



PLANNING
CONSULTANCY

Planning Statement

Proposed Conversion of existing building to a mix of 31 apartments and erection of 43 two and three storey dwellings to the rear with associated parking and landscaping.

Cheriton Parc, Cheriton High Street, Folkestone, Kent, CT8 8AN

Prepared on behalf of MJH Cheriton Parc Ltd
By Hume Planning Consultancy Ltd
Dated June 2022

Contents

1. Introduction	3
2. Site and Its Location	3
3. Proposed Development	4
4. Relevant Planning History and Designations	5
5. Design Considerations	6
6. Assessment of Environmental Impacts	7
7. Planning Assessment of Residential and Employment Balance	10
8. Summary	13

1 Introduction

- 1.1 This detailed planning application follows pre-application engagement with Folkestone and Hythe Council (LPA) and Kent County Council (Highway Authority).
- 1.2 The application plan package and this Planning Statement should also be read in conjunction with the following comments which are cross referenced in this statement.
 - Supporting Design and Access Statement prepared by Holloway Architects.
 - The Landscape Report and explanation of landscape strategy prepared by EDLA Ltd.
 - Preliminary Ecological Appraisal prepared by Bakerwell Associates (it is relevant that the necessary identified surveys within this report are now completed).
 - Noise Report prepared by MRL Acoustics.
 - Air Quality Assessment prepared by ENTRAN.
 - FRA/Preliminary SUDS Report prepared by Adkins Consultants Ltd.
 - A Land Contamination Assessment (Phase 1) prepared by Ecologia.
- 1.3 This Statement considers the main planning issues and seeks to justify the proposal having regard to the planning policy context and the need for housing in the district.

2 Site and its Location

- 2.1 The application site fronts Cheriton High Street and comprises a 3-storey height office building with hardstanding occupying a large proportion of the 1.12 hectare site. The site was originally constructed as an office building for the Channel Tunnel and is situated close to the main terminal.
- 2.2 The site is bounded to the north (beyond the High Street) by the M20 motorway and tree and hedgerow landscaping on the motorway embankment. To the south again, beyond a landscaped embankment, the site is bounded by a railway line (which is in cutting to a depth of between 6-8m).
- 2.3 The site is visually enclosed to either side by the 4-storey (100 bed) Holiday Inn Express Hotel (on the west side) and to the east by a residential development on the former Brockman Family Centre (27 number dwellings). This permission on a former employment site included a mix of three storey apartments and two storey dwellings with pitched roofs.
- 2.4 The wider area comprises mainly residential although beyond the Holiday Inn Express building, lies the Motis Business Centre. The Tesco superstore and petrol station is located to the northeast of the site, beyond the residential dwellings served off Horn Street.

3 Proposed Development

3.1 The proposal comprises two components;

- 1) **Conversion.** The conversion of the existing frontage building known as Cheriton Parc House to 31 apartments (25 x 2 bed and 6 x 1-bedroom units). The converted apartments will each have a balcony area and will be set within landscaped grounds. There is also a communal roof terrace on the third floor. These apartments will have a separate dedicated vehicular access and 35 parking spaces are proposed.
- 2) **New Build.** To the south of the main Cheriton Parc House on the existing hardstanding and incidental planting areas, it is proposed to erect 43 dwellings (26 x 3-bedroom dwellings) all of which will be two storey and a further 17 x 4-bedroom dwellings (comprising 40% of the total which will be 3-storey). The dwellings will be arranged around a central landscaped area (shown on the plan extract below) and are positioned adjacent to the hotel, the railway line and adjoining open space in the southeast corner of the site.



Plan showing three storey height dwellings (shaded red)

3.2 There are 5 parking courts to serve the residential dwellings to reduce the visual influence of car parking on the layout and particularly the central open space, which was an observation of the LPA at the pre-application stage of engagement. For these design reasons in places, a tandem arrangement to on plot parking has been adopted.

This layout approach is considered to be justified in design terms given the site specific circumstances of this site, particularly the distance of the dwellings from the High Street and fact that this parking arrangement is unlikely to result in car parking pressure on the existing adopted highways in the vicinity of the site.

