

Heritage Statement

Site: 11 Church Street, Folkestone

Proposal: Conversion to 10 Self Contained Flats



Prepared by C Alexander BA, Dip UD, MRTPI, IHBC

November 2017

Heritage Statement

Site: 11 Church Street, Folkestone

Proposal: Conversion to 10 Self Contained Flats

1 Introduction

This report will identify the site and its location; any relevant heritage assets in and around the site; and then evaluate the impact of the proposals on the significance of those heritage assets, taking into account the relevant legislation, policy background and guidance documents. (Note, it does not address any below ground archaeology issues).

2 Process and Planning History

The design of the current scheme has been an iterative process over several months, which has been informed by the constraints and opportunities of the site, and feedback given by the Council during pre-application discussions, which is given in full in appendices A and B.

It is worth noting that the feed-back given Appendix A states that 'Generally the sketch scheme shows a very sensible understanding of the basic layout of the buildings ensuring that alterations are kept to a minimum'.

Following the submission of amended drawings further comments were subsequently received, given in Appendix B, which states that 'Generally, all the changes represent improvements to the layout which make the conversion scheme even more responsive to the original layout of the buildings. The flat layouts work well, in particular the loss of the infill porch (Flat 3) and the demolition of the modern extension to the side of Flat 5 and rearrangements to give this flat a private courtyard, are welcomed improvements'.

3 Site and Location

The site is located within the historic core of Folkestone, on high ground, to the west of the harbour, fronting Church Street. It faces a triangular piece of open space, which forms the church yard of St Mary and St Eanswythe's Church, which lies to the south of the site. The building is Grade 2 listed and forms part of a cluster of buildings of high townscape value, which is part of the Folkestone Leas and Bayle Conservation Area (see Fig: 1).



Figure 1

It is a large irregular shaped site, which was formerly used as Council Offices, with a large rear garden, laid out as a car park. The building has been vacant for approximately 6 years, and is now in a very poor state of repair, having been vandalised.

Number 11 Church Street forms part of a larger building, including 11A Church Street, which was a later addition, and was all in the same use, however 11A does not form part of this application.

4 Relevant Heritage Policy and Guidance

Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that special regard shall be given to the desirability of preserving listed buildings or their settings or any features of special architectural or historic interest which they possess. Section 66(1) similarly requires that when considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting. Section 72(1) of the same Act requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of conservation areas. Case law has established that the duties described should be given considerable importance and weight.

Section 12 of the National Planning Policy Framework 2012 (NPPF), sets out Government policy for conserving and enhancing the historic environment. This highlights the need to conserve heritage assets 'in a manner appropriate to their significance'. Paragraphs 131 to 134 set out a framework for considering the impact of proposals on the significance of heritage assets.

The National planning practice Guide 2014, gives more detailed guidance on conserving and enhancing the historic environment. This reinforces advice given in the NPPF, and states that 'The conservation of heritage assets in a manner appropriate to their significance is a core planning principle. Heritage assets are an irreplaceable resource and effective conservation delivers wider social, cultural, economic and environmental benefits'.

Further national guidance is provided by Historic England in 'Making Changes to Heritage Assets' February 2016. This provides more detailed guidance on alterations to heritage assets, the aim of which is to 'recognise and reinforce the historic significance of places, while accommodating the change necessary to ensure that people can continue to use and enjoy them'.

At the time of writing the local plan comprises a number of documents, including the Core Strategy 2013, saved policies of the 2006 Local Plan Review, and the emerging Places and Policies Local Plan 2016.

Of particular note, in the 2013 Core Strategy is Policy SS3 which states that:

‘Proposals should be designed to contribute to local place-shaping and sustainable development by:

i) respecting and enhancing key historic features of conservation interest’.

The saved Policies in the 2006 Local Plan Review includes two particularly relevant policies, which are BE4 and BE5. The former essentially seeks to protect the character of conservation areas, whilst the latter seeks to protect the character and setting of listed buildings, which echo national legislation and guidance.

