SECTION D DEVELOPMENT TO BE CARRIED OUT BY THE COUNTY COUNCIL

Background Documents – the deposited documents, views and representations received as referred to in the reports and included in the development proposal dossier for each case and also as might be additionally indicated.

Item D1 Single storey modular building for Children's Centre, Hornbeam Primary School, Great Mongeham, Deal – DO/08/320.

A report by Head of Planning Applications Group to Planning Applications Committee on 17 March 2009.

Application by KCC Children, Families and Education for single storey modular building at Hornbeam Primary School, Mongeham Road, Great Mongeham, Deal, (Ref: DO/08/320)

Recommendation: permission be refused

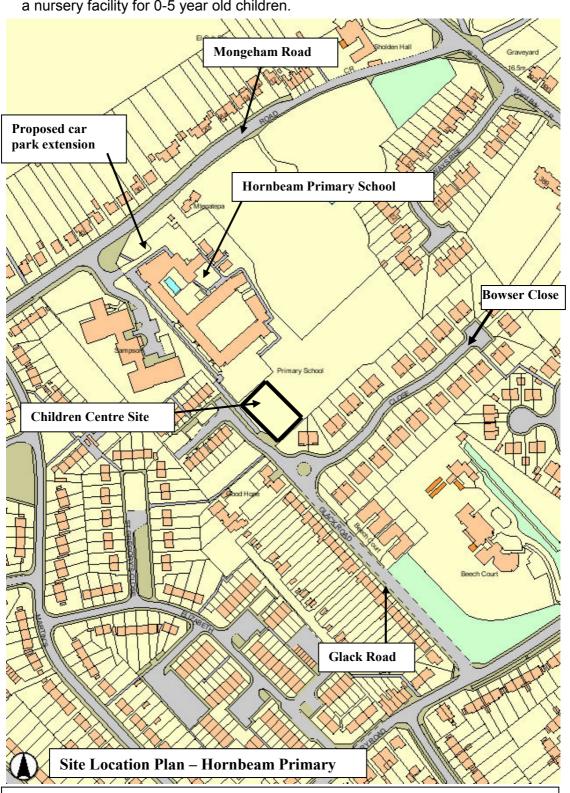
Local Member(s): Mr Terence Birkett and Mr Mike Eddy Classification: Unrestricted

Site

- 1. Hornbeam Primary School is located in the village of Great Mongeham, which is to the west of Deal. The school site is an 'L' shape and surrounded by residential properties on all sides. To the north of the site is Mongeham Road and residential properties are located on the opposite side of the road. To the east is a large property with extensive grounds, whilst to the south there are properties that back onto the school site that are accessed off Bowser Close. To the west of the site is another residential property called Sampson Court, which is accessed solely off Mongeham Road. The school has a single vehicular access, which is off Mongeham Road and parking for staff is in front of the school. There is also a pedestrian access at this location.
- 2. The school has another pedestrian access point to the south of the site, which is accessed off Glack Road (a cul-de-sac) by means of a gated walkway between the school and Sampson Court. This gated walkway is only open at the start and finish times of the school. There is currently a field access to the school and an area of hardstanding (where the parents wait for the gate to the walkway to open) at the end of Glack Road. This is where the proposed Children's Centre and vehicular/pedestrian access is proposed. There are also a number of trees located within the school playground which follow the line of the gated walkway which are affected by the proposed development. <u>A site location plan is attached.</u>

