

Thanet District Local Plan Examination

April to May 2019

Further Statement by Lee Evans Planning
On behalf of East Kent Hospitals University NHS
Foundation Trust

**Matters 14 - Community Infrastructure (Policies SP01, SP36-SP40 and CM01-
CM04)**

Main Issue 2 Community Infrastructure Policies SP36-SP40

Issue 2 Community Infrastructure – Policies SP36-SP40

The wording of the Pre-Submission Publication Draft Thanet Local Plan - 2031 (the draft Local Plan) refers to the NPPF 2012. Paragraph 214 of the NPPF 2019 notes that *“The policies in the previous Framework published in March 2012 will apply for the purpose of examining plans, where those plans were submitted on or before 24 January 2019.”* However, as wording of Local Plan policies may need to reflect current Government guidance we have referred to both Frameworks in our submission.

East Kent Hospitals University NHS Foundation Trust (the Trust) is currently in the process of undertaking a strategic review of all its services and hospitals in East Kent to ensure efficient service provision into the future. As the review is in its inception stages there are no outcomes at this point in time. Given the increase in housing proposed in Local Plans across East Kent the Trust requires room for reconfiguration and expansion at all of its major hospital sites to allow it to future proof its service provision and meet the healthcare needs of a rising and aging population.

Question 1:

*What is the justification for allocating land as an extension to the QEQM Hospital under Policy SP37?
What effect will this policy have on the Green Wedge in this location?*

Previous planning applications have permitted extensions out into the green belt on either side of the proposed allocation for the Hospital, including:

- TH/05/0414 - Erection of 98 No. residential units of staff accommodation comprising 1 No. two and three storey block, 8 No. three storey blocks, 5 No. 2 storey blocks and 1 No. four storey block, together with 150 No. car parking spaces, vehicular access from the existing hospital site, emergency only access from Ramsgate Road, including associated facilities, estate management office, launderette, community room for residents, and communal landscaped areas and play facility. Granted Permission 25/03/2008 (Appendix 3)

- TH/16/1114 - Erection of a 32no. bed annexe to care home together with service road and parking. Granted Permission 20/01/2017 (Appendix 4)

This has already extended the urban edge in this location, therefore, it is submitted that the allocation amounts to infilling within this gap, which will provide for expansion, reconfiguration, upgrading and improvement to the health services provided on the site. This will allow the Trust flexibility to adapt to changing needs in accordance with the requirements of the NPPF2012 paragraphs 156 and 162 and paragraph 20 of NPPF2019. It is submitted that, given the development on either side of the allocation, the hospital's further expansion in this direction will have no greater impact on the visual amenity of the green wedge than the buildings already in this location. It should also be noted that there is no other land available in the vicinity of the hospital which would provide scope for expansion and reconfiguration of its services. Parts of the hospital are also outdated and in need of updating and improvement.

Paragraph 22 of the NPPF2019 also states that strategic policies should look ahead over a minimum 15 year period. The proposed increase in housing numbers and proposals for economic growth in the district will increase pressure on the health system and on the services that the hospital currently provides. The health system is also changing with the focus on integrated care becoming stronger, as such, given the changing nature of healthcare provision, flexibility is required to allow the Trust to adapt its service provision to changing needs.

The allocation for the expansion of the hospital has also been tested through the previous local plan examination.

Question 2:

Is it clear to decision-makers, developers and local communities how proposals under policy SP37 will "involve the minimum take of fresh land"? What is the justification for this policy requirement if the land is allocated for an extension of the hospital?

As previously stated in the Trust's objection to the wording of Policy SP37 the policy as worded is ambiguous. It is requested that this wording is removed as it is not justified. It is suggested that if the Council is concerned about efficient use being made of the land that the policy could be amended in

line with the NPPF2019 requirement to make efficient use of land as proposed the amendments proposed in the Trust objection at Appendix 1 and below.

Question 3:

Is Policy SP37 deliverable within the plan period? Does it adequately allow for the continued improvement, expansion, reconfiguration and consolidation of the hospital?

Trust is currently confident that the extent of the allocation will provide sufficient land for any necessary expansion, restructure, reconfiguration or changes to the health service provision on this site and that Policy SP37(if amended) and its associated allocation can be delivered across the course of the plan.

However, the wording of the policy does not provide adequate scope and flexibility for the long term improvement, expansion, reconfiguration and consolidation of the hospital as outlined in the Trust's objection (Appendix 1).

A proposed policy and proposed changes to the policy SP37 were outlined in the Trusts original objection to the Infrastructure strategy (Appendix 2) and the submission draft of the Thanet Local Plan (Appendix 1) and outlined below. It is respectfully requested that these proposed amendments are considered as main modifications to assist in making the Plan justified and positively prepared.

Proposed amendments to Policy SP37 and associated text

The Trust respectfully request that the Inspectors consider the modifications outlined below to the supporting text and Policy SP37 along the lines of that previously proposed by the Trust who has taken into consideration the Council's wish for efficient use of the site, which is supported by the NPPF 2019 Chapter 11. (Please note that additions are underlined and removals are struck through).

5.5 The Council recognises the importance of the QEQM Hospital and the range of health services it provides to the community of Thanet District and the population of the wider area of East Kent. The Council is working closely with the relevant health providers in order to understand the requirements for the future of the hospital site. The continued improvement, expansion, reconfiguration and consolidation of the hospital and related services is, therefore, supported in principle. The main area of land available lies to the south-east of the existing hospital. As such this land is identified on the policies map for the future expansion of the hospital to meet future needs to the south-east of the existing hospital. Part of this land was previously designated as Green Wedge land, but has been released exceptionally to meet the health and social needs of local people so the Council will support medical and health related development on this land. However, in order to safeguard the Green

~~Wedge in the longer term, new development at the hospital should involve the minimum fresh land take necessary. Accordingly~~

~~5.5a The Council will expect all elements of detailed expansion proposals to make the most efficient use of the existing and allocated site. This should include appropriate use of multi-storey development as far as is compatible with the effective working of the site and the creation of a pleasant environment for both patients and staff, and while limiting visual impact on the adjacent Green Wedge and countryside.~~

~~5.6 To minimise the visual impact of new development on the Green Wedge, it would be desirable for open less densely developed uses, such as car parking, to be located on the allocated land site rather than amongst the high density development within the existing hospital. Existing tree screens along Ramsgate Road and along the footpath should be retained wherever possible. In the interests of sustainable pedestrian and cycle movement it is desirable that a direct route as direct as possible is retained for the existing footpath connecting Ramsgate Road with St Peter's Road.~~

~~5.7 The hospital has frontages to Ramsgate Road and St Peter's Road, both of which are Primary Distributors in the local road hierarchy, and where it is important to maintain free flow of cross-town and longer distance traffic. As the hospital is already a major generator of traffic in the area when supporting improvements and expansion of the hospital are proposed it is essential that the opportunity be taken to rationalise and improve consideration needs to be given to current access arrangements, traffic generation and sustainable travel. In accordance with the relevant transport policies in chapters 6 and 18 specific proposals will be required to undertake reflect a traffic impact assessment, of such proposals and to incorporate suitable access improvements to accommodate any resultant increases in traffic and appropriate access for 'Blue Light' vehicles and potentially necessitate the implementation of a Green Transport Strategy for the hospital.~~

