

Report of the Ashford Design Review Panel

The Flour Mill

06th May 2021

The design review meeting

Reference number	1581/210421
Date	21st April 2021
Meeting location	Online via Teams
Panel/forum members attending	Liz Gibney (Chair), Architecture, Urban design Jon Akers Coyle, Landscape Architecture, Public Realm Nimi Attanayake, Architecture, Housing Chris Bearman, Architecture, Housing Richard Portchmouth, Architecture, Urban Design
Panel manager	Nichole Avan-Nomayo, Design South East
Presenting team	Guy Hollaway, Hollaway Ben Ludlow, Hollaway Elliot Waters, Hollaway Donald Roberts, ETLA
Other attendees	Jeremy Fazzalano, Ashford Borough Council Katy Magnall, Ashford Borough Council Lesley Westphal, Ashford Borough Council Cllr Charles Suddards, Ashford Borough Council Oliver Davis, Oliver Davis Homes Reece Lemon, Hume Planning Chris Downs, Create Consulting Engineers (Flood)
Site visit	This review was carried out during the Covid-19 outbreak which started in 2020 and has continued into 2021. A digital walk-around (in a similar fashion to that which would have been conducted on-site) was carried out prior to the review, including presentation of site photos by the applicant team.
Scope of the review	As an independent design review panel, the scope of this review was not restricted.
Panel interests	Panel members did not indicate any conflicts of interest. Jon Akers Coyle notified us that he had worked with Hollaway Architects on one project 1.5 years ago. This was not deemed to constitute a conflict of interest.

Confidentiality This report is confidential as the scheme is not yet the subject of a detailed planning application. Full details of our confidentiality policy can be found at the end of this report.

The proposal

Name The Flour Mill.

Site location 24 East Hill, Ashford.

Site details The site is located within Ashford, at the confluence of Great Stour and East Stour rivers.
The existing site comprises the former Pledges Flour Mill, and is bounded by Mace Lane to the north, East Stour river to the east, East Hill to the west and open parkland to the south.
This historical industrial building has been through several uses and was last used as a nightclub on the ground floor and residential units above. It has remained vacant since 2013, and a car park is located on the southern end of the site, on lease to Ashford Borough council. The site is within the Ashford Green corridor, in flood zone 2 & 3, and measures approximately 0.5 ha. It is a short distance to Ashford International and Ashford Borough Council.

Proposal The development involves the part demolition, extension and refurbishment of the existing Flour Mill building into new residential apartments, a 'super lounge' (café and workspace) at ground floor and the developer's office. Additional residential units will be created in three new blocks on the site. In total 62 apartments will be provided.
Undercroft parking will be allocated within the new blocks, with additional bays around the site; and bays set aside for the council at the southern end. The proposal also includes the formation of a new riverside walk linking the Flour Mill site to an existing inaccessible island.

Planning stage Pre-Planning application.

Local planning authority Ashford Borough Council.

Planning context	<p>The unlisted Flour Mill building is close to listed buildings in East Hill.</p> <p>It is within Ashford Town Centre Conservation Area, and a nature reserve occupies the northern corner of the site. The Local Plan policy relevant to the site is Policy ENV2.</p>
Planning authority perspective	<p>The site and its immediate surroundings are an important part of Ashford. The principle of a development on this site is deemed acceptable by the authority, subject to an appropriate proposal. Concerns have been raised at pre-planning stage which the authority would like addressed at the design review about the height of the proposed new blocks and their relationship with the existing mill building.</p> <p>The building holds significant historical value in Ashford. As such, the new residential blocks must not dominate the mill building, nor have adverse impact on the adjacent conservation area, and relate appropriately to the river.</p> <p>The council is seeking further advice from the panel to address the above matters, with emphasis and clarity on sustainability, appropriate response to the site, its heritage, and the Ashford Green Corridor.</p>
Previous reviews	<p>This scheme has not previously been reviewed by this panel.</p>

Summary

The Flour Mill building and site, have great potential. However, its historic riverbank setting, location within the conservation area and relationship with long views of heritage assets require a sensitive design approach.

