



Mr Siddique
C/O Ken Judge & Associates Ltd
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CM9 6SN

09 August 2023

Dear Sir or Madam

PRE-APPLICATION ADVICE: RESPONSE

Reference: 23/502228/PAMEET

Proposal: Proposed change of use of the existing second floor from Office Use (Class E) to residential use (Class C3) including the construction of an additional third floor to create self-contained residential flat units. Proposed three storey rear extension to create self-contained residential units to the first and second floors with separate Ground Floor entrance.

Location: 1-5 Central Avenue, Sittingbourne, Kent, ME10 4BX.

I refer to your request for pre-application advice regarding the above location and proposal. I apologise for my late response.

Your proposals have been considered and I have the following advice:

I CONTEXT

Site description

The pre-application site is a three-storey flat roofed 1960's build commercial building and is positioned on the corner of High Street and Central Avenue and is in the heart of Sittingbourne town centre.

You have stated in your letter that the existing ground floor and basement are currently occupied by Natwest Bank, first floor offices are part in use by Natwest and part used by other separate companies. The second floor is in office use by a single commercial occupier.

The composition of the site is a building and ground level car parking with barrier control to the rear of the site on Central Avenue.

MKPS – Working in Partnership with: Swale Borough Council

Please Note: All planning related correspondence for SBC should be sent to:

Mid Kent Planning Support, Maidstone House, King Street, Maidstone ME15 6JQ

Email: planningsupport@midkent.gov.uk

Access planning services online at: www.swale.gov.uk or submit an application via www.planningportal.co.uk

The site is within the Sittingbourne built-up area and is within designated town centre boundary and the Sittingbourne regeneration area, which is surrounded by a mixture of uses, including commercial ground floor uses and residential occupiers to upper floors.

The site is not listed but within the Sittingbourne Conservation Area and there are listed buildings adjacent to the site; most notably to the east of the site is the Barclays Bank (now closed), Grade II listed building.

The existing building has part stone/ part facing brickwork external finish at ground floor level with concrete panelled finish at first and second floor levels. The upper levels are accessed by an entrance at ground floor level to the side elevation which has glazed panels to the staircase enclosure at the first and second floor levels.

To the rear of the site is a public car park with 180 car parking spaces, with a further 270 spaces adjoining the Forum Centre.

The site is centrally located within the town centre and therefore has good public transport (railway and bus links) facilities.

Planning constraints

Sittingbourne High Street Conservation Area
Primary shopping area
Within town centre boundary
Adjacent to listed buildings.
Allocated site – housing/economic development.

Planning Policy Context

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning decisions to be made in accordance with the development plan unless material considerations indicate otherwise.

The development plan in Swale is Bearing Fruits 2031, The Swale Borough Local Plan (2017), referred to in this advice note as the Local Plan.

The National Planning Policy Framework (2021) sets out the Government's planning policies for England including the presumption in favour of sustainable development and is a material consideration in the determination of all applications.

Swale's planning policy and guidance documents can be viewed at: [Local Plans - Adopted Local Plan for Swale](#)

The most relevant policies and guidance relating to your proposal are provided in Appendix 1 of this advice note.

Relevant planning history

19/505932/FULL

Change of use of first floor from recruitment agency, class A2 to training unit, class D1.

Approved

Decision Date: 13/03/2020

The proposal

The proposal relates to the change of change of use of the existing second floor from Office Use (Class E) to residential use (Class C3) including the construction of an additional third floor to create self-contained residential flat units. Proposed three storey rear extension to create self-contained residential units to the first and second floors with separate Ground Floor entrance.

Proposed second floor residential units:

- 1 x one-bedroom,
- 3 x two-bedroom and
- 2 x three-bedroom flat units

Proposed third floor residential units:

- 2 x two-bedroom and
- 2 x three-bedroom flat unit

Proposed three-storey rear extension will consist of units to the first and second floor levels with an independent ground floor entrance

- 4 x two-bedrooms

Total of 14 new residential units are proposed.

