



Agenda

Meeting: **Planning and Licensing Committee**
Date: **3 April 2018**
Time: **7.00 pm**
Place: **Council Chamber - Civic Centre, Folkestone**

To: **All members of the Planning and Licensing Committee**

The committee will consider the matters, listed below, at the date, time and place shown above. The meeting will be open to the press and public.

Members of the committee, who wish to have information on any matter arising on the agenda, which is not fully covered in these papers, are requested to give notice, prior to the meeting, to the Chairman or appropriate officer.

5. Report of the Head of Planning

*Explanations as to different levels of interest

(a) A member with a disclosable pecuniary interest (DPI) must declare the nature as well as the existence of any such interest and the agenda item(s) to which it relates must be stated. A member who declares a DPI in relation to any item must leave the meeting for that item (unless a relevant dispensation has been granted).

(b) A member with an other significant interest (OSI) under the local code of conduct relating to items on this agenda must declare the nature as well as the existence of any such interest and the agenda item(s) to which it relates must be stated. A member who declares an OSI in relation to any item will need to remove him/herself to the public gallery before the debate and not vote on that item (unless a relevant dispensation has been granted). However, prior to leaving, the member may address the meeting in the same way that a member of the public may do so.

(c) Members may make voluntary announcements of other interests which are not required to be disclosed under (a) and (b). These are announcements made for transparency reasons alone, such as:

- membership of outside bodies that have made representations on agenda items, or
- where a member knows a person involved, but does not have a close association with that person, or
- where an item would affect the well-being of a member, relative, close associate, employer, etc. but not his/her financial position.

Voluntary announcements do not prevent the member from participating or voting on the relevant item

Queries about the agenda? Need a different format?

Contact Kate Clark – Tel: 01303 853267
Email: committee@shepway.gov.uk or download from our website
www.shepway.gov.uk

This page is intentionally left blank

PLANNING AND LICENSING COMMITTEE

3 April 2018

SUPPLEMENTARY INFORMATION TO SCHEDULE OF APPLICATIONS

**1. Y17/1099/SH
(Page 47)**

**Former Rotunda Amusement Park Marine Parade
Folkestone Kent**

Section 73 application for removal of conditions 41 (Provision of Sea Sports Centre) and 42 (Provision of Beach Sports Centre) and for the variation of conditions 4 (Reserved Matters), 6 (Phasing), 7 (Reserved Matters Details), 15 (Public Realm), 16 (Play Space/ Amenity Facilities), 18 (Public Toilets), 21 (Wind Flow Mitigation), 23 (Heritage Assets), 25 (Bus Stop) and 37 (Wave Wall) of planning permission Y12/0897/SH (Outline planning application with all matters (access, scale, layout, appearance, landscaping) reserved for the redevelopment of the harbour and seafront to provide a comprehensive mixed use development comprising up to 1000 dwellings (C3), up to 10,000 square metres of commercial floorspace including A1, A3, A4, A5, B1, D1 and D2 uses as well as seasports and beach sports facilities. Improvements to the beaches, pedestrian and cycle routes and accessibility into, within and out of the seafront and harbour, together with associated parking, accompanied by an Environmental Statement) to enable changes to the plot shapes, footprints, maximum height, changes to parameter plans, levels, parking arrangements, and alterations to the Environmental Statement.

Mr Hourahane, local resident, to speak on application
Cllr Mrs Lawes, ward member, to speak on the application
Cllr Mrs Wallace, ward member, to speak on the application
Trevor Minter, applicant, to speak on application

**2. Y16/1122/SH
(Page 3)**

Land Rear Rhodes House Main Road Sellindge Kent

Outline planning application for a neighbourhood extension for the creation of up to 162 houses including affordable, self-build and retirement housing, up to 929 square metres Class B1 Business floorspace, allotments, recreational ground and multi-use games area, nature reserve, and associated access, parking, amenity space and landscaping.

Bob Edden, local resident, to speak on application
Cllr Miss Carey, ward member, to speak on application
Mr Mark Quinn, applicant's agent, to speak on application

Amended Plans

Amended drawings of the Parameter Plans and Illustrative Plans have been submitted which remove Plot L from the drawings and also clarify the uses which could take place on each Plot. The plans include the following:

Parameter Plan 1 - Planning Application Boundary Rev: B.
Parameter Plan 2 - Buildings Retained/Demolished Rev: A.
Parameter Plan 3 - Plot key and Setting Out Rev: B.
Parameter Plan 4 - Site Access Rev: B.
Parameter Plan 5 - Public Realm Rev: B.
Parameter Plan 6 - Existing and Proposed Site Levels Rev: B.
Parameter Plan 7 - Minimum/Maximum Development Rev: B.
Parameter Plan 8 - Ground Floor Horizontal Deviation Rev: B.

Illustrative Plan A – Names and Places Rev: A
Illustrative Plan B – Transport Rev: A
Illustrative Plan C – Use Classes Rev: A
Illustrative Plan D – Land Ownership Rev: A
Illustrative Plan E – Indicative Phasing Plan Rev: A

Recommended conditions

The conditions which are being varied would read as follows (the remainder would be as on the original approval):

4. The submission of reserved matter applications pursuant to this outline application shall together provide for at least 720 and not more than 1000 dwellings and up to 10,000sqm gross commercial floorspace (A1, A3, A4, A5, 81, D1 and D2 uses) and demonstrate compliance with the following Parameter Plans and the text set out on those Plans to fix the development principles:-

Parameter Plan 1 - Planning Application Boundary Rev: B.
Parameter Plan 2 - Buildings Retained/Demolished Rev: A.
Parameter Plan 3 - Plot key and Setting Out Rev: B.
Parameter Plan 4 - Site Access Rev: B.
Parameter Plan 5 - Public Realm Rev: B.
Parameter Plan 6 - Existing and Proposed Site Levels Rev: B.
Parameter Plan 7 - Minimum/Maximum Development Rev: B.
Parameter Plan 8 - Ground Floor Horizontal Deviation Rev: B.

Together with the mandatory design and specifications set out within the Folkestone Seafront Masterplan Design Guidelines Rev: A 11.01.18 and Folkestone Seafront Landscape Guidelines Rev: 2 - 11.01.2018 and Supplementary Information.

