



PLANNING STATEMENT

Submission to Folkestone and Hythe District Council

Change of use of existing annexe accommodation to provide a standalone dwellinghouse

Annexe at Near Miss
Cockreed Lane
New Romney
TN28 8TE

June 2025

1.0 INTRODUCTION

This Planning Statement has been prepared by Kent Planning Consultancy Ltd ('the Agent') on behalf of Mr and Mrs Kerr ('the Applicant') in support of a submission for Full Planning Permission for a residential scheme at:

Annexe at Near Miss, Cockreed Lane, New Romney, TN28 8TE

(hereafter referred to as the "Site"), as shown on the Site Location Plan.

The description of development is as follows:

Change of use of existing annexe accommodation to provide a standalone dwellinghouse

This application is for the formation of a standalone dwellinghouse. Whilst the unit has been occupied as a separate residential unit for some time, this has not been formalised in planning terms.

We argue that this is a policy compliant scheme, and whilst it is outside of the defined built confines for New Romney, there are other material circumstances which argue why planning permission should be granted in this instance.

Recent planning history has also set a precedent which renders the principle of development in this location as acceptable.

We respectfully request that planning permission be granted, for the reasons set out in this report.

2.0 SITE LOCATION & CONTEXT

The application site is a two-storey residential annexe currently associated with the detached dwellinghouse known as 'Near Miss'. The property sits at the fringe of the settlement boundary for New Romney, which is described as a Strategic Town in the Folkestone and Hythe settlement hierarchy.

The plot itself comprises 0.17ha. It sits to the rear of 'Near Miss' and is accessed from an unadopted trackway leading north from Cockreed Lane.

The building benefits from lawful status as an annexe, by virtue of passage of time. This was established in the assessment of planning application 22/1592, where the officer concludes:

"It is evident from aerial photography that an outbuilding has been present at the site since at least 1990 which was extended at some point between 1990 and 2003. It is also evident from aerial photography that the entire site has been used for residential purposes since at

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least 2017 owing to the domestic paraphernalia throughout the site including a gazebo and what appears to be a BBQ area to the very north of the land, an additional outbuilding to the eastern boundary and several other, small buildings along the western boundary, together with an outside seating area. It is also noted that the existing building was registered for council tax as an annexe to Near Miss, Cockreed Lane in 2020. As such the proposal has been assessed on the basis that it is an extension to a residential annexe.”

Furthermore, this application granted planning permission for the extension to the annexe structure, and thus the building and its annexe use are regularised.

The building is a three-bedroom property, with all bedrooms on the first floor. Gross Internal Area (GIA) is arranged as follows:

Ground Floor Plan: 125.8sqm

First Floor Plan: 70.6sqm

Total Floor Area: 196.4sqm

The positioning of this property in the context of Near Miss means that it benefits from external amenity space by way of a driveway and courtyard area and a rear garden area to the northwest. There are two incidental outbuildings either side of the main building.

The application site is within Flood Zone 2 and 3 and is within a Local Landscape Area.

3.0 PLANNING HISTORY

Immediate planning history

22/1592/FH – Erection of a single storey side and first floor extension to existing annexe – planning permission granted.

Y09/0909/SH – erection of a two-storey detached dwelling a detached single dwelling – Refused due to locational sustainability (1), flood risk (2) and visual impact. Refusal was upheld at appeal for reasons (2) and (3).

We highlight that since this time, the settlement boundary for New Romney has been amended to include land up to 40m south of the application site. The character of the area has also evolved significantly since this time and is now built up and the development now proposed utilises existing built form.

4.0 PLANNING POLICY AND BACKGROUND

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that where the Development Plan contains relevant policies, applications for development which are in accordance with these policies should be allowed unless material considerations indicate otherwise.

The National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) are material considerations.

National Policy

National Planning Policy Framework - NPPF (2024)

The NPPF sets out the Government’s planning policies for England and puts “*the presumption in favour of sustainable development*” at the heart of the planning system.

