

VERNACULAR HOMES

— design & build —

Demolition of Fairlight and the erection of 2no. dwellings with private amenity alongside associated landscaping, parking and access at Fairlight, Swain Road, Tenterden, Kent, TN30 6PD

Design and Access Statement

6th February 2026



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1. Introduction

The existing site consists of a twentieth century property set within a large plot to the South side of Swain Road. The proposal is to demolish the existing property and construct two detached dwellings with road frontage.

Planning consent has previously been applied for 4No. semi-detached dwellings on this site under reference PA/2025/0577 and subsequently for 2No. detached dwellings under reference PA/2025/1924. This earlier application was refused due to concerns of overdevelopment; principally as a result of the higher number of dwellings, their semi-detached nature and the resulting higher density. The most recent application for 2 dwellings was for a larger scheme and has been withdrawn pending resubmission of this revised and reduced layout.

The current proposals represent a significant reduction in size from previous schemes and have reviewed almost every parameter: position, orientation, floor area, eaves and ridge lines. The designs have been dramatically redeveloped in order to reduce the massing and proportions and the two units now have greater individuality in their design approach.

The planning statement from PA/2025/0577 is included within the Appendix and whilst refers to 4No. dwellings rather than the 2No subject to this application, in planning policy context the discussion within remains relevant.

2. Amount, Scale and Layout

2.1. Floor Area (GIA)

Existing	Ground Floor	First Floor	Total	Footprint
Existing Dwelling (inc. attached garage)	99m ²	-	99m ²	110m ²
Outbuildings				20m ²
Total			99m²	130m²

Proposed	Ground Floor	First Floor	Total	Footprint
Unit 1	74.7m ²	67.2m ²	141.9m ²	89.5m ²
Unit 2	78.4m ²	57.9m ²	136.3m ²	93.0m ²
Cycle storage				4.3m ²
Total			278.2m²	186.8m²

There is a modest 43% increase on the existing footprint on site. The increase in floor area is substantially a result of the two-storey design.

2.2. Scale

The properties have varying eaves and ridge heights from proposed finished floor level. For context, these are compared in the table below to the existing floor level of Fairlight and its relationship to the neighbouring properties either side: -

	Existing	Proposed		Neighbouring	
	Fairlight	Unit 1	Unit 2	Oakfield House	Logrunner
Eaves height*	+2.25m	+2.9m(front) +3.8m (side rear)	+5.2m	+5.8m	+5.1m
Ridge height*	+4m	+7.8m	+7.3m	+8m	+8.9m

** approx. max. eaves and ridge heights compared with existing floor level of Fairlight.*

The proposed units are of a smaller scale than that of the surrounding dwellings and the ridge and eaves height will be comparable or lower than the nearest neighbours.

The lower eaves and 1.5 storey design to Unit 2 and the rear of Unit 1 serve to reduce the massing and impact of the proposal.

2.3. Layout

The houses are carefully positioned in relationship to each other and the site boundaries in order to create private garden areas and present an attractive approach to both properties. The proposed dwellings are set back further than the existing which serves to enhance the feeling of space and benefits the street scene.

The dwellings are rotated to slightly different orientations which serves to give a relaxed and informal composition, widens the sense of space between dwellings and follows the gently curving street scene as it transitions from Swain Road to Ox Lane.

3. Appearance

3.1. Materials

The proposal involves a simple palette of materials used elsewhere within the locality: -

- Brickwork to blend with neighbouring houses to the East.
- Plain nib tiles to the roof.
- First floor tile hanging to sections of Unit 1.
- White framed windows.

These materials are consistent with those of the locality which has a wide mix of housing types and styles.

3.2. Design

The design of the existing bungalow is plain with simple brick elevation, concrete tiled roof and flat roofed attached garage. The new dwellings provide clear entrance to the front elevations with a simple and attractive composition of the façade. There are significant differences in the design and form of the two units in order to create interest and variation.

4. Appraisal of context

4.1. Appraisal of context

Swain Road contains a wide variety of housing styles with residential gardens and driveways fronting the road. The build line is staggered and informal. The proposed scheme follows this general pattern.

The street scene is dominated by buildings up until the junction with Ox Lane to the East of the site. From this point vegetation becomes the prominent feature of the street scene.

The proposed landscaping scheme reflects this transition and a leafy frontage is proposed with renewed hedgerow and tree planting.

4.2. Landscaping

The proposed landscaping scheme is dominated by native species hedgerow with some tree planting. This is both consistent with the local landscape and will serve to enhance biodiversity.

4.3. Separation between dwellings

Dwellings within the locality have varied separation distances with a mix of smaller and larger gaps. The more generous separation distances are reflected in the proposal both in the relationship between units and between neighbouring properties.

4.4. Impact on neighbouring properties

There are no overlooking first-floor windows facing Oakfield House and Logrunner to the West and East. Rooflights on the West elevation facing the side elevation of Oakfield House provide high level natural light to the bathrooms.

5. Access

The existing site access point to Swain Road is retained and an additional access is proposed to the East of the site.

There will be low impact on vehicle movements to and from the site. The proposed new access has previously been assessed by KCC Highways for applications PA/2025/0577 (14 April 2025) and PA/2025/1924 (30 October 2025) and no objections were raised subject to standard conditions.

Adequate parking areas are to be provided on site and the parking and turning areas are reduced to the minimum necessary.

6. Conclusion

The proposed scheme responds appropriately to the qualities of the existing context, reflecting its informal arrangement and enhancing the setback from the street. Overall, an attractive landscaped frontage has been proposed.

The scale of the proposal is modest and appropriate in relation to the neighbouring properties and the varied design integrates well with the mix of building styles in the locality.

