



# Planning and Development

Email: Planning.help@ashford.gov.uk  
Direct Line: (01233) 330626  
Our Ref: PRE/2024/0109  
Date: 20, December 2024



Civic Centre  
Tannery Lane  
Ashford, Kent  
TN23 1PL  
(01233) 331111  
www.ashford.gov.uk

 @ashfordcouncil  
 AshfordBoroughCouncil

Dear 

**Location:** Vicarage And Glebe, Ashford Road, St Michaels, Tenterden, TN30 6PY  
**Proposal:** Erection of 15 dwellings, new road junction, biodiversity net gain and woodland buffer zone

I write further to your request for the pre-application advice in connection with the proposed development at the above address.

I write further to our pre-application request in connection with the proposed development at Vicarage And Glebe, Ashford Road, St Michaels, Tenterden, TN30 6PY. Please be advised that the application was also discussed at a higher level Case Review Meeting held with the Managers including Assistant Director of Planning, Spatial Planning Manager, Strategic Development and Delivery Manager and Planning Applications and Building Control Manager and Team Leaders.

The proposal relates to the development of land located outside the built-up confines of Tenterden. The pre-application proposal seeks to establish the principle of residential development in this location and provides detailed feedback regarding the layout and design of the development.

## **Site and surroundings**

The application site comprises the enclosed Glebe Field, situated to the rear of the Vicarage. It is understood that the site has historically been used for keeping horses and as amenity land associated with the dwelling. The site is bounded by the Vicarage and Ashford Road to the west, beyond which lies an established residential area contiguous with urban Tenterden. To the south, the site is bounded by Glebe House, the partially constructed 62-bedroom care home at Kent House, and a section of Dawbourne Wood.

## **Layout**



The proposal is for 15 dwellings, alongside associated infrastructure such as a new road junction and landscaping. While the compact scale of the scheme limits opportunities for extensive features, careful consideration of the internal layout is crucial to ensure functionality, visual appeal, and effective integration with the surrounding area.

The internal road layout adopts a cul-de-sac design with a single access point from Ashford Road. This layout is appropriate for a small development, simplifying vehicular circulation while minimising hard surfacing. It is noted that there are footpaths proposed on either side of the access. It is suggested that the pedestrian path abutting Glebe House be removed, and the access road slightly narrowed to reduce its dominance.

The plot arrangement aligns the dwellings efficiently along the cul-de-sac, with each benefiting from private driveways and rear gardens. This layout effectively utilises the site, but the uniformity of the plots may result in a monotonous streetscape. To enhance visual interest, subtle adjustments such as reorienting corner plots could create variation but equally ensure that garden depths and boundaries provide sufficient privacy and amenity for future residents.

The internal footpath located behind units 12, 13, 14, and 15 is a notable feature of the layout. While it may offer secondary pedestrian access or facilitate movement between plots, its inclusion in a development of this scale raises concerns. The compact nature of the site and existing front access reduce the necessity for a rear path. Furthermore, the footpath significantly reduces garden depths, limiting private outdoor space for these units and potentially compromising privacy and security.

The footpath should be removed, and the rear gardens for these units extended to provide more usable and attractive private amenity space. This adjustment would enhance the overall quality of the development, reduce maintenance burdens, and align better with the compact and residential nature of the scheme. Any requirements for rear access, such as for bin storage, can be addressed by integrating direct access through side passages where feasible.

Similarly, the need for the footpath adjoining plot 11 is questionable in a development of this scale. Plot 11 is a small plot with a small garden. The presence of the footpath limits the private outdoor space for this unit. This footpath should be removed also and the Plot 11 garden enlarged.

Landscaping is primarily focused on boundary treatments and the retention of existing vegetation along the peripheries of the site. This is a positive feature, contributing to the site's character and ecological value. However, there is limited soft landscaping within the layout itself outside of individual property boundaries. Enhancing plot frontages with low-maintenance planting would soften the appearance of the development and

improve biodiversity but it can be difficult to secure in the long term. -The development would benefit from additional tree planting outside individual plot boundaries that can be more successfully secured in the longer term. The build-out into the carriageway with two trees in front of the unit 5 parking is supported. Similarly, there is scope for planting outside property boundaries in the verges adjoining units 11 and 12 and the pockets to either side of the access to unit 18. It would be helpful to provide an open space management plan as part of any future planning application so that it is clear what areas are in the ownership of the management company/private ownership.