The new third floor would be accessed by a new staircase from the existing staircase enclosure below to lower floor levels.

The proposed external appearance of the extension would match the existing premises i.e. concrete panelled external walls, facing brickwork at ground floor level.

Part of the existing car parking area would remain and would include a provision of cycle (with secure enclosure) storage and a separate entrance with staircase to the new upper floors. The car park would retain 7 car parking spaces for use of the existing ground/first floor commercial use.

Procedural matters

In our previous meeting held via Teams on the 20 July 2023, you indicated that your client would like to submit a full planning application for the change of use. Given the nature of the site i.e., based within Sittingbourne Town Centre, I think a full application is the best approach so all matters with respect to appearance, landscaping, layout, scale, and access can be dealt with in one application.

Whilst you have submitted indicative proposed plans and elevations more detail will need to accompany the full application for an assessment of the impact of the proposal to be made (e.g., the visual impact to the surrounding townscape and to the setting of listed buildings and the impact on the amenity of neighbours). You are advised that a plan should also be included with the application showing maximum heights at different positions on the site to be identified. This is needed so an understanding of the impact to the townscape and neighbouring occupiers can be made.

The site is on a prominent corner of Sittingbourne High Street / Central Avenue and therefore the position of the building is important to understanding if the proposal would have unacceptable highways impacts and cause any unacceptable harm to living conditions for neighbouring and future occupiers alike.

More detailed analysis showing the location of the building in relation to any impact of the neighbouring listed buildings and other adjacent buildings would need to be provided at the application stage. Zones for public realm and external amenity space should be identifiable. Any application must enable identification of impacts in relation to trees, sources of noise, and neighbour impacts.

To avoid delay at application stage, you advised that sufficient information (in the form of parameter plans) in relation to the proposed heights and location of built form should be provided to inform an assessment of the visual impact to the surrounding townscape, the setting of listed buildings, to trees and to neighbouring amenity and noise sources. Without this information the Council would request further details.

II ASSESSMENT

LAND USE PRINCIPLES

Introduction of residential accommodation

The site is previously developed or brownfield land, and the National Planning Policy Framework (NPPF) at paragraph 120 states that substantial weight should be given in planning decision to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land. The proposals would align with the NPPF in this regard.

Policy ST1 of the Local Plan supports sustainable development on both identified and suitable sites within the borough. While not an allocated site it is considered suitable for development.

Policy ST3 states that the urban centre of Sittingbourne will provide the primary urban focus for growth, where development will support town centre regeneration and underpin the town's role as the principal centre.

Policy ST5 supports the creation of housing and other mixed uses within the Sittingbourne town centre regeneration or at other sites within the urban and village confines. The proposed development site is within the urban confines of Sittingbourne, which is designated for growth, and the site has been previously developed.

The site is within the built-up area of Sittingbourne and is in a sustainable location owing to its location on the corner of Sittingbourne High Street. Access to essential services and utilities can be easily reached from this location and the site lies adjacent to existing commercial and residential uses.

The principle of change of use of this site in this location for residential use is acceptable as per the guidance also provided by the Planning Policy Team.

LAYOUT, SCALE AND DESIGN OF THE DEVELOPMENT

Building Layout and Spatial Configuration

You have submitted an indicative layout plan has been shown (as one way the development could come forward). It is important that the amenity of the neighbouring property at ? is given careful consideration, and the layout is dealt with in a way that minimises the impact upon existing neighbours.

Policy CP4 of the Local Plan requires all developments to achieve high quality design, appropriate to its surroundings, that creates attractive places, promotes, and reinforces local distinctiveness and strengthens a sense of place.

The Council's Design and Extension - a guide for Householders Supplementary Planning Guidance (SPG) suggests that at least 21m separation distance should be maintained between habitable room windows in different dwellings. This is to prevent a significant loss of amenity relating to daylight/sunlight, visual intrusion to outlook and privacy.

Most of the proposed flats would face High Street and Central Avenue in which there would be very limited impact on any neighbouring residential units.

