development, unit 1, unit 4 and the largest unit no.8 will be provided with their own doorstep amenity space in accordance with policy SR5. It is asserted that with the close proximity of Pierremont Park, Victoria Gardens (the green by the bandstand) promenade & beaches which are all within 100-200m of the site which will serve to provide this development with adequate amenity space, figure 10 shows the close proximity of these quality open spaces to the development site.
- 6.9 In addition, significant weight should be given to the provision of additional housing and re-using a vacant building within the Conservation Area. It is asserted that the benefits of this development would outweigh the harm of not every unit having private outdoor amenity space which would not normally be expected by a prospective residential occupier in a town centre location like this. All units will be provided with an external bike and bin store.



Figure 10: Proximity of amenity spaces

- 6.10 As noted above, the site is surrounded by existing taller residential development, particularly to the north and west. Conversion has been sensitively designed so as to ensure that intervisibility between the existing and proposed residential units is minimised.
- 6.11 The primary outlook for units 2, 7 and 8 will be from the east elevation facing into the court yard between the frontage properties and those units abutting Buckingham Road will have their main outlook over the street.
- 6.12 All bathroom windows will be fitted with obscure glass which can be controlled by a planning condition. The roof terrace to unit one will be restricted in size as shown on plan drawing no. 11 and a privacy screen will be erected around it, this can also be controlled by a planning condition. As the terrace is already existing and currently has no restrictions it is asserted that this planning application proposes a betterment and will reduce the level of overlooking towards the adjacent dwellings. The proposal will comply with policy D1.B of the Local Plan.

## CONSERVATION AREA

- 6.13 This development will retain and bring back into use this vacant site. It will prevent general deterioration and investment will be made to improve the fabric of the building which in turn will preserve the character of the Conservation Area. Figure 11 and 12 below demonstrates that the main character of Buckingham Road will be retained, the existing window and door opening will be utilised within the conversion. The existing brickwork will be retained, windows and timbers will be timber and glazing details will match the existing. The proposal will therefore preserve. The development will not affect the setting of Listed Buildings within the wider area.





Figure 11: Proposed elevation fronting Buckingham Road Figure 12: Existing elevation fronting Buckingham Road

6.14 No.5 York Street has a prominent street frontage figure 13 and 14 below demonstrates that no significant changes will be made and that the character and appearance of the conservation area will be preserved.

## HIGHWAYS & PARKING

6.15 The Kent Design Guide, Interim Guidance Note 3 (IGN3) sets out the requirements for residential parking and identifies requirements for various categories of development type/location. The parking standards set out a maximum requirement which in this instance equates to 1 space per flat. Paragraph 5.73 of the Local Plan also confirms that ‘The Council will expect lower or nil provision to be considered where sites are well located in relation to public transport and a range of services. Significant reductions to maximum standards will also be expected in residential development where conversion is involved and where off-street parking may be difficult to design in’.

6.16 Significant reductions to maximum standards will also be expected in residential development where conversion is involved and where off-street parking may be difficult to design in’. The proposal seeks to use existing vacant floorspace at a highly sustainable location within the heart of Broadstairs and as a principle the lack of provision of parking in this instance should not serve to sterilise the potential use of the upper levels of the building, which would be the opposite of what development plan policies and the Framework encourages planning decision makers to do. The application site is strictly beyond the tightly drawn designated town centre confines (wherein parking standards are not applied) but is nevertheless considered to represent a town centre site where it is asserted that a lower provision of car parking as justified by Policy TR16 is appropriate.



Figure 13: Proposed elevation to York Street

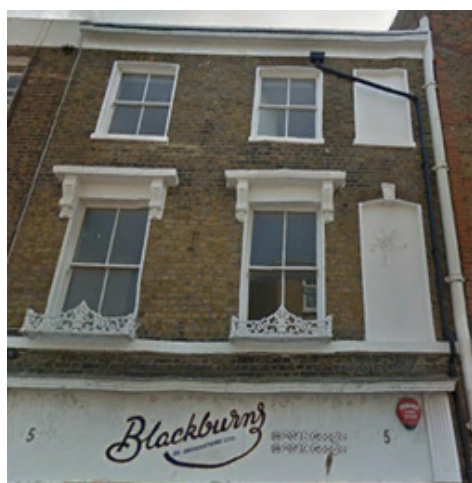


Figure 14: Photo of elevation to York Street

6.17 The applicant has strived to provide some offstreet parking and 6 unallocated spaces together with bike storage in this urban sustainable location is considered to be appropriate given the site circumstances and desirability of bringing the existing floorspace back in to use. It is also relevant that the existing lawful use as a funeral directors and furniture shop (including customers, deliveries and staff) would have generated a greater level of vehicle movements which would have utilised the vehicle access and surrounding roads and the proposal is therefore considered to represent a betterment.