~~5.8 The hospital is already a major generator of traffic in the area, and the Council will wish to see the implementation of a Green Transport Strategy for the hospital, which can be implemented in parallel with development permitted by this Policy. An essential element of this Strategy should be to encourage the greater use of public transport by staff and visitors. The recent construction creation of new staff accommodation on site should help to work towards this objective.~~

Policy SP37 - QEQM Hospital, Margate

~~Land to the south-east of the existing QEQM Hospital, Margate, is identified for release for expansion of the hospital. No other development will be permitted on this site.~~

~~Development for hospital purposes should meet the following criteria:~~

- ~~1. Proposals should be designed to involve the minimum take of fresh land, consistent with the need to provide a pleasant environment for patients and staff;~~
- ~~2. Development proposals should demonstrate how more effective use can be made of the hospital site as a whole;~~
- ~~3. Proposals should incorporate the retention of the existing footpath and provision of a substantial landscaping screen;~~
- ~~4. Proposals should incorporate a comprehensive review of access arrangements associated with the hospital and access provision should reflect the findings of a specific traffic impact assessment;~~
- ~~5. Proposals should be compatible with a green transport strategy for the hospital;~~
- ~~6. The level of car parking associated with new development should be limited to the minimum necessary within the context of the green transport strategy; and~~
- ~~7. New parking areas should, as far as possible, be located on the newly allocated site.~~

The Council will support proposals to improve, expand, reconfigure and consolidate the range of medical facilities available at the QEQM Hospital. To provide for this land to the south-east of the existing QEQM Hospital, Margate, is identified for health related development. The Council will support the provision of new medical and health related facilities on the site subject to compliance with other relevant plan policies and the following:

- Proposals should be designed to make the most efficient use of land while taking into account the need to provide a pleasant accessible environment for staff and patients and considering the visual impacts on the adjacent Green Wedge and countryside.
- As appropriate, proposals should provide for the retention of the existing footpath connecting Ramsgate Road with St Peter's Road and appropriate landscaping planting to provide screening.

Word count not including appendices - 1915

Appendix 1: Submission on Thanet Local Plan submission draft

Submission on Thanet Local Plan submission draft

This objection has been phrased in terms of the National Planning Policy Framework 2012 (NPPF 2012) because:

- Annex 1 of the National Planning Policy Framework 2018 (NPPF 2018) paragraph 214 states that the previous framework (2012) will apply for the purposes of examining plans submitted by 24 January 2019
- The Thanet District Council (TDC) Local Development scheme 2/7/18 chapter 3 anticipates submission stage of the Local Plan as October 2018 with examination to commence in February 2019.

However, mention is made of the new NPPF 2018 as well, as this has been referred to in some of the Council evidence base documents.

The objection is made on behalf of the East Kent Hospitals University NHS Foundation Trust (the Trust) with respect to The Queen Elizabeth the Queen Mother Hospital (QEQM). The Trust is responsible for 5 hospitals over 5 districts:

- The Queen Elizabeth the Queen Mother Hospital, Margate, Thanet District
- The William Harvey Hospital, Willesborough, Ashford
- The Kent and Canterbury Hospital, Canterbury, Canterbury District
- Buckland Hospital, Dover, Dover District
- Royal Victoria Hospital, Folkestone, Folkestone and Hythe District
- As well as services at Estuary View Medical Centre in Whitstable, Canterbury District

The NPPF 2012 states in paragraph 162 that in the production of its local plan a Local Planning Authority should work with other authorities to assess the quality and capacity of infrastructure for health and its ability to meet forecasted demands and take account of the need for strategic infrastructure. Paragraph 156 states that the strategic priorities for an area should be set out in a local plan including strategic policies to deliver health, community and social infrastructure. Paragraph 178 outlines the duty to co-operate on issues that cross boundaries particularly those relating to the strategic priorities set out in paragraph 156. Paragraph 179 states that:

'Local Planning Authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans. ...'

NPPF 2018 (paragraph 20) identifies a range of strategic issues that need to be addressed through Local Plan strategy and strategic policies, including c) *community facilities (such as health, education and cultural infrastructure)*. Paragraphs 24 – 27 outline the requirements for maintaining effective cooperation in particular:

Paragraph 25 – *'Strategic policy making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies including... infrastructure providers ...'*

Paragraph 26 – *'Effective an on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary ...'*

The Queen Elizabeth the Queen Mother Hospital (QEQM) provides emergency, acute and other health services to East Kent with a catchment area of the districts of Thanet, Canterbury and Dover and to some extent for specialist services to residents of Ashford and Folkestone and Hythe. Given that the Trust runs hospitals across 5 districts and the services provided from this hospital cover

residents from more than one district any development or changes on the site will also have effects beyond the district of Thanet.

Therefore, it is submitted that policy SP37 and its associated allocation is considered strategic and as such consultation and engagement should have taken place with the Hospital and the Trust in land allocation and designations and formulating the policy to ensure that it meets their long term strategic needs.

The Council's Duty to Co-Operate Statement includes healthcare under infrastructure as one of its Key Strategic Issues for co-operation in paragraph 9.1 and in paragraph 9.46 states that one of the key organisations that the Council sought to engage was the Health Authority with respect to future requirements for QEQM. However, the Council's statement does not make any reference to engagement of consultation with the trust and beyond representations made on previous renditions of the plan the Trust is not aware of any engagement that has taken place with respect to future requirements for QEQM nor with respect to the changes to the reduction in the size of the allocation or the formulation of the policy.

The Council's Annual Monitoring Review 2017 states that the CCG has been consulted with respect to healthcare provision but not the Trust. The CCG have oversight of the wider health outcomes for the population within their district. However, the CCG are made up primarily of GP's and while they may buy services from hospitals they do not necessarily understand the strategic and day to day operational requirements of the hospitals in their areas. The NHS Foundation Trusts provide and operate the ambulance services, emergency care services, and associated hospital and mental health services and it is therefore submitted that they are the principal organisation that understands their strategic requirements and as such should be consulted during the production of a Local Plan and its policies.

It is, therefore, contended that TDC has not fully complied with its duty to co-operate with respect to the Trust as a strategic healthcare provider.

Changes

Undertake consultation with the Trust with respect to the strategic requirements of the QEQM Hospital in relation to Local Plan policy formation.

This objection has been phrased in terms of the National Planning Policy Framework 2012 (NPPF 2012) because:

- Annex 1 of the National Planning Policy Framework 2018 (NPPF 2018) paragraph 214 states that the previous framework (2012) will apply for the purposes of examining plans submitted by 24 January 2019
- The Thanet District Council (TDC) Local Development scheme 2/7/18 chapter 3 anticipates submission stage of the Local Plan as October 2018 with examination to commence in February 2019.

However, mention is made of the new NPPF 2018 as well, as this has been referred to in some of the Council evidence base documents.

The objection is made on behalf of the East Kent Hospitals University NHS Foundation Trust (the Trust) with respect to The Queen Elizabeth the Queen Mother Hospital (QEQM).

