<table>
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<tr>
<th>Name</th>
<th>Question: Please provide your comments on the Wildernesse Estate Design Statement here:</th>
<th>Response Id</th>
<th>Response Date</th>
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<tbody>
<tr>
<td>Paul Bakunowicz</td>
<td>Wildernesse design Statement comments: Having read the proposed WE design statement I do agree with most of their points and acknowledge that many of the points preserve the beauty of The Estate. However I have some objections are outlined below. My objections to the Design Statement: 1) KR01. The height of an extension should in my opinion be compared to the height of neighbouring properties not to the main house. This is especially true if the main houses height is quite low when compared to the roads average. 2) KR03. Arts and Crafts is a celebration of materials and craftsmanship and as such design today should embrace modern thinking and materials. With the caveat of blending in well with the landscape. 3) KR05. Similar to point KR03 the use of hanging tiles for example is outdated and not necessary as an expression of Arts and Crafts. Also having read through the latest &quot;SPAB Approach&quot; to conservation I note two sentences which encapsulate how we should think about conservation in todays modern world. 1) &quot;The SPAB approach generally rejects arguments that original design or cultural associations are more important than surviving fabric. For the Society, protecting fabric allows meaning and significance to be drawn from it by individuals, groups and successive generations.&quot; 2) &quot;The SPAB approach calls for an understanding of history, design and construction. Buildings are the product of decisions made at the time of their construction and in every era since. This sequence of change, and the relative importance of the elements that make up the whole,&quot; My further objections to the design statement are that there has been no consultation with the residents, who are the legitimate owners of the policy. The WRA board are our representatives not the policy makers. Such an important piece of work that will have a significant impact on all residents must be signed off by residents rather than it being imposed on them. My suggestion would be an anonymous vote and/or a portal where residents can leave anonymous feedback so they feel no peer pressure from the board to comply. The board is acting in the interests of the residents, but in order to do so holistically it must canvas residents honest and open opinions.</td>
<td>631005</td>
<td>30 Apr 2018</td>
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<td>A Cain</td>
<td>My main comment is that this Design Statement was not provided to all residents of the Wildernesse Estate prior to being submitted to the council. It certainly does not represent the views of all residents. Most likely it does not represent the views of a large majority of the residents.</td>
<td>616028</td>
<td>2 May 2018</td>
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<td>Duncan Rodgers</td>
<td>WRA and residents have not been consulted so this is not the representative view of the residents or association but a contrived attempt by a small number of individuals to subvert due process and impose will. This out of a point of governance should be completely rejected until appropriate consent and consult amongst association and residents is completed.</td>
<td>616031</td>
<td>2 May 2018</td>
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Dear Sir/Madam

Having read the design statement I tend to agree with most of the ideas set out however I feel it fails to take into consideration the changing environment around the Wildernesse Estate, that Wildernesse Estate is no longer in a rural landscape but in an urban landscape and that it fails to allow for adequate security planning for properties and residents. There must be some flexibility in creating boundary structures to your property and to allow for sufficient security apparatus to be deployed. I tend to agree that boundary structures and security apparatus should be discreet where possible but should not be specifically dictated or restrictive.

I agree that maintaining borders, verges, woodlands and hedges adds to the element of greenery and seclusion the original design intended and that this is something to be respected and preserved but within reason and residents should be allowed to manage hedges and woodlands to allow for light but retain privacy. This is something I think needs more clarity from Sevenoaks Planning.

Milana Aleksanyan

Hello,

Although the Design Statement is generally a reasonable document we strongly disagree with some Key Requirements and Objectives:

KRO9. We live at Wildernesse avenue where the majority of existing front gates are large metal gates, set between brick piers. The requirement to avoid this type of gates will massively discriminate residents who don't have such gates and plan to install them in a future. Besides, considering that half of Wildernesse Avenue is not lit at night, residents may not feel safe behind low level wooden gates. With crime level increasing in Sevenoaks area such requirement may undermine residents' safety and legal rights for self protection.

KRO10. The life is changing, trees are growing, houses are being refurbished. There may be plenty of reasons for the residents to alter driveways and entrances. WRA should not have an authority to ban driveway relocation/alteration on the private plots as long as it doesn't disturb neighbours.

KRO10. This is up to the Road Trustees and Residents to agree on the new/relocated/additional entrances. If such change makes sense why should we prohibit it forever?

Kind regards,

Milana Aleksanyan

[REDACTED]
I feel strongly that the Wildernesse Residents Association has an important role to play in the support of the residents in the area (of which I am one) but that there role should be primarily to ensure that the covenants that exist on the estate are protected and that certain building requirements are upheld, such as distance of property from the road. However, I do not believe that the architecture on the estate is defined by a particular era or style, such as arts and crafts, even though this is the dominant genre. Rather, the estate features properties of many different styles and is better for it. I do not believe that the WRA should act as "style police" and would suggest that many of the points put forward in their proposed design statement are, in any event, covered by planning regulations. I would rather see the WRA issue a non-binding set of guidelines, indeed they already exist, but for these not to have any statutory standing and nor for them to be embedded in planning policy.

Aleksanyan

Hello,

We generally agree with an idea to have a set of rules to preserve the unique status of Wildernesse estate. At the same time, there are lots of reasonable restrictions already in place due to the Conservation area status. Moreover, as we understand, WRA hasn't discussed this proposal with the wide range of residents and haven’t received their feedback, which is absolutely necessary before submitting such an important document to the Council. Although some of the proposed Key Requirements and Objections (KRO) make absolute sense to us we strongly disagree with the following restrictions.

KRO9 is unacceptable and should be removed. The style and materials of the entry gates aren't mentioned anywhere in the original Covenants. There are lots of metal gates already in place across the Estate. The proposal to install low level 5 bar wooden gates will significantly impact security and safety of the residents. It will also discriminate those residents who don’t have metal gates now, but plan to install them in the future.

KRO10 is unacceptable and should be removed. This restriction means that no one will be able to rebuild their houses in the future. It's impossible to build a new house without making changes to the existing driveway. In theory this requirement may prohibit any potential reconstruction and make a significant negative impact on the value of the properties. There maybe plenty of reasons to alter the location or shape of the existing driveways - trees are growing and dying, transport is changing. Who knows what cars residents will drive in 50 years. The requirement to retain the same driveway layout forever is irresponsible. Residents must be able to make reasonable changes of their plots layout.

KRO11. New/relocated/additional entrances should be agreed between the home owners and Road Trusts. Similar to KRO10 there maybe reasonable circumstances where something needs to be changed and Road trust is in agreement with it. We can't ban this option completely.

Wynne Owens

I have read this Design Statement carefully and recommend its adoption. It fairly reflects the guidance needed to preserve the Estate as a designated Conservation Area.
In my opinion, the WDS is a most important document that is needed to help safeguard the unique character of this attractive and unusual estate. Its appealing characteristics have often been under threat and the WDS is a clear statement of ways in which the important aspects of the estate can be protected. Among the most important of these is some congruence around house design so that the Wildernesse does not simply end up as a mish-mash of competing and contrasting styles as has been allowed in other areas with such unfortunate results. The WDS was put together at the behest of the WRA in order to set out some practical guidelines that the planning authorities could use when taking decisions about planning applications and as such it has my full support.

Dear Sevenoaks District Council, I have a few comments on the Wildernesse Design Statement dated March 2018. I live on the estate at [REDACTED]. The document does not appear to be of sufficient quality or content to form the basis of a legally binding document for planning purposes. My principal criticism of it is that it mandates the use of certain materials and styles of building without any flexibility. By way of examples: In our property, the original leaded windows were defective in a number of respects and had to be replaced. A like-for-like replacement with double glazing would have used lead stuck to the outside of the window to give the appearance of the original, but the finish was so artificial that we felt it would damage the overall look of the property. We therefore considered and selected an alternative design which we think complements and modernises the Arts and Crafts style. We consulted the council and were told that we could proceed on that basis. The design statement would appear to prevent others from adopting a similar approach in the future. We accept that not everyone would agree with the design choice we have made, but it is not necessary or appropriate to prevent homeowners from selecting modern materials and designs which evolve the existing design as long as they are within an overall policy framework. The Council should provide appropriate guidelines within which individual homeowners can have some flexibility to sympathetically evolve the design of their properties. A second example is that we are in an unusual situation where we share a driveway with our neighbours. In time we would like to alter the driveway and landscaping to the front of our property so that we can have our own driveway, or to move the existing driveway in a way that allows for the front of our properties to be separated by plot. The proposed design statement would prevent us from doing that. Our unique circumstances require a degree of flexibility to be incorporated within the planning policy to permit the creation of a new, or movement of the existing driveway. We believe that any policy related to driveways (if one was needed) should be to provide guidelines rather than rules. I understand that a number of individuals on the estate have similar concerns. I have read the comments of Amina Bakunowicz and think that her proposal for a series of guidelines that are consistent with the guidance provided by English Heritage should be adopted. Regards, Tom Lazur
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<td>Anna Silva</td>
<td>The design statement has been proposed without any consultation whatsoever with the residents of the Wildernesse Estate. Members of the committee who are supposed to represent the views and opinions of the resident community have acted autonomously and well beyond the remit of their role. The residents do not necessarily disagree with much of the content and most certainly the residents are supportive of protecting the estate in its overall feel and style. However we have not had the opportunity to discuss or review in order to fully understand the implications of the document. The estate has a well defined set of legal covenants that go sufficiently far in protecting the estate. The design statement appears to define a rather individual and narrow view as regards style and appropriateness. These issues are utterly subjective and a small number of individuals should not be permitted to dictate personal preference as policy. Under the current covenants and conservation area policies, each application is assessed as an individual case and I cannot understand why this practice cannot continue, thus allowing flexibility for the estate to modernise and prosper within the conservation guidelines and covenant constraints. I would suggest that the proposed statement is withdrawn, with the agreement of the estate to carry out a properly managed consultation process and then the agreed document re-submitted with the approval of the residents of the estate.</td>
<td>16 May 2018</td>
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<td>Kenneth Mactavish</td>
<td>I am in support of the principles of the Design Statement and recognise both the intention and the purpose. There will obviously be some variety in the interpretation but in general it should be adhered to. I think KR09 might be worded a little too strongly as there are existing metal gates set into brick pillars, and where the pillars are set back into existing hedges, I think these are perfectly acceptable. I agree solid wooden gates should be avoided and in fact this is something that the police feel strongly about i.e. the property being totally screened from the road, which might encourage &quot;unwanted&quot; intrusion</td>
<td>18 May 2018</td>
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<td>As residents of Wildernesse, we feel that this document does not represent the majority of Wildernesse residents. It has been put together without full consultation with residents and basically represents a very narrow, outdated &quot;opinion&quot; of how the estate should look. Residents on the estate are in agreement that it's a fantastic area to live in and conservation is of course very important. However, in our opinion, it is not the role of the WRA to personally 'police' individual planning proposals (which is what happens in the past, including our own house) dictating to home owners how they think their houses should look. By all means conserve the Arts and Crafts style to some extent, but it is far too restrictive and very unfair for residents to have to abide by this statement. People have paid huge amounts of hard earned money to live on the estate and like us end up having to pay huge additional costs to 'conserve' very unattractive buildings that have no real historical significance. It is also highly inconsistent, because I would argue that some of the properties that it suggests reflect a 'good' interpretation of an Arts and Crafts style are in fact not particularly well designed. In short, we do not think it is the role of the WRA to decide many of these matters. The height of a building for example, should purely be down to the objective evaluation of the Sevenoaks planning department, not a couple of individuals whose opinion is highly subjective and not representative of the residents of the estate.</td>
<td>21 May 2018</td>
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Dear Sir,

I am a resident of Woodland Rise and a member of the WRA, having lived in the property [REDACTED] since 2005. I have recently become interested in the Design Statement as submitted by Allan Churchman, the current Chair of the WRA, which you have adopted and put into consultation. I have a few questions for you that might be easy or not to answer but I would ask if you can put your best thoughts or involve the planning department to come back to me. Given the very short nature of the consultation I would very much appreciate a response in the next couple of days.

Comments & Questions:

* Please can you describe the process by which the Design Statement came into creation, the circumstance and approximate timings of the communications between SDC and WRA (Chair/Representatives).
* Who requested the Document to be created, SDC or WRA.
* The Objectives of SDC in respect of the Document creation and its use.
* SDC's has a fiduciary obligation in respect of the document creation, the WRA, and residents. What minimum standards would you expect for the document to be considered a legitimate representation of views of the estate residents given the residents are paying stakeholders and voting public for SDC operation and governance.
* How will the document in practice be applied by SDC when considering applications. Where there is challenge to some of the concepts raised for example reference to the "Arts and Craft's" style in respect of any application, would SDC seek third party independent assessments or in all likeliness refer planning design ambiguities back to the WRA for comment?
* The Design Statement itself as drafted is a very prescriptive view of the original concepts from 1925. Many of the original properties did not conform to these standards from 1925, and there are a few Arts & Crafts houses that do respect the original specifications. Similarly over the evolution off the last 90 years, the Design Statement does not respect the passage of time and how the estate has evolved. I estimate that 70% of the existing housing stock does not conform to the Design Statement and I would see it hard for SDC to adopt without creating a lot of confusion on all sides as the benchmark for the document doesn't exist in the reality of the current estate. Would you see it as a requirement the Design Statement is created with 2018 view of the current housing stock?
* Given the existing stock is not represented in the Design Statement, can you comment on how this could be interpreted and adopted by planners? Could for example retrospective amendments be required to revert the existing stock of housing the exacting requirements of the Design Statement as formulated in the 1925 view?
* If so has SDC considered the considerable drain on resources in time and money that could
occur with points 5),6) and 7) which could result in dragging planning applicants and SDC through costly litigation, at the expense of taxes raised by Sevenoaks residents. This also then points back to 4), SDC obligations to ensure it is balanced and inclusive in its consultation and in particular in the creation of the initial draft rather than ask for consultation post the draft's creation when it is so flawed from inception.

