

A04

F/TH/18/0291

PROPOSAL: Erection of extensions to enlarge existing medical centre to provide medical and community facilities comprising a two storey extension to front of existing building with alterations to entrance, a two-storey extension to eastern end of building with plant room within roof, installation of solar panels to roof slopes and creation of new pedestrian and vehicular access, together with 46 parking spaces to front and rear and use of adjacent land for the provision of an additional 54 spaces, with associated structures, enclosures and landscaping.

LOCATION:

Bethesda Medical Centre Palm Bay Avenue MARGATE Kent CT9 3NR

WARD: Cliftonville East

AGENT: Mr Matthew Garvey

APPLICANT: Bethesda Medical Centre And NHS Thanet CCG

RECOMMENDATION: Approve

Subject to the following conditions:

1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

GROUND;

In accordance with Section 91 of the Town and Country Planning Act 1990 (as amended by Section 51 of the Planning and Purchase Act 2004).

2 The development hereby approved shall be carried out in accordance with the submitted drawings numbered 3636.PL.202 Rev B, 3636.PL.103 Rev C, 3636.PL.105 Rev A, received 7 March 2018, 3636.EX.00 Rev B, 3636.PL.001 Rev B, 3636.PL.100 Rev F, 3636.PL.101 Rev D, 3636.PL.102 Rev D, 3636.PL.201 Rev B, 3636.PL.301 Rev B, 3636.PL.401 Rev A and 3636.PL.402, received 25 April 2018.

GROUND;

To secure the proper development of the area.

3 The external materials and external finishes to be used in the development hereby approved shall be of the same colour, finish and texture as those on the existing property.

GROUND;

In the interests of visual amenity in accordance with Policy D1 of the Thanet Local Plan

4 Prior to the commencement of any development on site details to include the following shall be submitted to and approved by the Local Planning Authority and should be carried out in accordance with the approved details.

- (a) Routing of construction and delivery vehicles to / from site
- (b) Parking and turning areas for construction and delivery vehicles and site personnel
- (c) Timing of deliveries
- (d) Provision of wheel washing facilities
- (e) Temporary traffic management / signage
- (f) Measures to control noise affecting nearby residents
- (g) Dust control measures

GROUND;

In the interests of highway safety and neighbouring amenity, in accordance with Policy D1 of the Thanet Local Plan and the National Planning Policy Framework.

5 The development hereby approved shall incorporate a bound surface material for the first 5 metres of the access from the edge of the highway.

GROUND;

In the interests of highway safety.

6 The area shown on the approved plan numbered 3636.PL.100 Rev F received 25 April 2018, for vehicle parking and manoeuvring areas, shall be kept available for such use at all times and such land and access thereto shall be provided prior to the first use of the extension hereby permitted.

GROUND;

Development without adequate provision for the parking or turning of vehicles is likely to lead to parking inconvenient to other road users and detrimental to amenity and in pursuance of Policy D1 of the Thanet Local Plan.

7 Prior to the first use of the extension hereby approved, full details of the zebra crossing to be provided in Palm Bay Avenue shall be submitted to and approved in writing by the Local Planning Authority. The zebra crossing as approved shall be completed and operational prior to the first use of the extension.

GROUND:

In the interests of pedestrian and highway safety.

8 Prior to the first use of the extension hereby approved, full details of the vehicular exit point onto Palm Bay Avenue, as shown on drawing numbered 3636.PL.100 Rev F received 25 April 2018, shall be submitted to and approved in writing by the Local Planning Authority. The works shall be carried out and completed in accordance with the approved details prior to the first use of the extension.

GROUND:

In the interests of highway safety.

9 Prior to the first use of the extension hereby approved, visibility splays of 2metres by 2metres behind the footway on both sides of the new access with no obstructions over 0.6m above footway level shall be provided and thereafter maintained.

GROUND:

In the interests of highway safety.

10 Prior to the first use of the extension hereby approved, signage for the proposed vehicular one-way system within the site shall be installed.

GROUND:

In the interests of highway safety.

11 Prior to the first use of the extension hereby approved, full details of both hard and soft landscape works, as indicated on drawing numbered 3636.PL.100 Rev F, received 25 April 2018, to include

- o species, size and location of new trees, shrubs, hedges and grassed areas to be planted
- o the treatment proposed for all hard surfaced areas beyond the limits of the highway
- o walls, fences, other means of enclosure proposed

shall be submitted to, and approved in writing by, the Local Planning Authority.

GROUND;

In the interests of the visual amenities of the area and to adequately integrate the development into the environment in accordance with Policies D1 and D2 of the Thanet Local Plan.