Appendix:

DHA Planning Statement

Fairlight, Swain Road, Tenterden, TN30 6PD

Final Report 34887 March 2025

*Previously submitted in relation to the same site under application reference
PA/2025/0577*

Fairlight, Swain Road,
Tenterden, TN30 6PD

Planning Statement

Final Report

34887

March 2025



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1 INTRODUCTION

1.1 PURPOSE OF THIS STATEMENT

1.1.1 This Planning Statement has been prepared by DHA Planning on behalf Vernacular Homes Ltd, in respect of a Full Planning Application for the demolition of the existing dwelling and associated outbuildings and the subsequent erection of four dwellings at Fairlight, Swain Road, Tenterden, TN30 6PD.

1.1.2 The application is therefore described as such:

'Demolition of Fairlight and the erection of 4no. dwellings with private amenity alongside associated landscaping, parking and access'

1.1.3 This Statement provides an overview of the Site and proposals, its context and the relevant planning history. It also provides a review of all applicable Development Plan Policies, the National Planning Policy Framework (NPPF), and other relevant planning guidance.

1.1.4 This Statement should be read in conjunction with the other documents and plans submitted as part of this Application by Vernacular Homes Ltd.

2 SITE AND SURROUNDINGS

2.1 THE APPLICATION SITE

- 2.1.1 The application site (hereafter 'the Site') is located within the administrative boundaries of Ashford Borough Council (hereafter 'the Council', or 'ABC'). The Site comprises Fairlight, a detached one-storey property alongside associated garaging, outbuildings, hardstanding, and private amenity. The Site is approximately 0.14 hectares in size and is accessed via Swain Road to the north.
- 2.1.2 The Site is situated within the urban area of St Michaels, Tenterden and is bound by residential development on all sides, with further residential development beyond this. To the east, south and west, the Site is bound by detached houses and associated private amenity gardens, to the north, the Site is bound by Swain Road with a series of semi-detached dwellings beyond this.



FIGURE 2.1: APPROXIMATE SITE LOCATION EDGED IN RED (GOOGLE EARTH)

2.2 PLANNING DESIGNATIONS

- 2.2.1 According to Ashford Borough Council's online planning proposals map, the Site lies within the settlement confines of St Michaels, Tenterden. The Site is otherwise not the subject of any site-specific allocations nor designations and therefore is considered as 'white land' in planning terms. Notwithstanding this, it is highlighted that a number of trees covered by Tree Preservation Orders (TPOs) are present to the east and south of the Site boundaries. A dead tree with a TPO falls within the Site (Reference: TPO No.21 1988),

- 2.2.2 According to Historic England’s Listed Building Map Search, there are no nearby Listed Buildings or Heritage Assets that are within the setting of the development. In this regard, the St Michael’s Conservation Area is approximately 200 metres to the south west, although as a result of this distance and the intervening built form, it is noted that the Site is not within the setting of this Conservation Area.
- 2.2.3 The Environment Agency’s flood risk maps identify the Site as being entirely within Flood Zone 1, meaning it is at the lowest risk of flooding. In addition to this it is noted that the Site is at a very low risk of surface water flooding. It is however noted that the Environment Agency mapping demonstrates that is a medium to high chance of flood water spreading to the southern extent of the Site.

2.3 ACCESSIBILITY

- 2.3.1 The Site is located to the north of Tenterden, a village within the Borough of Ashford, approximately 12 miles from Ashford itself. Tenterden is the second-largest settlement in the Borough.
- 2.3.2 The Site is approximately one mile from Tenterden High Street, where a wide range of shops and essential services are easily accessible. More specifically, the Site falls within St Michaels, a well-served settlement forming part of Tenterden. The Site is less than a five-minute walk from various amenities along Ashford Road, including a petrol station, local convenience store, playground, place of worship, public house, primary school and good transport connections.
- 2.3.3 Two bus stops are within the vicinity of the Site, with the closest falling approximately 300 metres west of the Site. Bus Stop ID: ‘kntawpmp’ provides services to central Tenterden and Ashford. Alternatively, a second bus stop (ID: ‘kntawtgj’) lies approximately 65 metres north west and provides a connection to Maidstone.
- 2.3.4 The Wealden Cycle Trail, a 42-mile route from Ashford to Tunbridge Wells, runs along the northern boundary of the Site. Additionally, the Site benefits from its proximity to public footpath AB8 (Code: 0266/AB8/1) to the northeast, which terminates at Swain Road before continuing as public footpath AB9 (Code: 0266/AB9/3).



FIGURE 2.2: PUBLIC RIGHTS OF WAY MAP (KENT COUNTY COUNCIL)

2.4 PLANNING HISTORY

- 2.4.1 According to the Council's online planning application database, the Site has not been the subject of any previous planning applications.
- 2.4.2 Notwithstanding this, Planning Permission was granted in June 2013 (Reference: 13/00034/AS), immediately to the south and east Site boundaries, which sought the demolition of a bungalow and the erection of four detached dwellings. In the determination of this Application, it was established that increasing the density and scale of built form was acceptable.

3 PROPOSED DEVELOPMENT

3.1 OVERVIEW

3.1.1 Full Planning Permission is sought for the demolition of the existing dwelling, (i.e., Fairlight), and the subsequent re-development of the Site to provide 4no. dwellings, alongside associated car parking, hardstanding, and landscaping.

3.1.2 The layout and design of the development creates four two-storey dwellings which is split into two blocks of two semi-detached dwellings, which take a broadly square shape. Each dwelling is in line with and exceeds the Nationally Described Space Standards (NDSS) as shown in the Table 3.1 below.

