



Roger Joyce Associates
CHARTERED ARCHITECTS

Planning

and

Heritage Statement

in respect of an application

for conversion of three rooms into

self-contained two-bedroom, three -person flat

(Flat'B')

at

9, Trinity Crescent CT20 2ES



For Folkestone Prime Ltd

April 2025

Ref 23/211

Introduction

This Statement is intended to support a submission of a planning application to convert three rooms in an existing HMO into a self-contained, 2 bed, 3-person Flat 'B'

Purpose of the statement

The statement sets out to satisfy the requirements for a Heritage Statement, as the site is in the Leas and Bayle Conservation Area

Policy

Much of existing Policy is aimed at new build, but where it may apply to conversion such as this proposal, we believe that this conversion is desirable, in that the current use of the building is as an HMO, As such, living conditions are less desirable than the proposal – the proposal seeks to satisfy HB1 (4) in particular, in that occupiers will enjoy more generous self-contained accommodation than is currently provided.

Policy HB3 deals with internal and external space standards. The space created complies with that standard.

Policy T5

Cycle Parking Planning permission will be granted for residential development subject to the provision of cycle parking at the following quanta:

Individual residential developments

1 space per bedroom

This amended proposal shows cycle racks in an enclosed secure position in the store at the front of the flat

We believe that the proposal complies with the NPPF paras 96,108 and 114

96.

Planning policies and decisions should aim to achieve healthy, inclusive and safe places and beautiful buildings which:

*a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian **and cycle** connections within and between neighbourhoods, and active street frontages;*

*b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of beautiful, well-designed, clear and legible pedestrian **and cycle routes**, and high quality public space, which encourage the active and continual use of public areas; and*

*c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking **and cycling***

108.

Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) the potential impacts of development on transport networks can be addressed;*
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- c) opportunities to promote walking, **cycling** and public transport use are identified and pursued;*
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places*

and

114.

In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users;*
- c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code⁴⁸; and*
- d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*

Much of the NPPF advice could be seen to be directed at new large scale developments in their early stages of design.....

Other Policy Context

The NPPF Paras 10 and 11 state that decision making should apply a presumption in favour of sustainable development.

Para 38. States that:

Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible

Heritage Statement

Purpose of the Statement

The statement sets out the impact of the proposals on the Heritage asset – in this case the Bayle and Leas Conservation Area

Policy Context

The NPPF sets out the tests for ‘harm’ and the impact of a proposal on the HA (the CA), and describes the information that should be submitted in a heritage statement:

Para 200 describes the level of detail being proportionate to the HA’s importance

Para 201 says that LPAs should take in to account the importance of the HA when assessing the impact of any proposal

Para 212 says that any proposal should make a positive contribution to the setting of the HA

Impact and Conclusion

In this case, as the works are entirely internal, there would be no impact on the setting of the non-designated HA on the CA

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