* Who actually owns the document, and how does it become policy within planning process, and how can content be amended and who owns the amendment rights.

* Is the document confidential, was the document ever confidential, and if this was a requirement of SDC or the WRA, who made that decision and under what authority or policy was confidentiality a requirement.

* As much as possible to support your answers I would seek that you try to provide evidence, such as meeting minutes, documents, or email.

Many thanks in advance for your attention, as you can see we have a complex problem that requires considerable for thought so that unintended consequences do not have a bearing on the estate, its residents or the good standing of SDC as municipal service provider for the community.

Kind Regards

Duncan Rodgers

Thomas Candy

General note

I have lived on the Wildernesse Estate for 29 years and I would like to see the qualities and characteristics of the conservation area maintained. I therefore support the WRA and the various other parties in developing a design statement.

Comments relating to Design statement (Feb 2018)

Overall character appraisal

I am in agreement with all the points noted.

Key requirements and objectives

I am in agreement with the KRO's but have comments on some aspects which I detail below.

There are references to the the scale of neighbouring houses in KRO1 and 2. This is difficult as neighbouring houses can be of vastly differing sizes. For example Tanglewood in Parkfield sit between myself and High Weald. High Weald is twice the size of my property so which one would a Tanglewood development be scaled against? I suggest that the scaling takes into account the plot size and the proximity of the house to its neighbours.

KRO4 I think any development must leave neighbouring properties in exactly the same position with regard to views and sunlight. I would propose the following to give more protection to neighbouring properties.

1. Extensions and replacement houses should not encroach visually on neighbouring properties.
Neighbouring houses must also be left in the same position as before with regard views and sunlight.

KRO12 I think minimal intrusion to neighbouring properties should be amended to ‘no intrusion’. To sit on your own terrace and have to listen to permanent swimming pool machinery noise from a neighbour’s new pool is unacceptable.

David Moscow

Dear Sirs,

I wish to comment on the Wildernesse Design Statement Consultation, May 2018, as a resident and past Chairman of the Wildernesse Residents’ Association.

I am strongly in favour of a Wildernesse Design Statement, particularly to help guide planning officers (some of whom may be new and unfamiliar with this unique, widely admired “building scheme” created in the mid 1920s) to achieve consistency and appropriateness in their planning advice and decisions.

However, with respect to the specific wording under “Overall Character Appraisal” and “Key requirements and Objectives (KRO)” I feel that some residents may interpret some of the statements as unfairly rigid or not representative of what we currently have on the Estate. So in the attachment to this email I have copied the Design Statement and made a few alterations to the wording (one under Character Appraisal and several under KROs, to indicate a little more clarity or flexibility, without losing or weakening the essential guidance to maintain the character of the Estate. I have also added two photographs to illustrate (a) an example of a replacement house in a sympathetic or “in harmony” traditional style and (b) another house extended in harmonious style. Some residents may want to see evolution of the architecture to ultra-modern designs, say incorporating large areas of glass. I personally would not wish to see this as it could lead to a rapid destruction, within a few years, of this unique and historic asset to Sevenoaks.

As Colin J. Davis RIBA MRTP noted in 2009 “Though there are other low density estates created in the mid-1920s, I know of no other which has carried through and retained its original ideas to the extent evident here; ...high quality houses with the illusion that they are in the countryside”

Would you kindly see and consider my suggested amendments in the attachment.

Yours faithfully,

David Moscow

[REDACTED]

T J Synnott

Wildernesse Design Statement I am a resident of the Wildernesse Estate, living in [REDACTED]. Please register my support for the Design Statement.
Dear Sirs

As a resident of the Wildernesse Estate I would like to comment on the Wildernesse Design Statement.

I am in favour of the Design Statement as I think it will provide guidelines for future building works and protect the character of the Estate. After having carefully read the Statement, I feel what is meant by the term "Arts and Crafts" needs to be explained in greater detail to avoid confusion or misinterpretation, or appear too rigid. In an article by Suzanne Waters, British Architectural Library, RIBA, she writes:-

"What to look for in an Arts and Crafts building"

* Clarity of form and structure
* Variety of materials
* Asymmetry
* Traditional construction
* Craftsmanship

Generally, I would like to see the design of any rebuilding/refurbishment of houses, extensions, garages, done in a traditional style in sympathy (harmony) with existing houses.

Yours faithfully,
Patricia Moscow

| KR01 Neighbouring houses are already very different in scale. Don't see how the statement "retains a similar scale to neighbouring houses" can apply. Appropriate scale of development is determined largely by plot size. |
| KR02 Neighbouring houses are already of different heights. Don't see how the statement "should be of similar height and scale to neighbouring houses" can apply. Suggest it should be "the higher of existing or neighbouring" |
| KR04 "Shade neighbouring properties" is too weak. Needs something like "excessively shade neighbouring properties" |
| KR05 Delete wording "matching". Its too specific. The point is adequately covered by "sympathetic to the existing house" |
| KR09 Delete first sentence. Agree that 5 bar gates are preferable but for security reasons some may feel larger/stronger gates are essential. |
| KR10 Add a qualifier: "where possible. Additional related pedestrian access will be assessed on a case by case basis" |
Dear Planning Policy Team,

Response to Draft Wildernesse Estate Design Statement Supplementary Planning Document

I write in response to Sevenoaks District Council's consultation regarding the Wildernesse Estate Design Statement (WEDS) which runs from 10th April to 29th June 2018. I act as a resident of the Wildernesse Estate and a local practicing RIBA architect.

Purpose

The National Planning Policy Framework (NPPF) sets out at paragraph 15 that Supplementary Planning Documents (SPD) should be used where they can help applicants make successful applications or aid infrastructure delivery and should not be used to add unnecessarily to the financial burdens on development. The WEDS fails to comply with this basic requirement and represents an unnecessary document that serves little planning purpose other than to create additional, unjustified, constraints on development. The 6-page document draws much of its analysis from the Wildnernesse Conservation Area Appraisal and Management Plan, which is a far more thorough and detailed examination of the area's defining characteristics and history. It is therefore unclear what purpose the WEDS serves, given that the Conservation Area appraisal successfully covers all these heritage and design matters, other than to add a further layer of policy for applicants to contend with.

The introduction makes reference to the following quote: "The Estate was conceived as a composition of fine buildings in an open, spacious, landscaped setting and strict legal controls were put in place to ensure that these concepts were carried out and retained. The effect of the covenants is vital and has been to retain the principal characteristics of the Estate, maintaining the high standards of design quality and spaciousness and the retention of hedges and woodlands. This should be given some weight by decision-makers today." It states that this quote is from page 22 of the Conservation Area Appraisal, however it is from page 23. The quote does not place emphasis on the words "strict legal controls" and "effect of the covenants is vital" as shown in the design statement. The use of this paragraph in the introduction and the added emphasis on the sections in bold above demonstrate that the purpose of the document is to reiterate the legal controls rather than to consider the specifics of the design or any other material planning matters.

Accuracy

The WEDS also appears to contain a number of inaccuracies. Under the title "History" on Page 3 it asserts that "The Wildernesse Estate, as it exists today, was laid out in 1925 on the Garden City concept". Whilst it is acknowledged that when the estate was originally auctioned in 1921 it was marketed as ‘An Ideal Freehold Garden City Site’, the information contained within the Wildnernesse Estate website details how the estate was not bought as a single lot in order to construct a garden city, with the land instead split into plots and sold to developers. The assertion that the estate was laid out on the garden city concept is therefore incorrect, and it is further telling that the Conservation Area appraisal makes no mention of this. The WEDS then states "Wildernesse Estate [was] granted Conservation Area status in December 2003", however this is also incorrect, it was granted in 1994 and extended in 1998 as the Conservation Area Appraisal makes clear.

The WEDS makes numerous references to the restrictive covenants in place on the Estate but then notes that "They are in fact a legal requirement and a separate matter to Planning Policy." Legal matters do not amount to material planning considerations and therefore should not be included within the SPD, let alone be the focus of the document. The document therefore fails to contribute to the understanding and preservation of the area. Rather, it simply repeats existing material and references legal matters outside of the scope of a Supplementary Planning Document (SPD).

The WEDS makes reference to the original houses stating that ‘many designed by leading Arts and Crafts architects, including M.H. Baillie Scott (14 houses designed by this famous architect alone, one being Grade 2 listed) remain in their very largely original form to this day, with
updating having been undertaken in an in-character manner. The 'in-character' updates however can be seen to stand in opposition to the Society for Protected Ancient Buildings (SPAB) philosophy and manifesto which was led by William Morris and has influenced building conservation worldwide, underpinning much of the UK heritage legislation. An extract of the manifesto states:

"Generally, modest, sympathetic new works allow continuing life for old buildings and can contribute positively to their interest and story. Further alterations and additions, the Society believes, are best when they complement what exists. They should not compete unduly with the old building in form or position; nor should they mimic the original or pretend to be historic. They should fulfil modern needs in a way that respects both the old building's form and context. The new should not harm the old where they meet, nor create problems with future maintenance." 

Substance

The Character appraisal itself is remarkably short, comprising some 6 bullet points, one of which simply notes that "All development should accord with the stated objectives of the Wildernesse Conservation Area and with the relevant Local and National Planning Policies." The remaining points offer generalised comments that lack focus on features that should be retained or enhanced. The "Key Requirements and Objectives" are dubious in purpose and also impose unnecessary restrictions on development. KRO3 states that "Extensions and replacement houses should follow or be designed to be in harmony with the Arts and Crafts style of the original Estate." However, in the superior analysis within the Conservation Area Appraisal, it is recognised that the design of buildings within the estate are not solely limited to the Arts & Crafts style: "Most of the houses built in the first half of the 20th Century are in the style of medieval manor houses or cottages...Further development during the latter part of the 20th Century and more recently, has encompassed a few differing architectural styles: neo-Georgian, or distinctly modern".

The WEDS fails to acknowledge this in its basic appraisal of the area and the effect of K03 seems to be that any extension or alteration to a house, or replacement dwelling, must reflect the arts and crafts style or a very specific era, regardless of its current architecture. This is clearly contrary to National and Local Policy that places no such restriction.

K05 states that "Extensions and subsidiary ancillary buildings should complement the existing house style and materials likewise. Brickwork, tile hanging, roof tiles, half timbering and matching window/front door styles should all be incorporated into the new works, sympathetic to the existing house." The very rigid limitations of design, focusing on very specific materials and a particular era of Arts and Crafts architecture does not allow for developments to evolve to meet changing policy requirements and modern issues. For example, in the emerging Local Plan KRO11 states that "New/relocated/additional entrances are not permitted in the private roads as both the roadway and verges are owned and maintained by the respective Road Trustees." Development cannot be implemented without the consent of the relevant land owners, so this policy serves no purpose.
Policy Conflict

Core Strategy Policy SP1 clearly states the Design of New Development and Conservation and specifies that all new development should be designed to a high quality and should respond to the distinctive local character of the area in which it is situated. It does not impose specific material types or limited vernaculars. The NPPF emphasises the importance of high quality design but does not advocate overly restrictive or specific design styles and preferences, as described in the Requirements and Objectives of the WEDS. The also focuses on a presumption in favour of sustainable development, which is the ‘golden thread’ of decision making and is comprised of environmental, economic and social dimensions. Paragraphs 56-68 of the NPPF puts heavy emphasis on quality design and specifically environmental sustainability. It stipulates that ‘the government attached great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.’ Good quality design cannot be measured simply by specific existing features such as hanging clay tiles, but should be allowed to evolve and adapt in a sensitive and sympathetic manner. Good design should also respond to increasing climate pressures and a growing requirement for sustainable, modern building materials and construction methods. This is emphasised in paragraph 58 of the NPPF which states that developments should ‘respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing Paragraph 58 of the NPPF also states that policy documents should have ‘robust and comprehensive policies’ and that policies should be based on specific objectives and ‘an understanding and evaluation of its defining characteristics.’ The objectives set out in the WEDS fail to fully evaluate or understand the breadth of defining characteristics across the four private roads covered by the documents and instead focus on 14 Arts and Crafts properties designed by M.H. Baillie Scott. There are some buildings within the Estate which lack any architectural merit and are not sympathetic to the Arts and Crafts Movement. These could be successfully replaced and updated to allow for more modern Arts and Crafts features to be represented, demonstrating the evolution of the movement and providing greater flexibility to meet modern needs and sustainability requirements. Imposing very limited design requirements specifying specific materials and the need for Kentish vernacular is very limiting and prevents any innovative designs from being considered. This directly conflicts with Paragraph 59 of the NPPF which states that ‘design policies should avoid unnecessary prescription of detail’ and goes on to state in paragraph 60 that ‘planning policies and decisions should not attempt to impose architectural styles of particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles.’ The KRO set out in the WEDS directly conflicts with these national policies and therefore should not be considered for adoption by the local planning authority. The SPAB promotes modern alterations to complement, but not overwhelm old, whilst WEDS argues the principle and denies the option of introducing a beneficial contemporary interpretation of the old that does not compete with the historic parts but enhances them. Imposing a very specific set of materials limits the possible options for alterations or extensions to a historic building in a detrimental manner. The SPAB states that whilst using similar materials is often appropriate, modern additions are often effective, ‘use of alternative materials may be more fitting and effective, allowing new work to be distinguished from the old, and illustrating that an intervention has occurred. Equally, use of alternative materials can sometimes assist the maximum retention of historic fabric.’

