

D09

F/TH/24/1229

PROPOSAL: Change of use from Educational Facility (Use Class F1(a)) to Integrated Health Hub (Use Class E(e))

LOCATION: Nelson College London Carey Building And Surrounding Land Northwood Road Broadstairs Kent

WARD: St Peters

AGENT: Mr Zheng Chee Cham

APPLICANT: Kent Community Health NHS Foundation Trust

RECOMMENDATION: Defer & Delegate

Defer and delegate for approval subject to the submission of a signed legal agreement (within 6 months) securing the obligations relating to the travel plan and its monitoring, and the following safeguarding 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 M10486-HUN-CRY-00-DR-A-02-0155 Rev XA, M10486-HUN-CRY-01-DR-A-02-0160 Rev XA, M10486-HUN-CRY-02-DR-A-02-0165 Rev XA, M10486-HUN-CRY-00-DR-A-02-0100 Rev XD, received 01 November 2024.

GROUND;

To secure the proper development of the area.

3 Prior to the first use of the development hereby permitted, a Staff Parking Management Strategy shall be submitted to, and approved in writing by, the Local Planning Authority. The strategy shall demonstrate how the following objectives are met:

- Reduction of staff parking at site at any one time,
- Ensuring opportunities are taken to optimise staff schedules and shift patterns so as to minimise parking conflict,
- Encouraging the use of alternative methods of transport to access the site,
- Management of electric vehicle charging spaces to maximise use of the spaces on site.
- Provision of review process for ongoing monitoring of effectiveness of the strategy

The development shall be carried out in accordance with the approved parking management plan in perpetuity.

GROUND:

In the interests of highway safety.

4 Prior to the commencement of the development hereby permitted, details of the 5no. electric vehicle charging points to be provided within the development, including their location and design, shall be submitted to and approved in writing by the Local Planning Authority. The electric vehicle charging points shall be provided prior to the first use of the development and thereafter maintained, and shall be managed in accordance with the Staff Parking Management Strategy.

GROUND

To protect air quality, in accordance with Policy SP05 of the Thanet Local Plan and the advice as contained within the NPPF

5 Prior to the first use of the development hereby permitted, 18no. secure and covered cycle parking spaces shall be provided and made available for use, with details of their location and design to be submitted to, and approved in writing by, the Local Planning Authority. The cycle parking shall be provided in accordance with the approved details prior to the first use, and thereafter maintained.

GROUND

To promote cycling as an alternative form of transport, in accordance with Policy TP03 and SP43 of the Thanet Local Plan.

6 Prior to the first use of the development hereby permitted, 59no. parking spaces (including 3no. disabled spaces) shall be made available for use within the site, as shown on plan numbered M10486-HUN-CRY-00-DR-A-02-0100. The parking spaces shall thereafter be maintained.

GROUND

To provide satisfactory off street parking for vehicles in accordance with Policy TP06 of the Thanet Local Plan and the advice contained within the NPPF

SITE, LOCATION AND DESCRIPTION

The site is located on the edge of Westwood Town Centre, in an area that is allocated for employment use. The site fronts onto Northwood Road, but there is an access road leading from Millennium Way to the parking area serving the site.

The site consists of an existing wide 3-storey building that fronts onto the roundabout at the junction of Northwood Road, Westwood Road, and the A256. The building was previously in educational use by Christchurch University, and has since been taken over by Nelson

College, along with the 2-storey detached building to the rear of the application site. To the south of the application site is a 3-storey building accommodating Kent Innovation Centre in business use, and to the south-west of the application site is a 2-storey building also in commercial/business use. A large parking area exists between the buildings with spaces allocated to each of the buildings within the overall site.

Opposite the site to the north and east are residential properties, either bungalows or 2-storey dwellings.

RELEVANT PLANNING HISTORY

F/TH/00/0900

ERECTION OF 1 X 2 STOREY AND 1 X 3 STOREY BUILDINGS FOR THE PURPOSES OF EDUCATION (USE CLASS D1) WITH ANCILLARY BUSINESS USES (USE CLASS B1) AND FINANCIAL/PROFESSIONAL SERVICES (USE CLASS A2) CAR PARKING PROVISION AND LANDSCAPING BEING AMENDMENTS TO BLOCKS D AND E, THE SUBJECT OF PLANNING PERMISSION REFERENCE NUMBER F/TH/99/0800

Granted - 21st November 2000

F/TH/99/0800

ERECTION OF 7500 SQ.M. (80,727 SQ.FT.) OF BUILDINGS FOR THE PURPOSES OF EDUCATION WITH ANCILLARY USES

Granted - 10th December 1999

PROPOSED DEVELOPMENT

The proposal is for a change of use of the Carey building, which fronts the roundabout at the junction of Northwood Road, Westwood Road, and the A256, from an educational facility within Use Class F1(a) to an Integrated Health Hub within Use Class E(e).

The accommodation will provide space for: i) Primary care for a patient list size of 7,000 to delivery GMS activity; ii) Primary care same day access hub with the ability to offer up to 60,000 appointments per year phased in over 5 years; iii) Community services including health visitors and community nurse provision; iv) Phase 1 of the CDC programme to implement a temporary solution including MRI, Echo Cardiogram and Phlebotomy; v) Dental Services (to be confirmed); vi) Age UK providing support with social care, wider determinants of health and sign posting to services.

At ground floor level the proposal is to provide:

- i) Primary Care: 10x Consultation & Examination Rooms (C/E), 2x Counselling Rooms, 2x Treatment Rooms
- ii) Community Services: 8x C/E Rooms (includes 1x Children, 1x Physiotherapy, 2x Podiatry, 4x C/E Rooms)
- iii) Community Diagnostic Centre : 6x C/E Rooms (includes 3x Respiratory Rooms, 2x Cardiology Rooms, 1x Phlebotomy Rooms)

The first floor is intended to provide additional clinical spaces.

The second floor is intended to provide new staff admin space for the wider building.

