

Planning Statement

26-27 Tower Hamlets Street, Dover, CT17 0DY

M J Real Estate

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1.0 Introduction

This Planning Statement is prepared for the proposed development of 26-27 Tower Hamlets Street ('the site'), Dover, CT17 0DY and is submitted on behalf of M J Real Estate Ltd.

The site is currently an unoccupied two storey terraced building, most recently in use as a public house 'The Dewdrop Inn' (Use Class Sui Generis). The use ceased earlier this year after facing several years of challenging viability issues. The premises are currently vacant. Further information on the former use can be provided to the LPA upon request, if deemed necessary.

The planning application seeks full planning permission for:

"Change of use from Public House (Use Class Sui Generis) Residential House in Multiple Occupation – Large (Use Class Sui Generis) and erection of dormer extension in rear roof slope".

The application is accompanied by a series of supporting plans and documents.

- Application form
- Planning Statement (this statement)
- Existing floor plans and elevations
- Proposed floor plans and elevations

This statement sets out the details of the proposed development and assesses the merits of the proposal within the adopted and emerging planning policy framework.

The development would make efficient use of an under-utilised, currently vacant site, providing a redevelopment which will contribute to the local housing stock and help meet local housing needs.

2.0 The Application Site and Surrounding Area

The application site consists of a two storey building and is currently unoccupied. It was most recently in use within Use Class Sui Generis (Public House).

The site is located on the northern side of Tower Hamlets Street, as a mid-terrace property. Whilst the building is two-storey, it has a raised roof profile in relation to the remainder of the two storey terrace in which it is located. It has a rear open yard and access.

The immediate surrounding area is predominantly characterised by residential properties consisting of two storey residential buildings.

Dover Town Centre is located in close proximity to the site, to the east & south of the site, with a range of commercial and residential uses. The boundary of the designated town centre is less than half a mile from the site.

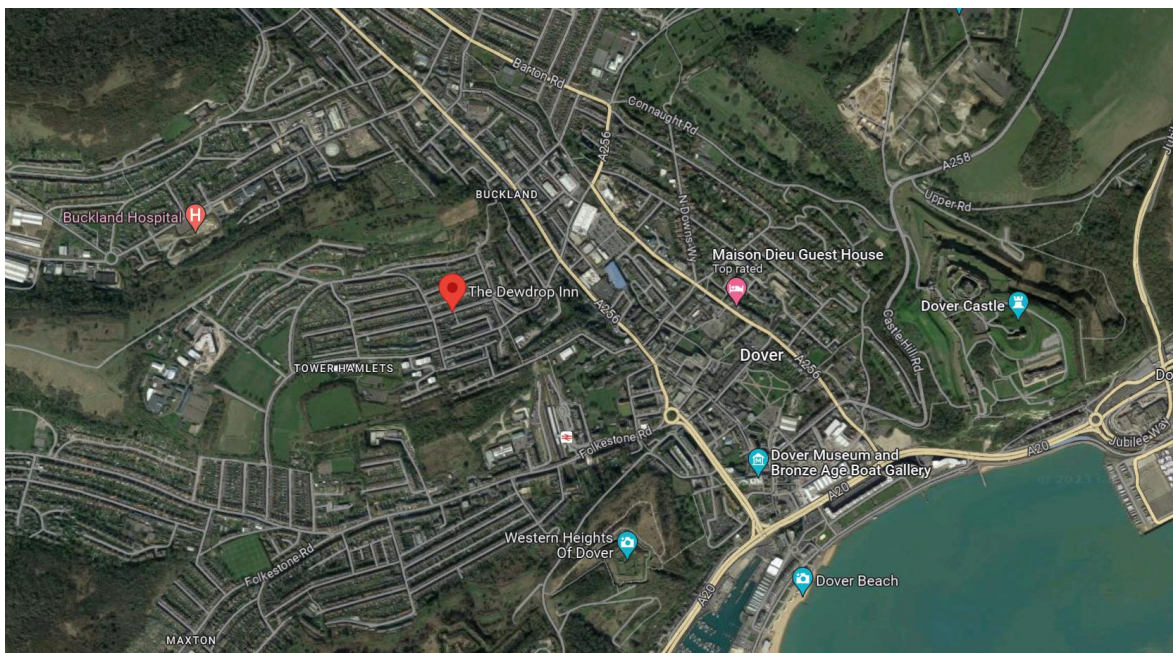


Fig 1: Aerial site view (Google Maps)

The internal layout of the building currently comprises a ground floor of a public house use, with bar area, serving area, kitchen, storage areas and WC facilities. The upper floor comprises two bedrooms, bathroom, kitchen and living area for use in connection with the former landlord/tenant of the public house use, with loft space above.

