

CABINET

9 MAY 2017

LAND AT MARLBOROUGH ROAD/HIGH STREET, GILLINGHAM

Portfolio Holder: Councillor Adrian Gulvin, Resources
Report from: Perry Holmes, Chief Legal Officer
Author: Des Andrews, Senior Valuation Surveyor

Summary

This report seeks delegated authority for officers to dispose of the above council owned site on the best terms reasonably obtainable.

1. Budget and Policy Framework

1.1 As the consideration payable to the council for the disposal is likely to be over £100,000, this is a matter for Cabinet.

2. Background

2.1 The land and buildings shown edged black on attached plan are owned by Medway Council and were previously let to a private nursery and to a marching band.

2.2 The land and buildings have not been used since becoming vacant and have not been required for Council use.

2.3 The land and buildings are situated in the Brompton Lines Conservation Area Appraisal (2006) that was adopted by Medway Council in April 2006.

3. Options

3.1 Cabinet can decide to either:

3.1.1 Grant delegated authority to allow officers to dispose of the land.

Or

3.1.2 Refuse to delegate this authority, which would mean that the land can not be sold.

3.2 The recommended option is 3.1.1.

4. Advice and analysis

- 4.1 The site has not been used since October 2008 and the buildings on it are derelict with the site not being required for council use.
- 4.2 If the site is sold, it is likely that, subject to the necessary planning approvals being obtained, it will be redeveloped.
- 4.3 Given the fact that the site is within the Brompton Lines Conservation Area Appraisal (2006), Officers were asked to produce a Planning Statement which will be provided to any prospective purchaser. The Planning Statement which is at Appendix 2, advises potential purchasers of the main planning considerations relating to the site and provides a framework to guide future development. This will allow purchasers to address any contentious or problematic issues prior to the submission of a formal planning application for development of the site.

5. Risk management

- 5.1 If Cabinet refuses to dispose of the land, it will remain derelict and unused and the council will not be able to realise a significant capital receipt.

Risk	Description	Action to avoid or mitigate risk
The site remains derelict	Cabinet does not delegate authority to dispose of the site, so it can not be sold.	Grant delegated authority to allow the site to be sold.

6. Consultation

- 6.1 The Portfolio Holder and the Council's Planning Department have been consulted and have not objected to the proposed disposal.

7. Financial and legal implications

- 7.1 The Council is under a duty to obtain the best consideration reasonably obtainable when it disposes of interests in property, unless consent is obtained from the Secretary of State or one of the general consents applies.

8. Recommendation

- 8.1 Cabinet notes the production of a Planning Statement relevant to this disposal.
- 8.2 Cabinet is asked to delegate authority to the Chief Legal Officer, in consultation with the Portfolio Holder for Resources, to dispose of the land as shown edged black on the attached plan (land at Marlborough Road/High

Street, Gillingham), as set out in Appendix 1 to the report, on the best terms reasonably obtainable.

9. Suggested reasons for decision(s)

- 9.1 In order to reduce management costs, facilitate development and obtain a capital receipt.