12 All hard and soft landscape works shall be carried out in accordance with the approved details. The works shall be carried out prior to the first use of the extended part of the building, or in accordance with a programme of works to be agreed in writing with the Local Planning Authority. Any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of a similar size and species.

GROUND;

In the interests of the visual amenities of the area in accordance with Policies D1 and D2 of the Thanet Local Plan

13 The refuse storage facilities and plant store enclosure as specified upon the approved drawings numbered 3636.PL.401 Rev A and 3636.PL.402 received 25 April 2018 shall be provided prior to the first use of the extension and kept available for that use at all times.

GROUND:

To secure a satisfactory standard of development and in the interests of the amenities of the area, in accordance with Policy D1 of the Thanet Local Plan.

14 Prior to the first use of the extension hereby permitted, full details of the cycle parking facilities to be provided in the location as shown on drawing numbered 3636.PL.100 Rev F received 25 April 2018, shall be submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.

GROUND:

In the interests of promoting increased cycling in accordance with policy TR12 of the Thanet Local Plan.

15 No development shall take place until the method of piling foundations has been submitted to and agreed in writing by the Local Planning Authority. Any such piling shall thereafter be undertaken in accordance with the agreed details.

GROUND;

To prevent harm to human health and pollution of the environment, in accordance with the advice contained within the National Planning Policy Framework.

16 In the event that contamination is found that was not previously identified at any time when carrying out the approved development, it shall be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment shall be undertaken at that time in accordance with a site characterisation report that shall be submitted to and approved in writing by the Local Planning Authority and where remediation is necessary a remediation scheme shall be submitted to and approved in writing by the Local Planning Authority, including remediation measures to render harmless the identified contamination given the end use of the site and the surrounding environment, including controlled waters. The remediation measures shall be implemented as approved and completed prior to the recommencement of works. Prior to the occupation of the approved development and following completion of measures identified in the approved remediation scheme a verification report shall be submitted to and approved in writing by the Local Planning Authority.

GROUND:

To ensure that the proposed development will not cause harm to human health or pollution of the environment, in accordance with the advice contained within the National Planning Policy Framework.

17 No infiltration of surface water drainage into the ground is permitted other than with the written consent of the Local Planning Authority. The development shall be carried out in accordance with the approved details.

GROUND:

To ensure that the development does not contribute to unacceptable levels of water pollution caused by mobilised contaminants in line with paragraph 109 of the National Planning Policy Framework.

18 No Development shall take place until a detailed sustainable surface water drainage scheme for the site has been submitted to (and approved in writing by) the local planning authority. The detailed drainage scheme shall demonstrate that the surface water generated by this development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm) can be accommodated and disposed of within the curtilage of the site without increase to flood risk on or off-site. The drainage scheme shall also demonstrate that silt and pollutants resulting from the site use and construction can be adequately managed to ensure there is no pollution risk to receiving waters.

GROUND:

To ensure the development is served by satisfactory arrangements for the disposal of surface water and to ensure that the development does not exacerbate the risk of on/off site flooding, in accordance with the NPPF

19 No building hereby permitted in any phase shall be occupied until an operation and maintenance manual for the proposed sustainable drainage scheme is submitted to (and approved in writing) by the local planning authority. The manual at a minimum shall include the following details:

- A description of the drainage system and it's key components
- An as-built general arrangement plan with the location of drainage measures and critical features clearly marked
- An approximate timetable for the implementation of the drainage system
- Details of the future maintenance requirements of each drainage or SuDS component, and the frequency of such inspections and maintenance activities
- Details of who will undertake inspections and maintenance activities, including the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage system throughout its lifetime

The drainage scheme as approved shall subsequently be maintained in accordance with these details.

GROUND:

To ensure that any measures to mitigate flood risk and protect water quality on/off the site are fully implemented and maintained (both during and after construction), as per the requirements of paragraph 103 of the NPPF and its associated Non-Statutory Technical Standards.

20 Prior to the installation of any external lighting, a detailed lighting scheme shall be submitted to, and approved in writing by the Local Planning Authority. This scheme shall take note of and refer to the Institute of Lighting Engineers Guidance Notes for the Reduction of Obtrusive Lighting, GN01, dated 2011 (and any subsequent revisions) and shall include a layout plan with beam orientation and a schedule of light equipment proposed (luminaire type; mounting height; aiming angles and luminaire profiles) and an ISO lux plan showing light spill. The scheme of lighting shall be installed, maintained and operated in accordance with the approved details.

GROUND:

To ensure that light pollution is minimised in the interest of the visual and residential amenities of the area, in accordance with Policy D1 of the Thanet Local Plan.