Tower Hamlets Street is a two-way vehicular highway, with parking on one side of the highway only. Dover Priory mainline train station is 0.4 miles from the Site, around 10 minutes' walk.

The site lies within Flood Risk Zone 1, which means it is at the lowest level of risk from flooding.

3.0 Planning History

A search of Dover District Council's (DDC) planning register has identified no relevant planning applications directly relating to the application site, with only a minor application in 2002 for a flat roof to the WC facilities (ref. 02/00028) being registered.

4.0 The Proposed Scheme

The proposed development seeks full planning permission to change the use of the premises from a Public House (Sui Generis Use Class) to a large House in Multiple Occupation (HMO) (Sui Generis Use Class). A dormer extension would be erected on the rear roof slope.

The development would provide 14 x bedroom/living accommodation spaces, with shared kitchen/dining/reception areas, to be classified as a Large HMO in the Use Classes Order 2020 (as 7 residents or above).

11 of the rooms would have private en-suite WC and shower facilities.

The ground floor would comprise 6 bedrooms, with the kitchen, dining and reception room. 4 of the rooms would have private WC and shower facilities. Two additional shared WC facilities, with one shower room would also be available on the ground floor.

The first floor would also comprise 6 bedrooms, 5 of which would have private facilities, with one additional WC facility available.

The second floor would have accommodation in the roofspace, with two bedrooms, each served by private shower and WC facility. The second floor accommodation would be facilitated by the erection of a dormer extension in the rear roof slope.

The main entrance to the property would be from Tower Hamlets Street. At the rear, the premises has access to an open area of hardstanding for communal outside space, with pedestrian access also connecting to South Street. This area will provide external space and an area for refuse, recycling and cycle storage.

The dormer extension would be the only external change to the existing building. The front façade and fenestration arrangement would all remain as existing, retaining the Public House name, general appearance and signage.

5.0 Planning Policy Context

The following Section provides a brief overview of the planning policy and guidance which is considered of relevance to the proposed development. The Statement demonstrates how the development complies with key objectives of planning policy and guidance at a national and local level.

In accordance with Section 38 (6) of the Planning and Compulsory Purchase Act 2004, planning applications should be determined in accordance with the development plan unless other material considerations indicate otherwise.

National Planning Policy Framework (NPPF) (September 2023)

The NPPF was published by the Government in March 2012 and revised in July 2018, with further amendments in February 2019, July 2021 and September 2023. It sets out the Government's planning policies for England and how these are expected to be applied. The document is a material consideration that is afforded significant weight in the determination of planning applications.

The role of the planning system in the economy is identified as ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and the provision of infrastructure.

The key element running through the NPPF is a presumption in favour of sustainable development, of which there are three interdependent dimensions which should be sought jointly and simultaneously through the planning system: economic, social and environmental.

Social sustainability relates to providing a supply of housing to meet needs in a high quality-built environment with accessible local services. The environmental role for planning is defined as contributing to protecting and enhancing our natural, built and historic environment which includes improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change including moving to a low carbon economic dimension. The economic objective of planning involves the building of a strong, responsive and competitive economy, through 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.

NPPF Paragraph 11 very clearly states that proposals that accord with the development plan should be approved without delay. Permission should also be granted where there are no relevant development plan policies or the policies most important for determining the application are out of date unless specific policies in the NPPF indicate development should be restricted or there are adverse impacts which outweigh its benefits.

Delivering a Wide Choice of High Quality Homes

Section 5 'Delivering a sufficient supply of homes' sets out the Government's objective of significantly boosting the supply of housing supply. It attaches great importance to ensuring the supply of and delivery of housing.