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Appendices

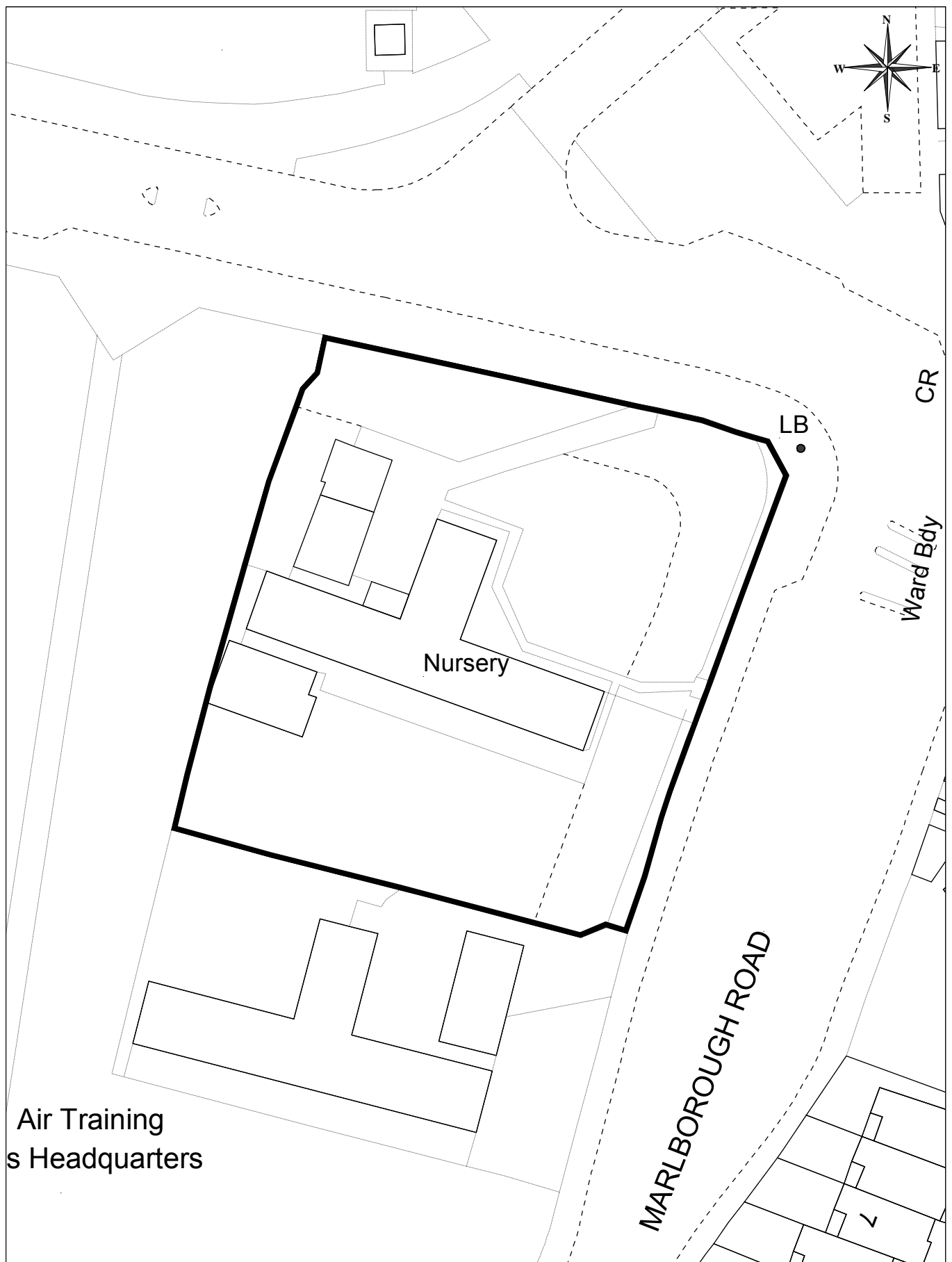
Appendix 1 – Site Plan

Appendix 2 – Planning Statement

Background papers

None

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**Land Marlborough Road / High Street
Gillingham**