Consultation

The Wilderness Resident’s Association (WRA) are very concerned about the process of the preparation of this document, which, as we understand it, was prepared by a single resident. The WRA did not request that the document was prepared and in light of the fact there is already a perfectly adequate Conservation Area Appraisal for the area, believe it is unlikely that the Council considered it an essential document. It therefore appears to have been prepared by a single
resident and during the drafting process the document was not discussed with the residents. The residents were not consulted on its contents prior to submission to the Council and the document is not representative of the Residents' views regarding the key design matters in the area. As we understand it, no third party professional specialising in architecture, design, heritage or planning matters has been consulted during the preparation of this document, which is due to become a formal adopted policy document and will have implications for future decision making. A local resident and qualified architect offered to assist will the preparation of the document to provide some accurate design commentary, however this offer was rejected. 

Summary
It is fully recognised that the Wildernesse Estate is a special place, worthy of its Conservation Area designation, however the current WEDS proposed fails to add to the existing appraisal and instead is strewn with inaccuracies, a vague and generalised analysis of the area and overly restrictive policy, against the recommendation of national policy. There is clearly scope for an updated Conservation Area Appraisal in light of the extensive changes that have taken place within planning policy since its adoption, as this would further assist with the enhancement of the Estate, however there does not appear to be any need or place for a further document, particularly one focusing on the opinions of a single resident and restrictive covenants which do not amount to a material planning consideration. 

In light of the above I trust that Sevenoaks Council will not proceed with adoption of the SPD and instead allow for a better document to be produced in due course. If Sevenoaks District Council wish to discuss any of the matters above with the Wildernesse Estate residents I would be delighted to coordinate this.

Yours sincerely,
Amini Bakunowicz ARB RIBA BS(Hons) MSc(1st) 
Founder, managing director and senior architect, ArchiLab 7 Ltd. 
and 
Wildernesse Estate Resident, [REDACTED]

We support the aims and objectives of the Wildernesse Estate Design Statement dated February 2018 and broadly endorse the key requirements and objectives listed therein.

David and Claire Williams, [REDACTED]
John and Mavis Phipps

Dear Sirs,

Wildernesse Estate Design Statement Document

My wife and I have been residents of the Wildernesse Estate for over 40 years and we make our comments from that background. We have enjoyed the amenities of an Estate where every house is individual, set on a reasonable area of land, which is sylvan in nature and maintained to a high standard. The Covenants for one house per plot has been, and will be, essential to maintain a sensible density of housing on this estate.

We agree in general with the Wildernesse Resident’s Association Design Statement but would comment on some of the perceived nature of the document as too prescriptive. We believe it is a statement of its inception and merely gives examples of what has been acceptable both in design and materials over the years.

Unfortunately the Statement has got ‘bogged down’ with the ‘Arts and Craft’ movement of between the wars as the acceptable design. This could be argued, and indeed has been so argued, that this could mean any design is acceptable depending on the era of build and country of origin. What is required is a ‘good’ house that complements the area in which it is built, has modern amenities, and utilizes materials and innovations that are technically proven and ecologically sustainable.

It is difficult to say what is going to be acceptable in the future and we can only look back at what has been done over the last 30 years to see the trend. In Parkfield over this period 50% of houses have changed, either by extension, alteration or new build on the existing footprint. Although our view is very subjective they are in our mind ‘good’ houses that compliment the area and could be held as examples for the future to provide individual modern homes. What is probably not acceptable in this context is beautifully designed ‘glass’ house that looks so good on an isolated plot overlooking a lake in Europe with a background of rugged mountains.

On other areas we should also not be specific about such things as five bar gates as time has already moved on. Although we personally like them there are now many other gates, both metal and wood, which are very attractive and may give some perceived security to the property. However tall obscuring gates do not look attractive and do little to aid further security. Also hard standing is difficult to be specific about as it depends on the position of the house within the plot and the number of cars that use it routinely. In general this is good in Parkfield and we assume the planning team would be circumspect in this matter.

We have seen the Estate change, or rather evolve, over many years. We hope it will continue to evolve over the forthcoming years in a similar manner, using the Wildernesse Design Statement as a guideline.

Yours sincerely

Drs John and Mavis Phipps

630961 25 June 2018

Anthony Eves
Checking to see if this works

627809 26 Jun 2018

Tony Aston
I have no problem with the overall thrust of the Design Statement. I feel the ‘Key Requirements’ would be enhanced by stating (i) The built environment should always be subordinate to the natural one (ii) Houses should be sited so that as far as possible they do not overlook (or are themselves overlooked) by others - having a ‘natural’ outlook (also known as the ‘borrowed

627963 26 Jun 2018
**Alastair Crawford**  
I object to the current draft on which, in common with most other WRA members, I was not consulted prior to its publication.

Some general comments first. The current draft KROs place too much emphasis on maintaining a style and size of house which may have been fit for purpose in the 1920s but is arguably not fit for purpose now. In my view, the key planning consideration should be to prohibit the construction of any house or structure which offends against the building covenants which bind all residents on the estate, and in particular, the covenant which prohibits the construction of more than one house per plot. Beyond that, residents should be permitted to build replacement houses in styles other than ‘arts and crafts’ and, depending on the circumstances, larger houses than those being replaced. I would favour planning restrictions which preserve the essential woodland character or the estate but, this not being my area of expertise, I hesitate to put forward drafting suggestions. In this regard, I think that the WRA should take expert advice in order to come up with an alternative draft design statement which can hopefully meet broad approval by an overwhelming majority of residents.

In relation to the specific draft KRO’s it follows from what I have said above that I object to KROs 3, 5 and 6.

I am supportive of KROs 4, 7, 12 and 18.

KRO 9 is overly prescriptive.

KROs 10 and 11 should be rolled into one and the revised KRO should read as follows: ‘No changes to the dimensions or locations of driveways over the verges and no additional entrances are permitted without the consent of the relevant Road Trustees who own the verges and roads’.

**General comment:**

The KROs appear to comprise a mixture of planning policies, planning guidance, Wildernesse Estate covenants, and design preferences. If this document is to be useful as the key point of reference for future planning and development within the area, it would be better to make clear which of these things the KROs represents.

**KRO 1**

* a) Is the “no higher” an absolute rule, or might it be breached in certain circumstances?  
* b) “Similar scale to neighbouring houses” makes no sense if one is extending a large house which happens to neighbour a much smaller house. There is a wide variety of house size on the estate already, so why should one be limited by the size of a neighbour’s house?

**KRO 2**

Same comment as KRO1 b. above.

Also, the opportunity should be taken in the near future to review which houses genuinely contribute to the character of the conservation area through architectural merit, as opposed to merely through their age and setting. Several properties are classified as such yet are widely
regarded as unattractive, of low quality or undistinguished, and would be better replaced than kept or extended. In those cases, high quality new building sympathetic to the conservation area "qualities and characteristics" and incorporating efficient and sustainable insulation and energy provision, would enhance the conservation area more than retention and/or extension.

KRO3/KRO5

Agree that "Arts and Crafts" style should predominate, but there is a wide variety of architectural styles across the estate some of which bear negligible signs of what is generally regarded as "Arts and Crafts" of the 1920s and earlier. There ought to be scope for an extension to be built in harmony with the existing building without the extension itself being obviously in an Arts and Crafts style.

KRO7/08

What is "excessive hard landscaping" and "hard standing... kept to a minimum" in the context of an estate of mainly large houses where on street parking is strongly discouraged?

KR09

This feels like a battle that has long since been lost as there are many examples of brick piers and metal or solid wooden gates. It should not be in this document.

KR10/11

There can be no "conservation" or planning reason why the existing entrance driveways must be retained. It is true that verges are not owned by individual residents and so an entrance could not be moved without the consent of the road trustees, but if there is a sound reason for moving one then it ought to be possible, subject to that consent.

Linda Campin
Planning Policy
Sevenoaks District Council

Comment on the Draft Wildernesse Design Statement Consultation (May 2018)

[REDACTED]

Dear Sirs

We are writing in to respond to the Draft Wildernesse Design Statement Consultation Document.

We believe we are very lucky to live on The Wildernesse Estate and to enjoy the environment that has been protected by the Wildernesse Conversation Area. We think that it is important that we continue to protect it for future generations.

What is special about the estate is the proportion of house size to garden and the fact that whilst in keeping with each other the houses are all individual. The covenant of one house per plot is key in retaining this spacious nature of building.

It is a good idea to have a core design statement which residents can comply with to retain the unique nature of the estate.
In response to the draft Key Requirements and Objectives we make the following comments

KR01
We agree that extensions should not exceed the height of the main house and they should not be disproportionate.
However rather than the extended house be of a similar scale to neighbouring houses (some plots are much bigger than others) it should be an appropriate size for its plot.

KR02
We consider that any replacement house should be looked at it in a similar way to that of an extension of an house and should be of an appropriate size for its plot.

KR03
Extensions and replacement houses should be sympathetic with neighbouring properties. The overriding objective is for a good quality house to be built which fits in with the estate.

KR04
We agree Extensions and replacement houses should not encroach visually on neighbouring properties to avoid the appearance of "over development" or "terracing" nor should they intrusively overlook or shade neighbouring properties.

KR05
We agree extensions and subsidiary ancillary buildings should complement the existing house style and materials and should be sympathetic to the existing house. (But nothing else to be specified).

KR06
We agree garages including where accommodation is incorporated over should be in a similar style to the main house or of a rural style.

KR07
We agree the natural cover including hedges, trees, shrubbery between the houses and the shielding of buildings from the road shall be retained together with the avoidance of solid fencing and excessive hard landscaping.
(It is the woodland nature of the landscape on the estate that we wish to conserve)

KR08
We agree hard standing at the front of houses in the Estate should be kept to a minimum and any hard landscaping should complement the overall character and setting.
<table>
<thead>
<tr>
<th>KR09</th>
<th>Do not agree with any specified form of gate, but boundaries fronting roads should be formed of natural hedging.</th>
</tr>
</thead>
<tbody>
<tr>
<td>KR010 and KR011</td>
<td>In the private roads the existing entrance locations are required to be retained unless a change is agreed with the owners of the road and verges (the road trustees). The assumption should be that the existing entrance/ driveway locations are retained but we are not sure that this needs to be listed as a KRO.</td>
</tr>
<tr>
<td>KR012</td>
<td>We agree Tennis courts, swimming pools, large garden buildings should be sited out of view from the road and located such that they cause minimal intrusion on neighbouring properties. Similarly exterior lighting of all forms shall be designed to minimise light pollution and intrusion on neighbouring properties in accordance with policy EN6.</td>
</tr>
</tbody>
</table>

Kind regards
Linda Campin

Richard Kendle

I am writing to object to the proposed Wildernesse Design Statement. My property sits within the Wildernesse Estate having a boundary and access to Wildernesse Avenue.

You are probably aware that the authors of the proposed Design Statement are a small group of former Wildernesse Residents Association committee members. The document was prepared by them without consultation with other members and represents their personal views. These views are not shared by me and seemingly not by most residents.

It is evident from the proposals that this small group would like to resist change and favour an architectural style that was prevalent almost 80 years ago. I fundamentally disagree with this view.

I'm sure all residents would like to see the estate's general appearance preserved. I believe this is largely achieved by the estates Roads Committees enforcing the covenants. These covenants prevent more than one dwelling per plot (a plot being defined in the original 1925 sales documents), establish setbacks and restrict access to the estates roads.

Virtually all the current properties sit in large well landscaped plots. Many properties are barely visible from the road. There are grass verges, no pavements and vehicle traffic other than by residents, their guests and those who service their properties is restricted by barriers. It is this characteristic rather than any form of architecture that defines the estate.

I can comment on the specific proposals as follows:

KR01, KR02, KRO4, KRO12

All of these refer to matters that would normally and correctly be dealt with by current planning
rules. I do not agree with any attempt to create a more prescriptive policy.

