

Planning application consultation – 20/02299/FUL

Former Fawkham Manor Hospital

Manor Lane

Fawkham

DA3 8ND

Partial redevelopment and conversion of the former hospital for residential (C3 Use), including 12no. self-contained houses and 20no. apartments. Including demolition of modern hospital wings and outbuildings, associated landscaping, and erection of ancillary outbuildings.

Fawkham Parish Council is not against the principle of the re-development of Fawkham Manor Hospital nor the replacement of the hospital wings, however, we have various issues with the proposals presented which cause us to object to this planning application in its current form. These objections concern, in no particular order, the proposed design of the replacement buildings, car parking arrangements, traffic including vehicle movement modelling, access arrangements, number of units proposed and s106 and CIL contributions, each of which we will expand on below.

Listed Building Application

As you are aware, we applied to Historic England for the listing of Fawkham Manor in early August on the basis of its historic and architectural value: the association of Fawkham Manor with Edward Buckton Lamb demonstrates high historical value, and the building displays quality and originality in its design. We have been advised that this will take around three months to process. We ask that a decision on the planning application is not made until after the listing assessment process has been completed. In summary the application states that the house was designed in 1866 by E.B. Lamb, an eccentric Victorian architect of national importance, for himself. It displays many of Lamb's favoured elements, including an asymmetrical plan, projecting oriels, polychromy, dentilled string courses, dramatic chimneys, distinctive local materials (flint) and roof tiles in contrasting bands of colour - Lamb was one of the first architects to experiment with constructional polychromy. Some 26 buildings designed by Lamb have already been listed. Please see the attached document which gives full details of the listing application.

Please note that some of the information supplied by the planning agent in the Planning Statement regarding the history of the house is not accurate - see point 2.2.1: the estate did not belong to Lamb, rather he leased the site from the Hohler family who had purchased the estate. When Lamb became bankrupt, the Hohlers took over the house and lived there until 1949 when the estate was sold to the Billings family.

In the Planning Statement [1.1.5] it is stated that the building has "some" historic value, however, as shown above, FPC is of the view that the Manor House has a high historic value, both locally and nationally. There is a further comment [2.2.3] asserting that the building "would not reach the threshold for national importance": this is the view of the planning agent and we await Historic England's view.

Overview of the Fawkham Manor Estate

It will be useful to provide at this point an overview of the "Fawkham Manor Estate". This was part of a larger estate which covered most of the parish of Fawkham, purchased in the late 1800s, which remained largely intact until 1949 when it was sold to the Billings family. In this response, references to the "Fawkham Manor Estate" should be taken to be the

area bound by Manor Lane to the east which is accessed by two private roads, one of which is named "Fawkham Manor Farm". Some plots within this estate were sold in the 1960s and now form separate residences. Properties on the estate in addition to Fawkham Manor are understood to comprise: The Bungalow at Grange Park Farm, Lot 12, Oakwood House, The Coach House, Stables Cottage, 1 Stables Cottage, Parkwood, Park Field, The Spinney, The Cottage and North Lodge. The last three properties listed are at the northern entrance to the "Fawkham Manor Farm" access road and were not consulted as neighbours but clearly will be affected by the development via the use of the access road (see later for more on this).

In the immediate vicinity of the manor house is the accompanying stable block, which has been converted into three residences: The Coach House, Stables Cottages and 1 Stables Cottage. These are not mentioned in the Planning Statement [2.3.1] despite them being the nearest properties to the manor house.

FPC has sought the views of the residents on the estate, plus those living close by on Manor Lane, and these are reflected in our response below.

Reasons for Objection, in no particular order:

Design and Layout

We are pleased to see that the manor house itself remains largely unaltered and agree with the removal of the metal fire escape. We understand 8 apartments are proposed within the house itself, although the Planning Statement shows 12 [4.4.4] - is this incorrect?

However, our view is that the proposed design of blocks A, B and C is not in keeping with the design of the manor house and disagree with the assertion that the "new build is of a significantly higher architectural quality and greatly improves the current situation" for a number of reasons:

- The proposed mansard roofs have more visual bulk/mass in appearance than the current traditional roof on the hospital wings, despite the slight reduction in height.
- the dark grey colour of the mansard roofs does not sit well alongside the Manor House roof, which is of alternate bands of red and grey clay tiles (see attached photo). EB Lamb, the building's architect, was an early proponent of polychromy and we would like to see that reflected in the design of the new blocks, and feel that clay tiles would be more appropriate. The drawings submitted by the developers are misleading as they show the existing manor house roof as being dark grey.
- the proposed design does not include any bands of horizontal red brick, which are a striking feature of the manor house design, and, indeed, were included in the design of the hospital wings.
- the appearance of the proposed "flint style pebble dash" is uncertain and should be subject to a condition. It should be noted that the predominant building material of the Manor House is flint, rather than London brick.
- Block A does not look subservient to the manor house: it is too high, wider than the current building, and the plans show it moved forward from the current position of the

hospital wing, so that it carries forward beyond the line of the manor house frontage. Diagram 5.7 does not really show the scale/mass of block A as trees have been used to mask it.

