[redacted]

[redacted]

**From:** John Tomlin [redacted]
**Sent:** 06 November 2025 15:51
**To:** Ross McCardle [redacted]
**Subject:** RE: 25/1759/FH at Plot G, Pearl Court, Howey Road, Mountfield Industrial Estate, New Romney, TN28 8GS

Hi Ross

In anticipation of the committee meeting next week, I wanted to confirm the following to you.

In relation to the below, taking from the committee public report packs.

17. The units hereby permitted shall be used for purposes falling within Classes B8 or E(g) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended) and for no other use whether permitted by the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (or any order revoking or re-enacting that Order) or not.

    **Reason**: In the interests of the amenities of the area.

We believe this to be an incorrect assessment of the use class. The proposed use of the site as a coach and minibus depot should be classed as sui generis, not Class B8 or Class E. The operation involves the parking, dispatch and management of passenger vehicles, which is distinct from B8 storage and distribution (concerned with goods rather than vehicle operations) and Class E commercial uses. Coach and bus depots are consistently treated in planning practice and appeal decisions as sui generis due to their specific operational characteristics, including regular vehicle movements and associated activity, which are not comparable to standard industrial or storage uses. This has been further confirmed via the applicant when they moved into their existing premises and had to apply for a change of use prior to occupation.

Taking the above into account, we also believe the below comments from KCC highways issued on the 2nd October is using the wrong interpretation of the development's use class.

5) The proposed minibus parking spaces do not meet minimum size standards of 4 metres in width by 8 metres in length.
6) The proposed coach parking bays do not meet minimum size standards of 4 metres in width by 15 metres in length. They also do not have adequate reversing space due to the proposed bin store and site layout constraints.

The proposed parking arrangements are intended solely for the storage of the applicant's private fleet in connection with a sui generis coach and minibus depot use and will not be available for public or

third-party parking. As such, strict adherence to standard bay dimensions is not necessary, as the spaces will be used exclusively by trained drivers familiar with the site layout and vehicle movements. Should the site ever be used as a public or commercial coach park, this would constitute a material change of use and require a new planning application, at which stage standard parking design criteria could be reassessed.

There are four other outstanding comments which I will respond to below in red:

1)The proposed access gate needs to be set back at least 5.5 metres from the edge of the footway to enable a car to safely pull of Howey Road whilst the gates are being opened. Revised on 7747-P-04 Rev B. Attached

2)No details of visibility splays have been provided out of the proposed site access. Visibility splays of 2.4 metres by 43 metres in both directions are required. This will be included on the revised Tridax drawing T-2025-003-05. This will be submitted by the end of this week

3)Vehicle tracking needs to be submitted to show that a coach can enter the site from Howey Road, turn around and then exit in forward gear. This is included on Tridax drawing T-2025-003-05 already submitted

4)No disabled car parking spaces are currently provided. A minimum of 2 disabled spaces are required and need to meet size standards of 3.7 metres in width by 5.5 metres in length. Revised on 7747-P-04 Rev B. Attached

Hopefully this gives enough you enough time to action before next week's meeting but anything else required, please do let me know. Can you confirm the use class change, this is important.

Regards

John

KENTEC DRAUGHTING SERVICES LTD

John Tomlin
Managing Director

[redacted]

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**From:** Accounts
**Sent:** 02 October 2025 13:55
**To:** Ross McCardle [redacted]
**Subject:** RE: 25/1759/FH at Plot G, Pearl Court, Howey Road, Mountfield Industrial Estate, New Romney, TN28 8GS

Hi Ross

Thank you for your email.

John will ensure that all items are actioned. In the mean time, I just wanted to check that you had seen the attached plan that demonstrates the vehicle tracking?

It is an appendix in the drainage design report, but I am attaching here separately as it may satisfy one of the points in the KCC list.

Kind regards
Laura

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**From:** Ross McCardle [redacted]
**Sent:** 02 October 2025 10:26
**To:** Accounts <Accounts@kentecds.co.uk>
**Subject:** FW: 25/1759/FH at Plot G, Pearl Court, Howey Road, Mountfield Industrial Estate, New Romney, TN28 8GS

Dear Mr Tomlin,

KCC Highways have requested further information / amendments to the layout, as attached.

I am trying to get the application on to the agenda for the meeting on 11 November, so would be grateful if you could address ASAP.

Please let me know if you have any questions.

Kind regards,
Ross.

**Ross McCardle MA PGDip MRTPI | Principal Planner**
Folkestone & Hythe District Council
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[redacted]

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