Height

Scale is defined as:

'Scale' – the height, width and length of each building proposed within the development in relation to its surroundings.

Sufficient detail will need to accompany the application for an assessment of the impact of the proposal to be made (e.g., to the visual impact to the surrounding area).

The indicative heights show a building and additional storey to be added on the building which would be set-back from the High Street front building line as well as the side building line facing Central Avenue.

The proposed approach to scale and height may not be considered so problematic, however the Council's Urban Design Officer has some concerns regarding the minimal set-back on the 4th storey facing Central Avenue, please refer to the Urban Design Section of this letter.

The Sittingbourne Master Plan of 2010 does not encompass the pre-application site. Policy Regen 1 of the Local Plan does not apply to the site. The Cockleshell Walk car park and the Spring Street car park are within the regeneration area and benefit from planning permission for housing.

A key rationale for allowing housing on the Cockleshell Walk car park is to improve the western district, which is a key gateway to Sittingbourne, and makes better use of the surface level car park and improves the townscape by screening the rear of dwellings fronting Frederick Street. Development on the application site does assist with this objective. In addition, the housing approved on the Cockleshell Walk car park site is limited to 4 storeys, the pre-application site has proposed 4 storey's and is considered appropriate.

The Council adopted the Sittingbourne Town Centre Supplementary Planning Document (SPD) in September 2022, and this does encompass the pre-application site.

As proposed, the development would comfortably assimilate into the immediate townscape and the scale is not likely to result in unacceptable amenity impacts to existing residential occupiers in the immediate locality, and therefore the height is considered acceptable, subject to the final design and taken account of the sensitivities in a Conservation Area.

Sensitive transitions must be designed between existing and new development so that building heights, typologies and tenures sit comfortably next to each other.

It is critical that any planning application is accompanied by a plan setting out maximum heights across the site. Cross sections should be provided along with heights set out in metres above ground level and AOD.

Appearance

Government advice at paragraph 130 (a) – (d) of the NPPF attach great importance to the design of built development. It goes on to advise that planning decisions should ensure that development will function well and add to the quality of the overall area; not just for the short term but over the life time of a development; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to local character and history, including the built environment and landscape setting, while not discouraging appropriate innovation and change (such as increased densities); establish or maintain a strong sense of place, using the arrangements of streets, space, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.

The National Design Guide illustrates how well-designed places that are beautiful, enduring, and successful can be achieved in practice. It forms part of the Government's collection of planning practice guidance.

The pre-application submission includes a limited analysis of the surrounding area; however further work is needed in this regard. A local study should accompany any application to develop an understanding of local character, local urban development, and contextual development.

The proposed housing development should aim to be a seamless natural extension to the existing housing development. At present the proposal does not successfully achieve this.

Local Plan Policy DM36 relates to areas of high townscape value. The Policy states that within and adjacent to the Area of High Townscape Value, the Borough Council will not grant planning permission for development proposals unless it provides for the conservation or enhancement of the local historic and architectural character, together with its greenspaces, landscaping, and trees.

Please refer to Heritage Section on further advice about external materials.

Impact of Noise from the Proposals

The Mid Kent Environmental Protection Officer does have some concerns with the change of use that the proposed development site is situated in a High Street with various existing

noise sources , and therefore a noise survey would be required as part of the application submission. The site is opposite a nightclub (78a High Street) that has a licence until 3am. Loud amplified music and the behavioural noise of patrons as they leave the nightclub is likely to have an impact on the amenity of the proposed residential dwellings and the Council are currently in receipt of complaints from neighbours in the residential flats that were converted from the neighbouring Barclays bank (number 79 High Street).

HERITAGE

s66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended, states that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Local Plan Policy CP8 sets out various requirements proposals must accord with to sustain and enhance the significance of Swale's designated heritage assets. Policy DM32 relates to listed buildings and is clear that proposals must preserve the buildings setting and any features of special architectural or historic interest.

