

PLANNING, DESIGN & HERITAGE STATEMENT

CLARENDON HOTEL, ROYAL PIER ROAD, GRAVESEND, DA12 2BE



PLANNING, DESIGN & HERITAGE STATEMENT

Change of use from Hotel (C1) to Extra Care Accommodation (C2).

The Clarendon Royal Hotel, Royal Pier Road, Gravesend, DA12 2BE



May 2023

OUR REF: M23/0301.01.RPT

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Introduction

Section 1

1.1 This Planning Statement is prepared by Tetlow King Planning on behalf of Age UK Medway (the applicant) to accompany a full planning application for the change of use of the Clarendon Royal Hotel from the current Hotel use (Use Class C1) to an Extra Care home (Use Class C2).

1.2 The description of the proposed development is as follows:

Change of use from Hotel (C1) to Extra Care accommodation (C2).

About the applicant

1.3 Age UK Medway was historically formed from the merger of Age Concern Gillingham and Strood in 2010, and the subsequent rebranding then in 2012 as Medway Age Concern. As an overall entity though it has had a presence across the Medway Towns since the 1970s and has built a strong reputation locally for quality, providing a full range of care and support services for the growing older population of the Medway Towns. The range of services has continued to expand to meet the changing needs of the local older population and to meet the Government, Local Authority and Health agendas.

1.4 The guiding principles behind its operation are to ensure that older people and adults with learning disabilities:

- have choice and control over all aspects of their lives.
- have a voice in policy and in design and commissioning of services.
- are respected, valued, involved and have a sense of purpose.
- are recognised for the contribution they make.
- receive the care they need, when they need it.

1.5 The stated ambitions of Age UK Medway are to ensure that all older people and adults with learning disabilities:

- has easy access to opportunities and activities that enable them to lead a healthy, active and fulfilling life, with the companionship and support they wish for.
- is able to and supported to express their views and be listened to on matters that affect them and on which they are about.

- knows about and has easy access to high quality, impartial and reliable information, advice and advocacy when they need it in the way they need it.
- has access to locally available high quality, and personalised health and care services that are affordable to them or free of charge.
- has enough money to live comfortably and never needs to reduce their spending on one essential to pay for another.
- lives in age-friendly communities and places where they are welcomed as active, equal participants.
- is valued for who they are and the contributions they have made and continue to make to society.
- can be themselves, is accorded equal respect, and has equal access to services, amenities and opportunities to be included.

1.6 More recently the applicant has agreed to take over the services and staff of Age UK North West following the risk of closure due to funding difficulties.

Scope of Supporting Information

1.7 It is submitted pursuant to Article 8 of the Town and Country Planning (Development Management Procedure) (England) Order 2010 and should be read in conjunction with the submitted application forms, certificates, and plans.

1.8 This statement provides a background to the proposal, together with a description of the site and surroundings. The statement demonstrates the planning merits of the proposals, having regard to relevant National and Local Planning Policy and other important material considerations, upon which it is considered this application should be determined.

1.9 By virtue of the site being a designated heritage asset, this combined planning and heritage statement also provides the requisite level of information required to inform the heritage element of the planning assessment. National and local planning policy requires that applicants and Local Planning Authorities consider the potential harm to the significance of heritage assets and their setting as part of any development proposal. In this instance, consideration must be given to the potential harm to the significance of the designated heritage assets. Due to the nature of the application and works proposed it is considered appropriate to address this within the combined statement as opposed to being provided within a separate heritage assessment.

1.10 This combined statement also performs the function of a Design & Access Statement for the purposes of validation.

1.11 The application is supported by the following plans:

- Site location plan
- Existing plans
 - Ground floor 230426-E-001
 - First floor 230426-E-002
 - Second floor 230426-E-003
 - Third floor 230426-E-004
 - Roof plan 230426-E-005
- Proposed plans
 - First floor 230426-P-002
 - Second floor 230426-P-003
 - Third floor 230426-P-004

1.12 This Planning Statement is set out as follows:

- Section 2 – sets out the context of the site and its surroundings as well as the sites planning history;
- Section 3 – sets out the details of the proposals;
- Section 4 – sets out the planning policy context and explores other material considerations;
- Section 5 – sets out the planning considerations for the application cross referencing the proposals against the planning policy context and other material considerations; and
- Section 6 – concludes that the proposals are supported by planning policy and therefore the application should be approved.

