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Pre-Application Advice from  
Swale Borough Council  
Dated 27/03/18

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Our Ref: 18/500181/PAMEET  
Your Ref:  
Date: 27<sup>th</sup> March, 2018

Dear Mr Lawless,

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)  
PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990 (AS  
AMENDED)**

**Re: Sittingbourne Adult Education Centre, College Road, Sittingbourne**

I refer to your pre-application enquiry in respect of the above site. Your proposal seeks to convert the existing building into flats. The plans submitted indicate that the building could be converted to provide 15 no flats, ranging from 1 to 3 bed units. We met on site to inspect the building on the 25<sup>th</sup> January. I apologise for the delay in providing my written comments.

The current site consists of a grade II listed building, last in use as an adult education centre and now vacant, but originally designed as a boarding school, as set out in the list description for the building ([see: http://www.imagesofengland.org.uk/details/default.aspx?id=175812](http://www.imagesofengland.org.uk/details/default.aspx?id=175812)).

The building is sited within large grounds which extend to the west. The building is sited within the built confines of Sittingbourne, although the land to the west falls outside of such confines and within an important countryside gap. Some trees on the south east and west boundary of the site are protected by a Tree Preservation Order.

Although you have submitted a series of drawings from 2015 which show new residential development on this land to the west, you confirmed that this was not part of the proposal, and that you were seeking solely to alter / convert the listed building into flats.

The adopted Swale Borough Local Plan – Bearing Fruits 2031 sets out a range of policies for developments within the borough. I consider the following policies to be of most relevance:

- ST5 The Sittingbourne Area Strategy
- CP6 Community facilities and services to meet local needs
- DM7 Vehicle parking
- DM8 Affordable Housing
- DM14 General development criteria
- DM29 Woodlands, trees and hedges
- DM32 Development involving listed buildings

The longstanding use of the site as an education centre would be classed as a community facility under policy CP6 of the adopted plan. This policy seeks to retain such facilities, unless

replacement facilities are provided without leading to a shortfall in provision. The use of the site for adult education has now ceased, and I understand that this facility has relocated to London Road, Sittingbourne. On this basis, it would appear to me that the proposal would not conflict with this policy.

The proposal would create a new longstanding and sustainable use for this listed building. Residential use would be in keeping with the prevailing residential character of the area. There are substantial grounds around the building (excluding the land to the west) and this would be likely to provide sufficient access, parking, storage and amenity space for residents. From an internal inspection of the building, it is likely that subdivision into flats would be possible without material harm to the historic fabric and overall character of the building. The reasonably detailed list description for this building provide us with a good understanding of where the main heritage significance of this building lies, and it is clear that this is principally in the architectural detailing to the external elevations. However, specific reference is made to a number of important internal features (including the ornamental fireplaces in the large central hall) and it will therefore be important to retain, and where possible, make specific use of these features as key character elements of the building.

Whilst the internal plan form of the building is not specifically mentioned, local and national planning policy and associated guidance would suggest that the original plan form of the building should be retained as far as possible and any further or replacement subdivision of the original rooms layout should be kept to a minimum. In this particular respect, I would advise that the large central hall space should ideally remain as one large open area, and as such consideration might be given to using it e.g. as a concierge facility and/or private (communal) gym space for the residents of the building. Some consideration might be given to the possible provision of visually lightweight screens and/or partial mezzanine floor area if this would both function well with the character of the space and the proposed new use of the building. Any proposed works to alter the interior of the building (whether in relation to layout or specific features) will need to be shown as part of the necessary application for listed building consent.

Externally, I understand that the range of outbuildings to the north are likely to be removed, which would be of significant benefit to the setting of the listed building. Some external works to doorways and windows would also be required. Whilst the details of such works have not been provided, there are some existing windows and doorways that have been added or modified to the listed building and which detract from it – and the conversion should include works to such openings to restore original character and / or provide a better match to the building. Conversely, as you may recall from our site meeting, there are a number of windows (e.g. the small sash windows set into the gothic arch openings with stone surrounds) where it will be important to retain and repair/refurbish the existing historic fabric.

You should provide a detailed Heritage Statement as part of your application submission, setting out the history, character and evolution of the building, and how this has informed the approach to the development and the degree of alterations proposed. Clearly the setting of the listed building has changed quite significantly since it was erected in 1878, but the landscaped areas to the southwest and northwest of the building go some way to providing some semblance of a reasonable setting for the building, and the setting of this building does in part contribute to its overall level of heritage significance. As such, detailed consideration should be given to how the setting of the listed building could be at least preserved, if not ideally enhanced as part of your proposals to convert it to residential use, and there would

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certainly appear to be plenty of scope for improvements in this respect. For instance, the existing car park to the northeast side of the building should be large enough to provide car parking for both residents and visitors, meaning that much of the area to the southwest side of the building can be given over to soft landscaping, perhaps with some inspiration for the landscaping scheme for the site to be taken from the layout of the site as seen in the 1897 O.S. sheet for the locality, which could usefully be referred to and shown in your Heritage Statement. The blocked off access to College Road off the car park area to the northeast side of the building might feasibly be reopened (subject to Highway Authority approval) thereby extending the scope for further (visually beneficial) landscaping to the southeast side of the building.

As some trees on site are protected by a TPO, it will be important to demonstrate that the development can be undertaken without any harm to these trees. If any works or alterations are to take place in proximity to such trees, you may need to submit an arboricultural report to demonstrate the likely impacts.

The layout of the building is such that proposed conversion to flats would be unlikely to cause any unacceptable amenity impacts on surrounding residential properties.

The proposal would generate a requirement for affordable housing (10% of total provision), and for infrastructure contributions (normally education, libraries, community and adult social services as required by Kent County Council, NHS contributions, wheelie bin provision and off-site open space contributions as required by Swale Borough Council), as set out under policies CP6, DM8 and DM17 of the adopted plan – in order to meet additional demands on local infrastructure as generated from the development. These will be set out in detail by relevant external and internal consultees at application stage. In addition, a contribution towards the Council's SAMMS strategy will be required, as set out under Policy DM28 of the adopted plan. See paragraphs 7.7.57 and 7.7.58 of the supporting text to the policy for further information. The contribution for the SAMMS strategy payment is current set at £281 per dwelling.

Taking the above into account, I consider the principle of conversion to residential use to be acceptable. The alterations required to facilitate this will need to be sensitively designed to maintain the heritage significance of the listed building, and this will need to be shown in detail as part of the application process. Applications for both planning permission and listed building consent will be required. A legal agreement will also be required to secure affordable housing and any necessary financial contributions. Finally, the application for listed building consent should be supported by a detailed and up-to-date building condition survey carried out by a conservation accredited building surveyor and a resulting detailed schedule of repairs/remedial works that will need to be carried out in conjunction with the proposed conversion works.

I trust this is of use to you. However you will appreciate that this is an officer opinion, and is not binding on the Council.

Please contact me if you wish to discuss further.

Yours sincerely,

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C.C: Simon Algar – SBC Design & Conservation Manager