The background to this **objection** is that the Proposed Revisions to Draft Local Plan (Preferred Options) 2017 did not include a policy with respect to the QEQM Hospital which is a primary employer and main healthcare provider in East Kent and therefore provides a vital piece of strategic health infrastructure. The NPPG paragraph 12-018 (now relocated to Plan-making Guidance) stated that key infrastructure requirements on which delivery of the plan depends should be contained in the Local Plan itself. Therefore, the Trust objected to its non-inclusion (as attached).

In 2017 Lee Evans Planning on behalf of the Trust submitted proposed wording for supporting text and a policy as follows:

The Council recognises the importance of the QEQM Hospital and the range of services it provides for the community for Thanet District and the population of the wider area of East Kent. The Council is working closely with the relevant health providers in order to understand the requirements for the future of the hospital site. The continued improvement, expansion, reconfiguration and consolidation of the hospital is, therefore, supported in principle. The main area of land available lies to the southeast of the existing hospital and medical and health related development will be supported there.

Trust proposed POLICY 32A - QEQM HOSPITAL, MARGATE

The Council will support proposals to improve, expand, reconfigure and consolidate the range of medical facilities available at the QEQM Hospital. To provide for this land to the south-east of the existing QEQM Hospital, Margate, is identified for health related development. The Council will support the provision of new medical and health related facilities on the site subject to compliance with other relevant plan policies.

While the Trust support the inclusion of a policy with respect to the QEQM Hospital and its associated allocation, they object to the wording of Policy SP37 submission publication draft of the Thanet District Local Plan (2018) and the supporting text (paragraphs 5.5-5.8).

In the submission publication draft of the Thanet District Local Plan (2018) the Council have simply brought forward the text and Policy CF4 with respect to the QEQM Hospital from the 2006 Local Plan. It is, therefore, submitted that this policy and its supporting text is not consistent with national policy, positively prepared, justified or effective, for the following reasons:

- The Trust was not consulted on the policy and the proposed wording put forward by the Trust in the previous consultation does not appear to have been considered.
- Reutilising text and policies from the 2006 plan means that they predate both the NPPF 2012 and the updated NPPF 2018 as well as the associated NPPG and have not been

reviewed in light of up to date national policy guidance. Nor does a 12+ year old policy necessarily meet the strategic needs of the Hospital and Trust.

- The policy and supporting text is long and its meaning unclear in places. For example what the Council will require with planning applications as the text of the policy appears to be asking for a master planning exercise, green travel plan and traffic impact assessment to be undertaken with any new development, which may not be a proportionate requirement depending on the scale of the development proposed.
- The policy is not positively worded with phrases such as “No other development will be permitted”.
- The policy is unnecessarily restrictive of the use that the allocated land can be put to (promoting car parking) and does not allow flexibility for the changing nature of hospital provision and healthcare or allow for the hospital to meet its operational needs.
- The policy is outdated and unjustified in its requirements as development of built form including dwellings has been permitted by the Council up to the new urban/green wedge boundary to the north and south of the allocated land, therefore, restricting the development of this land to an open form of development and car parking is not consistent with recent planning decisions on adjacent land. It also does not allow the Trust to make the most efficient use of land.
- The Policy is repetitive of other policies in the Local Plan and other draft and adopted documents which deal with safe and sustainable transport and travel plans (Policies SP41 and TP01), transport infrastructure (SP43) and the draft Transport Plan, car parking provision (Policy TP06) landscaping and green Infrastructure (Policy GI06), Landscape Character Areas (Policy SP23) and General Design Principles (Policy QD02).

Changes

On these grounds the Trust respectfully request that the Inspector would consider the modifications below to the supporting text and policy along the lines of that previously proposed by the Trust who has taken into consideration the Council's wish for efficient use of the site which is supported by the NPPF 2018 Chapter 11. (Please note that additions are underlined and removals are struck through.)

5.5 The Council recognises the importance of the QEOM Hospital and the range of health services it provides to the community of Thanet District and the population of the wider area of East Kent. The Council is working closely with the relevant health providers in order to understand the requirements for the future of the hospital site. The continued improvement, expansion, reconfiguration and consolidation of the hospital is, therefore, supported in principle. The main area of land available lies to the south-east of the existing hospital. As such this land is identified on the policies map for the future expansion of the hospital to meet future needs to the south-east of the existing hospital. Part of this land was previously designated as Green Wedge land, but has been released exceptionally to meet the health and social needs of local people so the Council will support medical and health related development on this land. However, in order to safeguard the Green Wedge in the longer term, new development at the hospital should involve the minimum fresh land take necessary. Accordingly

5.5a The Council will expect all elements of detailed expansion proposals to make the most efficient use of the existing and allocated site. This should include appropriate use of multi-storey development as far as is compatible with the effective working of the site and the creation of a pleasant environment for both patients and staff, and while limiting visual impact on the adjacent Green Wedge and countryside.

5.6 To minimise the visual impact of new development on the Green Wedge, it would be desirable for open less densely developed uses, such as car parking, to be located on the allocated land site rather than amongst the high-density development within the existing

~~hospital. Existing tree screens along Ramsgate Road and along the footpath should be retained wherever possible. In the interests of sustainable pedestrian and cycle movement it is desirable that a direct route as direct as possible is retained for the existing footpath connecting Ramsgate Road with St Peter's Road.~~

~~5.7 The hospital has frontages to Ramsgate Road and St Peter's Road, both of which are Primary Distributors in the local road hierarchy, and where it is important to maintain free flow of cross-town and longer distance traffic. As the hospital is already a major generator of traffic in the area when supporting improvements and expansion of the hospital are proposed it is essential that the opportunity be taken to rationalise and improve consideration needs to be given to current access arrangements, traffic generation and sustainable travel. In accordance with the relevant transport policies in chapters 6 and 18 specific proposals will be required to undertake reflect a traffic impact assessment, of such proposals and to incorporate suitable access improvements to accommodate any resultant increases in traffic and appropriate access for 'Blue Light' vehicles and potentially necessitate the implementation of a Green Transport Strategy for the hospital.~~

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- ~~2. Development proposals should demonstrate how more effective use can be made of the hospital site as a whole;~~
- ~~3. Proposals should incorporate the retention of the existing footpath and provision of a substantial landscaping screen;~~
- ~~4. Proposals should incorporate a comprehensive review of access arrangements associated with the hospital and access provision should reflect the findings of a specific traffic impact assessment;~~
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The Council will support proposals to improve, expand, reconfigure and consolidate the range of medical facilities available at the QEQM Hospital. To provide for this land to the south-east of the existing QEQM Hospital, Margate, is identified for health related development. The Council will support the provision of new medical and health related facilities on the site subject to compliance with other relevant plan policies and the following:

- 1) Proposals should be designed to make the most efficient use of land while taking into account the need to provide a pleasant accessible environment for staff and patients and considering the visual impacts on the adjacent countryside.**
- 2) As appropriate, proposals should provide for the retention of the existing footpath connecting Ramsgate Road with St Peter's Road and appropriate landscaping planting to provide screening.**

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Draft Thanet Local Plan - 2031 - Pre-Submission Publication, Regulation 19

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Comment Information

Document Section	Draft Thanet Local Plan - 2031 - Pre-S... QEQM Hospital Margate SP37 [List all comments on this document part]
Comment ID	781
Respondent	East Kent Hospitals NHS Founda... [List all comments by this respondent]
Agent	Cathy McNab - Lee Evans Planning
Response Date	04 Oct 2018
Response Type	SUPPORT
What is the nature of this representation?	Support

Comment

The East Kent Hospitals University NHS Foundation Trust **Supports** the retention of an allocation for the strategic provision of health and related services at the The Queen Elizabeth the Queen Mother Hospital (QEQM) and the relocation of the green wedge and urban boundaries to the south eastern boundary of this allocation.

