

**Wrotham**

**9 November 2015**

**TM/15/03051/FL**

Wrotham, Ightham And  
Stansted

Proposal: Demolition of the existing housing to be replaced with new residential flats and houses, with associated ancillary buildings, parking and amenity space: 5 apartment blocks 2-3 storeys in height consisting of 9 X 1 bed and 43 X 2 bed units; 6 X 2 bed houses and 2 X 3 bed houses with private garden amenity space

Location: St Georges Court West Street Wrotham Sevenoaks Kent TN15 7DN

Applicant: Russet Homes Limited

---

**1. Description:**

- 1.1 This application relates to the redevelopment of a recently vacant sheltered housing development of 57 units of accommodation. All of the buildings are to be demolished and replaced by 60 units of housing accommodation in the form of 5 blocks of apartments and 2 terraces of 5 houses and 3 houses.
- 1.2 The Circle Housing Russet residents in the existing complex have been rehoused into suitable alternative accommodation in the last few years. This dedicated decant process has been in accordance with the Homes & Communities Agency's (HCA) requirements and undertaken in conjunction with the Council's housing service. This process included the statutory requirement to offer a Home Loss & Disturbance Payment along with any reasonable expenses as a result of the move.
- 1.3 The 8 proposed houses are 2 storeys and will be in the NW corner of the site. The flatted blocks are sited as follows: Block 1 of 15 flats (2-3 storeys) is will be in the north central part of the site and Block 2 of 8 flats (2-3 storeys) in the NE corner. Blocks 3 of 8 flats (2-3 storeys), 4 (12 flats) and 5 (9 flats) (both 3 storeys) are all on the south site frontage with West Street.
- 1.4 The access will remain as existing, to West Street. This has a footway to the east leading towards the High Street- there is no footway on the western side of the access
- 1.5 The layout includes 74 parking spaces and 3 external and 3 internal bin stores, 2 external and 1 internal cycle stores, plus an area of external cycle stands totalling 50 communal spaces.
- 1.6 The 8 houses and 2 of the ground floor flats will have private gardens with cycle storage/sheds.

- 1.7 The application has been revised since originally submitted to respond to some of the representations made. The main changes are:
- Block 2 near to Courtyard Gardens will now have 2 x 1 bed flats in the roof space rather than 2 x 2 bed flats in a full second floor. This allows the eaves to drop from 8m to 6m (existing block here is 6.2m to the eaves) and the ridge to drop from 12m to 9.8m (existing block here is 8.4m to the ridge) and the reconfiguration of all second floor windows to face into the site (and not towards Courtyard Gardens) with the exception of 4 high level roof lights facing east.
  - Block 3 has the same accommodation but the ridge and eaves of the main gable have dropped by 0.6m. The eastern wing nearest Courtyard Gardens has dropped its eaves and ridge by 1.4m.
  - Block 5 will now have one of the 2-bed flats on the second floor become a 1 bed flat in the roof space. This allows the eaves and ridge of the western wing near Mountain Close to drop by 2m.
- 1.8 The materials palette is light red multi-stocks, or mid red smooth bricks; slate effect concrete tiles, grey/green artificial timber effect cladding to feature double height protruding rectangular “oriel” windows (also grey/green to match), dormers with metal PPC cladding, grey gutters and fascias. Feature gables are to have brick header courses to the parapet and some gables will have the feature of protruding brick courses.
- 1.9 The frontage hedge and trees are largely being retained with some removal/thinning to remove suppressed trees or those of less quality. Trees within the centre of the site are being removed to facilitate the buildings and parking but landscaping will include replacement trees. 2 trees are shown to be removed for a brick bin store on the eastern boundary but these are stated in the submitted tree report to be category C trees (an Acer and a cherry).
- 1.10 The applicants advise in their Design and Access Statement that some of the existing dwellings have been hard to let due to their aged design and there have been long term voids. They state that the existing dwellings would require considerable investment to bring them up to modern day standards. They argue that the opportunity presents itself to undertake the redevelopment of the site to provide high quality, purpose built homes to high standards of design and thermal efficiency.
- 1.11 They have provided a Transport Statement which concludes that:
- a parking stress survey has been carried out on the roads in proximity to the site in order to assess the current levels of parking demand in the area based on the overnight parking levels deemed to show the ‘peak’ parking demand

which is comfortably below the point where an area is deemed to suffer from high parking stress.