The emerging Places and Policies Local Plan 2016 has a specific section on the historic environment, and Policy HE1 is directly relevant to this application, and states that,

‘The District Council will grant permission for proposals which promote an appropriate and viable use of heritage assets, consistent with their protection and conservation, particularly where these bring redundant or under-used buildings and areas back into use or improve public accessibility to the asset’.

5 Heritage Assets and their Significance

The proposals would have an impact, to a greater or lesser extent on a number of designated heritage assets, these are;

11 Church street, which is Grade 2 listed, and the Folkestone Leas and Bayle Conservation Area.

There are no scheduled monuments or any other recorded historic features on the site.

The NPPF defines significance as ‘the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from the heritage asset’s physical presence, but also from its setting’. Setting is defined in the NPPF as follows:

‘The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.’

Significance of 11 Church Street

11 Church Street is Grade 2 listed and its list description is as follows;

‘At one time Municipal Offices. Late C18 to early C19. Two storeys red brick with grey headers on a stone base. Original portion of three windows. Portion, also of three windows, added at the north end. Brick eaves cornice. Sashes with verticals only and two light sashes to the earlier portion. Door-case with pilasters and fanlight and six panelled moulded door

with narrow lights on either side of it. Good staircase with two turned balusters to each tread and scrolled tread ends’.

The building has been extended and altered extensively throughout its history, and many of those alterations are detrimental to the character and significance of the building. The original C18th building, is of red brick construction on a stone plinth, with brick eaves cornice, under a Kent peg tile roof, and this is by far the most significant part of the building from an historic building and architectural point of view (see Fig: 1). There is clear evidence that all the window openings to the front have been altered (see Fig: 2), probably in the Victorian period, with there being no ‘queen closers’ to any of the openings. The windows themselves are of Victorian design. The door and its surround are also a later modification (see Fig: 3). Internally, whilst the stairs have been retained, they have been severely vandalised (see Fig 4). Fortunately some of the original balusters remain. The original plan form has been extensively modified, with many rooms being sub-divided, with little sympathy to the character of the building (see Fig 5). There are later Victorian and C20 extensions to the rear, the latter with flat roofs (see Fig: 6).



Figure 2



Figure 3

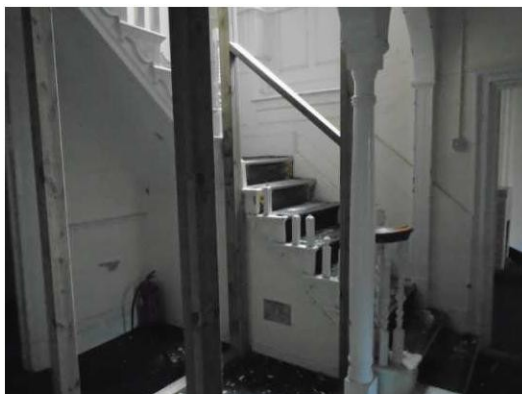


Figure 4

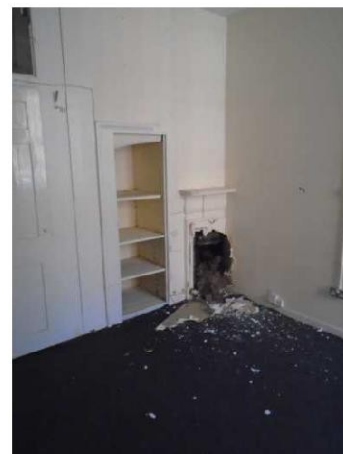


Figure 5

The original house was extended to the north in the late C19. This was originally a single storey extension, but was later given a first floor as evidenced by the change in brickwork. The windows are Victorian in style, with exposed lintels and projecting stone cills (see Fig: 7).

