
Wrotham Wrotham	562750 158678	12 July 2006	TM/06/02342/CR3
---------------------------	----------------------	---------------------	------------------------

Proposal:	Redevelopment to provide integrated highway depot comprising offices, garaging, salt barn and storage areas with associated car parking and landscaping
Location:	The Poplars London Road Wrotham Sevenoaks Kent TN15 7RR
Applicant:	Kent Highway Services

1. Description:

- 1.1 Members will recall that in September this year, a report and supplementary report (annexed) was considered regarding a Regulation 3 consultation on a County Council proposal, on behalf of the Kent Highway Services, to build a new highways depot to serve West Kent. That proposal was to be one of 3 “super depots” (also Ashford and Dover) covering Kent.
- 1.2 Members resolved to raise no objections but raised the following concerns and suggestions:
 - 1 It is considered that HGVs should not be permitted to make a right turn exit from the site in the interests of highway safety and the free flow of traffic.
 - 2 The County Council is asked to consider whether changes could be made to the design of the upper part of the south-west elevation of the office block, in the interests of privacy of neighbouring residential properties yet retaining an adequate internal environment to the office and to the salt barn’s height and design such that it be more traditional in appearance and therefore more in keeping with the locality.
 - 3 The County Council is asked to impose appropriately worded conditions to secure compliance with the Travel Plan and with noise, air quality and light pollution mitigation as detailed in the application’s supporting documents. The Travel Plan should be the subject of early consultation with TMBC and Wrotham Parish Council (WPC).
 - 4 All external materials should be subject of early consultation with TMBC and should be as subdued as possible to minimise visual prominence in longer distance views within the Area of Outstanding Natural Beauty.
 - 5 All possible steps should be taken to avoid the risk of contamination of local water courses by salt, road scalplings, surfacing and other materials – the County Council is asked to review this matter further with the EA.

- 6 The County Council is asked to engage in early discussion with WPC and local residents in order to investigate opportunities for mitigation of any detrimental impact of the development, as far as this proves possible.
- 1.3 Since that resolution was made, the County Council has reviewed the strategy for the provision of Highway Services including the number and location of the “super depots”. The outcome of this is the reduction of the number of such depots from three to two; one serving West Kent and the other East Kent. This decision has been referred back to the County Council’s Cabinet under scrutiny procedures and is due to be given further consideration on 4 December 2006. The results of this process will be included in a Supplementary Report.
- 1.4 The effect of the change in strategy is that the proposed depot at the Wrotham site will now serve 6 districts rather than 4 as previously (that is, it will also serve Maidstone and Tunbridge Wells districts).
- 1.5 The development is largely as described in the September report. The sizes of the office building, the salt barn and the parking area and number of spaces will be as previously submitted. Minor changes are proposed to the external storage areas.
- 1.6 The agents on behalf of the County Council submit that the site remains adequate in size because there will be enhanced use of new technology and more effective use of satellite locations or remote working. Whilst more staff will be attached to each of the “superdepots” (previously 159 staff, now 225), it is envisaged in the operational strategy that there will be no more staff on site than in the original proposals. The extra investment in technology is described as more home working; satellite depots having broadband connections; the headquarters of KHS and partner establishments being equipped in the same way; providing equipment that can be used on the road as well as in the office, video and telephone conference facilities and by providing internet facilities at home.
- 1.7 The agents also state that there will be no change to the number, frequency and duration of trips by gritters and other HGVs.
- 1.8 The application is accompanied by a revised Travel Plan and an addendum to the Transport Assessment which has taken on board TMBCs concern with the junction and now submits that all traffic exiting the site will make left turns only for safety and efficiency reasons.
- 1.9 It is submitted that the potential transport implications of the increase in staff numbers and the wider operational area is to be entirely accommodated by strengthened Travel Plan measures. The proposal is therefore predicted on the basis that there will be some change to bus use and bus measures but changes to highway impact will be very minor. To make the changed structure and the consequent increase in numbers of staff work in operational and sustainability terms, a radical new approach to working practice is to be introduced. Of the 225 total staff due to be based at Wrotham, it is envisaged that 16% will be primarily

home based, visiting the office only one day a week. A further 23% will be mostly home based, visiting the office only two days a week. On an average day, 28% of staff will be working from home. Of staff who need to be in the office and do not need their cars for work that day, it is intended that 23% will need to carshare and 14% to use public transport. It is assumed that none will walk or cycle, due to the location. Revised modal share targets have been included in the revised Travel Plan. A new analysis of the numbers of staff able to use public transport has been carried out to ensure that the percentage of 14% is realistic. Additional measures have been introduced to ensure modal share targets are achieved. These include