<table>
<thead>
<tr>
<th>KRO3</th>
<th>Extensions and replacement houses should follow or be designed to be in harmony with the Arts and Crafts style of the original Estate.</th>
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<tbody>
<tr>
<td></td>
<td>There is a wide variety of styles and sizes of buildings on the estate. I disagree with any policy that seeks to prescribe a style of architecture. Subject to general planning rules property owners should be free to develop their properties in whatever architectural style they wish. This could include a mix of traditional and contemporary architectural styles applied to a single building. Architecture is a form of art. It evolves over time as does the manner in which we enjoy our homes. We don't all like the same thing.</td>
</tr>
<tr>
<td></td>
<td>KRO5 Extensions and subsidiary ancillary buildings should complement the existing house style and materials likewise. Brickwork, tile hanging, roof tiles, half timbering and matching window/front door styles should all be incorporated into the new works, sympathetic to the existing house.</td>
</tr>
<tr>
<td></td>
<td>As KRO3 above this is prescriptive and inappropriate</td>
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<td></td>
<td>KRO6 Garages, including where accommodation is incorporated over, should be in a similar style to the main house or of a rural style e.g. Kentish wooden barn</td>
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<td></td>
<td>I disagree with this proposal. There is no reason why ancillary buildings should be in the same style as the main house and the reference to a &quot;Kentish wooden barn&quot; is simply absurd.</td>
</tr>
<tr>
<td></td>
<td>KRO7 The natural cover including hedges, trees, shrubbery between houses and the shielding of buildings from the road shall be retained together with the avoidance of solid fencing and excessive hard landscaping.</td>
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<td>I agree in principal with this to preserve the current appearance of the estate. However, most people now wish to secure their boundaries to discourage unwanted visitors. This may necessitate hard fencing.</td>
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<td></td>
<td>KRO8 Hard standing at the front of houses in the Estate should be kept to a minimum and any hard landscaping should complement the overall character and setting</td>
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<td>It is undoubtedly desirable to preserve the overall appearance of the estate but, subject to general planning rules, owners should be free to do whatever they wish with their property in this regard.</td>
</tr>
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<td></td>
<td>KRO9 Large front metal and solid wooden gates, set between brick piers, should be avoided. Five-bar oak wooden gates, as defined in the original 1925 documents, remain the much-preferred option to maintain the rural idyll objective of the Estate. Boundaries fronting roads should be formed of natural hedging.</td>
</tr>
<tr>
<td></td>
<td>I disagree with this proposal. There is currently a wide variety of piers and gate styles and materials used. The majority appear to provide brick or stone piers with metal (not solid) gates. It is clearly a minority view that &quot;Five-bar oak wooden gates, as defined in the original 1925 documents, remain the much-preferred option&quot;. If this were true, why are there so few 5 bar wooden gates installed today?</td>
</tr>
<tr>
<td>KRO10</td>
<td>The existing entrance/driveway locations shall be retained</td>
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<td></td>
<td>I disagree. This is a matter for the estates Roads Committees and does not require any planning intervention.</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>KRO11</th>
<th>New/relocated/additional entrances are not permitted in the private roads as both the roadway and verges are owned and maintained by the respective Road Trustees.</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>I disagree and believe this statement to be inaccurate. New/relocated and additional entrances are permitted but subject to the absolute discretion of the Roads Trustees. This is not a planning matter.</td>
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<tr>
<td></td>
<td>I urge the council to disregard this Design Statement. As planners you should allow the Wildernesse Estate to evolve with varying architectural styles whilst demanding a high quality of design, materials and construction.</td>
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</table>

Barry Vanns Associates Ltd., (Barry Vanns)

We are generally in agreement with the KRO's listed in the document to retain the existing style and scale of building. KRO4 and 7 are also very important to retain the sylvan nature of the estate.

KRO9 on the other hand is a bit late in the day as many properties already have higher more secure gates. Five bar gates offer very little security.

KRO's 10 and 11 are not planning issues so maybe should not be included.

Mary and Barry Vanns.

<table>
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<tr>
<th></th>
<th>630967</th>
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<td></td>
<td>26 June 2018</td>
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</tbody>
</table>
Dear Sir,

My wife and I write as residents of [REDACTED] and members of the Wildernesse Residents' Association. We would like to comment on the Wildernesse Estate Design Statement 2018 ("DS").

In our opinion the Overall Character Appraisal which forms part of the DS gives the impression that the whole estate is dominated by Arts and Crafts style houses and that past developments have retained this style. We quote:

* · "The very large proportion of the original houses, many designed by leading Arts and Crafts architects, including M.H. Baille Scott (14 houses designed by this famous architect alone, one being Grade 2 listed) remain in their very largely original form to this day, with updating having been undertaken in an in-character manner." NB our underlining.

* · "Replacement houses and extensions have generally retained the predominantly Arts and Crafts style, which varies with each individual house. The external characteristics include Kentish bricks, oak beams and doors, leaded lights, clay tile roofs and tile hanging." NB our underlining.

Today if you walk down Parkfield or any other roads on The Estate you would not recognise many houses that fit the above descriptions but you would see any number of new houses that enhance the roads. It is very difficult to describe in writing "preservation, enhancement and character" but we would suggest removing the two paragraphs above which in our view are misleading and inaccurate.

Another section of the DS is Key Requirements and Objectives ("KRO"). To laypersons such as ourselves many of these KROs seem sensible and would be dealt with as part of the normal planning process anyway but we think some KROs should be redrafted or removed, for example:

"KRO3 Extensions and replacement houses should follow or be designed to be in harmony with the Arts and Crafts style of the original Estate." We would remove this KRO. As an example of our reasoning, the requirement for the new house being constructed on the corner of Blackhall Lane and Park Lane to be thatched is ludicrous.

"KRO9 Large front metal and solid wooden gates, set between brick piers, should be avoided. Five-bar oak wooden gates, as defined in the original 1925 documents, remain the much preferred option in order to maintain the rural idyll objective of the Estate. Boundaries fronting roads should be formed of natural hedging." Although the reference is to the much preferred option (which is hardly a key requirement) it does not reflect what has actually happened. These days security is a big issue and most new builds have automatic gates of various styles and existing houses have also put in automatic gates. For example, over one half of the houses in Parkfield have security gates of which only two are five bar style. We would remove this KRO.

"KRO10 The existing entrance/driveway locations shall be retained" and "KRO11 New/relocated/additional entrances are not permitted in the private roads as both the roadway and verges are owned and maintained by the respective Road Trustees." We would redraft KRO10 and KRO11 as we think they are misleading. For example, in Parkfield The Trustees hold the roadway and verges in trust for the residents and if the residents approved, for example, of a particular application to relocate a drive then The Trustees would respect the decision of the residents.

The DS is dominated by photos of Arts and Crafts houses predominantly in Woodland Rise and, if
photos are to be shown at all, should show a similar number of photos of new builds which enhance the character of the estate. The estate has already evolved away from the Arts and Crafts style and will continue to do so but if people want to build new Arts and Crafts style houses, so be it, they are free to do so.

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To summarise, we feel that emphasis should be on quality and gradual evolvement as new and exciting designs emerge. We cannot remain in an Arts and Crafts bubble. The DS does not reflect the manner in which Parkfield has developed over the years and we are sure that residents of Parkfield both present and future would not want to be restrained by a design concept which is to our mind so restrictive and subjective that it amounts to extreme style policing.

Yours faithfully,

Hilary and Christopher Thomas,

[REDACTED]

Following our comments email sent to you on 17th May 2018, we are now writing with our further thoughts.

A Design Statement should be to give the planners guidance only so that inconsistent planning decisions are not made and to make the planners aware that some houses on the Estate are not suitable for 21st century living.

It is important that if there is a Statement that it is progressive, looking forwards not retrospective looking backwards or leaving things as they are.

Arts and Crafts houses were considered radical for their time back in the 1920s but that is not the case now and times have moved on and we need to move on.

21st century living is very different to 20th century living. Families want and need different things
- accessibility
- en suite bathrooms
- more living space

Brendan Tynan

630974
26 June 2018
- more natural light
- solar panels
- more energy efficient homes
- double or triple glazing
- more garage space
- more space to park vehicles as many houses have 3 or more cars and parking is not permitted on the Roads
- swimming pools
- tennis courts

as examples. All owners on the Wildernesse Estate should be able to incorporate these things into their properties. Some people work from home and their needs also must be considered. These requirements all need to be considered by the planners.

If these things cannot be achieved successfully by remodelling or extending a house then any house should be able to be demolished. Building regulations have changed so much over the years that some of the older houses would be considered unfit for modern day living and certainly unsuitable for disabled or elderly people. Some of the houses are built on various levels within the house that means there are steps or stairs within the ground floor level. This is not suitable for either disabled or elderly people.

We look forward to reading all the feedback after the Consultation period has closed.

Regards

Brendan and Janet Tynan

Anthony Eves

Our comments are as follows.

We disagree with KRO 1 specifically and indeed many of the other KRO’s which are set out in the key requirements and objectives of this paper. They simply are too specific and detailed.

Our house is of cottage design with a very low height level but sits on a plot in excess of 1 acre. We even have to stoop to see the garden properly from the bedroom window. Neighbouring houses are of different height level. If we take the height level of our direct neighbours being Craigower then that would be acceptable. The main house is small but the land that we have justifies a better and much larger building.

Extending houses some of which were only around 2000 sq ft. when built simply cannot be extended to accommodate the average build size now of around 5000 sq ft. for plots of these sizes and which is demanded by most new residents to the area.

There are covenants namely that only one property can be built on each plot which has, since the
houses were built protected the conservation area to retain the spaciousness that presently exists.

There are no minutes to any meetings which the WRA have held with the Council on the Design Statement and we question as to whether the representative of the WRA may have been expressing a personal view in their discussions with the Council.

In any event we have not been advised that such discussions have been taking place.

Regards
Anthony & Jacqueline Eves

Nigel Wightman
I am a resident of the Wilderness Estate, having lived on the estate for 30 years and witnessed a significant change to its architecture but not its overall character over that period. I was not consulted or informed about the development of the draft Design Statement prior to this consultation process.

I believe that the Statement places far too much emphasis on the concept of 'Arts and Crafts.' As the basis for a design statement I believe that the concept is far to vague to be of use. It is intended to refer to the small number of houses built in the early years of the estate in a certain vernacular style with the use of tiles, wood and exposed brickwork. Such houses were quite small, typically with low ceilings and small windows. The great majority of the houses in the estate including houses built later and replacement houses cannot be described as 'Arts and Crafts' in any sense. Indeed the trend over the past 20+ years has been to build in what could be called a 'Neo-Georgian' style - houses of considerable size with large (mainly sash) widows, large rooms and high ceilings. The second bullet point in the Appraisal section is therefore not correct, I believe, nor is the third bullet point (concerning garages). I note that none of these 'Neo-Georgian' houses has been illustrated in the Design Statement.

In my view overwhelmingly the most important factor in retaining the character of the Estate has been the covenants (which as noted is a legal matter and is separate to planning policy). The covenants are reinforced by the ownership by Trustees of the verges in most of the Estate, further restricting access/development.

Turning to the KROs I have the following comments:

KRO1: Plot sizes in the Estate vary widely as do the sizes of existing houses. Both extensions and replacements should be appropriate to the size of the plot and should not encroach on boundaries. There should be no requirement or presumption that all houses should be the same scale. The protection of neighbouring properties is dealt with in KRO4.

KRO2: The same points apply here so I consider this redundant.

KRO3: I do not believe that there should be any presumption as to architectural style and therefore consider this redundant.

KRO5: Agreed, although only the first sentence is needed.

KRO6: Agreed but the text after 'main house' is unnecessary
Many houses already have metal or solid wooden gates with brick piers and it is therefore unrealistic to try to turn back the clock. Boundaries should indeed be of natural hedging.

This is a legal point and therefore not relevant to this Statement

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### Allan Churchman

I fully support the Wildernes Estate Design Statement which will greatly assist Residents and their Professional Advisors when applying for Planning Permission within the Wildernes Estate Conservation Area.

### Alan Jamieson

**Summary of comments**

The proposed Design Statement does not reflect the reality of the wide variety of architectural styles already present in the estate but instead seeks to impose a blanket requirement for all replacement properties to be in or close to the Arts and Crafts style. The statement is unduly restrictive and regressive whereas it should allow for the replacement of houses with modern designs of quality that would fit within this semi-rural setting and also meet the space needs of modern owners and families.

The Statement also imposes unnecessary and arbitrary restrictions in areas such as fencing, hard standing gates, etc which are unnecessary and would restrict the utility of houses in the estate for modern use.

The Overall Character Appraisal gives a misleading sense of the present character of the estate, suggesting that the Arts and Crafts style is dominant. This is not the case. There are a number of Arts and Crafts houses but a majority of the properties on the estate are not Arts and Crafts and have been built in a wide range of more modern styles. This incorrect assessment underlies a number of restrictive requirements, the effect of which would be to impose on the developers of replacement properties a requirement to build within a much narrower range of styles than those already prevalent throughout the estate.

Many of the Arts and Crafts houses on the estate are very small and quite unsuited to the needs of modern home owners. What was practicable in the 1920's or even the 1960's is not appropriate or suitable for today's market. Seeking to impose restrictions such as these threatens the overall wellbeing and viability of the estate in the long run, as it will suppress much needed development to replace out of date houses and reduce the attractiveness of the estate to new owners. Over time this must result in less investment and a long term deterioration in the quality and maintenance of the properties on the estate. That cannot be the goal of a design statement.

**Key Requirements and Objectives**
This is too restrictive. The existing house might be a bungalow or have a low roof line and there is no reason why it could not be raised in height to accommodate sensible space needs, provided the extended building meets the general planning standards for the estate. Where an existing house is of notable quality further restrictions might be appropriate, but the protection of such properties should be achieved without this blanket restriction.

