

# THE PEMBURY SOCIETY

23 January 2023

## For the attention of Andrew McLachlan-Newens

Dear Sirs

22/03534/LAWPRO | Lawful Development Certificate: siting and ancillary use of a caravan within the curtilage of the dwellinghouse | 5 Lower Green Road Pembury Tunbridge Wells Kent TN2 4DZ

Even before considering the details of this application the Pembury Society have grave misgivings as to the suitability of this proposed structure in the garden of a Grade 2 listed dwelling in a Conservation Area. There are 3 listed dwellings in the vicinity of this proposed development and, because they are listed, they are not permitted to put up aerials and satellite dishes without approval, or solar panels and yet, apparently, it is quite in order to instal an enormous 2-bed fully equipped structure within the curtilage of one of them without formal planning approval. This cannot be right and is certainly unacceptable. We also believe that such a structure would be detrimental to a Conservation Area.

*'The applicant states that the mobile home will be used ancillary to the main dwelling, this is reinforced by the shared services, the scale of facilities contained within the mobile home and the fact the planning unit will remain as one.'*

This is a very disingenuous statement.

The dimensions given for the structure are 17.0 x 6.7 Mtrs (approx. 55ft x 22ft) which makes for a very spacious dwelling. However, this does not seem to include the porch area on the west side which, according to the scale, would add approximately another 2 metres to the width, which makes it wider than is permitted. Also, the internal height is given as 3.03 metres, but the roof is vaulted and the scale drawings give an indicative height of approximately 4.6 metres. This site is not flat and the proposed position for the structure would make it very intrusive to the residents in adjoining properties, particularly 5A and 9 Lower Green Road and those in Woodhill Park and The Green, Lower Green Road.

This may technically be classed as a temporary structure, or even a mobile home, but in practice, according to the publicly available plans, it is a complete 2 bed residential unit with all the comforts one would expect in a new build. The planning application refers to this dwelling as a mobile home, but the common perception of a mobile home is a structure that has wheels that enable it to be moved on and off its place of residence easily on those wheels. This is not the case here. The use of a crane to get the structure on and off site

defies any description of it being mobile. Also, as it is so large is it really 'temporary' or even 'moveable'?

The plans include, apart from 2 bedrooms and a living room, 2 shower rooms and a kitchen with a utility area, therefore '*the scale of facilities contained within the mobile home*' are more than adequate for a comfortable and independent existence and there would be no need for the occupants to have any contact with the main house unless they wanted to. We do note, however, that although it would be easy to instal electricity from the main house there is no mention of any plumbing which would be more problematic. Either the structure is going to be properly plumbed to the mains, both in and out, or there will be a need for a chemical toilet at the very least. This latter we find hard to believe in this day and age but the structure is too far from the house for there to be no facilities at all. We now have a serious anomaly. If the structure is fully plumbed it will definitely not be temporary or moveable and if it is not plumbed then why is it so large with the plans showing shower rooms and a utility room?

Clearly, if it is to be considered for a Lawful Development Certificate as an ancillary to the main house it doesn't need to have sophisticated plumbing but nor does it need to be so large. However, if it is to have modern plumbing then it is just an ordinary 2-bed dwelling in but in a back garden, with no independent access, and we believe that proper planning permission is needed if this is to be allowed. We believe it is necessary for the applicant to submit detailed plans on the proposed connections, or otherwise, of all utilities before the application can be considered.

We also believe that the application should be considered by the TWBC Tree Protection department as there are trees on the site that have not been shown on any plans and, apart from anything else they could be damaged during the installation of both the structure itself or any other necessary works. Also, as the site is completely enclosed, apart from a narrow side access from the front of the house to the back garden, the Fire Services should be consulted for their opinion.

We then come to the practicalities of actually getting the structure on site and in position. The main house takes up the full width of the site and, as stated, the structure would have to be 'craned' in over the top of the existing, Grade 2 listed, house and then moved a considerable distance down the garden to the proposed site. This is no easy task. It is fraught with risks and would probably require closure of the north bound road alongside the Green which would be very disruptive, if not unacceptable, to local residents. Any closure would result in a detour of almost 2 miles for those residents immediately to the north of the site. However, we have been advised that the whole structure may be delivered as a flat-pack for assembly on site. If this is the case why has it not been mentioned in the documentation? This again begs the question 'What are the applicant's intentions?'

It appears to us that there are too many questions and too few answers within the application for a decision to be made. Therefore, the Pembury Society contend that this application for a Lawful Development Certificate should be denied.

Yours faithfully

Planning Officer,  
The Pembury Society