The building was subsequently extended again, to the north in the early C20, by connecting the building at first floor level to 11A Church Street. (Whilst 11A does not form part of this application it is mentioned here for completeness). This connection is set well back from the front elevation, and retains vehicular access to the rear (see Fig: 6). 11A Church Street would appear to be of early C20th origin, as evidenced by its ground floor front elevation, with Flemish bond brickwork, but it has again been extended at first floor level, probably post WW1, with the latter being in stretcher bond. It is of red brick construction under a flat roof. The door is to the left hand side, with two sash windows to the right. At first floor it has three blank recesses. This part of the structure is of little historic or architectural value, and is only listed by virtue of its physical connection to the original range.



Figure 6

To the south lies a four storey range, one bay wide, of red brick construction under a Kent peg tile roof, with a gable facing the street. It is of mid C19th construction, with sash windows to each floor. Again it has been much altered, but nonetheless it is of some historical and architectural significance.

In summary, it is a complex range of buildings; the original C18th range remains the most important part of the building, however the various C19 extensions are also of some historical and architectural merit. Many of the internal sub-division of rooms detract from the character and significance of the building. Most of the later C20th extensions and alterations are of no historic or architectural importance, and some of them detract from the special character of the building.



Figure 7

Significance of the Folkestone Leas and Bayle Conservation Area

The Folkestone Leas and Bayle Conservation Area is very large and encompasses a variety of character areas, which is acknowledged by the Folkestone Conservation Area Appraisal. The site, the subject of these planning and listed building applications falls within Folkestone Old Town (character area 4) which covers the historic core of the town. The appraisal identifies the Old High Street/Bayle/Church Street as a distinct character area, which has a picturesque, village-like quality (see Figs: 8, 9 & 10).



Figure 9



Figure 8

The Old Town is characterised by its hilly and winding topography, with the remains of a medieval street pattern. The following qualities underpin its significance;

- A high density of buildings, generally two or three storeys high.
- Narrow plot widths, with back of pavement development
- Tight street enclosure, which opens out to the large green open space fronting St Marys St Eanswythe's Church.
- A complete variety of building types, ages and architectural styles, and it is this variety which is an important part of the areas special character.
- A large number of historic buildings, several of which are listed.
- A mix of land-uses, but predominantly residential and commercial.
- Confined, and constantly changing views with occasional glimpses between buildings to open spaces, landmarks or the sea beyond.
- A complete mixture of traditional building materials, but predominantly, brick, stucco or stone elevations, under Kent peg tile or slate roofs, with timber fenestration and doors.
- Buildings generally located at the back of the pavement with no front gardens.



Figure 10

6 Details of the Proposals and their Impact on the Significance of the Heritage Assets.

Proposals

It is proposed to convert 11 Church Street, into 10 self contained flats, with rear parking with one space per flat.

Internally the proposals seek to work, where possible, with the original grain of the house. This involves the removal of many of the modern partitions, which sub-divide the original spaces in order to make smaller rooms. This is particularly the case in the original C18th part of the building. Where original fire places exist, these will be retained and exposed, and details of these are included in the submissions. All historic cornices will be retained, and exposed where possible, details are given on the submitted plans.

There is a wide range of windows on the building, some original, but not many; most are of traditional timber construction, but there are some uPVC windows to the rear of the building. These are rather crude replacements and currently detract from the character of the building. Where these are present they will be replaced with timber windows, of varying designs as detailed on the elevational drawings, and this will represent a substantial improvement to the character of the building. Existing timber windows will be retained and repaired as necessary.

Fire and sound insulation requirements will be discreetly provided between the floor joists and existing historic floor boards would be re-laid in their original positions. No historic ceilings would be damaged or removed in order comply with fire and sound reduction requirements. A typical detail of these proposals is included on the submission drawings.

All historic doors will be retained, see door schedule submitted as part of the application. Doors will be upgraded with Envirograf paint system and smoke seals fitted in order to achieve either 30 minute or 60 minute fire resistance as required.

Externally, there would be several minor alterations, and these include;

Demolition of a small flat roof extension to the rear of the four storey extension and to the south of the original C18th range, (adjacent to the Primary School),

Replacement of uPVC windows with timber windows of varying sizes and designs,

Replacement of a modern door with French doors within the bay of the rear Victorian extension,

Insertion of three, four panelled timber doors to the rear of the building,

Replacement of timber shutters to the front of the C18th range, (note the original gudgeon pins for the shutters remain in place),

Provision of 1.8m rear garden walls and gates in order to provide private amenity space for three of the ground floor flats.