PLOT	DWELLING TYPE	INDICATIVE FOOTPRINT (GIA) (M ²)	NDSS REQUIREMENTS (M ²)
Plots 1 - 4	Three-bedroom-four-person-two-storey	93.7	84

TABLE 3.1: INDICATIVE FOOTPRINTS OF DWELLINGS

3.1.3 The common areas of the site will be finished with a combination of both vegetation and hardstanding, with existing vegetation retained where feasible. These measures will help increase the ecological value of the Site and support biodiversity. Both hard and soft landscaping elements will be incorporated into the design of the individual plots as well as the wider site.

3.1.4 Plots 1 and 2 are offset slightly further south than Plots 3 and 4, which assists in avoiding any potential overlooking between the properties, ensuring privacy for future residents. The properties being offset assists in breaking down the massing of the four dwellings, whilst also providing appropriate space for turning.

3.1.5 The site will retain the existing primary access from Swain Road which will continue to serve Plots 1 and 2, it is proposed that a new secondary access point be introduced to serve Plots 3 and 4.

3.1.6 It is envisaged that the Plots will feature identical internal floorspace and layouts, which will be mirrored between Plots 1 and 2, and Plots 3 and 4, the dwellings will be accessed from the principle elevation (i.e., the north western elevation). From the main access a hallway and the stair core can be reached, from here access is provided to the kitchen / dining room, living room, built-in storage, and under-stairs toilet. The kitchen / dining room feature a bay window which further increases the floor area of the room, the living room is provided with French doors which open out into the private amenity space. The three bedrooms are accessed from the stairwell, with the main bedroom featuring large built in storage and ensuite. A main bathroom and two single bedrooms, with one featuring built in storage are also accessible from the first floor.

3.1.7 The proposed dwellings will feature identical elevational treatments and architectural style, the design seeks to emulate the materials seen in existing buildings within the immediate proximity of the Site (i.e., stock brick, clay tile roofing, white finished openings, and black rainwater goods), the proposed material approach seeks to particularly complement neighbouring properties to

the east. The roof takes the form of a half-hipped arrangement, with the openings on the side elevations.

- 3.1.8 Each Plot benefits from two allocated parking spaces within the curtilage of each dwelling. As per the above, Plots 1 and 2 will share a communal driveway and turning area served by the existing access, with Plots 3 and 4 having a communal driveway and turning area served by the proposed access. Plots 1 and 4 feature allocated parking to the front of each dwelling, which reduces the amount of area given to amenity space at the front elevation, however, both of these Plots benefit from larger rear amenity spaces. Plots 2 and 3 benefit from well sized front amenity areas and subsequently feature reduced private amenity gardens.
- 3.1.9 Each plot benefits from private amenity spaces located at the rear, which are appropriately sized and laid to lawn, providing each home with a comfortable outdoor area. The amenity spaces are provided with cycle and refuse stores with ease access to the front of each Plot via the side access, in addition to being provided with a patio. The retained trees are integrated into the landscaping to enhance the site's ecological and biodiversity value. The trees will also offer visual screening and softening, helping to maintain privacy between the new development and surrounding properties. Plot 1 is positioned further from the site boundary, with a larger garden to ensure a more sensitive transition to the neighbouring property.
- 3.1.10 It is additionally highlighted that full details of the proposed dwellings are included within the submission of the Application, including the submitted Plans and Design and Access Statement.

4 PLANNING POLICY FRAMEWORK

4.1 OVERVIEW

- 4.1.1 Under the provisions of Section 38(6) of the Planning and Compulsory Purchase Act 2004, applications for planning permission are required to be determined in accordance with the provisions of the Development Plan in force, unless material considerations indicate otherwise.
- 4.1.2 This Section sets out the relevant Policies of the statutory Development Plan and refers to any other material considerations that should be taken into account in determining this Application.
- 4.1.3 Other material consideration of relevance to the determination of this application includes the National Planning Policy Framework (NPPF) and several supplementary planning documents and guidance adopted at a local level.
- 4.1.4 Rather than rehearsing policies, this Section highlights relevant Policies applicable to the Application at hand, Policies are then explored in further detail within the below Section.
- 4.1.5 In this case, the following documents are relevant to the Application:
- The Ashford Local Plan 2030 (2019);
 - Tenterden Neighbourhood Plan (October 2024); and
 - The National Planning Policy Framework (December 2024).

4.2 ASHFORD LOCAL PLAN 2030

- 4.2.1 The Ashford Borough Council Local Plan 2030, adopted in February 2019, establishes the planning policies and guidance to ensure local development is built in accordance with the principles of sustainable development.
- 4.2.2 The following Policies within the Local Plan are deemed relevant to the proposed development:
- **Policy SP1:** Strategic Objectives;
 - **Policy SP2:** The Strategic Approach to Housing Delivery;
 - **Policy SP6:** Promoting High Quality Design;
 - **Policy HOU3a:** Residential Windfall Development Within Settlements;
 - **Policy HOU10:** Development of Residential Gardens;
 - **Policy HOU12:** Residential Space Standards (Internal);
 - **Policy HOU14:** Accessibility Standards;
 - **Policy HOU15:** Private External Open Space;
 - **Policy EMP6:** Promotion of Fibre to the Premises (FTTP);
 - **Policy TRA3(a):** Parking Standards for Residential Development;
 - **Policy TRA5:** Planning for Pedestrians;
 - **Policy TRA6:** Provision for Cycling;

- **Policy TRA7:** The Road Network and Development;
- **Policy ENV1:** Biodiversity;
- **Policy ENV3a:** Landscape Character and Design;
- **Policy ENV7:** Water Efficiency;
- **Policy ENV8:** Water Quality, Supply and Treatment; and
- **Policy ENV9:** Sustainable Drainage.