DEVELOPMENT PLAN POLICIES

Thanet Local Plan 2020

Policy SP05 - Land Allocated for Economic Development
Policy SP30 - Biodiversity and Geodiversity Assets
Policy SP38 - Healthy and Inclusive Communities
Policy SP40 - New Medical Facilities at Westwood
Policy E01 - Retention of existing employment sites
Policy CM01 - Provision of New Community Facilities
Policy QD02 - General Design Principles
Policy QD03 - Living Conditions
Policy SE05 - Air Quality
Policy TP02 - Walking
Policy TP03 - Cycling
Policy TP06 - Car Parking

Broadstairs and St Peters Neighbourhood Plan

Policy BSP6 - Sustaining Community Facilities
Policy BSP9 - Design in Broadstairs & St Peter's
Policy BSP11 - Retention of Employment Space
Policy BSP12 - Full Fibre Broadband connections

NOTIFICATIONS

Neighbouring occupiers have been notified and a site notice posted. One letter of support has been received commenting that the health hub is a much needed service in the area and will take the strain off of the local hospital.

Broadstairs and St Peters Town Council - The Committee unanimously recommends SUPPORT for this application. The committee notes KCC Highways objection, however, the benefits outweigh parking issues. This will be an important community facility which should not be delayed. The facility should encourage the use of public transport or walking and unsafe parking would be for TDC to police.

Broadstairs Society - The Society welcomes the introduction of an integrated health hub as it will be of benefit to the community. However, what is not clear from a cursory reading of the documents is what special provision is to be made for people with a visual impairment. Perhaps, that question can be put to the applicants?

CONSULTATIONS

KCC Highways -

(Final Comment)

Thank you for your consultation in relation to the above planning application. I have the following comments to make with respect to highway matters :

Further to previous comments dated 26 November and 18 December 2024, the applicant (Paul Mews Associates instructed by Kent Community Health NHS Foundation Trust) has submitted a Highways Response document and an updated Transport Statement dated 20 December. KCC Highways have maintained an objection to the proposal due to the lack of sufficient parking available for the size of the facility proposed.

It is noted that the application now does not propose the MRI unit, which would have removed 9 car parking spaces. The application now proposes a total of 59 car parking spaces (retained), including 3 disabled bays. The disabled bays are outside of the red line plan, and assumed to be under different ownership. Should planning permission be granted, these spaces would need to be conditioned accordingly to ensure their use for the medical facility. If this is not possible, alternative appropriate disabled bays would be required, which will need to be appropriately sited with the shortest possible walking distance between the bays and the entrance to the facility.

In line with parking policy, a maximum of 208 parking spaces are outlined for a development of this scale (one space per two staff, and 4 spaces per consulting room). For the health, dental and GP consulting rooms, this would equate to 144 spaces. The policy requirement accounts for the inevitable overlap of arrivals and departures, and delays across the day. Without sufficient parking, the application is likely to lead to inconsiderate, haphazard and illegal parking in the locality. Concerns remain as to how the number of staff will be accommodated and managed. The large number of staff would require a detailed management plan which has not been outlined to date.

KCC Highways have previously highlighted that Westwood Road is the worst congested road in Thanet in the morning peak, with pedestrians and cyclists accessing the schools, HGVs accessing the business parks as well as general traffic at Westwood. Kent crash reports indicate that there have been a number of crashes (including two serious) in the vicinity of Westwood Road / Northwood Road roundabout. One fatal crash took place to the south of Millennium Way, on Northwood Road.

As part of the Thanet District Council Transport Strategy aspirations remain to complete a west-east highway link at Millennium Way between the A256 Westwood Road and the A254 Margate Road. Plans have not progressed and are unlikely to take place due to halted discussions with Tesco to progress a scheme forward. Any development in the locality should be looking to coordinate with other land owners to bring forward the Relief Strategy or find some way to offset the cumulative impact.

Comments were previously outlined with regard to the comparable floorspace represented through the TRICS assessment being considerably less than the proposed floorspace. It is understood that by filtering sites further, to only include sites above 500sqm, that there would only be one site included. For this reason, it was suggested that the sites weren't comparable in terms of the 1.6 car parking spaces per 100 metres. The GP surgery element

has now been included as a TRICS site (CA-05-G-01) has been utilised, which was outlined in previous comments as a possible example of a medical practice with a similar floor space. No other GPs have been utilised in the assessment, which is not considered to be robust.

The TRICS scenario (health clinics, dental and GP) represents 508 (as opposed to 501 as stated in the TS) two way trips per day. When compared to the existing education use, this represents an additional 151 arrivals and 144 departures in a day. This differs slightly from the figures quoted in the TS, and have been calculated from the table 7. It is clear that an increase in movements will have a severe impact on the local highway network in this location.

Previous comments raised concerns with regard to the number of staff anticipated at the site, which is outlined as 126 staff. Kent Community Health makes up the majority of the staff, with 81 staff in total, 68 of which anticipated to be mobile working in the community. Of these mobile staff it is anticipated that a maximum of 25 staff will be in the building at any one time. Para 1.6 of the response note states that the TRICS sites used may have had a number of mobile staff, which I consider to be an unsubstantiated assumption.

The KCHFT facility requires 13 staff (81 minus 68) on site, with an additional 11 staff for the GP surgery element (5 clinical and 6 admin), and a further 37 staff unaccounted for in the assessment. By my calculation, this would see 61 staff (without accounting for the mobile community staff) on site during operating hours. If half the staff drove to the facility this would equate to 30 car parking spaces, leaving 29 spaces for the health, GP and dental facility.

Parking accumulation has been calculated to ascertain that a maximum of 58 spaces are required between 13:00 and 14:00. My concerns remain that the figures derived from TRICS are very different from the actual parking demand.

18 cycle parking spaces are proposed, which should be secured by way of a suitable condition should permission be granted.

EV charging should be provided for 10% of spaces, and should be secured by way of a suitable condition should permission be granted.

Section 6 of the TA outlines the objectives of a Travel Plan. KCC Travel Plan Monitoring Officer has been consulted to outline the following comments in relation to the current document.

6.7 - Once appointed, include name and contact details of the Travel Plan Co-ordinator.

6.11 - Measures and Action Plan to include:

Statement of SMART targets for the Travel Plan, relating to mode share and other interventions.

Include a tabular Action Plan linked to targets and timescales.