INFORMATIVES

Please be aware that obtaining planning permission and complying with building regulations are separate matters - please contact building control on 01843 577522 for advice on building regulations

It is the responsibility of the applicant to ensure, prior to the commencement of the development hereby approved, that all necessary highway approvals and consents where required are obtained and that the limits of highway boundary are clearly established in order to avoid any enforcement action being by the Highway Authority. The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under such legislation and common law. It is therefore important for the applicant to contact KCC Highway and Transportation to progress this aspect of the works prior to commencement on site

Across the county there are pieces of land next to private homes and gardens that do not look like roads or pavements but are actually part of the road. This is called 'highway land'. Some of this land is owned by The Kent County Council (KCC) whilst some are owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil. Information about how to clarify the highway boundary can be found at <https://www.kent.gov.uk/roads-and-travel/what-we-look-after/highway-land/highway-boundary-enquiries>.

It is the responsibility of the applicant to ensure, prior to the commencement of the development hereby approved, that all necessary highway approvals and consents where required are obtained and that the limits of highway boundary are clearly established in order to avoid any enforcement action being by the Highway Authority. The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under such legislation and common law. It is therefore important for the applicant to contact KCC Highway and Transportation to progress this aspect of the works prior to commencement on site

A formal application for connection to the public sewerage system is required in order to service this development. Please contact Southern Water, Southern House, Sparrowgrove, Otterbourne, Hampshire SO21 2SW (Tel: 0330 303 0119) or www.southernwater.co.uk.

Please be advised that Advertisement consent may be required for signage within the site.

It is important that infiltration should occur into clean, uncontaminated, natural ground and an unsaturated zone be provided between the invert levels of each soakaway and any groundwater. Therefore, a ground investigation should be included within the detailed design phase to confirm that new soakaways are in appropriate discharge zones along with any other necessary testing to support the design.

SITE, LOCATION AND DESCRIPTION

The application site is an established medical centre located on the cliff top between Palm Bay Avenue and Hodges Gap Promenade. The Coastguard Station lies to the east of the site and a coach park lies to the west. On the south side of Palm Bay Avenue, directly opposite the site, there are detached bungalows. Beyond Hodges Gap to the west is a large area of public open space laid to grass and the rear elevations of 3 and 4 storey buildings, including the Walpole Bay Hotel. To the east lies the coach park with recycling facilities provided to the front adjacent to Palm Bay Avenue. Beyond the coach park and recycling enclosure there is further public open space with the Palm Bay Café beyond. To the seaward side of the site (to the north) is Princes Walk which provides a pedestrian footpath which continues along the clifftop. The existing medical centre is a two storey pitched roof building with an octagonal single storey pitched roof building containing the pharmacy to the front of the building. A low level hedge bounds the site with the main pedestrian and vehicular access onto Palm Bay Avenue.

RELEVANT PLANNING HISTORY

F/TH/01/1072 - Erection of detached two-storey doctors' surgery for provision of general medical services and pharmacy, with associated access, parking and external works GTD 06.03.2002

PROPOSED DEVELOPMENT

The application is submitted by the Clinical Commissioning Group to extend and adapt the existing medical centre, which is currently undersized for the number of patients attending. This will include the merging of the Bethesda and Northdown medical practices, absorb patients affected by the closure of Union Row, and include a number of other services in order to create a Primary Care Home (PCH) Hub serving Margate and the wider area. The proposed building design has been sized to meet the future projections of 32,000 patients expected by 2022, and includes the provision of 47, no. clinical rooms (GP consulting /treatment/ nurse/ GP training etc) with associated administrative and support areas, a cafe, two large multi-function spaces for education, fitness and other functions, and an area for the taskforce.

The proposal seeks to expand the existing facility through the erection of a two storey extension with a raised roof within the central section containing a plant room projecting from the roof on the rear elevation. The extension would be located over the existing car parking area within the site and the existing parking relocated. A further first floor extension, ground floor and two storey extension is proposed to enlarge the existing building to the front elevation. A new access would be provided to Palm Bay Avenue to provide an entrance and exit for both vehicles and pedestrians. The existing car parking would be re-positioned with further car parking, totalling 100 spaces, provided on the coach park to the east.

