



c/o [REDACTED]

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Your Ref: PE/24/00112

Date: 7th February 2025.

Town and Country Planning Act 1990 (As Amended)

Proposal: Erection of 9No. dwellings

Location: St Georges Parish Hall, Middle Street, Deal, Kent

I am writing with response to your pre application enquiry received on the 23rd October 2024 and the subsequent meeting on the 10th December 2024 for the demolition of the existing hall and the erection of 9no. new dwellings with associated cycle and, refuse storage together with amenity space.

Within your pre application letter you have requested that certain points are addressed, and I will go through them individually below;

The first two points to be clarified are a) principle, b) the scope and results of the community facility audit. These are covered below:

- a) The proposed development is within the settlement confines of Deal within a sustainable location where windfall housing development is supported, in accordance with Policy SP4. As discussed below St Georges Hall is deemed to be a non-designated heritage asset as set out below and is considered to be a community facility being used by the church and other groups. and as such policy PM6 of the local plan applies.
- b) The NPPF requires decision makers to 'plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments' and 'to guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs'. This is reflected by Policies SP2 and PM6 of the Local Plan.

Policy PM6 of the local plan sets out amongst other things 'any community facility or service that makes a contribution to the social or cultural life of a community should be retained unless suitable alternative provision already exists, new provision is provided or the need for the provision is demonstrated to be obsolete.

As part of the planning application process, it is essential to provide robust and convincing evidence to demonstrate that the loss of a community facility is justified under Policy PM6 of the Dover District Local Plan. This policy seeks to protect existing community facilities unless it can be clearly proven that there is no longer a viable demand or use for the

facility. Applicants must present comprehensive evidence that the facility has been actively marketed for a reasonable period, that alternative provision exists within the locality, and that there are no other viable alternatives for its continued use. This could include details of marketing efforts, surveys of community needs, and information about the accessibility of nearby facilities. Without such evidence, the application is unlikely to comply with the policy's aim of safeguarding essential community infrastructure.

Having reviewed the audit, I am satisfied the summary of alternative venues covers a sufficient distance with some venues being within close walking distance, with similar facilities i.e kitchen areas. I have also noted appendix c which provides an up-to-date survey of the condition of the existing building and the estimated cost of repair. I would suggest that you provide a financial statement explaining why the repairs would be uneconomical to repair and whether there has been a drop in demand of the existing building to satisfy criterion b) of policy PM6. Within policy PM6 criterion b) it sets out that there is clearly demonstrated that there is no longer a current demand, and for such a facility or for alternative community use or any real prospect of such a demand arising within a realistic timescale.

Subject to receiving the information as set out above, I consider the proposed development is considered acceptable.

Points C and D relate predominantly to the siting, arrangement and finishes, these are covered below.

The pre-app submission is supported by a Heritage Statement which states in paragraph 2.16 that the site is not a non-designated heritage asset. However, many points are made in the Statement of Significance that demonstrate that the building and site are indeed such, so the contradiction is strange. For clarity, the site is considered to be a non-designated heritage asset. As such, you would need to justify the public benefits against the loss of the NDHA.

Furthermore, the paragraphs outlining the significance of the site in respect of its contribution to the conservation are brief, albeit recognising the value of the older building on the site, however, a more detailed analysis would be required on the school yard; along Middle Street itself, the conservation area is characterised by a narrow, winding street with very few historic open spaces providing respite from the dense built grain. Largely, respite comes from the junctions of the various streets as they cross or meet Middle Street where a view is then afforded up towards the sea (although the sea itself is not visible) or towards the High Street, or very occasionally the rear garden of a dwelling. The assessment notes the surrounding boundary wall as a neutral feature in the conservation area, but this is disputed by DDC Principal Heritage Officer. Boundary walls are a feature not generally found in the conservation area but where we have a historic wall, they seem usually to be high and contribute to the sense of enclosure that is a characteristic of the conservation area. The boundary wall appears well constructed and is not completely utilitarian in appearance. Its height prevents the schoolyard being an uncomfortable gap with too open a character, such as is the experience of the modern car park at the junction with Oak Street.