Details of ongoing Travel Plan monitoring once occupied

Include staff and visitor questionnaire to monitor travel patterns.

6.12 - More information on walking and cycling including P.R.O.W and Cycle Map routes to see what is available in the surrounding area.

6.18 - Submit more information regarding bus and rail details such as proximity of closest bus stops and train stations, bus routes, destinations and frequencies. Details are provided in the TS, but this information is required in the Travel Plan.

6.19 - Insert link and information to car sharing websites.

6.21 - Provide more information on car parking and how they will be managed for staff and visitors including permits and costs.

6.24 - Submission of the Induction Pack once produced and ensure it is attached to the Travel Plan document.

7.2 - More information into how many cycle spaces will be available and will these be undercover?

Ensure the site details are included such as Site description, details of site operations including deliveries and site accessibility for disabled persons by all modes of transport.

KCC Highways do not consider that the Travel Plan is robust enough to represent a modal shift that would be required for an application of this scale. Should the application be granted,

a Travel Plan will require a monitoring fee of £1,422 for auditing in years 0, 1 3 and 5.

The applicant has sought to justify that the amount of parking proposed is suitable for the size of the proposed facility. Unfortunately, KCC Highways are unable to accept the number of spaces (59) as suitable for the size of the health facility. The number of staff is not comparable with sites assessed in TRICS, where it is assumed that a comparable site within public health would have been more beneficial to drawn comparisons on a first principals approach.

The applicant has highlighted that of the KCHFT element, 68 of 81 staff will work within the community. With a maximum of 25 staff required on site at any one time, in addition to full time staff (61) and patients, it is unclear how the site will be managed.

As previously outlined, without assurance of sufficient parking and management, concerns of the wider impact on the highway network remain. Inadequate parking means that patients will be forced to seek parking elsewhere in the locality, thus promoting the crossing of an extremely busy major distributor road at less than desirable crossing points. Therefore, I confirm that KCC Highways maintain the objection and recommend the application is refused on highway safety grounds.

(Interim Comment)

Further to previous comments dated 26 November, a further Transport Assessment has been submitted dated 16 December 2024 on the Planning Portal. KCC Highways raised an objection, and recommended refusal on the grounds of insufficient parking.

The submitted TS seeks to illustrate that sufficient parking is available by reassessing the TRICS outputs for health (1,887sqm) and dental (525sqm), thus removing the 'landlord' floorspace from the assessment.

The previous assessment saw 400 two way movements per day. The updated TS outlines 233 two way trips for health. Utilising the same 1.6 average parking spaces per 100sqm, this

asserts 30 car parking spaces for 1,887sqm to provide 30 car parking spaces. For the dental aspect, the proposal sees an additional 159 two way movements per day, making a total of 392 two way movements per day, a slight decrease from the previous assessment.

The staff shift patterns have been outlined in further detail. An expected 129 staff (and increase from the previous TS which stated 109), which will be made up of 5 clinical staff and 6 admin between 0:30 and 17:00. It has been outlined that as part of the community health, out of 81 staff, 68 will be mobile, accessing the site once in the morning, and returning again in the afternoon. The MRI will have 18 clinical staff, and the dental will have 9 clinical and 10 admin staff.

Of 68 mobile staff (with vehicles of their own) entering and exiting the site during the day, this raises concern as to where the staff will be anticipated to park. This has not been taken into account as to how these movements will be accommodated and raises concerns.

The sites utilised in TRICS unfortunately do not appear comparable, which I have sought to assess in turn.

- o Wiltshire: Physiotherapy unit. 17 staff and 250sqm floor area. Located in a residential area. Staff park in an unmarked area (2 spaces) and clients parked on the unmarked frontage (5 spaces) and on the road.

- o Norfolk: Foot clinic. 9 staff and 295sqm floor area. The site is mainly surrounded by residential streets, with a school across the road to the north. The clinic owns the driveway where vehicles park on-site.

- o Warwickshire: Chiropractor clinic. 7 staff and 305sqm floorspace. On the western edge of Stratford-Upon-Avon, the site is surrounded by residential development. Free parking available. 2.581 spaces per 100sqm.

- o Aberdeen: Multi treatment clinic. 8 staff and 229 sqm floorspace. The site is mainly surrounded by residential streets including an Iceland store directly across Broomhill Road to the south-east, plus some local small retail units and other businesses. Adjacent to the site are commercial business where parking takes place.

- o Kilkenny: Physical Therapy Unit. 8 staff and 1,720sqm floorspace. 2 parking spaces are reserved for staff.

- o Cavan: Physiotherapy unit. 6 staff and 400sqm floorspace.

Within TRICS, a more appropriate comparison is site CA-05-G-01 - located in Cambridgeshire with 45 staff and 1046sqm of floorspace. The location is comparable being residential in character, close to a school and a business park. Parking is provided as 4.302 spaces per 100sqm, although the site is in close proximity to Cambridge North railway station where is appears parking is provided.

The TRICS outputs for clinic clearly does not provide a representative floorspace. It has previously been suggested that the site should be separated between GP, clinics and dental. I would consider that GPs have an overall higher demand for parking than the surveyed clinics.

At this stage, my objection still stands as I am unable to accept that the amount of parking proposed will not have a severe impact on the highway network

(Initial Comment)

Thank you for your consultation in relation to the above planning application. I have the following comments to make with respect to highway matters :

The site is accessed off a vehicle access from Millennium Way, which is operated as a left in left out arrangement off Northwood Road. Westwood Road to the north of the site is considered to be one of the busiest roads in Thanet at this time. Northwood Road does not have any parking restrictions in place, where the highway can often become busy with parked cars.

The building has an extant use of educational facilities with an internal floor area of 3,231 sqm. The proposal seeks a change of use to a health hub comprising 36 consulting rooms.

The application outlines that 56 car parking spaces are to be retained, with the provision of new cycle parking facilities.

The health hub is outlined to comprise of the following:

Primary care (consultation and treatment rooms, dental care, administration).

Community services (physiotherapy, podiatry, shared office space, group rooms).

Common consultancy (consultancy and counselling rooms).

Community Diagnostic Centres (CDC) (consultation rooms, echocardiology, phlebotomy)

Shared facilities (WC, showers, stores, seminar rooms).