DEVELOPMENT PLAN POLICIES

Thanet Local Plan 2006 (Saved Policies)

CF1 - Community Facilities

D1 - Design Principles

D2 - Landscaping

TR10 - Coach Parking (Policy TP05 of the Draft Local Plan)

TR12 - Cycling

TR16 - Car Parking Provision

NOTIFICATIONS

Neighbouring occupiers have been notified and a site notice posted. Four representations have been received raising the following concerns:

- Inadequate parking provision
- Increase in traffic
- Inconsiderate parking by people obstructing driveways.
- Buses should be diverted so that they stop outside the centre on a regular basis.
- The 6 additional parking spaces offered is woefully inadequate bearing in mind the number of new services to be provided. There is already a major problem with overflow car parking in Palm Bay Avenue.
- It is doubtful if patients requiring treatment would be well enough to walk, ride bicycles or use public transport.
- The medical centre is positioned on the northern extremity of its catchment area. Ideally, the new super medical centre should be sited more centrally so that it is more accessible by patients.
- With the present medical staffing shortages would there be sufficient professionals to staff the expanded medical centre?
- The medical centre is positioned quite close to the Palm Bay cliffs. Is there any evidence of erosion of the chalk which would threaten the medical centre.
- Affects local ecology
- Development too high
- More open space needed on development
- The current spaces are not utilised fully at present as patients still park in the road and park across private drives.
- No mention has been made about the faint double yellow lines which were once there to be reinstated.
- Lack of public transport for anyone without a car. Anyone living to the south of the catchment area who does not have their own transport will find it very difficult to access the proposed facility and will probably have to resort to Taxis.
- Not good for the elderly and less mobile patients who at present use The Northdown Surgery.

CONSULTATIONS

Strategic Planning Policy Manager - A review of coach parking sites identified under Local Plan Policy TR10 was instigated in late 2016. This included a review of the existing coach parking locations in the district. The application site was identified as one that was not suitable for coach parking, and it was proposed to remove the site from the draft Local Plan at Publication stage. The Council is currently assessing a number of sites for future provision.

KCC Highways and Transportation -

(Final Comment)

The proposed zebra crossing is acceptable in principle but is likely to require some amendment, which can be resolved through the separate technical approval required for the alterations to the highway. The provision of the crossing ensures adequate and safe access for pedestrians to/from the expanded medical centre.

The proposed new exit point is acceptable in principle but may require some additional parking restrictions on the existing highway to maintain adequate visibility for drivers exiting. Again this can be dealt with through the highway technical approval process.

The amount of car parking now proposed (100 spaces in total) is acceptable and, whilst the above highway alterations will require the removal of some existing on-street parking in the vicinity of the site, the development overall is unlikely to lead to an unacceptable increase in on-street parking.

The impact of the additional traffic likely to be generated by the proposals on the local highway network has been assessed and is acceptable.

Taking all of the above into account the proposals are unlikely to have a severe impact that would warrant a recommendation for refusal on highway grounds, subject to safeguarding conditions.

(Initial Comment)

I refer to the above planning application and would comment as follows:

1. I am aware that pre-application advice was given in relation to car parking however it appears this was incorrectly quoted in relation to the number of spaces per treatment/consulting room, which should be a maximum of 4 per room. In reality the parking provision should be based on the likely demand and accumulation taking into account the services/facilities available and likely modal split. The TRICS data used in the Transport Statement for the proposed floor area suggests a maximum accumulation/demand of 71 spaces, however the sites used do not appear to be comparable to the proposed development in terms of both size and services available. My visit to the site showed that the existing car park was full at both 9.15 am and 11.45 am, with some staff and patient parking also taking place on Palm Bay Avenue, clearly demonstrating that the proposed additional 6 parking spaces for the expansion of the medical centre will be insufficient especially bearing in mind the range of proposed additional patient services currently not available and the

proposed use as a base for other NHS and care professionals on top of the medical centre staff. The applicant should therefore carry out an assessment of parking demand based on a medical centre of similar size, nature, location and modal split; or from a first principles approach based on the services/facilities to be offered.

2. I note the modal split data provided for the existing Bethesda Medical Centre and Northdown Surgery and in particular the 30% of patients that walk to/from the sites. The proposed medical centre will clearly attract a significant additional number of pedestrians, the vast majority of which will need to cross Palm Bay Avenue to access the site. There are no crossing facilities in the immediate vicinity of the site and the road is very wide with cars parked on both sides, making crossing the road difficult and hazardous. A zebra crossing should therefore be provided near the site entrance and it appears this could be achieved outside no. 5 Palm Bay Avenue. The crossing will require build-outs as well as the usual zig-zag markings to ensure adequate visibility is available. A scale plan showing details of the crossing should be submitted together with a Stage 1 safety audit and designer's response to any issues raised in the audit.

3. The proposal for a new separate vehicular entry and exit point are acceptable in principle, however visibility at the latter will be obstructed by cars parked in Palm Bay Avenue particularly to drivers approaching from the west on the near side of the road. Parking restrictions will therefore be required to the west of the exit point to ensure the required visibility splay of 2.4 metres x 43 metres is maintained. This will partly be provided by default due to the requirements of the zebra crossing, however any additional restrictions required should be clearly shown on the plans.

