

25th February 2021

Dear Ms Karim,

**Re: Land at Fern Close, Frant, TN3
9DB**

**Application Reference:
WD/2020/2338/MFA**

Minor material amendment to application WD/2016/1519/MAJ. Variation of condition 32 in order to make alterations across the site including the re-siting and re-design of house nos. 8 & 9 to incorporate a partial basement.

I refer to our recent correspondence, and the recent Parish Council objection to the above application dated 3rd February 2021.

In response to this I have arranged with you to attend next weeks' planning meeting of Frant Parish Council, to discuss the proposals along with Philip Gowing, the owner/developer of the site.

Ahead of this meeting we would like to respond to the points made in the Parish Council's response to the application.

For ease of reference the Parish Council's comments are repeated below in bold italics and our response follows:

"The Parish Council objects to the proposed amendment. The Council considers that the amendment is material and that it cannot be construed as minor, given the scope of the redesign and the consequences of this."

The application has been validated as a minor material amendment and the case officer, Doug Moss, was involved in the validation process. As such, Wealden District Council (WDC) have



confirmed the application procedure applied for is valid and correct. Furthermore, the description of development remains consistent with WD/2016/1519/MAJ.

“The design has been altered such that the original intent of the scheme to be in keeping with the local style and vernacular (examples being the Abergavenny PH and houses fronting the A267), is now diminished. Inappropriate alterations, such as concertina doors, have been incorporated, altering the style and design to a significant degree. In addition, the garages are now not linked to individual properties – an important part of the original ethos of the scheme”

We consider that the original design concept incorporating the “gothic revival style” has been enhanced through the current application and is respectful to the surrounding character and appearance of Frant. We disagree with the statement that the original intent has been diminished as it is clear that the architectural detail remains as per the approved scheme, which draws references to the local vernacular through its window proportions, roof pitches and ornate bargeboards, for example.

The design rationale for the gap between plot 13 and its garage not being linked is to afford disability complaint access to No. 13 and No. 14 entrance doors. Improvements on this front have been made due to the previous design not being compliant to the disability access regulations, which also included the removal of ramped pathways which crossed over the site in multiple positions. The visual improvements and limiting retaining walls/hard surfaced pathways/ramps across the site has been agreed with building control, in addition to the new access arrangements to properties 13 and 14. As such there are overall accessibility improvements deemed to be made from the scheme which are considered to outweigh the loss of the garage link between properties.

With regards other design alterations such as the ‘concertina doors’ mentioned, we assume the reference relates to the rear lower ground floor doors to plots 8 & 9. These doors are only visible from the gardens of these properties and have not been incorporated anywhere else within the development. Given the fact that these features are not visible from surrounding views, and are only incorporated in two out of 15 units, we would argue that they are not inappropriate and overall, the original intent and design balance of this development is maintained.

“Other alterations are also considered to be a significant redesign, including the addition of a second floor to plot 8 and the inclusion of new basements to plots 8 and 9. The Council is very concerned about developing subterranean sections on the site given the propensity to flooding in this area and the incline of the site. In addition, it is noted that the site lies within an archaeological notification area and, with development at subterranean levels, the Council considers that the relevant authority now needs to be re-notified. The Council also considers the above alterations will be unsympathetic to the adjacent Conservation Area and will constitute over-development of the site. There appears to be little justification for the fundamental changes to the design or for the additional development at plots 8 and 9 and the Council believes that these changes undermine the way in which the



new houses will reflect the local vernacular in this highly visible and sensitive location”

Properties 8 & 9 have been redesigned to take advantage of their enclosed and relatively isolated position within the site without significantly altering the approved character and appearance of the buildings. Good visual containment of the rear of these properties can be achieved, due to proposed landscaping around the plot/site boundaries, and as such there is not considered to be any visual impact in heritage terms as a result of the changes proposed.

In real terms the partial basement redesign will be similar in terms of groundworks required to implement the previous design agreed under the non-material amendment application to WD/2016/1519MAJ (determined in January 2020) which included the lowering of the building ground level by 950mm. Furthermore, the levels to the west of properties 8 & 9 were regrettably not accurately reflected in the original or non-material amendment application elevations, which gave a misleading impression that the level difference to the west of 8 & 9 was not significant. Implementing the approved scheme would have required much consolidated ground to fill under the houses on plots 8 and 9 due to the sloping levels to this part of the site and rather than providing an unusable fill beneath the houses, usable accommodation has been incorporated which makes for a more efficient building and efficient use of the site overall. The new design also allows level access at lower ground floor to the rear gardens of units 8 & 9.

Commercially this redesign is also much more efficient – the previous design for units 8 & 9 would be expensive to build and with only 2 bedrooms (to unit 8), it would have been unlikely to generate sufficient value to cover the build costs. With the addition of the basement space for both properties and additional first floor to plot 8, the build costs will be compensated. Given their relative separation from the remainder of the site, orientation and large gardens, plots 8 & 9 are likely to be the most desirable properties to buy – therefore it was important to maximise their value and make more efficient use of the site.

It is not considered that the changes proposed to plots 8&9 will alter the approved surface water/SUDs drainage strategy considered under the original application and subsequent condition applications. In addition, Kent County Council Archaeology team have been consulted on the current application and have not objected to the minor alterations proposed in terms of partial basement areas being added – this should hopefully provide some reassurance that the works will not affect recognised heritage interests.

We trust that you will take the above points into consideration before the meeting next week.

If you have any queries in the meantime, please do not hesitate to contact KLW at any time.

Yours sincerely,



Louise Caney MRTPI
Kember Loudon Williams LLP
Associate



cc. Doug Moss, North Team Planning Manager