Do you consider the document is Sound?

If no, Do you consider it is unsound because it is:

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the oral part of the examination?

Attachments

Officer's Response Not yet available.

Proposed Change

Notes

Appendix 2: Objection to the Infrastructure Strategy

Section 9 - New Implementation Policy

While the production of a detailed Infrastructure Delivery Plan (IDP) is supported as is the requirement outlined in the new policy for all development to meet its own physical and social infrastructure requirements, provided that the IDP fully addresses the primary and secondary healthcare requirements resulting from the development proposed by the draft Local Plan. However, the general premise that infrastructure requirements will be detailed in the IDP is of concern. The infrastructure requirements of development (especially on strategic sites) should be detailed within the policies of the draft Local Plan and should not be delegated to a non-statutory unadopted document, which carries limited weight in planning terms as at best it would be considered a material consideration.

The NPPF states in paragraph 162 that in the production of its local plan a Local Planning Authority should assess the quality and capacity of infrastructure for health and its ability to meet forecasted demands and take account of the need for strategic infrastructure. Paragraph 156 states that the strategic priorities for an area should be set out in a local plan including for the provision of health. The NPPG paragraph 12-018 states that key infrastructure requirements on which delivery of the plan depends should be contained in the Local Plan itself. It is submitted that in allocating the site through the IDP and not supporting this allocation with policy within the draft Local Plan the Local Planning authority is not planning strategically for a vital piece of strategic health infrastructure in compliance with the requirements of the NPPF and NPPG. As a primary employer and main healthcare provider in East Kent it is submitted that there should be an allocation and policy with respect to the QEQM Hospital within the draft Local Plan and that this amendment should have been included in the Proposed Revisions to Draft Local Plan (Preferred Options).

It is, therefore, requested that the site allocation (within the adopted Local Plan) be include within the draft Local Plan Proposals maps and a new policy with supporting text be inserted into the draft Local Plan. The text should explain the importance of the hospital to both the local economy and as an important health care provider for the wider east Kent community and highlight the need to ensure that the hospital can be future proofed, along the lines of:

The Council recognises the importance of the QEQM Hospital and the range of services it provides for the community for Thanet District and the population of the wider area of East Kent. The Council is working closely with the relevant health providers in order to understand the requirements for the future of the hospital site. The continued improvement, expansion, reconfiguration and consolidation of the hospital is, therefore, supported in principle.

The main area of land available lies to the southeast of the existing hospital and medical and health related development will be supported there.

POLICY 32A - QEQM HOSPITAL, MARGATE

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Other comments on Infrastructure strategy

While the statement on page of the IDP stating that the current allocation in the local plan will be carried forward into the draft Local Plan is welcomed. It is concerning that this is not referred to in a policy in the draft local plan nor is an allocation shown. Without a policy hook the allocation of land for the hospital carries little weight in planning terms.

The NPPF states in paragraph 162 that in the production of its local plan a Local Planning Authority should assess the quality and capacity of infrastructure for health and its ability to meet forecasted demands and take account of the need for strategic infrastructure. Paragraph 156 states that the strategic priorities for an area should be set out in a local plan including for the provision of health. The NPPG paragraph 12-018 states that key infrastructure requirements on which delivery of the plan depends should be contained in the Local Plan itself. It is submitted that in allocating the site through the IDP and not supporting this allocation with policy within the draft Local Plan the Local Planning authority is not planning strategically for a vital piece of strategic health infrastructure in compliance with the requirements of the NPPF and NPPG. As a primary employer and main healthcare provider in East Kent it is submitted that there should be an allocation and policy with respect to the QEQM Hospital within the draft Local Plan and that this amendment should have been included in the Proposed Revisions to Draft Local Plan (Preferred Options).

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The Council recognises the importance of the QEQM Hospital and the range of services it provides for the community for Thanet District and the population of the wider area of East Kent. The Council is working closely with the relevant health providers in order to understand the requirements for the future of the hospital site. The continued improvement, expansion, reconfiguration and consolidation of the hospital is, therefore, supported in principle.

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Appendix 3: Planning decision TH/05/0414

Thanet District Council

Notification of Grant of Permission to Develop Land

Town and Country Planning Act 1990
Town and Country Planning (General Development Procedure) Order 1995

To: East Kent Hospitals NHS Trust
c/o: Tim Magee Devereux Architects Ltd
200 Upper Richmond Road
Putney
London
SW15 2SH

F/ TH/ 05/0414

TAKE NOTICE that THANET DISTRICT COUNCIL, the District Planning Authority under the Town and Country Planning Acts, has **granted permission** for:

Proposal: Erection of 98 No. residential units of staff accommodation comprising 1 No. two and three storey block, 8 No. three storey blocks, 5 No. 2 storey blocks and 1 No. four storey block, together with 150 No. car parking spaces, vehicular access from the existing hospital site, emergency only access from Ramsgate Road, including associated facilities, estate management office, launderette, community room for residents, and communal landscaped areas and play facility.

Location: QEQM HOSPITAL, ST. PETERS ROAD, MARGATE, CT9 4AN

referred to in your application for permission for development validated 15/07/2005.

The reason for the grant of permission is that:

In the view of the District Planning Authority and having taken all material considerations into account there is insufficient demonstrable harm arising from the proposal to warrant withholding planning permission.

In coming to this decision regard has been had to the following policies:

Thanet Local Plan Policies - CF4, D1, D2, TR16, EP4, SR17, SR5, SR6, HE11, HE12

Kent and Medway Structure Plan Policies - QL1, QL7, TP19, HP5

This permission is SUBJECT TO the conditions specified hereunder:

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

GROUND:

In accordance with Section 91 of the Town and Country Planning Act 1990 (as amended by Section 51 of the Planning and Compulsory Purchase Act 2004).

- 2 No development shall take place until the applicant or their agents or successors in title has secured the implementation of a programme of archeological work in accordance with a written specification and timetable which has been submitted to and approved by the Local Planning Authority.

GROUND:

To ensure that features of archaeological interest are properly examined and recorded in accordance with Policy HE12 of the Thanet Local Plan.

- 3 If during development works any contamination should be encountered which was not previously identified then the additional contamination shall be fully assess and an appropriate remediation scheme submitted to the Local Planning Authority for approval. Remedial measures shall then be carried out in accordance with the approved methodology.