Reason:

To determine the scope of this permission in accordance with the submitted documents, to meet the strategic objectives of the Shepway Core Strategy Local Plan 2013, in order to ensure the delivery of a high quality sustainable new neighbourhood.

6. Unless agreed otherwise with the local planning authority the development shall be carried out in accordance with the approved phasing plan No. E and Folkestone Seafront Landscape Guidelines Rev: 2 - 11.01.2018 and Supplementary Information.

Reason:

In order to ensure the development comes forward in conjunction with appropriate infrastructure and is delivered in accordance with the assumptions considered within the Environmental Statement, in accordance with policies SS5 and SS6 of the Shepway Core Strategy Local Plan 2013 and the NPPF.

7. The reserved matters submitted in accordance with Condition 1 shall include the following details to the extent that they are relevant to the reserved matters application in question:

A. Layout

The layout of routes, buildings and spaces, the block form and organisation of all buildings including the locations and plan form of non-residential buildings, the distribution of market and affordable dwellings within that phase including a schedule of dwelling size (by number of bedrooms), the location of dwellings designed to seek to meet the Council's Lifetime Homes guidance (a minimum of 20%), full details of the approach to vehicle parking including the location and layout of adequate residential parking, visitor parking and parking for people with disabilities for each building type together with details of the design approach for access points into, and the ventilation of, any undercroft/underground parking, full details of the approach to residential cycle parking at a ratio of 1 space per bedroom and the approach to commercial and visitor parking strategy including the location, distribution, types of rack, spacing and any secure or non-secure structures associated with the storage of cycles and the location and form of open areas.

B. Access

The access and circulation of modes of travel within the relevant phase or sub-phase, the design of roads and paths and junction layout including the provision of footpaths and cycleways.

C. Scale and Appearance

Scale, form and appearance of the architecture within each phase in accordance with the mandatory parameter and design guidelines, including frontage design and public/private realm definition and boundary treatments

D. Public Open Spaces Public Realm Design Strategy

The extent, layout and specification of public open spaces, in accordance with the mandatory Folkestone Seafront Landscape Guidelines Rev: 2 - 11.01.2018 and Supplementary Information and including details of street furniture (including lighting, seating, signage, bus stops, bins surface treatments, threshold levels) and play space and delivery of Marine Parade, accompanied by a management plan showing how the relevant areas of public open space are to be laid out, paved, planted, equipped and maintained together with a timetable for their implementation.

E. Landscaping

The landscape design and specification of hard and soft landscape works within each phase in accordance with the mandatory Folkestone Seafront Landscape Guidelines Rev: 2 - 11.01.2018 and Supplementary Information.

F. Playspace

The amount and location of play space including:

- a) A plot specific play space strategy including details of the play equipment proposed
- b) An overarching play space strategy which should have regard to the play space provision within preceding plots and proceeding plots as appropriate.

Reason:

In order to ensure the development delivers development of the quality envisaged in the illustrative masterplan as required by the mandatory design guidelines, in accordance with saved policies TR5, TR11 and TR12 of the Local Plan Review, policy SS6 of the Shepway Core Strategy Local Plan 2013 and the NPPF.

15. The reserved matters submitted in relation to any development to east of harbour approach road/phase 5 as shown on illustrative Plan E shall include the retention of the public realm improvements to the Harbour Viaduct and Harbour Arm already completed and include measures to ensure these are accessible to the public to the reasonable satisfaction of the Local Planning Authority prior to the occupation of any dwellings within plot PH01/Phase 6.

Reason:

In order to ensure the delivery of appropriate open space and public realm to serve the development and deliver the identified public realm improvements to the harbour as required by policy SS6 of the Shepway Core Strategy Local Plan 2013.

16. The reserved matters submission for phase 6/plot G1 shall include play space and communally accessible amenity facilities (eating areas, tables, seating etc) within the communal gardens, inclusive of details of opening hours to residents and the public.

Reason:

In order to ensure the provision of adequate open, amenity and play space in accordance with saved policies LR9 and LR10 of the Local Plan Review and policy SS6 of the Core Strategy Local Plan.

18. Reserved matters application submitted in relation to Plot A shall include details of publically accessible toilets, inclusive of details for their long term management and maintenance.

Reason:

In order to ensure the provision of adequate facilities in accordance with policies SS5 and SS6 of the Shepway Core Strategy Local Plan 2013.

21. The reserved matters submitted in accordance with Condition 1 for phase 6/plot G1 shall include mitigation measures to reduce the impact of wind flow downwash. Such measures shall include Computational Fluid Dynamics (FD) assessment of wind effects once massing has been designed and include evidence to demonstrate how the results of the assessment have informed the detailed design of the proposed development.

Reason:

In order to minimise wind flow downwash in the interests of the amenity of residents in accordance with the development mitigation measures set out within the approved ES addendum dated 24th April 2013.

23. Prior to the commencement of development in phases 5 and 6 details of protection measures for the retained heritage assets as shown on parameter plan 2 shall be submitted to and approved in writing by the Local Planning Authority. Such measures shall be implemented in accordance with the agreed schedule.

Reason:

To protect the identified heritage assets and ensure that heritage is appropriately incorporated in to the development, in accordance with the NPPF, Shepway Core Strategy 2013 policy SS6 and retained local plan policies SD1 and BE5.

25. Prior to the occupation of phase 2 details of and a timetable for the provision of a new bus stop shall be submitted to and approved in writing by the Local Planning Authority.

Reason:

In order to appropriately mitigate the impact of the development on the local highway network and ensure public transport is accessible to the residents of the properties hereby approved, in accordance with policies SD1, TR11 and TR12 of the saved Local Plan, policy SS5 of the Shepway Core Strategy Local Plan 2013 and the NPPF.

37. Development within phase 6 hereby permitted shall not be commenced until such time as a detailed design of the proposed wave wall on the Southern Quay has been submitted to, and approved in writing by, the Local Planning Authority. The wave wall shall be constructed in accordance with the approved design to the reasonable satisfaction of the Local Planning Authority prior to the first occupation of Phase 6 unless an alternative timetable is agreed, in writing, by the Local Planning Authority. The wave wall shall be thereafter maintained in accordance with the approved details or as otherwise agreed, in writing, by the Local Planning Authority.