Serving You

Scale: 1:500 10/03/17

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Planning Statement

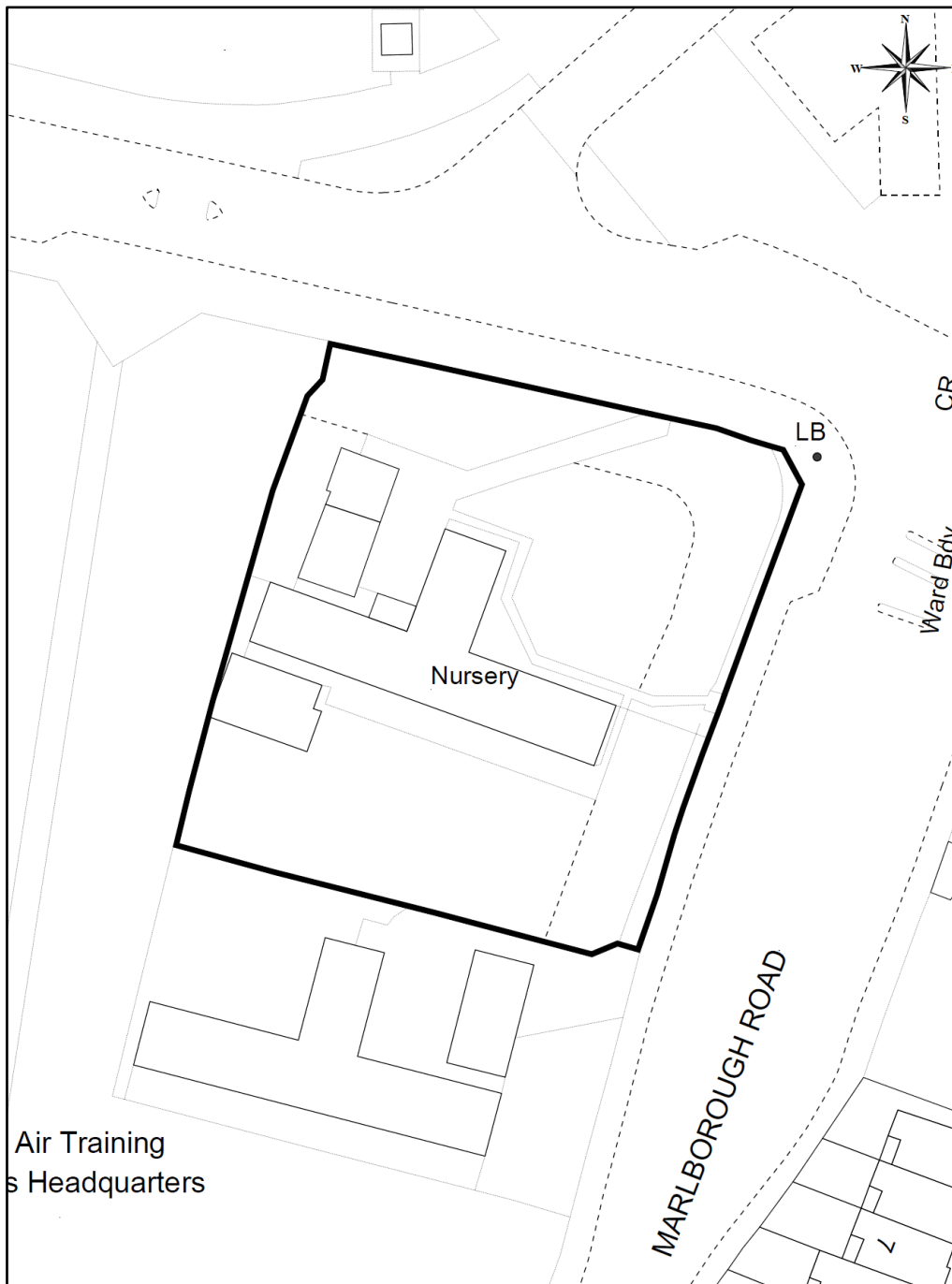
**Land at the corner of
Marlborough Road and
Brompton Road, Gillingham, Kent**

**Medway Council
Business Support Department
Asset and Property Services
Gun Wharf
Dock Road
Chatham
Kent
ME4 4TR**

February 2017

1.0 Introduction

- 1.1 This document is a Planning Statement relating to land at the corner of Marlborough Road and Brompton Road, Gillingham, Kent. The extent of the site is shown on the plan below:



- 1.2 This site is currently in the ownership of Medway Council but has now become surplus to requirements. It is therefore being marketed for sale.
- 1.3 This Planning Statement has been produced to advise potential purchasers of the main planning considerations relating to the site and to provide a framework to guide future development. This will allow purchasers to address any contentious or problematic issues prior to the submission of a formal planning application for development of the site. This in turn will help to avoid delays during the formal consideration of any such planning application and also provide a level of certainty for purchasers in terms of the financing and programming of future development. Although this Statement establishes a planning framework that will be used to assess any future planning applications it does not bind the Council to granting permission for any particular development on the site.
- 1.4 This Statement is structured as follows:
- **Section 2** describes the site and its surroundings;
 - **Section 3** provides details of relevant development plan and government policy;
 - **Section 4** provides a discussion of the planning considerations relating to the development of the site;
 - **Section 5** sets out the requirements relating to any planning application for the development of the site;
 - **Section 6** provides a conclusion.

2.0 The Site

- 2.1 The site measures 2,288m² in area and is located at the junction of Marlborough Road and Brompton Road, Gillingham. It is broadly rectangular in shape and is bounded to the east by Marlborough Road and to the north by Brompton Road. To the west lies the Great Lines Heritage Park. The site to the

south is known as the Great Lines Studio and contains buildings occupied by an architectural business.

2.2 The site contains single storey buildings that are currently vacant. These were previously in use as a children's nursery. The site is relatively flat and contains a number of mature trees, the majority of which are located within proximity to the site boundaries.

2.3 The following photograph provides a view of the site from the junction of Marlborough Road/Brompton Road:



2.4 The site is defined on the proposals map of the Medway Local Plan 2003 as lying within the urban area and also the Brompton Lines Conservation Area.

3.0 Planning Policy Context

3.1 The planning policy context relating to the development of this site is discussed below under the following headings:

- Development plan; and
- Other relevant policy documents.

Development Plan

- 3.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. For the purposes of the development of this site the development plan comprises the saved policies of the Medway Local Plan 2003 (the Local Plan).

Saved Policies of the Local Plan

- 3.3 The most relevant saved policies of the Local Plan that relate to the potential development of this site are summarised below. This is not necessarily an exhaustive list:

- **Policy S6: Planning Obligations** – this sets out a requirement for developer contributions where the need for these arises directly from the development concerned.
- **Policy BNE1: General Principles For Built Development** - this sets out general principles for built development and seeks to ensure that the design of development is appropriate in relation to the character, appearance and functioning of the built and natural environment.
- **Policy BNE2: Amenity Protection** - this seeks to ensure that all development secures the amenities of its future occupants and protects those amenities enjoyed by nearby and adjacent properties.
- **Policy BNE4: Energy Efficiency** - this seeks to ensure that energy efficiency measures are incorporated within new development proposals.
- **Policy BNE12: Conservation Areas** – this requires that special attention will be paid to the preservation and enhancement of the

character and appearance of Conservation Areas, as defined on the proposals map.

- **Policy BNE14: Development In Conservation Areas** – this sets out the detailed criteria that will be applied to development within conservation areas or affecting their setting.
- **Policy BNE43: Trees On Development Sites** – this states that development should seek to retain trees, woodlands, hedgerows and other landscape features that provide a valuable contribution to local character.
- **Policy H4: Housing In Urban Areas** – this states that within the urban area residential development will be permitted consisting of, *inter alia*, the use of vacant or derelict land or the change of use or redevelopment of existing buildings no longer required for non-residential use.
- **Policy T1: Impact Of Development** – this states that in assessing the highways impact of development, proposals will be permitted provided that they meet set criteria including ensuring that the highway network has adequate capacity to cater for the traffic that will be generated by the development and ensuring that the development will not significantly add to the risk of road traffic accidents.
- **Policy T2: Access To The Highway** – this seeks to ensure that proposals which involve the formation of a new access, or an intensification in the use of an existing access, are acceptable in terms of highway safety.
- **Policy T3: Provision For Pedestrians** – this requires development proposals to provide attractive and safe pedestrian access.
- **Policy T4: Cycle Facilities** – this requires development proposals to make provision for cycle facilities related to the site including secure cycle

parking facilities in accordance with the Council's adopted cycle parking standards.