In terms of the relationship between units, there are concerns that need addressing. Units 10 and 11 present a challenging arrangement that could harm the residential amenity of future occupants. The close proximity of these units and their orientation create potential issues of dominance and interlooking, particularly between habitable spaces. Such a relationship could lead to a lack of privacy and negatively affect the living conditions of the future residents. Similarly, units 12, 13, 14, and 15 exhibit interlooking and dominance concerns. Their arrangement results in direct overlooking of private amenity spaces, which are already limited in size. To some extent this could be resolved with careful window placement at first floor level.

The private gardens for units 5, 6, 7, and 8 raise concerns regarding their size and quality, as these spaces are likely to be overshadowed by the retained trees along the northern boundary of the site. While the retention of these trees is essential for biodiversity and the site's character, their proximity could lead to poor daylight levels and limit the usability of these gardens. The relatively wide width of these plots created by the side-by-side parking is essential in helping to ensure sufficient sunlight to rear garden areas. Nevertheless, over time, the proximity of trees may create pressure for the trees to be trimmed or removed, undermining their ecological value. To address this, the layout could be reconfigured to increase the separation between the gardens and the trees, allowing for more daylight to penetrate. Additionally, adjustments to the depth of these units by introducing shallower building types should be explored to optimise garden usability. A robust landscaping strategy should also be implemented to ensure the retained trees are well-managed and do not become a source of conflict for future residents.

In conclusion, the scheme faces some challenges concerning the internal layout, particularly regarding unit relationships, private amenity space, and overshadowing. Addressing these issues through thoughtful design refinements—such as removing footpaths, increasing trees outside property boundaries, enhancing garden sizes, potentially reducing the number of units to address amenity concerns, reorienting units to reduce interlooking, and mitigating the impact of overshadowing—will improve the overall quality and functionality of the development. For the avoidance of doubt, it should be clarified that the detailed design of the units is not part of this assessment and will be critical in determining the overall quality of the development. (It has been assumed for the purposes of this pre-app that these are standard 2-storey homes. Properties above 2-storey would not be appropriate on what is a 'tight' site in a 'backland' situation. Some variations to the eaves and ridge height between units would assist in providing a more semi-rural response in this context. ie. giving the appearance of a development that has evolved over time and adding variety to the street scene.)

### **Highways**

KCC Highways and Transportation would be consulted on any formal application submitted. Please note that KCC have their own preapplication process. An informal opinion could therefore be sought via this process. Below is the link to KCC preapplication service:

<https://www.kent.gov.uk/environment-waste-and-planning/planning-and-land/planning-applications/planning-advice/highway-pre-application-advice>

Policy TRA3(a) would apply in this instance. A minimum of 2 parking spaces for each 2 or 3 bedroom property should be expected, and 4+ bed properties require 3 parking spaces. Visitor parking spaces should be provided within the highway layout at a minimum of 0.2 spaces per unit.

### **Residential Amenity**

The National Planning Policy Framework (NPPF) identifies the provision of a good standard of amenity for existing and future residents as a core planning principle. It is imperative that the proposed development demonstrates how residential amenity will be safeguarded for all affected parties, including those occupying the new dwellings and the existing residents in the immediate vicinity. Ensuring this will be essential for the acceptability of any formal planning application.

The proximity of the proposed development access to existing properties, specifically Vicarage to the north and Glebe House to the south, presents a potential risk of negatively impacting residential amenity. These impacts could include increased noise, disturbance from vehicular movements, and a reduction in privacy due to the intensified use of the access point. Careful consideration should be given to these potential effects to minimise disruption to existing residents and ensure their living conditions are not unreasonably harmed.

Should a formal application be submitted, it must include a Noise Impact Assessment prepared by a suitably qualified professional. This assessment should identify the potential sources of noise associated with the development, such as traffic movements along the new access road, and evaluate their impact on both existing and future residents. The accompanying Mitigation Strategy should detail specific measures to address these impacts, such as:

- The use of acoustic fencing or landscaping buffers along the access road to reduce noise transmission to adjacent properties.
- Implementation of low-noise road surfacing materials to minimise disturbance caused by vehicular traffic.
- Restrictions on construction times and operational hours for deliveries or services to further mitigate potential impacts.

Furthermore, the detailed design of the development should ensure adequate separation distances and appropriate screening between new and existing dwellings to maintain privacy and prevent overshadowing. For example, careful positioning of windows, boundary treatments, and landscaping should be incorporated to avoid overlooking into adjacent properties.

For future residents, as discussed in the response above, the proposed layout should ensure that all dwellings benefit from sufficient natural light, ventilation, and private outdoor amenity space in line with national and local standards. Rear gardens, where provided, should meet minimum space standards and be appropriately screened to offer a reasonable degree of privacy.

In conclusion, maintaining a high standard of residential amenity for both existing and future residents will be a critical aspect of the development's success. The inclusion of a robust Noise Impact Assessment, alongside thoughtful design and appropriate mitigation measures, will be essential to ensure compliance with the NPPF and local planning policies.