6.18 The vehicle access to the site has restricted visibility when vehicles leave the site into Buckingham Road but this is mitigated by the fact that Buckingham Road is a one way street (from north to south) and with car parking restrictions on both side of the road, see figure 15 opposite. Furthermore as no additional floor space is being created and the existing lawful use of the site as a funeral directors would have generated a greater number of vehicle movements it is considered the provision of the six parking spaces is appropriate in this instance.

6.19 The site also includes a detached double garage on the other side of Buckingham Road, which was connected to the former funeral director's use, as Kent Highway Services do not 'count' garage spaces towards the provision of parking to service a development, these two garages have been allocated to the largest units on the site for use as residential storage.

6.20 Overall, the impact of the development in terms of traffic generation and highway capacity would not be significant, and it is considered, would not have a severe impact on the existing highway network – a determinative test set out within the NPPF (paragraph 109).



Figure 15: Buckingham Road – one way street and parking restrictions

## STRATEGIC ACCESS MANAGEMENT & MONITORING SCHEME

6.21 It is acknowledged that the development may have potential for indirect effects upon the SPA, SAC and SSSI designated areas through increased recreational pressures from the new residents of the proposed development. To mitigate the potential impact in this respect, a contribution towards the Strategic Access Management and Monitoring Scheme (SAMMS) is proposed in accordance with the LPAs SAAMS tariff. The SAMM provides a strategy to mitigate the potential in-combination impacts of new housing development and resulting recreational pressure on the SPA.

## 7 CONCLUSION

- 7.1 It is submitted that the proposed development brings forward a deliverable, 'windfall' site that is well related to the heart of Broadstairs and will contribute to meeting the districts needs through the reuse of a vacant building at a sustainable location. These are factors that are considered to weigh heavily in favour of the proposal because of the absence of a 5-year land supply in the district and in this case, the requirement for the decision maker (TDC) to apply the "tilted balance" in favour of the submission such that the LPA should be sure, if minded to refuse the scheme, that any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 7.2 The proposal will widen the opportunities for home ownership - to meet the recognised need for smaller households in Broadstairs.
- 7.3 With reference to site specific factors, it has been demonstrated through this application that:
- The proposed development is compatible with the design objectives of the Local Plan (Policies D1 & D2)
  - The development will enhance the appearance of the Conservation Area
  - The development provides a satisfactory level of car parking
  - The development provides safe and secure cycle storage for all residents, in accordance with Local Plan Policy TR12;
  - The design respects and safeguards the amenities of the adjacent neighbours and provides a good standard of living accommodation for future residents, in accordance with policies D1 and SR5
- The development will mitigate any recreational harm caused to the SPA, SAC and SSSI.
- 7.4 In seeking to collectively address the three dimensions of 'sustainable development' defined by the NPPF, the proposal would provide an economic benefit through the provision of additional housing which plays an important role in supporting wider economic growth, together with a short-term benefit of construction employment and associated industries. In terms of the social dimension, the development would make a positive contribution towards the supply of housing within an area experiencing an acute shortage. The site benefits from a sustainable location from where local services and facilities are accessible, and; the development is well related to the surrounding built area with minimal changes to the front elevations. The environmental dimension has been addressed through the internal layout and design of the proposal which safeguards the residential amenities of neighbouring residential occupiers (particularly when the previous commercial use is taken into account).
- 7.5 In accordance with the provisions of the NPPF, it is respectfully requested that this proposal for sustainable development is supported which - as a deliverable, previously developed, windfall site within the urban confines and Conservation Area - sits squarely with the objectives of the NPPF, and will make a valuable contribution to housing supply, in the district in the short term, and will bring forward a range of positive sustainable benefits. In line with the development plan and policies D1 and H13.