- 3.3 For the new build dwellinghouses, a total of 52 parking spaces are provided on plot (via a tandem parking arrangement). An additional 42 car parking spaces are provided in the 5 parking courts. In addition, a total of 4 further visitor spaces are provided, making a total of 98 parking spaces for 43 dwellings (a standard of provision that is in excess of 2 spaces for each dwellinghouse).
- 3.4 A refuse storage collection point for the converted apartments is identified at Page 18 of the DAS. The internal road layout was tracked for refuse vehicles and complies with the required carry distances. This is shown at page 19 of the accompanying DAS.
- 3.5 The proposed materials are shown at pages 24 and 25 of the DAS. The hard and soft landscaping is shown upon landscaping plan EDLA CHP-EDL-XX DRL 2000. An emergency access is shown between the Cheriton Parc House conversion and the proposed new build development. This access has retractable bollards.
- 3.6 A new 60m footway is proposed beyond the eastern site access which will create a direct connection from the application site to the existing High Street footpath. An informal crossing facility with dropped kerbs and tactile paving, is also proposed to provide a connection to the north side of the High Street. These offsite works within the adopted highway are shown on Drawing No 21-113-002 Rev A.

4 Relevant Planning History and Designations

- 4.1 The Brockman Family Centre adjoining the western boundary of the site (LPA Ref Y/19/1164/FH) comprises 27 dwellings (3-storey apartment block and 2-storey dwellings) and was approved on a former employment site following reallocation to residential under Policy UA9 of the Places and People adopted Local Plan.
 - LPA Ref Y/21/1455/FH/PA Prior Approval for office to residential.
 - LPA Ref Y/20/2085– Motis in part, the application related to the change of use of an employment site to a 115 space lorry park. This application was resolved to be approved.
- 4.2 The application site is designated within the settlement confines where adopted spatial policies Policy S1 and S3 are applicable. The site is designated as an Employment Area where Policy S4 applies, this is addressed in the planning policy section of this Statement.
- 4.3 The site was subject to pre-application engagement with LPA officers (LPA Ref 21/1455/FH/PA) in line with best practice. The LPA's feedback and how this has been responded to in the final submission, is set out at page 13 of the DAS and is not repeated here.

5 Design Considerations

- 5.1 This Planning Statement relies on the supporting Design and Access Statement (Holloways) and Landscape Strategy Report (EDLA) to convey how architecturally, the proposed scheme is of a high quality and the layout has been influenced by the landscape strategy and positively responds to the constraints and opportunities identified.
- 5.2 Both documents explain the screening effect of the 4-storey height Cheriton Parc House building which is closest to the High Street, the Holiday Inn Express building and the relationship to the adjoining residential development, which is currently under consideration (the former Brockman Family Centre).
- 5.3 Building Heights, which for the new buildings comprise 60% x 2-storey height with 40% (or 17) comprising 3-storey town houses, are justified at Pages 24-26 of the accompanying DAS.
- 5.4 Because of the relationship of the site to surrounding properties, in planning terms the site is visually contained by existing development. The height of the 3 storey dwellings within the proposed development site has been carefully considered and the approved residential layout to the east of the site has also influenced the design choices.
- 5.5 Technical issues including parking levels and the potential influences of noise from the surrounding roads and railway (southern boundary), air quality and surface water drainage have helped to shape the proposals as well as the physical constraints of the pylons close to the southern boundary of the site.
- 5.6 Pages 9 and 10 of the DAS document go in to greater detail to explain the proposed materials after a further assessment of the local character of the area.
- 5.7 It is considered that although this site was a purpose-built office block whose locational position was originally dictated by its proximity to the Eurotunnel entrance, the area to the south and east is predominantly residential in character and these areas comprise mainly 2-storey height development. The height and comparative section drawings are provided at pages 25 and 26 of the DAS.
- 5.8 A key landscaping objective of the proposal was to create a high quality and cohesive residential development with large areas of well-designed green infrastructure. Key features as set out in the landscape strategy include;
 - Retention of the mainly perimeter landscaping and hedgerow that already exists as a building block of an improved future landscape framework for the site, in place of the existing hardstanding. An existing landscaped framework that will be reinforced and particularly focused adjacent to the railway line.
 - A central island of open space around which the new residential development is arranged.
 - The opportunity for recreational play space to be created that is accessible, particularly for the family accommodation that is proposed. The LEAP design outlined within the Landscape Report is based on a 'natural play' design and will

become an important social meeting place. In the connect zone (eastern portion), with the west side comprising more of a recreational play zone incorporating;

- Stepping stones
- Seating
- Jumping disks
- Play feature and sand pit.

These features are best shown at page 26 of the Landscape Report.

- A detailed landscaping scheme that responds to key views within the site.