This is a regressive and unnecessarily restrictive requirement.

Most houses on the estate have no particular architectural merit. Many are too small, unmatched to the scale of the plot and unsuitable for modern family needs. Over time such houses have been and should continue to be replaced by new owners with houses of modern design and of a size that meets the space needs of the modern age. A requirement to replace these with houses "in harmony with the Arts and Crafts style of the original Estate" suggests that the developers of replacement houses are forced within size and design constraints that may make it impossible to redevelop properties on an economical basis to meet the size and use needs of a modern family. The Arts and Crafts style was developed at a time when expected property sizes were much smaller than they are now and the space expectations of property owners were much more modest. It is regressive to suggest that modern developments must be restricted to this unsuitable standard and it is quite inappropriate given that, viewed as a whole, the estate is no longer "in harmony with the Arts and Crafts style of the original Estate".

The design statement should allow for the development of modern architectural gems which fit within the semi-rural environment of the estate and do not detract from the remaining notable examples of Arts and Crafts style.

The requirement that "Brickwork, tile hanging, roof tiles, half timbering . . . should all be incorporated into the new works" assumes that the existing property incorporates all of these features. This is not universally the case and where it is not, this requirement is a nonsense. The first sentence of this requirement taken on its own is sufficient.

Boundary fences are already widespread throughout the estate and serve a useful function where shrubbery has already been lost, as well as providing security.

It may have been appropriate to restrict hard standing in the 1920's when few families had more than one car. In the modern world significantly more hard standing is needed to support the needs of families and the way properties are used. It is also policy across the estate to avoid parking on the estate roads wherever possible and this contributes a great deal to the semi-rural appearance. This is entirely inconsistent with this requirement.

At least three quarters of all front gates within the estate are of metal or solid wooden construction. The requirement for five bar gates is pointless and quixotic.

The comment regarding fences at KRO7 also applies to KRO9.

These are not a matter for Planning guidelines, but for the various road trustees. It is not appropriate or necessary to tie the hands of trustees as regards requests for a change of access.
<table>
<thead>
<tr>
<th>S. No.</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Generally agree with the Design Statement as it incorporates existing planning guidance. However we have some comments.</td>
</tr>
<tr>
<td>2</td>
<td>KR03 - Should not be prescriptive about Arts &amp; Crafts style as by no means all the original houses were in this style. Extensions and replacement houses should be sympathetic to the Arts &amp; Crafts style and reflect the fact that the Estate is a conservation area.</td>
</tr>
<tr>
<td>3</td>
<td>KR05 - This should not be prescriptive about brickwork, hanging tiles, half timbering being included in extensions if these do not feature in the existing building. This could be dealt with by inserting the words &quot;for example&quot; before &quot;Brickwork&quot;.</td>
</tr>
<tr>
<td>4</td>
<td>KR08 - It is a fact of life that most households now have multiple vehicles and need significant amounts of hardstanding to accommodate their own vehicles and those of their visitors/contractors etc.</td>
</tr>
<tr>
<td>5</td>
<td>KR09 - Probably half the Estate now has metal gates; the solid gates are more objectionable. Many houses have electric gates for security reasons. Five bar gates are not the most effective option as electric gates. However, a number of residents have put in place non-solid wooden gates that are very attractive, effective as electric gates and sympathetic to the Conservation Area.</td>
</tr>
<tr>
<td>6</td>
<td>KR09, KR010 and KR011 - Matters relating to boundaries fronting roads and verges/entrances are governed by the individual road trustees.</td>
</tr>
<tr>
<td>7</td>
<td>Brendan Tynan</td>
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<tr>
<td>8</td>
<td>We are writing to you to provide our comments on the Wildernesse Design Statement. The WDS (Wildernesse Design Statement) drawn up by a few people (not all members of the Wildernesse Residents Association were consulted before it was submitted) cannot and must not be considered the views/opinions of ALL the residents of the Wildernesse Estate. Our comments are as follows:</td>
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<tr>
<td>9</td>
<td>KRO1 - Do not agree that extensions need to retain a similar scale to neighbouring houses. Some of the houses on the Estate are of a cottage style and small and you should not be penalised by the size of your neighbours properties.</td>
</tr>
<tr>
<td>10</td>
<td>KRO2 - Disagree (same reason as KRO1)</td>
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<tr>
<td>11</td>
<td>KRO3 - Times move on and new houses should be of a style chosen by the owner and approved by the Council. Some of the new houses that have been built in recent years are absolutely stunning and enhance not detract from the Estate.</td>
</tr>
<tr>
<td>12</td>
<td>KRO4 - Agree</td>
</tr>
<tr>
<td>13</td>
<td>KRO5 - Agree</td>
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<tr>
<td>14</td>
<td>KRO6 - Agree</td>
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<tr>
<td>15</td>
<td>KRO7 - Agree too much solid fencing along a property's frontage should be avoided.</td>
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<td>16</td>
<td>KRO8 - Agree</td>
</tr>
<tr>
<td>17</td>
<td>KRO9 - Disagree. Gates design should be the owners choice.</td>
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<tr>
<td>18</td>
<td>KRO10 - If owners want to move the position of their entrance/driveway this should be allowed if agreed with the Trustees of the road.</td>
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<tr>
<td>19</td>
<td>KRO11 - Agree no new or additional driveways allowed but driveways can be relocated.</td>
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<tr>
<td>20</td>
<td>KRO12 - Disagree. Some properties are set well back on their plots and the south facing aspect is at the front of the property which is where a tennis court or swimming pool would ideally be sited. Agree excessive lighting should be minimal used. Planning applications that are submitted and refused for ridiculous reasons need to be avoided.</td>
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</table>
The majority of plots on the Wildernesse Estate are an acre or more in size and if an owner wishes to demolish an old existing property and replace it with a new modern property this should be allowed. Many of the properties can hardly be seen from the road so why try and impose so many restrictions. It is very expensive to update old properties for 21st century living. Ad hoc extensions sometimes do not enhance a property and a better aesthetic result would be achieved by a new build. As an example virtually all of the original houses had no ensuite facilities and were very small. In today's market buyers want ensuite facilities. We need to get a balance between keeping the Estate a highly desirable place to live and moving with the times and the needs of modern day living. Imposing some of the Key Requirements and Objectives would be too restrictive. Regards Brendan and Janet Tynan

<table>
<thead>
<tr>
<th>CHRISTOPHER CORRIN</th>
<th>628797</th>
<th>28 Jun 2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>I believe that the Wildernesse Estate does need to have a Design Statement and am supportive of the one proposed: Wildernesse is a conservation area that in terms of similar areas in Sevenoaks is still largely unspoiled and has a certain character in terms of the size of plots, design of dwellings, layout of roads, hedges, trees and verges that make it particularly attractive and unusual. Planning decisions relating to the estate in the past have been subject to inconsistencies, partly simply because of the turnover of planning officers at SDC, but also because decisions have been fairly ad hoc in the absence of a single set of guidelines for planners (and residents) to consult. The first thing to say about the proposed Design Statement is how relatively low key and unrestrictive the proposed Key Requirements and Objectives are in my view. There is very little here that appears to be either new or controversial - for the most part the KROs appear to be merely restating the planning guidance that already exists and, if watered down much more, would not be providing any worthwhile guidance. Turning to specific points, KROs 1 and 2 are particularly useful in clarifying the desirable size of replacement houses or extensions and KROs 5 &amp; 6 are helpful in clarifying the desirable style of garages and extensions in a fairly commonsense fashion (i.e that they should be in keeping with the main dwelling). KRO 3 might usefully be slightly expanded to include a description of building materials and broad styles that mark out the architecture of houses in the Wildernesse since &quot;Arts and Crafts [architecture]&quot; is a fairly broad descriptor, perhaps by mentioning the use of brickwork, hanging tiles, roof tiles, hipped and gable roofs etc in replacement houses as well as extensions. Personally I think that KRO 9 goes unnecessarily far in suggesting that metal gates be avoided as there are some examples of these on the estate that are quite elegant and do not look out of place. In conclusion, I think that the Design Statement would play an important part in helping to protect the character of the Wildernesse Estate and lead to greater consistency of planning decisions in the future.</td>
<td></td>
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<tr>
<td>Laing-Williams</td>
<td>KRO9 &quot;Large front metal and solid wooden gates, set between brick piers........&quot;</td>
<td>629001</td>
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<td></td>
<td>This statement is outdated. Many properties on the estate have large metal or wooden gates between brick piers. This reflects the changing situation concerning the security of properties on the estate. Residents should be allowed to install appropriate gates for security purposes which may consist of large metal or wooden gates between brick piers. If such gates are installed then their design should be of the see-through type and not solid.</td>
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<table>
<thead>
<tr>
<th>Philip Eves</th>
<th>I strongly disagree with the proposals within the Wilderness Design Statement.</th>
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<tbody>
<tr>
<td></td>
<td>The document is far too prescriptive throughout and makes the assumption current and future decision makers are not up to the job and cannot be trusted despite their years of education, experience and passion for their roles.</td>
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<td></td>
<td>This document will tie the hands of current and future planning and heritage officers. It will tie the hands of current and future residents. It does not allow the built environment to evolve with time and with the people using the properties. It does not allow people to improve where deemed appropriate and move with the times whilst being sympathetic to the heritage.</td>
</tr>
<tr>
<td></td>
<td>The Estate is a wonderful residential area with so much to offer residents both now and in the future. This does necessitate it become a museum to the past. The decision makers should be given the ability to use their expertise and allow the Estate to develop as they feel appropriate for the age in which the decisions are being made.</td>
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<td></td>
<td>We need to have faith in future planners and other decision makers that they will have the ability to make the right decisions at that time and not tie the whole estate down with the views of the residents of the past.</td>
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<td></td>
<td>I trust future decision makers. I think they will be passionate about our built environment. I believe they will make the right decisions.</td>
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<tr>
<td></td>
<td>I feel this document is far too prescriptive. I believe this document is totally inappropriate and demeaning of future decision makers. It should be rejected.</td>
</tr>
<tr>
<td></td>
<td>Taking each Key Recommendation and Objective (KRO) in turn:</td>
</tr>
<tr>
<td></td>
<td>KRO1 Extensions should not exceed the height of the main house. They should not be disproportionate to the main house, so that it retains a similar scale to neighbouring houses.</td>
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<td></td>
<td>This is a matter to be dealt with by the appropriate planning officer at the time of making the decision and in accordance with each individual situation. There is no requirement to be so prescriptive.</td>
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<tr>
<td></td>
<td>KRO2 Replacement houses, where the original does not contribute to the Conservation Area, should be of similar height and scale to neighbouring houses</td>
</tr>
<tr>
<td></td>
<td>As per my comment above. How can the authors say now what future interested parties might feel is appropriate at a future date? Planning policy is there to give the decisions makers the framework to make the right decisions without dictating to the officers the minutiae.</td>
</tr>
<tr>
<td></td>
<td>KRO3 Extensions and replacement houses should follow or be designed to be in harmony with the Arts and Crafts style of the original Estate</td>
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This assumes the Heritage Officer is unable to express a valid opinion and should therefore be dictated to.

KR04 Extensions and replacement houses should not encroach visually on neighbouring properties to avoid the appearance of "over-development" or "terrazing", nor should they intrusively overlook or shade neighbouring properties.

These matters should be handled by the current planning policies at the time the application is being made and on the individual merits of the application.

KR05 Extensions and subsidiary ancillary buildings should complement the existing house style and materials likewise. Brickwork, tile hanging, roof tiles, half timbering and matching window/front door styles should all be incorporated into the new works, sympathetic to the existing house.

This again assumes the Heritage Officer and Planning Officer are unable to apply their expertise at the time of making the decisions and is far too specific for planning policy.

KR06 Garages, including where accommodation is incorporated over, should be in a similar style to the main house or of a rural style e.g. Kentish wooden barn.

Again, too specific and will be handled by planning policy.

KR07 The natural cover including hedges, trees, shrubbery between houses and the shielding of buildings from the road shall be retained together with the avoidance of solid fencing and excessive hard landscaping.

Again, too specific and will be handled by planning policy.

KR08 Hard standing at the front of houses in the Estate should be kept to a minimum and any hard landscaping should complement the overall character and setting.

Again, too specific and will be handled by planning policy.

KR09 Large front metal and solid wooden gates, set between brick piers, should be avoided. Five-bar oak wooden gates, as defined in the original 1925 documents, remain the much preferred option in order to maintain the rural idyll objective of the Estate. Boundaries fronting roads should be formed of natural hedging.

"Much preferred" – by whom? How can future interested parties be dictated to by the authors on such specific matters?

KR10 The existing entrance/driveway locations shall be retained.

This is a classic example of the authors attempting to keep what we have now with no ability for it to evolve in the future. How can we say that every entrance / driveway is currently in the best possible location with no scope for future changes if it is deemed appropriate in the future? Clearly also far too specific.

KR11 New/relocated/additional entrances are not permitted in the private roads as both the
Roadway and verges are owned and maintained by the respective Road Trustees.

As above for KRO10.

KRO12 Tennis courts, swimming pools, large garden buildings should be sited out of view from the road and located such that they cause minimal intrusion on neighbouring properties. Similarly exterior lighting of all forms shall be designed to minimise overall light pollution and intrusion on neighbouring properties in accordance with policy EN6.

