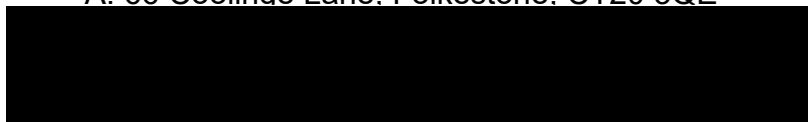




RJB PLANNING CONSULTANCY

Planning Statement

RJB Planning Consultancy Ltd
A: 66 Coolinge Lane, Folkestone, CT20 3QE



In support of an application for
Conversion of church and church hall to a dwelling including associated external alterations

in connection with

**Former South Kent Christian Community Church, 32 Cheriton Road,
Folkestone, CT20 1BZ**

On behalf of

Mr G Chirayus

ISSUE DATE / REVISION	COPY REVIEWED BY	DATE COPY HAS BEEN REVIEWED
07/08/2025 v.3	RJB	07/08/2025

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1. Introduction

- 1.1. This Statement is made in support of the application at the former South Kent Christian Community Church at 32 Cheriton Road in Folkestone. The application seeks planning permission with respect to the development, namely the conversion of the former church and church hall to a single dwelling including associated external alterations.

2. Site Context

- 2.1. The application site is located in close proximity to Town centre and is within the settlement boundary for Folkestone. The site fronts onto Cheriton Road and when last in use was a church and hall associated with worship and associated community uses, it has been redundant for a number of years with marketing information corroborating it being available on the open market for a continuation of the existing lawful use.
- 2.2. The plot itself is a triangular with the main entrance through a porch to the front of the building with a small hard landscaped area and low brick wall and piers with metal railings.
- 2.3. The wider area is largely characterised by residential dwellings which exist to the north, east and west. Rear gardens of the properties along Victoria Grove exist to the rear of the site.

3. Relevant Planning History

- 3.1 The site has been subject to several planning applications set out in Table 1 below.
- 3.2 The site history is extensive, as detailed above, the previous schemes have sought to deliver a greater quantum of development than is now proposed. The key concerns raised under the above application relate to the following:
 - Loss of the community facility
 - Quantum of development and visual impact
 - Amenity for future occupiers due to lack of amenity internally and externally
 - Lack of provision for parking, cycle and bin storage

Planning Reference	Planning Description	Decision	Decision Date
18/1401/FH	Change of use from church (class D1) to 3no. self contained flats (class C3).	Refused	15/11/2019
21/1770/FH	Change of use of existing church hall to two self contained dwellings	Refused	30/08/2023
25/0105/FH	Change of use of church and church hall into a two bedroom house on two levels and a one bedroom house on one level.	Refused	24/03/2025
25/0506/FH	Conversion of church and church hall to a two bedroom house and attached one bedroom house	Refused	11/06/2025

Table 1: Relevant planning history

3.3 The proposal has taken on board the concerns of the Council previously, acknowledging some of the concerns outlined above, have been addressed through the successive applications for the site. These include the following:

- Loss of the community facility
- Quantum of development and visual impact
- Lack of provision for parking and cycle storage.

3.4 Therefore, whilst this proposal is a materially different scheme, some of the conclusions reached by the Council, the history outlined above, which have sought to deliver a greater quantum of development than is now proposed, are conclusions which should be afforded weight in the decision making process for this application. The principle of development, loss of the community facility, quantum of development, visual impact and parking and cycle provision have all been accepted. The less intensive scheme now proposed seeks to demonstrate compliance with the relevant policies and other material considerations in the statement which follows below under the relevant headings.

4. Planning Policy

4.1 In accordance with section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004, the development hereby sought should be made in accordance with the development plan policies unless there are material considerations that indicate otherwise.

4.2 The relevant policies in the Development Plan are as follows:

Places and Policies Local Plan (2020)

HB1
HB3
HB8
C2
T2
T5

Core Strategy Review (2022)

SS1
SS3

5. Principle

- 5.1. The site is located within the settlement boundary for Folkestone, within very close proximity to all the needs for future occupiers and access to public transport options including buses and trains, all within walking distance or possible to access via cycle to prevent a reliance on a car.
- 5.2. It is acknowledged earlier in this statement that the marketing information provided under previous applications (since 21/1770/FH) have established that the loss of the community facility in accordance with development plan policies SS3 and C2, and the guidance in the NPPF under paragraph 93. The conclusions of the Council under the most recent application are not reproduced here but concluded, in summary that there is no longer demand for the facility having been marketed for the requisite time period, the interest that did exist for the property was for residential conversion.
- 5.3. In light of the above, the site sustainable, the loss of the community facility is accepted and therefore, there is no in principle objection to the redevelopment to residential subject to other material considerations.