Reason:

To reduce flood risk to the proposed development and to ensure the long term management and maintenance of flood defence infrastructure in accordance with policy SS5 of the Shepway Core Strategy Local Plan and the NPPF.

Any details pursuant to the conditions which have previously been approved would not need to be resubmitted, unless details have changed as a result of the Section 73 application.

In addition to the changes to the original conditions the following additional conditions are recommended

1. Harbour Master's House shall not be demolished until the reserved matters applications for phases 5 and 6 of the development as shown on Illustrative Plan E Rev: B have been approved by the Local Planning Authority.

Reason:

To ensure that every opportunity has been explored for the retention of the non-designated historic asset or to ensure that a high quality development would proceed in its place in accordance with paragraphs 135 and 136 of the National Planning policy Framework.

2. Details of the improvements to Station Square shall be submitted to and approved in writing by the Local planning Authority and shall include details of implementation and timings. No above ground development works on phases 5 and 6, as shown on Illustrative Plan E Rev: B, shall commence until such details have been approved.

Reason:

In order to ensure the development delivers development of the quality envisaged in the illustrative masterplan as required by the mandatory design guidelines, in accordance with, saved policies TR5, TR11 and TR12 of the Local Plan Review, policy SS6 of the Shepway Core Strategy Local Plan 2013 and the NPPF.

REPRESENTATIONS

One additional letter of objection has been received although no additional issues have been raised. The issues related to the height of the building and affordable housing, both of which were covered in the main report.

CONSULTATIONS

Comments of the Conservation Consultant have now been received and these have been attached in Appendix A.

2. Y16/1122/SH (Page 3)

Land Rear Rhodes House Main Road Sellindge Kent

Outline planning application for a neighbourhood extension for the creation of up to 162 houses including affordable, self-build and retirement housing, up to 929 square metres Class B1 Business floorspace, allotments, recreational ground and multi-use games area, nature reserve, and associated access, parking, amenity space and landscaping.

CONSULTATIONS

Sellindge Parish Council: Comments received 09/03/18, questioning the consultation procedure for this application, access arrangements and whether the development has taken in to account the Elec Link route currently under construction.

COMMENT

Statutory consultation has taken place in accordance with regulations, with much of the concern raised by the parish council relating to a lack of discussion relating to the proposals directly with the applicant. Site Notices were displayed near to the site and a Press Notice was placed in a local paper to advertise the application as a Major Development and as a Departure from the Local Plan, with the application also published on the Council's website weekly list. Neighbour letters were posted on 20/10/16 as well as to all relevant Consultees.

Following the receipt of comments from Consultees, such as from KCC Highways & Transportation, Contamination Consultants, KCC Archaeology, KCC Education & Economic Development, additional or amended information was submitted to address each of their comments and the relevant Consultees reconsulted. However,

as the fundamental areas of the application and the development itself remained unchanged, and the proposed changes were not significant, a full public reconsultation was not considered to be necessary. The additional information provided, as well as the responses of consultees are set out within the report.

In response to the objection from KCC Education the applicant has identified a parcel of land to the rear (north) of the existing Sellindge Primary School that could be provided to KCC to facilitate the expansion of the school to mitigate the lack of places currently available. Any proposals for the expansion of Sellindge Primary School will require a separate planning application, providing the appropriate opportunity for the consideration of this matter by the local community.

Officers have confirmed to Sellindge PC that the development has been designed to accord with the route of the Elec-Link, as identified within the Screening Opinion Y17/0007/SCR for the project.

REPRESENTATIONS

Six additional objections have been received since the committee report was published. These objections are on the following grounds:

- Access from Homelands Close would increase traffic and noise pollution.
- Doctor's surgery and local school will not be able to cope.
- Further development not appropriate for a village.
- Access near the bridge and traffic lights will cause congestion and problems.
- Houses in Leafield, Forge Close and Whitehall Way will be overlooked and would experience light pollution.
- NPPF does not support building on grade 1, 2, 3a agricultural land unless avoidable, which this development is.
- Development would cause flooding issues on site and at Grove Bridge. The culvert under the M20 will not cope with increased surface water.
- Health and safety concerns with houses being built in close proximity to the Pylons.
- The public footpath will be lost.
- Badgers and hedgehogs on site, their habitats must be protected.
- A large oil spill on the adjacent site.
- Countryside development outside the defined built settlement.
- Potential impact to Gibbons Brook, a SSSI and only 200m away.
- A20 already very busy, this would create increased congestion.
- Entrance is only 80m away from the Taylor Wimpey development where a zebra crossing has already been agreed.
- Does not add to the physical cohesion of the village.
- The site is not in the Shepway Core Strategy Plan and the next plan is not yet prepared.
- Development would diminish wildlife and clean air space.

LOCAL FINANCE CONSIDERATIONS

The New Homes Bonus Scheme provides for money to be paid to the Council when new homes are built within the district. Under the scheme the Government matches the council tax raised from new homes. Initially this was for a period covering the first 6 years, but has been reduced to 4 years for new additions as a result of the Government's response to the recent consultation on the New Homes Bonus

scheme (Dec 2016) As such only a 4 year value for the New Homes Bonus has been calculated. In this case, an estimated value of the New Homes Bonus as a result of the proposed development would be £219,880 (includes £13,720 Affordable Homes premium) for one year and £879,520 for 4 years (includes £54,880 Affordable Homes premium) and calculated on the basis of council tax Band D average dwellings. The consultation response also changed the methodology for assessing further New Homes Bonus monies for authorities. In summary, the basic calculation has remained the same, but a 0.4% threshold has been introduced, meaning that if an authority records an overall increase in new homes in any one year, but this increase is below the threshold, the authority will not receive any New Homes Bonus funding relating to that particular year. This is a significant change, and amongst other things, it means that estimated New Homes Bonus payments for any specific future development is not guaranteed funding. New Homes Bonus payments are not a material consideration in the determination of this application.