Site & Surroundings

Section 2

The Site

- 2.1 The site comprises The Clarendon Royal Hotel which is situated on the south side of Royal Pier Road. The site lies within the built-up area of Gravesend, the Gravesend Riverside Conservation Area and within the Gravesend Opportunity Area. The Clarendon Royal Hotel is a listed building, and the site itself lies adjacent to a scheduled monument. Opposite the site lies an open grassed garden area also within the ownership of the hotel.
- 2.2 The site location is shown below and includes the hotel as well as land to the north adjoining the River Thames that is currently used as an ancillary garden / social / seating area in association with the Clarendon Royal Hotel.



Figure 1: Location of Site. (Source: Google Maps)

Relevant History

- 2.3 The site has a comprehensive planning history. Much of the history relates to a decision (April 2007) by the Planning Inspectorate to grant planning consent for the conversion and extension of the hotel into residential use and the construction of a large new building on the rear car park fronting The Terrace, which accommodated 30 affordable residential units with associated car parking facilities. The rear portion of the site was subsequently sold to a registered social landlord and subsequently built out.
- 2.4 In 2008 (20080208) permission was granted for the conversion of part of the building into 20 self-contained flats, formation of a hotel reception area, use of a former kitchen area as a restaurant with the former restaurant becoming a function hall, and associated extensions to provide 13 hotel bedroom suites.
- 2.5 In 2010 (20100293) planning permission was permitted for the change of use of 20 residential units to serviced apartments (hotel suites) under Use Class C1 (Hotels) and minor works of alteration to the listed building.
- 2.6 In December 2022 planning permission was refused for retrospective consent for the continued erection of a marque (20221076) and 6 huts (20221131) for a temporary 3-year period. These had been erected on the land during the Coronavirus Pandemic under the Government's scheme to assist the hospitality trade.

Development Proposal

Section 3

3.1 This section outlines the development proposals.

Facilities and services provided

3.2 Central to the function of such schemes are the communal facilities provision on site. The facilities provided on site are already in existence with the operation of the current use of the building and include:

- Licensed bar;
- Restaurant;
- Function hall; and
- Admin area

Restriction on occupation

3.3 Occupation of the units is restricted to those aged 55 or above, with an identified or anticipated care and support need which can be met through the provision of domiciliary care by the onsite provider (Age UK Medway), and who can sustain independent living with a level of care and support.

3.4 The care provision will be provided by Age UK Medway, which is a registered provider with CQC rated "Good".

Built Development/Use

3.5 The proposed development comprises the change of use of the hotel to an extra care accommodation by Age UK Medway.

3.6 In respect to the upper floors the scheme would provide for 13 units of extra care accommodation as well as a total of 13 respite rooms arranged as follows:

- 1st floor – 5 extra care apartments and 8 respite rooms
- 2nd floor – 6 extra care apartments and 5 respite rooms
- 3rd floor – 2 extra care apartments

- 3.7 The upper floors operate as a single planning unit and would have full use of the facilities provided at ground floor level.
- 3.8 The existing ground floor layout will remain the same for the proposed change of use subject of this application. It would operate as the community hub for residents of the hotel as well as for those residents formally catered for by Age UK North West, and the wider general public as currently operated.
- 3.9 The ground floor though does not operate within the same single planning unit given that the licensed bar and restaurant operate under the terms of the 2008 consent which established the principle of the separate A3 and A4 use as existed at the time (as explicitly referenced in conditions 24 and 25). The separate A3 and A4 uses were also confirmed in the context of the 2010 consent.
- 3.10 On the basis that there are no changes to the layout of the ground floor or how it operates the application for the change of use of the building does not include the ground floor, it only therefore relates to the upper floors of the hotel.

Scale and Appearance

- 3.11 There will be no change to the scale or appearance of the hotel as the proposal only represents a change in the use of the hotel.