- 5.9 The Landscape Report details the six main landscape character area subsets within the site. Generally, landscaping will be focused in key areas of the site with a mixed wildflower and herbaceous underplanting of native and retained trees. Strong formal street trees are also proposed again with herbaceous underplanting.
- 5.10 The Landscape Strategy Report also explains how the open space is quantified and meets local plan policy standards with;
- 0.04ha semi nature greenspace;
 - 0.18ha local green space (The Central Green).
- 5.11 Hard landscaping within the site with bands of concrete setts which also slow traffic speeds and promotes safety, are provided between the front entrances of each perimeter house and the central open space when crossing the road, loop to the perimeter of the open space.
- 5.12 Street furniture and paving is recognised as an important benchmark of quality and details of this provision are also set out at pages 32. This detail includes the lighting strategy to complement the landscaping as set out at page 36. The Landscape Report also sets out the framework by which a biodiversity net gain is proposed to be achieved.

6 Assessment of Environmental Impacts

Sustainability and Energy

- 6.1 The layout has been designed to take account of solar gain (see page 5 of the DAS).
- 6.2 A fabric first approach to design has been adopted with a modular construction. This choice alone will lead to a shorter construction period on site and less traffic movements during construction, alongside reduced waste and larger sized deliveries straight to site.
- 6.3 More efficient fabric insulation with resultant reduced lighting and energy bills.

- 6.4 The incorporation of EV charging points with;
- 1 active charging point per dwelling for on plot parking and
 - a minimum of 2 visitor spaces provided with passive charging spaces.

Flood Risk and Surface Water Management

- 6.5 The supporting Adkins Report confirms that the site lies within Flood Risk Zone 1 i.e., a less than 1 in 1000 annual probability of river or sea flooding. The proposed SUDS system combines a mixture of infiltration, rainwater harvesting, a detention basin to which flows will be controlled by a hydro brake and via swales the natural flow path of the site will be connected to the detention basin.

Transport Statement (TS)

- 6.6 The accessibility of the application site to local services and facilities is set out at Page 8 of the Supporting Transport Statement which also provides walking and cycling times to food stores, health and educational facilities nearby. It is identified that the cycleway and footpath network in the locality is well connected, although there is no direct footway to the application site itself and the nearest bus stop is 300m away on Cheriton High Street from where Stagecoach operate a high frequency service (see page 11 of the accompanying TS). The application site also lies within 2.7km of Folkestone west station and 3.7km from Folkestone Central.
- 6.7 The TS assesses the accident record in the High Street and concludes that recent signalisation at the junction of Cheriton Approach will be likely to reduce accident numbers in the future at this end of the High Street.
- 6.8 The forecast trip generation using TRICS database equates to an additional 17 each way trips in the morning peak (8am – 9am) and 28 each way movements in the pm peak (5pm - 6pm). The TS concludes that this represents a minimal and non-severe impact on the local traffic network. Page 19 of the TS identifies the general trip distribution which is spread across the local roads with 33% of movements to M20 west and 30% routing via Horn Street and 30% via the B2064. As a result of the low trip generation and this predicted distribution, it is concluded that local junctions will experience minimal impacts from the residential proposal.
- 6.9 Access to the site will be enhanced through the provision of the footpath and crossing point improvements that will be delivered by this proposal.

Air Quality

- 6.10 The application site is not within an Air Quality Management Area (AQMA). The proposal has been assessed using the accepted Kent and Medway Partnership Planning Guidance methodology with existing air quality data being reviewed before then reviewing traffic flow data generated by the development and also during the construction phase.

- 6.11 The mitigation measures set out at paragraph 6.7 of the accompanying Air Quality report will ensure that the cost of implementing the mitigation will exceed the calculated Damage Cost figure of £14,579.
- 6.12 The report concludes that limited releases of dust and particulate matter are likely to be generated by the development and through good site practice and implementation of suitable mitigation measures, the resultant impacts are considered to be negligible. Overall, it is concluded that air quality does not pose a constraint to the proposed development either during construction or once operational.

Noise

- 6.13 The noise assessment of the impact of the rail line on residential development noted that a maximum of 4 trains passed the site per hour and the rail track was in a deep cutting some 6-8m deep. The trains were also noted to be travelling at low speed due to the proximity of Folkestone West station.
- 6.14 A noise monitoring recording position was set up at a point representing the rear façade of the nearest dwellings to the rail line. The survey results found that relevant WHO guideline and Pro P6 guidance standards could be met for the proposed dwellings even with the windows left open. The general outdoor noise climate within the rear gardens nearest to the rail line were also found to be well above the upper external daytime noise limit of 55 db LA eq outlined in both the BS8233 and the WHO Guidelines.
- 6.15 The accompanying Noise Report concluded that no noise mitigation measures were required for the new dwellings to meet the required internal and external criteria and on this basis the early layout designs were not reshaped as a result of the noise assessment.