An additional 80 sqm modular diagnostic unit (MRI) is proposed to be where 9 car parking spaces are currently located. When this is in place, this will reduce the overall parking provision to 47 car parking spaces. The MRI unit anticipates seeing 30 patients per day.

Overall the site anticipates to have a total of 109 on site staff. It is unclear whether these staff will be in shift patterns, and how many will be on site at any one time.

SPG4 Parking Standards outlines requirements for one space per two staff, and four spaces per consulting room, which would equate to 55 car parking spaces for staff and 144 for patients. This would make a total of 199 car parking spaces in line with maximum standards. The proposal outlines the retention of 56 car parking spaces, although this will be reduced to 47 spaces when the MRI unit becomes operational.

TRICS has been interrogated to establish the vehicle trips associated with the current educational use and the proposed health hub. The existing use sees 213 two way trips per day, in comparison to the health hub which anticipates 400 two way trips per day. It should be noted that this does not represent a full breakdown of anticipated trips as the uses outlined above, such as community rooms, seminar spaces and shared offices has not been demonstrated. These uses are likely to generate vehicle trips in their own right. Therefore, I do not consider the TRICS assessment to be a robust assessment.

Para 4.19 of the Transport Statement states that TRICS sites have an average of 1.6 parking spaces per 100 sqm, equating to 51 parking spaces. I question the validity of this data which is clearly so reduced from the parking standards. 1.6 spaces per 100 sqm appears likely to be in regard to a health centre whole and not one offering so many consultant rooms and services.

The proposal is likely to create an additional 95 arrivals and 91 departures during a weekday. I acknowledge a decrease in trips in the AM peak, although it should be noted that Northwood Road and Westwood Road are more or less consistently busy and do not necessarily follow a peak flow pattern.

It is disappointing that Para 5.1 disregards policy requirements for parking standards. 56 spaces is considerably below the requirement of 144 spaces for customers. This does not make any allowance for staff parking, which alone is 55 spaces in line with policy requirements.

The MRI unit removes 9 car parking spaces, and does not provide a waiting room. Therefore, patients are anticipated to wait in their vehicles. With an assumption that 3 vehicles for the unit arrive at once and park at the site, this reduces the overall capacity for 36 consultation rooms and staff to 44.

While it may not be envisaged that ambulances would need to access the site on a daily basis, provision should still be made to ensure that access is available. Disabled parking is required as it is likely a proportion of patients will hold blue badges. However, this will lead to a further loss of parking, which I do not consider acceptable.

The application does not propose sufficient parking, which is severely below parking standards. No indication of staff numbers, shift patterns, and parking arrangements have been provided. The proposed parking would appear to assume that there would be 1 car on site per consulting room at any one time, which clearly would not take place.

The TRICS outputs do not provide a robust assessment due to the number of other uses that are proposed alongside the health facility. These need to be clearly calculated to give a more accurate view of the trip generation.

I do not consider that a travel plan is sufficient to act as a robust mitigation in a locality where private car use is high.

The number of consulting rooms and uses on a constrained site with very limited parking is considered to be excessive.

Unfortunately I am not satisfied with the information submitted, and wish to place an objection on behalf of the local highway authority, and recommend refusal for the following reason(s):

The proposals do not provide adequate vehicle parking facilities within the site and this is likely to lead to vehicles being parked on the highway, to the detriment of highway safety.

COMMENTS

The application is brought before members as an application of significant public interest given that officers are recommending approval of the application with an objection from KCC Highways, and forms a departure to Policy SP05 of the Thanet Local Plan.

Principle

The site lies within the Thanet Reach employment site. Policy SP05 of the Thanet Local Plan allocates the site for business and employment generating uses within uses class B1 (now class E(g)) for business, class B2 for general industrial, and class B8 for storage. The policy also permits education related uses on this site, which is the current lawful use of the site.

Policy E01 of the Thanet Local Plan also supports the employment generating use of this site, supporting uses that fall within use classes B1, B2 and B8 (or equivalent). The policy does provide a process for justifying alternative uses, with a number of criteria listed that would need to be met in order to justify a use falling within an alternative use class. This criteria is as follows:

- (i) It has been demonstrated that the site is no longer suitable or viable for employment purposes following an active and exhaustive marketing process for a minimum of 12 months;
- (ii) The proposal would not undermine economic growth and employment opportunities in the area;
- (iii) The proposal would not result in a significant, or harmful reduction in the supply of land available for employment purposes for the remainder of the plan period, having regard to the type of employment land proposed for reuse and its location;
- (iv) The proposal would not prejudice the ongoing operation of remaining businesses nearby; and
- (v) The proposal would result in a good standard of amenity for existing and future occupants.

Policy BSP11 of the Broadstairs and St Peters neighbourhood plan outlines that the redevelopment of land identified for employment use will only be supported where:

- a) The applicant can demonstrate that the site/premises is no longer capable of meeting employment needs; or
- b) Development of the site for other appropriate uses will facilitate the relocation of an existing business to a more suitable site or where there is no reasonable prospect of the site being used for employment uses ; or
- c) Unacceptable environmental problems are associated with the current use of the site and the proposal will remove them; or
- d) Relocation of the employer will make better use of existing or planned infrastructure

The site as a whole was originally used by Christchurch University for educational use, until its closure in 2018. Part of the site, which included the Carey building and the Allen building (to the rear of the site), was purchased by Nelson College London in May 2022. A supporting statement submitted by the agent has confirmed that the college has run solely from the

Allen building, with a maximum of 240 students, but with the capacity for 400no. students. As such the college has confirmed that the Carey building exceeds their requirements, and they require the sale of the Carey building to fund the continued educational use of the Allen building.

The Carey building has remained empty for 6 years, although it was clear from a site visit that a reception area exists at the ground floor of the building that supports the educational use within the Allen building; and temporary businesses have been operating from the building whilst the future permanent use of the building is determined.

The proposed health facility falls within use class E(e), which is not supported by Policies SP05 or E01 of the Thanet Local Plan, although it is appreciated that the proposed use would generate employment, in addition to a continued community use, which is of benefit.