4.3 TENTERDEN NEIGHBOURHOOD PLAN 2013 – 2030

- 4.3.1 The Tenterden Neighbourhood Plan 2013 – 2020 was 'made' in October 2024.
- 4.3.2 The following Policies within the Neighbourhood Plan are deemed relevant to the proposed development:
- **Policy TEN NP3:** Conserve and Enhance Biodiversity;
 - **Policy TEN NP4:** Design and New Development and Conservation; and
 - **Policy TEN NP16:** Public Rights of Way.

4.4 NATIONAL PLANNING POLICY

National Planning Policy Framework (NPPF), Updated December 2024

- 4.4.1 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. Those sections of the NPPF which are relevant to the determination of this Application include:
- **Section 2:** Achieving Sustainable Development;
 - **Section 4:** Decision Making;
 - **Section 5:** Delivering a Sufficient Supply of Homes;
 - **Section 8:** Promoting Healthy and Safe Communities;
 - **Section 11:** Making Effective Use of Land;
 - **Section 12:** Achieving Well-Designed Places; and
 - **Section 15:** Conserving and Enhancing the Natural Environment.

Planning Practice Guidance

- 4.4.2 The Planning Practice Guidance (PPG) builds on principles within the NPPF and provides further detailed technical guidance, with reference to relevant legislation and other guidance. The PPG is a 'living document' and is constantly being updated / reviewed.
- 4.4.3 As well as providing technical guidance the PPG sets out the importance of good design. It advocates the need for quality of design which it considers is an integral part of achieving the fundamental objective of sustainable development. The relevant sections of the PPG are listed below:
- Biodiversity Net Gain;
 - Design: Process and Tools;

- Effective Use of Land;
- Healthy and Safe Communities;
- Housing: Optional Technical Standards;
- Housing Supply and Delivery; and
- Natural Environment.

The National Model Design Code

- 4.4.4 The purpose of the National Model Design Code is to provide detailed guidance on the production of design codes, guides and Policies to promote successful design. It expands on the ten characteristics of good design set out in the National Design Guide, which reflects the Government's priorities and provides a common overarching framework for design.
- 4.4.5 It is based on the key characteristics of context, movement, nature, built form, identity, public space, and use. Other sections dealing with homes and buildings, resources and lifespan provide important considerations in achieving design quality and should be used to inform the content of Local Plans, design codes or guides depending on local circumstances.

4.5 OTHER MATERIAL CONSIDERATIONS

Kent Design Guide (2005)

- 4.5.1 The Kent Design Guide sets out detailed principles for guiding the design of development. The Guide aims to assist designers and others to achieve high standards of design and construction by promoting a common approach to the main principles, which underlie Local Planning Authorities' criteria for assessing Planning Applications. It also seeks to ensure that the best of Kent's places remain to enrich the environment for future generations.

Residential Parking SPD (2010)

- 4.5.2 The Residential Parking and Design Guidance (SPD) was adopted by the council in October 2010. This SPD brings together 'good practice' on the design of residential parking. It is tailored to the development scenarios likely to be faced in the differing contexts across the borough.

Sustainable Drainage SPD (2010)

- 4.5.3 The Sustainable Drainage SPD (SuDS) was adopted by the council in October 2010. The SPD sets out how developers can meet the requirement of Local Plan 2030 Policy ENV9. Guidance is provided on the provision of sustainable drainage systems for the disposal of surface water and rainwater, so that it is retained either on-site or within the immediate area.

Residential Space and Layout SPD (2011)

- 4.5.4 The Residential Space and Layout (SPD) was adopted in October 2011, setting out in detail the council's minimum standards for living space and layout for both privately and publicly funded residential developments.

Fibre to the Premises SPD (2020)

- 4.5.5 The SPD provides further guidance on LP Policy EMP6 "Fibre to Premises" (FTTP) to enable its delivery in new developments.

Climate Change Guidance for Development Management (2023)

- 4.5.6 The Climate Change Guidance for Development Management SPD was adopted in December 2022 and states that all applications for residential dwellings are required to provide a Climate Change Mitigation Statement.

Five Year Housing Land Supply

- 4.5.7 National Planning Policy Framework (NPPF) Paragraph 78 is clear that Local Planning Authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing for decision making purposes.
- 4.5.8 The published Housing Land Supply Position for the Council, as of April 2024 (published September 2024) sets out a 4.39 years' supply of housing, taking into account a 5% buffer applied to housing provision. In this regard, the Housing Delivery Test (HDT) 2023 results were published in December 2024, demonstrating that over the last three years (2020 - 21, 2021 - 22, 2022 - 23), the Council has achieved a delivery rate of 117% when compared to the required number of houses over this period.
- 4.5.9 As a result of the Council's Local Plan being out-of-date, and the Council being unable to demonstrate a five-year housing land supply, it is highlighted that the 'tilted balance' now applies.
- 4.5.10 Notwithstanding this position, where opportunities exist to deliver new homes in sustainable locations such as previously developed sites within settlements, these should be appropriately maximised. Further given the primitive status of the Emerging Local Plan, it is vital that the Development Management system intervenes to take a permissive stance to development and deliver the homes that are urgently needed in the short term.

5 PLANNING CONSIDERATIONS

5.1 INTRODUCTION

- 5.1.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, it is necessary to consider whether the application proposal accords with the statutory development plan and if not, whether any material considerations indicate, that planning permission should nevertheless be granted.
- 5.1.2 In determining whether the proposal accords with the development plan, the following planning policy considerations are assessed in this section in relation to the proposal:
- (1) The Principle of Development;
 - (2) Design, Layout, and Scale;
 - (3) Amenity;
 - (4) Landscaping, Trees, Ecology, and Biodiversity Net Gain;
 - (5) Highways, Parking, and Access; and
 - (6) Flooding and Drainage.