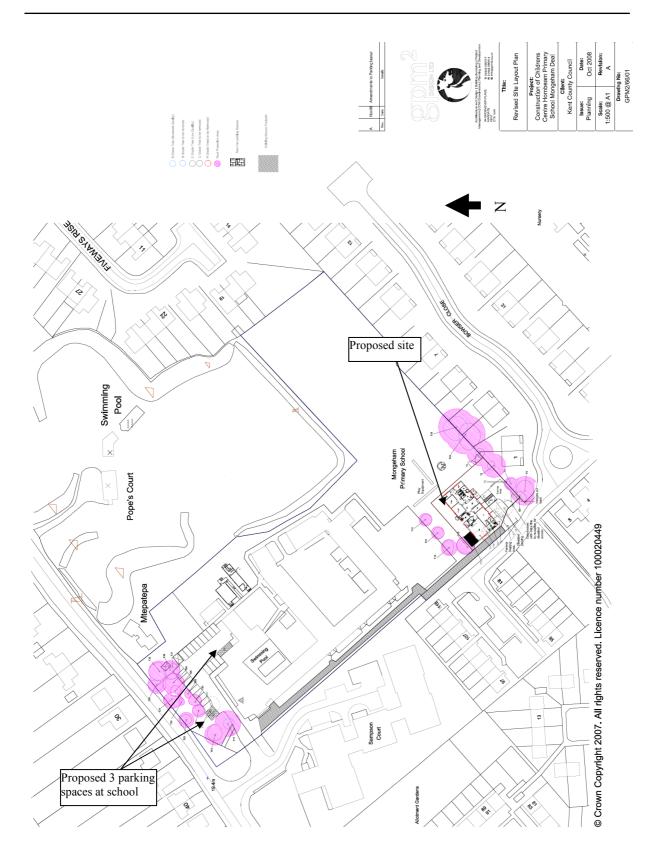
Proposal

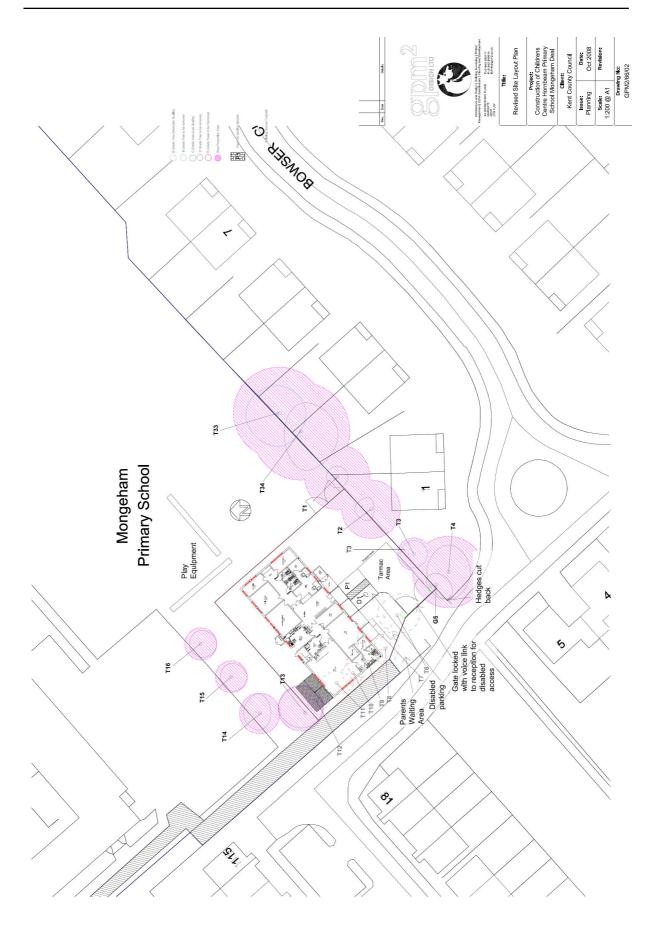
3. The planning application is for one of 52 new Children's Centres across Kent, which are part of the Central Government's National Sure Start Programme. The main aims of the Sure Start programme are to increase the availability of childcare for young children and support parents in their aspirations towards employment. The applicant states that the area identified for the new build half core Children's Centre has been chosen because it is ideally suited to provide a separate access for both visitors on foot and staff by car. The Children's Centre would offer a range of health, adult



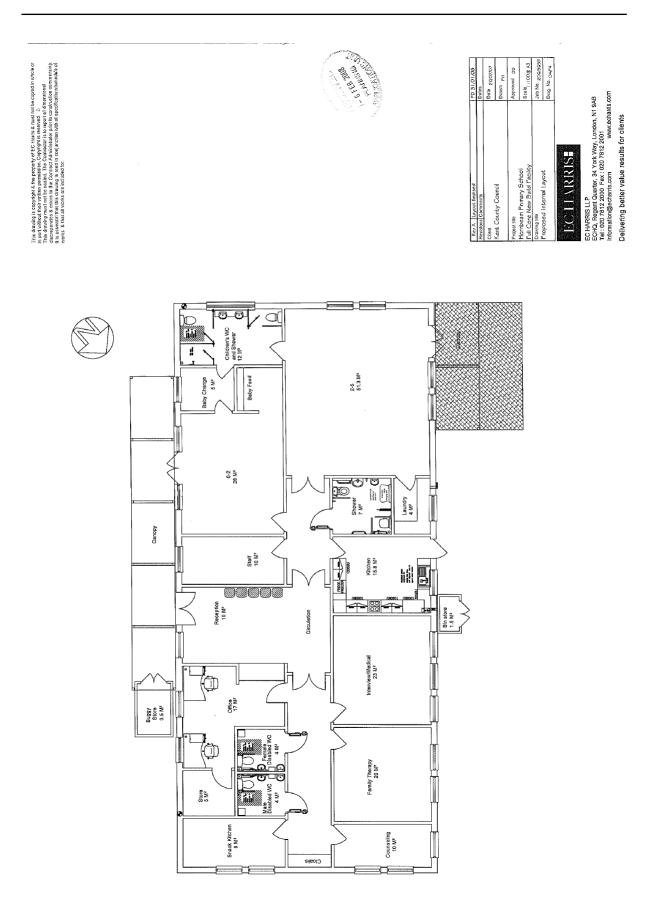
education and family support services. Alongside with these services, there would be a nursery facility for 0-5 year old children.