The reason for drawing your attention to the open space, is because proposal seeks to introduce the largest unit at this corner. There is potential the proposal may appear overbearing and oppressive both on the street scene and the adjacent listed building, particularly when viewed from the contained vantage point of Chapel Street. This little lane is possibly one of the narrowest in the core of the conservation area. At the pre application stage, it would have been beneficial if the drawings had contained accurately scaled impressions of how the development would appear from this point.

In respect of the design approach for the units facing onto Middle Street, although the oriel windows are considered to be too large and would have the impact of being somewhat overbearing (oriel windows in principal are not a concern) and the colour of the render must accord with the local vernacular, i.e. off whites and pale stone: pink and yellow are not colours that we would wish to introduce to the conservation area (any reference to buildings found

elsewhere in the conservation area that are that colour need to be recognised as unlawful in several instances). Again, railings are few and far between in the conservation area and for these to be successful in respect of protecting the significance of the conservation area these would need to be traditionally detailed and installed; quality in details and materials will be essential. With regards to the units to the rear units, as they are only capable of being appreciated when within the courtyard, and this space has no significant interaction with the surrounding historic streets I no raise any concerns.

In respect of the descriptions of development for the anticipated planning and listed building consent application, associated works isn't normally considered acceptable as its not explicit enough. DDC heritage team do their own validation and amend the descriptions accordingly. I would suggest in a covering letter you include a brief list of the works to enable them to do this quickly.

I have noted you are setting the development out to being a 'car free' housing development, I would suggest that you undertake a separate pre application response from Kent Highway Services. However, from a DDC perspective, the proposed site is within a sustainable location within easy walking distance to a range of services and facilities, with access to bus stops within close proximity to the site and as such would be compliant with policy TI3.

Point G of your letter would like clarification with regards to the BNG being exempt (de minimis) .

Aerial photographs of the site indicate that it is all hard standing / buildings with no semi-natural habitat. The potential ecological value is limited to species that could use the building for shelter, such as bats and nesting birds.

The Preliminary Roost Assessment (not submitted but referred to in the Bat Survey Report) and the Bat Survey Report must be submitted with the application to provide full details of the survey efforts and conclusions and ensure the appropriate level of scrutiny can be given by DDC.

Without prejudice to DDC's review of the Preliminary Roost Assessment, further ecological survey work does not seem necessary at this time. If more than 18 months elapses from the date of the bat surveys until the application is submitted, updated survey work may be required.

Notwithstanding the detailed review. Given that the building was assessed as providing high suitability for roosting bats, it is expected that commensurate opportunities for roosting bats will be provided in the new buildings to ensure that there is no loss of potential roosting spaces for bats.

All planning applications, with a few exemptions are subject to mandatory biodiversity net gain. Due to the apparent lack of habitats on the proposed development site, it is likely that the development will not impact a priority habitat and will impact less than 25 square metres of on-site habitat and less than 5 metres of linear habitats (e.g. hedgerows). This should be verified by the applicant / their ecologist and confirmed in the application form, with supporting evidence if necessary. If this is the case, mandatory biodiversity net gain will not apply to the application.

Furthermore, as you have noted, the application site is located within the zone of influence for strategic access management and monitoring area (SAMM) for mitigating recreational impact on habitat (the Thanet Coast & Sandwich Bay Special Protection Area (SPA) and such a tariff will need to be paid, these can be found at: [Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy \(SAMMS\)](#).

With regards to any other technical issues arising from the proposal. The application site is located within the strategic highway zone (policy SP12). Deal is within zone 3 (blue) and the per dwelling is £2,100, this will need to be secured by way of a Section 106. More information can be found at; [Infrastructure Delivery](#).

PPA

As part of the pre application meeting we discussed a potential PPA. If you would like to pursue a PPA, please let me know and I will forward to you the PPA template and an estimated costing.

As you have set out and would like clarified the application would need to comprise of;

- Full set of existing and proposed floor plans, section and elevations, scaled impressions,
- Heritage statement.
- Planning statement.
- Audit of community facilities, to include financial statement.
- Statement of community involvement.
- Design and access statement.
- Bat survey report.
- Desk-based archaeological report.

You will appreciate that this advice is given at officer level only and is not binding on the Council. Should you decide to submit a planning application, it may be that other issues may arise during the consultation period.

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Senior Planner