The Council's Conservation officer advised the following:

- The enquiry property lies within the Sittingbourne Conservation Area
- This conservation area is one of 8 in the Borough on the national and local Heritage at Risk Register, and this is a material planning consideration as a very high standard of development here and in relation to other opportunity sites is going to be needed to help turn around some of the issues that have resulted in the at-risk status.
- The enquiry property also lies within the relevant plan area for the adopted 2022 Sittingbourne Town Centre SPD.
- The draft proposals are broadly in alignment with the guidance set out in the adopted SPD except for the additional storey, given the guidance on storey heights.
- It is suggested from a Conservation & Design perspective that general encouragement can be given to this proposal, but noting the negative contribution the building makes to the at-risk conservation area at the present time and in its present form, this would be with the following key caveats:

1. There should be a net uplift in the character and appearance of the building, which in turn would result in the building have more of a neutral or even possibly a mildly positive effect on the conservation street scene.

- To achieve this uplift, consideration should be given to the deep cleaning (using an appropriate specialist cleaning method) of the concrete cladding panels on the face of the building, or their replacement (or possible over cladding) with an appropriate high quality clay brick slip product.
- The existing single glazed metal-framed windows (possibly by Crittall) should be replaced by new double glazed steel framed windows in a bronze or other dark colour finish. The difference this can make to the character and appearance of a

building of this type is surprising – the Balfron Tower in East London is a striking example of transformation in this respect, in relation to a classic 1960s Brutalist design by Erno Goldfinger.

2. If there is to be a further level added, this should perhaps be reduced in scale and set back further from the High Street building frontage to prevent the altered building from inappropriately visually over-dominating the adjacent listed Barclays Bank building immediately adjacent. In line with the guidance set out in the Town Centre SPD; the roof top part of the building nearest to the High Street could at least in part be given over to a roof-top communal terraced garden for the occupants of the block, whilst the flat roof top of the extra level could usefully incorporate a shallow parapet to conceal roof-mounted PV panels.

3. Improvement should be made to the rear parking area which in its present form detracts from the immediate setting to the Sittingbourne Conservation Area. As an example of what might be achieved in this respect, the current dwarf walls around the site might be increased in height to conceal the parked cars, but further thought is needed in this regard around some needed meaningful improvements. S106 contributions towards tree planting in the public highway are another possibility that should be explored.

4. The facing material to be used for any additional level needs very careful consideration in parallel with its fenestration design to ensure the net effect of a high-quality design for this prominent, heritage sensitive town centre location in the Sittingbourne Conservation Area.

- Finally, this is strictly speaking not a conservation & design related matter, but we need to be careful to ensure that each and every flat within the proposed scheme can achieve a satisfactory standard of residential amenity particularly taking into account amenity space, noise, outlook, sunlight and daylight. It seems to me that there may be some challenges in this respect, albeit challenges which can feasibly be overcome, or at least mitigated to an acceptable degree.

The proximity of the Barclays Bank building (to the east, number 79 High Street) to the proposed development site means that a Heritage Impact Assessment should be provided with any planning application to consider the impact of the proposed development on any heritage significance which number 79 High Street derives from its wider setting.

In doing so, the applicant/agent should refer to and reference the guidance provided by Historic England in this regard, concerning The Setting of Heritage Assets, see:

<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/hea-g180-gpa3-setting-heritage-assets/>

URBAN DESIGN

The Swale Borough Council Urban Design Officer has been consulted and provided the following feedback:

- The site is within the Sittingbourne Conservation Area and within the setting of a few listed buildings. There is limited information submitted analysing the character of the surrounding area and explaining the design rationale particularly in relation to the additional height and bulk and how that would relate to the context. As such, a contextual analysis should be undertaken to explain the design response and how

the proposed development could be better integrated to the existing townscape. Also, can a series of long, medium, and shorter views be produced to show how the proposal would sit relative to its surroundings?