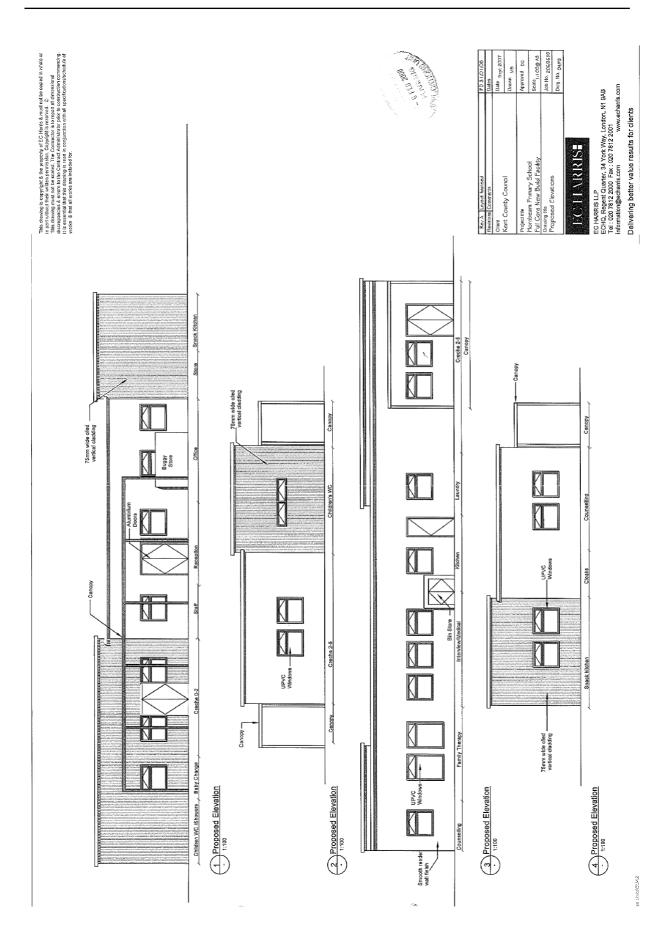
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Item D1