4. Clarification is required as to why the trips generated by both the existing and expanded medical centre have been added together in the junctions assessments carried out, as this appears to give an overly robust assessment of the impact. An assessment of the site access junction should also be carried out to ensure that right turning vehicles do not unduly delay through traffic and/or cause excessive queuing. This assessment will need to take account of the actual road width available with the zebra crossing/on-street parking in place.

5. End parking spaces adjacent to walls/fences/landscaping should be widened to 2.7 metres to provide sufficient room and hard surface for people to enter/exit a vehicle. The aisle width for 90 degree parking arrangements should be 6 metres.

6. The vehicle swept paths for delivery/service vehicles use a 9.5 metre pantechicon, however a larger vehicle may need to access the site (commercial waste collection vehicles for example tend to be larger and comparable to an 11.3 metre refuse vehicle). The vehicle tracking should therefore be checked for this larger vehicle and the access/egress points adjusted accordingly. The revised swept paths will also need to take account of the proposed zebra crossing and any on-street parking.

I wish to place a holding objection until the above matters have been satisfactorily resolved.

Environment Agency -

(Final Comment)

No objection subject to safeguarding conditions.

The submitted drainage assessment outlines options for the site drainage, using existing and new soakaways. It also notes limited depths to recorded groundwater and uncertainty about the structure of existing soakaways, which require further investigations. Until we have seen detailed designs, confirmation that all soakaways will be in clean ground and will not discharge directly to groundwater we are unable to comment on the acceptability of the proposed outline designs further.

(Initial Comment)

Planning permission should only be granted to the proposed development if planning conditions are imposed.

The proposed site lies on a chalk principal aquifer used for public water supply, site investigations have identified made ground at the site and there is a medium risk of contamination that could be mobilised by surface water infiltration from the proposed sustainable drainage system (SuDS) leading to pollution of controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is located upon Principal aquifer.

In light of the above, we believe that the use of infiltration SuDS may not be appropriate in this location as depth to groundwater is very limited. We therefore request a condition be included that there is no infiltration of surface water drainage into the ground.

Without this condition we would object to the proposal in line with paragraph 109 of the National Planning Policy Framework because it cannot be guaranteed that the development will not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.

Southern Water - Southern Water requires a formal application for any new connection to the public foul sewer to be made by the applicant or developer. We request that should this application receive planning approval, an informative requiring connection to the public sewerage system.

The design of drainage should ensure that no groundwater, land drainage or surface water run-off will enter public foul sewerage system.

The planning application form makes reference to drainage using Sustainable Urban Drainage Systems (SUDS).

The Council's Building Control officers or technical staff should be asked to comment on the adequacy of soakaways to dispose of surface water from the proposed development.

KCC Flood and Water Management

(Final Comment)

The proposed drainage scheme in the foul and surface water drainage assessment dated 21/02.2018 is appropriate for this development.

The design layout has changed since we were last consulted with the proposed extension of the car park on the former lorry park site. The use of permeable paving for the car park is adequate to manage surface water. Updated hydraulic calculations show that the use of permeable paving in the east car park would be able to accommodate the 100 year (+40% for climate change) storm event. Therefore, we have no objection to the updated layout.

We carry forward our previous advisory on undertaking further ground investigations at the detailed design phase to ensure that any new soakaways are in appropriate discharge zones and would work as intended.

We would refer you to our previous comments made on 20 March 2018 that included recommendations for soakaways and our conditions for this development.

(Initial Comment)

The proposed drainage scheme in the foul and surface water drainage assessment dated 21/02/2018 is appropriate for this development. The proposed creation of four additional soakaways on site to manage the additional surface water runoff from the site is adequate to manage with the increased impermeable area created by the extension. Included within the scheme is the proposed use of permeable paving in the rear car park. This measure will provide increased infiltration for the site and contribute in reducing the risk from surface water flooding.

We would like to add an advisory about groundwater and soakaways. It was mentioned in the foul and surface water drainage assessment that borehole WS02 and WS04 encountered what appeared to be groundwater in its drilling however, it was unclear if the water came from nearby soakaways.

It is important that infiltration should occur into clean, uncontaminated, natural ground and an unsaturated zone be provided between the invert levels of each soakaway and any groundwater. Therefore, a ground investigation should be included within the detailed design phase to confirm that new soakaways are in appropriate discharge zones along with any other necessary testing to support the design.

Recommendation for calculating runoff:

The Ciria SuDS Manual (2015) states that the FEH methods should be the preferred approach for developing runoff estimates within surface water management design (Chapter 24.3). The manual acknowledges that this is dependent upon the access to FEH documentation.