Impact on the Significance of Heritage Assets

The proposals work with the historic grain of the building, and where possible reinstate original rooms, spaces and historic features. This will entail the removal of several modern partitions which currently detract from the character of the building and would better reveal the importance of the building.

There would be minimal loss of any historic fabric.

All the original historic doors and windows would be retained, and where necessary repaired using traditional materials and techniques. All those features which are truly significant would be retained.

The replacement of uPVC windows on the rear elevations, with traditional timber windows would be a significant improvement over the existing situation.

Many historic features, such as fireplaces would be revealed.

The provision of the garden walls would help to separate the building from the existing car park and thus improve its setting.

The remains of what was originally a very impressive staircase would be repaired and reinstated.

The proposals would not only improve the character and appearance of the building, but also its contribution to the special character of this part of the conservation area.

7 Conclusions

It can be seen from the above that these proposals have been formulated in response to an analysis of the 'significance' of this building and the conservation area in which it is located, and have been informed by the policy context; the pre-application advice given by the Councils' Conservation Officer and the desire to provide a long term sustainable use for the building.

The building has been empty for approximately 6 years now, and is in a very poor state of repair, suffering regularly from vandalism.

The policy context is not designed to prevent all changes to listed buildings and conservation areas, but moreover it is to recognise what is truly significant about a building or a place, and to seek to protect that significance, whilst at the same time accommodating change that allow people to continue to use and enjoy them. This premise is stressed by Historic England, in their publication, 'Making Changes to Heritage Assets' 2016. This states

that 'An unreasonable, inflexible approach will prevent action that could give a building a new life; indeed it can eliminate that use. A reasonable and proportionate approach to owners' needs is therefore essential'. Conservation is not about resisting change, but is moreover about positive management of change for the future.

These proposals represent a feasible and realistic opportunity to save this building from further decay and dereliction, they would breathe new life back into it and the area generally, without compromising what is 'truly' significant.

In view of the above it is considered that the proposals do preserve the special character of this listed building and its setting and the character and appearance of the conservation area in which it is located, consequently they do meet the requirements of sections 16(2), 66(1) and 72 (1) of the Act. It is also considered that the proposals do respond appropriately to both the national and local policy context, and various guidance documents outlined above, and will secure the long term future of this valuable heritage asset.

Clive Alexander

Heritage Planning Consultant

Pre-application advice received on 18th August 2017

The Conservation Officers comments were as follows:

The Buildings

A complex build-up of structures with the main wide frontage house (no11) being the most significant element. This is late Georgian and at the rear of this, there are two wings which project back, these being of a slightly later date than the frontage range, possibly early-mid c19th.

The wing with the bay windows seems to have been extended back by about 1m and the bays added in the mid-late c19th. The rather splendid central stair hall is probably also of this date.

The end element nearest the school is late c19th. The rear single storey part of this, perhaps later, turn of the c19th and with a low blank modern brick extension attached to the rear of this.

The element to the right hand side of the driveway is also late c19th. The unit to the left hand side (no11a) is later still, post WWI perhaps, and extending right back towards the rear area. The upper first floor front part of this seems even later, 1920s perhaps. The rear wing on the right hand side of the driveway and the link bridge over are also probably post WWI.

No11a

From an examination of the interior (which is of a rather better quality than the plain exterior suggests) it seems this was clearly never a shop. Clive's view is that the retail area policy should be set aside here since the building is unsuited for retail use.

Interiors

Cornices

A few of the rooms have good cornices. The cornice within the first floor *blue flat (flat 5)* is the best of these. These should be retained and wherever possible left exposed to view. If this is not possible because of the requirement for party floor construction, then the ceilings need to be lowered so that the original cornices can be left undamaged above, rather than destroyed. The cornices should be shown on the existing survey plans and notes relating to their treatment are a necessary part of the application information.