6. Visual Impact

- 6.1. The proposed development seeks to make minor changes to fenestration as set out on the submitted plans. These are deemed necessary and modest in nature to retain the character and appearance of the former church and hall and its detailing.
- 6.2. The existing dwarf brick wall, piers and metal railings will be retained and soft landscaping is envisaged to provide a softening and make a positive contribution to the street scene which it is understood to be part of the 'Brighter Future' scheme for the Town Centre.

- 6.3. Bin storage is proposed in the existing lean to area with cycle storage. It should be acknowledged, had a community or commercial use been secured when the site was marketed, larger commercial bin storage would have been required which would have prominent and harmful than what is proposed for a single dwelling and likely to be located outside the building within the area to the front of the property.
- 6.4. Should the Council consider it reasonable and necessary, finer details of glazing, joinery and landscaping, this can be secured by condition.
- 6.5. In light of the above, and the previous conclusions of the Council, there is not considered to be any visual harm

7. Residential Amenity

- 7.1. The proposal is for one dwelling, rather than the two previously proposed, which results in a gross internal floor area which far exceeds the requirements of the National Space Standards (see Table 2 below). The accompanying plans demonstrate the head height above the requisite ceiling heights for the first floor mezzanine space would provide for 13.9m² above those specified below.

Standard Required	Proposal	Met?
2b 4p 2 storey dwelling - 79 m ² GIA	142.3m ²	Yes - exceeds
At least one bedrooms with two or more bedspaces is 11.5m ²	11.7m ²	Yes – exceeds
Double is at least 2.75m in width	3.0m	Yes - exceeds
Any headroom of less than 1.5m is not counted	Accounted for under the GIA above	
Any other area used solely for storage and has headroom of 900-1500mm (such as under eaves) is counted at 50% of its floor area, and any area lower than 900m is not counted at all	Accounted for under the GIA above	
Built in wardrobes count towards GIA but should not reduce the effective width of the room below the minimum widths set out above	Not applicable	
2.0m ² built in storage	2.1m ²	Yes – exceeds

Table 2: Space Standards compliance

- 7.2. All habitable rooms would benefit from natural light with the insertion of a large rear window at first floor level to the rear which would be obscure glazed and limited opening up to 2.0m from the finished floor level internally, to ensure light is afforded to this space but without any harmful overlooking and resultant loss of privacy to the dwellings on Victoria Grove to the rear. This conclusion is largely in line with that of the Council in the most recent application where it was confirmed that adequate natural light would be available to safeguard the amenity of future occupiers.
- 7.3. The external amenity space, it is acknowledged in the previous decisions of the Council raised concern there was insufficient external amenity space for two dwellings. The dwellings treated as such rather than flats. The site constraints and location of the only external space being located to the front of the site is not ideal and the opportunity to purchase land to enable garden is not an option. There has been no interest to re-use the building for community nor a commercial use, supported by the marketing of the building previously. As already acknowledged, such alternative uses would require bin storage and the lawful re-use of the building for alternative community use would likely give rise to impacts on amenity of neighbouring occupiers.
- 7.4. The Council have been seeking to regenerate the area in and around the town centre through the 'Brighter Future' project. This has earmarked nearby Shellons Street as a green open public space and the soon to be former bus station in Bouverie Square to once again become a public park. Given the existence of some external amenity space on site, whilst falling below the guidance contained in policy HB3, this is a guide. It does not account for specific sites such as this where a more nuanced approach could be taken. The preamble to HB3 at paragraph 9.31 states:
- 'In the case of conversions of existing buildings, balconies or terraces should be provided wherever feasible and where they would not take away from the character of the existing building or street scene'*
- 7.5. Whilst it is acknowledged the development is not for flats, which is where the above is referenced in the PPLP, this is a re-use of an existing building, bringing it back into active use and enabling the retention rather than demolition and wholesale redevelopment. The constraints of the site, similar to many developments of a similar nature do not always allow for accommodating the rigid standards for external amenity space. Developing the site for two flats would have a greater demand than a two bedroom dwelling, respectfully, it is considered in this instance such an allowance should be made given the wider context of the locality where the development is policy compliant in all other respects.
- 7.6. On balance, it is considered that the reduction in the quantum of development, the pressure on the external amenity space is significantly reduced. Taking into account public open space nearby and the lack of an

alternative use for this attractive building to bring it back into use should be afforded significant weight.

8. Highway Impact & Parking

- 8.1. The development is constrained and has no off-road parking at present. It is within a highly sustainable location, as already outlined. Alternatives to the private car are available and all of the day to day needs for future occupiers are within walking or cycling distance with public transport options available by train and bus.
- 8.2. The Council have previously concluded in the most recent application that policy T2 requires for edge of centre locations, such as this, a maximum of 1 parking space per dwelling is required but that given there is a controlled parking zone (CPZ) in the area, a 'zero parking' proposal for the development is acceptable. This was for a two unit scheme previously, so it is not considered that a lower parking demand for one unit development, especially taking into consideration the parking demand of the lawful use of the site and absence of any parking on site.
- 8.3. The proposal also incorporates cycle parking securely within the building, accommodating two cycle parking spaces, which is compliant with development plan policy T5. The previous scheme only made provision for one cycle, where the Council concluded that:

'the deficiency of one space within the development would not lead to an adverse impact upon the prioritisation of active forms of travel as to warrant a reason for refusal'.

- 8.4. Therefore, the scheme is more policy compliant than the previous refusal of permission in that it is fully compliant with policy T5.

9. Other issues

- 9.1. The scheme is not considered to give rise to any impacts on protected or notable species. Ecological enhancements in the form of bird boxes and soft landscaping are proposed which can be secured by condition, once details are finalised post decision. The proposal is exempt from providing the mandatory Biodiversity Net Gain of 10% as it does not affect more than 25sqm of on-site habitat. Existing arrangements for the disposal of foul water will be utilised for the new dwelling. It is envisaged that measures to better insulate and reduce energy consumption including potential for an air source heat pump at a later stage, details of which could be secured by condition.

10. Conclusion

- 10.1. The applicant has worked closely with their designer, heeding the concerns previously raised by the Council to re-imagine how the building could be sensitively brought back into use. The proposed development is policy in compliant with respect to the loss of the community facility, its location, visual impact, residential amenity in relation to living accommodation and impact on existing and future occupiers, and secure cycle parking.
- 10.2. There are few more well located sites than this in terms of sustainability. Well located with respect to services and public transport, the development makes best use of the existing building, which makes a positive contribution to the streetscene. Too often buildings of this nature, which have their challenges are easier to demolish and replace with less sensitive and standardised pattern book style architecture which would be unfortunate.
- 10.3. The internal space will provide for a light, well-proportioned and unique living accommodation. Such a building does require a more nuanced approach to the sole constraint to the site, its size. The external amenity space is not ideal, this is acknowledged. It does provide for some space for future occupiers but seeking to obtain a 10m depth of garden for a two bedroom dwelling in this location is clearly not achievable. Objecting solely on this basis when new public spaces are becoming available in the next 12 months in nearby Shellons Street and Bouverie Square would leave the building without a future.
- 10.4. **Substantial weight**, in accordance with paragraph 125 of the NPPF should be afforded to the value of using suitable brownfield land within settlements for new homes and other identified needs, proposals for which should be approved **unless substantial harm** would be caused.
- 10.5. The delivery of new homes especially where they are located in such sustainable locations, where the scheme is otherwise policy compliant and there is clearly a context, as set out above, should not lead to a refusal of permission. The harm caused would not be substantial. Future occupiers of a two bedroom flat would only be afforded a 1.5m depth.
- 10.6. The provision of energy efficiency measures, ecological and landscape enhancements alongside a sensitive re-use of the building should all be afforded a degree of weight in the planning balance.
- 10.7. In conclusion, the proposed developed would comply with all but part of development plan policy HB3, however, material considerations as set out above would indicate planning permission, subject to conditions should be granted. Should there be any concerns with the proposal or clarification is required, prior to determination, then the applicant would be willing to negotiate with the Council to avoid a refusal.