Item D1

- 4. The planning application has been submitted by Kent County Council's Children, Families and Education Directorate. The Hornbeam Primary School site has been identified as part of the Kent strategy as having surplus capacity and a need in the area for a Children's Centre. The proposed catchment area for this Children's Centre is the Deal and Sandwich area and the applicant advises that this is the only possible site for a Children's Centre within this catchment area. The area also required a Children and Adolescent Mental Health Service (CAMHS) facility and this has been integrated into the new Children's Centre as the services complement each other. The Children's Centre section will operate a separate unit from the school with the School having no control over the day to day operation. The staff will control all visitors to the Centre via a secure entrance door.
- 5. The proposal is for a new single storey, flat roof modular building together with two canopies and 5 new car parking spaces, one of which would be a disabled space (see page D1.3). 3 of the car parking spaces would be located in the parking area for Hornbeam Primary School and would be accessed off Great Mongeham Road, whilst the other 1 parking space and 1 disabled space would be located in front of the Children's Centre and would be accessed off Glack Road (see paragraph 10).
- 6. The proposed building would be constructed in sections in a quality controlled factory environment. The parts are transported to the site and fixed on pre-constructed foundations. The unit will be part clad with factory fixed oiled cedar cladding to the corners and the areas in between the sections of cladding, will be smooth render painted in a green colour. The roof would be a metal flat roof and the building has been designed to be no higher than the school buildings. The applicant states that the proposed building would achieve a minimum BREEAM rating of 'good' with desired target of 'very good'. A minimum life-span of 25 years is warranted by the manufacturer, which is also the requirement of the Department for Education and Skills (DfES), which would provide funding for this project.
- 7. Externally there would also be two canopies and an impact absorbent play area. Inside the building, the Children's Centre would contain two large rooms, one for 0-2 and another for 3-5 years old. Attached to the 0-2 year's area would be a nappy changing and food preparation rooms. There would also be a further disabled WC, children's toilets and a laundry. To complement these areas, the unit would have a reception/office and kitchen. The CAMHS facilities will be a medical room, family therapy room, counselling room and a snack kitchen. The Centre's site would be enclosed with 1.8 metre high weld mesh fencing, which would be finished in a green powder coat or metal paint.
- 8. The entry to the Children's Centre would be via an existing gated entrance from Bowser Close, which is used by maintenance vehicles to maintain the school grounds. There is also a gated walkway which exists from the front of the school to the area of the new Children's Centre and this would also be used by staff. The new car parking spaces are only for the use of staff at the Children's Centre and any disabled visitor. No visitors car parking is proposed (apart from the disabled space), as the aim with the other approved Children's Centres is that the majority of the visitors would live in walking distance to the Centre and therefore it is expected that users would walk to the site.
- 9. The expected opening hours are to be 8.00am to 6.00pm, five days a week for 48 weeks of the year. The majority of these hours will be within the existing school

opening hours, including the other activities the school provides. The Children's Centre would employ 4 full time equivalent members of staff with the number of rising for special events. Staff employed within the surrounding area will be expected to walk and any staff required to drive in would be offered parking within the new car park area. The nursery would have a roll of 52 children with 26 attending in the morning and 26 in the afternoon. The visitors to the CAMHS facilities will fluctuate depending on demand. These visitors are likely to be spread out over the 10 hours of operation. Only when a particular event, such as a seminar is being provided, would there be a number of people arriving at one time. However it is unlikely that these events will occur at the same time as the start and end of school and so there would be minimal impact on current traffic levels.

10. The original planning application proposed 7 car parking spaces, which included 1 disabled parking space, in front of the Children's Centre. However from the initial public consultation on the planning application, objection was received from Dover District Council regarding the parking and its close proximity to the private amenity space of No 1 Bowser Close and the potential noise and disturbance it could cause to that property. A revised drawing was prepared which proposed to move all the parking spaces from in front of the Children's Centre, apart from the 1 disabled parking space, to the school car park and extend this car park with an additional 9 parking spaces. However this proposal would have resulted in the removal of a dozen trees, which would have also potentially included two trees classified of moderate guality and value. That proposal was therefore dismissed and the applicant managed to add an additional 3 car parking spaces at the existing school car park which did not affect any of the trees. An additional 1 parking space was added to the 1 disabled parking space in front of the Children's Centre. Due to guidelines on disabled car parking spaces and the distances that disabled people can negotiate, the disabled parking space had to be located in front of the Children's Centre. That was accepted by Dover District Council.

Planning Policy

- 11. The Development Plan Policies summarised below are relevant to the consideration of the application:
- (i) The Kent & Medway Structure Plan 2006:
 - **Policy SP1** Seeks to conserve and enhance Kent's environment and to ensure a sustainable pattern of development.
 - **Policy SS6** Seeks to improve the built and natural environment, functioning and appearance of the suburbs, including the provision of services and facilities that serve local needs.
 - **Policy QL1** Seeks to ensure that all development is well designed and of high quality that responds positively to the local character. Development, which could be detrimental to the built environment, amenity, function or character of the area, will not be permitted.
 - Policy QL12 Provision will be made to accommodate additional requirements for local community services in response to

growth in demand from the community as a whole. The services will be located where they are accessible by walking, cycling and by public transport.

- **Policy EN9** Tree cover and the hedgerow network should be maintained. Additionally they should be enhanced where this would improve the landscape, biodiversity, or link existing woodland habitats.
- **Policy TP3** States that the local planning authority should ensure that development sites are well served by public transport, walking and cycling.
- **Policy TP19** State that development proposals should comply with vehicle parking policies and maximum standards adopted by the County Council.
- **Policy NR1** Proposal for development should incorporate sustainable construction techniques.