- The existing 20th century building occupies a prominent corner location. It sits with a High Street of varied roof heights and designs but predominantly 2/3 story buildings near this building. For the most part building height is concentrated along the High Street, falling away towards the rear of plots. Where three storey height is retained, on the opposite side of Central Avenue for instance, this is heavily modulated and broken up into different volumes.
- Here the proposed rear extension would respect the design of the existing building by continuing its pattern of windows and panelling, its overall effect would be to significantly increase the height and bulk of the building rearwards. Whilst the Sittingbourne Town Centre Supplementary Planning Document (SPD) suggests additional height could be accommodated along Central Avenue, here the additional height and bulk would create a long unrelenting frontage along the street and stark differentiation in height at the rear where it sits close to a single-story building. The covered parking area may also have security by design issues that need consideration and discussion with Kent Police.
- This impact is exacerbated by the additional height and bulk of the roof extension, notwithstanding the setbacks proposed. The existing building turns the corner from the High Street to Central Avenue with a canted end. The roof extension, however, is positioned away from the high street being concentrated on the return along Central Avenue which only serves to draw additional height away from the High Street, contrary to its character. Also, the abrupt termination of the roof extension relates poorly to the existing building's canted end. This relationship appears very awkward in the CGI submitted (BTW the CGI does not show rear extension which is misleading). Its form and appearance are very solid with dark cladding, limited articulation, or fenestration. This gives a heavy appearance that both highlights its bulk and form in views from the surrounding area and against the skyline.
- For the Council to accept the additional height and bulk in view of the SPD, it is suggested that the roof extension be either brought forward to address the corner in the same way as the front elevation or set back along Central Avenue façade so that it does not impinge on the corner (High Street) façade. Either way the roof extension needs a lighter appearance perhaps with glazed panels to reduce visibility against the skyline and integrate with the pattern of openings below. Also, deeper setbacks are required to reduce its bulk in views. Also, could the bulk and height of the rear extension be modulated to reduce the experience of a lengthy unbroken façade along Central Avenue.

HOUSING

Quality of accommodation

Policy DM 14 of the Local Plan provides general development criteria and requires that development does not result in significant harm to amenity. Paragraph 130 (f) of the NPPF states that decisions should ensure high standards of amenity for existing and future users.

The Council's Design and Extension - a guide for Householders Supplementary Planning Guidance (SPG) suggests that at least 21m separation distance should be maintained between habitable room windows in different dwellings.

The Technical housing standards – nationally described space standard (2015), sets out internal space standards for new dwellings. The standards would be used as a guide to help in the assessment of the adequacy of the proposed dwellings. The Council would not only consider the size of dwellings in forming a view as to the quality of accommodation, but also to aspect, the position of windows, the ability of rooms to accommodate furniture, floor to ceiling heights, access to amenity space etc. Taken together a balanced view as to the adequacy of the proposed dwellings will be made.

As part of the application submission, plans and schedules should be provided (schedule should ideally be in Excel) setting out for each unit the following:

- The size of the unit (e.g. 1 bed, 2 bed etc)
- Internal floors areas (GIA)
- External amenity space
- Parking spaces for the unit
- Tenure

Significant concerns are raised in terms of the quality of the external amenity space for all the residential units. You are proposing roof terraces for the additional 4th storey, however a statement would need to be submitted explaining how the new occupants on the lower floors would have access to open / amenity space. Consideration could possibly be given to a roof terrace as potential compensation, providing this would not conflict with objectives of preventing any impact on the conservation area and overlooking any neighbouring residents.

Affordable housing

Policy DM8 of the Local Plan states that for development of over 11 units on sites in Sittingbourne 10% of dwellings should be affordable.

Of the 14 homes proposed 2 should be affordable (with 1 being an affordable first home and 1 being affordable rent).

The affordable homes should be well integrated within the development and be a reasonable and proportionate mix to the open market homes so that they are comparable to the private sale homes and meet the broad needs of all households on the Council's Housing Register.

If the total number of homes, or the mix of types of dwellings change through the planning process, a revised reasonable and proportionate 10% will need to be further agreed with the Council, with the correct policy compliant tenure split also applied.

