

**A05**

**F/TH/23/1562**

**PROPOSAL:** Installation of external wall insulation, erection of roof screen, and replacement roof lining, together with alterations to windows, doors, existing balconies, and entrance

**LOCATION:** Harbour Towers Hertford Street RAMSGATE Kent CT11 9EY

**WARD:** Central Harbour

**AGENT:** Mr Ciaran Gallen

**APPLICANT:** Thanet District Council

**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 05300 Rev P02, 05301 Rev P01, 01102 Rev P01, 05100 Rev P01, 05101 Rev P02, and 05200 Rev P01, received 26/11/2023.

**GROUND;**

To secure the proper development of the area.

3 Prior to the commencement of the development, a noise impact assessment shall be submitted to and approved by the Local Planning Authority. The scheme shall comply with guidance found in BS5228 -1:2009+A1:2014 Noise and Vibration Control on Construction and Open Sites. Upon commencement of the development, work shall be carried out in accordance with the approved scheme.

**GROUND:** To protect the amenities of residential and nearby occupiers, in accordance with the aims of Policy QD03 of the Thanet Local Plan and the guidance contained in the NPPF.

4 Prior to the commencement of construction activities, a Construction Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority. The Construction Environmental Management Plan shall include amongst other matters

Details of: hours of construction working; measures to control noise affecting nearby residents

Wheel cleaning/chassis cleaning facilities including access and egress locations.

Dust control measures

Lighting control measures

Pollution incident control

Arrangements for a direct and responsive site management contact for nearby occupiers during construction (signage on hoardings, newsletters, resident's liaison meetings, etc.)

Site waste Management - Accurate waste stream identification, separation, storage, registered waste carriers for transportation and disposal at appropriate destinations.

The works shall thereafter be carried out at all times in accordance with the approved Construction Environmental Management Plan, unless any variations are otherwise first submitted to and approved in writing by the Local Planning Authority.

**GROUND:** To protect against harmful environmental impacts and the amenities of residential and nearby occupiers, in accordance with the aims of Policy QD03 of the Thanet Local Plan and the guidance contained in the NPPF.

## SITE, LOCATION AND DESCRIPTION

Harbour Towers is a substantial and irregularly shaped 1960's tower block, currently in use as residential accommodation, lying to the north of Ramsgate town centre. It sits on a gradient behind West Cliff Road and is within a heavily built out area. It is not prominently viewed from the busier streets surrounding it given the nearby built form, however it is sensitively located in close proximity to Ramsgate Conservation Area and a number of listed buildings.

The site is seen within its own context, being the only tower block of this kind in the immediate vicinity. It fronts two roads (Albert Street and Hertford Street), and has raised car parks surrounding it.

The current tower block appears a light blue colour with beige and brown accents in a mixture of cladding and render, and has a number of concrete balconies with a black framed box design and yellow screening. External windows and doors appear in white uPVC. The building has a brick skirt, an undercroft to the front, some green coloured plant on the roof, and some soft landscaping around the primary frontages.

## RELEVANT PLANNING HISTORY

F/TH/05/1283 - Alterations to the external elevations comprising installation of overcladding system, renewal of balcony balustrading and provision of covering and hand railing to roof. Granted 21/11/2005.

## PROPOSED DEVELOPMENT

This application seeks planning permission for retrofit works for fire remediation purposes. It is stated that the existing external cladding is a polystyrene insulation which is flammable and needs to be addressed, along with a small amount of combustible resin covering external walls. It is also stated that the panels covering the balconies are likely to be constructed of combustible materials.

The proposal seeks new external wall insulation, replacement windows, doors and balconies elements, a replacement roof and a number of internal upgrades to address fire regulations and correct damaged or poor condition elements.

The works would see external alterations to the appearance of the building, changing to an off-white render finish with a mixture of aluminium and fibre cement cladding in white and grey tones. A new liquid membrane would be applied to the roof and existing redundant equipment would be removed here. New screening and anti-fall barriers would be introduced and existing plant upgraded. Aluminium doors and windows would replace the existing uPVC openings and the entrance area and undercroft would be upgraded.