(ii) Dover District Council Local Plan 2002

Policy DD1 Requires proposals that are acceptable in terms of layout, siting, scale, architectural style, materials, spatial and visual character of the area, landscaping, privacy and amenity.

Consultations

12. Dover District Council – Raises objection on visual amenity grounds and residential amenity grounds. The development, by virtue of its scale, location and design, would constitute an incongruous and obtrusive feature within the street scene contrary to Policies QL1 of Kent and Medway Structure Plan and DD1 of the Dover District Local Plan. The original application and subsequent amendments do not involve any alterations to the design and appearance of the building. It remains out of keeping with the traditional pitched roof and brick construction of neighbouring buildings and will appear incongruous within the street scene. The separation distance of 1.2m from the footpath does not overcome the concern that the building will be clearly visible and obtrusive within the street scene, particularly given the loss of trees. Additionally the proposed on site parking, by virtue of its close proximity to the private amenity space of 1 Bowser Close would cause noise and disturbance to that property, detrimental to the enjoyment of that property, and contrary to policies QL1 of the Kent and Medway Structure Plan and DD1 of the Dover District Local Plan. From a residential amenity point of view, the reduction in the number of spaces to the front of the proposed building would be beneficial to the potential noise and disturbance caused to 1 Bowser Close. However the amended plans show a dropped kerb from the area marked 'tarmac area' leading to an unmarked piece of land. It is still quite possible for the unmarked piece of land to be used for the parking of cars and/or for the dropping off and turning of vehicles. It is noted that the gates are proposed to be locked, with voice-link to Reception for disabled access. However this would be difficult to enforce and there is insufficient assurance from the plans that the residential amenity of 1 Bowser Close would be improved.

Deal Town Council – consulted on the application on 7 March 2008, 14 August 2008 and 19 November 2008. No comment has been received to date.

Divisional Transportation Manager - raises no objections, as the amount of traffic that the development would generate is likely to be very low.

On the basis of additional parking spaces being supplied on a 1 for 1 basis for the staff of the proposed Children's Centre, the final revised layout in terms of parking and access is now acceptable. Several site visits have been carried out to the roads surrounding the site during a normal school day and it was evident that there is sufficient on street parking available to accommodate the occasional short stay visitor that the healthcare CAMHS aspect of the site would generate.

Whilst there is some concern locally that the road and footways surrounding the site are already busy at the start and end of the school day, and that the proposed development would make this worse. Although there is the potential for a small increase in parents driving to the area, the exact increase in vehicular traffic would be very difficult to quantify at this stage. The fact that the proposed facility is well located in terms of serving a residential catchment area and also being attached to an existing school, it is likely that many users of the proposed Children's Centre are local and/or are already making the journey to the school site with siblings. There is no personal injury crash record for the roads surrounding the school.

On the basis that the centre may also be used for evening meetings etc I would request that a condition is placed on any consent granted ensuring the school car park and linking footpath is kept unlocked and made available for visitors of the centre outside of school hours.

To ensure the site is managed as a whole I would ask that you also include a condition to include the Children's Centre with future revisions of the School's Travel Plan.

Environment Agency – raises no objections.

Local Member(s)

13. The local County Members, Mr Birkett and Mr Eddy, were notified of the application on 7 March 2008, 14 August 2008 and 19 November 2008. Mr Birkett has not commented. However Mr Eddy has objected to this application based on the grounds that it is not located in the right place to serve the proposed catchment area and thus it is not within 'pram pushing distance'; it urbanises this part of the school site; there would be unacceptable loss of trees and the prefabricated structure is inappropriate within a residential area.

Publicity

14. The application was advertised by the posting of a site notice and the notification of 38 neighbouring properties. Neighbours that sent in letters of representations were renotified of subsequent changes to the planning application.