Consideration has been given to how the proposed use sits against the criteria as set out within Policy E01 for alternative uses, and a further supporting planning statement has been submitted that justifies the proposal against each of the criteria.

(i) It has been demonstrated that the site is no longer suitable or viable for employment purposes following an active and exhaustive marketing process for a minimum of 12 months;

Marketing evidence has been submitted in support of the application to prove that marketing of the building took place following its closure in 2018 until it was sold in 2022, and then again until 2024, prior to the submission of this application. Terence Painter Estate Agents were invited to find a potential buyer from October 2020 onwards, during which time four interested parties were identified, but they did not pursue the purchase of the building. The purchase of the wider site finally took place in 2022 by Nelson College London, however, marketing of the Carey building continued as it was surplus to their requirements. The marketing evidence indicates that there have been eight parties interested in the purchase of the Carey building since 2022, but for numerous reasons the sale of the building has not been pursued. It is worth noting that many of the interested parties would have also required a change of use to a use that fell outside of the uses permitted by the site allocation policy.

The submitted marketing evidence is considered to be sufficient to prove that adequate marketing of the building has taken place to attempt a continued use falling within the equivalent of B1, B2, B8 or educational use. It is worth noting that the proposed use will continue to provide employment, with the updated statement confirming the expectation of 129no. full-time equivalent jobs being provided through the proposed health centre use.

(ii) The proposal would not undermine economic growth and employment opportunities in the area;

The site is centrally located within Thanet, with the proposed use seeking to serve as a health hub for the district. The building has remained empty for a number of years, since 2018, and as the marketing has proven above that the re-use of the building for a continued employment use falling within the site allocation uses hasn't been achievable.

The submitted planning statement states that funding for the proposed use has been secured, making this a viable option for the re-use of the building, and the proposal will bring forward 129 full time equivalent jobs. The supporting statement has considered employment density when comparing the proposed use to permitted uses on the site, with the proposal producing a density of 1 job per 11.6 sq m, identical to the average densities of between 1 job per 10 and 13 sq m for Eg(i) offices, and more favourable than the densities for general industrial (B2) and storage (B8) uses, of 1 job per 36 and 81 sq m, respectively.

(iii) The proposal would not result in a significant, or harmful reduction in the supply of land available for employment purposes for the remainder of the plan period, having regard to the type of employment land proposed for reuse and its location;

The submitted planning statement justifies the loss of employment land on the grounds that the Employment Land Review (May 2010) confirmed that in 2008, the total floorspace for B1, B2 and B8 uses was 590,000 sq m. The GIA of the application premises is some 3,702 sqm, which represents just 0.6% of the total amount of floorspace which was available 16 years ago. The planning statement suggests that this total figure will now be lower, given the significant increase in floorspace which have taken place, particularly at Manston Business Park, during this period. The applicant therefore concludes that a change of use of this floorspace will not result in either a significant or harmful reduction in the total quantum of employment floorspace during the plan period.

The proposal will not result in the loss of floorspace for B1, B2 or B8 (or equivalent) use as the lawful use of the building is F1(a), and therefore its loss to an alternative use would not impact employment floorspace generated by B1, B2 or B8 (or equivalent) uses, it is only potential employment generating floorspace that would be lost through the location of the site within a designated area where the number of hectares contribute towards employment land provision.

As such, it is not considered that the proposal would have a significant impact upon land supply for employment, especially given the number of full time equivalent jobs being created through this proposal, as set out above.

(iv) The proposal would not prejudice the ongoing operation of remaining businesses nearby; and

The submitted statement advises that the Carey Building is detached from all surrounding buildings, and there would be very little difference between the operation of the building for the proposed health centre use when compared to its lawful educational use. As such it is not considered that the proposed use would result in any adverse impact upon existing or future businesses nearby.

(v) The proposal would result in a good standard of amenity for existing and future occupants.

The submitted statement confirmed that the building, although vacant, remains in a good state of repair, and will be eminently suited to the proposed, health related uses. The site is

a significant distance from existing neighbouring occupiers to prevent any impact upon amenity.

Overall, is it considered that the proposed use would comply with the criteria as set out within Policy E01 of the Thanet Local Plan, and therefore could be supported as an alternative use that achieves sustainable development under the economic objective of the NPPF.

Furthermore, the proposed health hub facility would be supported in principle by Policy SP40, which supports new medical facilities at Westwood (which this site is on the edge of); Policy SP38, which supports accessible community services and facilities, including new health facilities; and Policy CM01, which permits new/improvements to existing community facilities. For each policy health and community benefits are given great weight, and therefore the proposed health hub, which has objectives (as set out in the planning statement) of supporting the implementation of NHS strategic initiatives, supporting the local care agenda of the East Kent Health and Care Partnership (EKHCP), and delivering significant health and wellbeing benefits for the local population, addressing deprivation, inequalities and poor health outcomes experienced by the residents of Thanet, is considered to fulfill the objectives of these policies, achieving sustainable development under the social objective of the NPPF. This is also supported through the amended NPPF (2024), which has introduced the following line within paragraph 101: 'significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development'.

On balance, given the specific aspects of this site (as a former educational use) and its compliance with the criteria as set out within Policy E01 (and Policy BSP11 of the Broadstairs and St.Peters Neighbourhood Plan), along with the health, community, and employment benefits being offered through the scheme, the proposal is considered to represent an acceptable departure to Policy SP05, whilst complying with Policies E01, SP39, SP40 and CM01 of the Thanet Local Plan, and Policy BSP11 of the Broadstairs and St.Peters Neighbourhood Plan.

Character and Appearance

Policy QD02 of the Local Plan outlines that the primary planning 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. Policy BSP9 of the Broadstairs and St Peters Neighbourhood plan states that development proposals that conserve and enhance the local character and sense of identity of the Plan area will be encouraged.

The proposal does not incorporate any external changes, with the change of use of the building solely requiring the reconfiguration of the internal space to create new consulting rooms etc. The external parking area serving the site will also remain as existing.

The proposal is therefore considered to comply with Policy QD02 of the Thanet Local Plan, Policy BSP9 of the Broadstairs and St.Peters Neighbourhood Plan, and the NPPF.