- Block C will effect the views of Fawkham Manor from Manor Lane currently available via the old staff car park opening.

Given that Fawkham Manor is a heritage asset, a balanced judgement is required on the scale of harm or loss and the significance of the asset [NPPF para 197]. FPC feels the asset has high significance, with a listing application pending. We feel the proposed design and layout of the new Blocks will harm the setting of the manor house, contrary to policy EN4 of the Core Strategy, and further that the design is not aligned with SP7 or EN1 (a) of the Core Strategy, nor paragraph 127 (b) of the NPPF, and we would like to see it altered.

Car Parking

The plans include too few parking spaces, and a reduction to 71 from the existing 78. Although the proposals adhere to KCC's minimum vehicle parking standards, we ask that SDC exercises its right to depart from these to take account of special local circumstances and request significantly further parking, both for residents and for visitors/deliveries. There is no easy access to public transport (a bus stop some 1.3km+ away can only be accessed via PROWs across fields/woods) and so residents will be reliant on private cars. There is no "on street" parking available anywhere close to the site: Manor Lane is a single track road and the estate is served by single track private access roads. Any parking on these would block the route.

We feel that 4 bed townhouses, in the price bracket we expect these will fall, will have more than 2 cars per house. In addition, the "tandem" parking arrangement proposed is, we feel, likely to cause blockages and access problems for residents on this site and those elsewhere on the Fawkham Manor estate.

The parking arrangements are contrary to EN1 of the Core Strategy.

Access

The information provided by the applicants only contains information about two of the three access points to the Fawkham Manor Hospital site (as was):

1. The entrance to the old staff car park direct from Manor Lane - this is planned to be the car park for the 12 townhouses in blocks B and C. We would ask that the sight lines when exiting these be checked by KCC Highways.

2. The entrance close to Oakwood House, which we believe was primarily for hospital deliveries, which leads via a single track private road to the car parking to be used by residents in the apartments in the manor house and Block A.

There is a 3rd Northern access point, along Fawkham Manor Farm, a private access lane leading from an entrance point off Manor Lane by North Lodge. This was the main entry point for patients/visitors to the hospital. Again, it is single track. During consultation for the Local Plan for a different proposed development using this access, KCC Highways commented [DLPS6177] "Visibility may be an issue due to curve of road and established

hedges and trees. Vehicles entering and exiting the access southwards may be problematic due to the sharp alignment of the road to the access”.

It is not clear whether this will be used for access and, if not, how such access will be prevented. Given that Manor Lane is a single track lane with many bends, sunken sides and only a few informal passing places, the residents on the estate are concerned that the private estate roads will become used as an alternative to it.

The Access Statement says “access will continue as existing from Manor Lane and Fawkham Manor Farm” [7.1] and refers only to the first two access points above. We request some clarity on this point.

The Access Statement states that the nearest properties are located along Manor Lane - which ignores the properties on the estate itself, which are closer to the manor house.

We would ask that KCC Highways makes a site visit to assess the access.

Overall, we believe the arrangements are contrary to EN1 and EN2 of the ADMP.

Transport

To reach any services or facilities, future occupants would need to negotiate Manor Lane, a single track lane with steeply sunken sides, many bends and few informal passing places. It represents an unsafe walking environment due to the apparent speed of the traffic, absence of a footway and absence of lighting. Manor Lane is frequently covered with flints washed down from its steep sides, making walking unsafe, especially in the dark. For similar reasons cycling is unlikely to be desirable and would require a level of confidence, fitness and proficiency that future residents may not possess. It is therefore likely that future occupants would be car dependent, as are existing residents of Fawkham, as shown by a recent survey of Fawkham (January 2019): only 15.5% of respondents regularly walk as a form of transport and only one stated they regularly cycle, with only six (4.7%) cycling occasionally.

The Transport Statement suggests that people can use PROWs to reach services at New Ash Green, but the recent survey quoted above would suggest that is unlikely to happen in practice. The footpaths in the area reflect ancient settlement patterns and do not lead directly to New Ash Green Village Centre, which was built in 1967. It is unrealistic to think people will walk across fields along PROWs to reach a bus stop some 1.3km distant, to access a very limited bus service, which does not go to destinations such as Swanley, Dartford and Sevenoaks.

Manor Lane leads onto Valley Road at a blind bend where Valley Road is less than 4m wide. The Transport Statement acknowledges that the visibility splays at Manor Lane’s junctions are substandard [2.1.3] and it is our view that this junction could not be improved.