The following chapters are relevant to the proposal:

- Chapter 2 – Achieving Sustainable Development
- Chapter 4 – Decision Making
- Chapter 5 – Delivering a sufficient supply of homes
- Chapter 11 – Making effective use of land
- Chapter 12 – Achieving well-designed places
- Chapter 14 – Meeting the challenge of climate change, flooding and coastal change

Local - Ashford Local Plan 2030 (Adopted Feb 2019)

The Development Plan for the Folkestone and Hythe District comprises the Core Strategy Review (2022) and the Places and Policies Local Plan (2020).

The relevant policies are:

Core Strategy 2022

- Policy SS1 – District Spatial Strategy
- Policy SS3 – Place-shaping and Sustainable Settlements Strategy
- Policy CSD8 – New Romney Strategy

Places and Policies Local Plan 2020

- Policy HB1 – Quality Places Through Design
- Policy HB3 – Internal and External Space Standards
- Policy HB10 – Development of Residential Gardens
- Policy T2 – Parking Standards
- Policy T3 – Residential Gardens
- Policy CC1 – Reducing Carbon Emissions

Other Considerations – Nationally Prescribed Space Standards

Folkestone and Hythe District Council has policies in support of the use of NPSS, and as such they apply within the Borough. It is anticipated that all development will be in accordance with, or in excess of, NPSS requirements.

5.0 PROPOSED DEVELOPMENT

The description of development is as follows:

Change of use of existing annexe accommodation to provide a standalone dwellinghouse

This application proposes to change the use of the annexe to provide a dwellinghouse. No additional built form is proposed. The originally proposed pitched roof over the kitchen is now a flat roof, no other external amendments are proposed.

The curtilage of Near Miss would be split, providing each property with external amenity space. The existing access would be utilised for the 'new' dwelling, off of the private trackway.

No internal configuration is proposed.

6.0 PLANNING ANALYSIS

Principle of Development

As stated previously, the site immediately adjacent to the settlement boundary for New Romney, which is described as a 'Strategic Town' in the Folkestone and Hythe Core Strategy. Such locations are higher up in the settlement hierarchy where new development would generally be directed.

Whilst not precisely within the defined boundary, the site benefits from the same levels of locational sustainability as land 40m to the south, which is within the settlement boundary. The centre of New Romney is approximately 500m walking distance, approximately 5-10 minutes-walk. New Romney is a highly sustainable settlement complete with an attractive walking route, where it is level and adorned with pavements and street-lighting.

As discussed, we acknowledge that the previous application for a dwelling in this location was refused and dismissed at appeal. The Planning Inspector however, when discussing sustainability concluded the following:

“Although the location of the appeal site outside the defined settlement boundary renders the proposal unacceptable for other reasons, as already detailed, I am less concerned about its implications for objectives of sustainable development. Despite its countryside location, the site is readily accessible on foot from New Romney town centre, which provides a wide range of local facilities and access to public transport”

This situation is now actually improved with recent housing development which have improved pedestrian access to the town.

Furthermore, a residential use is already permitted here by virtue of the existing annexe accommodation. Whilst not a standalone dwelling, the application site already benefits

from its own access and if occupied at capacity the impact of an additional dwellinghouse would not be materially different verses the continued use of the annexe.

We also highlight that the use of existing buildings to contribute to housing supply has significant benefits in terms of environmental sustainability, and this is recognised within the NPPF.

Therefore, we conclude that the principle of development is acceptable in line with the overall objectives of the NPPF and the Folkestone and Hythe Spatial Strategy.

Character and Visual Amenity

The application seeks a change of use of an existing lawful structure where no additional built form is proposed. The roof form has been amended to a flat roof (previously was proposed as pitched) however this is less visually impactful. Therefore, there is no adverse impact on the wider character of the landscape and no impact on views.