Landscape

- 3.12 Landscape will be unaffected, the existing garden area to the front of the hotel will also remain available for residents and patrons of the licensed bar within hotel. It is on that basis that the garden area to the front of the property is identified within the blue land and does not form part of this change of use application.

Access and Parking

- 3.13 There would be no change to the existing parking facilities for the Clarendon Royal Hotel. It is on that basis that the parking area to the front of the property is identified within the blue land and does not form part of this change of use application.

Planning Policy Framework

Section 4

Introduction

- 4.1 Statutory guidance and Development Plan policies have been important considerations in the preparation of the proposal and details of the relevant guidance against which the application is to be considered are set out below. The implications of these policies and other material considerations are addressed in Section 5 of this statement, which sets out our planning case.
- 4.2 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 an application should be determined in accordance with the development Plan unless material considerations indicate otherwise.
- 4.3 The current Development Plan for the administrative area comprises the Gravesham Local Plan Core Strategy (2014) and Saved Policies of the Gravesham Local Plan First Review (2014). Other material considerations include Supplementary Planning, the National Planning Policy Framework and Planning Practice Guidance (PPG).

Development Plan

Gravesham Local Plan Core Strategy (2014)

- 4.4 The Local Plan Core Strategy (hereafter LPCS) was adopted in 2014 and sets out the Council's strategic policies and proposals for the development and use of land within the Borough up to the period of March 2028
- 4.5 The urban area of Gravesham is identified as the primary 'Tier 1' settlement within the Borough and as such, the most sustainable location within the Borough.
- 4.6 Listed below are those policies relevant to this application:
- CS01 – Sustainable Development
 - CS05 – Gravesend Opportunity Area (3.4)
 - CS07 - Economy, Employment and Skills
 - CS09 - Culture and Tourism
 - CS10 – Physical and Social Infrastructure

- CS11 – Transport
- CS14 - Housing Type and Size
- CS19 - Development and Design Principles.
- CS20 – Heritage and the Historic Environment

[Gravesham Local Plan First Review 1994](#)

- 4.7 The only relevant saved policy from the Local Plan is set out below:

TC3 – Development Affecting Conservation Areas.

H5 - Increasing the Housing Stock by the Conversion of Existing Buildings

Material Considerations

[Supplementary Planning Guidance](#)

- 4.8 Gravesham Riverside Conservation Area Character Appraisal (2009) – Character Area 1: Royal Pier Road and The Terrace.

[Emerging Local Plan Partial Review – Site Allocations and Development management Policies Consultation.](#)

- 4.9 Gravesham Borough Council are preparing a Local Plan Partial Review which is at Regulation 18 (Stage 2). A consultation ran from 23 October to 31 December 2020.
- 4.10 The emerging Plan is at a relatively early stage of development and has yet to be tested at Examination as such it should be attributed no weight in the assessment of this application.

[National Planning Policy Framework \(2021\)](#)

- 4.11 In July 2021 the Government published the latest National Planning Policy Framework (NPPF) which sets out its objectives for securing sustainable economic growth and the approach for ‘plan making’ and ‘decision taking’ for all planning policy in England. Full regard must be had to the NPPF (2021) as an overarching material consideration in the determination of this application.
- 4.12 At the heart of the NPPF is a presumption in favour of sustainable development, encompassing social, economic and environmental roles. The approach to sustainable development involves making the necessary decisions now to realise the vision of stimulating economic growth, maximising wellbeing and protecting our environment, without negatively impacting on the ability of future generations to do the same.

4.13 Paragraph 8 of the NPPF states that under this approach, planning is expected to deliver:

- A strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; by identifying the provision of infrastructure (Economic role);
- Strong, vibrant, and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible local services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being (Social role); and
- Contribute to protecting and enhancing of our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy (Environmental role).

4.14 The presumption in favour of sustainable development means that planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.

4.15 Furthermore, paragraph 8 confirms that these roles are interdependent and need to be pursued in mutually supportive ways.

4.16 In considering planning applications, paragraph 38 requires local planning authorities to *"approach decisions on proposed development in a positive and creative way"*. It goes on to state that *"Decision-makers at every level should seek to approve applications for sustainable development where possible"*.