Representations

- 15.25 letters of representation was received in response to the proposal. The main planning reasons for objection can be summarised as follows:
 - Unacceptable increase in traffic as the road is already not suitable for the amount of traffic that is now using the road.
 - Already problems are experienced for a resident living opposite the 'school entrance' in getting in and out of his property.
 - The existing road surface is not suitable for heavy vehicles.
 - The development will increase traffic and fails to provide adequate parking.
 - The development is located at the end of a dead end road and this will cause problems for Emergency Services and deliveries at the start and finish of school/Children's Centre.
 - Wrong location for the Children's Centre.
 - Problems are already experienced of poor parking by parents, by parking across driveways and thus creating a single carriageway road.
 - Walking to the Children's Centre would be minimal and car use would be the main source of getting children to the Children's Centre.
 - The proposed entrance to the Children's Centre is via an already narrow and restricted 'footpath entrance point'.
 - The closure of the South Deal Primary School and subsequent transfer to children to Hornbeam Primary School has increased traffic to the school, and especially in Glack Road.
 - Enforcing of the existing School Keep Clear markings is unsuccessful.
 - The development will increase noise levels.
 - The Children's Centre will be open for 48 weeks of the year as opposed to the school being open for 36 weeks of the year and so it will increase traffic levels for a longer period of time.
 - Concerned over how will parents be encouraged to walk or to use public transport.

Discussion

Introduction

- 16. The Children's Centre Programme is being developed as part of the Central Government's National Sure Start Programme and is funded by the DfES. Kent County Council has been tasked with creating 52 Children's Centres across Kent by March 2008. Having regard to the Kent Primary Strategy, Kent County Council's Children's Centre Team in conjunction with Multi Agency Partners has identified suitable sites within areas of relative deprivation for such services. This proposal represents one of the many Children's Centres planned in Kent.
- 17. The application is required to be determined in accordance with the relevant Development Plan policies, unless other material considerations are of overriding importance. Consideration should be given to the impact of the siting, layout and scale of the development as well as impact on playing fields and highway safety. In addition the design of the proposal and the need for the new community facility should be considered. Policy QL1 of the Kent and Medway Structure Plan and Policy DD1 of the Dover District Local Plan require new developments to be of high quality and well

designed in terms of layout, siting, scale, architectural style, materials, spatial and visual character of the area, landscaping privacy and amenity. Further consideration should be given to the Kent and Medway Structure Plan Policy QL12 that encourages decision makers to make provision for community facilities and to ensure that they are located where they are well served by public transport, walking, cycling and by public transport. In conjunction with these and other relevant policies, these issues are considered and discussed below.

- Siting, design and appearance
 - 18. An objection has been raised by Dover District Council on grounds of detrimental impact on visual amenity. It is claimed that the development, by virtue of its size, scale, location and design would constitute an incongruous and obstructive feature within the street scene and is contrary to Policies QL1 of Kent and Medway Structure Plan and DD1 of Dover District Council. This objection has been put forward to the applicant but the design and location of the Children's Centre has remained the same (albeit the building has moved 1.2m further into the site and is now not located right up to the existing fence). The applicant has stated that there are numerous constraints why any alterations cannot be accommodated and these are namely prohibitive cost, time delay, implications for the provision of play space within the school site, potential need to relocate the existing school play equipment and the issue of maintenance of the play space provision for pupils.
 - 19. The proposal is for a new single storey, flat roof modular building together with two canopies. The parts are transported to the site and fixed on pre-constructed foundations. The unit would be part clad with factory fixed oiled cedar cladding to the corners, and the areas in between the sections of cladding would be smooth render, painted in a green colour. The roof would be a metal flat roof and has been designed to be no higher than the school buildings. Dover District Council has commented that the design of the building is out of keeping with the traditional pitched roof and brick construction of neighbouring residential buildings and would appear incongruous within the street scene.
 - 20. Whilst it would undoubtedly be beneficial to encourage a design solution for the proposed Children's Centre which matches the existing style of the buildings on site, it is not always necessary to replicate the design. In some circumstances an alternative and more appropriate designs would be welcomed. In this particular case, the existing school buildings that are closest to the proposed Children's Centre have a flat roof construction and therefore I do not consider what is proposed would be unacceptable on design grounds. Additionally, whilst it would normally be easier to accommodate new buildings of a permanent construction, as opposed to a modular type construction, this has not been possible with the current wave of Community Children's Centres. Tight budget constraints and the short timescale for project delivery have meant that modular style buildings need to be used for the proposed units.
 - 21. However, I feel that there is scope to explore changing the shape of building from a rectangle to a more square shape and moving the building further away from the fence and into the site and thus retaining the existing trees which are currently proposed to be removed (see paragraphs 24 and 25). Currently at the back of the building there is a 5m strip of land, (where it is proposed to locate the children's covered play area on part of this land), that could be better used. This would also

mean that the potential for having to take more land from the school, and thus affecting the existing play equipment, would be minimal or even non-existent. By retaining the existing trees at the site frontage and thereby providing a visual screening of the building from the road, this would help to overcome objections that the proposed building would be incongruous and obstructive feature within the street scene. I would also recommend that the existing vegetation on the frontage be increased to include an evergreen hedge to ensure a visual screening of the building throughout the whole of the year. Without such an amendment ort something similar, I consider that the proposal has an unacceptable impact on the street scene and immediate locality.