Living Conditions

Policy QD03 of the Thanet Local Plan requires that all new development be compatible with neighbouring buildings and spaces and not lead to the unacceptable living conditions through overlooking, noise or vibration, light pollution, overshadowing, loss of natural light or sense of enclosure.

There are no physical alterations to the building that could have any affect on neighbouring light, outlook, privacy etc. The only potential impact is noise and disturbance from the proposed use. When comparing an educational use to a health use it is not expected that noise generated would significantly differ. It is possible that the proposed use may have longer opening hours, but the material characteristics of the two uses remain the same. The parking area serving the building is in the same location, and the landscape buffer between the building and the adjacent road, and the residential properties opposite, is being retained.

The impact upon neighbouring occupiers is therefore considered to be acceptable, and in accordance with Policy QD03 of the Thanet Local Plan, and the NPPF.

Transportation

Policy TP06 of the Thanet Local Plan states that 'proposals for development will be expected to make satisfactory provision for the parking of vehicles'.

The NPPF seeks to prioritise sustainable transport modes, provide safe and suitable access to the site for all users, and mitigate to an acceptable degree any significant impact from the development on the transport network.

The application is for the change of use of a single building within an overall site that accommodates a mix of different uses, including the Allen building in educational use, the innovation centre in business use, and a window/door manufacturers. A shared parking area is present between the units, with individual spaces allocated to each of the units. The spaces allocated to this unit are close to Westwood Road, and it has been noted when visiting the site that the carpark is being used as a drop off/collection point for parents of children at St.Georges Primary School. The primary school was approved with a drop off point within the school grounds in order to negate the need to find parking provision close to the school. KCC are aware that this drop off system is not currently being used, and are in discussion with the school about its recommencement in order to prevent parking within the application site by parents.

The application has been submitted with the red line of the application site extending around 59no. parking spaces within the car park. A transport statement has been submitted with the application. The statement confirms that there would be 36no. consulting rooms within the building, along with various other elements including treatment rooms, counselling rooms, office space, and a diagnostic centre. The total number of staff expected on site at any one time was originally identified within the statement as 109.

It was also initially proposed that a MRI diagnostic unit would be placed within the car park area, which would operate 7 days a week, with 30 patients expected per day. The MRI unit was located in an area of existing parking, resulting in the loss of 9no. spaces, reducing the overall number of parking spaces to 50, which the statement still concludes is acceptable.

The transport statement identifies a need for a maximum of 199no. parking spaces, yet only 50no. spaces exist. The statement concludes that this is acceptable as the existing provision falls below the maximum requirements. In addition, a car parking accumulation forecast table has been produced (based upon a similar scenario), which predicts that no more than 27no. vehicles will be needing to park at any one time, which the existing carpark can accommodate.

In terms of trip generation, the trip generation for the existing educational use of the building has been calculated using the 3,231sqm of floor area, and a comparison with comparable sites. To calculate the trip generation potential of the proposed Healthcare Building, an assessment utilising the TRICS (Trip Rate Information Computer System) database under sub-category 05/E Health Clinic has been used. The assessment concludes that the existing educational use is predicated to generate 213 total two-way vehicle trips on a typical weekday. In comparison, the transport statement predicts that the proposed health hub use would generate 400 total two-way vehicle trips. The statement concludes that this increase is acceptable as the number of vehicle movements during the morning peak from 07:00 - 09:00 is expected to decrease.

KCC Highways has been consulted and has advised that Westwood Road to the north of the site is considered to be one of the busiest roads in Thanet at this time, with Northwood Road to the east often busy with parked cars.

When considering the TRICS data, KCC has raised concerns that this does not represent a full breakdown of anticipated trips as the uses outlined, such as community rooms, seminar spaces and shared offices have not been demonstrated. These uses are likely to generate vehicle trips in their own right, and therefore KCC does not consider the TRICS assessment to represent a robust assessment.

KCC Highways have further raised concerns with the TRICS data used, with paragraph 4.19 of the Transport Statement stating that the TRICS data shows healthcare TRICS sites have an average of 1.6 parking spaces per 100sqm, which for this site would indicate a parking requirement of 51no. parking spaces. KCC has queried the validity of this data which is significantly reduced from that which would be sought under KCCs parking standards. KCC has suggested that this comparison is more likely to be in regards to a health centre that does not offer so many consultant rooms and services. The proposal is likely to create an additional 95 arrivals and 91 departures during a weekday, and whilst it is acknowledged that a decrease in trips is expected in the AM peak, KCC advise that Northwood Road and Westwood Road are more or less consistently busy and do not necessarily follow a peak flow pattern. Furthermore, consideration has not been given to the other uses within the overall site when considering the TRICs data, and the cumulative impact of this.

KCC raised concerns with the lack of parking provided, and advised that 56 spaces falls considerably below the requirement of 144 spaces for patients, whilst not making any allowance for staff parking, which alone is 55 spaces in line with policy requirements.

The MRI unit to be located within the carpark removes nine of the existing 59no. car parking spaces, and does not provide a waiting room. Therefore, patients are anticipated to wait in their vehicles, with an assumption that 3no. vehicles for the unit will arrive at once and park at the site, which reduces the overall parking capacity for 36 consultation rooms and staff to 44.

In addition, KCC advised that provision should be made for ambulances to ensure that access is available, further consideration should be given to disabled parking as a large proportion of patients will hold blue badges (although this would lead to a reduction of parking due to the width required), and further information should be provided on staff numbers, shift patterns, and parking arrangements have been provided.

A revised transport statement was submitted, which attempted to address the concerns raised by KCC. The updated trip generation assessment has been based on a floor area that removes the plant room, building services, lift and stairwell from the calculations, therefore resulting in a slight reduction in the total two-way vehicle movements per day to 392 (from 400). Whilst eight comparable sites have been used through the TRICS within the transport statement, KCC has advised that none of the sites used are actually comparable, being located in either residential areas where there is more on street parking capacity, or where staff numbers are much lower. KCC has highlighted a more appropriate comparison in Cambridgeshire where a 1,046sqm facility is provided with 45 staff, resulting in 4.3 spaces per 100sqm (exceeding the 1.6 average parking spaces proposed). This again suggests the need for greater on site parking provision.