# APPENDIX 1

PRE-APPLICATION ADVICE (PRE/15/0060)

## PLANNING APPLICATIONS TEAM

Our Ref: PRE/PRE/15/0060  
Date: 10 June 2015



Ms R Wise  
Guy Hollaway  
The Tramway Stables  
Rampart Road  
Hythe  
Kent  
CT21 5BG

Dear Ms Wise

### **TOWN AND COUNTRY PLANNING ACT 1990 PRE APPLICATION ENQUIRY**

**PROPOSAL: Erection of 9No. dwellings and 1No. commercial unit following demolition of existing buildings.**

**LOCATION: 5-7 YORK STREET AND 7-9 BUCKINGHAM ROAD, BROADSTAIRS, KENT**

Thank you for your pre application enquiry which I received on **22/04/2015**. I am writing to you following our meeting on site on the 14th May and my subsequent email on the 20th May. This letter will confirm the contents of the email as the formal pre-application response of the Planning department to the proposal.

#### **Principle**

The site lies within the Broadstairs Conservation Area, and the proposal seeks to retain the existing buildings in situ to create new residential properties and 1no. commercial unit. the principle of the conversion of the existing buildings, utilising the existing openings, to residential is acceptable, subject to the design changes required, the standard of accommodation and highways considerations.

#### **Character and Appearance**

At our meeting and stating in the following email, the existing light wells for units 4-6 will need to be excavated and potentially increased in size to ensure an acceptable level of light to the living area of the units, with the internal roof structure potentially restricting the number of units this building can be converted into. This will be informed by structural work in the next stage, and we also discussed the potential for small pitched roof dormer windows to be inserted in the front roofslope of this part of the building. This would be acceptable subject to the design and the appropriate positioning/window relationship with units 9 & 10.



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The retail use and existing residential above would not significantly alter from the existing arrangement, and therefore no significant issues would be created by these elements.

We discussed the refurbishment of the windows in situ, which were in good condition, whilst also agreed that the minor alterations to the elevation fronting Buckingham Street should be designed with reference to the existing openings on the building and within the Conservation area. The demolition of the single storey structures within the Courtyard is acceptable to increase the availability of parking.

No elevations have been provided with the submission, therefore I cannot assess any changes that may have to occur to facilitate the conversion. However from our discussion I am satisfied that the importance of the character and appearance of the Conservation area, through appropriate design and use of traditional materials, was mutually agreed and would inform any future submission.

### **Living Conditions**

As outlined above and at the meeting, the number of units that can be provided within the rear pitched roof building will be determined by the internal size of the units, the amount of light available through the lightwell excavation to the basement, and how the internal arrangement of roof trusses relates to the internal subdivision of units and rooms at roof level. All other units appear to have adequate outlook, natural light and internal layout to provide a good standard of accommodation.

The development would not provide any doorstep play space, with the proposed roof terrace to no.2 potentially resulting in overlooking. Given the physical restrictions on site and the character of residential development in the area, this lack of play space would be weighed against the benefits of providing for the re-use of the building and the provision of residential accommodation. I would advise that this issue, and Thanet Local Plan Policy SR5, is considered within the design and access statement required with submission of an application, with an assessment of similar units in the vicinity of the site and provision of play space.

### **Highways**

I have informally discussed the parking arrangement and application with KCC Highways, who offer a separate pre-application advice service available: <http://www.kent.gov.uk/waste-planning-and-land/planning-applications/planning-advice/highway-pre-application-advice>. Due to the site's location close to the town centre area and the previous use of the building, and the on-street controls in the vicinity, it is unlikely, on the basis of the information submitted and provision of 6 parking spaces, that the development would result in significant highway amenity harm or an impact on the network. This issue will be subject to formal consultation with KCC during the full planning application process.

### **Other matters**

Upon receipt of a planning application for a new dwelling, Southern Water would be consulted with regards to the capacity of the existing drainage for foul water to serve any

development. They can be contacted on 0330 303 0119 or via [www.southernwater.co.uk](http://www.southernwater.co.uk)

## **Conclusion**

The principle of converting the existing building into residential properties is acceptable in principle, with the refurbishment, renovation and re-use of the building supported in facilitating the optimum viable use of the premises. The submission would be subject to an assessment on the basis of the above issues.

The advice contained in this letter is given without prejudice to the Council's normal decision making process.

Yours faithfully



Iain Livingstone

**Case Officer**

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