- **Policy T13: Vehicle Parking Standards** – this requires development proposals to make vehicle parking provision in accordance with the Council's adopted parking standards and as set out in the Interim Residential Parking Standards.
- **Policy CF1: Community Facilities** - this states that development which would result in the loss of existing community facilities will only be permitted where it can be demonstrated that exceptional circumstances exist such that it would be beneficial to redevelop sites. Replacement facilities of a similar scale and kind will be sought. They should be easily accessible by the local population by a variety of means of transport, including public transport, cycling and walking.
- **Policy CF2: New Community Facilities** – this states that new community facilities will be permitted subject to meeting specified criteria.

Other Relevant Policy Documents

- 3.4 There are other policy documents that may be relevant in the consideration of the development of this site. These include the following:

National Planning Policy Framework (2012)

- 3.5 In March 2012 the Government published the National Planning Policy Framework (NPPF). This sets out the Government's planning policies for England and how these are expected to be applied. This document is a material consideration in planning decisions.
- 3.6 The NPPF contains a presumption in favour of sustainable development. Paragraph 14 of this document is particularly relevant in this respect:

*At the heart of the National Planning Policy Framework is a **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision-taking.*

Brompton Lines Conservation Area Appraisal (2006)

- 3.7 The Brompton Lines Conservation Area Appraisal was adopted by Medway Council in April 2006. This document contains an appraisal of the qualities of Brompton Lines Conservation Area since designation. It includes an assessment of the area's historical, architectural, archaeological, townscape, landscape and ecological significance. It is a material planning consideration in the assessment of planning applications for development proposals within this designated area.

4.0 Planning Considerations

- 4.1 The main planning considerations relating to the development of this site include the following:

- Principle of development;
- Design;
- Heritage assets;
- Residential amenity;
- Trees
- Highway issues;
- Sustainability;
- Developer contributions.

- 4.2 These issues are discussed in more detail below:

Principle of Development

4.3 The principle of the development of this site is discussed below under the following sub-headings:

- Policy context – community uses;
- Policy context – loss of existing community use;
- Employment development;
- Residential development.

Policy context

4.4 The former use of the site as a children’s nursery would be classed as a community use in planning terms. The development of this site for alternative community uses would find broad support at a national and local level.

4.5 One of the core planning principles set out in the NPPF is that planning should “take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs” (paragraph 17). This requirement is emphasised in paragraph 70 of the NPPF:

To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- *plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;*
- *guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs;*
- *ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community; and*

- *ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.*

4.6 At a local level Policy CF2 of the Local Plan relates to the provision of new community facilities and is reproduced in full below:

POLICY CF2: NEW COMMUNITY FACILITIES

New community facilities will be permitted subject to:

- (i) the size and scale of development being appropriate to the site; and*
- (ii) the development having no detrimental impact on the countryside, residential amenity, landscape or ecology; and*
- (iii) accessibility by the local population by a variety of means of transport, including public transport, cycling and walking.*

4.7 In light of the above it is considered that the broad principle of the development of the site for community uses could be supported in terms of the provisions of the NPPF and the Local Plan.

Policy context – loss of existing community use

4.8 As set out above, the most recent use of the site and associated buildings as a children's nursery would be classed as a community use in planning terms. Paragraph 70 of the NPPF relates to the loss of such facilities. It requires that planning decisions should, *inter alia*:

- *guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs*

- 4.9 In addition, Policy CF1 of the Local Plan relates to the loss of community facilities. This policy is reproduced in full below:

POLICY CF1: COMMUNITY FACILITIES

Development which would result in the loss of existing community facilities will only be permitted where it can be demonstrated that exceptional circumstances exist such that it would be beneficial to redevelop sites.

Replacement facilities of a similar scale and kind will be sought. They should be easily accessible by the local population by a variety of means of transport, including public transport, cycling and walking.