Whilst technically a countryside location, the character of the area has significantly changed in recent years. With significant development between the south of the site and the New Romney town centre.

The configuration of a dwellinghouse in this location is also not uncharacteristic for the area. Whilst there is an established ribbon of development fronting Cockreed Lane. There are also residential properties further to the northwest along the private track, so the formation of a new dwelling in this location is in keeping with the urban grain.

We therefore conclude that the change of use is acceptable in terms of impact on character and visual amenity.

Residential Amenity

Existing Occupiers

The building is already lawful for residential purposes being an annexe, so impacts as a result of the development would not be materially different from what they are now. No additional built form is proposed, so there would be no overbearing or overshadowing impacts.

The overall size of the site is large enough that when split, Near Miss itself will still benefit from a generous plot with sufficient external amenity space.

Proposed Occupiers

The site of the existing structure would comply with space standards for a new dwellinghouse and can afford future occupiers a very good standard of amenity. It also benefits from a generous external amenity space.

Flood Risk

The application is within Flood zone 2 and 3. In this case, this is an existing structure so the development would not exacerbate flood risk elsewhere. Furthermore, the lawful use of the building is already residential overnight accommodation, and therefore the change of use does not introduce any vulnerable development.

Notwithstanding this, it should be noted that the site is outside the flood extent of a 0.1% AEP CC (2115) event when the sea defences are taken into consideration.

A Flood Protection Scheme was also completed at the Hythe Ranges which now provides an increased standard of protection to 1 in 200 levels.

A letter from the Environment Agency dated 28th January 2022 relating to the adjoining site, application reference number 21/2385/FH states that:

“Since the Environment Agency’s Romney Marsh 2020 model, which uses different sea level allowances to the Shepway modelling, does not show any impact on the site from a breach at Hythe Ranges we have not objected to the application”

An application on the adjoining site was also submitted but withdrawn, however the advice from the Environment Agency stated that:

“Although this ‘more vulnerable’ development is defended it still at ‘moderate’ to ‘significant’ risk in breach modelling performed as part of the Folkestone and Hythe District Council’s Strategic Flood Risk Assessment.

The flood level for a 1 in 200 design event accounting for climate change is 2.58mAOD, relating to a 0.35m depth of flooding.”

The details submitted for that application shows that the ground floor finished floor level would be set at 2.88mAOD, 300mm above the design flood level, which is the same scenario at the application site. All sleeping accommodation is located on the first floor, as shown on the application drawings.

Electrical supplies are kept at a minimum 1050mm above finished floor level within the dwelling for an additional safeguard against any damage from the unlikelihood of localised surface water flooding. All walls at ground floor level will also be blockwork and hard plastered rather than plasterboard on Dabs as added precautions.

Surface water downpipes connect into 5no. 300l Slim Wood Decor Rainwater Wall Tanks with overflow discharging into a surface water drainage system. Reclaimed water will then be used within the property for the watering of plants and car washing.

Therefore, we advance that the change of use is acceptable on flood risk grounds.

Highways and Transportation

The property already benefits from its own access, this arrangement is therefore already acceptable in terms of facilitating access to a family home. The change of use would not result in any additional pressure on the local highway network, and parking can easily be accommodated on site in line with the adopted parking standards.

The development is therefore acceptable in terms of highways and transportation.

Ecology

This is a change of use of an existing building, therefore there are no biodiversity impacts and the development falls within the de minimis exemption from Biodiversity Net-gain.

7.0 CONCLUSION

This planning statement accompanies a planning application for:

Change of use of existing annexe accommodation to provide a standalone dwellinghouse

This application is for the formation of a standalone dwellinghouse. Whilst the unit has been occupied as a separate residential unit for some time, this has not been formalised in planning terms. No external works or built form is proposed.

We argue that the change of use represents sustainable development in line with the objectives of local and planning policy, where there is no planning harm identified.

We therefore respectfully request that planning permission be granted.