We are pleased the scheme came to review at this early stage in the design process. However, more work is required to achieve a site-specific scheme, based on a thorough contextual assessment, including the river and heritage, and an understanding of the existing mill building.

To help progress the scheme, we strongly recommend smaller scale design reviews are undertaken to address specific areas for design development based on the recommendations set out in this report, prior to a planning application submission.

Key recommendations

1. Strengthen the scheme to achieve an exceptional development for Ashford.
2. Provide an in-depth heritage analysis of the site's industrial background, with a detailed response in the proposal.
3. Establish a sustainability and landscape strategy to drive the development from the outset in response to the wildlife site and green corridor, the Environment Agency's flood advice and climate emergency; to include materiality, zero carbon strategy, biodiversity improvements and integration.
4. Remove the council's parking allocation on the southern end of the site, to enhance the quality of the scheme on the proviso that the developer does not reinstate parking in the area.
5. Maintain the dominance of the existing Flour Mill building, and ensure it remains the flagship building in the development.
6. Re-work the internal and external spatial configuration of the development and consider cluster and courtyard type buildings along with their various roofscapes.
7. Refine the proposed public and private realm aspects of the site.
8. Respond specifically to the different characters (industrial and tree lined) of both rivers and maximise their unique sensitivities in the landscape strategy to reveal them.

Detailed comments and recommendations

1. Context and identity.
 - 1.1. The Flour Mill site is an important part of Ashford, by virtue of its proximity to heritage assets, its conservation area setting and its industrial history. In view of this, we are concerned about the lack of contextual analysis and demonstration of how this has informed the proposal and its development to achieve a site-specific response.
 - 1.2. In addition, the design principles governing the scheme are unresolved, culminating in a loss of identity. As such, an in-depth analysis of the Flour Mill building and the site is required to inform the design narrative, depicting the site's character- the river, wildlife, and the green corridor.
 - 1.3. The new apartment blocks, together with the existing Flour Mill building, create a poignant presence in the surroundings. This raises questions about the wider visual impact on the conservation area, the listed buildings at East Hill, and Ashford Borough Council offices located to the south. To address this, a landscape visual impact assessment/analysis should be carried out from East Hill, Mace Lane, and the southern parkland.
 - 1.4. An indication of the concept of the building typology is also needed – explaining how a private rental schemes (PRS) will differ from the private sale schemes being built in Ashford.
2. Sustainability
 - 2.1. The site's natural setting and constraints underpin the need for a sustainability strategy. Its absence in the scheme is disappointing, given its location in a flood zone, the ground water vulnerability, the wildlife site, and the nature reserve along the green corridor.
 - 2.2. We note the proposed use of photovoltaics within the development, but insufficient details have been provided. The development of the Flour Mill site should embed as many sustainability measures as possible to ensure the scheme addresses the climate emergency.

3. Landscape, ecology, and biodiversity
 - 3.1. As a strategic move, we support the opportunity for an ecologically enhanced riverside walkway to meet ENV2 policy requirements, and to enhance the connection to the town's riverside green corridor.
 - 3.2. We would strongly encourage as part of the heritage assessment a greater understanding of the sectional relationship between development edge and riverine systems.
 - 3.3. The ongoing discussions with the Environment Agency (EA) at this stage is encouraging and the EA's satisfaction with the lowered ground level by the river embankment is a promising start for the scheme.
 - 3.4. We encourage the development of the river modelling exercise for discussions with the EA. The model's output will determine the environmental viability of the proposal, and this needs to be clearly demonstrated in the next design iteration.
 - 3.5. There is much to be considered regarding the external environment. In the absence of an arboricultural assessment, ecology, and biodiversity action plan, we implore the design team to begin this process to inform the design's response to the site and its link to the existing wildlife.
4. Masterplan, architecture and layout.
 - 4.1. The masterplan option brought forward for discussion works in a few aspects, for example the connecting bridges linking spaces together enhances the site's permeability from the road network. Nonetheless, the masterplan needs detailed development, with clarity on the riverside and the island's spatial quality.
 - 4.2. The notion to link East Hill to the Riverwalk through the development is commended. It could provide an attractive route, connecting the town with the river. However, the historic sense of place at the 'foot of the hill' is currently not celebrated. Aligned with a cluster-type approach, there may be precedent to explore a yard typology as the key public space within the scheme.
 - 4.3. The building composition on the masterplan and the spaces formed around the building are incongruous. We suggest cluster-type buildings or courtyards could be the best approach for the site to make a stronger connection with its inherent and historic qualities.

- 4.4. The historic relevance of the Mill, with its location at the confluence of the rivers, could be exploited much more positively to create a unique site-specific response for public realm and architecture.
- 4.5. The architectural intent of the proposed apartment blocks is not evident, and reference to the historic context lacks conviction. Therefore, as the scheme progresses, development of the architectural expression will help to enrich the proposals.
- 4.6. The unique setting of the site presents an opportunity to create views from the apartment blocks as a selling point.
- 4.7. The proposed building footprint, bulk, mass, and height dominate the presence of the Flour Mill building. We suggest that blocks B, C and D are fragmented to make them subservient to the Flour Mill building.
- 4.8. The design of the new apartment blocks is unconvincing nor is it the right response for the site. To address this, we recommend the roof form is changed and design inspiration is taken from the existing Flour Mill building.
- 4.9. Features on the existing lower mill building indicate that it may be an original part of the Flour Mill building. As such, its demolition is misconceived. Consideration should be given to restore, retrofit and maximise the rooftop area by adding an extension on top.
- 4.10. Concerns were raised around the quality of the communal circulation areas and the internal layout of the apartments. A single core with dog-leg corridors serving 10 to 14 units, is not the right model for this location.
- 4.11. Apartments which are single aspect and north facing will be undesirable from a living perspective and are likely to become undesirable from a marketing perspective. This needs to be redressed together with the reworked building typology.
- 4.12. The design team should also consider rationalising apartment types for ease of maintenance in the future.
- 4.13. The ground floor 'super lounge' needs to be developed to ensure that it does not become an underused space. There needs to be a clear hierarchy between private and public use, for example a mezzanine or roof top area for the resident's private use.

5. Parking and Bin Storage
 - 5.1. The Flour Mill site benefits from its sustainable location in Ashford. With the busy Mace Lane on the north, linking the site to the rest of the town centre and key local and international travel hubs requires an assessment of the future need for vehicles on the site.
 - 5.2. The site's good connectivity provides an opportunity to challenge the council's parking standards with fewer parking spaces in the development, and to promote pedestrian movement and cycle routes instead. This will need to be evidence based.
 - 5.3. The council's parking allocation at the southern end of the site compromises the entire development. The panel strongly advise a discussion between the client and the council to purchase this small parcel of land and integrate it into the scheme for other uses, revealing better pedestrian connections and stronger setting to the southern parkland.
 - 5.4. The under-croft parking layout is weak and needs to be replanned. It is also unclear how the vehicular access will work alongside the pedestrian routes through the site without forming barriers to the pedestrian movement.
 - 5.5. The incorporation of the bin storage in the under-croft parking area is a sensible strategy. As the scheme evolves, plans will need to show the bin store location in detail and capacity, in line with the council's design standards.
6. Materials and detailing.
 - 6.1. Information on the proposed materials and detailing was not presented at the review, thereby preventing in-depth discussions. We recommend that materials reflecting the site's industrial history are used in the scheme. Done successfully, this would help to create a development which affirms its presence in this part of Ashford.
 - 6.2. Paragraph 130 of the National Planning Policy Framework (2018) states: *'Local planning authorities should also seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme (for example through changes to approved details such as the materials used).'*
 - 6.3. The applicant team and local authority should note Design South East's general guidance on material quality and detail. At planning application stage, the quality of the detailing should be demonstrated through large scale drawings at 1:20 and 1:5 of

key elements of the building/landscape and should be accompanied by actual material samples which should be secured by condition as part of any planning approval.

7. Energy Strategy

- 7.1. The design of the development is still evolving, however, the lack of an energy strategy to drive the scheme from the outset is a concern. We advise that the design team begins this process to ensure the scheme is thoroughly considered.
- 7.2. Our guidance is that at planning, the proposal must include a clear energy strategy which details how the development will optimise thermal performance, minimise the demand for energy, supply the remaining energy requirements efficiently and optimise the use of renewables to align with the Government's emerging zero carbon policy. This strategy should be informed by detailed modelling work informed by respected calculation methods.

Confidentiality

If the scheme was not the subject of a planning application when it came to the panel, this report is offered in confidence to those who attended the review meeting. There is no objection to the report being shared within the recipients' organisations provided that the content of the report is treated in the strictest confidence. Neither the content of the report, nor the report itself can be shared with anyone outside the recipients' organisations. Design South East reserves the right to make the content of this report known should the views contained in this report be made public in whole or in part (either accurately or inaccurately). Unless previously agreed, pre-application reports will be made publicly available if the scheme becomes the subject of a planning application or public inquiry. Design South East also reserves the right to make this report available to another design review panel should the scheme go before them. If you do not require this report to be kept confidential, please inform us.

If the scheme is the subject of a planning application the report will be made publicly available, and we expect the local authority to include it in the case documents.

Role of design review

This is the report of a design review panel, forum or workshop. Design review is endorsed by the National Planning Policy Framework and the opinions and recommendations of properly conducted, independent design review panels should be given weight in planning decisions including appeals. The panel does not take planning decisions. Its role is advisory. The panel's advice is only one of a number of considerations that local planning authorities have to take into account in making their decisions.

The role of design review is to provide independent expert advice to both the applicant and the local planning authority. We will try to make sure that the panel are informed about the views of local residents and businesses to inform their understanding of the context of the proposal. However, design review is a separate process to community engagement and consultation.

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Report of the Ashford Design Review
Panel

The Flour Mill, Ashford

27th September 2021

The design review meeting

Reference number	1678/090921
Date	9 th September 2021
Meeting location	Online via Teams
Panel/forum members attending	Liz Gibney (Chair), Architecture, Urban design Jon Akers Coyle, Landscape Architecture, Public Realm Nimi Attanayake, Architecture, Housing
Panel manager	Kieran Toms, Design South East
Presenting team	Guy Hollaway, Hollaway Ben Ludlow, Hollaway Matt Whitby, Hollaway Donald Roberts, ETLA Georgia Foy, Icen Projects Oliver Davis, Oliver Davis Homes Reece Lemon, Hume Planning
Other attendees	Alex Stafford, Ashford Borough Council Jeremy Fazzalano, Ashford Borough Council Katy Magnall, Ashford Borough Council Cllr Michael Burgess, Ashford Borough Council Michelle Krawczyk, Central Ashford Community Forum
Site visit	This review was carried out during the Covid-19 outbreak which started in 2020 and has continued into 2021. A digital walk-around (in a similar fashion to that which would have been conducted on-site) was carried out prior to the first review, including presentation of site photos by the applicant team.
Scope of the review	As an independent design review panel, the scope of this review was not restricted, although as a second review there was a focus on how the applicant team had responded to the comments from the first review.
Panel interests	Panel members did not indicate any conflicts of interest. Jon Akers Coyle notified us that he had worked with Holloway Architects on one project 1.5 years ago. This was not deemed to constitute a conflict of interest.

Confidentiality

This report is confidential as the scheme is not yet the subject of a detailed planning application. Full details of our confidentiality policy can be found at the end of this report.

The proposal

Name	The Flour Mill.
Site location	24 East Hill, Ashford.
Site details	<p>The site is located within Ashford, at the confluence of Great Stour and East Stour rivers. The existing site comprises the former Pledges Flour Mill, and is bounded by Mace Lane to the north, East Stour river to the east, East Hill to the west, and open parkland to the south. This historical industrial building has been through several uses and was last used as a nightclub on the ground floor with residential units above. It has remained vacant since 2013, and a car park is located on the southern end of the site, on lease to Ashford Borough council. The site is within the Ashford Green corridor, in flood zone 2 & 3, and measures approximately 0.5 ha. It is a short distance to Ashford International and Ashford Borough Council.</p>
Proposal	<p>The development involves residential development comprising the conversion and extension of the existing 'Pledges' Flour Mill and the erection of two additional blocks (A and B) with access, undercroft parking, and associated infrastructure, communal lounge, gym and working areas on ground floor. In total, 58 apartments, of 1 and 2 beds, will be provided.</p>
Planning stage	Pre-Planning application.
Local planning authority	Ashford Borough Council.
Planning context	<p>The unlisted Flour Mill building is close to listed buildings in East Hill. It is within Ashford Town Centre Conservation Area, and a nature reserve occupies the northern corner of the site. The Local Plan policy relevant to the site is Policy ENV2.</p>
Planning authority perspective	<p>The Local Authority's position is that whilst the principle of the conversion is supported, the site has a number of constraints and issues that need to be resolved before it will become clear if an acceptable and policy compliant scheme can be developed, and that issues such as flooding remain outside the Councils scope of influence. The panel think that the applicant needs to demonstrate that the advice of the original DRP has been genuinely addressed to overcome the policy constraints.</p>

Previous reviews This scheme was previously reviewed by the Ashford Panel in April 2021. Following this review, the panel advised that more work was required to achieve a site-specific scheme, based on a thorough contextual assessment, including the river and heritage, and an understanding of the existing mill building.

Summary

The response is much improved and there has been a positive response to the panel's previous comments.

High-quality historical analysis has informed the approach in a positive way. Developing a clear landscape masterplan and better defining the approach to the site's open spaces is the next key step for this proposal, along with exploration of the options for the building materials.

If these steps are informed by a similarly robust level of analysis, there is the potential for this to be an exceptional response to an exceptional site.

Key recommendations

1. Make sure the riverside walk is usable for pedestrians, cyclists as well as being a space to linger in.
2. Improve the approach to the site from the car park in the west, giving it an attractive feeling of arrival.
3. Make the frontages as active as possible, particularly along the key pedestrian and cycle routes through the site.
4. Define the courtyard spaces, ensuring they work for their intended functions.
5. Ensure the material choices fit in with both the retained and new buildings.

Detailed comments and recommendations

1. Context and master plan

- 1.1. The proposal is well informed by historical analysis, and has enhanced the exceptional qualities of the site, particularly its historic character. The mill tower, surrounded by blue and green elements, has the chance to be exceptional and make the most of this site.
- 1.2. The amendments to the layout, including the removal of the council's parking allocation on the southern end of the site, work well in pulling apart the blocks and creating permeability, interesting spaces between blocks, and more breathing space overall. However, the courtyard spaces are somewhat incoherent, and should either be more enclosed spaces or more open ones – at the moment they sit uncomfortably between the two.
- 1.3. Views along the riverside walk from the perspective of pedestrians and cyclists should be provided to show how the walk, the building and the setting will interrelate. At the moment there is a risk that the presence of the gym and car park along the river will feel alienating and will lead to too much inactive frontage. Moving the gym should be considered as it could allow the southern courtyard to be more generous and lighter.

2. Building

- 2.1. The work on the existing flour mill building is excellent and the relationship between the thorough historical analysis and the design decisions is strong. The forms of the new buildings work well, and it is appropriate that their height matches the tallest subsidiary building previously. The retention of the slight shoulder on the east face of the building helps to emphasize the singularity of the tower.
- 2.2. There is a strong perpendicular façade fronting onto the park. This needs to be a foil to the tower, in a similar manner to the previous white façade shown on historic imagery.
- 2.3. The east façade feels too glazed which risks contrasting too heavily with the existing building. A reduction in the amount of glazing here should be explored.
- 2.4. The introduction of a duplex is supported as it creates a distinct character and a different kind of space.

- 2.5. Introducing dark bricks where the fire was could be a way of subtly acknowledging this part of the history of the site. A range of options for proposed materials should be explored and tested.

3. Landscape and public realm

- 3.1. The children's play area and nature area could work well. Keeping this open space as public is supported as it gives space to people of Ashford, helps cement this location as significant and important to the town, and helps to bring out the qualities of the river. To improve this part of the site, giving the two sides of the river different and distinct characters could help orientation and character. Opportunities for seating and play should be maximised.
- 3.2. The proposed riverside walkway could be improved in width and alignment. It needs to be wider, as it feels too narrow for its intended character and use. Its alignment could be more deliberate forming a stronger manmade 'edge' to the river, much like the previous manipulations made to the riverbank. The walkway alignment currently seems unduly affected by flood compensation considerations and in-out nature of the buildings. There needs to be more about how it will be used, its edge condition and how the space will allow for these uses. There needs to be space to walk, cycle and linger in this space.
- 3.3. The character of the courtyards could be more defined and will require development in character, use and materiality within the landscape masterplan. The courtyards form useful breaks within the massing and provide good connectivity across the site. The character of the yards could differ from the other spaces, adding a richness to the public realm. These spaces should explore greener and resilient landscape design components such as SUDs, raingardens, and permeable pavements, that add to the connected biodiverse context of the site and significantly enhance the project's contribution to the river corridor.
- 3.4. The island has a hostile edge by the main road, and a landscape masterplan should consider how to minimise the potential negative effects of this main road.
- 3.5. The existing trees are important to the character of the space and should be retained wherever possible.
- 3.6. Wayfinding measures into and across the site will be key to site navigation and there should be more information about how this will be provided and how the site will be made legible.
- 3.7. Lighting design will play an important role in terms of sense of welcome and safety after hours, with consideration being given to the ecology and biodiversity

sensitivity of the riverside corridor. More information about lighting is required within the landscape masterplan.

- 3.8. There is a key view of the park from the south. The boundary treatment here will be important in successfully defining the site and a review of the current boundary condition (wall and shrub planting) should be carried out within landscape design explorations.

4. Access and Parking

- 4.1. At the moment the arrival space from the west feels like it will be unattractive, and is dominated by car parking. Although we recognise that there are agreements in place about parking requirements, more should be done to soften the feeling of this location and make it more appealing. There should be a feeling of arrival in the site before crossing over towards the main building. There needs to be a landscape element, to make this area more attractive, and there should be a visual link with the flour mill.
- 4.2. The approach from the south is not clear or attractive and feels overly driven by flood requirements. A straighter route to the site entrance is likely to be more appropriate, allowing more legible movement for pedestrians and cyclists. Having a less kinked route will also help to avoid narrow spaces, such as that currently by the gym.
- 4.3. A more proactive and ambitious approach to car parking could make this a place that makes a virtue and a selling point of a reduction in car usage, and attract those who would want to live a more sustainable life. Car club spaces and electric car charging points will help to achieve this.

5. Materials and detailing

- 5.1. The approach so far shows good potential, with the balconies and walkways to the tower working well. Further historical analysis approach needs to be applied to the choice materials, with an in-depth heritage analysis of the site's industrial background required. The approach to materials is important and does not necessarily need to copy other parts of Ashford. If the site is to retain its industrial feel, then this should drive the decisions, and whilst this could be different from the materials on the existing buildings it should not detract from the distinct character of the retained building. One option would be a strong modern juxtaposition that emphasizes the historic character, whilst another would be a more traditional approach. Options testing will help to demonstrate the right material choice.
- 5.2. Paragraph 135 of the National Planning Policy Framework (2021) states: *'Local planning authorities should seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of*

changes being made to the permitted scheme (for example through changes to approved details such as the materials used).'

- 5.3. In order to be consistent with this national policy, the applicant team and local authority should note Design South East's general guidance on material quality and detail. At planning application stage, the quality of the detailing should be demonstrated through large scale drawings at 1:20 and 1:5 of key elements of the building/landscape and should be accompanied by actual material samples which should be secured by condition as part of any planning approval.

6. Energy strategy

- 6.1. The approach to energy efficiency was not discussed in great detail at this review. Our guidance is that at the planning application stage the proposal must produce a clear energy strategy which details how the development will optimise thermal performance, minimise the demand for energy, supply the remaining energy requirements efficiently and optimise the use of renewables in order to align with the Government's emerging zero carbon policy. This strategy should be informed by detailed modelling work informed by respected calculation methods.

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The logo for Design South East, featuring a stylized yellow shape that resembles a speech bubble or a map outline of the region, with the text "Design South East" inside in a bold, sans-serif font.

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