The EA report, "Rainfall runoff management for developments" Report SC030219 (2013), mapped the variation of the rainfall depth relationship between FSR and FEH with both

return period and duration. For 1 year events, FSR :FEH ratio is greater than 1; however for greater return intervals, the FSR:FEH ratio is generally less than 1 therefore indicating that FSR is under-predicting rainfall depths when compared to FEH for longer duration and greater return interval events.

Our calculation of 26.25 mm/hr was a pragmatic application of the EA report across Kent. It is based on utilising the ratio FSR:FEH for the 100 year 6 hour event, which shows that FSR values are 70 to 90% of FEH values. Taking a precautionary approach we have assessed the ratio as 0.8, therefore applied to average Kent M5-60 value of 21 mm/hr produces a rainfall depth of 26.25 mm/hr.

If you do not agree with the calculated FSR value then we recommend either:

(a) utilising FEH; or,

(b) utilising the methodology proposed with "Rainfall runoff management for developments" Report SC030219 (2013) which includes the appropriate FEH rainfall factor.

We will not accept an unadjusted FSR value of 20 mm/hr.

Should your authority be minded to grant permission for the above development, we would recommend safeguarding conditions.

KCC Biodiversity Officer - The application site does not contain habitats or features suitable for protected species nor likely to have an impact upon any designated habitats or sites. Therefore, we consider that the proposed development is unlikely to have any ecological impacts. This is also supported by the submitted ecological survey.

Kent Police Designing Out Crime Team - Following discussion with the Applicant's Agent the design meets many aspects that will help reduce crime and the opportunity for crime.

Allan Gilbert, Development Contributions, Economic Development, KCC - As the application does not include any residential development necessitating County contributions we will not be commenting further.

Environmental Health - No objection subject to conditions being added relating to noise during the construction stage and any additional lighting at the site.

Natural England - No objection. Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on designated sites and has no objection.

COMMENTS

This application is brought before members as the inclusion of the designated coach parking area means the proposal is a departure from Policy TR10 of the Thanet Local Plan.

Principle

This proposal would represent a departure from the Thanet Local Plan by virtue of the use of the designated coach parking area for additional parking. Saved Policy TR10 of the current Local Plan relates to Coach Parking and states that the District Council will retain the Palm Bay Car Park specifically for coach parking to serve the tourist trade. The Coach Parking policy has been carried forward into the Draft Local Plan as Policy TP05, however, further work has been carried out within the Strategic Planning Team regarding the allocation of coach parking sites, and it is no longer intended to designate the application site for coach parking within the Emerging Draft Local Plan. Given the direction of travel of the Draft Local Plan, and the fact that the site is no longer considered to be suitable for coach parking due to its location, the loss of this coach parking site for an alternative use is considered to be acceptable in principle.

Policy CF1 relates to community facilities and supports proposals for new community facilities including emergency services, educational services and social services and supports provision for identified social and other needs. The policy states that planning permission will be granted for new community facilities if the proposals are not contrary to other local plan policies and the community use and location are demonstrated as appropriate. The proposal is for the extension of an existing medical centre, the need for which has been justified by the CCG within their district wide plans for healthcare, and therefore the location of this community facility is considered to be acceptable. Whilst the proposed development would be contrary to Policy TR10, the need for the community facility is considered to outweigh the retention of the site for coach parking (given the information above).

As such, the principle of the proposed development, as a departure to Policy TR10 of the Thanet Local Plan, is considered to be acceptable.

Impact upon Character and Appearance of area

The existing Bethesda Medical Centre sits prominently on the cliff top between Palm Bay Avenue and Hodges Gap Promenade. The proposed extensions would enlarge the building towards the east, over the existing car park and incorporate the coach parking area situated immediately behind the recycling enclosure fronting Palm Bay Avenue.

The extensions would replicate design features of the existing surgery. The two storey extension would be built to within 5 metres of the eastern boundary adjacent to the existing coach park. The new wing would be built in line with the existing front elevation with the far portion, containing a treatment and minor surgery room projecting slightly forward of this. The extensions to the front elevation of the existing building would enlarge existing accommodation to improve the use of the internal space. There is limited opportunity to extend to the rear due to the need to maintain visibility splays for the operation of the Coastguard Station. As a result the enlargement of the building is proposed towards the eastern boundary adjacent to the coach park.

The extension would double the width of the existing building along its frontage with Palm Bay Avenue. The height of the development would remain the same as existing with the

exception of the ridge height of the middle 17 metre section which would increase in height by approximately 1 metre. The eastern elevation would appear wider by approximately 5.6 metres when viewed from longer views further along Palm Bay Avenue. Whilst the enlargement of the building would be highly visible the overall height has been kept to two storeys and together with its design the extensions would relate well to the surrounding open character of the area.