Fire Places

These need to be left exposed and repaired, except where they are modern replacements. These too should be shown on the as existing plans.

Stair Hall (Yellow)

The smashed balustrades were of good quality and despite the damage they are capable of repair and should be pieced together, glued or resin repaired, rather than replaced by a copy. The need for a hallway smoke vent needs to be sorted out. It cannot go through the existing window as it is the most significant historic feature in the complex. The stained glass here and other stained glass in various places around the building need to be carefully protected during the works.

External Windows

The windows in the early c20th rear wings (where replaced by Upvc) should be reinstated in timber to the cross mullioned designs as per the crossing-bridge windows. The replacements could be double glazed with Slimlite glazing, if required.

The three storey bay window at the rear (*orange flat*) seems originally to have had a doorway at ground floor level. This should be reinstated as a pair of traditionally designed French doors set in the original frames (repaired).

The frontage windows to the Georgian house should stay as single glazed. Secondary glazing would be ok. *Selectaglaze* or *Storm Glazing* offer the most discreet secondary glazing systems. These windows originally had external shutters at both ground and first floor and these could be reinstated if required. The shutters would have most likely been solid panelled shutters rather than louvred. The originals may appear on early photos of the property (if there are any).

The proposed windows in the first floor front of no11a (*dark yellow flat*) should be fitted to the existing blind panels. These should be box sashes which should be recessed behind the reveals of the opening in the same way as for the ground floor windows. The centre blind window is narrower and perhaps this is best left blind.

Other External Changes

The proposed porch to the rear of the *pink flat* might best be designed as a timber porch rather than attempting to continue to brickwork right up to the corner.

An extra opening at ground floor level rear gable end of no11a (*green flat*) might be worthwhile.

The flat roofed modern extension to the rear over by the school would best be demolished (it is little more than a brick shed) exposing the rear elevation of the older building behind exposed to view.

Internal Layout

Generally the sketch scheme shows a very sensible understanding of the basic layout of the buildings ensuring that alterations are kept to a minimum.

The *orange* and *purple* flats ground floor would need to be re-planned so as to accommodate the area lost by the suggested demolition of the brick shed at the rear.

It would be nice to move the division wall between the orange and pink flats first floor over to the line of the original end wall of the Georgian house (but this is not essential if the planning of the flats cannot be made to work).

The existing panelled partitions at second floor level (*blue flat*) are not of any special merit and in Clive's view don't need to be retained if they get in the way of the layout. If they are taken away, perhaps they could be reused in the re-planning of the flats somewhere.

Otherwise, all the internal planning seems logical, acceptable and, generally, without causing harm to the listed building.

Site Planning

It would be good if some of the site divisions could be reinstated along historic lines and a study of the 1871 OS map might be helpful in the design of the site layout.

Archaeology

The site is in a significant location at the centre of The Bayle and any below ground excavation will need some sort of archaeological evaluation since the property is either located on the line of the old castle ramparts or within the early castle precinct.

Kind regards

Louise Daniels

Senior Planning Officer MRTPI

Major Projects Team

Dear Sir/ Madam

Pre-application advice received on 27th September 2017.

Pre-application reference: Y17/0049/PREAPP

I write with reference to your request for planning guidance on the change of use of No.11a and No.11 Church Street from office (class B1a) to residential use (class C3).

Site Constraints:

Both No.11a and No.11 Church Street are located within the settlement boundary of Folkestone and are within the Conservation Area.

11a Church Street is allocated as being within the 'Secondary Shopping Area' as defined in policy S4 of the Local Plan Review (2006). This policy has been retained within the 'Shepway District Local Plan Review: Policies Applicable 2013 Onwards' and the policy can be found using the following link: http://www.shepway.gov.uk/media/970/Local-Plan-Review-Policies-Applicable-2013/pdf/Local_Plan_Review_-_Policies_Applicable_2013.pdf.