Swale BC is a non-stock holding authority; therefore, a Registered Provider (RP) will be required to deliver the affordable homes on this site.

There is a large and increasing need for affordable homes across the whole borough, with homelessness and the use of temporary accommodation increasing and far outweighing new supply and existing provision of all types of affordable housing. I can confirm that Swale's Housing Register demonstrates a need for all types and sizes of accommodation for those in housing need in Sittingbourne including older persons housing and adapted homes.

Accessible housing

Policy CP3 of the Local Plan states that dwellings should meet the needs of specific groups including disabled persons and as the scheme is developed details should be provided to show how this could be achieved. To demonstrate accessibility requirements have been met, a commitment to providing accessible housing should be submitted in support of any future planning application.

In line with Policy's DM8 and CP3 of the Local Plan the affordable homes should be designed for use by disabled persons and made available for a variety of groups including families, vulnerable and older persons. As such there should be a few accessible and wheelchair adaptable homes provided, and it is recommended that the social/affordable rented homes be provided to Part M4(3) standard (wheelchair user dwelling) with the remaining affordable homes provided to Part M4(2) standard (accessible and adaptable dwellings).

The guidance of Local Plan Policy CP3 indicates a requirement for 1, 2, 3 and 4-bedroom dwellings. As proposed the housing mix is heavily skewed towards 1 bed units and a more balanced mix of units should be provided. Studio flats should not be included.

Play space

Please clarify what is anticipated in terms of child yield and what is proposed in terms of play space. If no space is available on site, then a financial contribution towards off site play space would be required.

LANDSCAPING

As part of any submission, the Council would expect it to be accompanied by an updated tree survey together with a full arb impact assessment, method statement and tree protection plan all in accordance with BS5837:2012. This must include an assessment of trees which are off site but close enough to be at threat from the development.

An indication should be provided at application stage as to how landscaping could be provided. Some form of indication (ideally through a landscape parameter plan) of where landscaping would be provided (with buffers between proposed and existing development) should be provided.

You are also directed to the Council's guidance on planting on new developments, a link to which is here: [Untitled-2 \(swale.gov.uk\)](#) this should be used to inform landscaping proposals.

Any application would need to demonstrate biodiversity net gain, and actively promote expansion of biodiversity within the design of the new development.

TRANSPORT, HIGHWAYS AND PARKING

Policy DM 6 of the Local Plan requires development proposals that generate a significant amount of transport movements to be supported by a Transport Assessment (including a Travel Plan), which will be based on the Council's most up to date strategic modelling work. In assessing applications, offices would consider how the environmental impacts of traffic could be managed.

There is no indication of the potential of the existing site to generate trips or what the proposed trip generation would be. This prevents an understanding of potential highway impacts. Going forward information is required to understand what the net increase in trip generation would be.

The existing access to the site from St Michaels Road is proposed to be used to access the site. Policy DM 6 of the Local Plan is relevant, and evidence would be needed to show that the access would be of a suitable safety standard for the traffic generated by the development. You are advised that the Council would consult with the Kent County Council Highways advisor to understand if the proposals are acceptable.

Kent County Council Highways department offer a pre-application service, and you are advised to engage with that department ahead of any planning application to understand if the proposals (including the new access) could be supported from a Highways perspective. A link to the Kent County Council Highways pre-application advice web page is below:

[Highway pre-application advice - Kent County Council](#)

Parking

Policy DM7 of the Local Plan relates to parking and for residential development and requires parking provision to take account of the type, size and mix of dwellings and the need for visitor parking. Additionally, the parking layout should be efficient and attractive.

The council has a parking Supplementary Planning Document (SPD) which provides guidance on what is expected in terms of parking provision, design and layout. A link can be found below:

<https://services.swale.gov.uk/assets/Planning-Forms-and-Leaflets/Supplementary-Planning-Documents/SBC-Parking-Standards-May-2020.pdf>

The pre-application submission shows the following overall parking provision as being 7 spaces for commercial uses on the ground and first floor. The Council's Parking standards recommend 1 parking space for 1 and 2 bed flats. As such 14 spaces should be provided.