Further information has been provided within the transport statement on the expected staff shift patterns, with 129no. staff expected (an increase to the 109no. staff previously stated). Of these, five are clinical staff and six are admin staff working 08:30-17:00, eighteen are linked to the MRI, and nineteen are linked to the dental. Of the remaining 81no. Kent Community Health staff, 68no. will be mobile, accessing the site once in the morning, and returning again in the afternoon. KCC raised concern that there is insufficient parking provision to accommodate the 68no. mobile staff, in addition to the permanent on site staff and patients.

Tracking plans were submitted to prove that an ambulance could enter and leave the site in a forward gear (based upon a 7.5t panel van, which is an equivalent size). The tracking plans are considered to be acceptable.

In response to KCC's comments a further and final transport statement has been submitted, along with a 'Highway's Response'. The first change noted is the removal of the mobile diagnostic unit from the carpark, which enables the full 59no. existing parking spaces to be retained within the site (including 3no. disabled parking spaces).

When considering the application site the floor area has been split, with 328sqm forming the GP, and the remainder forming the clinics and dental use. The GP has a higher trip rate than

the clinics, with the proposal now expecting to generate an additional 148no. vehicles arriving and 141no. vehicles departing the site per day (when compared to the existing educational use). The total two way vehicle trip movements for the proposed use is therefore now identified as 508 (compared to the 400 and 392 two-way trip movements previously identified); however, the statement concludes that in the transport consultant's view, despite the increase in trip numbers, the car park has the capacity for the expected demand for parking. KCC, in response to this, is of the view that this increase in movements will have a severe impact on the local highway network in this location.

Based upon the floor area as it is intended to be configured (which continues to include 36no. consulting rooms), a maximum of 208 parking spaces are outlined for a development of this scale (one space per two staff (64no. spaces), and 4 spaces per consulting room (144no. spaces)). The policy requirement accounts for the inevitable overlap of arrivals and departures, and delays across the day. The proposal continues to offer only 59no. parking spaces (including 3no.disabled spaces), with no external space available to achieve any additional spaces (the other spaces within the overall site are allocated to the other uses within the site, and cannot be reduced).

In response to the parking concerns for the 68no. mobile staff, the submitted transport statement advises that the staff will be staggered when entering the site, with a maximum of 25no. members of staff on site at any one time, which can be accommodated within the site. KCC has advised that even without the 68no. mobile staff, there would be 61no. other staff members on site during operating hours, and if only half of these staff members drove to site there would still be a demand for 30no. parking spaces within the site for staff, in addition to the 144no. spaces required for patients. Whilst the site is an edge of town centre site where maximum parking standards apply, in this instance, given the location of the site adjacent to two highly congested roads, KCC do not consider that parking requirements should be relaxed lower than 75% of the maximum requirements, meaning that 108no. spaces for patients should be provided, significantly higher than the overall 59no. spaces available on site, and the 29no. spaces or less available once staff have parked. KCC Highways has advised that without sufficient parking, the application is likely to lead to inconsiderate, haphazard and illegal parking in the locality, to the detriment of highway safety.

The submission of a travel plan would help to mitigate the harm by encouraging the use of sustainable modes of transport. A travel plan strategy has been submitted with this application, but it is in basic form and KCC Highways are of the view that the travel plan as submitted is not robust enough to represent a modal shift of the scale required for this application. KCC has therefore recommended that should the application be approved that the submission of a travel plan be secured either via condition or legal agreement, along with a financial contribution of £1,422 to KCC as a monitoring fee for the auditing of the travel plan in years 0, 1, 3 and 5.

KCC has advised that the travel plan should include:

- an 'Action Plan' and 'Measures' to encourage modal share and other interventions to encourage alternative forms of transport;

- The requirement for staff and visitor questionnaires to monitor travel patterns;

- More information on walking and cycling, including PROQ and Cycle Map routes to see what is available in the surrounding area;

More information on bus and rail stops, routes, destinations and frequencies;
Information on car sharing websites;
Details of the cycle parking and how these will be provided;
Proposed management of on site parking, including staff, visitor and electric vehicle charging point spaces;
Details of available off-site parking provision for staff and how this would be managed.

The applicant has agreed for the submission of the travel plan and financial contribution towards the travel plan monitoring to be secured obligations within a unilateral undertaking, requiring submission prior to first use, which complies with Policy TP01 of the Thanet Local Plan, and paragraph 118 of the NPPF.

When considering alternative forms of transport, there is a bus route along Westwood Road to the north of the site, with the most recent timetable update indicating that route 34 would connect the site to both Dane Valley and Margate town centre to the north/east, and Newington, St.Lawrence and Ramsgate town centre to the south. As part of the travel plan requirements the applicant is intending to discuss the site with the local bus services to determine how improved accessibility to the site can be achieved by bus. Currently bus stops are present on Westwood Road outside the Carey building, and on the opposite side of the road, which is a good location for good accessibility to the proposed health facility.

Cycle parking is present within the site, with a covered cycle shelter located next to the Carey building, which on the site plan is annotated as containing 80no. cycle parking spaces, although the shelter is likely to serve more than just the Carey building. The proposal generates the need for 18no. cycle parking spaces that can be accommodated within the existing shelter. Although the transport statement suggests that improvements to the shelter are required, recent photos of the site suggest that a new roof covering to the shelter has recently been provided so they are now in adequate condition.

The site contains no existing electric vehicle charging points. The proposal would generate the need for 5no. electric vehicle charging points, which is likely to be more usable by staff than patients given the limited length of appointments. The applicant has agreed to the provision of the electric vehicle charging points, although it is appreciated that if the spaces were made available solely for electric vehicles, there's a chance that these spaces would not be used continuously throughout the day. As such, the management of the electric vehicle charging points would be required, with a potential booking system in place that allowed for general use of the spaces when not required by electric vehicles.

Whilst there is no opportunity for additional parking within the overall site, there is the opportunity for staff to park within the town centre and walk to the site. Broadstairs Retail Park currently has unrestricted parking and spare capacity, so there may be the opportunity through a management plan to encourage staff to park off site, providing greater capacity for patients on site. In addition to this, KCC has encouraged the submission of a parking management plan that considers staff schedules and shift patterns in order to minimise the number of staff present at the site at any one time, particularly the mobile community workers, in order to maximise on site parking for patients. A safeguarding condition will require the submission of the parking management plan prior to first use, which the applicant has agreed to.