This building is also defined as being within the 'Shopping Frontage for Folkestone Town Centre'. The building is considered to be grade II curtilage listed.

11 Church Street is not within the protected shopping area although it is adjacent to it, the site also falls within the Central/West Development Arc as defined in the Shepway Core Strategy. The building is also grade II listed.

Relevant Policies:

Any application for planning permission will be considered against policies in the Shepway Core Strategy Local Plan and the aims of the National Planning Policy Framework.

The following policies are considered to be of particular relevance to your enquiry, but please be aware these are provided for guidance only and may not be exhaustive:

Shepway District Local Plan Review: Policies Applicable 2013 onwards:

SD1, BE1, BE4, BE5, TR14, S3, S4, SS1, SS4 and CSD6.

http://www.shepway.gov.uk/media/970/Local-Plan-Review-Policies-Applicable-2013/pdf/Local_Plan_Review_-_Policies_Applicable_2013.pdf

National Planning Policy Framework (NPPF):

Section 1: Building a strong, competitive economy.

Section 2: Ensuring the vitality of town centres.

Officer Assessment

Principle of Change of Use:

11a Church Street is designated under policy S4 of the Shepway District Local Plan Review (2013) as a 'Secondary Shopping Frontage'. Therefore, any future application would need to demonstrate that a change of use of the ground floor unit to a Use Class other than A1, A2, A3 (A4, A5) i.e. residential (C3) would be appropriate to the character of the shopping area.

It is acknowledged that the Paragraph 23 of the NPPF recognises that residential development can play an important role in ensuring the vitality and viability of town centres. However, the main issue is the fact that both No.11 and 11a Church Street are within office (B1) use, which is listed as a 'main town centre use' in the NPPF.

Paragraph 20 of the NPPF states that planning authorities should plan proactively to meet the development needs of business; and Paragraph 23 that where town centres are in decline, local planning authorities should plan positively for their future and encourage economic activity.

The Council's Corporate Plan and the Core Strategy set out the importance of the boosting the local economy and increasing job opportunities in Shepway.

Regard therefore ought to be had to Policy CSD6 'Central Folkestone Strategy' of the Shepway Core Strategy Local Plan (2013). The proposed application site falls on the edge of the Central / West Development Arc where there are opportunities for mixed-use development providing major new office and retail businesses or other services that will contribute to the wider regeneration of the district and East Kent. Some residential development may be supported, provided it delivers genuinely mixed use development or it enables the full commercial potential of the area to be realised.

Furthermore, any future planning application would also need to satisfy Policy E4 of the Shepway District Local Plan Review (2013) and justify the loss of employment / office floorspace within Folkestone Town Centre.

The ELR (2017) states that the key challenge to achieving economic growth within the district is to provide a better supply of quality office premises in Folkestone that meets the needs of existing and prospective occupiers. Overall, the current demand for office space in Shepway comes from local businesses looking for smaller office premises up to 90sq.m (1,000sq.ft).

It is accepted that Permitted Development Rights (PDR) are having the effect of eroding the supply of office space in the District. The most significant effects are focused in and around Folkestone town centre where a number of office units had been converted into residential use. In addition to this, the lack of office developments and refurbishments in Folkestone, has resulted in much of the available stock of offices being largely unsuitable to meet the requirements of occupiers that are looking for more modern premises. Feedback from local agents as part of the ELR indicated that the lack of quality office space in Folkestone acts as the main deterrent to attracting new firms to the local market, with any enquiries for such modern office accommodation increasingly difficult to satisfy in the town.

However, in recent years a number of small offices have been refurbished in the Creative Quarter such as The Workshop at 32 - 40 on Tontine Street. These units are now well occupied which is a positive reflection of the growing success of Folkestone's start-up economy. No.11 and No.11a Church Street in their current state are likely to be unappealing to potential tenants. However, the success of refurbished premises in the Creative Quarter suggests that these units, which have the added benefit of being in close proximity to town centre services and on site car parking, indicate that if modernised to a high standard, these properties could be attractive to potential tenants and satisfy some of the demand for small, town centre office space.