Noise and disturbance

- 22. The currently proposed siting of the building and car park is located to the rear of properties in Bowser Close, which currently backs onto the school playing field. Objections have been raised to the location of the car park, by virtue of its close proximity to rear gardens and the potential noise and disturbance that may be experienced, would conflict with Policies QL1 of the Kent and Medway Structure Plan and DD1 of the Dover District Local Plan. Whilst the removal of 5 of the proposed parking spaces from in front of the Children's Centre has been welcomed by Dover District Council, there is still a concern that there is potential for cars to park unofficially within the area in front of the proposed Children's Centre.
- 23. Whilst the nearest point of the proposed building would be sited 17 metres from the nearest house, the proposed parking area would be 12.5 metres away and within 8 metres of the garden area. The nature of the activities within the proposed Children's Centre would range from a nursery with an outdoor covered play space, a CAHMS facility to discreet parent counselling meetings. There would also be regular visitor and staff movements to and from the Centre throughout the day, which does have the potential to cause some nuisance for neighbouring properties. Since the parking area is only to cater for 2 vehicles, which would involve negligible movements compared to other existing traffic movements in the vicinity, I consider that there would be a minimal disturbance as a result of that element. In respect of pedestrians going to and from the groposed Children's Centre, whilst there would be increased levels of activity through the day in this part of the school site, I do not consider an objection would be warranted on these grounds.

Trees/Landscaping

- 24. Members will note that this application seeks the removal of 7 trees of varying age and species in order to situate the Children's Centre in its proposed location, with the potential to lose a further tree due to its close proximity to the building footprint. One of these trees (a wild cherry) has been identified as needing removal prior to the commencement of any work on site. Dover District Council and Mr Eddy have raised objection to the removal of these 7 (potentially 8) trees, in particular that it opens up the site and would make the proposed building more visible from the road. The applicant has proposed to replace these lost trees but no details of the species or the proposed location have been provided.
- 25. It must be noted that these trees provide a pleasant visual screen from the roadway and residential properties beyond. I consider it unfortunate that the current siting of the building would result in the loss of these trees. Even though the building has been

moved 1.2m further into the site, it is still not far enough away to retain these trees and the visual screen that they provide. The removal of trees is in conflict with Kent and Medway Structure Plan policy EN9 which seeks to encourage trees to be retained on site wherever possible. Whilst the application needs to be considered on the basis of the details submitted, I consider that in order to mitigate the loss of trees and visual screen the building shape could be altered from a rectangle to a square shape and moved further into the north-west corner of the site. I also consider that the existing vegetation on the frontage could be increased to include an evergreen hedge to ensure a visual screening of the building throughout the whole of the year. This would in my view satisfactorily address the conflict with policy EN9. This option has been suggested to the applicant, but they have declined to pursue it.

Traffic and parking

- 26. Another element of the application that requires consideration is the potential for the proposed Children's Centre use to generate additional traffic activity, including movements to and from the site, and whether this would result in an unacceptable impact upon the surrounding area. The Children's Centre would offer a range of health, adult education and family support facilities as well as a nursery facility for 26 children in the morning session and 26 children in the afternoon session. It is also proposed to have a CAMHS facility which would attract visitors throughout the day, usually on an appointment system across the day rather than all arriving at once. Only when a particular event, such as seminar is being provided, would there be people arriving at the same time, but since these events would not occur at the same time as the start and end of school, there would be minimal impact upon the current traffic levels.
- 27. The application proposes a total of 5 new car parking spaces, which includes 1 disabled parking space. Three of the staff parking spaces would be located at the existing school car park, which is be accessed off Great Mongeham Road. The staff would walk to the Children's Centre via the gated walkway, at the side of the school. The staff would be provided with keys to open the padlocks at either end of the gated walkway. The other 2 car parking spaces, which include the disabled parking space, are proposed in front of the Children's Centre and would be accessed off Glack Road. It is proposed that the Children's Centre would employ the equivalent of 4 full time members of staff, with staff living in the local area expected to walk to the site.
- 28. As mentioned previously, the original planning application proposed a total of 7 car parking spaces all in front of the Children's Centre. However due to the objections received from Dover District Council on grounds of its close proximity to the private amenity space of neighbouring properties and the potential noise and disturbance it might cause, a revised drawing was proposed to move all of the parking spaces, apart from the disabled parking space, to the school car park and to extend that car park with an additional 9 parking spaces. However that proposal would have resulted in the removal of a dozen trees, which would have also potentially included two trees classified of moderate quality and value, so that proposal was dismissed, and the applicant proposed to add an additional 3 car parking spaces at the existing school car park which did not affect any of the trees. An additional 1 parking space was added to the 1 disabled parking space in front of the Children's Centre. Due to guidelines on disabled car parking spaces and the distances that disabled people can negotiate, the disabled parking space had to be located in front of the Children's Centre.