- 4.10 Paragraph 70 of the NPPF and Policy CF1 of the Local Plan would be relevant in the consideration of development proposals involving the loss of the existing community facility on this site. As such any planning application would need to be accompanied by a case to justify the loss of the existing facility. It is acknowledged that the site has remained vacant and has not been in active use as a community facility for a number of years. The length of time that the site has remained vacant and the resulting poor condition of the buildings could provide a significant element in any such justification.

Employment development

- 4.11 This site may lend itself to small-scale employment development. Support for such use can be found in the NPPF. One of the 12 core planning principles set out in this document requires that planning should “proactively drive and support sustainable economic development to deliver the homes, businesses and industrial units, infrastructure and thriving local places that the country needs” (paragraph 17).

- 4.12 Support can also be found in the Local Plan. The strategic aim of the Local Plan “is to stimulate and strengthen the expansion of economic activity in Medway to support the continued regeneration of the area’s economic base, improve employment opportunities for its population and reduce the need for outward commuting” (paragraph 4.4.1)
- 4.13 Due to the sensitive location and limited size of the site, employment development would almost certainly need to fall within Class B1 (business) of Town and Country Planning (Use Classes) Order 1987 (as amended). This may include small scale offices or workshops. Such development would need to be single-storey (see paragraph 4.20 below)
- 4.14 For the reasons set out at paragraph 4.10 above, any planning application for employment use on this site would need to be accompanied by a case to justify the loss of the existing community facility.

Residential development

- 4.15 It is anticipated that potential purchasers may wish to develop the site for residential purposes. The principle of residential development finds support in the NPPF. The NPPF seeks to “boost significantly the supply of housing” (paragraph 47) and requires that housing applications “should be considered in the context of the presumption in favour of sustainable development” (paragraph 49).
- 4.16 At a local level the site is located within the urban area as defined on the proposals map of the Local Plan. Policy H4 of the Local Plan relates to housing in urban areas and states that within such areas residential development will be permitted consisting of, *inter alia*, the use of vacant or derelict land or the change of use or redevelopment of existing buildings no longer required for non-residential use.
- 4.17 Due to the sensitive location of the site, proposals for residential development would be expected to be single storey (see paragraph 4.20 below). In addition,

any planning application for residential use on this site would need to be accompanied by a case to justify the loss of the existing community facility (see paragraph 4.10 above).

Design

- 4.18 The need for good design is set out in both the NPPF and the Local Plan. Paragraphs 56 and 57 of the NPPF are particularly relevant:

56. The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

57. It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.

- 4.19 In addition, Policy BNE1 of the Local Plan sets out the general principles that the Council would expect to be applied to the design of new development. This policy is set out in full below:

POLICY BNE1: GENERAL PRINCIPLES FOR BUILT DEVELOPMENT

The design of development (including extensions, alterations and conversions) should be appropriate in relation to the character, appearance and functioning of the built and natural environment by:

- (i) being satisfactory in terms of use, scale, mass, proportion, details, materials, layout and siting; and*
- (ii) respecting the scale, appearance and location of buildings, spaces and the visual amenity of the surrounding area; and*

(iii) *where appropriate, providing well structured, practical and attractive areas of open space.*

- 4.20 The site is located adjacent to the Great Lines Heritage Park. This forms part of an Area of Local Landscape Importance (ALLI) and is an area of protected open space. It is a prominent open area of historical interest which defines the western edge of Gillingham. Development on this site would need to be sensitively designed to ensure that it respects the visual importance of this adjacent open area. In light of this it is expected that new development would be single storey.
- 4.21 Any planning application for the development of this site would also need to demonstrate how the proposal meets the design requirements set out in the NPPF and Policy BNE1 of the Local Plan.

Heritage Assets

- 4.22 The NPPF defines the term ‘heritage asset’ as follows:

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).