GROUND:

To prevent harm to human health and pollution of the environment, in accordance with Thanet Local Plan Policy EP4

- 4 All imported soil and clay brought into site must be certified to be suitable for use. To demonstrate this, a sample of the imported material must be analysed for potentially harmful contamination by a suitably accredited laboratory. Details of the proposed sampling dates, times, quantities and the laboratory to be used must be submitted to and approved in writing by the Local Planning Authority prior to commencement

GROUND:

To prevent harm to human health and pollution of the environment, in accordance with Thanet Local Plan Policy EP4

- 5 Any facilities for the storage of oils, fuels or chemicals shall be sited on impervious bases and surrounded by impervious bund walls. The volume of the bunded compound should be at least equivalent to the capacity of the tank plus 10%. If there is multiple tankage, the compound should be at least equivalent to the capacity of the largest tank or the combined capacity of interconnected tanks, plus 10%. All filling points, vents, gauges and sight glasses shall be located within the bund. The drainage system of the bund shall be sealed with no discharge to any water course, land or underground strata. Associated pipework should be located above ground and protected from accidental damage. All filling points and tank overflow pipe outlets should be detailed to discharge downwards into the bund.

GROUND:

To prevent pollution of the water environment in accordance with Thanet Local Plan Policy EP1.

- 6 Prior to being discharged into any water course, surface water sewer or soakaway system, all surface water drainage from parking areas and hardstandings shall be passed through an oil interceptor designed and constructed to have a capacity compatible with the site being drained. Roof water shall not pass through the interceptor.

GROUND:

To prevent pollution of the water environment in accordance with the Thanet Local Plan Policy EP1.

- 7 In accordance with the deposited phasing plan: 3424/L/001/P3 RevH and plan 3424/L/016/P1 RevB the refuse storage areas shown to be provided shall be constructed and be operational prior to the first occupation of any units identified within each phase being brought into use, unless otherwise agreed in writing by the

Local Planning Authority.

GROUND:

In the interests of the amenity of future occupiers and the visual amenity of the area in accordance with Policy D1 of the Thanet Local Plan

- 8 In accordance with the deposited phasing plan: 3424/L/001/P3 RevH the areas shown for the parking and manoeuvring of vehicles and turning area shall be operational prior to the first occupation of any of the units identified to be provided within each phase being brought into use, unless otherwise agreed in writing by the Local Planning Authority. The areas agreed shall thereafter be maintained for that purpose.

GROUND:

In the interests of highway safety in accordance with Isle of Thanet Local Plan Policy D1.

- 9 The access road shown to be constructed from Ramsgate Road shall only be used by construction traffic during the course of the implementation of the development hereby approved, and shall thereafter be retained solely for use in the case of an emergency, and at no time shall the road be used to obtain direct access into the subject side by residents, visitors, or deliveries, nor shall it be used to obtain access through to the hospital or as an access into adjoining agricultural land.

GROUND:

In the interests of highway safety and to secure the proper development of the site in accordance with Policy D1 of the Thanet Local Plan.

- 10 Prior to the first occupation of any units hereby approved details of the arrangements to be made to ensure access is restricted to emergency services only along the emergency access road off Ramsgate Road shall be submitted to, and agreed in writing by, the Local Planning Authority, and shall thereafter only be undertaken in accordance with those details approved.

GROUND:

In the interests of highway safety and to secure the proper development of the site in accordance with Policy D1 of the Thanet Local Plan.

- 11 Following completion of the phase 1 works as identified on drawing ref: 3424/L/001/P3/RevH, a timetable for the commencement of phase 2 works shall be submitted to the Local Planning Authority, in the event that this timetable indicates that phase 2 works will not commence within a period of 18 months from the date of completion of phase 1 then the area of vegetation which has been removed along the Ramsgate Road frontage to facilitate access during the construction phase shall be reinstated in accordance with the submitted plan D1331.L.300RevB.

GROUND:

In the interest of the visual amenity of the area in accordance with Policy D1 and D2 of the Thanet Local Plan.

- 12 Washer/dryers shall be installed within each unit hereby approved prior to the first occupation unless otherwise agreed in writing by the Local Planning Authority.

GROUND:

In the interests of the amenity of the future occupiers in accordance with Policy D1 of the Thanet Local Plan

- 13 Prior to the commencement of the use of the new access into the site from the main hospital the traffic calming measures shown to be provided on drawing 3424/L/001/P3 RevH to control vehicle speeds at the point where the new access crosses the public right of way shall have been provided and be fully operational these measures shall thereafter be retained unless otherwise agreed in writing by the Local Planning Authority.

GROUND:

In the interests of highway safety in accordance with Policy D1 of the Thanet Local Plan.

- 14 The occupation of the residential units hereby approved shall be limited to a person solely employed at the adjoining hospital outlined blue on the submitted location plan drawing number 3424D04B, or a spouse or dependent of such a person during the course of their employment at the hospital. The residential units shall not be sold or otherwise let to persons who are not in sole employment at the hospital.

GROUND:

The site has been released as an exception to the normal policy of restraint in the countryside for the specific purpose of providing for the expansion of the facilities at the hospital in accordance with policy CF4 of the Thanet Local Plan.

- 15 The hard and soft landscaping works including boundary treatments shall take place in accordance with the submitted landscape phasing plan 3424/C/010/P1 RevA and detailed landscaping plans 3424/L/001/P3 RevH and D1331.L.300RevB and in accordance with the applicants agents letter dated 26 June 2007, unless otherwise agreed in writing by the Local Planning Authority.

GROUND:

In the interests of the visual amenities of the area and to adequately integrate the development into the environment in accordance with Policy D2 of the Thanet Local Plan.

- 17 In the event that any trees or plants which within a period of 5 years from the date of completion of each landscaping phase as identified on drawing 3424/C/010/P1 RevA die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of a similar size and species, unless the Local Planning Authority gives any written consent to any variation.

GROUND:

In the interests of the visual amenities of the area in accordance with Policy D2 of the Thanet Local Plan.

- 19 Existing trees, shrubs and hedgerows identified for retention within the development site or existing trees growing on an adjacent site, likely to be affected by the development, shall be protected in accordance with BS 5837 1991 using the following protective fence specification:-

Chestnut paling fence 1.2m in height, to BS 1722 part 4, securely mounted on 1.7m x 7cm x 7.5cm timber posts driven firmly into the ground. The fence shall be erected below the outer most limit of the branch spread or at a distance equal to half the height of the tree, whichever is the furthest from the tree, unless otherwise agreed in writing with the Local Planning Authority.

The protective fencing shall be erected before the works hereby approved or any site clearance work commences, and shall thereafter be maintained until the development has been completed.

At no time during the site works shall building materials, machinery, waste, chemicals, stored or piled soil, fires or vehicles be allowed within the protective fenced area.

Nothing shall be attached or fixed to any part of a retained tree and it should not be used as an anchor point.

There shall be no change in the original soil level, nor trenches excavated within the protective fenced area.

GROUND:

In the interests of the visual amenities of the area and to adequately integrate the development into the environment, in accordance with Thanet Local Plan Policy D1.

- 20 The existing public right of way which adjoins the site shall be safeguarded and maintained free of obstruction both during the course of development and subsequent to completion.

GROUND:

To ensure the protection of this public amenity in accordance with policy SR17 of the Thanet Local Plan.

- 21 Prior to the commencement of development of phase 2 details of the surfacing materials to be used in the construction of the access roads, footpaths and car parking areas shall be submitted to, and approved in writing by, the Local Planning Authority prior to the commencement of any works. Development shall only take place in accordance with details approved.

GROUND:

In the interests of visual amenity in accordance with Policy D1 of the Thanet Local Plan.