- There is an acceptable provision of parking for this development in accordance with the Council's policy expectations.
- The results of the worst case scenario PICADY assessment demonstrates that the High Street/West Street junction will continue to operate well within its maximum operating capacity in the AM and PM peak periods. No mitigation measures are considered to be necessary to offset the very minor increase in the use of this junction under the proposals.
- The roads and turning heads associated with the site will not be compromised by the new development, and will be in keeping with the existing arrangements for refuse collection in the local area.

1.12 Prior to formally submitting this planning application, Circle Housing Russet carried out its own extensive stakeholder engagement for a redevelopment scheme on the basis of several options, concluding the process with one based upon 100% affordable housing. However, at a later juncture when this application was submitted to TMBC, the applicants advised that wide ranging and significant fiscal changes from the July 2015 Budget relating to how Housing Associations are funded and the impact of the removal of HCA grant availability for Social and Affordable Rented provision had, unsurprisingly, given rise to a review of the proposals in relation to tenure. This resulted in a formally submitted tenure mix to include 29 affordable flats (12 flats of Affordable Rent, 17 flats for low cost home ownership) and 31 units for market sale (23 flats and 8 houses). Low cost home ownership in this case means Shared Ownership. The percentage mix was 48% affordable and 52% market housing. Within the affordable housing offered, the split was 41% Affordable Rent and 59% Shared Ownership.

1.13 Since the application has been submitted, there have been further national fiscal changes to how housing associations must operate along with far reaching welfare reforms and economic conditions have altered and it is understood that the applicants intend to amend the tenure mix further based on a Viability Assessment they have undertaken. It is expected that this change in tenure mix will be formally submitted as an amendment to the planning application in due course. Any change in tenure mix that does not comply with TMBC planning policy would need to be accompanied by a Viability Assessment which would be subject to an independent appraisal.

## **2. Reason for reporting to Committee:**

2.1 The scheme has generated a significant number of local objections.

## **3. The Site:**

- 3.1 The site lies in the confines of the Rural Service Centre of Wrotham. The site and Wrotham as whole is washed over by the AONB. Wrotham Conservation Area is beyond the Courtyard Gardens development to the east.
- 3.2 The site lies over a Water Gathering Area.
- 3.3 The site measures 0.94 ha and is comprised of 2 storey buildings in use as 57 dwellings: 26 x 1-bed sheltered bedsits and a mix of 31 flats – 21 x 1-bed, 9 x 2-bed and 1 x 3-bed. The built form is concentrated in the centre of the site with extensive grass banks, trees and hedges at the periphery. There are currently 28 parking spaces.
- 3.4 The land is generally upwards sloping SE to NW – the SE corner is approx. 128.3m OD rising to approx. 132.3m in the NE corner- a rise of 4m over a distance of 80m – ie 1 in 20. The SW corner is approx. 130m, ie rising 1.7 m over 116m, ie 1 in 68. The NW corner is the highest at 134.2m but that is at the top of a steep bank- generally the land is 132.3m in the NW corner of the site.
- 3.5 There are mature trees mainly on the southern frontage to West Street and on the western boundary to Mountain Close and Goodworth Road. There are more individual and small trees on the rest of the site. The boundary to Courtyard Gardens comprises a 1.6m high concrete panel wall in front of a well-maintained hedge belonging to Courtyard Gardens that currently screens much of the existing buildings from the shared amenity area serving those neighbouring properties.
- 3.6 To the east are over 55's dwellings at Courtyard Gardens and dwellings and garage courts of 111-116 West Street: ground levels are similar to the application site along the common boundary. There is hedge approx. 4m high belonging to Courtyard Gardens along much of the western boundary.
- 3.7 To the north is a boundary of concrete panel fencing with bungalows of Childs Way set at levels 133.3m to 132.7m OD. On average, these bungalows have ground levels 1.2m higher than the ground level of the application site, which is dug down in the NE corner. There is almost a full Leylandii hedge along that boundary in the gardens of Childs Way, screening most of the gardens of these neighbouring bungalows. Beyond the bungalows are conventional 2 storey houses in Childs Way, which are on rising land.
- 3.8 To the south beyond West Street itself are pairs of semi-detached houses. These are generally 24m from the edge of the site but at a lower land level. Some have hardstandings for parking in their frontages.