Appendix A – Conservation Consultant’s Comments - attached

Appendix A

Shepway District Council

Conservation Consultancy Advice:

290	Case ref. no:	Y17/1099/SH
Property Address:	Former Rotunda Amusement Park, Marine Parade, Folkestone	
Proposals:	Section 73 application for removal of conditions 41 (Provision of Sea Sports Centre) and 42 (Provision of Beach Sports Centre) and for the Variation of Conditions 4, 6, 7, 15, 16, 18, 21, 23, 25 and 37 of planning Permission Y12/0897/SH	
Application Type	Removal and Variation of Conditions	
Agent:		
General Comments Operative Conditions?		
Listing / C/A?	Site of Gardens south side of Marine Parade - Conservation Area. Houses north side of Marine Parade and Marine Crescent - Grade II; Lighthouse and assoc room – Grade II. Leas Lift - Grade II *	
Date Consult Received:	31/01/2018	
Date Comments Sent:		

Comments:

Historic Building Description and Significance:

The site area is approx. 23 Ha. including all of the foreshore to the south of *Marine Parade*, an area formally occupied by the *Rotunda Amusement Park*, extending from the Leas Park (Marine Walk) in the west as far as the Harbour in the east and including the western harbour arm - a distance of approximately 800m.

The area under the cliff and to the west of the harbour has seen immense changes over the last century and a half. The 1871 map shows the line of Marine Drive extending west from the harbour to connect with Lower Sandgate Road. This area to the west, below The Leas, was landscaped by Lord Radnor and controlled – a toll road with toll houses (the western one still exists). This road now forms the basis of the Lower Leas Park that was re-landscaped by Shepway District Council from 1999.

At the time of the 1871 map, development was proceeding in the area and the map shows Marine Crescent under construction and terraces of houses facing Lower Sandgate Road, Marine Parade and Sandgate Terrace. South of Marine Parade was only the wide shingle beach. The Harbour Station was, at this time, only a short covered terminus building attached to the west side of the much larger Customs House

By 1897, Marine Gardens, a long thin trapezoidal area of planting with walks, had been laid out between Marine Parade and the beach and the Harbour Station replaced by a much longer station shed on a curved alignment, with the tracks continuing on through towards the newly extended harbour arm. From here there was a web of sidings, on the east side connecting to a large goods warehouse and also extending to the west out onto the beach with sidings and further station buildings, presumably goods sheds of some sort, all enclosed within a fenced compound.

By 1907 the curve of the Harbour Station had been further extended to the south-east and with new frontage buildings on its west side facing out onto a new station forecourt yard between the station and the large enclosed yard to the west of it. The Harbour House had appeared by then, a free-standing building located at the north-west end of the station, facing west towards Marine Parade.

The area at the south end of the swing bridge was, by this time very congested, with wagon turntables for tracks leading east along the South Quayside and a further goods shed on the west side, at the head of the station (now demolished) and also a footbridge crossing the main tracks right next to the swing bridge. The sidings area to the east of the station had become much intensified but buildings in the west goods yard, on the former beach area had disappeared by this time, leaving only sidings on the site

By 1929, The station had been vastly extended in length, southwards onto the harbour arm with further buildings straddling the tracks at that end - the arrangement that to a certain extent still exists today. The network of sidings to the south of the main goods warehouse had been further intensified with more sidings on the station site and with various smaller service buildings erected there. In addition, five long sidings had appeared south of the west goods yard, extending further along the beach, presumably built as a part of the logistical arrangement for World War I.

To the west, The Marine Gardens Pavilion had been constructed at the eastern end of the Marine Gardens and the land south of, and between Marine Gardens and the long sidings had by that time also been developed as a recreation area with boating and swimming pools and the Rotunda, a circular building that survived into modern times. By the 1960s the area had become the Rotunda amusement park which finally closed down in 2003.

The current Bing aerial view still shows the remnants of the amusement park with the rather degraded Marine Gardens still surviving alongside Marine Drive. The circular ground plan of the Rotunda, the 1922 scenic railway and other derelict buildings can be seen in this view together with a second circular building – The Dome amusement centre located right opposite Marine Crescent. The area of the former station is also discernible and now the Council's harbour carpark.

All this has now been cleared away and FHC has now landscaped the entire area as a rolling shingle beach, with a boardwalk path linking the Marine Walk (along the seawall to the west) and crossing the landscaped area to connect with a slipway ramp that slopes up to the harbour arm to the east.

Development Proposals:

Application for minor material amendments to the previously submitted scheme. (Saville's letter of 31/08/17 explains). Changes include:

- Part of Plot A is noted as maximum height overall with a pop up
- Increases to the maximum height of block B
- Increases to the maximum height of the 'bookmark ends of block C1. F1 and H
- Increases to the maximum height of blocks F1 and block H but with a reduced footprint to Block H
- Changes to formation levels
- Minor changes to the parameters plan layouts, in particular Block B and C1
- Omit sea sports and beach sports facility
- Changes to the plan layouts including

- Widening of the gap between blocks A and B (at Leas Lift Square)
- Adjustments to regularise the plan layout of Block B
- Reduction in width between Blocks E1 and F1
- Reduction in the footprint to Block H and increased connectivity between Station Square and the Harbour

Changes to the Heritage Assets including:

- Retention and restoration of the Harbour Station as a through pedestrian route
- The demolition of Harbour House to enable a public space and improve access to the restored harbour station

These January 2018 amendments include a whole series of amended and additional reports describing the changes from the originally approved scheme.

These including changes to

The Acme Parameter Plans and Master Plan Guidelines (2018-January 11th-Rev A) which includes more details of the parameters, expressed in a 3-D form together with views of illustrative scheme designs (which, however, do not form part of the current Application).

The Buro Happold Environmental Statement Addendum contains the Accurate Visual Representations (AVRs) prepared by Miller Hare (see below) and describes amended parameter plans showing the changes from the approved scheme to the amended scheme.

There four main sections:

- Section 2 – Townscape, landscape and visual amenity constraints
- Section 3 – Built heritage issues
- Section 4 – Flood risk and drainage issues
- Section 5 – Residual effects

The Landscape Design Guidelines (jan 2018) is only updated in so much that the plan layouts are updated to reflect the latest plan proposals.