- increased management involvement and a full staff travel survey to confirm initiatives;
- detailed proposals for securing a public service or shuttle bus link, including a staff survey to determine likely patronage;
- extensive use of home working supported by substantial investment in IT and use of drop in centres where necessary;
- a vigorous parking management policy with monitoring to provide for a constant review of parking issues and immediate action to resolve any problems
- a full staff travel survey is to be carried out 6 months before occupation and an agreed parking management plan will be launched to staff 1 month before occupation with the assignment of parking permits and allocation of days for team meetings in place 1 month before occupation
- an improved bus or shuttle link to Borough Green Station will be in place by the time the site is occupied.

1.10 The change in strategy has also required a review of the site selection process because the enlargement in the geographical area means that Aylesford cannot now be discounted as too remotely located. However, the agents submit that the rapid response to severe weather is hampered at Aylesford due to local traffic conditions, traffic signals and speed limits to a much greater extent than at Wrotham.

1.11 The agent submits that the Wrotham site gives more scope for more rapid and immediate access to the strategic road network. It is also submitted that Aylesford is less well placed strategically when total travel distances to the principle conurbations in the West Kent area are calculated.

1.12 Aylesford is also said to be disadvantageous to develop in terms of its size and level changes compared to the Wrotham site.

2. The Site:

2.1 This is as previously described.

3. Planning History:

3.1 This is as previously described.

4. Consultees (additional comments to those previously reported):

By KCC.

4.1 Wrotham PC has submitted a comprehensive response to KCC following the consultation on the additional information. Many of the points made were summarised in the previous supplementary report. The full response is on file for Members to view but the new points raised can be summarised as follows:

- Surprise that the original information has been largely resubmitted following the previous representations of WPC without revision to the aspects which were shown to be a complete fabrication.
- TMBC has confirmed that there is a prima facie evidence of a breach of planning control involving the deposit of road scalping to extend the hard surface areas to the rear of the site
- The site has not been in continuous operation as a business park for 11 years (there has been no commercial activity since 2003 when impounded by Customs and Excise). When later sold at auction, no proven contention was made that it was a business park.
- The LDC application was withdrawn and the claims therein were unreliable
- The site was sold in 1994 as a dilapidated agricultural smallholding.
- As KCC is the applicant and the determining LPA, it is reprehensible that they have submitted false and discredited claims
- Application needs to be determined by an impartial planning inspector
- The over intensive nature of the proposed development that extends wholly across the site with very inadequate landscape mitigation is in contravention of the advice on Previously Developed Land in Annex C of PPG3
- Proposed hedgerow to the west is only 1m wide and there is virtually no landscaping of any significance on the eastern boundary. Neither comes anywhere near the standards required in Kent Design Guide there is one set of rules for commercial developments and a more lenient set for KCCs own application.

- Aylesford is dismissed as an alternative on one factor only due to a poorer road access
- WPC has driven around the Aylesford site and disputes the drive times figures given
- Aylesford already has offices and hence this cost saving has not been considered as a benefit.
- Aylesford scores much better in terms of sustainability and it is not in the MGB, AONB or SLA or so close to residential properties
- Aylesford site has room for expansion.
- Wrotham is too small for adequate car parking that a management team is needed to monitor and police its use
- PPS7 says this sort of development in the AONB must be in the national interest and only where there is a lack of alternative sites.
- Wrotham site has a poor accident record and unsuitable for pedestrian or cyclists and poorly served by public transport- there are inadequate parking spaces for visiting members of the public but the Travel plan advocates giving road safety lessons.

4.2 Platt PC: Object: A depot which is now expected to service 6 areas instead of the original 4 is bound to generate more trips. Transport Assessment Addendum says that a vehicle will enter or leave the new depot site every 20 seconds during peak hours and that without the Borough Green and Platt Bypass there would be a 9% increase in traffic on the approach to the site northbound from the M26. This would involve right turns into the site. There will be a material impact on the local highway network. We are confident that our view would be shared by anyone who has attempted, even now, to slip into the stream of traffic on the A20 along this stretch at busy times. Turning now to the likely effect on the A25 through Platt, the Transport Assessment does not address this directly. However, there is bound to be a significant increase in traffic along this substandard road which winds closely by houses and schools (yet is designated a Principal Route and Heavy Lorry Route). The depot should not be built until the overall traffic situation is improved by the provision of the long-awaited Borough Green and Platt Bypass and that the developer should be required to contribute to the cost of the bypass.