### **Ecology and Trees**

The EU Habitats Directive 1992, requires that the precautionary principle is applied to all new projects, to ensure that they produce no adverse impacts on European Sites. Regard has been had to Natural England's Standing Advice which suggests that in rural areas, the likely presence of bats, breeding birds, badgers, reptiles, and great crested newts could be expected. The application site is in a rural location. The site is surrounded by dense mature trees/hedges. The surrounding area contains established trees and hedgerows which could provide habitat for protected species.

The presence of established trees and hedgerows around the site further increases its ecological value, as these features often serve as critical wildlife corridors or nesting and foraging habitats. Consequently, it is essential that any planning application for this site is accompanied by a comprehensive suite of updated ecological surveys. This requirement was previously identified within the withdrawn scheme and remains a vital step to ensure compliance with legal and policy obligations. These surveys should specifically assess the potential impacts of the development on protected species and their habitats and identify appropriate mitigation and enhancement measures.

In addition to addressing ecological constraints, the development must demonstrate how it will deliver at least a 10% Biodiversity Net Gain (BNG) in line with current legislative and policy requirements. This could include the retention and enhancement of existing natural features such as trees and hedgerows, the creation of additional habitats, or other on-site biodiversity improvements.

It is also important to note that KCC Ecology will be formally consulted at the application stage. Early engagement with KCC Ecology is encouraged to address any concerns proactively and minimise delays in the planning process.

Further to this, any application submitted should be accompanied by an Arboricultural Report and

Arboricultural Impact Assessment (Arb IA) to assess the impact of the proposed development on the trees and provide appropriate mitigation measures.

### **Affordable Housing**

The proposal would be required to make provision for 40% affordable housing in line with policy HOU1 of the local plan.

### **Drainage and Sewerage**

Any application should be supported by detailed investigations to demonstrate that the proposed surface water disposal is the appropriate method. This should include details of soakage testing and capacities of surface drainage features, as appropriate. The chosen method of surface water drainage should be taken into account when considering the developments impact on flood risk.

The development would also need to be provided with a connection to the sewerage system at the nearest point of adequate capacity. As such, you may wish to discuss this matter with the relevant utilities company prior to submitting an application, to undertake capacity checks and ensure that adequate provision can be made without increasing the risk of localised flooding.

### **Conclusion**

It is felt that there is a potential for residential development on this site subject to satisfying the key considerations such as appropriate layout and design, highways, residential amenity, ecology, and infrastructure. However, several challenges remain, particularly regarding the internal layout, relationships between units, and the adequacy of private amenity spaces. Addressing these issues through thoughtful design refinements—such as removing unnecessary footpaths, enhancing garden sizes, reducing the potential for overshadowing, and mitigating impacts on privacy—will improve the scheme's quality and functionality.

In addition, the application must demonstrate compliance with local and national planning policies, particularly in relation to affordable housing provision, biodiversity net gain, noise mitigation, and drainage strategies. Early engagement with key stakeholders, including KCC Highways, KCC Ecology, and the relevant utilities companies, is encouraged to ensure that all technical matters are resolved prior to submission.

You will appreciate that this advice is given at officer level only and is not legally binding on the Council. Should you decide to submit a planning application, additional issues may arise during the advertisement and public consultation period requiring further consideration of the matters. Further pre-application advice will command an additional fee.

I trust that this advice is of assistance.

Yours sincerely,

  
Development Management Team 

### **Notes for your information:**

1. When you make an application please ensure that it meets the requirements of the council's validation advice note and that a validation checklist appropriate for the type of application is completed and submitted with it.
2. The advice note and relevant checklist can be accessed via the "Applying for planning permission" pages of the council's website ([www.ashford.gov.uk](http://www.ashford.gov.uk)) on the "Is in my application valid" page.
3. The advice given by Council Officers for pre-application enquiries does not constitute a formal response or decision of the Council with regards to any future planning application. Any views or opinions are given in good faith, and to the best of ability, without prejudice to the formal consideration of any planning application.
4. The final decision on any application can only be taken after the Council has consulted local people, statutory consultees and any other interested parties.

5. A final decision on an application will be made by senior officers or by the council's Planning Committee and will be based on all the information available at that time.
6. This advice will be carefully considered in reaching a decision or recommendation on any resulting applications; subject to the proviso that the circumstances and information may change or come to light that could alter the position. It should be noted that the weight given to pre-application advice will decline over time.
7. It should be noted that if the planning application is delayed for a significant period then any pre-application advice may be overtaken by changes in national, regional or local policy and guidance