Ecology

- 6.16 The proposed scheme is supported by a Preliminary Ecological Assessment (PEA) which identifies the broad habitats at and in the vicinity of the application site. These habitats are set out at paragraph 5.9 of the PEA (pages 12-13). The existence of buildings, large areas of hardstanding and smaller areas of improved grassland and introduced scrub, led to the report concluding the site was of low ecological importance.
- 6.17 The proposal includes Tree Protection Measures and reinforcing of existing trees and hedgerow boundaries including the Bee Orchids which will be partially translocated on site. Measures for the benefit of bats to be incorporated into the design will be secured by planning condition. Recently planted trees on site are also proposed to be relocated between October and March. The layout will retain the broad-leaved woodland in the southeast corner of the site.
- 6.18 The PEA recommends a presence/likely absence survey for reptiles which has been undertaken during April, May and June of this year. The survey findings will be confirmed shortly together with any additional onsite mitigation, but findings to date suggest that this record will not affect the submitted layout. The Ecological Report proposes that areas of enhanced native species, rich wildflower meadow and grassland are incorporated in the landscape proposals. Bat, bird bricks and boxes and wood

habitat piles are also proposed together with hedgerow highways which the report collectively concludes will result in a biodiversity net gain.

- 6.19 The ecological report concludes that the majority of habitats that do exist beyond the large expanse of buildings and hardstanding's are common and widespread. The Ecological Report concludes that the scheme proposals offer the opportunity to enhance the site for biodiversity in line with Section 15 of the NPPF.

7 Planning Assessment of Residential and Employment Balance

- 7.1 The main four storey building known as "Cheriton Parc House", which was a purpose built office building, has been vacant for over 2 years. The reasons for this are explained below. The Folkestone and Hythe Places and Policies adopted Local Plan (2020), allocated Cheriton Parc under Policy E1 (new employment allocation) for protection of business uses for use classes; B1 (business), B2 (general industrial) and B8 (storage and distribution).

- 7.2 Policy E2 (existing Employment Sites) seeks to protect sites for business purposes under Classes B1 and B8. Policy E2 states that where proposals seek to fully or partially redevelop existing employment sites for alternative uses, this will be permissible subject to the following criteria:

- 1) The existing or former employment use is no longer appropriate in terms of neighbouring uses or impacts on the natural environment; or
- 2) The site or premises has been the subject of sustained marketing over a 12-month period prior to the submission of the planning application but the site or premises has remained unsold for all appropriate B class employment use and no reasonable offers have been received;
- 3) It does not prevent or limit opportunities for any remaining land left undeveloped coming forward for employment purposes;
- 4) Any established business is relocated to appropriate alternative premises within the local area; and
- 5) The site is unviable for redevelopment for an alternative employment use.

- 7.3 Firstly, in terms of the neighbouring uses (criterion 3), the application site lies adjacent to a recently developed residential development, itself upon a former employment site (known as the Brockman Family Centre) and a residential use would safeguard the residential living conditions of these occupiers to a greater degree than the former office use. On the western site, the proposed residential conversion and redevelopment lies adjacent to a four storey 100 bedroom Holiday Inn Express building. Again, a residential use upon the application site would be more compatible with this neighbouring use, compared with its former office use and would enhance the environment of the hotel.