4.17 Section 5 deals with delivering a sufficient supply of homes and makes it clear that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, and that this includes those required for older people. Older people are defined in the footnotes to the NPPF as *"people over or approaching retirement age, including the active, newly retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs."*

- 4.18 Section 6 deals with building a strong, competitive economy. It makes clear at Paragraph 81 that decisions should help create the conditions in which business can invest, expand, and adapt. It clearly identifies that *“significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.”*
- 4.19 Section 11 relates to making effective use of land. Paragraph 119 confirms that the planning system should *“promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions”*.
- 4.20 Chapter 12 of the Framework seeks to achieve well-designed places, and in this regard is key in the assessment of the proposed development. In particular, paragraphs 126, 127 and 130 which collectively seek to ensure that developments will function well and add to the overall quality of the area, are visually attractive and are sympathetic to local character, among other listed objectives.
- 4.21 Chapter 16 relates to conserving and enhancing the historic environment. Paragraph 195 states that, *“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 (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”*
- 4.21 Paragraph 197, states *“in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affecting, including any contribution made by their setting. The level of detail should be proportionate to the assets importance and not more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.”*
- 4.21 Paragraph 201 goes on to state that *“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”*

National Planning Practice Guidance

- 4.22 Planning Practice Guidance published in March 2014 (“PPG”) is a ‘live’ document that builds on the principles and provides further detailed technical guidance to complement the NPPF.
- 4.23 The PPG reinforces the importance of the NPPF as representing the most up-to-date Government planning policy, which must be taken into account where it is relevant to a planning decision.
- 4.22 Planning permission will usually be required for any material changes of use, or for temporary uses that are incorporated as part of a longer-term development. (Paragraph: 003 Reference ID: 66-003-20190722)
- 4.23 In relation to housing the PPG states that *“Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people.”* (Paragraph: 006 Reference ID: 63-006-20190626).
- 4.24 Extra Care housing is defined as *“This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24 hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.”* (Paragraph: 010 Reference ID: 63-010-20190626)
- 4.25 In term of heritage the PPG states that *“Applicants are expected to describe in their application the significance of any heritage assets affected, including any contribution made by their setting (National Planning Policy Framework paragraph 189). In doing so, applicants should include analysis of the significance of the asset and its setting, and, where relevant, how this has informed the development of the proposals. The level of detail should be proportionate to the asset’s importance and no more than is sufficient to understand the potential impact of the proposal on its significance.”* (Paragraph: 009 Reference ID: 18a-009-20190723).
- 4.26 The PPG goes on to state that *“The vast majority of heritage assets are in private hands. Thus, sustaining heritage assets in the long term often requires an incentive for their active conservation. Putting heritage assets to a viable use is likely to lead to the investment in their maintenance necessary for their long-term conservation. It is important that any use is viable, not just for the owner, but also for the future*

conservation of the asset: a series of failed ventures could result in a number of unnecessary harmful changes being made to the asset.” (Paragraph: 015 Reference ID: 18a-015-20190723)

Planning Assessment

Section 5

- 5.1 This section of the statement provides a justification for the proposal having regard to the relevant planning policy background, the character of the local area and the site's planning history.

Principle of Development

- 5.2 The proposal map to the adopted Local Plan designates the application site within the built-up area of Gravesend, the Gravesend Conservation Area and within the Gravesend Opportunity Area. The Clarendon Royal Hotel is also a listed building, and the site is adjacent to a scheduled monument.
- 5.3 LPCS Policy CS01 sets the strategic objectives for the borough which includes a focus of development in accessible and sustainable locations, utilising existing infrastructure and promoting the presumption in favour of sustainable development contained in the NPPF.
- 5.4 As stated above, the site also falls within one of the boroughs four Opportunity Areas. The concept of Opportunity Areas has been developed by the Council to establish a broad framework within which development can take place and an overall vision can be realised. The Opportunity Areas together form a significant regeneration area in the Thames Gateway, extending along the whole of the urban riverside and its hinterland and occupying almost a third of the built-up area of Gravesham.
- 5.5 The Gravesend Town Centre Opportunity Area will be the principal focus for town centre related economic and social activity in the Borough. This will be achieved by consolidating the existing retail area, encouraging a mix of employment and residential uses, improving its role as a transport hub by the creation of a public transport interchange, promoting an evening economy through giving support to the provision of leisure uses and taking full advantage of its heritage and riverside setting.
- 5.6 Policy CS05 - Gravesend Town Centre Opportunity Area amongst other criteria states within the Opportunity Area the Council will support and enhance retail, leisure, entertainment, cultural and tourism provision in accordance with the sequential approach.