5.2 THE PRINCIPLE OF DEVELOPMENT

- 5.2.1 Policy SP2 of the Local Plan sets out that housing targets will be met through suitable windfall proposals that reflect the accessibility of the settlement, infrastructure provision and the level of services available.
- 5.2.2 In this instance, the Site falls within settlement boundaries within the urban confines of Tenterden. In this regard, Policy HOU3a confirms that residential development is acceptable within this area provided it integrates satisfactorily with the existing settlement.
- 5.2.3 In response to Policy HOU3a, the erection of four dwellings of modest scale is entirely proportionate to this area of Tenterden and is in keeping with the pattern and grain of development within Swain Road. Notwithstanding this, it is noted that the principle of development is firmly established and has already been confirmed in the neighbouring Application (Reference: 13/00034/AS), which recognised that the site lies within the settlement confines, where there was no objection to the principle of the proposed residential use. In this context, the compliance of the proposals with HOU3a is set out below:
- a) It is of a layout, design and appearance that is appropriate to and is compatible with the character and density of the surrounding area;***
- 5.2.4 The proposed layout, design and appearance are appropriate and compatible with the character and density of the surrounding area. The layout has been carefully considered to respect the scale of the plot while optimising the site's potential to

contribute to the Borough's housing land supply. The four dwellings comply with the relevant internal and external space standards, ensuring high-quality accommodation.

- 5.2.5 Whilst matters such as design, layout, and appearance are detailed in the subsequent Sections, it is important to highlight that the development has been sensitively designed to integrate with its residential surroundings. The scale is appropriate for the area, and the materials selected reflect a contemporary approach while respecting the local Kentish vernacular. The proposed dwellings directly responds to the density and character of the surrounding residential built form.

b) It would not create a significant adverse impact on the amenity of existing residents;

- 5.2.6 The proposed development ensures a positive relationship between the new and existing built fabric and will not lead to overlooking or overshadowing of neighbouring properties. The Site boundaries benefit from existing vegetation screening along the eastern and southern boundary, which will be retained to ensure privacy and minimise visual impacts. Additionally, the layout of the Site seeks to ensure that the proposed dwellings do not directly overlook surrounding dwellings, which ensures the development respects residential amenity and maintains appropriate separation distances. In particular, Plots 1 and 4 do not feature windows within bedrooms along the side elevations to ensure appropriate levels of amenity are retained, indeed the only windows at first floor to feature on the side elevation comprise the bathroom window which will be obscure glazed.

c) It would not result in significant harm to or the loss of public or private land that contributes positively to the local character of the area (including residential gardens);

- 5.2.7 The proposed development will not result in the harm or loss of any public or private land that contributes positively to the character of the area. In accordance with Policy HOU10, development involving the complete or partial redevelopment of residential garden land is permitted, provided it complies with the Council's external space standards as set out in Policy HOU15. In this regard, the proposals therefore fully comply with the standards of Policy HOU15 and subsequently HOU10.

- 5.2.8 Notwithstanding this, it is noted that the loss of private residential garden land will not give rise to significant harms, in particular to the character of the area. Indeed, the proposals seek to rearrange this garden land to provide 4no. private gardens in addition to providing planting to the front of the Site which will positively contribute to the character of the Site.

d) It would not result in significant harm to the landscape, heritage assets or biodiversity interests;

- 5.2.9 Whilst the Site is not located within any designated landscape or in proximity to a Heritage Asset, considerations of ensuring the proposals complement the local character have been integral to the design. Biodiversity interests have been a key consideration. Existing trees on-site will be retained where possible, and the layout has been carefully designed to ensure a Biodiversity Net Gain.

e) It is able to be safely accessed from the local road network and the traffic generated can be accommodated on the local and wider road network;

5.2.10 The Site is safely accessible from the local road network, as noted in Section 5.6 of this Statement. In this instance, the proposals are modest in scale (i.e. provision of four dwellings) and can comfortably be accommodated on the local road network.

5.2.11 Notwithstanding this, the development supports the Local Plan's guidance for sustainable locations which encourage active travel, by virtue of the Site benefiting from its proximity to established Public Rights of Way and cycle route bordering the north, ensuring safe and adequate movement to and from the Site. Notwithstanding this, the Site is in close proximity to day-to-day services and facilities including transport nodes.

f) It does not need substantial infrastructure or other facilities to support it, or otherwise proposes measures to improve or upgrade such infrastructure;

5.2.12 The Site is located within a settlement and comprises an existing dwelling. In this instance, it is not envisaged that substantial infrastructure or additional facilities will be required to support the development by virtue of the modest scale of the proposals in addition to the existing utilities that currently serve the Site.

g) It is capable of having safe lighting and pedestrian access provided without a significant impact on neighbours or on the integrity of the street scene; and,

5.2.13 The proposal is for residential development within a residential area, and as such, safe lighting will be maintained for all Plots, ensuring no significant impact on neighbours or the integrity of the street scene.

5.2.14 Existing pedestrian access via Swain Road will be maintained, ensuring continuity with the established access patterns of neighbouring properties and preventing any adverse impacts. The proposals will not result in an increase of off-Site lighting and it is noted that the existing pedestrian routes currently benefit from sporadic street lighting.

h) It would not displace an active use such as employment, leisure or community facility, unless meeting the requirements of other policies in this Plan.

5.2.15 The development is located in a predominantly residential area and currently comprises an existing residential dwelling. No employment, leisure or community facility will be displaced as a result of the proposal. Accordingly, the development complies fully with this Policy criterion.