- 22 Phase 1 of the development hereby approved shall be constructed of the materials shown on the submitted drawings 3424/L009/P1; 3424/L/016/P1RevB; 3424/L/104/P3RevC & 3424/L119/P3 RevC as amended by applicants agents e-mail dated 15 June 2007 confirming the bricks to be Ibstock Laybrook Sevenoaks Multi Yellow stock.

GROUND:

In the interests of visual amenity in accordance with Policy D1 of the Thanet Local Plan.

- 23 Prior the first occupation of any of the units identified within Phase 1 being brought into use, the cycle storage facilities as shown on the submitted drawings 3424/L/001/P3 RevH and 3424/L/018/P1 RevA shall be provided and thereafter retained.

GROUND:

In the interests of encouraging the opportunities for cycling in accordance with policy TR12 of the Thanet Local plan.

- 24 Prior to the commencement of development of phase 2 details of the location and provision to be made for the storage of cycles for this phase of the development shall be submitted to, and approved in writing by the Local Planning Authority. Development shall only take place in accordance with details approved.

GROUND:

In the interests of encouraging the opportunities for cycling in accordance with policy TR12 of the Thanet Local plan.

- 25 Prior to the commencement of development of phase 2, details of the proposed materials for use of the external finish of the buildings shall be submitted to and approved in writing by the Local Planning Authority. Development shall only take place in accordance with details approved.

GROUND:

In the interests of visual amenity in accordance with Policy D1 of the Thanet Local Plan.

- 26 The proposed development shall be carried out in accordance with the submitted application as amended by the revised drawings numbered 3424/D/04 RevC; 3424/L/001/P3 RevH; 3424/C/010/P1 RevA; D1331.L.300 RevB; 3424/D/05 RevG; 3424/D/06 RevC; 3424/D/07 RevC; 3424/ D/08 RevC; 3424/I/104/P3 RevC; 3424/D/021 Rev A; 3424/L/112/P3 RevC; 3424/ D/022 RevA; 3424/D/023/RevA; 3424/L/119/P3 RevC; 3424/D/028; 3424/D/029; 3424/D/025 RevB; 3424/D/024 RevB; 3424/D/027; 3424/D/026; 3424/D/030 RevA; ME001 RevP6; ME002 RevP1; 408 RevP3; 401 RevC1/D; 400 RevP3D; 3424L/018/P1 RevA and in accordance with the submitted landscape management plan.

GROUND:

To secure the proper development of the area.

Informative

For the avoidance of doubt this planning permission is subject to the obligations set out in the unilateral undertaking submitted as part of this application dated 18 December 2007.

Dated: 25/03/2008

Thanet District Council
P.O. Box 9
Cecil Street
Margate
Kent CT9 1XZ

Signed



B White
Head of Development Services

NOTES
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PILGRIMS
HOSPICE

RAMSGATE ROAD

DENE WALK

SUMMARY OF ACCOMMODATION:

98no. flats for staff accommodation comprising:

- 54no. 4B (4P) flats @ 85 sqm ea (Block type B + C).
- 22no. 2B (3P) flats @ 55 sqm ea (Block type A).
- 20no. 1B (2P) flats @ 40 sqm ea (Block type A).
- 2no. 1B (2P) flats @ 42 sqm ea designed for wheelchair bound residents (Block Type A - Red).

All entrance level accommodation to be wheelchair accessible. Level entry thresholds, door and corridor widths in compliance with Part M.

150no. Car Parking Spaces inc 6no. spaces for disabled users

B	27.06.05	Amended following comments.	27.06.05
A	24.06.05	Site Reconfiguration	24.06.05
		PLANNING	31.03.05
Rev	By	Date	Check

SCALE 1:250

DEVEREUX
ARCHITECTS
200 UPPER RICHMOND ROAD LONDON SW15 2SH
TEL : +44(0)20 8780 1800 FAX : +44(0)20 8780 2646
E-MAIL : design@devereux.co.uk www.devereux.co.uk

CLIENT

Geoffrey Osborne Limited
Wray Coppice
Oaks Road, Reigate
Surrey,

PLANNING
105 / 414

PROJECT
Staff Accommodation Project
Queen Elizabeth Queen Mother
Hospital,
Margate, Kent

TITLE

First Floor Level
Site Plan

PLANNING DEPARTMENT
RECEIVED
1 JUL 2005

SCALE @ N

1:250

PLANNING

LEVEL	NAME	SUBJECTIVE	DATE
LEVEL 1	NAME		
LEVEL 2	TC Magee		30 Mar 05

LEVEL	DATE
LEVEL 1	

REVISION NUMBER	REVISION
3424	D 06 B

Appendix 4: Planning Decision TH/16/1114

Thanet District Council

Notification of Grant of Permission to Develop Land
Town and Country Planning Act 1990
Town and Country Planning (Development Management Procedure)
Order 2015



To: Michael Yoakley Charity
c/o: HMY LLP
Hazle McCormack Young LLP
3 Turnagain Lane
Palace Street
Canterbury
Kent
CT1 2ED

F/TH/16/1114

TAKE NOTICE that **THANET DISTRICT COUNCIL**, the District Planning Authority under the Town and Country Planning Acts, has **granted permission** for:

PROPOSAL: **Erection of a 32no. bed annexe to care home together with service road and parking**

LOCATION: **Yoakley House, Drapers Close, MARGATE, Kent, CT9 4AH,**

In coming to this decision regard has been had to the following policies:
Thanet Local Plan Policies:

- D1 Design Principles**
- CC5 Green Wedges**
- CF4 QEQM Hospital Margate**
- TR12 Cycling**
- TR16 Car Parking Provision**

The application was processed having regards to the National Planning Policy Framework, which requires that where there are potential solutions to problems arising in relation to dealing with planning applications, the Council will work with applicants in a positive and proactive manner to seek solutions to those problems.

The permission is SUBJECT TO the conditions specified hereunder:

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

GROUND:

In accordance with Section 91 of the Town and Country Planning Act 1990 (as amended by Section 51 of the Planning and Purchase Act 2004).

- 2 The proposed development shall be carried out in accordance with the submitted application as amended by the revised drawings numbered 1841 016 Rev P2 and 1841 017 Rev P2, received 21 December 2016, the revised drawings numbered 1841 020 Rev P2,

1841 010 Rev P2, and 1841 011 Rev P2, received 04 October 2016, and the submitted drawings numbered 1841 012 Rev P1, 1841 013 Rev P1, and 1841 015 Rev P1, received 11 August 2016.

GROUND:

To secure the proper development of the area.

- 3 No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of:
- (i) archaeological field evaluation works in accordance with a specification and written timetable which has first been submitted to and approved in writing by the Local Planning Authority; and
 - (ii) following on from the evaluation, any safeguarding measures to ensure preservation in situ of important archaeological remains and/or further archaeological investigation and recording in accordance with a specification and timetable which has been submitted to and approved in writing by the Local Planning Authority.

GROUND:

To ensure that features of archaeological interest are properly examined and recorded in accordance with the advice contained within the National Planning Policy Framework.

- 4 Prior to the first occupation or use of the development, the area shown on the deposited plan for the parking, loading/unloading and manoeuvring of vehicles shall be operational prior to any part of the development hereby approved being brought into use. The area agreed shall thereafter be maintained for that purpose.