Therefore, based on the evidence presented within the ELR the ground floor at the very least should be retained as office use, for both No.11 and No.11a Church Street, particularly considering the large expanse of on-site parking that accompanies these two properties. It is therefore considered that the first floor and above could accommodate residential use in principle.

Please be aware that the prior notification procedure for change of use from B1(a) offices to C3 (residential) would not apply as the buildings are listed and are therefore exempt from this procedure.

Impact upon Listed Building:

Both 11 and 11a Church Street are Grade II listed buildings. The proposal as submitted suggests predominately only internal alterations will be necessary. Therefore, regard should be had to the NPPF (para 134) which states that proposals that lead to less than substantial harm to the significance of a designated heritage asset, that this harm should be weighed against the public benefits of the proposal including securing its optimum viable use. The significance and the impact should be clearly stated in any future application by a Heritage Statement (NPPF Para 128).

Interior Changes:

The Conservation Officers Comments Regarding the Interiors are as follows:

Cornices - The cornice within the first floor blue flat (flat 5) is the best of these. These should be retained and wherever possible left exposed to view. If this is not possible because of the requirement for party floor construction, then the ceilings need to be lowered so that the original cornices can be left undamaged above, rather than destroyed. The cornices should be shown on the existing survey plans and notes relating to their treatment are a necessary part of the application information.

Fire Places - These must be left exposed and repaired where required, except where they are modern replacements. These too should be shown on the as existing plans.

Stair hall – The now smashed and damaged balustrades were of good quality and despite the damage they are capable of repair and should be pieced together, glued or resin repaired, rather than replaced by a copy. The need for a hallway smoke vent needs to be considered further as it will not be accepted to go through the existing window as it is the most significant historic feature in the complex. The stained glass here and other stained glass in various places around the building need to be carefully protected during the works.

Layout – The orange and purple flats ground floor would need to be re-planned so as to accommodate the area lost by the suggested demolition of the brick shed at the rear.

It would be nice to move the division wall between the orange and pink flats first floor over to the line of the original end wall of the Georgian house (but this is not essential if the planning of the flats cannot be made to work).

The existing panelled partitions at second floor level (blue flat) are not of any special merit and in Clive's view don't need to be retained if they get in the way of the layout. If they are taken away, perhaps they could be reused in the re-planning of the flats somewhere.

Otherwise, all the internal planning seems logical, acceptable and, generally, without causing harm to the listed building.

External Changes:

Windows - The windows in the early c20th rear wings (where replaced by Upvc) should be reinstated in timber to the cross mullioned designs as per the crossing-bridge windows. The replacements could be double glazed with Slimlite glazing, if required.

The three storey bay window at the rear (orange flat) seems originally to have had a doorway at ground floor level. This should be reinstated as a pair of traditionally designed French doors set in the original frames (repaired).

The frontage windows to the Georgian house should stay as single glazed. Secondary glazing would be ok. Selectaglaze or Storm Glazing offer the most discreet secondary glazing systems. These windows originally had external shutters at both ground and first floor and these could be reinstated if required. The shutters would have most likely been solid panelled

shutters rather than louvred. The originals may appear on early photos of the property (if there are any).

The proposed windows in the first floor front of no11a (dark yellow flat) should be fitted to the existing blind panels. These should be box sashes which should be recessed behind the reveals of the opening in the same way as for the ground floor windows. The centre blind window is narrower and perhaps this is best left blind.

The proposed porch to the rear of the pink flat might best be designed as a timber porch rather than attempting to continue to brickwork right up to the corner.

An extra opening at ground floor level rear gable end of no11a (green flat) might be worthwhile.

The flat roofed modern extension to the rear over by the school would best be demolished (it is little more than a brick shed) exposing the rear elevation of the older building behind exposed to view.