5.2.16 In light of the above context, it is highlighted that the principle of development is firmly established via Local Policy. The proposal presents an opportunity to optimise an underutilised plot of partly previously developed land, sustainably situated within walking distance of a range of day-to-day facilities and services in line with the adopted approach to windfall development.

- 5.2.17 Turning to wider material considerations, Paragraph 11 of the NPPF establishes that plans and decisions should apply a presumption in favour of sustainable development, for decision-making this means that applications that accord with an up-to-date development plan should be approved without delay.
- 5.2.18 Further to this, NPPF Paragraph 73 continues to identify that small and medium-sized sites can make an important contribution in meeting the housing requirements of an area and are often built-out relatively quickly. To promote the development of a good mix of sites, Planning Authorities should,
- "Support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes". (Emphasis added)*
- 5.2.19 In this regard, the Site lies within the built-up area of Tenterden and is sustainably located, benefiting from easy access to local transport nodes, shops, services, facilities, and employment opportunities. NPPF Paragraph 129 further highlights that planning decisions should support development that makes efficient use of land, which is supported by the proposal which seeks to ensure that developments make the most efficient use of land in addition to locating development on previously developed within built-up areas.
- 5.2.20 Footnote 8 to NPPF Paragraph 11 is also clear that Policies for the supply of housing cannot be considered up to date if the Local Planning Authority are unable to show a robust supply of housing land. In this regard, the Council are currently unable to demonstrate a five year supply, and therefore existing Policies relating to the supply of housing cannot be considered up to date.
- 5.2.21 In this instance, the 'presumption in favour of sustainable development' as set out within Paragraph 11d of the NPPF applies, meaning that a 'tilted balance' is applied in favour of granting Planning Permission. In this regard, it is noted that there are no areas of particular importance (as defined by Footnote 7) which would provide a clear reason for refusing development. Additionally, any perceived adverse impacts would not significantly and demonstrably outweigh the tangible benefits of the development, in particular, the provision of additional housing is a sustainable location on a parcel of land that partly comprises previously developed land which are significant indeed, and the adverse impacts are very limited, if any.
- 5.2.22 By virtue of the proposals having no tangible harm, the principle of development is considered wholly acceptable. Overall, the proposed development of the Site for additional housing should be given 'great weight' in the determination of this Application (in accordance with NPPF Paragraph 73(d)). Moreover, the development will make a modest positive contribution to the supply of new homes within the Borough. Notwithstanding the Council being unable to demonstrate a 5-year housing land supply, it is noted that in the context of the Government's objective to significantly boost the supply of housing, the Council's annualised housing target is only a minimum figure. It should not therefore represent a cap that would restrict additional delivery of high-quality sustainable homes in this location that can further benefit the Council's housing supply.
- 5.2.23 Based on the above Assessment, it is considered that the proposed development entirely accords with the Development Plan and relevant National Planning Policies and therefore should be approved without delay.

5.3 DESIGN, LAYOUT AND SCALE

- 5.3.1 Local Plan Policy SP6 requires that all development proposals demonstrate high-quality design. This design must carefully consider and positively respond to key criteria, including character, distinctiveness, and sense of place; ease of movement; legibility; mixed use and diversity; public safety and crime prevention; the quality of public spaces and their future management; flexibility and liveability; richness in detail; and the efficient use of natural resources.
- 5.3.2 This is supported by Section 12 of the NPPF, particularly Paragraph 131, which emphasises the creation of high-quality, beautiful, and sustainable buildings and places. It highlights that good design is essential for sustainable development and plays a vital role in creating better places to live and work.
- 5.3.3 The proposed development has been carefully designed, taking into account the context of the existing site, its position within a residential area, and the surrounding vernacular. The design aims to retain the suburban feel while introducing four dwellings that efficiently utilise the site's large, previously developed plot, which had not met its potential.
- 5.3.4 Particular attention has been given to Policy TEN NP4 of the Tenterden Neighbourhood Plan, which covers the design of new development and conservation. The relevant guidance for this site includes:
- a) Is designed to a high quality which responds to the heritage and distinctive character of the individual area in which it is located by way of:*
 - i. height, scale, density, layout, orientation, design and materials of buildings,*
 - ii. boundary treatment,*
 - iii. the scale, design and materials of the public realm (highways, footways, open space and landscape);*
- 5.3.5 In this regard, the proposed dwelling have been designed to align with the surrounding vernacular, emulating the architectural style and material finish of nearby residential properties (particularly those along Swain Road and Heather Drive). The existing properties feature traditional architectural style and Kentish vernacular materials, in this instance. In this instance, the proposals are high-quality insofar as they respond to the material character (i.e., stock brick, clay tile, and white framed windows) in the immediate area. The proposals are of a similar height, scale, and density to that of other surrounding two storey dwellings along Swain Road and Heather Drive. The orientation of the development, like that of surrounding properties seeks to address the adjacent road (i.e., Swain Road).
- 5.3.6 Each dwelling is oriented to front the access road, in keeping with the pattern of neighbouring properties, providing frontage parking and private amenity spaces, with private gardens to the rear. The design uses efficient, modern materials that not only enhance the aesthetic of the development but also contribute to sustainability and energy efficiency.

5.3.7 The proposed boundary treatments will complement the overall design, maintaining a clear distinction between public and private spaces while integrating well with the surrounding streetscape. Indeed, fencing comprises the individual plot boundaries, with additional landscape planting proposed to the north of the Site to assist with improving the public realm tied to the Site.

b) Protects and sensitively incorporates natural features such as trees, hedges and ponds within the site

5.3.8 The proposed development includes a high-quality landscaping scheme that prioritises the retention of existing trees, hedgerows, and other natural features within the site boundaries. The proposals have sought to retain and enhance as much of the existing vegetation as possible, with the design carefully integrating them into the overall layout. This approach enhances the natural character of the site while contributing positively to the surrounding environment.