- 4.23 The site is located within the Brompton Lines Conservation Area. Conservation areas are areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. Brompton Lines was designated a conservation area on 3 February 1981. An extension to the conservation area was designated on 25 April 2006.
- 4.24 At a national level the importance of heritage assets is recognised in the NPPF. One of the twelve core planning principles of the NPPF is that planning should:

- *Conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.*

4.25 Paragraph 129 of the NPPF advises on how local planning authorities should assess proposals relating to heritage assets:

Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking into account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

4.26 Paragraph 132 provides the following requirement:

When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.

4.27 The Government's Planning Practice Guidance "Conserving and enhancing the historic environment" provides further advice on planning issues relating to the historic environment.

4.28 At a local level Policy BNE14 of the Local Plan relates to conservation areas and requires that new development "should achieve a high quality of design

which will preserve or enhance the area's historic or architectural character or appearance".

- 4.29 Conservation area appraisals have been adopted by Medway Council for a number of its conservation areas including Brompton Lines (see paragraph 3.7 above). Conservation area appraisals are documents explaining the architectural and historical qualities that make each conservation area special. They help the Council and others to judge whether new development will preserve and enhance the conservation area and ensure that the architectural and historic significance of an area is taken into account when considering development proposals and schemes.
- 4.30 The Brompton Lines Conservation Area Appraisal was adopted by Medway Council in April 2006 and is a material planning consideration.
- 4.31 Any planning application for the development of this site would be required to be accompanied by a heritage statement. This statement should assess the nature, extent and importance of the significance of the conservation area and its setting and should be detailed enough that the impact of the proposed works on that significance and setting can be fully assessed by the local planning authority. The heritage statement would need to demonstrate how the proposal meets the requirements set out in the NPPF, the Government's Planning Practice Guidance "Conserving and enhancing the historic environment", the relevant policies of the Local Plan and the Brompton Lines Conservation Area Appraisal.

Residential Amenity

- 4.32 One of the twelve core planning principles of the NPPF is that planning should secure "a good standard of amenity for all existing and future occupants of land and buildings" (paragraph 17). In addition, Policy BNE2 of the Local Plan requires all development to secure the amenities of its future occupants and to protect those amenities enjoyed by nearby and adjacent properties.

4.33 The nearest residential properties to the site are located on the eastern side of Marlborough Road and the northern side of High Street/Brompton Road. In view of the location of these properties and their distance from the site it is considered that the development of this site is unlikely to impact upon the residential amenity of nearby occupiers.

Trees

4.34 There are a significant number of trees on the site many of which are mature and provide amenity value within this locality. These may place a constraint upon the level of development that could be carried out on this site.

4.35 Policy BNE43 of the Local Plan states that development should seek to retain trees, woodlands, hedgerows and other landscape features that provide a valuable contribution to local character. It is therefore likely that there will be a requirement for many of the existing trees to be retained.

4.36 Any planning application for the development of this site would need to be accompanied by a detailed tree survey. This should identify all trees on site as well as those that may be affected on adjoining land. It should clearly identify those trees and other vegetation that are to be retained and those that would need to be removed as a result of the development of the site. The survey should cover a range of information about trees at the site and on adjoining land and their contribution to the street scene, visual amenity and ecological importance.

4.37 Any new development proposals would also need to be accompanied by a detailed and comprehensive landscaping scheme. Landscape proposals should form an integral part of any development proposals. The landscaping scheme should include:

- Existing and proposed finished ground levels;
- Means of enclosure, e.g. fencing, boundary walls or hedging;

- Hard surfacing materials, structures and ancillary objects (lighting columns, refuse bins etc);
- A schedule of new planting showing species, size at time of planting and planting density;
- An implementation programme for when and at what stage of the development the planting will be carried out;
- A scheme for the planned maintenance of the proposed planting.

Highway Issues

4.38 The development of this site would need to be satisfactory in terms of highway safety and parking provision. The site does not benefit from a vehicular access. Indeed, the provision of such an access may be challenging given the number of trees located in proximity to the boundaries of the site and the potential impact upon existing on-street parking provision. If proposals were to make provision for new access arrangements to serve the site it would be necessary to demonstrate that such arrangements are suitable to serve the proposed development and meet existing standards thereby ensuring vehicle and pedestrian safety.

4.39 Ordinarily, development proposals would be required to provide on-site parking in accordance with the Council's current adopted parking standards. These standards can be found on the Council's website via the following link:

<http://www.medway.gov.uk/pdf/parking%2ostandards%2020041.pdf>

4.40 The Council has also adopted interim parking standards for residential development. These can be viewed on the Council's website via the following link:

<http://www.medway.gov.uk/pdf/Medway%20Council%20Residential%20Parking%20Standards%20Jan%202010.pdf>

- 4.41 Given the absence of on-site parking and the challenges of providing a vehicular access to serve the site, it may not be possible to provide on-site parking to serve the proposed development. In such a case, a justification for the non-provision of on-site car parking would need to accompany any planning application for the development of the site. Such a justification may include reference to the physical constraints to providing on-site parking provision and also the sustainable location of the site, which is in close proximity to Gillingham town centre and public transport services.

Sustainability

- 4.42 Proposals for the development of this site would need to show how they have taken into consideration principles of sustainable construction and design. This should be set out as part of the Planning Statement to support a planning application for development of the site. Such proposals will be expected to demonstrate how they comply with the requirements of the NPPF in terms of providing sustainable development as well as the provisions of Policy BNE4 of the Local Plan.

Developer Contributions

- 4.43 Depending upon the nature and scale of the future development of this site there may be a requirement for developer contributions. Policy S6 of the Local Plan contains a requirement for developer contributions where the need for these arises directly from the development concerned. More information on the Council's policy on such contributions including its Supplementary Planning Document "Guide To Developer Contributions" can be viewed on the Medway Council website via the following link:

<http://www.medway.gov.uk/planningandbuilding/applyforplanningpermissions/developercontributions.aspx>

- 4.44 Any prospective purchasers should refer to this to establish whether contributions would be required in relation to their proposed developments.

5.0 Planning Requirements

5.1 In addition to the minimum validation requirements as set out on the Council's website and the details set out above, any future planning application should, dependent on the scale of the development, be accompanied by the following:

- A design and access statement;
- A planning statement;
- A heritage statement;
- A tree survey and associated arboricultural report.

6.0 Conclusion

6.1 In conclusion, it is considered that this site provides an exciting development opportunity. The most appropriate development of the site would appear to be for community facilities subject to compliance with Policy CF2 of the Local Plan. Other uses, including small-scale business or residential development, may also be suitable subject to justification in terms of paragraph 70 of the NPPF and Policy CF1 of the Local Plan.

6.2 This Statement is intended to provide guidance to prospective purchasers on the planning considerations relating to the site. It has been produced in good faith but is not binding on the position of Medway Council in its consideration of any future planning applications.

6.3 Prospective purchasers are strongly encouraged to contact Medway Council at an early stage to enable any preliminary proposals to be assessed in terms of their acceptability in planning terms. The Council welcomes and positively

encourages discussions before an applicant submits a planning application. These discussions can result in better quality applications, which stand a better chance of a successful outcome. They can provide clarity of advice and help to avoid incomplete and unacceptable applications, so saving time and money. In order that the Council can provide this service to a consistent and high standard, a charge is payable since the current statutory planning fees do not cover the cost of pre- application advice. Information on the pre-application process can be found on the Council's website via the following link:

<http://www.medway.gov.uk/planningandbuilding/applyforplanningpermission/pre-applicationadvice.aspx>

6.4 If you require further information please contact:

Development Control
Medway Council
Civic Headquarters
Gun Wharf
Dock Road
Chatham
Kent
ME4 4TR

Telephone: 01634 331700

Fax: 01634 331195

Email: planning.representations@medway.gov.uk