The Miller Hare Report, provides an updated whole series of Accurate Visual Representations, showing the visual impact of the Parameter blocks with minimum and maximums expressed as outline blocks, as seen from 14 chosen viewpoints

Comments:

Comments on the Reports:

The Buro Happold Environmental Statement Addendum

Appendix 2A includes a series of AVR's from a series of 14 viewpoints on The Leas, from The Bayle, from various viewpoints along Marine Parade, immediately north and alongside the development and from viewpoints on the north-west corner of the inner harbour, from the east end of The Stade, from higher above the old harbour and from two points along the outer harbour pier. These are essentially massing studies only with the intention of demonstrating the bulk and positioning of the development blocks but not the architectural design.

Comment -The views are comparable to those already approved under Application Y12/0897/SH.

Appendix 3A comprises solely of a one page statement by Stephan Lavrant Heritage Architecture Ltd. This heritage statement (dated 16/01/18) is additional to the heritage justification addendum and environment statement chapter 5 produced by HA Ltd in August 2017. (The August 2017 addendum concluded that the design revisions caused no more than a minor impact on the heritage assets most affected by the proposals and concluded that the proposals would cause "less than substantial harm to the heritage asset").

This latest (January 2018) additional statement notes that the proposed mass/volume and roofline of Plot B will vary, but that the extent of change is minor in the context of the development as a whole. It refers to the amended "Accurate Visual Representations" (appendix 2A) and concludes that the development would still sustain and enhance the special historic and architectural character of the heritage assets (both designated and un-designated). (see comments below)

Appendix 4A is a flood risk assessment by Buro Happold and as it is not a heritage or design issue, no comments are offered on this part of the report.

The Space Hub Folkestone Seafront Landscape Assessment (revision 2 January 2018) sets out the objectives and brief for the public realm and describes the site-wide landscape principles and provides illustrative proposals for each of the proposed character areas.

Comment -This report appears unchanged from the original report (save that the plans are updated to reflect the latest plan proposals) and this was commented on previously in November 2017.

The Acme Folkestone Seafront Master Plan Design Guide (revision A January 2018) shows the disposition of the blocks and open areas and shows changes to Block B where the plan has changed to a more regular crescent shape, with the higher end pavilions larger on plan, and with the west pavilion reduced from 29.5m to 28.5m and the east block increasing from 25m to 28.5m (so the two pavilions match). There are also changes to Block C where the lower centre part of curved block increases from 1.5m to 16.5m high.

The Sea Sports Centre is no longer provided due to it not being considered a viable option due to beach conditions and the provision of a similar facility elsewhere and the area is now proposed as car parking

The Acme Parameter Plan and Illustrative Scheme Comparison document – this new document is a very useful overview document which firstly reviews progress on the enhancements already carried out along the beach and at the harbour. It then goes on to make detailed comparisons between the approved master plan and the new amendment proposals, comparing specific areas and examining the existing and amended parameter plans as follows:

Section 1 – Public Realm Proposals

This reviews the considerable investment that has already taken place with public realm improvements.

Section 2 – General Master Plan Comparisons

The comparison between the approved master plan (which was a more simple grid of urban development extended as far the Boardwalk), with the proposed master plan which comprises a series of curved peninsular blocks extending south from Marine Parade towards the Boardwalk with Shingle Gardens between the blocks, smaller individual houses to the south of the Boardwalk spilling out onto the shingle beach zone and with the more concentrated commercial development at the east end on the old harbour parking areas.

- Consent vs Proposed (Parking) – The main change here is the provision of undercroft parking to the five peninsular blocks whilst retaining on street parking only along Marine Parade and removing all parking from beach side houses.
- Consent vs Proposed (Improved Pedestrian Circulation) – The main change here is the removal of conventional streets extending south from Marine Parade, replaced by a more irregular network of shared surfaces or pedestrianised areas. The circulation in the commercial block at the east end is simplified with a simple spine route through this block leading to the Harbour Arm.
- Consent vs Proposed (Public Spaces) – The proposed layout now provides a series of shingle gardens between the blocks and introduces the idea of a pedestrian route through the Marine Station (already built). There is a larger square on the South Quay of the harbour, to either side of where the swing bridge joins it and a much larger street through the middle of the commercial block.
- Consent vs Proposed (Demolition and Retention) – The principle change here is the retention of the Marine Station, work that is already in progress. However, as a result of this, the scheme now proposes the demolition of the Harbour House so as to improve the connection between the enlarged Station Square and the pedestrian route heading south-east along the curved Station
- Architectural Precedents – This explores urban development precedents in Amsterdam and Berlin which seeks to illustrate the desire for variety in the urban matrix.
- Uniformity and Variety in Development Block B – This illustrates in much greater detail than previously how the seemingly uniform crescent Block B can accommodate a wide variety of townhouses and flats.

Section 3 – Comparison of Selected Areas

- **The Leas Lift Square** –Here, **Block A** is unchanged from the previously approved scheme (*then called Block LL01*). The main change here is a slightly wider (8m from 4m) opening between the buildings, the connection between the *Leas Lift Square* and the beach. The west end of **Block B** (*previously called MP01*) increases from **20.5m** to **28.5m** and with the east pavilion of **Block B** the same height as the west (previously **16.5m**). The 3D indicative scheme design however shows a yet wider space opposite The Leas Lift, with the lower part of the previously called **Block LL01** given up to increase the space.
Comment – This is a distinct improvement allowing a wider gap opposite The Leas Lift which could be the justification for the higher bulk of the west end of **Block B**. However, it is unfortunate that this gap is not aligned with the axis formed by the lift since it will be that view of the sea, experienced by lift passengers, that is all important. The space between is much improved but needs to be adjusted to follow this axis.
- **Block B (formerly called Blocks MP01)** - The document shows a much more detailed illustrative scheme with an outward bow of houses containing a raised garden(above parking) on the Marine Parade side, fronted by the bow of 15.0m (3-storey)houses and flanked by two much taller **28.5m (7-storey)** pavilions at either end of the block.
Comment – This much more regular plan form of the block and the underlying symmetry of the building is a great improvement but the pavilions at the eastern end appear too massive (7 storey) and compares unfavourably with the six storey design of **Block C1** and the historic **Marine Crescent** opposite which is lower still. My view is that these end pavilions need to be reduced by at least one storey, so they are no higher than the end pavilions of **Block C1** and it would be a help if the top storey (of the reduced block) were designed as a penthouse set back from the edge to reduce the apparent bulk as seen from the street. (However the detailed design is not under consideration at this stage)
- **Green Walls** – This illustrates how the open void of the undercroft parking could be screened from Marine Parade.
- **Block C (opposite Marine Crescent) (formerly called Blocks MP02 and MP03)** – Here the proposal changes *from* the originally approved scheme of two rectangular blocks (*with a central 28m wide street set on the axis of Marine Crescent and with blocks a maximum of 16.5m and reducing to 13.5 at the sea-ward end along the street*) *to* a solid block, still with **4-storeys (16.5m)** frontages to Marine Parade but bisected by a 26m wide gap forming a park sloping up to a maximum **2.5m**, above the basement parking and with much higher **6-storey (20.5m)** pavilions at either end of the reversed crescent. The architectural visualisation envisages the gap as a raised area of gardens ramping up from Marine Parade, still maintaining a glimpse of the sea.
Comment – The changes to the scheme to allow a raised area at the centre of the block rather than an at-grade street would not significantly worsen the limited outlook from the historic **Marine Crescent** – particularly as the principle rooms in **Marine Crescent** are at first floor level. Generally, the change from rectangular *blocks MP02 and MP03* to the current block is an improvement, particularly as seen from the sea side but the block will still, as a whole, screen off **Marine Crescent** from the sea whilst allowing views to and from the sea through the gap at the centre of the crescent (*as indeed it does in the approved scheme*). This section doesn't really explore the impact of the higher proposed end pavilions relative to **Marine Crescent** and the concern is that these elements (*at 6 storeys - 20.5m in height*) could have an overbearing impact on the setting of **Marine Crescent**, opposite, to its detriment. However, not as much as the **7 storey (28.5m)** east pavilion of **Block B** however. Both appear to be out of scale with **Marine Crescent**.
- **Crescent Way Connection** – This is opposite the south end of Harbour Approach Road and here the redesign narrows down the gap between *blocks E1 and F1* from **26-30m** to **13.5-22m**. However, to

the south of this the peninsular blocks open out rapidly to either side.

Comment – Whilst the gap between blocks is narrower, the way in which the blocks curve away rapidly from the pinch point to create a rapidly widening shingle beach zone is a distinct improvement on the approved scheme (which is merely a wide street between blocks *MP06* and *MP03*). The pinch point gap is still generous, and the architectural visualisation shows how this may appear. This change is a distinct improvement.

- **Station Square** – This is immediately to the west of the where the swing bridge meets the South Quay. Block H is between the space and the harbour. Block *PH03/DW05/PH09/PG04* to the south of the square is renamed **F1** and *Block PH1*, a commercial block to the east of the station platforms is renamed **G1**. Changes include:
 - **Block H** (was *PH02*) increases in height from **20.5m** to **35.5m**
 - **Block F1** (was *PH03/DW05/PH09/PG04*) is unified as a single block mostly of the same height as previously proposed but with development along the south side of the square higher (**20.5m** from **16.5m**) with to the south of it a smaller block **F2** (same height as *DW05/PH09*)
 - **Block G1** remains a similar height to that previously proposed
 - **The Harbour House**, previously retained, is now shown demolished

Comments – **Block H** is proposed to be much higher than before. The parameter of **35.5m** is the second highest element of the entire scheme. The illustrative aerial view visuals seems misleading in that they show this block at eight stories but elsewhere eight stories equates to a parameter height of **29.5m**. It therefore follows that 35.5m would equate to say ten stories. (For comparison, the main bulk of the *Burstin Hotel* opposite is eight stories with only the top pinnacle area rising to 14 stories). The changes in the other surrounding blocks are not considered significant and in the context of the space of the proposed Station Square, the increase in the height of the south side of the square (**F1**) from **16.5m** to **20.5m** seems not unreasonable.

The main change however is the proposed **demolition of Harbour House** which is an attractive classical remnant of the much larger Harbour complex. It is shown demolished as it is considered to be in the way of the circulation flow of the new station square and the station platform pedestrian route south. The aerial models attempt to show how inappropriate the building will appear in its new context.

I have distinct reservations about this. The **Harbour Masters House** is one of the few remnants of the historic harbour complex, of which, so much has been destroyed and is therefore of interest even though it is not statutorily Listed. The retention of the station platforms and their canopies is of course very welcome, providing, as it will a connection between the harbour arm pier through the station and over the grade II listed Swing bridge but the **Harbour Masters House** is also part of the depleted complex. However there has been a trade-off between retaining the station or the house, as the station is lost in the approved scheme. Whilst it is suggested that the building would be an impediment to pedestrian flows to the station route, on the other hand if retained, the building could form a very fitting focal point for the square and, indeed, the positioning of the building is part of the formal arrangement of the whole area, being also positioned as the focal point at the end of *Marine Parade* and seen from right along the length of the parade. Its loss would have a significant impact on the character of the area as a whole and I consider that as the scheme develops, efforts should be made to retain this undesignated Heritage Asset and to modify the architectural treatment of the blocks around it so that it will not appear inappropriate in its new setting. The current illustrative designs fail to achieve this.

- **Inner Harbour Block H** – The merits of the changed design to **Block H** is explained here. The parameters change from a larger footprint but lower (20.5m) building all along the square to a smaller but much taller (35.5m) point block.

Comment – As such, the revised scheme makes for a much more open character to the area with

more connectively between the station square and the harbour itself. The retention of the station platforms and refurbishment of the station is of course a significant improvement on the proposed scheme, which did not retain the station at all. The wisdom of retaining the station is already becoming apparent as the regeneration of the Harbour Arm and the landscaping of the station platform proceeds and as such, it can be considered that the retention of the harbour station as an undesignated heritage asset with a viable long term use is of significant benefit to the amended scheme.

The historic interest of the *Marine Station* and in particular its role in WWI has been much explored recently and with the centenary of WWI, the historic resonances of the area have become much more fully appreciated than was the case before. The retention of the station is therefore a very wise decision. The station and its relationship to the infrastructure of the harbour and port is of the greatest historic and cultural significance to Folkestone but *all* of the remnants of the former harbour feature are of interest and all the more valuable as they are the few surviving remnants of the old harbour complex that has otherwise mostly disappeared and all efforts should be made to retain this building within the development, where it is possible to do so.

- **South Quay (formerly Block P1 now G1)** – This block occupies the same footprint as before. However the pattern of development shown in the illustrative plans has changed, previously this area, conceived as a series of blocks with a frontage block on the north side facing the harbour and four blocks radiating south from this, has now completely changed. Instead, the block is bisected by a main route way which connects the *South Quay* with the area at the start of the *Harbour Arm*, with the development arranged all around the perimeter of the block and varying between 20.5m (along South Quay) and rising to two towers of 40.5m at the extreme eastern edge overlooking the sea. These are the tallest buildings in the development.

Comment – The main change (the introduction of the north-south route through the centre of the block) is a sensible change that improves the connection with the Harbour Arm. The parameter heights are unchanged. The illustration design has a very awkward junction with the retained *Customs House* (the only remnant of the Marine Station that still survives). However, the scheme is illustrative, so this can be explored in detail at a later stage.

Section 4 – Summary of Comments on the amendments to the Master Plan Comparison as a Whole

The document describes revised proposals that have been redesigned with significantly different master planning and proposes a more open interface with the beach and a less urbanised character as a whole. There is a slight widening of the opening of the connection with the sea at The Leas Lift; changes in height along Marine Parade; a rearrangement of the area to the south of the harbour, with a station square now better connected to South Quay; the demolition of Harbour House; the retention of the station and a new route proposed across the eastern commercial block improving the connection with the Harbour Arm.

Generally, the revised scheme appears much more appropriate and attractive and the main concerns include:

- The opening between the blocks at the Leas Lift Square is improved by being wider but it is important that the gap is set on the axis with the lift.
- The increase in height of the pavilion ends Block B. This could, to a certain extent be mitigated by the architectural treatment, with the apparent bulk being reduced, possibly by the setting back of the top floors -expressed as penthouses
- Whilst the changes to Block C will not worsen the separation of block of Marine Crescent from its sea views, the increased height of the pavilions ends and their relationship to Marine Crescent is of concern and there is a need for further investigation of the relationship between the two.
- The need for clarification of the extent of the increase in height of Block H so that comparison can be made with the Burstin and enabling an understanding of its impact in views from The Bayle
- The demolition of Harbour House, where every effort should be made to seek its retention

Section 5 – Comments on the effect of the amendments to the scheme on the AVR's

- **View 2 from the top of Leas Lift** – From here the entire sweep of **Block B** will be visible, occupying the space currently part of the open beach shingle area between the Boardwalk and Marine Parade and also a car parking area. The change is in the heights of the end pavilions.
Comments – The increase in height of the end pavilions will increase their prominence in views of the sea from this viewpoint.
 It is a pity that the AVR does not explore the views from the Grade II* Leas Lift itself since the views experienced by lift travellers are relevant.
- **View 3 from the roof deck of Leas Cliff Hall** – From here the development can be seen in the mid-distance when looking east. There is still a glimpse of the west end of *Marine Crescent* but the developed area between *Marine Parade* and the *Boardwalk* is visible in a foreshortened way.
Comment – The impact of the changes will not significantly change the views of the development as seen from this viewpoint.
- **View 5 (no view 4) from lower Leas Coastal Park east end** – Here there is currently an open outlook with *The Leas Lift* on the west side and the *Lower Sandgate Road* in a rather open and barren landscape. *Marine Crescent* in the distance dominates locally and is a remnant of the former more urbanised character of the area.
Comments – This area was once more of a focal point pre-war with the entrance to the Victorian Pier, the Camera Obscura, the Lifeboat House and other boathouses, and just to the east of The Leas Lift the bulk of the Lido between The Leas Lift and Marine Crescent. All of this is now gone leaving the area very much a non-place with only the road and *Marine Crescent* left over from the former arrangements here.
 The changes to the scheme will not impact on the views as seen from this viewpoint
- **View 6 Beach by furthest east groyne** – This is a viewpoint further to the west from the beach beside the *Lower Leas Coastal Park*. Again, the *Leas Slope* predominates. In the distance is Marine Crescent and further on, *The Burstin* – all rather conjoined because of the foreshortening of distance.
Comments – The proposed view portrays the extent of development projecting out on to the beach with **Block A** dominating and beyond, the curved “prows” of the perimeter blocks receding into the distance. The impact of the changes will not significantly change the views of the development as seen from this viewpoint.
- **View 7 Marine Parade-West End** – This is the empty townscape referred to in the comments in View 5 – a bleak open townscape with car parks to either side of Lower Sandgate Road, which here is quite a substantial highway. The proposal view shows how the proposed development forms an urban frontage along the south side of Marine Parade, which will then become an urban street separated from the sea by the development. The frontage of **Block B** is changed from a low plinth (presumably over the undercroft parking) to a three storey frontage, with 7-storey end pavilions facing onto Marine Parade.
Comments –, The view does rather demonstrate the height of the end pavilions, which seem rather out of scale with Marine Crescent, just beyond the eastern pavilion.
- **View 8 Marine Parade-East End** – This is a view looking west taking from about opposite the southern end of *The Burstin*. At present the site of the former Rotunda Park is entirely vacant and entirely fenced. The proposals show, in simplistic form, the development extending all the way to the west forming a new frontage giving onto *Marine Parade*. The revised proposals show an increase in height to these blocks.
Comment – The impact of this part of the scheme parameter proposals is unchanged from before
- **View 10 (no view 9) Harbour Approach-North End** – This viewpoint, close to the last one, shows the side of the **blocks E1** and **D1** and this can be compared with the existing bulk of *The Burstin*. The height is raised here by about two stories from the approved scheme.
Comment – The impact of this part of the scheme parameter proposals is unchanged from before

- **View 11 from Harbour Square** – This is the existing area with the fountains and seafood bar. The views show the impact of the high **blocks H, F1 and G1** over on the south side of the harbour.
Comment –The main change will be the increased height of Block H and from this view point, the increase in height will be offset by the decrease in the overall massing of the block.
- **View 12 from the Harbour Arm-North End** –This view shows the area before the harbour dominated by the rather brutal concrete coastguard station and behind it the massive bulk of *The Burstin. Monument House* sticks out in an unsightly way from the top of the *Leas Slope*.
Comments – The changes in the seafront blocks to curved promontory type buildings separated by ‘Beach gardens’ will soften the impact of the scheme from seafront views.
- **View 13 from the Harbour Arm-Middle** – From here the development of the lower town is clustered all along the base of the broad shingle beach and existing development comprises of the two blocks of c19th terraces (*Marine Crescent* and *Marine Parade*) sitting in front of the wooded slope of *The Leas*, with *Monument House* on *The Leas* the most significant element of the existing town projecting above the wooded *Leas Slope*. At centre view, the mass of *The Burstin* completely obscures the wooded *Leas* escarpment and with its upper elements (floors 11-14) rising above the general level of the old town behind.
Comment –The changes in the seafront blocks to curved promontory type buildings separated by ‘Beach gardens’ will soften the impact of the scheme from seafront views. The impact of the changes will not significantly change the views of the development as seen from this viewpoint.
- **View 15 from the east pier (The Stade)** - From here the existing view of the area is dominated by the mass of *The Burstin* – 10 storeys rising to 14 storeys forming the “*Bridge*” or the “*Liner*” that this building resembles. The rest of the harbour is now mostly open ground, used mainly for car parking and with only the low form of the *Marine Station* as a sort of plinth in this area.
Comment –
The main change will be the increased height of Block H and from this view point, the increase in height will be offset by the decrease in the overall massing of the block
- **View 16 (no view 15) from Channel View** – This is a view point from an open play area set on rising ground just to the north of *The Stade*. With views out to sea – hence the name!
This viewpoint will offer a “straight on” view of the eastern development Blocks H and G1, which will front onto the *South Quay* of both the inner and outer harbour.
Comment - The main change will be the increased height of Block H and from this view point, the increase in height will be offset by the decrease in the overall massing of the block
- **View 21 (no views 17-20) from The Bayle-** Here the wide roadway of *The Bayle* extends out towards the edge of the promontory upon which *Old Folkestone* became established. The viewpoint demonstrates that the upper part of Block G1 will be visible here, next to the topmost part of the *Burstin Hotel*.
Comment – *The Bayle* is a broad space lined with two and three storey buildings on its north and south sides but at the eastern end it is undeveloped , allowing open views across and out to sea. The uppermost parts of the *Burstin* (the “*bridge*” or the “*liner*” appears in this view but is fortunately set over to one side, appearing to be in line with the houses on the southern side of *The Bayle* itself. The main body of the hotel, the 10 storey bedroom block, is lower and, as a result, does not intrude into this important view.
The only change will be the increased height of Block H and it seems likely that this will not be visible from this view point as block H is over to the right, behind *The Burstin* upper storeys
- **View A1 from Marine Crescent (west end) looking east along Marine Parade** - At present the Curved facades of *Marine Crescent* face out south across the open shingle beach areas, only recently landscaped as a part of the *Boardwalk Development* works.
The proposed Block C1 will be positioned opposite the *Crescent*, with the development block

forming a frontage along Marine Parade, facing across to the Crescent,

Comment –

The change here is to the height of the proposed end pavilions, which will increase to 6-storey (20.5 m). The concern is that these end pavilions will appear will appear out of scale with the ends of the Crescent.

Recommendations:

Summary of Comments

The current application now shows a level of indicative detail that demonstrates the extent of the proposals in an indicative architectural form informing the views of the diagrammatic parameter heights and plans and, in addition, the combination of Accurate Visual Representations and indicative architectural visualisations demonstrates, the possible appearance of the scheme and its impact on the setting of Folkestone, the Harbour and the existing Heritage assets along the Marine Parade, these, in particular, including

- The Leas Lift and Lower Lift Station
- Marine Crescent
- Terraces at no's 5-15 Marine Parade

These all within the Conservation Area and Grade II Listed

As well as the buildings clustered around the southern end of the Swing Bridge and the Marine Station

- The Customs House
- Signal Box
- Harbour House
- Marine Station

These outside the Conservation Area and unlisted but to be considered as Heritage Assets.

In addition, the AVR's demonstrate the impact of the development from viewpoints up on The Leas and from The Bayle in the Old Town Conservation Area.

The increased level of visuals helps with the appreciation of the scheme in general and certainly some of the broader changes from the approved outline scheme could be considered as distinct improvements, these including:

- The change in the general principle of the development from a more urbanised scheme to a series of curved promontory blocks separated by shingle gardens.
- The change from a share surface roadway along the beach to a fully pedestrianised Boardwalk
- The increase in the gap between blocks A and B, Leas Lift Square (but see my reservations about this below)
- The change to a symmetrical plan – Block B
- The reduction in the gap between blocks E1 and F1 and the street here becoming a beach garden
- Reduction in plan area – Block H
- Increase in size of Station Square and its connectivity to the Harbour
- The new circulation route between Blocks F1 and G1 – connecting to the Harbour Arm
- The retention of the Marine Station and its conversion to a principal pedestrian circulation route

The AVRs help to illustrate the impact the scheme but are, at this stage, representations of the Design maximum parameters rather than Architectural proposals and therefore give a rather false impression of what the areas might look like in due course. Nevertheless they help illustrate of the changes to the scheme and raise a number of concerns, which are discussed above.

These include:

- The gap between blocks A and B – wider than before and an improvement on the approved

scheme, but still not wide at Leas Lift Square The non-alignment with the axis of the Leas Lift itself needs further consideration

- The increased height of the end pavilions of Block B and their impact, particularly the eastern pavilion on Marine Crescent (*Substantial*)
- The increase in height along the Marine Parade frontage of Block C1 and the increase in height of its end pavilions, out of scale with Marine Crescent opposite.
- The proposed gap at the centre of block C1, raised up to first floor level will lessen the meaningful connection between the terrace and the sea here
- The height of Block H and its possible dominating impact on the scale of the inner harbour and in wider views of the town
- The demolition of Harbour House, (an undesignated Heritage Asset), where efforts should be made to retain this building within the development, if it is possible to do so

End.

This page is intentionally left blank