The overall appearance has been taken from consultation with residents and the works would be funded through the Building Safety Fund and Social Housing Decarbonisation Fund.

#### DEVELOPMENT PLAN POLICIES

SP11 - Ramsgate

SP35 - Quality Development

SP36 - Conservation and Enhancement of Thanet's Historic Environment

HE02 - Development in Conservation Areas

HE03 - Heritage Assets

QD01 - Sustainable Development

QD02 - General Design Principles

QD03 - Living Conditions

#### NOTIFICATIONS

Letters were sent to neighbouring property occupiers, a site notice posted close to the site and an advert was posted in the local paper. No representations have been received.

**Ramsgate Heritage and Design Forum:** The massing is in two parts, should the two vertical elements have a different colour? Could the colours be warmer or more exciting? Perhaps a colour study or artist study? The options presented to residents were rather limited. Could there not be 3 variations between the 3 towers?

We have concerns due to wind noise from the vertical balcony railings and horizontal planting screening. Has a noise assessment been conducted or perhaps a mock up installed at high level?

The render should be self cleaning silicone render to reduce potential staining as is evident.

## CONSULTATIONS

**TDC Conservation Officer:** Following a review of the proposed application I would consider there to be a neutral to positive implication to the setting and appearance of the surrounding conservation area given that its outward appearance is largely being updated aesthetically.

**TDC Environmental Health:** Thank you for consulting Environmental Health on this application for which we offer the following comment in relation to noise and the construction activities of the building:

Harbour Towers is in a predominantly residential area and the proposed works are significant and may occur for an extended period of time. The construction will be occurring at height and will allow for an unrestricted distribution of sound. Consideration should be given to a noise impact assessment being undertaken. The proposed condition is:

Prior to the commencement of the development, a noise impact assessment shall be submitted to and approved by the Local Planning Authority. The scheme shall comply with guidance found in BS5228 -1:2009+A1:2014 Noise and Vibration Control on Construction and Open Sites. Upon commencement of the development, work shall be carried out in accordance with the approved scheme.

In order to ensure that environmental effects from the proposed construction works are planned for and managed, it is appropriate that a CEMP should be submitted. It is recommended that the following condition is applied:

Prior to the commencement of construction activities, a Construction Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority. The Construction Environmental Management Plan shall include amongst other matters

Details of: hours of construction working; measures to control noise affecting nearby residents

Wheel cleaning/chassis cleaning facilities including access and egress locations.

Dust control measures

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Pollution incident control

Arrangements for a direct and responsive site management contact for nearby occupiers during construction (signage on hoardings, newsletters, resident's liaison meetings, etc.)

Site waste Management - Accurate waste stream identification, separation, storage, registered waste carriers for transportation and disposal at appropriate destinations.

The works shall thereafter be carried out at all times in accordance with the approved Construction Environmental Management Plan, unless any variations are otherwise first submitted to and approved in writing by the Local Planning Authority.

**Health and Safety Executive:** "Information provided with this application appears to focus on the external wall system, including, balconies, window and door replacements, roof

replacement, including new perimeter roof stand. It is unclear from the project description and the information provided as part of the application if the scope of the proposed changes goes beyond that.

It is also noted that the fire statement is incomplete and does not provide relevant fire information to the standards relating to fire safety/ approach applied (section 6 (e)). This fire safety information is necessary for HSE to complete a full assessment of a design proposal. For future reference, the fire statement document should be completed fully in line with guidance published by DLUHC, by a suitably competent person. A link to that guidance and other supplemental guidance can be accessed on Planning and fire safety - Planning and fire safety - Planning Portal.

Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations."

The response goes on to include comments about window replacement works with the potential to impact fire integrity, the material composition of balustrades and balconies, and the condition and location of existing hydrants, however states that these comments do not contribute to HSE's substantive response and should not be used for the purposes of decision making by the local planning authority.

**KCC Highways:** This development proposal does not meet the criteria to warrant involvement from the Highway Authority.

## COMMENTS

This application is reported to Planning Committee as a submission made on behalf of Thanet District Council.

### **Principle**

There is no in-principle objection to the alteration of an existing residential building. The main considerations are the impact on the character and appearance of the surrounding area, and the living conditions of occupiers.

### **Character and Appearance**

Paragraph 135 of the National Planning Policy Framework (NPPF) states decisions should ensure that developments will function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, sympathetic to local character and history, establish or maintain a strong sense of place, and optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development and create places that are attractive, welcoming and distinctive, as well as safe, inclusive and accessible. Policy QD02 of the Thanet Local Plan outlines that the primary aim of new development is to promote or reinforce local character and provide high quality and inclusive design that is sustainable in all other respects. Proposals should therefore relate to surrounding development, form and layout, be well designed, pay particular attention to context and identity of location, scale, massing, rhythm,

density, layout and materials, and be compatible with neighbouring buildings and spaces. Any external spaces and landscape features should be designed as an integral part of the scheme.

The site lies adjacent to the Ramsgate Conservation Area and sits in close proximity to a number of listed buildings. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty on local planning authorities to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. Paragraphs 203 and 205 of the NPPF advises that LPAs should take account of the desirability of sustaining and enhancing the significance of heritage assets. Policy SP36 sets out that the Council will support, value and have regard to the historic or archaeological significance of Heritage Assets by protecting the historic environment from inappropriate development. Policy HE02 sets out that within conservation areas, development proposals which preserve or enhance the character or appearance of the area, and accord with other relevant policies of the Plan will be permitted but new development which would detract from the immediate or wider landscape setting of any part of a conservation area will not be permitted

In terms of the external facade changes the Design and Access statement sets out that the design concept has been to create a distinctive dark base, using fibre cement panels, to visually link with surrounding low rise buildings, with a lighter colour palette to the upper floors. It is stated that three design options were presented to the residents of the building and wider community consultation has taken place, therefore there is general community support for the current proposal. The colours and materials selected would create a modern appearance. The building is seen in its own context and therefore whilst it would not necessarily assimilate with the surrounding finishes and appearances, the colours chosen and use of panels would have some integration with nearby buildings but the overall appearance would be self-supporting. The continued vertical focus and addition of softer colours to the upper floors would help break up the appearance of the building and the use of vertical banding would create more visual consistency than the current ad-hoc arrangement of render and cladding.

The addition of external wall insulation would see an increase in the overall projection of the outer walls by around 0.3m. This would be a marginal change visually and unlikely to result in any unacceptable impact on the appearance of the area.

The proposed balcony changes will see an increase to the overall width of each, the removal of the box like appearance, the use of blue metal railings, with solid screening elements to the sides and part of the front. A small section of the front of the balcony would remain open. Again the building would be seen autonomously and although an unusual feature, the design has been informed by the previous colour association and set out as preferred by the community and those that took part in the public consultation.

Windows and doors would be replaced and the existing uPVC would be upgraded to light grey aluminium frames, which would move closer to the outer edge of the new external wall layer after insulation has been added. Given the proximity to the historic environment, aluminium is preferable to uPVC and the Council's Conservation Officer considers the proposal to be positive.

A number of upgrades to the entrance and undercroft would be undertaken and include upgraded entrance columns, insulation, lighting, and alterations to the glazed entrance. These changes would reflect the other alterations proposed for the building and create a more consistent glazing pattern overall.

It is proposed to change the location of the name identifying the building by reducing the height of it and having the two words sit next to each other rather than in one long run. This is not likely to materially affect the appearance of the building or wider area and is considered to be acceptable.

The roof alterations would see the erection of a perimeter screen and to support working with the plant at this height. Although adding additional built form, the need for this element has been clearly set out and the horizontal emphasis would help to prevent any sense of additional bulk. The overall roof area is not prominently viewed from the ground, however views from the west looking eastwards are gleaned from a higher land level and some visibility is evident here. The overall finish and colour would be light and replace the existing railing system. Overall these works are not considered significantly harmful. The existing roof covering would be upgraded and replaced with a warm roof system. These changes are unlikely to be appreciable from the surrounding area.