- 29. Other than the 4 staff spaces, there is no additional car parking proposed apart from one disabled parking bay. The applicant states that all the Children's Centres in Kent have been strategically located to minimise travel distances for the majority of the residents it is intended to serve, by being located closely within the local communities they serve. The Sure Start scheme puts a great deal of emphasis on 'buggy pushing distances' with the users of the centre being encouraged to walk to them. However, this Children's Centre is expected to serve the Deal and Sandwich area so the catchment area is potentially much further than the 'pram pushing distances' that it states it will serve. This is also one of the concerns that Mr Eddy has about the proposed location of the Children's Centre. However, should the Centre also be intended to serve families from Sandwich, then I would regard this location on the outskirts of Deal and just off the road to Sandwich to be a logical one, if there is no option of providing an additional Centre in Sandwich itself.
- 30. A significant number of letters of representation have been received from local residents living in Glack Road and Bowser Close. Both these roads are cul-de-sacs (with Bowser Close being located off Glack Road) and currently experience traffic and parking problems by parents of Hornbeam Primary School, who park in both of these roads and then use the gated walkway to gain access to the school. The main pedestrian and vehicular access to the school is via Great Mongeham Road. The local residents claim that the roads are unsuitable for the amount of traffic that already use these roads and that it is unacceptable to allow any further increase in traffic. However the applicant has stated that it is unlikely that the Children's Centre would lead to an increase in traffic at the start and finish of school time as parents would largely be walking to the site and be arriving at different times from the school times, as the Children's Centre would operate different hours to the school.
- 31. Kent Highways Services has raised no highway objections to this proposal as the amount of traffic that the Children's Centre would generate is likely to be low, compared to all other traffic movements generated in the locality (e.g. by the school and neighbouring housing). Whilst I accept that there will be some inconvenience from existing traffic congestion in this locality, which is typical of all neighbourhoods which include a primary school, I do not consider that there is enough evidence to recommend a refusal based on highway grounds. From a policy point of view, it is considered that the proposal meets the requirements of Policies TP3 and QL12, which require that such community facilities should be grouped together to reduce the need to travel.

Conclusion

- 32. Having regard to the Development Plan Policies, in addition to material considerations raised by respondents, I consider that the creation of the Children's Centre, plus the associated car parking and the loss of trees, unduly conflicts with the relevant Development Plan Policies. Whilst I also acknowledge there might be some potential for an increase in vehicle movements arising from the additional facility in the area, it is unlikely to be so significant to also recommend a refusal on highway grounds.
- 33. The proposed location of the building would result in the removal of the existing trees, which currently provide a pleasant visual screening of the site and which would otherwise ensure that the proposed Children's Centre would not create an incongruous and obtrusive feature within the street scene. The loss of trees could be

overcome by the suggested re-positioning and reconfiguration of the building, but the applicants have declined to pursue this option.

34. Whilst the building is of modular construction and out of keeping with the traditional pitched roof and brick construction of neighbouring properties, I consider that the design would be acceptable if the existing trees were to remain in place and additional evergreen hedging is added, to reduce its impact on the street scene and to further shield the building from the neighbouring properties. I therefore recommend accordingly.

Recommendation

35. I RECOMMEND that PERMISSION BE REFUSED ON THE FOLLOWING GROUNDS

- i) The development is contrary to Policy QL1 of the Kent and Medway Structure Plan and Policy DD1 of the Dover District Local Plan in relation to inappropriate siting and consequential loss of trees and impact upon visual amenity and the street scene.
- ii) The development is contrary to Policy EN9 of the Kent and Medway Structure Plan in relation to loss of trees.

Case officer – Lidia Cook

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Background documents - See section heading