5.7 The NPPF requires local planning authorities to set out a clear economic vision and strategy for their area to encourage sustainable economic growth. LPCS policy CS07 outlines the vision for the economy. It notes (Para. 5.1.4) that the Council aims to:

- *make Gravesham a place where enterprise can thrive in a sustainable and responsible way;*
- *build on its strengths to increase economic diversity so that the local economy is more adaptable and resilient to change; and*
- *facilitate the provision of education and skills training to enable local people to prosper by taking advantage of the employment opportunities that arise.*

5.8 The existing hotel business has struggled both before, during and after Covid. The recent refusals of planning permission for the marquee and huts on the land opposite has further weakened the business.

5.9 Despite there being an ‘in principle’ support for the marquee and huts, they were refused.

5.10 LPCS Policy CS14 promotes the delivery of a “*mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community such as families with children, older people and people with a disability.*”

5.11 The SHMA recommends that the building of market housing particularly suited to the needs of older households and other special needs groups should be encouraged. Para 5.10.5 Core Strategy states that this also includes the provision of specialist and extra care housing. It goes on to state that it is important that housing to meet the needs of older people is provided in accessible locations close to services.

5.12 LPCS Policy CS14 Housing Type and Size states that “*5.10.10 Sheltered housing and extra care housing for people with special needs will be supported on suitable sites in areas with access to a range of services that provide for the needs of future occupants.*”

5.13 The site is ideally situated for older residents being immediately to the north of the Town Centre boundary and close to numerous shops, services, areas of open space and transport links.

Conservation and Heritage

5.14 As stated above, the site lies within the Gravesend Riverside Conservation Area and is adjacent to a scheduled monument. In addition, the Clarendon Royal Hotel is itself a Grade II Listed Building.

- 5.15 Turning first to the Conservation Area. The Council is required by section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of a Conservation Area when exercising planning functions relating to development within that area. The Council must give considerable importance and weight to the desirability of preserving the significance of the conservation area, and there is a strong presumption against the grant of permission for development that would harm its heritage significance.

- 5.16 The significance of a heritage asset is defined in the NPPF as being made up of four main constituents: architectural interest, historical interest, archaeological interest and artistic interest. The assessments of heritage significance and impact are normally made with primary reference to the four main elements of significance identified in the NPPF.

- 5.17 In addition, LPCS Policy CS20 relates to heritage and the historic environment. The preamble to Policy CS20 notes that *“in addition to their cultural, architectural and historic importance, these assets have the potential to act as a significant draw for inward investment and heritage led regeneration. This is both through the enhancement of their settings and the creation of a more interesting and attractive place to live, work and visit”*.

- 5.18 Policy CS20 also notes *“proposals and initiatives will be supported which preserve and, where appropriate, enhance the significance of the Borough’s heritage assets, their setting where it contributes to the significance of the asset and their interpretation and enjoyment, especially where these contribute to the distinct identity of the Borough”*.

- 5.19 As set out in the Riverside Conservation Area Appraisal, the Conservation Area encompasses a long stretch of the Thames River frontage to the east of the town of Gravesend. The western part of the Conservation Area includes the later 19th century houses along The Terrace, Royal Pier Road and Clarendon Road which were developed on the site of the former Terrace Gardens.

- 5.20 The appraisal acknowledges (within Section 5.2) that in the west of the Conservation Area in The Terrace, Royal Pier Road and Clarendon Road comprises a more formal urban arrangement with rows of terraced two storey houses with front gardens.

- 5.21 The Conservation Area includes a range of landmark buildings. Landmark buildings all make an impression on the streetscape, either through their impact on the landscape,

their historic character, their scale and their position in large open spaces. Principal positive views include those from Royal Pier Road towards the Clarendon Royal Hotel.

