



MAPLE
— PLANNING &
DEVELOPMENT LTD

Planning Services
Ashford Borough Council
International House
Dover Place
Ashford
TN23 1HU

20/10/25

Ref: 028

Dear Sir/Madam,

Land at Elvey Farm, Elvey Lane, Pluckley, TN27 0SU

This submission represents a prior notification of my client's intention to exercise the permitted development rights conveyed by Class Q of Part 3 to Schedule 2 of the Town and Country Planning (General Permitted Development) Order (the GPDO).

The proposed works comprise the conversion of an existing agricultural building into two dwellinghouses, each no greater in size than 150 square metres.

The aforementioned legislation dictates that such conversion is capable of automatically benefitting from a grant of planning permission, subject to compliance with a number of criteria.

In the event that those criteria are addressed, then it is incumbent upon the landowner to notify the local planning authority of his/her intention to utilise those rights. In so doing the Council are limited to consideration of matters relating to highways, contamination, noise, flood risk, design, and natural light.

Given the foregoing, this supporting statement will be ordered as follows:

- 1) An assessment of the proposed works against the detailed criteria of the GPDO, to prove that the works are capable of comprising permitted development; and
- 2) An overview of what is proposed in terms of considerations relating to highways, contamination, noise and flood risk.

The Legislative Requirements

In terms of the legislative requirements of the GPDO:

- The building was last used for agricultural purposes, as part of an established

agricultural unit. Prior approval was previously granted, under reference 21/00105/AS, for conversion to business use, pursuant to Class R permitted development rights. However, that prior approval was never implemented, and has now lapsed;

- The floorspace of each dwellinghouse proposed does not exceed 150 square metres;
- The cumulative number of separate dwellinghouses to be developed does not exceed 10 (comprising only 2 dwellinghouses). The floorspace to be converted does not exceed 1,000 square metres (being only 300 square metres).
- The site is not occupied under an agricultural tenancy, and such a tenancy has not been terminated in recent years;
- No development under Class A or Class B of Part 6 to Schedule 2 of the GPDO has been carried out within the last 10 years;
- The development would not result in the external dimensions of the building extending beyond the external dimensions of the existing building at any given point;
- The development will not consist of any building operations other than the installation or replacement of windows, doors, roofs, or exterior walls; or water, drainage, electricity, gas or other services; or partial demolition to the extent reasonably necessary to carry out building operations allowed.
- The site is not on Article 2(3) land;
- The building is not, and does not form part of, a site of special scientific interest, a safety hazard area, or a military explosives area;
- The building is not listed, and the site does not contain a scheduled monument;
- The proposal is compliant with the Nationally Described Space Standard; and
- The building has suitable access to a highway.

Please note that paragraph Q.1(i)(ii) specifically allows for partial demolition to the extent reasonably necessary to carry out the building operations allowed.

Additionally, the prior notification is accompanied by a structural survey, which comprehensively demonstrates that the subject building is structurally sound, and is capable of conversion without significant rebuilding, repair or modification.

In light of the foregoing, it is clear that this proposal passes the legislative tests of the amended GPDO, and that this proposal to convert the building into 2 dwellinghouses is permitted development.

Therefore attention must turn to the matters up for consideration.

Material Considerations

The GPDO establishes that where the development proposed is development permitted by Class Q (which this proposal is) then the Council must assess whether prior approval is required in respect of:

1. The transport and highways impacts of the development;
2. The noise impacts of the development;
3. Contamination risks at the site;
4. Flooding risks at the site;
5. The design and external appearance of the building; and
6. The provision of natural light to all habitable rooms.

These issues shall be addressed in turn as follows.

Highways – The proposal utilises an existing vehicular access to the site. The lawful agricultural use of the building would be capable of generating significantly more vehicular movements, and by much larger vehicles, than two dwellings as proposed.

There is therefore a demonstrable improvement in highway safety and convenience terms.

Noise – Whilst there are existing residential properties proximate to the site, they are not so close that residential conversion of the barn in question would give rise to noise disturbance.

Certainly, residential occupation of the building would generate considerably less noise than that which would be capable of being generated by the lawful agricultural use.

Contamination – The site has not been used for any purposes that would give rise to unexpected contamination above and beyond that which would be associated with any standard agricultural operation.

To be certain on this point, the applicant secured a contaminated land assessment, which accompanies this submission.

Flooding – The site is not in an area that is identified as being at risk of flooding.

Design and External Appearance – The building in question is a standard, utilitarian agricultural building of no great architectural value.

The proposal - through partial demolition, and the incorporation of high quality facing materials – will significantly improve the design and external appearance of the building, whilst retaining a utilitarian rural vernacular. The partial demolition proposed includes the removal of a dilapidated pole barn, which will enhance the setting.

Additionally, the submitted drawings show a curtilage serving both properties which is no larger than the land area occupied by the building

Natural Light – All habitable rooms will benefit from a meaningful amount of glazing, ensuring that there are good levels of daylight and sunlight serving the dwellinghouses proposed.

Given the foregoing, it is concluded that the proposal is permitted development by virtue of

Class Q of the GPDO, and that none of the matters that are for consideration present any reasons why the Council should conclude that prior approval is required or that, if it is, that it should not be forthcoming.

I trust that sufficient information has been provided in order to allow the submission to be registered. However, if you should require any additional information then please do not hesitate to contact me.

Yours faithfully,

Paul Webster MRTPI
DIRECTOR