#### **4. Planning History (relevant):**

TM/74/11677/OLD  
MK/4/73/847

Local Government  
Review Transfer

1 April 1974

Planning papers transferred to file TM/74/86 on 1/4/74.  
Proposed wardens scheme comprising 45 flats

TM/74/12780/OLD No Objection 5 December 1974  
TM/74/86,,  
Proposed wardens Scheme comprising 45 flats.  
(previous application MK/4/73/847)

TM/76/11067/FUL No Objection 30 April 1976  
TM/75/1100,,  
Warden scheme comprising of 35 no. 1 person flatlets, 9 no. 2 person flatlets, 4 no. 2 person bungalows, wardens house and communal facilities.

TM/77/10525/FUL grant with conditions 5 October 1977  
(TM/77/816)  
Wardens Scheme of 17 one person flatlets, 9 two person flatlets, and one five person house, common room, laundry, 23 two person, 9 three person flats.

TM/96/01451/FL Grant With Conditions 19 November 1996

installation of new lift and shaft in existing boiler room with new lean-to boiler room extension and pump room

TM09/00255/FL / Grant With Conditions 20 May 2009

Conversion of existing wardens house into 2 no. residential flats

## 5. Consultees:

5.1 KCC (Heritage): No response

5.2 PROW: No response

5.3 KCC (SuDS)- a sustainable drainage scheme for surface water is necessary due to the increase in hard surfacing

5.4 EA: no comment

5.5 Southern Water: Initial investigations indicate that the developer will need to provide additional local infrastructure for wastewater sewerage system and a drainage conditions will be necessary for both surface water and foul sewerage to be approved in consultation with sewerage undertaker.

5.6 Kent Police: Concern that the applicant has not included crime prevention or applied the seven attributes of CPTED in their DAS and no communication re other issues including a formal application for BREEAM and Secured By Design (SBD) if appropriate. The Design Initiative (KDI) will assist with Crime Prevention and Community Safety. A meeting with the applicant/agent to discuss Crime

Prevention and update with new documentation for crime prevention. Lack of contact may have an effect the development with regards to CPTED Secure By Design (SBD) and BREEAM with impact for the future services and duties of the Community Safety Unit (CSU) and local policing.

5.6.1 However, a planning condition should ensure that Crime Prevention is addressed effectively. The use of a condition will address both our statutory duties under Section 17 of the Crime and Disorder Act 1998 and will show a clear audit trail for Design for Crime Prevention and Community Safety.

5.7 DL: This is a net gain of 3 dwellings and hence the open space policy OS3 of the MDE DPD is not triggered.

5.8 Waste: Bin locations 1-4 have been agreed and if the plan is followed there should be no problems. Each property will be issued with 2 wheelie bins and a green recycling box.

5.9 KCC (Developer Contributions): no objection and will not be pursuing any education or other obligations with regard to this application. KCC Social Care have requested 1 Wheelchair Accessible Home be delivered as part of this affordable housing scheme. KCC would also request a Condition be included for the provision of Superfast Fibre Optic Broadband.

5.10 KCC (H&T): Car parking is proposed largely in accordance with the standard for a suburban edge/village/rural environment as designated in IGN3, with a shortfall of 3 spaces (74 instead of 77). Desirable to provide 77 spaces if possible at the expense of some landscaping and/or maybe a cycle store where my perception is that the cycle parking standard is rarely taken up fully.

5.10.1 The applicant's consultant has demonstrated that the development traffic without discounting the previous over 55's use will not have a material impact on the operation of the adjoining highway network as measured by industry standards and in the context of current planning policies. The Transport Study has also reviewed crash records and there is no particular crash history that has the potential to be exacerbated by this development. No objection to this proposal but conditions relating to the following are recommended should approval be given:-

- construction vehicle loading/unloading and turning facilities
- parking facilities for site personnel and visitors.
- prevent the discharge of surface water onto the highway.
- wheel washing facilities
- provision and permanent retention of the vehicle parking spaces

- provision and permanent retention of the vehicle loading/unloading and turning facilities

5.10.2 It may be advisable to require a construction traffic management plan for approval prior to commencement, designed to maximise safety and minimise disruption during this period.

5.11 Kent Downs AONB: The redevelopment offers the opportunity to improve the standard of development, particularly in view of the increase height and density of the proposed buildings and there should be an improved palette of materials to raise the quality of the development here and make it more appropriate to the AONB. Of particular concern are the dark grey slate effect concrete tiles: these do not successfully emulate natural slate and clay tiles are the predominant roofing material and is it recommended that clay tiles are used, Care will also be needed in brick selection. Replacement trees should be included to break up the extensive areas of hard surfacing for car parking. The revisions do not address any of the concerns

5.12 PC: original comments (summarised)

- The priority occupants of the site in future are elderly people in socially rented stock. This has been the main use of the site for over 35 years and the need for it remains due to ongoing requirements and a dearth of alternative such accommodation in the area.
- The ideal arrangement would be for the renewal of the existing fabric with improved facilities. The conversion of bedsits to one-bedroom flats could be achieved by reconfiguration, with a small loss of overall number of units. Reuse would be the preferred sustainable development.
- Wrotham has a large proportion of socially rented accommodation: the applicant should be responsible for providing social facilities like a hall as a communal meeting place.
- The scheme is fundamentally an over-development of the site. Buildings on the southern frontage of the site are proposed too close to the trees alongside West Street. There would be pressure for lopping or felling them. A greater setback would avoid this and allow more light into properties in summer when the trees are in leaf.
- Removal of attractive mature trees for a cycle store and car parking on the west side of the site demonstrate the pressures from over-development.
- The development has a massive, institutional character quite unsuited to this village: three storeys; high, steeply pitched roofs with gables.

- There is an over-powering mass closer to West Street than the existing building and new buildings on the eastern side would tower over Courtyard Gardens with an overall adverse effect on neighbours to the north and east.
- Nowhere for children (and their supervisors) to play (other than in the few private gardens).
- Car parking arrangement would amount to a significant loss of character.
- Permanent shade will make much of the scheme a more melancholy place.
- Will generate a need for more car parking than the number of spaces to be provided. Kent County Council's guidance is likely to understate car ownership and parking space requirements. If 93 spaces are likely to be needed, but only 74 provided, there would be significant overspill of parking requirements into surrounding streets (mainly West Street) and would exacerbate existing on-street parking there, impede traffic flow, create highway safety problems and impair local amenities.
- Should be a greater proportion of homes for elderly people who are much less likely to use cars, and reduce the over-development on the site.
- The design would be detrimental to the character of the settlement - fails to satisfy Policy CP24.
- Substantial loss of housing for people unable to afford market rents as only 29 dwellings would remain subsidised compared with 57 until now. The number of dwellings with affordable rents would be just 12 (compared with 31 until now). Very substantial loss of affordable housing, by an organisation whose fundamental reason for existence is to provide this kind of home. Instead of retaining support for vulnerable elderly people, the scheme proposes to meet the simpler needs of the affordable sector. Not acceptable on a site specifically provided originally to meet the needs of elderly people.
- St George's Court has been a highly significant sheltered housing facility and there is a lack of alternative schemes like this available in the locality, as indicated by Circle Housing Group's need to decant residents as far away as Snodland and Tonbridge. The large number of affordable dwellings in Wrotham generates an ongoing requirement for affordable sheltered housing for local residents in old age, to remain close to their families and friends in the village.
- Prior to the decanting, about 8 of the flats were unoccupied. No inherent lack of demand. Voids were the bedsit units due largely to the poor quality of the bedsits and the lack of investment in their renewal over the years. Almost all the dwellings with bedrooms were occupied.



- Residents who responded to the Circle Housing Group 'consultation' asked for refurbishment of the site rather than its demolition and rebuilding.
- The need for sheltered affordable housing in the Borough has recently been made clear in the Strategic Housing Market Assessment (SHMA): a 26% growth in the number of people over 55 in Tonbridge and Malling by 2021; with the over 65 population projected to grow by 59%.
- Given that the number of older people and single person households expected to increase, there will be a notable demand for affordable housing from the ageing population.
- The Borough Council should give special weight to proposals which increase affordable sheltered housing and strongly resist losses in this tenure.
- The Affordable Housing SPD of July 2008 concluded that demand for supported accommodation for older people was predominantly for independent accommodation with external support but will be kept under review.
- The scheme would introduce a large number of families with children of school age: inadequate school places in the village. The secondary school is also understood to be at capacity. An insufficiency of school places would impose difficulties on the education service, local transport and the households unable to secure school places locally.
- Contrary to Policy CP13: the scheme is not appropriate to the scale and character of the settlement: would generate significant additional trips, especially by car; there would be no significant improvement to the appearance, character and functioning of the settlement.
- Policy CP17: only 41% of the affordable homes would be social rented, not 70%. A dismal contribution to local housing need from reducing the supply of affordable housing and by reducing the proportion of the social rented tenure.
- Pedestrian movements would remain roughly the same in the peak hours but reduce throughout the day. However, the total number of person trips across all modes (car, pedestrian, cycling, bus and train) would increase by about 25%. Because of the lack of public transport in the locality, additional vehicular trips will be generated above estimated. Junction of West Street with High Street needs ameliorative measures to assist pedestrian and vehicular movements.
- The proposals should provide at least 77 car parking spaces but only 74 are proposed. 2011 Census data for car ownership in the area immediately surrounding the proposal site shows the proposals would generate a demand for 93 cars to park. The proposals would therefore lead to on street car parking

on adjoining residential streets to the detriment of highway safety and the amenities currently enjoyed by existing local residents.

5.13 PC: comments on revised plans and Transport Statemet (summarised)

- The State of the Nation's Housing study by the International Longevity Centre said that demand for retirement housing could outstrip supply by more than 375,000 homes by the middle of this century.
- Fails to comply with CP24: over-development and not appropriate to the scale and character of the settlement.
- There would be a deterioration to the appearance, character and functioning.
- would generate significant additional trips, especially by car, harming the safety of the area.
- Policy CP19 does not apply.
- The existing use is suitable because the proportion of supported elderly residents who drive cars is relatively low, so parking was accommodated within the site and there was no impact on local schools, which are all running at capacity. The proposed use adversely affects the sustainability of the rural location that would be more suitably accommodated in a rural service centre as required by the Local Plan.
- The proposed development would result in a substantial loss of housing for people unable to afford market rents by an organisation whose fundamental reason for existence is to provide this kind of home. Far from the development providing affordable housing, the applicant is selling this off.
- Instead of retaining support for vulnerable elderly people, the scheme proposes to meet the simpler needs of the affordable sector with a majority emphasis on shared ownership rather than affordable rent. Not acceptable on a site specifically provided originally to meet the needs of elderly people.
- Borough Green and Wrotham benefits from a large proportion of affordable housing and in particular the socially rented sector. This in turn generates considerable need for sheltered affordably rented accommodation for the elderly that has been satisfied by St George's Court. This is also evidenced by SHMA findings.
- Fails to meet the social housing requirements of the Local Plan. 8 empty properties were bedsits. A difficulty in renting them is entirely due to a lack of investment in the infrastructure. Needs reconfiguration of the bedsits into 1-bedroom flats and general refurbishment throughout including replacing

kitchens and bathrooms. More sustainable than demolition and rebuilding mixed use housing.

- Loses a very important Community Hall with kitchen for the greater elder community in Wrotham contrary to social element of sustainability as set out in paragraph 7 of the NPPF.
- Changes to rooflines are very minor changes to selected buildings, accompanied by marginal changes with no change to roof height, and creation of flat roofs with additional rectilinear protrusions. The steep angle rooflines remain high.
- Reduced impact of the proposals on Childs Way and on Courtyard Gardens is marginal: remains considerable loss of privacy to Courtyard Gardens and the massing of the proposal is barely altered, continues to constitute over-development.
- lack of public transport in the locality: it is highly likely that additional vehicular trips will be generated above those estimated in the TRICS analyses (six fold increase in vehicular traffic during both highway network peak periods and a fivefold increase throughout the day. Pedestrian movements would double and the total number of person trips across all modes (car, pedestrian, cycling, bus and train) would quadruple.
- A significant impact on the junction of West Street with High Street where visibility, particularly toward the south, is deficient.
- Large increase in pedestrian movements and lack of infrastructure to accommodate them. 2011 Local census data shows will be a demand for 93 cars to park, which exceeds the proposed 70 spaces, leading to car-parking on adjoining residential streets to the detriment of highway safety and the amenities currently enjoyed by existing local residents: overspill of 19 vehicles not 3, parking stress level of 98%.
- The site is not well served by public transport. Two services are commuter coach trips to central London, 2 are school bus services and route 228 provides one service per day. There are in fact 3 local bus services close to the site, one of those, route 222, provides only 5-8 services a day which only serve Wrotham Village at peak times.
- The overnight car parking survey overestimates street car-parking available. The total number of car-parking bays available should therefore be counted as 85 bays.
- Refuse vehicle is required to undertake very long unacceptable reversing manoeuvres, up to 70m long, egress tracking analysis clearly shows the refuse vehicle unacceptably overhanging and crossing footway and verge areas.

5.14 Borough Green PC: Wholly support the detailed objections submitted by Wrotham Parish Council and CPRE, and endorse them. Also object to the loss of this important local facility and its impact on the elderly in Borough Green. There is nowhere else locally that provides this important "halfway house" between normal family and village life, and accommodation in a full nursing home, and the area would be diminished greatly by its loss. Already ample social and market housing in Wrotham in particular, and the area in general, and any future are in the developing Local Plan, and the LDF it supersedes. But there are no proposals to replace this loss.

5.15 CPRE (Tonbridge & Malling district branch): summarised:

- 3 storey steeply pitched blocks are out of character
- incongruous material choice
- does not blend in with the surroundings
- loss of green areas and spacious feel
- little sunlight will penetrate
- overpowering to bungalows on Mountain Close and Courtyard Gardens
- overdominant- eg Block 2 is too massed within 12m of Courtyard Gardens
- urban form, unsympathetic the village character
- poor design
- should be 2.5 storeys and hipped roofs
- roof space will protrude above the historic roofline and be visible from St Georges Tower and long views of the village.
- The developer has not taken account of the AONB
- Insufficient social rented units are provided, contrary to Policy CP17.
- Wrotham has an ageing demographic and needs private supported elderly accommodation to support the extensive social housing in the area- eg Courtyard Gardens- this is shown in the TMBC's own SHMA.
- The ex-residents were dispersed to Snodland and Tonbridge- evidencing that there is a lack of alternate e accommodation in the village. They were happy at St Georges but decanted wide across West Kent to build predominantly private dwellings for the open market.

- Local primary and secondary schools are full
- This is major development, not complying with CP13 which allow minor redevelopment.
- The change in the types of dwellings will increase trip generation.
- Due to lack of local Post Office, GP, shopping and train station, this will increase traffic movements
- 77 spaces should be provided not 74 based on standards: it is more likely that 93 cars will be owned.
- On street parking will be detrimental to highway safety and amenities
- More car use of the junction West Street and High Street where there is a lack of footways, harming highway safety
- Damage to listed building at the narrowed junction West Street and High Street- vehicles have crashed here.
- Contrary to CP24 of the CS and SQ8 of the MDE DPD.
- Loss of community facilities used as a venue for meetings, medical services and social interaction. Contrary to paragraph 70 of the NPPF.
- Votes on the consultation document were ignored by Circle Homes
- The communal hall has a different use class and this has been ignored in the current application.
- There should be a refurbishment of the bedsits to improve cooking facilities and to separate the sleeping and living accommodation. The flats in the complex were never a problem to let
- Contrary to paragraph 7 for the NPPF- fails the social and environment role of sustainable development

5.15.2 Revisions do not overcome objections:  The overall form and massing of the blocks of flats, generally 3 storeys with steeply pitched roofs and high gable ends, results in an urban, almost industrial feel that would relate poorly with this historic village environment. The vertical styling of the architecture, close packed into a relatively small site is discordant with the rest of the rural village and within its AONB setting.

5.15.3 The chosen materials of a dark red brick combined with slate grey concrete tiles will add to the sombre atmosphere where little sunlight will penetrate. The height and massing has an overbearing and dominant relationship with surrounding

architecture which particularly affects West Street and Courtyard Gardens. In particular, the courtyard communal garden currently enjoys a pleasant open aspect to the west with trees above a low tiled roof. This will be replaced with successive tiers of austere flat blocks.

- 5.15.4 The amended development proposes habitable rooms to directly overlook the courtyard communal gardens, resulting in a loss of private amenity for all of the residents of the approximately 30 units within the Courtyard Gardens development.
- 5.15.5 All of the local schools are full which will result in considerable pressure on West Kent's education services and many more vehicle trips to take children to remote schools. The loss of trees and in particular the 9 in front of the West Street façade will degrade an important village asset. Parking is completely inadequate and will result in significant over spill of vehicles that will grid lock village streets.
- 5.15.6 The proposal results in significantly increased vehicle use combined with pavement parking to the detriment of highway and pedestrian safety. Wrotham is classified in the settlement hierarchy as a rural village due to its lack of facilities and services. The LPA's policy is to locate significant major development in rural service centres for reasons of sustainability. This application is completely contrary to those policies and the worst features of the application vindicates the LPA's preferred hierarchy.
- 5.15.7 The existing use does not impact schools or parking and generates very few vehicle trips. There is a significant need for 58 warden assisted socially rented elderly dwellings in this part of West Kent. Both Borough Green and Wrotham have significant populations of parishioners in socially rented accommodation and it is convenient to support their parents locally. This need is also evidenced by the LPA's SHMA.
- 5.15.8 The temporary loss of the community hall has had a pronounced impact on the remaining elderly populations in Mountains Close, Childs Way and Courtyard Gardens, hence 60 plus objections to this application. Permitting the application would result in a permanent loss to the detriment of the social needs of the surrounding elder community.
- 5.15.9 It would be perverse to allow the applicant, a registered social housing provider, to demolish 58 (including ex Warden's accommodation) much needed socially rented affordable homes for supported elderly, in order to build 60 dwellings and sell the majority on the open market in order to provide just 12 socially rented affordable homes.
- 5.16 Private Reps: (104/51R/0S/0X) and Major development site and press notice. Members are advised that 67 initial letters of consultation were sent on 23 and 30 November 2015 plus site and press notices displayed on 2 December 2015. However, it appears that an anonymous resident utilised the TMBC notification

letter, edited it to be a letter specifically seeking objections and posted it by hand to a wider area on Sunday 13 December 2015. This is the reason why a number of objectors have stated that the time to respond was inadequate, as they are not referring to bona fide TMBC notification letter.

5.16.1 Sixty Six letters of objection have been received (summarised):

- 600 people voted for a refurbishment but were ignored
- Distressed by the loss of the existing housing
- Wasteful to knock down this development and rebuild rather than refurbish
- The net loss of social rented is opposite to what Circle were created to do
- Inadequate publicity of the application and inadequate time to respond
- The project has changed from the original redevelopment for 100% affordable – the residents were coerced out under false pretences by force or money
- Density and height/form of roofline dominating and out of character, no building should be higher than any existing.
- Changes are tinkering at the edges. Look like Barracks blocks.
- Garages are needed so that cars do not get damaged in drive-by shootings
- Roofline will be 6.5m higher than Courtyard Gardens, overwhelming them.
- This will be more intrusive on the old part of Wrotham than the past additional developments.
- Change in age of occupants will affect the tranquillity of the area and lead to more anti-social behaviour by more adolescents living in a remote location.
- Overdevelopment more suited to London- doubling of built space and massive reduction in green space that will be at the sloping boundaries, unsuited for rest/play/recreation.
- Loss of wildlife
- Materials out of character
- The new houses will not meet the needs of Wrotham's elderly population  
Wrotham is not prioritised and 3 storeys will be unsuitable
- Inadequate proportion of social rented

- Ignores that the over 55 age group is expanding and needs sheltered housing to relived pressure on NHS beds
- Wrotham elderly downsizing will not be able to stay in Wrotham
- Circle are incorrect to stay there is no need for retirement housing in the area bearing in mind the high proportion of social housing here.
- More units should have disabled accessibility
- This is money grabbing, in breach of the covenant
- TMBC has not addressed the issue of the covenant being over riding. Improper and illegal to determine this application in advance of the Lands Tribunal hearing.
- There are other Circle housing in Wrotham older than the flats in St Georges but not improved
- Affect bats
- Inadequate infrastructure in Wrotham
- Local schools full so parents will need to drive the children to other schools
- Local GP is over subscribed
- Inadequate bus service, the residents will need to own and use cars, averaging 2 cars each.
- Road and junctions cannot cope with extra traffic, accidents at West Street junction involving several cars and at Battlefields
- Cars will park on pavements, blocking pedestrians with pushchairs, walking frames and wheelchairs
- West Street is full of parked cars at weekends
- This is not a cycle friendly area- the cycle stores will be for children's bikes only
- Inadequate parking- much is already on footpaths and Circle Russet are not interested in dealing with that problem.
- Pedestrian route is onto a section of West Street without pavements



- West Street already carries lots of traffic from the social housing as the other access is convoluted via Battlefields, also a narrow heavily parked road and leads to a T junction to a rural lane.
- School children will be affected by the danger of construction traffic
- This will remove green areas in an AONB
- Loss of communal hall leaves locals elderly isolated- Wrotham Church, the cricket pavilion and the Village hall are not accessible/safe/warm enough.
- Lack of play space for children and amenity space for the adults
- No crime prevention measures
- The subsoil may not cope with the is development
- Contrary to local plan where these sorts of development should be in larger settlements not smaller rural settlements like Wrotham
- Disruption/noise/dust/debris by the construction
- Damaged road surface from construction vehicles-
- Compensation needed in inconvenience.
- West Street residents affected by vibration and noise in construction period will need compensation
- Historic buildings could be damaged by vibrations from the demolition and construction
- The site workers must park on the site and no surrounding roads
- Block view of the Downs
- Overlooking,
- 8ft fences are needed for security
- Risk of motorcycles in the NE corner with consequent noise for neighbouring property.
- Refuse stores are too near the boundaries to houses adjacent. Unpleasant activities are banished to the periphery without a thought for the neighbours
- Harms outlook from Courtyard Gardens

- Premature /illegal to make a planning decision as Tribunal has not removed the covenant
- Bought our property in 2013 after being told there were no building plans. Will be overlooked and will seek compensation for property devaluation.
- Will harm views from the Downs and the Church.
- Drainage problems
- Aware of the Council's relationship with Circle but the Council should represent villagers and local council tax payers
- Will deter walkers as the village will lose its quaintness.
- People requiring affordable or social housing will require their own vehicles
- Reduction in rateable band.
- TA is wrong to say there are 3 cars between my drive access and my neighbours, and a total of 93 parking spaces along West Street. A ridiculous figure from drawing little rectangles on a piece of paper is not real life: all carried out by a company who are based in South London.
- Revisions have not addressed any of the concerns raised by the residents I don't see much point in me listing again all the concerns brought up before as you have not addressed them.
- Relying on parking outside all the residents of West Street houses, ( which are already taken)
- The amended plans for the redevelopment indicate only minor alterations make no practical attempt at responding to the very many serious criticisms levelled at the proposal. Does nothing to alleviate the oppressive and overbearing scale of the proposed structures when drawn up against the adjacent buildings in Courtyard Gardens. Will continue to dominate western skyline. Tenants in the new blocks will have a wonderful view of our gardens; we will have a vast expanse of apartment walls, windows and a steep roof to live with. The design, scale and density of the proposed development will totally overwhelm our homes and feature gardens.
- Comments made by CPRE Kent are fully endorsed
- We have three second-floor apartments that are directly affected by the loss of privacy from this redevelopment of St George's Court.

- The Design and Access Statement has a number of questionable statements made that fail to stand up to scrutiny. Urge TMBC to treat the entire document as suspect. Page 10 - a very misleading representation of the relative scale of the proposed buildings and the existing neighbouring homes. Nobody in Courtyard Gardens desires “court building/massing”. This high-rise building is a destructive mass impinging upon our privacy to our west. Far from being an opportunity to create, Circle and their designers are planning to destroy a secluded community area by introducing an overbearing and inappropriately considered block to our landscape and skyline. The new building is considerably closer to Courtyard Gardens.
- This redevelopment is in the wrong place, is inappropriately designed, will damage the neighbourhood and the entire village, is not what the parish needs and is definitely not wanted by the residents of Wrotham.

## **6. Determining Issues:**

- 6.1 This case is not put forward for determination at this meeting. There remain some outstanding issues concerning the viability of the proposal and the policy context that demand further detailed consideration. In the meantime there are some important locational characteristics to appreciate in terms of the approach to the redevelopment of the site. Although the scheme is essentially a redevelopment for residential use, the locational context and relationship to the surrounding area is important.
- 6.2 Members will also note that there are issues raised by objectors with regard to the impact on the amenities of neighbouring properties. The topography of the land within the site and boundary treatment and land levels relative to neighbouring dwellings are not readily discernible from the public highway or public vantage points.
- 6.3 There is also a reference in the objections to the impact on trees and again, this will need assessment based on the knowledge of land levels in situ.
- 6.4 In light of all of these considerations I am taking the step on this occasion of recommending that the Committee holds a Members’ Site Inspection in advance of the next meeting, so that Members can fully explore and appreciate such matters in their subsequent decision making.
- 6.5 I believe that in this particular case it would be helpful for Members to visit the site prior to the consideration of a full report at a subsequent Area 2 Planning Committee meeting. The full report will also set out the final proposal on tenure mix, the results of an independent appraisal thereon, final response to consultation and other determining issues.

## **7. Recommendation:**

7.1 A Members' Site Inspection **BE ARRANGED.**

Contact: Marion Geary