On balance the works are considered to be acceptable and comply with the spirit of policies SP36, QD02, HE02, and HE03 of the Thanet Local Plan, and the guidance of the NPPF.

### **Living Conditions**

Paragraph 123 of the NPPF states that planning decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Paragraph 135 states that decisions should create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for future users. Policy QD02 of the Thanet Local Plan outlines that new development should be compatible with neighbouring buildings and spaces, and should be inclusive in its design for all users. It should improve people's quality of life by creating safe and accessible environments and promote public safety and security. Policy QD03 outlines that new development must not lead to unacceptable living conditions through overlooking, noise, vibrations, light pollution, overshadowing, loss of natural light or a sense of enclosure. Policy QD01 of the Thanet Local Plan sets out that all new buildings and conversions of existing buildings must be designed to reduce emissions of greenhouse gases and have resilience to function in a changing climate and will be required to make the best use of solar energy, passive heating and cooling, natural light, natural ventilation and landscaping.

The scheme proposes a number of works to address fire safety. This is a material planning consideration and LPAs are required to consult the Health and Safety Executive (HSE) on any proposals for works to buildings of this scale. A fire statement has been provided by the applicant and reviewed by HSE who agree that the scheme can progress to the next stage.

In terms of the impact on the works on neighbouring property occupiers, most of the works would be minimal and any changes to the thickness of the building or extent of balconies would be modest. The building thickness would increase by 0.3m which would likely be imperceptible to most neighbouring occupiers. The balconies would increase slightly from a 2.4m walk out space (length) to 2.9m. The building is set back away from nearby properties. All balconies would still be inset from the wall edge and therefore no new harm is expected to occur as a result. The roof alterations and provision of screening would be at a height that would not be expected to be experienced by neighbouring properties.

Ramsgate Heritage and Design Forum have raised concerns that wind noise could be problematic from the design of the proposed balconies. This could be addressed through suggested conditions below.

In terms of any impact on the current occupiers of the building, works are intended to be undertaken while the tower block is occupied. There are 48 units here over 9 floors and the works have the potential to cause significant disruption. There are a number of potential matters that require consideration. These include ensuring the continued ability of occupiers to retain heat and a reasonable standard of living whilst works are undertaken, along with the potential for noise, dust, vibrations and general disturbance to occupiers and nearby occupiers. The Council's Environmental Health Team have raised concerns about the height at which works would be undertaken and the potential for the unrestricted distribution of sound. They have therefore suggested conditions surrounding the submission of a noise impact assessment and a construction management plan. Both of these are considered to be reasonable and have been agreed to by the applicant.

Overall the works would see thermal upgrades and environmental improvements to the building and subject to the above conditions and a satisfactory noise and construction management plan, the works are likely to comply with the aims of policies QD01, QD02 and QD03 of the Thanet Local Plan and the aims of the NPPF.

## **Conclusion**

Overall the proposed works would see the upgrading of a 1960's tower block to create both a more resilient building, and a contemporary appearance. The site is in close proximity to the historic environment, however the works would be seen in the unique context of the site itself, and would have some integration with the wider area. There is general community support for the design that has been chosen and the works are not considered likely to be harmful to the character and appearance of the area or nearby heritage assets.

The HSE have considered the design proposal and agree that the scheme can progress to the next stage.

The works have the potential to cause significant noise and disturbance more widely, and to impact the current living conditions of those living in the tower block during construction. As a result, a number of safeguarding conditions are recommended and subject to these, the works are considered to be acceptable. The application is recommended for approval, subject to conditions.



**Case Officer**

Vicky Kendell-Bryant

TITLE: F/TH/23/1562

Project Harbour Towers Hertford Street RAMSGATE Kent CT11 9EY