GROUND:

In the interests of highway safety

- 5 Prior to the first use of the development hereby permitted, the vehicular access and 2m wide footpath and footpath link into Drapers Close, as shown on the approved plans numbered 1841 022 Rev P2, and 1841 020 Rev P2, shall be completed and thereafter maintained (this must include the cutting back of the existing hedges as shown on the approved plan).

GROUND:

In the interests of highway safety and sustainability.

- 6 Prior to the first use of development hereby permitted, details of secure cycle parking facilities, to include a minimum of 6no. cycle parking spaces, shall be submitted to and approved in writing by the Local Planning Authority. The cycle parking spaces shall be provided in accordance with the approved plans and thereafter maintained.

GROUND:

In the interests of promoting increased cycling in accordance with Policy TR12 of the Thanet Local Plan.

- 7 Prior to the commencement of development hereby permitted, construction vehicle loading/unloading and turning facilities, and parking facilities for site personnel and visitors, shall be provided on site and for the duration of construction.

GROUND:

In the interests of highway safety.

- 8 No development shall take place until a drainage strategy detailing the proposed means of foul disposal and a implementation timetable, has been submitted to and agreed in writing

by the Local Planning Authority. The development shall be carried out in accordance with the approved scheme and timetable and thereafter maintained.

GROUND:

To prevent pollution in accordance with the National Planning Policy Framework.

- 9 Prior to the first use of the development hereby approved, full details of both hard and soft landscape works, to include:

- o species, size and location of new trees, shrubs, hedges and grassed areas to be planted
 - o the treatment proposed for all hard surfaced areas beyond the limits of the highway, which shall be permeable, and shall be a material other than tarmac for the internal footpaths within the site
 - o walls, fences, other means of enclosure proposed
- the ecological enhancement measures as shown within the indicative Proposed Landscape Strategy

shall be submitted to, and approved in writing by, the Local Planning Authority.

GROUND:

In the interests of the visual amenities of the area and to adequately integrate the development into the environment in accordance with Policies D1 and D2 of the Thanet Local Plan

- 10 All hard and soft landscape works shall be carried out in accordance with the approved details. The works shall be carried out prior to the of any part of the development, or in accordance with a programme of works to be agreed in writing with the Local Planning Authority. Any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of a similar size and species, unless the Local Planning Authority gives any written consent to any variation.

GROUND:

In the interests of the visual amenities of the area in accordance with Policies D1 and D2 of the Thanet Local Plan

- 11 (i) Development shall not begin until a detailed sustainable surface water drainage scheme for the site has been submitted to (and approved in writing by) the local planning authority. The detailed drainage scheme shall demonstrate that the surface water generated by this development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100yr storm) can be accommodated and disposed within the curtilage of the site through appropriately designed and constructed sustainable drainage features.

(ii) No building hereby permitted shall be occupied until details of the implementation, maintenance and management of the sustainable drainage scheme have been submitted to and approved in writing by the local planning authority. The scheme shall be implemented and thereafter managed and maintained in accordance with the approved details. Those details shall include:

- i) a timetable for its implementation, and
- ii) a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage system throughout its lifetime.

GROUND:

To ensure that the principles of sustainable drainage are incorporated into this proposal, to reduce the risk of on/off site flooding and to ensure ongoing efficiency of the drainage provisions, in accordance with the NPPF.

- 12 No infiltration of surface water drainage into the ground is permitted other than with the express written consent of the local planning authority (in consultation with the Environment Agency); this may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

GROUND:

To protect vulnerable groundwater resources and ensure compliance with the National Planning Policy Framework.

INFORMATIVES

- 1 It is the responsibility of the applicant to ensure , before the development hereby approved is commenced, that all necessary highway approvals and consents here required are obtained and that the limits of highway boundary are clearly established in order to avoid any enforcement action being taken by the Highway Authority.
- 2 The applicant/developer should enter into a formal agreement with Southern Water to provide the necessary sewerage infrastructure required to service this development. The applicant/developer should contact Southern Water, Sparrowgrove House, Sparrowgrove, Otterbourne, Hampshire SO21 2SW (Tel: 0330 303 0119) or www.southernwater.co.uk in order to progress the required infrastructure.
- 3 A formal application to requisition water infrastructure is required in order to service this development. Please contact Southern Water's Network Development Team (Wastewater) based at Atkins Ltd, Anglo St James House, 39a Southgate Street, Winchester, SO23 9EH (tel 01962 858688) or www.southernwater.co.uk
- 4 The applicant is reminded that, under the Wildlife and Countryside Act 1981, as amended (section 1), it is an offence to remove, damage or destroy the nest of any wild bird while that nest is in use or being built. Planning consent for a development does not provide a defence against prosecution under this act. Trees and scrub are likely to contain nesting birds between 1st March and 31st August inclusive. Trees and scrub are present on the application site and are to be assumed to contain nesting birds between the above dates, unless a recent survey has been undertaken by a competent ecologist to assess the nesting bird activity on site during this period and has shown it is absolutely certain that nesting birds are not present.