Local Plan Policy D2 requires new development to provide landscaping, where appropriate and possible, to facilitate the assimilation of new development into the landscape. The cliff top location of this site has an open character and this openness is an important feature of the landscape. The existing low level landscaping currently has a positive benefit to the overall appearance of the site and this boundary treatment would be retained where possible and further landscaping would be introduced to break up the large expanse of hardstanding parking area. The existing hedges and fencing to will be retained and new privet hedge with post and rail fencing to match the existing is proposed around the northern and eastern boundaries of the coach park area to be used for parking.

The generators and plant currently located on the east side of the building will be relocated to a new enclosure to the west of the site. This would be located adjacent to a new brick and timber bin enclosure located on the coach park, allowing refuse trucks to collect waste without disrupting users of the car park.

The materials to be use in the construction of the extensions are buff coloured brick with grey brick detailing. Brick detailing has been included within the eastern elevation to provide more variation to the appearance of this elevation and break up the otherwise large expanse of brick. The fibre cement slate roof tiles would match the existing. The windows would be blue powder coated aluminium to match those on the existing building. The choice of materials would match those of the existing building and thereby help assimilate the extension into the overall development.

Overall the enlarged building together with additional soft landscaping would assimilate well within the streetscene and it is therefore considered that the proposal is compatible with the aims and objectives of Thanet Local Plan Policy D1 and the guidance within the National Planning Policy Framework.

Transportation

There are 45no. off-street parking spaces provided within the grounds of the existing medical centre. The application as originally submitted proposed to increase the number of off-street parking spaces by six, to a total of 55no. spaces, but given the significant increase in floorspace to the medical centre, KCC Highways and Transportation raised concerns with the lack of car parking provision.

The application has since been amended to incorporate an additional area of land within the application site. The area added to the application is the existing coach parking area to the east, and through its inclusion additional off-street car parking can be provided, creating a total of 100no. off-street car parking spaces. KCC Highways and Transportation raise no

objections to these amended plans, and consider the number of spaces now proposed to be sufficient to mitigate the impact of the enlarged medical centre.

The proposed development utilises the existing vehicular access, and following the submission of amended plans enlarging the site area, a further vehicular access is proposed onto Palm Bay Avenue, which would allow vehicles to enter and leave the site using separate access points. Swept path analysis plans have been submitted that prove refuse vehicles can enter and exit the site in a forward gear. KCC have advised that the new exit point is acceptable in principle, but may require some additional parking restrictions on the existing highway to maintain adequate visibility for drivers exiting. This can again be dealt with through separate technical highway approval.

Concern was initially raised by KCC in relation to pedestrian movement. The increased size of the medical centre would attract a significant number of additional pedestrians, the vast majority of which would need to cross Palm Bay Avenue in order to access the site. Cars are often parked on both sides of the road, and there are no crossing facilities within the immediate vicinity, so concern was initially raised by KCC that pedestrian movements to and from the site would be both difficult and hazardous. In order to address the concerns raised by KCC, a technical note has been submitted by the applicant that includes an indicative plan indicating the provision of a zebra crossing with associated build outs, located close to no. 5 Palm Bay Avenue. KCC have advised that the zebra crossing is acceptable in principle, but further amendments will be required, which can be dealt with via condition and through separate technical highway approval. It is therefore considered that a safe and suitable access to the site can be achieved for all people in accordance with paragraph 32 of the NPPF.

The Local Plan aims to reduce the need to travel and promote walking, cycling and public transport as environmentally-friendly alternatives. The proposed plans provide for a dedicated pedestrian access onto Palm Bay Avenue, and dedicated cycle parking areas for the parking of 23no. bikes are located to the front of the site, for use by both staff and patients. There is a bus stop outside of the site, which has an hourly service, and a bus stop within 9 minutes walk of the site, which has 4no. buses per hour. It is therefore considered that the site can be accessed using sustainable forms of transport, in accordance with the Local Plan and NPPF.

KCC are satisfied with the submitted information subject to safeguarding conditions, and do not consider that the proposed development as a whole would have a severe residual cumulative highway impact, in accordance with paragraph 32 of the NPPF.

The impact upon highway safety is therefore considered to be acceptable, and in accordance with Thanet Local Plan Policies TR12 and TR16, and the NPPF.