Amended plans were submitted by the agent following receipt of the above Conservation Officer comments. The changes are summarise as follows:

Ground Floor

- Flat 1 (Purple) – Cornice is now shown retained, layout as before
- Flat 2 (Pale Green) – Cornice is now shown retained, layout as before
- Flat 3 (Pink) – Cornice is now shown retained, both sides of splay fireplace retained, east corner extension omitted. Layout otherwise as before – ok.
- Flat 4 (Grey) – Cornice is now shown retained, large room not subdivided. Amended layout ok.
- Flat 5 (Peach) – Cornice is now shown retained, rear most west extension demolished as suggested, bay room now not subdivided, bathroom area taken from the adjoining flat. New layout ok.
- Flat 6 (Pale Blue) – Now incorporates a communal entrance from the rear yard, other minor amendments – Layout ok
- Flat 7 (Lilac) – Stack retained, smaller due to rearrangement with Flat 5.
- Communal Area (Yellow) – Now with a link through to a back door by the triangular yard. A small yard wall here is demolished – an improvement.

First Floor

- Flat 8 (Buff) – Rearranged layout at rear incorporating all of the link bridge – improved layout ok.
- Flat 9 (Mid-Blue) – Cornice is now shown retained and layout generally as before – ok.
- Flat 10 (Green) – Larger room now left as a single room, bay room subdivided at the rear – layout ok.
- Flat 11 (Peach) – The party wall between this flat and the old house is retained. This flat is now smaller and the layout is ok.
- Flat 12 (Pink) – This flat now includes the whole of the old house frontage – a much better layout – ok.
- Flat 13 (Purple) – Layout as before, minor improvements at third floor level as discussed on site – ok.

· Communal Area (Yellow) – This now shows an auto smoke vent in the ceiling venting out onto the roofs above – this is ok.

The following comments were received from the Conservation Officer based on the above changes:

Generally, all the changes represent improvements to the layout which make the conversion scheme even more responsive to the original layout of the buildings. The flat layouts work well, in particular the loss of the infill porch (Flat 3) and the demolition of the modern extension to the side of Flat 5 and rearrangements to give this flat a private courtyard, are welcomed improvements.

Parking and Highways:

In terms of parking, please refer to the Kent Design Guide Interim Guidance Note 3 which relates to residential parking and Cycle Parking Standards included in Appendix 2 to the Local Plan. Please note, Kent Highway Services will be consulted formally on any future application and will assess the application in terms of parking. Any future scheme should provide adequate parking and cycle parking facilities for the proposed development in accordance with the guidance. If parking is not possible, a case would need to be made for the lack of parking.

Contributions:

I wish to draw your attention to the Council's CIL (Community Infrastructure Levy). The CIL charge for this site is currently £0 per sqm of floor area. Although no payments are required at this time a CIL form must still be submitted at validation stage.

Summary:

The first floor and above of both 11 and 11a Church Street could be converted to residential use in principle however, the ground floor of both properties should be retained as office use to contribute to the vitality and viability of the Town Centre.

Documents required to be submitted with an application:

It is the responsibility of the applicant/agent to ensure that all relevant national and local requirements are met. Any application that does not incorporate the appropriate drawings and associated information may be made invalid.

It is considered that the following list of documents will be required to be submitted as part of any future planning application:

- Full planning application form,
- Fee
- Site location plan, with the application site edged clearly with a red line and any other land within the ownership of the applicant outlined in blue,
- Existing and proposed block plan (a scale bar, north point and dimensions should be shown),
- Full set of scaled existing and proposed floor plans, roof plans and elevations (a scale bar, north point and dimensions should be shown).
- Details of refuse and cycle storage
- Sustainability assessment
- Transport statement
- Heritage Statement

- Design and Access Statement
- CIL form

This advice is based solely on the information that has been provided in the pre application submission and does not take into account the views of statutory consultees and other third parties that would be consulted as part of any subsequent planning application, or unforeseen material planning issues that may arise during the processing of the application.

Consequently, whilst this is the advice of officers, it does not guarantee any subsequent decision made or action taken by the Council in relation to the proposal when full account has been taken of all material considerations following the submission of a formal application.

Yours faithfully

Miss L Daniels

Senior Planning Officer