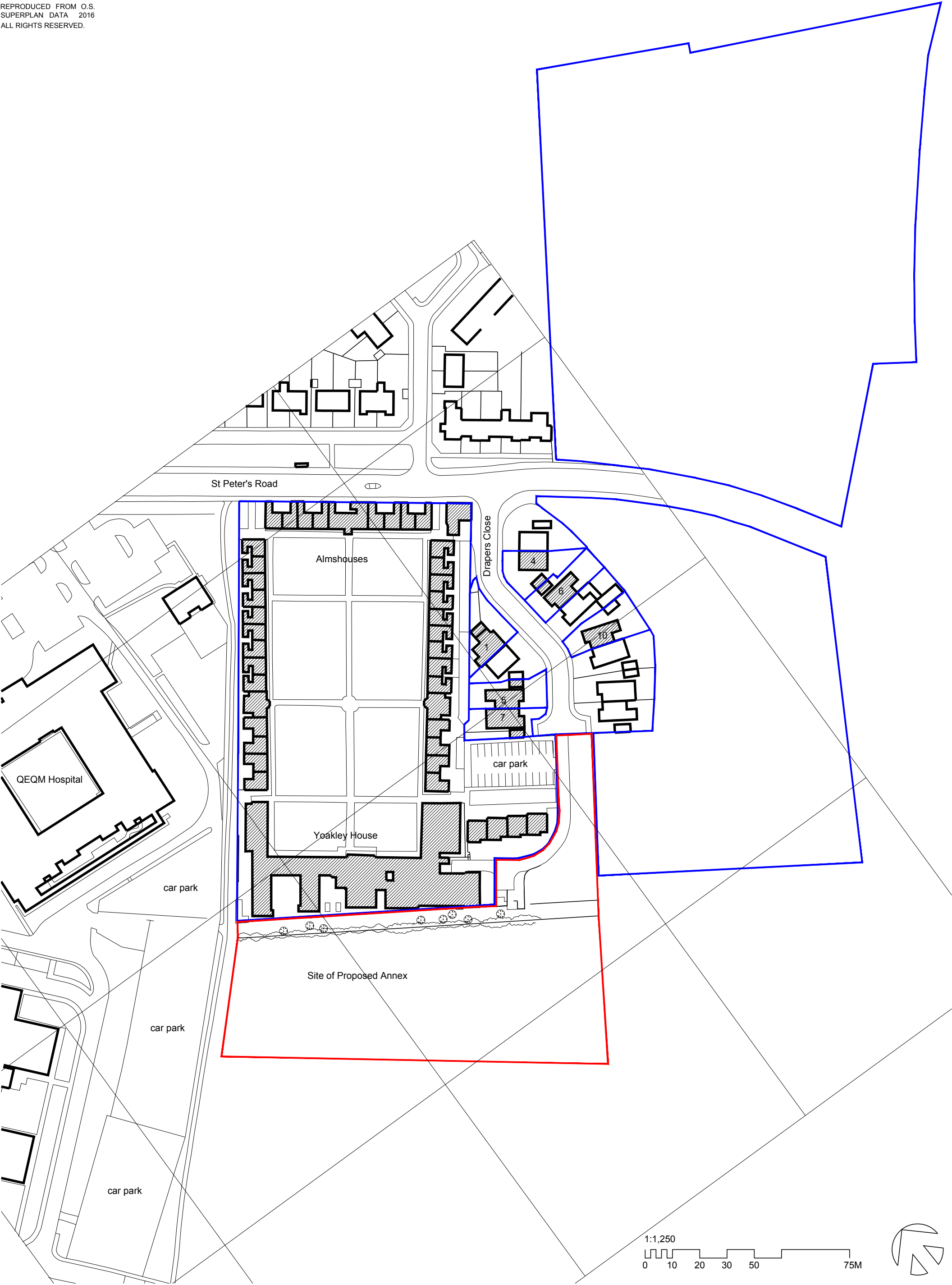
Dated: 20 January 2017

Thanet District Council
P.O Box 9
Cecil Street
Margate
Kent CT9 1XZ

Signed



Emma Fibbens
Chartered Planner

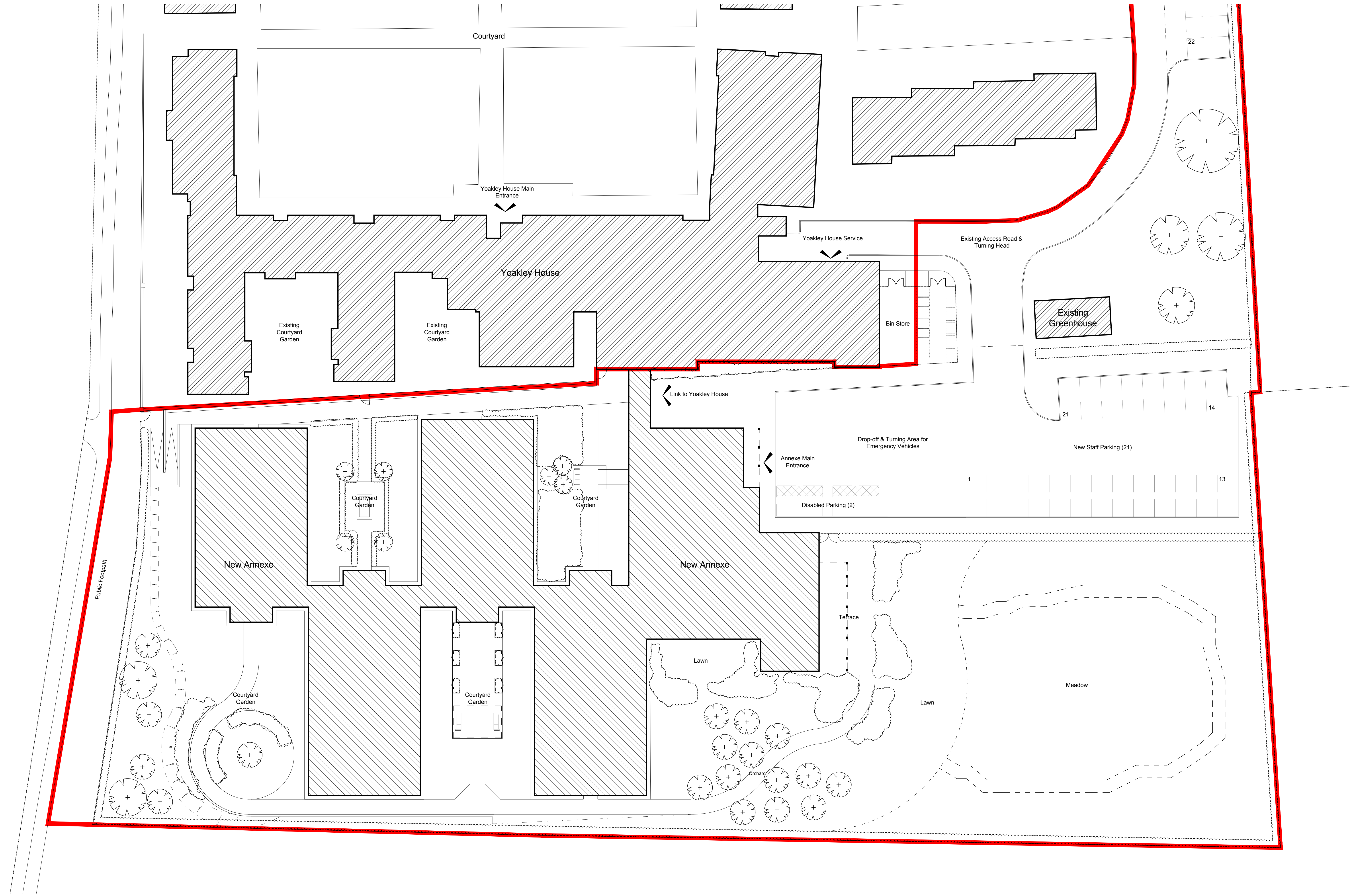


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Revisions			
P1	09.08.16	NDS	PLANNING ISSUE

Drawing Location Plan		Date July 16	
Project/Client Yoakley Care Project: New Annex Michael Yoakley's Charity		Scale @ A3 1:1250	
Job reference Drawing number 1841 001		Revision P1	Purpose of Issue Approval

HMY
HazleMcCormackYoung LLP/Chartered Architects/
3 Turnagain Lane/ Palace Street/ Canterbury/ Kent/
CT1 2ED/ T 01227 454497/ F 01227 451372



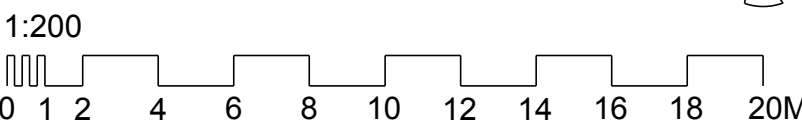
PLEASE NOTE

Revisions	NDS	PLANNING ISSUE
P1 09.08.16		

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For Sections & Elevations, please see drawings 1841_015 to 17



Drawing Proposed Site Plan		Date July 2016
Project/Client Yoakley Care Project: New Annexe Michael's Yoakley's Charity		Scale @ A1 1:200
Job reference 1841_010	Revision P1	Purpose of Issue Approval

Hazel McCormack Young LLP/Chartered Architects/
Leap House/ Frog Lane/ Tunbridge Wells/ Kent/
TN11 1YT/ T 01892 515311/ F 01892 515285

HMY