Living Conditions

The nearest residential properties are opposite the site in Palm Bay Avenue and there are few other residential properties in close proximity to the site. The hours of use of the existing surgery is Monday to Friday from 8am to 8pm. The enlarged premises would potentially be open for visitors every day of the week including Sundays and Bank Holidays and for longer

periods of the day. As a result of the increased pedestrian and vehicular movements to and from the site during this time, there could be an impact with regards to unacceptable levels of noise and disturbance to nearby residential occupiers. Environmental Health has been consulted, and no specific concern to this has been raised. Furthermore, Palm Bay Avenue is a fairly wide road and the front elevation of the extension would be set back from the front boundary by approximately 20 metres, resulting in a distance between the main surgery building and residential properties opposite of approximately 40 metres. This distance together with the existing use of the site as a surgery, means that the proposed development is not likely to result in a significant increase of noise and disturbance to neighbouring residential occupiers beyond that which already exists from the current use. Mitigation is also included in the form of both existing and proposed hedging around the boundary of the site, to create a barrier between the proposed parking areas and the surrounding area.

Given the distance to neighbouring properties, the impact upon light, outlook and privacy is considered to be acceptable.

Overall it is considered that the impact upon the living conditions of neighbouring occupiers is acceptable, and in accordance with Thanet Local Plan Policy D1 and paragraph 17 of the NPPF.

Biodiversity

The applicant has submitted a Habitat Appraisal Survey Report that concluded that the habitats on the site holds negligible potential for reptiles or amphibians and no bats have been recorded within the desk study. The KCC Biodiversity Officer has been consulted and has confirmed that the proposed development is unlikely to have any ecological impacts and this has been supported by the submitted ecological survey. The impact upon biodiversity is therefore considered to be acceptable.

Drainage

The application includes a proposed drainage scheme that includes the provision of four additional soakaways on site to manage the additional surface water runoff from the site. KCC SUDs have been consulted and advise that this provision is adequate to manage with the increased impermeable area created by the extension. They also support the proposal for the use of permeable paving within the car park area, as this will provide increased infiltration for the site and contribute to reducing the risk of surface water flooding, in accordance with the NPPF..

The Environment Agency has been consulted and advise that the proposed site lies on a chalk principal aquifer used for the public water supply. Site investigations have identified made ground at the site and there is a medium risk of contamination that could be mobilised by surface water infiltration from the proposed sustainable drainage system (SuDS) leading to pollution of controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is located upon Principal aquifer. As a result, the Environment Agency has advised that the use of infiltration SuDS may not be appropriate in this location as depth to groundwater is very limited.

In response to the comments raised, the agent has submitted a revised drainage assessment that outlines options for the site drainage, using existing and new soakaways. The Environment Agency has advised that the submitted information is not detailed enough to prove that all soakaways will be in clean ground and not discharge directly to groundwater, and therefore require further details to be submitted via condition. Furthermore, Southern Water advise that the design of the drainage should ensure that no groundwater, land drainage or surface water run off will enter the public foul sewerage system.

Southern Water advise that informatives be attached requiring an application to be submitted for a connection to the public sewerage system, although given the presence of the existing medical centre on site, it is likely that this connection is already in place.

The impact upon flood risk is therefore considered to be acceptable, and in accordance with the NPPF, subject to safeguarding conditions.

Other Matters

- Kent Police

The Applicant's Agent has discussed with Kent Police crime reduction design features in line with Secure By Design recommendations. In particular the perimeter and boundary treatments and how defensible planting could be used. Access to the site and parking has been discussed, along with the careful use of lighting and CCTV, and the agent has agreed that any new doors and windows to be fitted will meet the Save By Design (SBD) requirements. It is therefore considered that the proposed development would incorporate measures to prevent crime and disorder, in accordance with Policy D1 of the Thanet Local Plan.

- Civil Matters

Concern has been raised regarding obstruction of driveways and inconsiderate parking. These are civil matters and are not considered by this application.

Conclusion

Whilst the proposed development would result in the loss of a designated coach parking area under Policy TR10 of the Thanet Local Plan; work carried out within the Local Plans team indicate that this specific coach parking area is no longer necessary, and as such it is no longer intended to retain the site for coach parking within Draft Local Plan Policy TP05 of the Emerging Draft Local Plan. Furthermore, there is a need to expand the medical centre to serve the needs of the community, as confirmed by the CCG. The proposed expansion of the medical centre as a community facility is supported under Policy CF1 of the Thanet Local Plan, and would result in limited impact upon the surrounding character and appearance of the area, highway safety, and neighbouring amenity. Given the direction of travel of the Emerging Draft Local Plan, and the need for the community facility, it is recommended that

the proposed development be approved by members as an acceptable departure to Policy TR10 of the Thanet Local Plan, subject to safeguarding conditions and the provision of off-site highway works to provide a zebra crossing for pedestrians.

Case Officer

Rosemary Bullivant

TITLE: F/TH/18/0291

Project Bethesda Medical Centre Palm Bay Avenue MARGATE Kent CT9 3NR

Scale:

