

SUPPLEMENTARY REPORTS

AREA 2 PLANNING COMMITTEE

DATED 1 April 2026

Wrotham

TM/25/01725/FL

Pilgrims With Ightham

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

Proposal: Section 73 application to vary condition 22 (approved plans) of planning permission TM/18/02268/FL (as amended by ref. TM/23/00661/NMA, TM/23/00915/NMA and TM/25/01464/NMA) for alterations to the approved scheme to comprise of the removal of one home, layout and elevation changes, internal layout changes and confirmation of the final affordable housing mix

During the application process, two comments were received from Wrotham Parish Council. These are published in full on the website and summarised as follows:

Response 1:

- No objection to alterations and removal of one dwelling.
- Strong objection to changes to tenure.
- Tower View Estate was built by TMBC for affordable social rental and was transferred to a local registered provider. Clarion Housing is the latest registered provider. Clarion owns most of the estate.
- Consider the estate has been the source of anti-social behaviour.
- WPC fund Tonbridge & Malling Anti-Social Behaviour Team Wardens.
- 'Wrotham Crime Diary' initiative is where volunteers collect crime reports, encourage police reports, and produce the Crime Diary every six weeks, raising ASB awareness.
- Advise that Clarion previously applied to amend the original consent due to "break in attempts and anti-social behaviour on the site....".
- Believe the consented tenure mix would produce a diverse and balanced community.
- Consider the proposed tenure mix, one of predominately affordable rental, is not a mixed and balanced community and contrary to NPPF.
- Believe the proposal will exacerbate ASB problems within Wrotham/will result in an unsafe environment.
- Proposal considered contrary to NPPF sustainable development.
- NPPF paragraphs 8b, 64, 66, 71, 96 quoted.
- TMBC Core Strategy considered out of date.
- Wrotham crime diary 1st – 28th February 2025 included.

Response 2:

- No objection to building alterations and removal of one dwelling.
- Strongly object to tenure changes and felling of 18 trees.
- Wrotham Village is historic and listed in the Domesday Book, with a 1970s infill social housing estate, Tower View. Estate constructed by TMBC as 100% affordable social-rental housing, then passed to a registered provider. Registered Providers changed many times, now Clarion. Right to Buy has reduced the number of such houses.
- St. George's Court was previously elderly housing. Residents were evicted. Planning application was refused and dismissed at appeal.
- WPC won a High Court case to uphold an over-55-year age covenant. Advise that WPC reached a deal with Clarion and ceased legal action regarding removal of age covenant, with the agreed tenure as per S106 agreement. Claim that Clarion have sought to ignore the deal.
- WPC considers this a viable site, believing Clarion wants to maximise revenue at expense of the local community.
- Claim Clarion's inability to control its tenant's behaviour is an issue, with the Tower View estate a source of anti-social behaviour.
- WPC fund Tonbridge & Malling ASB Team Wardens.
- 'Wrotham Crime Diary' initiative is where volunteers collect crime reports, encourage police reports, and produce the Crime Diary every six weeks, raising ASB awareness.
- Advise there are currently 151 Clarion-owned AR properties in Wrotham (23.7% of village), whilst AR tenure dwellings within the Borough is 15.4%, indicating Wrotham has a higher percentage of AR accommodation than the Borough average.
- Consider that the Wrotham Crime Diary shows most reported crime and ASB incidents occur along Pilgrims Way, West Street, and the three cul-de-sacs off West Street. Electric bike ASB is concentrated on a dog-walking field. Claim that high ASB areas indicate a correlation between ASB and some affordable rent tenants.
- Consider Wrotham's unbalanced tenure contributes to a high level of ASB.
- Quote Town and Country Planning Act regarding primacy - Core Strategy 18 years old, where policy conflicts with the NPPF, TMBC policies have little/no weight.
- Paragraph 8b and 96 of the NPPF quoted.
- Paragraph 64 of the NPPF interpreted "creating mixed and balanced communities".
- Consider that paragraph 64 of NPPF requires the LPA to consider the existing affordable rented dwellings in the locality, existing ASB and community needs to create a mixed and balanced community.
- Paragraph 66 of NPPF quoted – interpret that this requires the LPA to evaluate the local needs of the area.
- Consider proposal would be detrimental to social cohesion and would lead to a concentration of crime and ASB.
- Believe that the tenure has been decided without an analysis/assessment of local needs/the area.
- Claim Clarion stated there is an 'acute need' for affordable rental dwellings, but without justification.

- Explain that the higher proportions of affordable rent dwellings allow Clarion to access greater levels of government grant funding, but this is detrimental to community wellbeing and is not NPPF compliant.
- Advise that the application site is located within the National Landscape - TMBC has a duty to 'seek to further the natural beauty of the National Landscape' - tree loss contrary to this.
- State that 18 trees are to be felled, with loss of all central trees and question whether this is necessary. Trees a prominent feature, with such loss being detrimental, with resultant development visually unappealing.
- Request application is refused.
- Wrotham crime diaries November 1st 2025 – January 31st 2026, June 2nd 2025 – June 30th 2025, May 1st – June 16th 2025 included.

All of the issues raised above have been considered and addressed in the main committee report. Members should note that restrictive covenants are not material in the determination of a planning application and are a civil issue.

In addition to the above it is noted that there is a typographical error in paragraph 6.41 of the report. This paragraph should read as follows:

“The proposed development provides more than the 40% level of required affordable housing under Policy CP17, with the split of housing according with this policy (30% shared ownership and 70% affordable rented). The amended development therefore remains acceptable in regard to this policy.”