



Appeal Decisions

Site visit made on 14 January 2026

by **Tom Bristow BA MSc MRTPI**

an Inspector appointed by the Secretary of State

Decision date: 16th April 2026

Appeal A Ref: APP/Z2260/W/25/3370118

San Clu Hotel, Victoria Parade, Ramsgate CT11 8DT

- The appeal is made under section 78 of the Town and Country Planning Act 1990 as amended (the '1990 Act') against a refusal to grant planning permission.
 - The appeal is made by Ameeco Holiday Apartments Ltd. against the decision of Thanet District Council.
 - The application is ref. F/TH/24/0678.
 - The development proposed is described on the application form as the 'Erection of a five storey extension, opening up of existing basement, to provide 19 self-contained residential units, spa, coffee shop, function room and conference facilities, following the creation of a new entrance and demolition of an existing extension and out building'.¹
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Appeal B Ref: APP/Z2260/Y/25/3370119

San Clu Hotel, Victoria Parade, Ramsgate CT11 8DT

- The appeal is made under section 20 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended (the 'LBCA') against a refusal to grant listed building consent.
 - The appeal is made by Ameeco Holiday Apartments Ltd. against the decision of Thanet District Council.
 - The application is ref. L/TH/24/0679.
 - The works proposed are described on the application form as in respect of Appeal A.
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Decisions

1. The appeals are dismissed.

Application for costs

2. I address the appellant's application for an award of costs against the Council separately.

Preliminary matters

The site and its context

3. The San Clu, ambiguously indicated in the list entry to trace its origins to 1873 or 1883, is grade II listed.² It faces seawards with expansive views. The coast is nearby beyond Victoria Parade, the clifftop esplanade at East Cliff, beneath which are Granville Marina and Marina Esplanade at the foot of substantial cliffs (shored up historically with sloping masonry walls, with various subsequent interventions).
4. As is typical of the Georgian and Victorian eras, properties hereabouts tend to be arranged in a rough grid around loose squares. As it now stands, the San Clu occupies much of the south-eastern frontage of the square of which it is part. That square is bounded by Victoria Parade to the south-east, Thanet Road to the north-east, Albert Road to the south-west,

¹ Alternatively, as on the Council's decision notice, the 'erection of a five storey extension and opening up of existing basement to provide 10 self-contained residential units and 9No aparthotels, spa, coffee shop, function room and conference facilities, following the creation of a new entrance and demolition of an existing extension and out building'.

² List entry no. 1086071, which operated as the Comfort Inn until 10 March 2023.

and Truro Road to the north-west. The plot of the listed building encompasses a significant proportion of the square overall, much of which is given over to parking and a miscellany of utilitarian buildings. It extends to that of no. 77 Thanet Road, and to a twitten running initially off Truro Road beside a garage by no. 75 Thanet Road which thereafter heads to the rear of grade II listed nos. 3, 5, 7, 9, 11 and 13 Albert Road (nos. 3-13).³

5. The list entry explains that the Hotel 'was originally called Granville Terrace, part of the redevelopment of Mount Albion House estate, most of which was undertaken by Edward Welby Pugin (for himself and for Edmund Davis), who may have designed this building, although stylistically remote from his other work here. Originally twice the length, half the building [was] destroyed 1928'. Originally, and therefore for a period of some 45 to 55 years, the listed building would have spanned the entire south-eastern frontage of the square. Instead there is now open space,⁴ a garden if you like, by the corner of Victoria Parade and Albert Road (where the footprint of the remainder of the now-lost terrace would have been).
6. Judging by the myriad local representations against the scheme, that open space is seen as valuable locally. In part that appears on account of its openness. There is, relatively, a tighter grain of development prevailing nearby (particularly where rows of terraces predominate to the north-west). The garden has also evidently also functioned as, or has become in the minds of many, something of a community gathering space. There appear to be comparatively few public gardens or public houses in the immediate vicinity of the appeal site. Nonetheless, the garden is within the ownership of the San Clu. Although it would be perhaps cutting off its nose to spite its face, there appears to be nothing to prevent the garden from being closed or reserved to use by hotel residents alone.
7. The relative lack of similar public spaces and public houses nearby is, in all likelihood, a consequence of the historic legacy of the area (in essence a speculative redevelopment of a landed estate orchestrated by private investment). Insofar as many local residents are concerned, the garden arose, and has existed now for some 98 years, serendipitously. Nonetheless, Ramsgate is not in want of public open spaces, expansive views or a relaxed atmosphere; the expansive esplanade at East Cliff being literally a stone's throw away.
8. Although an oversimplification of the legacy that different eras have left, much of Ramsgate emerged as a refined late Georgian society resort.⁵ In that respect, Ramsgate owes much to the designs and enterprise of Augustus Pugin and his son Edward (both advocates, with different influences and emphases, of Gothic Revival architecture).
9. As reflected in the Ramsgate Conservation Area Appraisal (published 31 March 2022) and in Historic England's publication 'The town and its seaside heritage' (published 21 April 2020), it is difficult to overstate the degree of historic intervention and conscious design at Ramsgate. Even various ostensibly natural elements of the environment are somewhat artifice.⁶ As attested to by the San Clu itself, the architectural heyday of the Town blurred into an eastwards and westwards expansion during the Victorian era.
10. Returning to the square in which the San Clu sits, occupying the remainder of the south-western flank are nos. 3-13 Albert Road, a terrace very much in a Gothic Revival mould. The relevant list entry again attributes them to the designs of Edward Pugin, and to originating around 1860 (although that is likely too early a date). Based on what I saw during my site visit, and information provided by the Council at appeal related to their planning history,⁷ none of nos. 3-13 appear to have remained as single dwellings. As with

³ List entry no. 1336649.

⁴ With the exception of a featureless single storey addition (as shown on plan no. 419-110 REV B).

⁵ Georgian as referring to the era; Ramsgate possessing an amalgamation of Georgian, Regency, and other aesthetics.

⁶ Including the nature of the cliffs by the esplanade at East Cliff and Pulhamite rock arrangements towards the Harbour.

⁷ Correspondence of 7 January 2026.

many historic properties, they were designed to a grand scale (which has, over time, become to some extent a liability as much as an attribute).

11. No. 3, Braemuir, appears to have previously been arranged as five flats,⁸ and thereafter to have operated as a hotel and house in multiple occupation.⁹ It appears currently to be arranged as a self-contained basement flat with the upper floors occupied as one entity.¹⁰ No. 5 appears to have previously arranged as varying numbers of flats.¹¹ At the time of my site visit, and notwithstanding ongoing renovation, it appeared occupied as 3 flats or maisonettes (signed nos. 2, 3 and 4). Continuing along Albert Road, no. 7 appeared to be 5 flats, nos. 9-11 or 'Pierpont Court' occupied as 10 flats, and no. 13 as a further 5 flats.
12. The exact number of dwellings set out above may not be entirely accurate (for example if external signage does not accord with current layouts).¹² Nevertheless the current arrangement of nos. 3-13 illustrates a clear trend. Those properties were originally designed as 6 dwellings. Setting aside any domestic staff that they may once have accommodated, those properties now appear to be occupied, or capable of occupation by some 25 households. Whilst it is unclear which properties, or which elements of properties, are occupied on a more-or-less permanent basis or as holiday accommodation, that is essentially by-the-by.
13. Completing a picture of the square here, beyond the plot of the San Clu the remainder of the north-eastern flank of is occupied by semi-detached nos. 75 and 77 and their plots. They appear inter-war in aesthetic. Whilst not shown in the Ordnance Survey Map of 1931 reproduced at figure 9 to the appellant's Heritage Impact Assessment ('HIA'),¹³ they again reflect a process of intensification hereabouts. Properties on the opposite side of the square along Truro Road,¹⁴ appear either late Victorian or Edwardian in aesthetic (although nos. 12, 14 and 16 may be of later construction emulating an earlier style).
14. At a broader scale, the square to the north-east is occupied by grade II listed Coastguard Cottages, which the list entry indicates originated around 1865.¹⁵ Unsurprisingly they are more modest in scale and arranged around a horseshoe with the south-eastern flank open to allow for seawards views. The square beyond that is occupied by grade II* listed East Court, which the list entry indicates was constructed around 1889-1890 in something approaching an arts-and-crafts aesthetic for Sir William Wills (later Lord Winterstoke).¹⁶ Winterstoke Gardens nearby the latter marks the eastern limits of the Ramsgate Conservation Area hereabouts, which otherwise covers an extensive and irregular swathe of the Town including the appeal site (extending as far as West Cliff Road and Grange Road to the west).
15. Close by, instead to the south of the garden at the San Clu, are a pair of heraldic stone lions at the esplanade at East Cliff (Victoria Gardens as it appears on certain mapping).¹⁷ The list entry notes that they 'are identical to those used as finials on the Granville Hotel, which bear the Pugin motto: En Avant, and are either from that building or else part of Edward Welby Pugin's general redevelopment scheme of this area in the late 1860's'. They may well have been relocated from elsewhere historically, and in any event signify little more than ostentatious accents to the built environment.

⁸ Planning permission ref. F/TH/88/0699.

⁹ Planning permission ref. F/TH/97/0180.

¹⁰ Pursuant to planning permission ref. F/TH/14/0158, in respect of which I am told plan no. 15/1543/PL/03 shows the approved internal arrangement (in association with listed building consent ref. L/TH/15/0430).

¹¹ Having variously secured planning permission and listed building consent for different arrangements extending back at least until 1985 (ref. TH/85/0688, TH/87/0805, TH/91/0095 and LB/TH/91/0182).

¹² Noting that internal alterations are not development under section 55(2)(a) of the 1990 Act.

¹³ May 2024, project ref. 9169A, HCUK Group.

¹⁴ Nos. 15 Albert Road, and 12, 14 and 16 Truro Road.

¹⁵ List entry no. 1336317.

¹⁶ List entry no. 1086073.

¹⁷ List entry no. 1281639.

16. Facing the lions are properties at Gateway Court, occupying the square to the south-west of the San Clu. Gateway Court has a northern block by Truro Road and a southern block by Victoria Parade. In its plain and standardised method of construction, with no design cues relevant to its location, Gateway Court is quintessentially mid-to-late twentieth century. The square it occupies was partially occupied by 6 houses fronting as shown on the 1905 Ordnance Survey map reproduced in the HIA. Again, what was historically 6 houses has become accommodation for some 40 households in living memory.
17. Continuing south-westwards, the next square beyond Gateway Court is now occupied by Poldark Court (opposite the Granville Theatre). That appears to be a retirement facility, a block of 41 flats of late twentieth century design. That square appears historically, up until the creation of Poldark Court, to have been essentially open (or to have featured some form of folly and planting). Again heading south-westwards beyond Poldark Court, across Victoria Road is grade II listed Granville House, the former Granville Hotel.¹⁸ Granville House effectively occupies a square in itself bounded by Victoria Road, Victoria Parade, D'Este Road and, again, Truro Road.
18. The list entry for what has become Granville House sets out that 'The Granville development, so named after George Leveson Gower, second Earl Granville (1815-1891), was a venture undertaken by Edward Welby Pugin, together with investors Robert Sankey, George Burgess and John Barnet Hodgson on land acquired from the Mount Albion Estate in 1867. The scheme was to be an important new building in the eastward expansion of the town and the emergence of a fashionable new suburb.' Aptly the list entry describes the building as exemplifying a prestigious seafront hotel of the late 1860s founded on mass tourism of that era and a 'work of great architectural ambition'. That, excess, ambition contributed to the bankruptcy of Edward Pugin, after which the Granville was sold to Edmund Davis (as above, involved in the development of what has become the San Clu).
19. Whilst the south-western half of the historic terrace that has become the San Clu was destroyed by fire in 1928, the western corner of Granville House was damaged by enemy action on 12 November 1940. Internally too, both have evidently changed over time; the former baths and grand hall at Granville House having fallen out of use over time, and that property having been affected by a fire also in 1985. The list entry for Granville House explains how 'In 2002, a development scheme to create a block of new apartments on the west side of [the] site (which involved rebuilding a slightly modified replica of the destroyed wing) was granted consent. This was completed in 2004...'. The appellant alludes to that scheme as offering something of a parallel to what is now proposed at the San Clu.
20. Nevertheless, there are some noteworthy distinctions between the San Clu and Granville House. The former became a hotel after its initial construction; Granville House morphed into a hotel during its establishment. The San Clu forms part of the square in which it sits, whereas Granville House occupies the entirety of the square there. The San Clu, particularly when viewed from the north-east, reflects a classical building hierarchy of substantial facades with a declining scale and level of ornamentation to the rear (to which I will return). That is not the case at Granville House where the historic Victoria Road facade matches the grandeur of its facade initially, features a diverse array of architectural detailing, and culminates in an imposing buttressed and crenelated tower.¹⁹
21. Aesthetically, Granville House is more Puginesque. Along with being grander, it features more ornate and livelier detailing consistent with Gothic Revivalism than the San Clu. It is therefore somewhat surprising both are, equitably, grade II listed. Granville House is also

¹⁸ List entry no. 1203535.

¹⁹ Described in the list entry as 'a vast landmark tower (originally 170ft high, although truncated at a relatively early date)'.

appreciably multiphase, having had various alterations made to it around 1900 (including balconies, a pedimented entrance, and a colonnade along its facade).

Statutory context

22. Notwithstanding the limited extent of works that would affect the historic fabric of the San Clu, I have approached the appeals in the context of sections 16(2), 66(1) and 72(1) of the LBCA. Section 16(2) requires that I have special regard to the desirability of preserving the (listed) building or its setting or any features of special architectural or historic interest which it possesses. Section 66(1) is comparable with section 16(2), albeit that it relates to where planning permission, instead of listed building consent is sought (and is therefore not confined in applicability to works affecting the listed building as in LBCA section 7).
23. The National Planning Policy Framework (published 7 February 2025, the 'NPPF') defines the setting of a heritage asset as the surroundings in which it is experienced. LBCA section 72(1) requires that I pay special attention to the desirability of preserving or enhancing the character or appearance of the (conservation) area. More broadly section 38(6) of the Planning and Compulsory Purchase Act 2004 as amended sets out that planning decisions must be taken in accordance with the development plan unless material considerations indicate otherwise. Here the development plan includes policies of the Thanet Local Plan (adopted 9 July 2020).

Policy context

24. Recognising that heritage assets are an irreplaceable resource, NPPF paragraph 202 sets out how they should be conserved in a manner appropriate to their significance. NPPF paragraph 212 continues that great weight should be given to their conservation relative to their importance.²⁰ More broadly NPPF paragraph 135.c) sets out how development should be sympathetic to local character and history. In summary, amongst other things, and with varying emphases, Local Plan policies SP36, HE02, HE03 and QD02 seek to achieve similar. With the same caveats, Local Plan policy QD03 seeks to avoid unacceptable living conditions resulting from development, with NPPF paragraph 135.f) seeking to ensure that a 'high standard' of amenity is achieved.
25. At its core, planning is a process for reconciling different interests in the use to which land is put. Both the Local Plan and NPPF therefore contain policies which might be summarised as both supportive and restrictive of development. Understandably the appellant points towards elements of the Local Plan and NPPF which are supportive of development. That is particularly, albeit not exclusively, in respect of provisions supportive of improving tourism facilities, providing residential accommodation and making optimal use of land.²¹ I will return to the benefits of the scheme subsequently.
26. The appellant notes that housing delivery in the District achieved only 67% of the requisite Housing Delivery Test requirement over the previous 3 years. The officer report associated with the scheme indicates that the Council was only able to demonstrate a 3.18 year supply of deliverable sites relative to housing needs at that juncture (a significant shortfall, challenging to remedy, relative to the 5 year expectation as in NPPF paragraph 78). The consequence is that NPPF paragraph 11.d) applies in determining the acceptability of the development proposed.
27. I have also had regard to all other relevant material considerations in determining these appeals in addition to the NPPF, including the Conservation Area Appraisal and Historic England's study of Ramsgate as reference above, the Planning Practice Guidance ('PPG'), the Council's Corporate Plan 2024-2028, and the consent order in *Daejan* referred to by

²⁰ With NPPF paragraph 219 emphasising how opportunities should be taken to enhance or better reveal the significance of assets, an aim which is theoretically capable of being achieved through remedying previous insensitive interventions.

²¹ Notably referring in that context to Local Plan policies SP04, E07, E08 and H01, and to NPPF paragraphs 73, 85, 129 and 130.

the appellant (little more than a reminder of PPG advice in respect of clearly articulating the extent of any harm).²²

The dispute between the appellant and council (the ‘main parties’)

28. Planning permission and listed building consent were both refused by the Council based on what they considered to be the adverse effects of the scheme that would result to special interest, significance and the character or appearance of the listed building and the Conservation Area as the case may be (hereafter collectively ‘historic integrity’). That is on the basis that the scheme, in their view, would appear ‘neither as a pastiche continuation of the existing building, nor a sufficiently modern contrast...’; in other words an uncomfortable middle ground between emulating, or distinguishing from, historic integrity. Whilst there is some force in the appellant’s overarching position that a scheme does not have to fall neatly into one of those two camps, it is fair to say that drawing elements from both perspectives often involves treading a fine line.
29. Paragraph 15 of the appellant’s Heritage Appeal Statement sets out that ‘the reason for the harm [as articulated by the Council] is expressly stated as the design, rather than the principle or scale of the extension’. That, however, is overly simplistic. The design of the scheme cannot be put to one side from the scale and nature of the proposal overall; they are intertwined. Moreover, subject to the overarching principle of ensuring fairness, section 79(1) of the 1990 Act enables me to deal with an application as if made to me in the first instance.²³ Additionally, in respect of appeal A, there is a dispute between the main parties in relation to the acceptability of the effects of the scheme to the living conditions of the occupants of nearby properties.

Planning history

30. Each proposal must be determined on its merits. Nevertheless, amidst an extensive planning history, planning permission was granted in 2000 for a five storey extension to the San Clu, which was ‘renewed’ in 2005.²⁴ The previous scheme was not, however, implemented or commenced (and has therefore lapsed). Although I will return to the previous scheme, being referred to by the appellant in support of the current proposal, it evidently does not represent a realistic ‘fallback’ position. I also note that the Council has provided their pre-application response of 30 January 2024 in respect of the current scheme,²⁵ to which the design has sought to respond. Nonetheless, that a scheme has evolved does not indicate that it is acceptable.

Main issues

31. The main issues are the effects of the proposal in respect of historic integrity and, in respect of appeal A, to the living conditions of the occupants of those nearby.

Reasons

The nature of historic integrity hereabouts

32. Presently the San Clu principally comprises the 4 remaining properties of an original terrace of 8 houses.²⁶ As shown on the 1905 Ordnance Survey map referenced above, there was already at that juncture a distinction between different elements of what was built

²² Daejan Properties Ltd v Secretary of State for Housing, Communities and Local Government and the London Borough of Camden (ref. AC-2025-LON-000526), PPG Reference ID: 18a-018-20190723.

²³ Noting that there is a body of evidence before me in respect of the scheme overall extending through pre-application discussions, different iterations of the scheme considered by the Council at application stage, and in respect of the scheme at appeal.

²⁴ Ref. F/TH/00/00825 and RN/TH/05/0643.

²⁵ Ref. PRE/PRE/23/0132.

²⁶ As it stands illustrated on plans B24029_SanClu_01.dwg REVISION: A, SD Ref No23294_02a, SD Ref No23294_03a, SD Ref No23294_01a and SD Ref No23294_04a.

as Granville Terrace. That map shows the 3 south-western properties as the Hotel Saint Cloud (the San Clu being a derivation thereof).²⁷

33. The facade of the listed building is five storeys tall, the fifth storey (fourth floor) set within the roof pitch by virtue of parapet gable dormers. There is a basement level, along with an understated single-storey addition next to the garden.²⁸ Apparently relatively recently, a utilitarian projecting flat-roofed entrance lobby has been added. Whilst the lobby somewhat disrupts the otherwise symmetrical facade of the listed building, the Hotel's origin as a terrace remains readily appreciable by virtue of 4 projecting canted bay windows finished in stucco emulating stone (with symmetry of design above). As is typical of properties of this era, there is a low front boundary wall of rendered brick or bungaroosh.²⁹
34. There are seawards-facing balconies at first and second floors. Those appear to run continuously and symmetrically across the facade, jutting out slightly in line with the projection of the north-easternmost bookend to the listed building. Balcony detailing is curious, having something approaching an art-deco aesthetic (being rigidly geometric and symmetrical with limited ornamentation and extensive glazing with fine frames and bars). The facade of the third and fourth floors are instead principally of Flemish-bond stock brickwork with stone courses. At third floor, sashes are set within relatively modest stucco surrounds. Fourth floor detailing is more intricate; pairs of sashes are set within pilasters spanned principally by round arches, above which are oculus windows. There is moulding tracking parapets, each dormer being topped with a decorative finial.
35. By consequence, the architecture of the listed building does not fit neatly into a single category. In all likelihood that accounts for the equivocal attribution of the listed building to the designs of Pugin in the list entry. It appears perhaps Regency or early Victorian with dilute Gothic influences. That contrasts with nos. 3-13 Albert Road, which are more clearly Gothic Revival (so too is Granville House, albeit now somewhat multiphase on account of a succession of alterations).
36. The north-eastern elevation of the San Clu, facing Thanet Road as it rises gently from Victoria Parade towards Truro Road and beyond, remains essentially intact.³⁰ Initially that elevation mirrors the facade of the listed building in scale and design. After two bays and another historic entrance, however, there is a clear step down in height and scale. Thereafter there is an element of the property, forming part of a rear outrigger (the parapet of which is approximately level with the header of third floor facade windows). Windows there are more modest and there is less ornamentation.
37. Notwithstanding some alteration at lower level to the rear of the San Clu for functional purposes in connection with the use of the property as an hotel, 2 pairs of historic and again broadly symmetrical outriggers remain. Whilst those are also of five storeys, they are more modest in scale than the facade. Outriggers also lack the detailing present at the facade, being principally of plain brickwork peppered with sash windows.³¹
38. That elevational hierarchy is one typical of construction of this era, particularly around squares; facades effectively giving way to more modest, less formal, and functional elements of properties to the rear. Figure 5 of the 1900-1905 Nigel Temple Collection

²⁷ It is unclear if that name was purely a whim, or if there is any particular association with that area of France (Edward Pugin having been inspired by French Gothic architecture).

²⁸ Whilst there is some logic in the appellant's position that the single storey side extension detracts from the Conservation Area, that is only to a very limited extent. It is modest, plain and functional. It is also set at a lower level than the garden, and partially occluded by the boundary wall of the plot and planting at the garden in any event.

²⁹ In all likelihood which would have historically been finished with railings similar to those guarding the lightwells at nos. 3-13 Albert Road (notwithstanding that the stepped wall around the garden itself appears potentially a later addition).

³⁰ As shown on plan no. SD Ref No23294_02a, 'Existing Elevations'.

³¹ That relationship of scale and design, and the subservience of outriggers, is shown clearly on plan no. SD Ref No23294_03a.

postcard reproduced in the HIA, albeit of low resolution, shows that historically there was a comparable treatment to the south-west of the San Clu facing Albert Road.

39. As above, as a consequence of early twentieth century fire damage, the listed building has been visibly truncated to the south-west (where formerly internal chimney breasts are visible). It appears that demolition was undertaken rather crudely at the time. The facade stops abruptly and irregularly, much like a jagged saw cut. Whilst it is a truism that significance may not be embodied solely in the original form of a building, it appears that the south-western element of the terrace was simply removed and made good haphazardly (rather than sensitively relative to the ordered nature of what would have been).
40. I was able to discern nothing internally that authentically embodies the history to the San Clu, having accessed much of the ground floors, corridors, and basement during my site visit. Although the underlying fabric of the building is historic, the absence of any clear historic detailing or craftsmanship appreciable internally likely results from successive layers of remodelling over time. For comprehensiveness, there is no indication that anything related to the San Clu as it stands was done in the hope of making consent or permission easier to gain, as opposed to simply representing an accretion of incremental changes over time.
41. Therefore, insofar as relevant to these appeals, the special interest and significance of the San Clu derives principally from its architecture- notably its scale, hierarchy, materials and detailing- along with its relationship to its surroundings (and, to a lesser degree, its historic associations). To some extent its current form honestly reflects the passage of time and changing circumstances since the establishment of Granville Terrace.
42. Notwithstanding *Daejan* as above, it would be artificial to forensically separate the significance of the San Clu from the wider historic environment of which it is part. As with Granville House, the history of the San Clu is emblematic of the latter stages of the establishment of Ramsgate as a Georgian society resort founded principally on coteremporary fashion. Again, insofar as relevant to these appeals, the character and appearance of the Conservation Area is reflected in its diverse architecture, craftsmanship, conscious arrangement and design, and the intangible forces and associations those features authentically reflect in physical form. The same might be said to be true of nos. 3-13 Albert Road in terms of special interest and significance and heraldic lions, whose nature and history is addressed above.

The proposal

43. As clarified by the main parties at appeal, the list of plans appended to these decisions is correct and comprehensive. The proposed internal arrangement is shown on plans nos. 419-100 REV: F, 419-101 REV: C, 419-102 REV: E and 419-105 REV: A. An additional 3 plans are advanced which were not before the Council during their determination of the scheme, which have the effect of omitting a balcony formerly proposed.³² That reflects a very minor alteration to the scheme, to which the Council rationally have no objection to my considering.
44. In terms of uses, paragraph 4.2 of the appellant's statement of case sets out that the proposal 'would facilitate the provision of 19 self-contained flats, 10 would be sold on the open market whilst 9 would be retained as holiday accommodation (served apart-hotels)'.³³ It is also said that the scheme would provide for conference facilities, a coffee shop and a reception area at ground floor. The basement to the property would be made use of, to accommodate a 'gym, spa, sauna and changing rooms'. The scheme also entails the

³² Plans no. 419-102 REV: E, 419-104 REV: F, and 419-103 REV: F.

³³ Further explained at paragraph 6.24, in that 'it is proposed that this development would accommodate 12no. 2 bed and 7no. 1 bed flats...'

reconfiguration of the plot to provide for parking spaces, bicycle and refuse storage and a communal garden or terrace.

45. The proposed elevations are shown on plan no. 419-103 REV: F and 419-104 REV: F. In short, the new wing proposed would be the same overall height and width as the existing hotel (subsuming the footprint of the existing single storey extension). A central glazed link is intended to bridge between historic elements of the listed building as it stands, and elements of the proposed new wing to be built in an historic aesthetic. The lobby is to be removed and railings along the boundary wall reinstated.³⁴
46. Certain details of materials and junctions are given on plan no. 419-201 and the location of swift bricks given on a plan also of that reference (no. 419-201). A preliminary drainage plan is at plan no. 39547/C/500 P1. There has evidently been a process of reducing balconies and terraces in the design of the scheme; superseded plan no. 419-103 REV: E itself carrying the notation relative to an earlier iteration 'top floor terrace removed'.
47. There is some discussion in the evidence before me regarding the use of aluminium or timber windows in terms of achieving both the structural performance and finesse of historic windows, and as to the potential for limiting residential paraphernalia at balconies via condition. The appellant's Design and Access Statement,³⁵ additionally refers to the intended use of matching brickwork and render. Inevitably the proposal will entail some tying in, making good, and cosmetic finishes. Although planning may only legitimately go so far in governing residential paraphernalia, theoretically such matters would be controllable to some extent via condition (were the scheme acceptable overall).

The effect of the proposal

48. There is evidently a case to be made for development of a site relatively central to Ramsgate once occupied by dwellings, in an area which has experienced significant intensification of development over time.³⁶ As above, the Council previously found some form of development here to be acceptable in 2000 and 2005, and also at Granville House. It is somewhat ironic that vocal objection to the scheme comes from those who are themselves present here by virtue of intensification over time. It is also only by quirk of fate that the garden at the San Clu exists.³⁷
49. Contemporary design and historic integrity are not inherently inimical, and I acknowledge that the appellant has attempted to tread the line in respect of differentiating from, and integrating with, the listed building as it stands. The facade proposed would mark a distinct break from history, whilst referencing the scale, and in certain respects, detailing of the San Clu at present. There have been a succession of revisions to the scheme attempting to arrive at an appropriate arrangement. Physically, subject to appropriate safeguards via conditions, the scheme would be capable of integrating suitably with the existing fabric of the hotel. Nonetheless, for 5 principal reasons, I do not share the appellant's view that no harm would result in respect of historic integrity.
50. Firstly, although similar devices have been used elsewhere to mark a break between past and present, the proposed glazed link would appear, frankly, clumsy. Visually, the jagged saw cut to the existing building would remain (and be accentuated). That would result in an

³⁴ Alterations to the existing building are shown on plan no. 419-110 REV: B.

³⁵ GPM2 Design, March 2024.

³⁶ NPPF paragraph 124 sets out how policies and decisions should 'promote an effective use of land...', with paragraph 125.c) setting out how 'substantial weight' should be given to 'the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused...'. Importantly, however, the latter paragraph is caveated with such land being 'suitable' in the first instance (which may turn on various factors). As such, and setting aside that above ground development was only present here for some 45 to 55 years, whether or not the site may accurately be described as previously developed is incidental.

³⁷ Setting aside how, if at all, that factored into decision-taking regarding the acceptability of nearby uses, including at nos. 3-13 Albert Road.

asymmetry of glazing, having noted above how that element of the property appears a haphazard rather than meaningful legacy of the 1928 fire (and that symmetry is a clear feature of the listed building). It seems partially as a result of the proposed glazed link that at ground floor there would be 5 new windows or doors of varying proportions, diverging from the more consistent rhythm of the San Clu as it stands.

51. Secondly, beyond the glazed link, the facade would come close to a mirror-image of part of the listed building as it stands.³⁸ That would invite curiosity as to what occurred here, or what the form of the proposed building conveys in terms of historic significance. It might lead, confusingly, to the conclusion that what once existed were two terraces. Alternatively it might inaccurately signify that only one of the original 8 houses had been demolished. The glazed link would therefore not only appear awkward or discordant visually, but interfere with an appreciation of the history of the building.
52. Thirdly, the articulation of the historic element of the proposed new wing is curious. Whereas at third and fourth floor the proposal would be near-identical to that which exists, the glazing arrangement of balconies would differ, and would again be asymmetric. Ground floor windows and doors would also be of varying sizes and proportions, indicating that their design has been led principally by the uses to which the rooms they serve would be put. Given that existing balconies and bays are distinctive features of the existing building, that would entail further questions as to whether a building formerly existed here of different design.
53. Fourth, it is instructive to compare plan no. 419-103 REV: F with plan no. SD Ref No23294_02a, respectively showing the proposed south-western and existing north-eastern elevations. The two are markedly different. As above, and as is typical of historic construction of this era, towards the rear of the property scale and detail reduce. That has not been reflected clearly in the proposal, where the scheme would appear to continue the grandeur of the facade further along Albert Road than it continues along Thanet Road.
54. In respect of the proposed Albert Road elevation, the ridgeline would be markedly higher than the existing outriggers. The proposed outriggers themselves would diverge from the scale, proportions and form of those elements of the listed building which exist. As shown on plan no. 419-104 REV: F, both would be of greater bulk than existing outriggers, increasing in size towards Albert Road. That would, in my view, not only further disrupt the existing symmetry of the listed building, but also lead to an awkward relationship with no. 3 Albert Road which would not have been the case historically.³⁹
55. It is therefore a false premise to consider the scheme as hidebound to replicating what has been lost; the proposal evidently does not seek to do so. Instead it appears very much that the form of the building has followed function, in that it has been guided principally by the aim of accommodating a certain quantum of development (rather than responding sensitively to the nature of the site). Considered as a whole, the scheme would result in a building which is convoluted in design and challenging to understand.
56. Although the previous scheme here does not represent a realistic fallback position, it is worth considering, along with alterations to Granville House. The elevations and ground floor plan of the previously approved scheme in respect of the San Clu are shown on plan no. 522 AL (03) 11 B and 522 AL (03) 01 A. The previous scheme did not propose a glazed link or retaining the rough-sawn edge to the existing building (the distinction between what stands and what was proposed being articulated, in my view, more subtly).

³⁸ Exempting the treatment of balconies and ground floor windows and doors.

³⁹ I will address living conditions, being thematically different to heritage matters, subsequently.

57. Similarly, previously 3 new bays and an entrance were proposed, better echoing something of the arrangement of the 4 former properties that would have existed here. Moreover previously, there would have been a clearer decline in scale and hierarchy to the proposed extension moving north-westwards along Albert Road. It is curious why the Heritage Rebuttal explains how 'this [lost] part of the building is clearly evidenced in photographs included within the HIA, allowing new designs to pay attention to the roof profile, massing, scale and detailed design',⁴⁰ yet the scheme fails to do so.
58. As reflected in paragraphs 20 and 21 of these decisions, similarities between the San Clu and Granville House go only so far (the latter having always been a somewhat more eccentric building and having become mutable historically). The list entry refers to remodelling of the building in 1947 following war damage; the 'western corner' being affected by enemy action being very different in tone to half the terrace having been demolished at the San Clu.
59. Based on my site visit observations, it appears that additions at Granville House completed in 2004 are neatly in the neoclassical camp, such that there is not so clear a dissonance as would result between old and new were the scheme before me to be effected.⁴¹ Therefore fifth, if anything, the existence of the previous permission at the San Clu and development at Granville House count against the scheme.

Consideration

60. Paragraph 20 of the appellant's Heritage Appeal Statement sets out how the proposal aims to marry 'old and new in a way that clearly demonstrates the evolution of the building while remaining in keeping with the principles of the terrace in terms of roof shape, form and design and the elevations treatments of the rest of the terrace'. I disagree. Instead the proposal would, in my view, jar with the listed building and detract from its significance. In doing so it would also fail to integrate appropriately with the character or appearance of the Conservation Area (or with the setting of nos. 3-13 Albert Road).
61. It is for the decision-taker, having established that harm would result, to gauge its magnitude.⁴² Given that the significance of the San Clu would not be vitiated altogether or very much reduced, it is fair to describe the harm that would to it as less than substantial within the phraseology of NPPF paragraph 212. As in paragraphs 22, 48 and 49 of these decisions there are certain mitigating factors, such that the harm arising might fairly be pegged as around the middle of a spectrum within that categorisation.
62. Notwithstanding the dispute between the main parties as noted in paragraph 29 of these decisions, the proposal would adversely affect the setting of nos. 3-13 Albert Road, logically to more limited degree than in relation to the San Clu (given the extent of their setting). There would also be harm to the character and appearance of the Conservation Area, albeit logically more limited still (given the broad extent of that area and its somewhat diverse nature). On account of the relationship of the site and proposal to the setting of other listed buildings, including the heraldic lions, there would otherwise be no effects amounting to heritage harm that would result.
63. NPPF paragraph 215 sets out that any less than substantial harm should be weighed against the public benefits of the proposal. Whilst there is no prescribed way in which heritage harms and benefits need necessarily be weighed one against the other, I will subsequently turn both to what have been advanced as 'heritage' benefits of the scheme and broader public benefits. That 'external balance' approach has the benefit of ensuring

⁴⁰ HCUK letter of 14 January 2024, ref. 9169C.

⁴¹ Setting aside that there is nothing before me to gauge the extent of intensification there as is proposed here (notwithstanding the onus being principally on an applicant to substantiate their case under section 62(3) of the 1990 Act).

⁴² Paragraph 30 of the appellant's Heritage Appeal Statement appearing to alight on the potential of their being 'some harm' a rational conclusion for me to reach.

all benefits of the scheme are addressed once and comprehensively. I note, however, at this stage that NPPF paragraph 213 sets out that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction or from development within its setting) should require 'clear and convincing justification'.

Living conditions

64. Determining the implications of a scheme in respect of living conditions is inherently a matter of judgement. Existing living conditions, effectively the baseline nature of an area, are reasonable to consider in that context. Living conditions are furthermore, to some extent, reliant on personal perspective: some may unthinkingly accept living conditions that others would not (and people, more-or-less, make a choice as to where to live).
65. Evidentially, the scheme is supported by a Daylight and Sunlight Assessment ('DSA').⁴³ The DSA models the effect of the proposal in relation to nos. 3 and 5 Albert Road in line with industry standard guidance, the Building Research Establishment's 'BR 209:2022',⁴⁴ in respect of sunlight and daylight (collectively in these decisions 'natural light').
66. Paragraph 6.6 of the appellant's statement of case partially summaries the conclusions of the DSA, in that 'the daylight test demonstrated that out of the 19 windows tested, 14 passed the test and in line with the BRE criteria can conclude that the impact will be negligible'. Notwithstanding that BR 209:2022 reflects technical guidance as opposed to setting tests as to the acceptability of a proposal, the conclusion of the DSA notes that in 'the cases where the reduction exceeds the BRE thresholds for both daylight and sunlight, it has been concluded that in the majority of cases these windows and rooms serve bedrooms which have the lowest expectation for daylight or are partially also obscured by the surrounding built environment itself'.
67. In greater detail DSA table 5.1 sets out how 2 windows at no. 3 Albert Road would experience what is termed a 'minor adverse' impact in terms of vertical sky component analysis - W1 (ground floor) and W5 (lower ground floor)- whereas 3 windows at no. 3 Albert Road would experience a 'major adverse' impact in that respect - W3 (ground floor) W7 (lower ground floor) and W8 (lower ground floor). Figure 3 of the appellant's statement of case reproduces the internal plan of the basement flat at no. 3 referenced in footnote 10 of these decisions, with annotated window references.
68. Notwithstanding some concern from the occupants of flat 4 at no 5 Albert Road in particular as to the function of the space served by a given window, DSA Appendix A.3 sets out the underlying tabulated results for daylight and sunlight calculations (presented by window and by room). In respect of the ground floor flat at no. 3, 'Room 4' served by lower ground floor windows W7 and W8 would experience the most significant reduction in availability of natural light.⁴⁵ It is, however, uncontroversial that internal spaces occupied intermittently, such as bedrooms, generally need less natural light than other rooms typically used more continuously.
69. Adding to the conclusions of the DSA, paragraph 6.9 of the appellant's statement states that at no. 3 Albert Road, adversely affected windows are already partially obscured in terms of the availability of natural light, 'the flat is not permanently occupied and used as a holiday let', and 'the building is currently for sale (as of July 2025), potential buyers will be aware of the planning history'.
70. I agree with the appellant that, in summary, there is already qualified availability of natural light in respect of windows at nos. 3 and 5 as a result of boundary features enclosing those

⁴³ Herrington Consulting, March 2024.

⁴⁴ Entitled 'Site layout planning for daylight and sunlight: a guide to good practice' (BR 209, 2022 edition).

⁴⁵ From an existing lit area of 83.90% to 17.25%.

plots and shading that will inevitably occur from time-to-time on account of the existing form of those properties. Several windows, including W7 and W8 serving the ground floor flat at no. 3 lead to a small courtyard, sunken relative to the garden at that property and the boundary wall of the plot (next to which is the garden at the San Clu). In favour of the appellant's position, it should also be mentioned that between around 1873 (or 1883) and 1928 the San Clu was a terrace of 8 properties, and that permission was granted by the Council for development here in 2000 that would have inevitably entailed effects in terms of the availability of natural light nearby.

71. Paragraph 6.12 of the appellant's appeal statement further quotes from the conclusion of the DSA in that 'the assessment of the sunlight available to the neighbouring amenity areas indicates that during the summer months when the amenity areas are most likely to be in use, the main amenity spaces will still receive a good level of direct sunlight with the proposed development in place.'
72. Whilst that may be the case, as in respect of the internal availability of natural light, there is nevertheless demonstrably some degree of adverse effect. Even at a hypothetical point in time of 21 June were the scheme to be effected, DSA Appendix A.3 indicates that only 95% of the external area at the ground floor at no. 3 would be lit (compared to 100% previously). More significantly, within those parameters the courtyard area to the basement flat would, it appears, benefit from no natural light. There would be a more significant reduction in the availability of natural light at external areas at a hypothetical point of 21 March. Within those parameters the lit external area at the ground floor of no. 3 would appear to change from 100% to 0%, and at the ground floor of no. 5, from 42% to 0%.
73. Setting aside what might be termed a DSA rebuttal,⁴⁶ even on the appellant's evidence there would be a reduction in the availability of natural light within the plots of nos. 3 and 5 at certain times of year (and in respect of certain rooms). In respect of the basement flat at no. 3 that would be significant, a flat I note which was authorised after the 2000 permission was renewed in 2005. There is nothing indicating that the basement flat at no. 3 is subject to a restriction in respect of holiday accommodation use, and that a property is up for sale does not displace the need for acceptable living conditions.
74. In respect of natural light alone, however, given the nature of the area and degree of effect, the scheme might not necessarily be unacceptable with reference to Local Plan policy QD03.⁴⁷ Nonetheless, not only is natural light at issue. The Council's decision notice in respect of application ref. F/TH/24/0678 also refers to implications in respect of a sense of enclosure (there being no mention of privacy).⁴⁸
75. To some extent a corollary of my reasoning in respect of historic integrity, as a result of the scheme the plots of nos. 3 and 5 Albert Road would effectively be hemmed in by development. I have set out in paragraph 55 above that it would be a falsehood to see the scheme as one bound to replicate what was lost, and at paragraphs 54 and 57 that the south-western elevation and rear outriggers proposed are more substantial than that which would have existed historically. Moreover, the proposed outrigger closest to the plot of no. 3 is far larger than those which exist, and would result in a blank elevation facing the plot of no. 3 reaching almost as high as the highest ridgeline of the San Clu.

⁴⁶ Prepared by Right of Light Consulting representing certain owners of nos. 3 and 15 Albert Road, 15 South Gateway Court, 75 Thanet Road and 12 Truro Road. That contends, in short, that a wider net should have been cast in terms of assessing effects (notwithstanding the distance of some of those properties from the appeal site).

⁴⁷ Noting that NPPF paragraph 130.c) speaks of taking a flexible approach in applying policies or guidance relating to daylight or sunlight 'where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)'.

⁴⁸ Notwithstanding that the Council's officer report associated with the scheme identifies concerns in respect of the privacy, or a perception of overlooking, of the occupants of no. 3 Albert Road.

76. I was unable to identify a comparable interaction as the foregoing in the surrounding area. As noted above, the Granville House redevelopment does not offer support in that regard given the relationship of that listed building to its surroundings. Moreover, plan no. 419-100 REV: F shows that the communal terrace, very limited in extent relative to the existing garden, would be between and beside the proposed outrigger nearest no. 3 Albert Road and the boundary of the plot.⁴⁹ Setting aside that the communal terrace itself is likely to benefit from limited natural light, and practically its enjoyment would also be qualified by virtue of it being set next to refuse provision, its use in connection with a greater intensity of development would likely further qualify living conditions at nos. 3 and 5 (by virtue of inevitable comings and goings, conversations and other noise associated with its use for functional purposes).
77. Drawing together my reasoning under this main issue, cumulatively by virtue of the implications of the scheme in terms of the availability of natural light along with an increased and atypical visual and perceptive sense of enclosure, the scheme would meaningfully adversely affect the living conditions of the occupants of nos. 3, and, albeit to a lesser extent, of the occupants of no. 5 Albert Road. The scheme would therefore conflict with the relevant provisions of Local Plan policy QD03, and of NPPF paragraph 135.f). I note that it appears that the DSA did not inform the scheme design (but rather assessed the consequences of seeking to accommodate a certain quantum of development here).

The balance

78. As above, the scheme would entail what might be described as various heritage benefits, notably the demolition of the single storey addition to the San Clu, its lobby, and the reinstatement of railings in an historic aesthetic. More broadly a greater intensity of use, and therefore in all likelihood turnover, would generate a greater ability to maintain the asset in the long-term (the restoration and maintenance of windows being cited by the appellant in that context).
79. That said the heritage benefits of the scheme cannot be said to carry more than limited weight. As also reasoned above, the single storey addition is relatively unobtrusive and the lobby affects little an appreciation of the history of the building. There is nothing indicating that the state of the San Clu or its plot is presently unauthorised, and there is also nothing to indicate that the hotel is currently struggling financially.
80. Whilst weight might be accorded to the improvement, modernisation or expansion of the various facilities referred to at paragraph 44 of these decisions, there is some existing provision in that respect (such that, similarly, any positive weight in that respect cannot rationally be more than limited).⁵⁰ There is no indication that the rearrangement of the plot, or the various obligations towards infrastructure in the unilateral undertaking of 18 March 2025 under section 106 of the 1990 Act (the 'S106'), would do more than offset the implications of the additional intensity of development proposed.
81. There would evidently be more significant social, economic and environmental benefits. It is the appellant's intention to sell 10 flats, the provision of housing being a clear benefit, particularly in the light of local challenges in terms of delivery and forecast delivery.⁵¹ The provision of 9 self-contained holiday units responds to what might be termed as something of a gap in the market.⁵²

⁴⁹ Little more than a residual area of land resulting from accommodating the footprint of the proposal within the geometry of the site.

⁵⁰ The Design and Access Statement referenced above, for example, setting out that there is a gym and spa at present.

⁵¹ The appellant noting that flats would be served by a lift and therefore accessible by those with limited mobility, responding to demographic trends and needs in that regard.

⁵² With reference to Local Plan paragraph 9.2 and priority 4 of the Council's Corporate Plan, noting in particular, the observations of the Council's Tourism and Culture Manager of 16 October 2025. The latter sets out how 'from a visitor economy perspective, Thanet District Council Tourism Service supports the expansion of tourism facilities such as this, with aparthotel, gym and spa facilities, and function facilities, all of which are needed in the town and district'.

82. There would also be clear economic benefits during construction, operation, and through new occupants bringing trade to local facilities (in the context of what evidence presented at appeal indicates is a relatively less buoyant economic area). Setting aside the intention to offset potential negative implications to swifts on-site, to mitigation off-site in respect of the ecological integrity of the Thanet Coast and Sandwich Bay Special Area of Conservation, there is also the intention to secure requisite biodiversity net gain credits (a significant positive environmental outcome that would not otherwise occur).
83. There is a risk, however, that weighing and balancing negative and positive benefits suggests that planning is reduceable to some form of equation. Implications may exist in different equations, let alone words connoting weights (and themselves being liable to differing interpretation). Any scheme, however harmful, might be capable of delivering similar social, economic and environmental benefits as above.
84. Importantly, there is fundamentally nothing in the evidence before me to justify that achieving the benefits that would result are intrinsically reliant on allowing the scheme before me (or that the scheme derives from a clear process of considering the site constraints and context). Moreover in this instance the existence of planning permission here previously, and redevelopment at Granville House, count against allowing the appeals. In that context- even setting aside implications for living conditions, and even if the scheme were acceptable in all other respects- the public benefits do not provide clear and convincing justification relative to the heritage harm that would result.
85. Inherent in that reasoning is that the scheme conflicts with the clear expectations of statute and both the relevant provisions of Local Plan policies and NPPF paragraphs cited in paragraph 24 of these decisions. The consequence, with reference to NPPF paragraph 11.d)i., is that the application of NPPF heritage policies provides a strong reason for refusing the development proposed. No other material considerations are sufficient to justify allowing the scheme.

Conclusion

86. For the reasons above, having taken account of the development plan as a whole as necessary along with all other relevant material considerations, I conclude that the appeals should be dismissed.

Tom Bristow

INSPECTOR

Appendix of plans

419-001	Proposed Site Plan
419-100 REV: F	Proposed Ground Floor Plan
419-101 REV: C	Proposed Upper Floor Plans
419-102 REV: E	Proposed Fourth Floor and Roof Plan
419-103 REV: F	Proposed Elevations
419-104 REV: F	Proposed Rear Elevations and Sections
419-105 REV: A	Proposed Basement Plan
419-110 REV: B	Proposed Alterations to Existing Building
419-201	Proposed External Details/ Proposed Swift Brick Locations
39547/C/500 P1	Drainage Layout
Ground Floor Plan (Existing)	B24029_SanClu_01.dwg REVISION: A
Existing Elevations (NE)	SD Ref No23294_02a
Existing Elevations (NW)	SD Ref No23294_03a
Existing Elevations (SE)	SD Ref No23294_01a
Existing Elevations (SW)	SD Ref No23294_04a