In terms of wider road network, Valley Road represents a quicker route from the M20/A20/M25/A2 than using an alternative route via the Ash Road and so it is our belief that most traffic movements to/from the site would use Valley Road. Valley Road is a narrow C-graded road in poor condition, liable to flood in a number of places, with several blind bends and subject to a 7.5T except for access restriction. KCC Highways has previously stated [DLPS7505] that “additional movements on Valley Rd and Fawkham Road ... would not be desirable”. It has also previously been noted that “access to major routes [from Fawkham] is not easy, due to the narrow rural nature of local roads, despite the relative

proximity of the motorway network” [SDC’s Conservation Area Appraisal for Baldwins Green, Fawkham].

We would question the results of the vehicle movement trip analysis undertaken, given that data was used for “edge of town” location - which this isolated, rural site is clearly not, and for “privately owned flats” - again not that comparable with the 4 bed townhouses and relatively large apartments proposed. A peak morning hour vehicle trip figure stated of 9 seems entirely unrealistic. The traffic movement patterns will differ from those of the hospital use, when movements were spread throughout the day, with more of an impact on the morning and evening peak times. We would like to see a more realistic analysis undertaken before we can comment further. We note that the consultation response from KCC Highways has flagged the data used as “unclear”. We would ask that KCC Highways makes a site visit to assess the access and undertakes a traffic analysis. As it stands, we feel the proposals are contrary to EN2 of the ADMP.

Number and type of units

In light of the above comments on parking, access and transport, we feel there are too many units proposed.

We understand 8 apartments are proposed within the manor house, although the Planning Statement shows 12 [4.4.4] - is this incorrect?

The Planning Statement suggests that the units, particularly the apartments, will be suitable for older households looking to downsize [4.3.14] and mentions they will contribute towards meeting an affordable housing need identified in the Local Housing Needs Survey conducted in the neighbouring parish of West Kingsdown [4.4.11]. However, an analysis of the needs identified shows only a minority are looking for smaller homes, of which several want bungalows, with others wanting some level of care provision, and West Kingsdown PC are in the process of providing 10 affordable and 3 market houses to help meet that need. We also feel there is a different market price in Fawkham compared to West Kingsdown which may mean the proposed apartments will not feasibly meet this need. The Local Housing Needs survey undertaken in Fawkham in 2017 showed no affordable housing need.

12 of the 32 units, over a third, are 4 bed townhouses which will not be suitable for downsizers and are contrary to SP5 of Sevenoaks Core Strategy, which is looking for smaller housing stock in the district.

In terms of footprint, should the current footprint used in calculations exclude buildings which are only entered to service equipment, for example, the plant room?

As the proposal is not to re-use the hospital wings, but rather to demolish and replace them, does Policy GB9 apply which is cited in the Planning Statement? However, GB9 (c) states “the replacement building would be within the same use as the building to be demolished”. The building being demolished was a hospital and the replacement building is residential.

S106

FPC does not object to the lack of affordable housing on site, as the last Local Housing Needs survey in 2017 did not show a need for affordable housing. However, we feel that a

s106 payment contribution equating to three houses elsewhere too small. We note that the NPPF says that where “vacant buildings are redeveloped, any affordable housing contribution should be reduced” however, it is only the Manor House itself that is being redeveloped, with 8 apartments, and the remaining 24 are being newly built. We therefore ask that SDC determine if the figure of three is correct.

CIL

We note that the applicants are seeking a large reduction in their CIL liability to take account the existing floor area which has been in lawful use. That use was as a hospital - does a change in use to residential affect this suggested reduction?

Clearly use as a hospital does not affect local community infrastructure in the same way as residential properties. The GP surgery is under particular pressure and has no capacity. The proposed 32 units represents an increase in housing stock for Fawkham of over 14%, which will have an impact on the local infrastructure which, we contend, should be liable for full CIL payment. As CIL Regulation 40 (as amended) is highly technical we rely on SDC to undertake the appropriate calculation.

We feel a development of this size should need to deliver improvements to infrastructure and, in addition to seeking to greatly reduce the CIL liability, no such improvements are being suggested by the applicants.

Bin Stores

Both of these are located some distance from the apartments/townshouses, which does not appear to be convenient for residents, which is also noted by the Recycling Officer. The store for the apartments is in fact closer to the Stables Cottages than to be apartments and need to be resited.

Ecology/Ancient Woodland

Should planning permission be granted, we would like to see the suggested new woodland, woodland management plans, enhancements, and protected species protection measures made conditions. The Ancient Woodland should be protected in line with statute.

Community engagement

As para 128 of the NPPF states, early engagement with the local community on design and style is important. However, FPC were contacted by the applicants only four working days before submission of the planning application, and we responded asking what plans they had to engage with the local community and offered our communication channels (website, Facebook Group) to help share their proposals; we have had no further contact from them.

We are aware a discussion with some of the estate residents took place but understand the developer advised that “the design would be in keeping with the manor house” and no detailed drawings etc were shared.

Valley Road: planning condition

Should permission be granted, FPC would wish to see a condition that no delivery/ construction traffic is to access the site via Valley Road (which would represent a quicker route from the M20/A20/M25/A2 than using an alternative route).

Fawkham Parish Council

10.9.20

ENDS