- 5.22 Within the Conservation Area the site falls just outside Character Area 1: Royal Pier Road and The Terrace, it notes this is an urban streetscape setting, but one mixed with large official buildings and public open spaces fronting the riverside close by. The principal feature of the built form is, amongst other criteria, the urban riverside character.
- 5.23 In terms of the listed building and the scheduled monument, there would be no material change of use of the land affecting the designation as it presently operates as both a licensed bar and restaurant with residential use on the upper floors. The proposal would retain this, albeit the residential element in a different use class but without any changes to the built fabric. As such the use would not have any impact on the listed building or the scheduled monument. The subtle change in the residential nature of the site would be extremely limited.
- 5.24 It is therefore concluded that the proposed development will not result in any detrimental harm to the designated heritage assets and therefore accords with the requirements of the development plan and the Framework. The public benefits relating to the provision of specialist accommodation for the elderly for which there is a clear need, as well as a viable long term use to secure the existing licensed bar and restaurant, outweigh any perceived harm that may be deemed to apply (albeit our case is that there is no harm given that the works only relate to repurposing existing rooms) such that there are no justified reasons on heritage grounds to oppose the proposals.

Character and Appearance

- 5.25 Section 12 of the NPPF relates to design and underscores the importance of design to the built environment, stating that good design is an important component to the pursuit and delivery of sustainable development. The thrust of this is reflected primarily in Policy CS19 – Development and Design Principles which states that new development will be visually attractive, fit for purpose and locally distinctive. It also states that development should conserve and enhance the character of the local built, historic and natural environments, integrate well with the surrounding local area and meet anti-crime standards.
- 5.26 The proposed development does not result in any external changes to the building or how the ground floor uses operate in connection with the gardens located to the north

of the building. It is therefore considered that the proposed change of use will have no impact on the character and appearance of the building or the immediate area.

Neighbour Amenity

- 5.27 It is considered that there would be no significant impact on the amenities of any neighbouring residential occupiers by virtue of the change of use. The nearest residential dwellings are those opposite and adjacent to the Clarendon Royal Hotel.
- 5.28 The existing bar and restaurant (confirmed as separate use classes under the terms of the earlier consent) will remain as part of the proposed change of use. The gardens to the north of the building will remain part of the overall site but there is no change to their use hence being excluded from the application red line boundary. Controls already exist over the operation of the bar and restaurant, and indeed the external seating area within the garden, such as to ensure no detrimental impacts to the amenity of neighbours.
- 5.29 Moreover, the proposed change of use provides the means to viably operate the entire building therefore removing the need for the previous marquee and huts subject of the more recent applications that were dismissed in part due to impacts on neighbouring amenity.

Access and Parking

- 5.30 The wider site (area in the blue land) provides the parking for the existing building. There would be no change to the existing parking facilities for the Clarendon Royal Hotel.

S106 Heads of Terms

- 5.31 The application for the change of use relates to provision of C2 specialist accommodation. In order to secure this use, it is envisaged that a legal agreement will be provided that include:
- Occupation restrictions in view of the Class C2 nature;
 - Requirement for health assessments for primary residents;
 - Definition of the basic care package including minimum 2 hours of care; and
 - Provision of communal facilities on site.
- 5.32 These matters will be sufficient to confirm that the units will operate as Class C2.

Conclusion

Section 6

- 6.1 There is 'in principle' support for the proposed development at both national and local policy levels.
- 6.2 The existing ground floor uses would remain as part of the change of use, merely doubling up to further support the proposed change of use without affecting existing public access.
- 6.3 The change of use of the upper floors does not result in any development only the reclassification of the intended use. There is therefore no impact to the character and appearance of the listed building or the immediate area. The use would not have any impact on the listed building or the schedule monument.
- 6.4 There is a clearly recognised need for the provision of specialist accommodation for older people that would be met by the proposed development. The provision here will sustain the future of the wider heritage asset which has suffered due to the impacts on the hospitality sector since COVID19 impacts most recently.
- 6.5 The proposals would therefore support an existing business and promote an evening economy, taking full advantage of its heritage and riverside setting supporting the vision and objectives of LPCS policies CS05 and CS07.