The car parking standard is for guidance and a lower provision could be considered for areas with good accessibility by sustainable modes and/or where effective mitigation measures are in place or proposed, such as car clubs and travel plans, controlled parking zones and access to public transport.

The site is close to Sittingbourne Station and the town centre, as such a reduced level of parking may be appropriate subject to this being justified. However, for the avoidance of doubt, it seems you have provided insufficient for the quantum of housing proposed, and there is an objection to the proposal in this regard.

In establishing the correct quantum of car parking supporting evidence will be required (e.g. local car ownership data, parking stress surveys, evidence from similar sites). The Borough Council encourages permit-free developments to discourage on-street parking.

You are advised to enter into pre-application discussions with Kent County Council Highway and Transportation department to discuss and agree parking provision.

There should be EV Charging for each parking space.

Servicing

Given the site has an existing commercial use and you are proposing refuse and recycling facilities, the servicing of these facilities seems to be acceptable but further consultations will be carried out once the application has been submitted.

Swept path analysis should be provided to demonstrate that the maximum size refuse and emergency vehicle would be able to enter and exit the development, servicing the residential dwellings.

III OTHER MATTERS

Sustainable Design and Construction

Policy DM19 of the Local Plan requires proposals to address climate change and reduce carbon emissions in new developments. The Council's Ecological and Climate Change Emergency Action Plan sets out that new housing developments should achieve a minimum 50% reduction in emissions when compared to target rates in the current Building Regulations. Any application would need to be accompanied by a sustainability statement setting out how the proposals would achieve the required reduction in emissions.

Water, Flooding, and Drainage

Policy DM21 of the Local Plan sets out a various criteria aimed at preventing or reducing flood risk. The NPPF (2021) at chapter 14 sets out government views on how the planning system should consider the risks caused by flooding including Sustainable Urban Drainage Systems (SuDS). Local Plan Policy CP7 requires new development to be supported by the timely delivery of green infrastructure, including SuDS.

IV CONCLUSION

While the site is well located in relation to public transport and the town centre and additionally the redevelopment would make good use of unoccupied office space, the proposal is considered to be a reasonable and appropriate for the existing building. The proposals have potential to improve the character and external appearance of this 1960's style architecture to a more aesthetical please style in relation to the conservation area and having minimum impact on the settings of the adjacent listed buildings.

The site is clearly in a location suitable for redevelopment and as such it is recommended that the scale of the development be reduced, with respect to setting back the proposed 4th storey further away from the building line facing Central Avenue as advised by the Urban Design Officer.

Should you want to make a follow up pre-application advice request. Please follow the link below for further information on the process. [Planning Permission - Ask us for advice before you apply for Planning Permission \(swale.gov.uk\)](https://www.swale.gov.uk/planning/permissions)

There are several complexities involved with the development of this site, and further engagement is recommended to establish the acceptability of the proposals in principle and to resolve matters of detail. This should be done before an application is submitted.

You may wish to consider entering into a Planning Performance Agreement (PPA) with the Council. This is a project management framework where you meet with the planning service and other interested parties before submitting a planning application and discuss and agree how a scheme will go through the planning process.

The two parties agree a time frame for scoping out and developing the scheme. The main point of a PPA is to do as much as possible before submitting a planning application, so that the application proposal is of a high quality.

The level of resource needed for a PPA will depend on the complexity of the scheme. As a bespoke service, there will be a charge for this service, and this will be negotiated with you before work starts on the PPA.

Please consider all the advice given in this letter before submitting an formal application.

Planning Application Process

You are encouraged to lodge an application for the development currently proposed. The advice set out below indicates support for the development proposed. Please note this advice is meant to inform you of the information that would need to be submitted in support of an application.