Again, this assumes that future generations of decision makers are unable to make sensible decisions and need to be dictated to now on the basis the authors feel they cannot be trusted.

This whole document has the feel of parties determined to live in the past and unable to cope with a changing world. Planning and heritage officers have years of education and experience to make the right decisions that are appropriate at the time of making those decisions. What right do the authors have to dictate terms for future generations? NONE. THIS DOCUMENT SHOULD BE REJECTED.

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<table>
<thead>
<tr>
<th>Gordon and Lesley Sangster</th>
<th>Dear Sir,</th>
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<tbody>
<tr>
<td></td>
<td>Wildernesse Design Statement</td>
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<tr>
<td></td>
<td>As residents of Wildernesse, we are writing to confirm our support of the Wildernesse Design Statement.</td>
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<tr>
<td></td>
<td>Yours faithfully</td>
</tr>
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<td></td>
<td>Gordon and Lesley Sangster</td>
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630875  28 June 2018
The Arts and Crafts Movement in Surrey (Denise Todd)  

For attention of the Planning Officer

The Society for the Arts and Crafts Movement in Surrey was established in 1996 and exists to celebrate and foster interest in all forms of art, architecture and design of the 'Arts and Crafts era' – the period from 1870 to 1930. The Society is concerned with the conservation and the promotion of awareness of works associated with the period.

In July 2017, twenty six members of the Society attended a visit to the Wildernesse Estate where we were able to explore on foot the unusual setting that the Estate offers and, thanks to the generosity of local residents, we were able to view five or six private houses which were designed, or in one case influenced, by H M Baillie Scott. In some instances we were able to view the interiors of the houses and gain an appreciation of the quality of the Arts and Crafts architectural design and of the craftsmanship displayed in their construction.

The Wildernesse Estate is a residential estate of some 40 hectares served by private roads which was laid out in the 1920s on the eastern side of Sevenoaks. The Estate was conceived as a composition of fine houses in an open, spacious, landscaped setting. Strict legal controls were put in place to ensure that these concepts were carried out and retained and those covenants have continued to support high standards of design quality and spaciousness and the retention of hedges and woodlands. That the original scheme of roads and plot layouts remains today, together with a large proportion of the original Arts and Crafts houses and two significant gardens, is noteworthy. Our Society is aware that a very large proportion of the original houses of the Estate were designed by leading Arts and Crafts architects, including M.H. Baillie Scott, with some 14 houses designed by this famous architect alone, one being Grade 2 listed.

The Wildernesse Estate duly merits the Conservation Area status achieved in 2003. However, as we noted when we visited Hampstead Gardens Suburb in 2004, Conservation Area designation may only offer a certain amount of protection to the heritage and ambience of a garden estate, or garden suburb. Our attention was drawn to the sixty page publication:

Hampstead Garden Suburb

The Care and Appreciation of its Architectural Heritage

A treatise by the Hampstead Garden Suburb Design Study Group

Compiled and written by Alfred W Lester RIBA

With foreword by Sir Nikolaus Pevsner

Published 1977 reprinted 1981 by the Hampstead Garden Suburb Design Study Group 5 Reynolds Close London NW11

This deals with a whole range of issues from alterations and updating, features such as roofs, windows, brickwork repairs, painting and ironmongery to landscaping, hedges, trees and roads. The identification of issues that may arise and the existence of guidelines and practical solutions to changes is essential to avoid any gradual erosion of the heritage of such estates. Having seen the need for such a document at Hampstead Garden Suburb, and also at other examples that we have visited, eg the Webb Estate, Purley, our Society fully supports the introduction of the:-

Wildernesse Estate Sevenoaks Design Statement February 2018

28 June 2018
We consider the Statement a vital and important document that should be adopted by Sevenoaks District Council.

On behalf of The Arts and Crafts Movement in Surrey and the Twenty-six Members who visited the Estate last year.

Kind Regards

Denise Todd Hon Secretary

The Arts and Crafts Movement in Surrey 01252 715807
www.artsandcraftsmovementinsurrey.org.uk [http://www.artsandcraftsmovementinsurrey.org.uk/]

Toby Thompson

OVERVIEW

I feel that emphasis Wildernesse Estate Design Statement (WEDS) should be on quality of design and build which will allow the preservation and evolvement of Wildernesse conservation area. I believe draft WEDS as submitted to SDC was opinionated, backward looking and sadly prescriptive.

Like many, I appreciate the character of Arts and Crafts and believe strongly, that those who wish to build new Arts and Crafts houses, should be free to do so, but, we should not compromise the enhancement of Wildernesse conservation area in the process by prescribing any one style. I am also of the opinion in some cases (specified later) that the WEDS is misleading.

KROs

I believe that some of the KROs impose unnecessary restrictions that stifle the long-term sustainability and enhancement of the conservation area.

KRO3 "Extensions and replacement houses should follow or be designed to be in harmony with the Arts and Crafts style of the original Estate."

This should be removed because it is regressive - I propose instead that 'extensions and..."
Replacement houses should be of high-quality, innovative design that are forward thinking and progressive (in similar vein to the 1930s architects of the time that many homes were built but are now out-dated); thereby the housing stock would naturally become replaced and updated over time; this would enhance the conservation area by keeping it fresh and highly-desirable in keeping with both the conservation area appraisal management plan and the original aims of the estate development which is sought to be conserved.

KRO5 "Extensions and subsidiary ancillary buildings should complement the existing house style and materials likewise. Brickwork, tile hanging, roof tiles, half timbering and matching window/front door styles should all be incorporated into the new works, sympathetic to the existing house."

I propose instead that 'all new development should enhance and complement the existing traditional style and add value to the high-quality feel of the estate through modern technologies and cutting-edge building materials that are environmentally-friendly and ecologically sustainable. It is essential in my opinion that if we wish to preserve the conservation area we must embrace development and the building of new buildings representative of today's building standards and illustrating cutting-edge (not necessarily new style) architectural practices.

KRO9 "Large front metal and solid wooden gates, set between brick piers, should be avoided. Five-bar oak wooden gates, as defined in the original 1925 documents, remain the much-preferred option."

Metal gates and brick pillars are seen widely across the estate - these have been sought and installed. Five-bar oak wooden gates have been continuously removed and are now represent less than 20% of the entrances. This KRO is not credible, it should be removed; Clearly most residents wish to move away from five-bar gates; to enforce a style which is so clearly unwanted is wrong.

KRO11 "New/relocated/additional entrances are not permitted in the private roads as both the roadway and verges are owned and maintained by the respective Road Trustees."

Road trustees who act upon the behalf of individual roads own their respective verges - this has nothing to do with WEDS, it should be removed; the relocation of entrances is entirely the domain of road trustees and have / should continue to be considered by trustees on a case by case basis.

MISLEADING STATEMENTS

"The very large proportion of the original houses, many designed by leading Arts and Crafts architects, including M.H. Baillie Scott (14 houses designed by this famous architect alone, one being Grade 2 listed) remain in their very largely original form to this day, with updating having been undertaken in an in-character manner."

The underlined part of the above statement is incorrect. The estate is interesting, unique and of architectural merit and has conservation status because it is diverse; very many styles which add value and interest and contribute to the feel of the estate - it would be hugely detrimental to the conservation area if style were to be limited to any one style, especially one that is currently out of favour due to low ceiling heights (hitting heads), reduced window size, sloping walls not accommodating furniture and is generally seen as out of keeping with modern expectations.
Replacement houses and extensions have generally retained the predominantly Arts and Crafts style, which varies with each individual house. The external characteristics include Kentish bricks, oak beams and doors, leaded lights, clay tile roofs and tile hanging.

The underlined part of the above statement is incorrect. It is not correct that replacement houses and extensions have been of Arts and Crafts style, nor is it desirable for them to be so. The estate has conservation status because it is hugely diverse variety of high-quality architecture from all style types in spacious plots. No individual style should be prescribed or seen as favourable to any other; were it to be so - the estate would become boring, prescriptive and bland.

If you walk down Parkfield, you would not recognise many houses that fit the above 2 descriptions; instead you would see a number of new houses that enhance the road because they are high-quality architecture, unique and individual.

When "The Summer House" in Parkfield was built, many felt that because it was not Arts and Crafts it was "out of character". "The Summer House" is now viewed as an asset to the estate.

The DS is dominated by photos of Arts and Crafts houses predominantly in Woodland Rise, if photos are to be shown at all, they should show a similar number of photos of new and diverse builds which enhance the character of the estate. The estate has evolved away from Arts and Crafts because that is no longer representative of the highest quality build style - building preferences will continue to evolve and should be encouraged to do so, this would enhance the conservation area by keeping it fresh and a highly desirable place to live; should houses not be encouraged to evolve over time the estate will become tired as it loses favour of new residents - in time houses may fall prey to developers who may seek to divide the plots and reduce the feeling of space and quality that typifies the conservation area.

I understand that the Wildernesse conversation area management plan aims to

* manage change to ensure local distinctiveness, not prohibit development.
* encourage high quality / innovative design in new development which preserves and enhances the conservation area.
* encourage development that reflects local identity and distinctiveness.
* encourage sustainable development which conserves the area for the long-term.

I do not agree with the sentiment in the draft design statement that Arts and Crafts style should dominate the conservation area; it is my opinion that variety of style is a key characteristic of the estate's charm.

SUMMARY

Moving forward, the emphasis of development must be on quality, diversity, ecological and archaeological merit. Redevelopment of properties of no architectural merit should be encouraged.

We must continue to preserve and enhance the Wildernesse conservation area but not create an environment where un-wanted stock could become a field day for developers wishing to over-develop. It would be wrong to allow a design statement that restricts evolution in line with expectations; to do so would be style policing and a dereliction of duty to the health and natural progression of this most special estate. One characteristic of the estate is the diversity of stock; giving preferential development to Arts and Crafts style would be narrowing the interest and
relevance of the conservation area.

The Conservation area is not just for those here now, it is also for future generations, it is essential in my opinion that the design statement is supportive of appropriate change which focuses on high-quality, variety and innovative design with an ecological focus.

28 June 2018

We strongly feel that this proposed Wildernesse Design Statement should be withdrawn and a new, more progressive, forward thinking statement created from scratch.

First some general matters will be addressed and then comments on each individual KRO.

* GENERAL MATTERS

The Wildernesse Estate is a spacious and special enclave and we feel privileged to own a property here.

* Covenants

The main focus of the WRA should be to enforce the covenants, the 2 main ones being:

* One house per plot
* No building closer than 75 feet from the road.

These are the two most significant contributors that have kept the estate rural in feel and have prevented it from feeling over developed. The importance of these covenants cannot be overstated as can be seen by the difference with the Kippington area of Sevenoaks which, despite also being a conservation area, now sadly feels completely over developed.

* WRA should not be style police, but should offer some guiding principles.

The WRA should not be overly prescriptive or impose their views regarding design, materials, etc on residents. Imposing a set of specific design criteria that is not progressive and forward thinking, does not consider the long term future of the estate. The Estate was set up in 1925 and has been a wonderful place to live. We should now be looking forward to the next 100 years and making sure that the houses which are newly built/renovated will be suitable for generations to come, whilst still preserving the rural character of the estate. This would be better served by a set of guiding principles, rather than specific design points.

These principles should allow the expectations of high quality, modern, well designed homes to be brought into the building and development of the housing stock on the estate, whilst still retaining the rural feel of the Estate. To use design statements to mainly PRESERVE the housing stock, as the current statement does, will be detrimental to ensuring the estate is a premier estate in the future.
Many houses on the estate have been around for a significant number of years, some since the 1920s and they are no longer suitable as family homes appropriate for modern living, particularly in an estate such as this which is at the high end of the market. This will only become increasingly problematic as the years progress. Most plots on the estate are very large and could easily accommodate significant homes, without being intrusive upon neighbours and without losing the rural feel of the estate - providing these homes are well designed and complement both the rural feel of the estate and the prevailing arts and crafts design of the estate.

It appears that instead of looking forward to the next 100 years of the Estate, to date, there has been a tendency to look backwards and to try to shoehorn a 'modern' family home into fitting in with preserving old homes which are no longer fit for modern high quality living purposes. This can lead to the creation of poorly designed, unattractive extensions (whether pastiche or not) which reduces the value and merit of the estate. Several senior, local, highly regarded estate agents are of the view that the current prescriptive rules that govern the ability to rebuild and renovate in the estate are, in fact, devaluing properties here due to the fact that the houses do not and cannot meet the requirements for modern quality family living.

* Houses 'contributing to the character' of the Conservation Area

The significant majority of the houses in the estate have been marked as 'buildings contributing to character' of the Conservation area on a map at the back of the Wildernesse Conservation Area Appraisal and Management Plan – Planning Guidance 2010. This document is available to view online.

Despite what some residents (including, it seems, David Moscow, from his comments at the WRA meeting on 25 June 2018 when he said that being marked as contributing to character is only one of several criteria that planning officers will consider when assessing demolition and rebuild) may think, this arbitrary marking/designation means it is virtually impossible to replace any building that is marked as 'contributing to character' and the automatic assumption is it must be retained and extended. Planning and Conservation Officers use this marking as a default mechanism when assessing planning applications and automatically object to replacements of any building marked as contributing to character. Why would they 'stick their necks out' to reverse this presumption? It is far easier for them to say the house cannot be replaced and hence the marking becomes a default mechanism. This is well known by architects and planners in the area.