- 7.4 The application site sandwiched between the hotel and recent residential dwellings is physically separate to the main Motis Business Centre, a site where Members of the Planning Committee recently supported the loss of employment land (Planning Committee dated January 2022), despite also being safeguarded by employment policies of the plan.
- 7.5 It is relevant that the application site was not promoted through the local plan process. The adjoining Brockman Family Centre (a former KCC Office and employment site), was re-allocated for residential purposes (Policy UA9) through this purpose. The LPA's policy making reasoning behind this specific allocation outlined its sustainable location, also pointing out that it had nearby 'employment opportunities at Cheriton Parc.' Although the importance of the development plan is recognised as a starting point for decision making, it is relevant that in this case, were the application site to have been promoted (like the neighbouring Brockman site), it is likely that it would have been allocated for housing rather than being safeguarded for employment because of its last use as offices. Finally, the planning system encourages consistency of decision making and it is relevant that the redevelopment of the Brockman site (a former KCC office) LPA Ref Y19/1164/FH, was approved on the 10th December 2020. This approval accepted that the site locationally, was sustainable and importantly, the loss of an office building for residential use.
- 7.6 The application site (Saga building) is a bespoke office that was previously constructed specifically by Eurotunnel and provides office space within a high-quality designed building. This nationally significant infrastructure project was a locational reason (proximity to the Channel Tunnel gateway itself) for constructing this amount of office floorspace in this location, rather than within a town centre location. Whilst over more recent years, Saga, because of their size, were able to occupy the offices. The size of the floorspace, internal layout configuration, extensive parking and overall size of the site combined with its location that is distant from the town centre (although accessible to the motorway), are factors that in combination have precluded employment interest in the building. All of these factors were accentuated by the impact of Covid and the change in working patterns with more "hot desking" being practiced and greater levels of home working. Where office floorspace is justified in the future by businesses, occupiers are likely to select town centre locations where there is greater activity and office use can support other town centre retail and leisure uses. Many LPA's including Maidstone BC, through spatial policy making, are encouraging town centre office uses for the above reasons in their emerging local plans.
- 7.7 Functionally, because of the bespoke layout and quality of the office building use, the internal layout (as a showpiece HQ building for Eurotunnel), the internal floorspace of the existing building itself is not easily convertible to other main employment uses. From a viability perspective, it is unlikely that the existing office building could be demolished and redeveloped for light or heavier manufacturing. The proposed housing for which there is a recognised need by contrast, will result in a conversion and long term use being secured. (this is consistent with Policy E2 criterion 5).

- 7.8 Notwithstanding the above, Cheriton Parc House enjoys a class E use and therefore could switch to other uses not associated with employment generating uses, such as retail, leisure or restaurant etc, all of which weaken the significance of the E1/E2 policy in assessing alternative uses despite the fact that the development plan is “uptodate”. It is also relevant that a permitted retail conversion could have a much more harmful impact on the town centre. The proposed housing would generate a number of construction jobs and opportunities through the general management of the rented affordable accommodation by the RSL partner as well as jobs created via the maintenance of the parking, grounds and building itself in the future.
- 7.9 The Saga building has been vacant since the pandemic (March 2020). Marketing agents can confirm there was no interest from office users during this period. The proposed residential conversion offers the ability to promote investment in the building and arrest deterioration, securing a long-term use for the building. SAGA have in the past, occupied a significant volume of office space at Bouverie House, Middleburg Square and until 2020 the application site (Cheriton Parc House). The Employment Land Review Study prepared for the LPA acknowledged that the disposal of these buildings have ‘flooded the market with a large quantity of office space.’
- 7.10 It is also relevant that the residential conversion will be environmentally sensitive and reduce energy consumption and upgrade insulation which is consistent with criterion 2 of Policy E2. The building has now been vacant for over two years which is not a sustainable use of land resources.
- 7.11 Whilst it is accepted that employment (pre COVID) safeguarding policies (in this case for office space) are clearly set out in the development plan, the reduced demand is a material consideration, but this also has to be balanced against the need for residential accommodation and it is common ground that the LPA cannot demonstrate a 5 year housing land supply which as a result activates the “tilted balance” . The Planning Committee Members guidance on the weighting to this policy when recently considering the Motis Business Centre lorry park, is also relevant to this weighting assessment.
- 7.12 It is also relevant that other policies of the development plan strongly promote residential supply and delivery of housing on brownfield sites on what is accepted by the LPA as a sustainable location, including the delivery of a policy compliant affordable housing scheme.

8 Summary

- 8.1 It has been shown that the constraints and opportunities of this site have been carefully considered and the necessary technical reports support this submission.
- 8.2 The supporting DAS and Landscape Strategy Report explain that whilst the site is visually enclosed, the scheme design is of a high quality and the layout has been landscape led. It is concluded that a good quality living environment will be created for future residential occupiers in line with development plan policy.
- 8.3 The application site is a brownfield site in a sustainable location and the proposal will allow the residential conversion of the building rather than its demolition and redevelopment for alternative employment uses to fit more neatly with the E1 and E2 policies. The option of redevelopment would not be economically viable given the existing use value of the Saga building.
- 8.4 It has been explained that the principle of the loss of this vacant office floorspace can be justified in policy terms, despite the development plan being fairly recently adopted, for the reasons outlined in Section 7 of this Planning Statement. This position is reinforced in combination with the 5 year land supply position which triggers the tilted balance in favour of the applicant and the recent Motis decision by Members of the Planning Committee, which provided a clear steer on the weighting to be afforded to the employment safeguarding policies in close proximity to the application site.
- 8.5 For these reasons, it is respectfully requested that this proposal, which will deliver much needed and well designed housing in a sustainable location, is supported.