A planning application along the lines of that which you are proposing would be classified as a 'Major Application'. If you wish to apply the following are likely to be required:

- Full planning application form (including ownership certificate, notice, and agricultural holdings certificate, if relevant);
- Community Infrastructure Levy (CIL) Form;
- Relevant fee;
- Location plan, scale 1:1250 or 1:2500;
- Site plans, scale 1:500 or 1:200;
- Parameter plans;
- Existing and indicative proposed plans, scale 1:100 or 1:50;
- Existing and indicative proposed elevations, scale 1:100 or 1:50;
- Existing and indicative proposed cross sections, scale 1:100 or 1:50;
- Accessibility assessment;
- Sustainability supporting statement;
- Planning statement;
- Planning obligations statement;
- Affordable housing statement;
- Design and Access Statement;
- Draft Construction Management Plan;
- Air quality assessment;
- Sustainability statement;
- Landscaping Strategy;
- Ecological/ Protected Species Survey;
- Tree survey/arboricultural assessment
- Servicing strategy;

- Sustainable Urban Drainage System (SuDS) Strategy;
- Transport Assessment;
- Plans showing any offsite highway works;
- Details of 'Access' (the accessibility to and within the site, for vehicles, cycles and pedestrians in terms of the positioning and treatment of access and circulation routes and how these fit into the surrounding access network)
- Travel Plan;
- Waste and Recycling Strategy;
- Heritage Impact Assessment;
- Land contamination assessment;
- Noise impact assessment.

Note: Please refer to the Council's guidance on information required for valid applications [Validation Checklist Final 2021 April 2022 \(swale.gov.uk\)](https://www.swale.gov.uk) this provides detailed information on the required documents and plans for all types of applications.

Consideration of this Pre-Application Response

Any advice given by Council Officers for pre-application enquiries does not indicate a formal decision by the Local Planning Authority. Any views or opinions are given in good faith, and to the best of ability, without prejudice to the formal consideration of any planning application.

Any pre-application advice provided will be carefully considered in reaching a decision or recommendation on any subsequent application; subject to the proviso that circumstances and information may change or come to light that could alter that position. It should be noted that the weight given to pre-application advice notes may decline over time.

The final decision on any subsequent application that you may make can only be taken after the Local Planning Authority has consulted local people, statutory consultees and any other interested parties.

Yours faithfully

Saeed Mahmood
Consultant, Majors Team, Development Management
Planning Services
Swale Borough Council

Please see Appendix on next page.

Appendix 1: Policy and other considerations

The National Planning Policy Framework (NPPF): Paragraphs 11, 38, 39, 40, 41, 42, 47, 55, 56, 60, 65, 75, 92, 104, 110, 111, 112, 119, 120, 124, 126, 130, 131, 134, 157, 167, 169, 174, 180, 183, 185, 194, 199, 202, 203.

Swale Borough Local Plan 2017 policies

- ST1** Delivering sustainable development in Swale;
- ST2** Development targets for jobs and homes 2014-2031;
- ST3** The Swale Settlement strategy;
- ST4** Meeting the Local Plan Development Targets;
- CP2** Promoting Sustainable Transport;
- CP3** Delivering a Wide Choice of High-Quality Homes;
- CP 4** Requiring Good Design;
- CP 7** Conserving and Enhancing the Natural Environment;
- CP8** Conserving and Enhancing the historic environment.
- DM 6** Managing Transport;
- DM 7** Vehicle parking;
- DM 8** Affordable Housing;
- DM 14** General development criteria;
- DM 19** Sustainable design and construction;
- DM 20** Renewable and low carbon energy
- DM 21** Water, flooding and drainage;
- DM 32** Development involving listed buildings.

Supplementary Planning Documents

Parking Standards (2020),
Swale Borough Council's Noise and Vibration Planning Technical Guidance (2020),
Swale Borough Council's Air Quality and Planning Technical Guidance (2021)
Planting on new development – a guide to developers,
Kent design – A guide to sustainable development (2000).
The Sittingbourne Town Centre Supplementary Planning Document (2022)