As set out at paragraph 68, the LPA is required to identify a supply of specific deliverable sites sufficient to provide housing for years 1-5 of the development plan and specific developable sites for growth to provide housing for years 6-10 and, where possible, for years 11-15 of the plan.

Paragraph 62, states that to deliver a wide choice of high-quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities the size, the type and

tenure of housing needed for different groups should be addressed and reflected in planning policies. This includes assessing those who require affordable housing, families with children, older people, people with disabilities and travellers.

Requiring Good Design

Section 12 'Requiring good design' sets out the requirements for achieving well designed places. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

NPPF Paragraph 127 states that plans should, at the most appropriate level, set out a clear design vision and expectations so that applicants have as much clarity as possible. Furthermore, design policies should be developed with local communities so that they reflect local aspirations.

Paragraph 130 states that planning policies and decisions should ensure that developments:

- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
- optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;
- respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation; and
- create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.

Planning Practice Guidance

The Planning Practice Guidance (PPG) was introduced in 2016 and was most recently updated in 2021 to complement the NPPF.

The Housing and Economic Needs Assessments section of the PPG seeks to support planning authorities in objectively assessing and evidencing development needs for housing. The Guidance states:

“The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes.”

The Guidance also clarifies that strategic policy-making authorities need to look at the current stock of houses of different sizes and assess whether these match current and future housing needs. They will need to develop an idea of future needs based on a range of data which is current and robust.

DDC’s published position on housing supply (April 2023) indicates 5.38 years housing land supply. HMOs are an important contribution to local housing stock, serving a key local need and affordability levels.

Dover District Council Local Plan

The Dover District Council Local Development Plan consists of the following:

- Core Strategy 2010 (Annex 1 Development Management Policies)
- Land Allocations Local Plan 2015;
- Saved policies Places and Policies Local Plan 2002;
- Kent Waste and Minerals Local Plan 2016

Key Core Strategy Policies

- CP1 Settlement Hierarchy
- DM1, Settlement Boundaries
- DM11 Location of Development and Managing Travel Demand
- DM13 Parking Provision

DDC Emerging Local Plan

The Dover District Local Plan was submitted for Examination on Friday 31st of March 2023. The draft plan policies remain in emerging status and are therefore afforded due weight. The most relevant policies are as follows:

- H7 (Houses in Multiple Occupation)
- PM1 (Achieving High Quality Design, Place Making and the provision of Design Codes)
- PM2 (Quality of Residential Accommodation),
- TI 1 (Sustainable Transport & Travel)
- TI3 (Parking Provision on new development)

6.0 Planning Policy Assessment

This section will assess the proposed development against the planning policy highlighted in Section 5. The key material considerations are:

- Principle of Development;
- Character and Appearance of the Area;
- Residential Amenity;
 - Living conditions of future occupiers
 - Impact of the development on neighbouring properties
- Highways and Parking.

The planning assessment below is based on the plans and documents submitted in support of the application.

Principle of Development

The site is located within the settlement confines within a Secondary Regional Centre, and the creation of residential accommodation in this location would accord with Policies CP1 and DM1.

Policy DM24 (Retention of Rural Shops and Pubs) is not applicable as the site is not in a rural location.

As an existing Sui Generis use (Public House), the proposed development would require a change of use to an alternative Sui Generis use (Large House In Multiple Occupation occupied by 7 residents or above).

The application site falls within the settlement confines identified in policy DM1. The property is close to a bus route (Lowther Road – no. 63), less than 10 minutes walk to Dover Priory station, and all town centre amenities with local facilities. The site is a sustainable location for residential use in accordance with DCC adopted policies DM1, DM11.

A residential use, adjoined and surrounded by other residential uses, in a sustainable location makes efficient use of a vacant site.

Further, the emerging DDC Local Plan draft policies TI1 and TI3 which seek to support sustainably located residential development which do not rely on cars and parking provision, support residential use in this location.

In addition, draft Policy H7 outlines that proposals for HMOs will be supported where the development taken by itself and in combination with existing HMOs in the vicinity of the site would not:

- result in an adverse impact on the living conditions of existing adjoining residents.
- have an unacceptable impact on highway safety including insufficient parking
- have an adverse impact on the visual amenity and character of the area including that from inappropriate or insufficient arrangements for refuse and cycle storage.

The proposal would accord with draft policy H7. The following sections of this statement and plans submitted demonstrate the quality of residential accommodation provided. In principle however, the use of the premises as an HMO in this location is supported by adopted and emerging DCC policy.

Draft DCC Local Plan policy PM6 Community Facilities refers to the loss of existing community facilities and services. The draft policy includes pubs as within the definition of community facilities. As noted in Section 1.0, the previous public house use faced several viability challenges and was not able to continue trading.

The draft PM6 policy includes criteria to accept the change of use from a pub including sub-criteria 'a)

Alternative provision of the same or similar service or facility is already available in the local area, and accessible to residents in that catchment area;

Being in a sustainable location, close to the DDC centre, there are several public houses and drinking establishments within the local area which provides alternative provision.

Character and Appearance of the Area

The general appearance of the existing building and street facing façade would remain as existing. Low level street facing planting would be installed on the front. There would be minimal change to the front facing elevation and the positive impact on the street scene would continue in terms of the building's existing character. Refuse and cycle storage would be located at the rear, in accordance with emerging policy H7.

At the rear, a dormer extension would be erected on the rear roof slope. The extension would be sensitively designed and subservient to the main building. It would retain separation to the sides and ridge height, ensuring original roof slope remains visible and the addition is not unduly dominant. It would be finished in materials to match the existing roof.

It is recognised that the change of use from a Public House to an HMO would also introduce and change in character as to the premises' operation and function within the street. As a residential use in the residential location, this change is fully cohesive with the existing surrounding area. Located within an area comprised of dense terraced housing, in close proximity to the town centre, the introduction of an HMO is an appropriate use for the former Public House.

Residential Amenity

Living conditions for future occupiers

The proposed plans demonstrate that the layout is in accordance with DDC's HMO standards. Each bedroom, living, kitchen and WC space is compliant. Of the 14 rooms, 11 rooms have private en-suite facilities. There is a shared kitchen and living space on the ground floor.

DDC emerging Local Plan draft policy PM2 outlines the need for residential development to meet the latest Nationally Described Space Standards.

All the bedrooms exceed the sizes currently described and have windows for light and ventilation. External space is available for communal use and bike storage.

The rear area also includes space for refuse and recycling.

Impact of development on neighbouring properties

As the proposed development located in a primarily residential area, it will have an acceptable relationship with neighbouring uses and existing residential uses. As a former Public House use, the

change to residential is likely to have less potential for noise and disturbance, comings & goings and general activity associated with the typical use.

The rear dormer window addition and internal layout changes will not create any additional increased ability to overlook adjoining land than the existing premises. It is noted that the existing layout has side facing habitable room windows.

The development will not result in any undue impact towards existing neighbouring properties in terms of privacy, visual intrusion or loss of outlook, daylight or sunlight.

Highways and Parking

The site is located in a sustainable and accessible location with good access to Dover Town Centre with a wide range of shops, amenities and services. The site also benefits from excellent public transport links, including bus routes and short walk to Dover Priory Station.

As an HMO property in a sustainable location, no designated parking is proposed. This is considered acceptable for the location and in accordance with encouraging sustainable travel methods outlined in the emerging DDC Local Plan T11 and T13

1 cycle space would be provided per bedroom (14 in total), with stands provided in the locked, secure rear yard, in accordance with emerging policy H7.

The development would not result in an increase in traffic movements, with potential for less than the current Sui Generis use, which may attract pick ups and delivery vehicles.

The development is in accordance with the highways and parking policies of the adopted Local Plan.

7.0 Conclusion

The proposed development accords with national and local planning policy guidance, conforming with Core Strategy and adopted and emerging DDC policies.

The proposed scheme involves the efficient use of a vacant site to provide residential accommodation to meet local need, in a highly accessible and sustainable location.

The development will provide economic, social and environmental benefits and constitutes sustainable development.

The application should therefore be approved without delay.