5.3.9 As noted previously, the dwellings have been designed to ensure that their internal spaces are entirely fit for purpose, with all dwelling benefiting from a number of window openings at both ground and first floor, in addition to featuring seamless access to private amenity spaces. All dwellings meet and exceed the minimum requirements as set out under the Nationally Described Space Standards in addition to being provided with adequate internal storage, recycling storage space, and access to ample useable private amenity space. Indeed, the gardens are south-east facing and are expected to benefit from appropriate levels of sunlight throughout the day.

5.3.10 Overall, the proposals make efficient use of an underutilised, partially previously developed parcel of land within the urban area of Tenterden, St Michaels and provide a dwellings that directly respond to and emulate their surroundings. Localised visual interest is created through a more contemporary roof stylisation, which combined with the high-quality nature of the proposals, results in a net enhancement over the existing situation. In light of this, the design of the dwellings entirely complies with Local Plan Policy SP6, and Neighbourhood Plan Policy TEN NP4 with regard to design, layout, and scale.

5.4 AMENITY

5.4.1 Local Plan Policy HOU3a supports residential windfall development within settlements such as Tenterden, provided it does not result in significant harm to the amenity of existing residents. This aligns with Paragraph 135 of the National Planning Policy Framework (NPPF), which requires developments to create safe, inclusive, and accessible places that provide a high standard of amenity for both existing and future occupants.

5.4.2 It is highlighted that the immediate surrounding area of the Site is residential, as a result of the dwellings located on Swain Road, Ox Lane, and Heather Drive. In view of this and the above Policy context, it is noted that the design and siting of the proposed dwellings has been carefully considered to respect the amenity of both existing and future occupiers. The layout, scale, and height of the development have been carefully considered to ensure that appropriate separation distances are provided between the development and neighbouring properties. Like that of the existing buildings, windows are proposed on all elevations, however, the first floor side elevation windows will feature obscure glazing. By

virtue of the vegetated Site boundaries and the proposed Plot boundary fencing, it is not considered that any of the ground floor windows would give rise to any amenity concerns.

- 5.4.3 The orientation of the development has been carefully considered to ensure that the proposals are located more centrally within the Site, to assist in reducing opportunities for overlooking between neighbouring properties. With regard to separation distances, it is highlighted that from the northern most elevation there is in excess of 34 metres between the development and dwellings on the opposite site of Swain Road. With regard to the rear elevation, it is noted that the development is approximately 28 metres away from the rear elevation of the closest lived in building located on Ox Lane. With regard to the side elevations, it is noted that the western elevation is approximately 6 metres from the garage of the nearest dwelling on Swain Road, although this extends to approximately 10.5 metres to the dwelling itself. In this regard, the proposals are offset from this dwelling and are not provided with any windows that overlook the property. The eastern elevation is approximately 13.5 metres from the nearest dwelling located along Ox Lane, however, similar to the western elevation, the proposals are offset and not provided with any windows that overlook this property. In light of the above context, it is noted that the distance provided at the side elevations of the proposals are substantially higher than a number of other properties in the immediate area.
- 5.4.4 In light of the above, it is therefore concluded that by virtue of the scale and use of the proposed development, in combination with the distance of the proposals to the nearest buildings, the development is entirely appropriate in regard to amenity. Indeed, the Site is well screened and will benefit from additional planting that will ensure more than adequate amenity levels will be retained for both future and neighbouring occupants.

5.5 LANDSCAPING, TREES, ECOLOGY, AND BIODIVERSITY NET GAIN

Landscaping

- 5.5.1 As part of the proposed development, a high-quality landscaping scheme has been designed, as illustrated on the Proposed Landscape Plan (reference: PLO7 Proposed Landscape Plan), prepared by Vernacular Homes. The landscaping plan proposed high levels of tree, vegetation, and shrub planting, in addition to boundary hedgerows and species rich grassland in public areas. This scheme incorporates the findings and recommendations from the submitted ecological and arboricultural assessments.

Trees

- 5.5.2 The Tree Survey and Arboricultural Impact Assessment (AIA) have been prepared in support of the proposed development (GRS Arboricultural Consultant Ltd, March 2025). The Assessment considers the impact of the development on the existing tree stock, specifically trees protected by Tree Preservation Order (TPO) 21/1988.
- 5.5.3 The tree survey identified a total of nine individual trees, one tree group, and three sections of hedgerows on the site. Of these, two trees (T6 and T7), one

hedgerow (H12), it is envisaged that H13 will be removed to facilitate the proposed development, which will subsequently be replaced. T7, which is part of the TPO, is dead and requires removal for health and safety reasons.

- 5.5.4 The proposed new driveway for Plots 3 and 4 will encroach into the Root Protection Area (RPA) of T2, which is off-site and part of the TPO. To mitigate any impact on the tree, above-ground soil surfacing will be used in this area to avoid soil compaction.
- 5.5.5 In accordance with the Arboricultural Impact Assessment, the proposed development will ensure minimal disruption to the surrounding trees. Despite the removal of some low-quality trees, the majority of the trees on-site will be retained, and their RPAs will be protected during construction. The development layout and tree protection measures have been designed to ensure that retained trees continue to thrive and contribute positively to the landscape.
- 5.5.6 Tree protection measures have been outlined in the Tree Protection Plan (TPP), which ensures the safeguarding of trees during demolition and construction. Any necessary pruning or tree works will be carried out according to BS 3998:2010. In areas where incursions into the RPAs of retained trees are unavoidable, such as the driveway, low-impact solutions will be implemented to preserve the trees' health and minimise disturbance.
- 5.5.7 The overall conclusion of the Tree Survey and Arboricultural Impact Assessment is that the development can proceed without causing significant harm to the local tree stock. The majority of the trees will be retained, and appropriate protective measures will be in place to minimise the impact on the environment. Therefore, the development is in compliance with relevant Local and National Planning Policies regarding the protection of trees and the promotion of good arboricultural practices.