Paragraph 116 of the NPPF states that 'development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios'.

Based on the information submitted, KCC Highways are of the view that the application should be refused on highway safety grounds due to the lack of suitable on site parking to serve both staff and patients of the proposed development, the result of which is likely to lead to inconsiderate, haphazard and illegal parking in the locality, contrary to Policy TP06 of the Thanet Local Plan, and paragraph 116 of the NPPF. However, the applicant has agreed to the submission of a legal agreement that will secure the provision of a travel plan with a parking management plan secured through condition, the aims of which are to reduce the reliance upon the car when accessing the site by encouraging alternative sustainable forms of transport, whilst also limiting the number of staff required to access the site at any one time. This will provide some mitigation measures towards reducing the impact upon highway safety, although in the view of KCC Highways, this is not likely to be sufficient to overcome the wider harm to the highway network and the free flow of traffic resulting from this proposed development, along with the potential harm to pedestrians from the crossing (from their parking location) of extremely busy major distributor roads where there are less than desirable crossing points.

Therefore the proposal will result in harm to the highway network, which must be weighed in the overall determination of the proposal against the policy framework and NPPF.

Biodiversity

The site is positioned in an urban location and this proposal is for a change of use only and would not alter the footprint of the existing building.

Biodiversity net gain (BNG) is an approach that aims to leave the natural environment in a measurably better state than it was beforehand. This excludes applications for Listed Building Consent, Advert Consent, Reserved Matters, Prior Approvals, Lawful Development Certificates, householders, self builds, and other types of application which fall below the threshold i.e. does not impact a priority habitat and impacts less than 25 sq.m of habitat, or 5m of linear habitats such as hedgerow). This site is below the priority habitat threshold and therefore this development is considered to be exempt from Biodiversity Net Gain.

It is therefore considered that this proposal would not result in any significant harm to biodiversity in the area, and would comply with Policy SP30 of the Thanet Local Plan, and the NPPF.

Conclusion

The proposed health hub facility would be supported in principle by Policy SP40 of the Thanet Local Plan, which supports new medical facilities at Westwood; Policy SP38, which supports accessible community services and facilities, including new health facilities; and Policy CM01, which permits new/improvements to existing community facilities. For each

policy health and community benefits are given great weight, and therefore the proposed health hub, which has objectives (as set out in the planning statement) of supporting the implementation of NHS strategic initiatives, supporting the local care agenda of the East Kent Health and Care Partnership (EKHCP), and delivering significant health and wellbeing benefits for the local population, addressing deprivation, inequalities and poor health outcomes experienced by the residents of Thanet, is considered to fulfill the objectives of these policies, achieving sustainable development under the social objective of the NPPF. This is also supported through the amended NPPF (2024), which has introduced the following line within paragraph 101: 'significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development'.

Whilst the proposal is located on an allocated employment site, the proposal complies with the criteria as set out within Policy E01 of the Thanet Local Plan for alternative uses. As such given the specific aspects of this site (as a former educational use) and its compliance with the criteria as set out within Policy E01 (and Policy BSP11 of the Broadstairs and St.Peters Neighbourhood Plan), along with the health, community, and employment benefits being offered through the scheme, the proposal is considered to represent an acceptable departure to Policy SP05, whilst complying with Policies E01, SP39, SP40 and CM01 of the Thanet Local Plan, and Policy BSP11 of the Broadstairs and St.Peters Neighbourhood Plan.

The proposal is for a change of use only, with no external alternations, and therefore the impact upon both visual impact and neighbouring living conditions is considered to be acceptable.

When considering the impact upon highway safety, concern has been raised that the proposed use will result in a significantly higher trip generation than the existing use (508no. two-way trip movements compared to the existing 213), with only 59no. parking spaces provided on site; whilst the parking demand equates to approximately 208no. parking spaces (based upon 36no. consulting rooms and 129no. members of staff). No additional parking spaces within the site can be achieved, and the number of consultancy rooms cannot be reduced without affecting the viability of the health hub facility. KCC Highways have objected to the application on the grounds that the lack of on-site parking will result in harm to the wider highway network and highway safety due to increased inconsiderate, haphazard and illegal parking in the locality, which will affect the free flow of traffic, contrary to Policy TP06 of the Thanet Local Plan and paragraph 116 of the NPPF.

The significant community/health benefits/public infrastructure being offered through this proposal need to be balanced against the highway harm when determining this application. Consideration also needs to be given to the proposed highway mitigation measures as set out above, which include the submission of a travel plan and parking management plan, and the securing of a travel plan monitoring fee, the aims of which are to reduce the reliance upon the car when accessing the site by encouraging alternative sustainable forms of transport, whilst also limiting the number of staff required to access the site at any one time.

Whilst KCC Highways are of the view that these mitigation measures will not be sufficient to overcome the wider harm to the highway network, this is on the basis of the current submitted information, but there is the opportunity for improvements to be made to the bus

route to improve accessibility by bus, along with numerous other interventions, such as car sharing, the promotion of a 'cycle to work' scheme, and electric vehicle car pooling, with full details to form part of a more detailed travel plan strategy submission. There is also the opportunity for off-site parking locations within the town centre to be identified for staff, from which they can walk to the health hub facility, to reduce the need for on site parking.

Given the mitigation measures that have been secured, and the support that has been received for this proposal, including that of Broadstairs and St Peters Town Council, it is considered that the significant health and community benefits being offered through this health hub facility (along with its central location within the district, and sustainable edge of town centre position), would, on balance, outweigh the harm to highway safety in this instance.

It is therefore recommended that members defer and delegate the application for approval subject to safeguarding conditions, and the submission of a signed legal agreement (within 6 months) securing the obligations as set out above relating to the travel plan and its monitoring.

Case Officer

Emma Fibbens

TITLE:

F/TH/24/1229

Project

Nelson College London Carey Building And Surrounding Land Northwood Road Broadstairs Kent