This presumption to extend and refurbish forces residents to take a house that is often already unattractive (and several of these marked properties are not even in the arts and crafts style, despite this category being so broad) and extend it, which often creates an even more unattractive home which then has an impractical layout, unsuited to modern living. In fact, one of the 'sympathetically extended' houses pictured in the proposed Design Statement has been on the market for a long time but according to local agents has not sold largely due to its impractical layout. Do we want a Wildernesse Estate that diminishes in value once more houses are forced to be extended in such a way?

The mere fact that a house has been around for a long time, should not in itself mean that it should remain as the best way to contribute to the character of the estate. It is possible to enhance the character of the estate by allowing rebuilding. Each building should be regarded on its own merits, as a better end result could be produced by rebuilding a house sympathetically from quality materials that better suits modern living and future proofs the estate, rather than poorly extending an existing unremarkable building.
* How were these houses marked as contributing to character?

Evidence should be discovered and assessed to find out how so much of the estate has been marked as contributing to character. Questions that should be explored include:

* Who made the original determinations?
  * The council have clearly adopted the list but was it the WRA that initially collated a list to give to the council?
  * What criteria were used for assessment?
  * Who was consulted?
  * Was professional advice taken to discover the history of each house?
  * Were residents given the opportunity to comment or was this list pushed through quietly without residents being made aware, in the way the proposed Design Statement almost was?
  * From the WRA meeting on 25 June 2018 it sounded very much as if the WRA had a hand in deciding which houses could come off the list and which should be added – did they consult with the residents regarding this? Did they consult with professional such as Heritage Consultants?
  * How did they make these determinations?

Whilst this may have begun as an 'innocent' designation, it has effectively been adopted as law in planning circles and it appears these original decisions were largely made subjectively and without criteria or merit. This marking is now one of, if not the, most influential factors in whether a house can be rebuilt or retained.

We, like several other residents, feel that many of these marked properties do NOT in fact enhance the character of estate as they are already unimpressive, unattractive and poorly designed and they have therefore been incorrectly designated as ‘contributing to character.’

This is the time for the WRA to review these previous decisions and take this opportunity to future proof the estate, whilst at the same time protecting its unique rural feel.

* The WRA should take a balanced, progressive approach

We, probably like most residents of the Estate, certainly do not want a Wildernesse Estate full of boxy Georgian mansions and strongly feel that this would detract from the rural character of the estate. However, we do feel that a balanced view should be taken and there should not be an automatic assumption that houses in the estate that have been marked on a map as ‘contributing to character’ cannot be replaced – providing that the replacement houses are well designed, use good quality materials and fit the flavour and feel of the estate.

The WRA should seize this opportunity to think progressively, so that going forward residents can build well designed, future proofed, eco-friendly, energy efficient, high quality homes that are fit for current and future family needs, yet are still in keeping with and don't detract from the unique rural feel of the estate. This is definitely preferable to retaining and extending original houses which offer no architectural merit.

We should be preserving some buildings that have significant historic value, ie houses designed by Baillie Scott are clearly important from a historical perspective, but demolition and rebuilding of the other existing housing stock should be allowed.

* A progressive design plan should be created that:
* defines the character of the estate for the future – a common sense, forward thinking approach should be taken to ask what exactly is it that we want to preserve for the future.

* fully reviews the houses in the estate that have been marked as contributing to character to see if they are genuinely in line with what should be preserved. Do they have historic significance? Do they enhance the estate? If so, how? Are they attractive and well-built or could a well-designed replacement better enhance the estate? If the latter, then this can be left to individual planning officers to determine, without them being effectively forced into making a presumption of retention.

* could be more prescriptive about the allowable size and spacing of future dwellings and developments, as preserving green spacing and the open rural feel of the estate is critical.

* states that new builds and renovations should be in keeping with the rural nature of the estate so we avoid the estate becoming like Kippington/Philippine Shaw/Wentworth.

* COMMENTS ON INDIVIDUAL KROs

Despite our feeling that the proposed Wildernesse Design Statement should be withdrawn, to assist with any future document, we have also provided below comments on the current proposed KROs.

KRO1 Extensions should not exceed the height of the main house. They should not be disproportionate to the main house, so that it retains a similar scale to neighbouring houses.

Disagree. The height of extensions should NOT simply be determined by the height of the existing house. Whilst there could be an indicative cap on the height of extensions and renovations, consideration should be given to the height of other properties in the estate, neighbouring properties and the needs of modern living.

Care should be taken to ensure the height does not dominate the landscape (as mentioned in the earlier design statements).

KRO2 Replacement houses, where the original does not contribute to the Conservation Area, should be of similar height and scale to neighbouring houses.

This contradicts KRO1 by saying the height of a replacement house can be higher than the original house, but the height of an extension cannot be higher than the original house.

Again, there could be an indicative cap on the height of new builds and consideration should be given to the height of other properties in the estate, neighbouring properties and the needs of modern living.

Care should be taken to ensure the height does not dominate the landscape.

KRO3 Extensions and replacement houses should follow or be designed to be in harmony with the Arts and Crafts style of the original Estate.

Agree.
KRO4 Extensions and replacement houses should not encroach visually on neighbouring properties to avoid the appearance of "over-development" or "terracing", nor should they intrusively overlook or shade neighbouring properties

Agree.

KRO5 Extensions and subsidiary ancillary buildings should complement the existing house style and materials likewise. Brickwork, tile hanging, roof tiles, half timbering and matching window/front door styles should all be incorporated into the new works, sympathetic to the existing house.

Agree that extensions should complement the existing house, BUT there is no need for this level of detail and for all of these items to be sympathetic to the existing house, especially for ancillary buildings.

KRO6 Garages, including where accommodation is incorporated over, should be in a similar style to the main house or of a rural style e.g. Kentish wooden barn.

Garages, including where accommodation is incorporated over, should complement the main house or be of a rural style.

KRO7 The natural cover including hedges, trees, shrubbery between houses and the shielding of buildings from the road shall be retained together with the avoidance of solid fencing and excessive hard landscaping.

Agree.

KRO8 Hard standing at the front of houses in the Estate should be kept to a minimum and any hard landscaping should complement the overall character and setting.

Agreed. Would take this further and say there should be no building or hard landscaping on the grass verges.

KRO9 Large front metal and solid wooden gates, set between brick piers, should be avoided. Five-bar oak wooden gates, as defined in the original 1925 documents, remain the much preferred option in order to maintain the rural idyll objective of the Estate. Boundaries fronting roads should be formed of natural hedging.

Agree that the boundaries fronting roads should be formed of natural hedging.

Disagree regarding gates. Young children, pets and security should be considered here and a practical view taken. We are no longer living in 1925 and these days security issues must be considered, and this is likely to become an increasing issue in the future.

Five bar gates are simply not as effective from a security perspective as metal/wooden gates, and residents are entitled to expect to be able to secure their plot to keep intruders out and pets and children safely in. Metal and wooden gates can be designed so as not to detract from the rural feel of the estate, whilst still providing security.

KRO10 The existing entrance/driveway locations shall be retained
Disagree. Why should this be the case? Owners should be able to move the driveway entrance providing it doesn't detract from the rural feel of the estate. Providing the new entrance/driveway location is non-intrusive and the verges are re-instated, their location should not matter.

KR011 New/relocated/additional entrances are not permitted in the private roads as both the roadway and verges are owned and maintained by the respective Road Trustees.

Disagree. New/relocated/additional entrances should be permitted by agreement with the respective Road Trustees.

KR012 Tennis courts, swimming pools, large garden buildings should be sited out of view from the road and located such that they cause minimal intrusion on neighbouring properties.

Agree.

Similarly exterior lighting of all forms shall be designed to minimise overall light pollution and intrusion on neighbouring properties in accordance with policy EN6.

No need to state this point regarding light pollution in the Design Statement.

We are residents of the Wildernesse Estate and have been since 2004.

We have a great many concerns about the Wildernesse Estate Sevenoaks Design Statement February 2018 in both style and content.

We were not involved in aspect of its drafting or submission and think that it does not reflect our views on the Wildernesse Estate.

The whole document is much too backward looking, prescriptive and restrictive on how future development should be carried out. As much as the style and character must be preserved it cannot be wrapped in an historical time bubble and not embrace technological and social change. When the Estate was first devised CCTV, electronic gates, solar panels etc., were neither known about or seen as necessary whereas now these are now readily embraced and should be included in any forward looking document.

We think that including a few pictures of unrepresentative houses from the estate is unhelpful as it does not represent the wide variety of styles included within the estate.

Turning to the Key Requirements and Objectives (KRO)

KR01 There are many current examples of neighbouring house of dissimilar size so this KRO appears redundant.

KR02 similar comments to KR01

KR03 There are many house on the Estate that do not satisfy this requirement which therefore makes it redundant.

KR06 This is over prescriptive.

KR07 Solid fencing should be allowed for the protection of pets from escaping.
We assume the 18 is a typographical error.

As many houses currently have metal gates set between brick piers this KRO appears redundant.

As there is a requirement for hedges trees and shrubbery to shield the house from the road it appears un-necessary to further restrict leisure facilities to be sited out of view.

We trust that these views are helpful in your deliberations regarding the finalisation of the Wildernesse Estate design Statement

Gareth Williams

The first thing I wish to record is how privileged and fortunate I feel to be living in such a beautiful area as the Wildernesse Estate. It is due to the dedication and hard work of the Trustees of the various roads and the Wildernesse Residents association that this area has retained such a distinctive character.

It was therefore a negative surprise that a Design statement had been completed and submitted to the council without the appropriate consultation with Wildernesse residents. It felt like a small group were seeking to impose their views on any future developments on the Estate. This did not seem consistent with past behaviour that I had experienced by the WRA and it has since become clear that a number of Committee members had fundamental disagreements about this approach.

There is much to commend in the Design statement but I believe it has one fundamental false. It seeks to keep any future developments, including extensions, garages etc rooted in one particular style. I am in favour that the broad development style should reflect the Arts and Crafts style of the original houses. But there has to be room for modern architectural expression that complements that style to be considered and approved. This has been done by Sevenoaks planning authorities in a number of cases.

Consequently, I feel the aggregation of the statements in the document represents too restrictive a framework, one that stifles architectural creativity that could be entirely in keeping with the feel

629211 29 Jun 2018
of the Estate and therefore I do not support it as currently drafted.

I repeat that I am very keen to support the integrity of this beautiful place in which we all live but there must be room to move design forward thoughtfully and empathetically as the Estate continues to develop.

Thank you for the opportunity to participate in this consultation process.

Dear Sirs,

RE: Objection to the Wildernesse Design Statement

I am writing in my capacity as an agent for Mr and Mrs Bakunowicz at [REDACTED] in response to the current consultation for the Wildernesse Design Statement (the WDS).

I would like to make it known that I object to the current version of the above-mentioned document due to its prescriptive nature, concerning materiality and design as set out in the key requirements and objectives KRO1-12. Matters such as these are better handled on a case by case basis upon submission of a scheme for planning permission, furthermore much of this information is already covered in the Wildernesse Conservation Appraisal.

The report does not contain any evidence of independent technical guidance that one would expect to find in a document which is to be given such weight in determining the development of a highly revered conservation area.

The WDS was referred to by the council’s conservation officer, Rebecca Lamb in our Pre-Application response (via email from Louise Cane emailed on the 03.06.18) “as a good place to start analysing the local distinctiveness”. However, most of the information contained in this document has been taken from the Conservation Area Appraisal, which reflects the calibre of documentation one would expect from the council.

We have consulted the Victorian Society, The Society for the Protection of Ancient Buildings (the SPAB) and the 20th Century Society.

Whilst neither the Victorian Society of the SPAB can formally consult on WDS due to the timeline of properties falling outside of their respective areas of casework the have voiced concern,

please see emails attached. The 20th Century Society are yet to make a decision as to whether they will comment or not.
In response to my email, the SPAB director, Matthew Alocombe, author of the SPAB Approach published in 2017 (a copy of which is attached) suggested the following is drawn to the council’s attention:

"Good design to complement the old

The Society recognises that, from time to time, old buildings may need sympathetic alteration, adaptation or extension to ensure their continuing usefulness. There are occasions, the SPAB Manifesto argues, when it may be better to leave an old building unaltered and to build a new one if the adaptation required would involve serious damage. These cases are the exception. Generally, modest, sympathetic new works allow continuing life for old buildings and can contribute positive to their interest and story. Further alterations and additions, the Society believes, are best when they complement what exists. They should not compete unduly with the old building in form or position; nor should they mimic the original or pretend to be historic. They should fulfil modern needs in a way that respects both the old building's form and context. The new should not harm the old where they meet, nor create problems with future maintenance."

The SPAB stand in opposition to pastiche, which the WDS presents through its use of prescriptive design and selective imagery captioned as "Examples of Houses that have been Sympathetically Extended". As the approach that underpins UK heritage legislation and has influenced conservation worldwide, its principles should be noted and present within the WDS.

"The SPAB Approach" provides readers with an excellent overview of conservation and I would highly recommend that all involved in the production of the WDS take note of its contents.

Below is a summary of elements taken from The SPAB Approach that are pertinent to the WDS:

Understanding - The SPAB Approach calls for an understanding of history, design and construction in order that well-considered decisions can be made. The construction of a building amounts to choices made at a specific point in time, elements that make up the whole need to be explored and assessed as changes have the potential to add value or cause damage.

Respect for Age - A special consideration should be given to what may be seen as signs of age as this help maintain the integrity of a building. An oldness of a 'historic' building.

Repair Not Restoration - Ruskin and Morris opposed restoration that set out to turn back the clock or to recreate the past. It can strip a building of age and past interaction with people. Knowledge of an original design is not sufficient for erasing later changes, the Society does not believe that damaged or missing elements need be replaces unless there is functional need. "Reinstatement for the sake of tidiness, or to recreate historic design or detail is at odd with THE SPAB APPROACH".

Materials - It can be best for new materials to match the old to ensure compatibility of the building fabric. However, the use of alternate materials may be more fitting for effective allowing better retention of historic fabric and also allowing for intervention to be easily recognised. The society tends not to encourage the use of reclaimed materials which have been taken from another building as these materials can confuse an old buildings history.

Matthew also makes reference to the draft version of the new NPPF which he feels will be more relevant to the council which states:
130. In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they are sensitive to the overall form and layout of their surroundings."

The WDS is its current form makes no reference to innovative design, sustainability or standard of design, given the status of the area and affluent nature of its residents one would expect this document to present the possibilities of an improved environment.

Additionally, Matthew commented that English Heritage should vet and comment on the WDS. I look forward to reading Robert Lloyd-Sweets's comments once made available at the end of this consultation.

Tom Taylor from the Victorian Society agrees that the WDS places limitations on development and says, "The detailed specifications seem unnecessarily restrictive, and fail... to take into account the possibility of new architecture."

In short, I object to the WDS in its current format as it fails to provide design professionals and residents with supplementary information and instead relies heavily on information already available in the Conservation Area Appraisal. Additionally, key points and objectives referred to in the document are overly restrictive, stifle creativity, are contrary to the draft NPPF, the SPAB Approach and fail to demonstrate technical (expert) influence.

In light of the way the WDS was presented to the council (on behalf of the committee but written by an individual) and my aforementioned points I think the WDS should be withdrawn and another more representative and technically informed document produced, assuming that the council feel the current instruments of the NPPF, new Local Plan, Wildernesse Conservation and The Kent Design Guide are insufficient for the purposes of decision making.

I look forward to reading the responses to this consultation in their entirety once made publicly available.

Yours Faithfully,

Natasha Bennett ARB RIBA BA(Hons) MA
On behalf of ArchiLab 7 Ltd

Email from Matthew Slocombe

'Dear Natasha,

Many thanks for your message, which Mary has passed to me for further comment.

The date of the Wildernesse buildings place them firmly outside the Society’s period for casework comment (which stops at 1720) but we have complete sympathy with your views on good new design for the area. Our position is set out in the SPAB Approach, published 2017, which can be quoted to the council if you feel it would help.

Good new design to complement the old
The Society recognises that, from time to time, old buildings may need sympathetic alteration, adaptation or extension to ensure their continuing usefulness. There are occasions, the SPAB Manifesto argues, when it may be better to leave an old building unaltered and to build a new one if the adaptation required would involve serious damage. These cases are the exception. Generally, modest, sympathetic new works allow continuing life for old buildings and can contribute positive to their interest and story. Further alterations and additions, the Society believes, are best when they complement what exists. They should not compete unduly with the old building in form or position; nor should they mimic the original or pretend to be historic. They should fulfil modern needs in a way that respects both the old building's form and context. The new should not harm the old where they meet, nor create problems with future maintenance.

Probably more directly relevant to the council will be the NPPF. The draft version of the new NPPF is actually quite helpful on design issues. It says (indraft form):

130. In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they are sensitive to the overall form and layout of their surroundings.

In addition, Historic England (Guildford) should vet and comment on Plans and would be worth contacting.

We hope this helps.

Kind regards,

Matthew

Matthew Slocombe
Director

Email from Tom Taylor

'Dear Natasha,

Sorry it has taken so long to get back to you, and thanks for sending me this draft document. I think we would be interested in offering Sevenoaks Council our advice, although we must retain our independence in this matter.

My first impressions are that the document is a rather blunt instrument. It is not clear that any of the proposed requirements and objectives put forward considerations that would - or should - not be put forward anyway in any consideration of planning or LBC applications in a conservation area. The detailed specifications seem unnecessarily restrictive, and fail, as you say, to take into account the possibility of new architecture.

We are based in Bedford Park and I'd be interested to think a little more about parallels - to find out how the Bedford Park conservation area works, as I think it also has rather restrictive rules on new interventions. I also want to sound out my colleagues and out director before drafting a written response. I should be able to do this next week and get letter together before the consultation deadline.'
As a resident of Wildernesse Avenue, I have the following comments on the Wildernesse Estate draft Design Statement:

1. I believe a well-constructed and properly balanced Design Statement would be an important aid in ensuring appropriate development in the Wildernesse Estate and maintaining the quality of the environment in the Conservation Area.

2. The current draft has some merits but also a number of weaknesses, which make it inappropriate as it stands. It does not adequately reflect the balance of existing planning documents relating to the Conservation Area, which recognise the need for appropriate modernisation of properties alongside necessary safeguards and limits on development. (The existing documents in fact acknowledge that much successful modernisation has already taken place.) This can be rectified by suitable changes to the section on 'Overall Character Appraisal' and to specific KROs. The Design Statement should reflect existing planning requirements – not strengthen or weaken them.

3. The Design Statement should recognise that there are a large number of houses which are not truly 'Arts and Crafts' in style, but which satisfactorily blend in to the Estate. The 'Arts and Crafts' heritage should be recognised, but the current draft over-emphasises this heritage in the 'History', 'Overall Character Appraisal' and 'KRO' sections.

4. The Key Requirements and Objectives (KRO) section requires a number of changes:

   - KRO 1 should be rewritten to say that an extended house should simply be of similar scale to other houses on the Estate. It should not comment on the size of extension in relation to the main house or neighbouring properties. The current wording raises a number of difficult issues of...
judgement depending on the nature of the house and neighbouring properties, particularly since
the latter may vary considerably in size.
- Similarly, KRO 2 should refer to other houses on the Estate, rather than specifically to
neighbouring properties, for the same reasons given for changing KRO 1.
- KRO 3 should say ‘designed to be in harmony with the style of the present Estate’, removing the
reference to ‘Arts and Crafts style of the original Estate’. The Estate has already moved on from
the original Arts and Crafts style and it is not appropriate to try to turn the clock back.
- KRO 5 should not include the second sentence. The first sentence covers all that is required.
The second may not be appropriate for many houses which do not necessarily include all those
features.
- KRO 6: this should end after the words ‘main house’. The reference to rural style is unnecessary,
potentially inappropriate, and should be deleted.
- KRO 8 should be deleted. The point is already covered in KRO 7.
- KRO 9 is completely unacceptable as it stands – it is totally out of line with the existing estate.
Almost all houses in Wildernesse Avenue have metal gates set between brick piers. The KRO
should simply say that entrances or gates should blend in with those on neighbouring properties.
It should also retain the last sentence on boundaries fronting roads being formed of natural
hedging.
- KRO 10 should simply say the use of existing entrance locations, rather than new
ones, are encouraged. A blanket ban on change is not appropriate since it is not possible to forecast what
circumstances may arise in future to justify a change.
- KRO 11 should be deleted. It is largely a repetition of KRO 10 and trespasses on the business of
Road Trustees which is not an SDC planning matter.

I hope these comments can be reflected in an amended and improved Design Statement.

Regards, Peter Calvert

Helen Hawes

We think first and foremost the Design Statement should protect the covenant of one property
per plot. We would also like to emphasise the importance to protect the privacy of all home
owners on the Estate by enforcing future extensions/alterations/knock down rebuilds are built
away from neighbouring properties and boundaries. Everyone has a good sized plot, a majority
being in excess of an acre, which makes it particularly appealing to set up home here as it offers
something that nowhere else in Sevenoaks does. We would aggressively contest a large
construction overlooking our less contentious family home but if it was hidden away in the middle
of its own grounds and no sign of it from the road or other houses, then we don't have a problem
with it. This would only be achievable for a select few owning particularly sizeable plots so I would
like the Design Statement to enforce building restrictions with privacy/overlooking / one house
per plot as its primary objective. The actual design and style of house should then, in our opinion,
be a decision for the relevant owner; although we prefer to own a house in keeping with the
1930's elevations which were originally built, we also understand it is not our place to dictate to
others the style of house in which they wish to live through an overly restrictive design statement.
We completely understand the view that your property is an asset that should be enhanced and
upgraded to embrace the demands of maybe younger families or those just wishing to make
more modern home improvements, provided it is not at the expense of others enjoying their own
home.

630891 29 June 2018
Dear Simon, Hannah and team

Thanks for answering so many questions over recent weeks re the Wildernesse Design Statement.

Please find collated comments and views. (some are a combination of many on Parkfield).

The attached is probably the easiest.

Best wishes Carrie Thompson

Document attached with proposed changes and comments

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To whom it may concern:

Thank you for consulting Historic England on the suite of Village Design Statements below. As these relate to a number of conservation areas and include areas containing several listed buildings these are of interest to Historic England. Our comments are without prejudice to comments we may wish to make unspecific current or future development proposals.

On the whole, these documents are well researched and take a pragmatic approach given the different scale and complexity of the areas addressed. As a cautionary we note, we would highlight that these documents should not introduce policy in themselves but are supplementary to policies, within the Local Plan and, potentially, future Neighbourhood Plans. Nevertheless the information presented, including collected views of local people, or recorded pressures on highways and services, may be informative to future policy preparation. We note that the St Lawrence VDS includes an extensive list of the existing policies that the influence design of new development already contained in the Local Plan and would consider this a helpful addition to the other plans as a useful reference for applicants.

We particularly appreciate the consideration of the relationship between each village and its rural setting, including care needed in proposals that could affect key views out to surrounding landscapes or where buildings might become prominent in views.

We note that the Wildernesse statement is a shorter document and, may appear rather brief. However, we feel this sensibly avoids repeating the detail contained in the conservation area appraisal, which remains an important source of evidence on the area's character and architectural interest. As such we feel this aids its accessibility to users, although it might helpfully include an advisory note that users should also consult the appraisal in formulating proposals.

Whilst the present NPPF does state that some control of the use of particular architectural styles may be appropriate where it is necessary to protect local distinctiveness, we note that this approach is not supported in the draft NPPF and, as such requirements to adhere to a particular architectural style may not be appropriate. Nevertheless, we feel that the Wildernes VDS, which states that extensions or replacement houses should be 'in harmony' with the Arts and Crafts style that characterises the conservation, is a sufficiently flexible statement to allow innovative use of design and materials that can still respond positively to the local character and fulfill the requirement preserve or enhance the conservation area's character or appearance (as
Dear Planning Policy Team,

Thank you for inviting Natural England to comment on the draft Village Design Statements (VDS) for Seal St Lawrence, Wildernesse Estate and Westerham. I provide my comments for each VDS in turn below.

• Seal St Lawrence
We welcome recognition of the parish’s location in relation to the Kent Downs Area of Outstanding National Beauty (AONB), and the protection this affords the area. As a continuation, it is important that the Kent Downs AONB Management Plan is clearly referred to in the VDS. Paragraph 4.9 signposts national and local policies on development in the AONB, which is relevant. However, direct reference to the AONB Management Plan is left to the Appendix, where it is included within the wording of Policy SP1. There is no mention of Appendix 1 within the main document. Providing clear references to Policy SP1 and the AONB Management Plan within the main body of text (such as within paragraph 4.9) will highlight the relevant AONB policies.

• Wildernesse Estate
The Wildernesse Estate lies immediately to the west (outside) of the Kent Downs AONB. As the area is outside of the AONB, we do not have any comments on the VDS for this area.

• Westerham
The Westerham VDS covers a large area (the whole of Westerham Parish), the majority of which lies within the Kent Downs AONB.

As stated in the introduction to the document, a key aspect in the preparation of the statement is its compatibility with the statutory planning process. In this case we recommend that the VDS and design guidelines align with, and make clear reference to, the AONB Management Plan. We welcome the references to Policy SP1 of the Core Strategy, however there is no direct mention of the AONB Management Plan, which is important. Ideally, direct reference to the AONB management plan should be included within the main body of the VDS. A suggestion would be to include this within the Design Guidelines, which would help emphasise the importance of SP1 with respect to the AONB.

To further ensure clarity and alignment with the statutory planning process, we refer to the following sentences (p.35): Green Belt and AONB policies apply throughout the village to new development. Notwithstanding these policies this VDS identifies the important characteristics
and provides guidelines for new development. We would recommend removal of the second sentence, to avoid any contradictions between the VDS and overarching Local Plan documents. Design Guidelines within the VDS may complement and support existing policies (such as those within the AONB management plan) but should not be intended to replace existing (overarching) policies.

Kind regards,

Amy

Amy Kitching
Lead Adviser
Sustainable Development Team (Sussex and Kent)

Natural England
3rd Floor, Guildbourne House, Chatsworth Road, Worthing, West Sussex, BN11 1LD