Ecology

- 5.5.8 A Preliminary Ecological Appraisal (PEA) produced by Marsh Environmental Ecological Consultants (March 2025) accompanies this application. This PEA is additionally supported by a Daytime Bat Assessment Survey.
- 5.5.9 The PEA confirms that the existing dwelling has no potential for roosting bats, with the existing species poor hedgerow provides some limited nesting bird habitat. The Appraisal further notes that there was no evidence of badger activity on Site, in addition to the Site having unsuitable habitat for otter, water vole, and common / hazel dormouse. The PEA highlights that it is unlikely that deer or shrews would be on Site, however, it notes that there is some suitable habitat for hedgehog and other mammals.
- 5.5.10 The PEA includes a suite of mitigation measures, with further recommendations made to meet compliance with current legislation. Recommendations include compliance with laws protecting active bird nests, precautionary and best practices measures for safe removal of reptiles and amphibians, and prevention of cruelty to mammals. Other measures are recommended in line with compliance with statutory BNG requirements, alongside the NPPF and British Standards.

- 5.5.11 The PEA further notes generic biodiversity enhancements that could be taken forward by the development wherever possible to contribute towards the requirements of the NPPF which encourages incorporation of biodiversity in and around developments.

Biodiversity Net Gain (BNG)

- 5.5.12 For developments in England, Biodiversity Net Gain (BNG) became mandatory from 12th February 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). As a result of this, developers must deliver a BNG of 10%, ensuring the development will result in more or better quality natural habitat than there was prior to the development.
- 5.5.13 As a result of this, a Biodiversity Net Gain (BNG) Plan and Metric have been prepared and submitted as part of the application. The BNG Metric provides an assessment and calculation of biodiversity units pre- and post-development.
- 5.5.14 In view of the above, it is considered that the development as proposed is entirely in accordance with all relevant National and Local Policy relating to landscaping, trees, ecology, and Biodiversity Net Gain.

5.6 HIGHWAYS, PARKING, AND ACCESS

- 5.6.1 The access to Plots 1 and 2 is proposed to remain unchanged from the existing arrangements, a new access from Swain Road is proposed to Plots 3 and 4. Owing to the slow speed nature of Swain Road (i.e., being restricted to 30 mph), alongside the low number of movements generated by the development it is envisaged that the proposed access from Swain Road will be entirely satisfactory.
- 5.6.2 By virtue of the scale of the development (i.e., net gain of 3no. dwelling) it is not expected that the proposals would generate significant additional vehicle trips and therefore the development would not demonstrably impact on Local Highway capacity, or operation, nor would it have any severe impact on the Local Highway Network in line with Paragraph 116.
- 5.6.3 As highlighted above, two private parking spaces for each Plot will be provided in close proximity to each dwelling, ensuring convenient and sufficient on-site parking for future occupants.

5.7 FLOODING AND DRAINAGE

- 5.7.1 As previously highlighted, according to the Environment Agency's Flood Risk Mapping, the Site is entirely located within Flood Zone 1 and is therefore at the lowest risk of flooding, additionally, the Site has a very low risk of surface water flooding. It is however noted that the Environment Agency mapping demonstrates that is a medium to high chance of flood water spreading to the southern extent of the Site.
- 5.7.2 Given the development proposed comprises the redevelopment of the existing buildings on Site combined with the Site being approximately 0.14 hectares, it is not considered that the Application is required to be supported by a Flood Risk

and Drainage Assessment. Notwithstanding this, it is highlighted that an appropriately worded Condition could be attached to any grant of Planning Permission to ensure the details of the finalised drainage strategy are appropriate.

6 SUMMARY AND CONCLUSION

6.1 SUMMARY

- 6.1.1 This Statement has been prepared on behalf of Vernacular Homes Ltd in respect of a Full Planning Application for the demolition of the existing dwelling and associated outbuildings and the subsequent erection of four dwellings at Fairlight, Swain Road, Tenterden, TN30 6PD.
- 6.1.2 The Site is situated within the built confines of Tenterden (i.e., within settlement confines) and whilst the Site is not specifically designated, nor is it the subject of any planning constraints, careful consideration has been given to the design approach to ensure the development would not result in any adverse impacts on neighbouring properties or the character of the area.
- 6.1.3 Additionally, the development will make sustainable re-use of a sustainably located parcel of land that partly comprises previously developed land replacing the existing dwelling that is of no architectural merit within an area that is characterised by residential development.
- 6.1.4 This Statement has demonstrated that the development of 4no. dwellings is entirely in character within the wider area, in addition to this, it is considered that the redevelopment of sustainably located previously developed sites within urban areas is consistent with both Local and National Policies. The proposed development is modest in scale and complements the character of the surrounding residential properties, in addition to this, the development is located in a non-intrusive location.
- 6.1.5 Furthermore, the Council are unable to demonstrate a five-year housing land supply and so the Council are required to apply the presumption in favour of sustainable development. In this regard, it is vital that the Development Management system intervenes to take a permissive stance to development and deliver the homes that are urgently needed in the short term.

6.2 CONCLUSION

- 6.2.1 In considering the above context, it is considered that the development comprises a well-informed, high-quality, sensitive, and well-planned re-development proposal. The proposed development entirely accords with the Development Plan, and additionally, wider, material considerations support the proposed development. It is therefore respectfully requested that Planning Permission be granted.