4.3 "Keep Boroughs Green": Object- This is a KCC scheme contrary to policy and needs a rigorous determination; massively overintensive in size and form and very ugly in a residential rural setting; salt barn is hideous and for all the wrong reasons will be a local landmark visible from the North Downs; frequent HGV traffic and gritters will cause dust, chemicals and noise; noise and light pollution through the night will make life hell for residents and the NHS care home; not clear why all

KCC Highway office staff have to be in a building adjacent to gritting lorries; gritting will normally take place when office staff have gone home to bed; KCC has purchased a site that is just capable of cramming in all their operations and now seek to justify this by an alleged efficiency in operations; bland statements of efficiency gains are completely inadequate and should be subject to independent analysis: the need to collate gritters and office staff should be examined closely because this reduces the number of available alternative sites; ES lacks information on biodiversity; archaeology; groundwater; soil contamination; need for salt tolerant plants; alternative site survey is flawed and designed to conclude the only site is the one in KCC ownership; possible planning violation to the rear in unauthorised hard standing.

- 4.4 BG-TAG: Object- the site will not need to cover the motorways and the A21 so why put it next to a motorway junction; should be in a more central location; makes more sense to have a plethora of small strategically situated depots that than respond quickly to local problems; 1000's of tonnes of salt will be stored close to Mid Kent Water Pumping Station and where there is a high water table – imminent ecological disaster from inevitable escapes of salt; unacceptable impact on residential properties, destruction of an actual portion of Green Belt and the loss of amenity value of view form the North Downs; huge amount of extra traffic on an area which suffers gridlock because of the absence of a By Pass; KCC planning needs to keep at arms length form KCC Highways and deliver an unbiased decision
- 4.5 I have no further consultations to report from internal consultees.

5. Determining Issues:

- 5.1 As detailed in the previous report, the proposed use, by virtue of the importance attached to the co-location of divisional offices with highway maintenance functions, would not suit most urban environments and the requirements are of a scale and nature that, together with the claimed locational needs, are not readily met in traditional industrial and business locations.
- 5.2 The effect of the County Council's operational decision to adopt a 2-depot strategy brings a potential choice between the Wrotham site and the existing depot at Aylesford. An assessment of the operational and strategic merits of the Aylesford site, has sought to demonstrate why it is not a practical alternative. Aylesford is, it is claimed, too small and less operationally suited in terms of rapid access and travel time to the strategic road network. WPC has questioned the travel times in the submitted information and there will clearly be variances that affect the performance of the site in this respect. Members will appreciate that at peak times how difficult it can be to access the strategic road network from that vicinity. Nevertheless, there is a balance to be struck between the operational disadvantages of Aylesford and the environmental planning issues raised at the Wrotham site. This is a matter of judgement bearing in mind that the majority of

the Wrotham site is allocated as a Major Development Site (MDS) in the green belt where there is an expectation that some development might take place. In this respect the site comprises a significant proportion of previously developed land, although as WPC point out, an element of hard standing does not have the benefit of planning permission. Notwithstanding the specific site characteristics there will be some impact on the wider rural area, for example the North Downs AONB, by virtue of the scale of development proposed.

- 5.3 The issue of the size of the site at Aylesford is clearly a key consideration if it is accepted that the need for the co-location of an office based and maintenance operation is critical. This is the view that has underpinned the County Council's approach to strategic highway service provision. If that is to be supported then the evidence is that the Aylesford site is impractical.
- 5.4 The Transport Assessment Addendum and Revised Travel Plan sets an ambitious challenge as the proposed measures in the Travel Plan now have much more emphasis on remote working, hot desking, home working, video/telephone conferencing. It is clear that the overall strategy to go to 2 depots will result in a different balance of investment in the overall service with enhanced information technology. I have no reason to conclude that the TA is incorrect in its assertion that the site specific transport implications of the change in strategy are neutral. However, it must be recognised that the operation of the site will require the very best practice in travel planning to be successful and meet the intended results of reducing transport impact and achieving a more sustainable development. In order to make this work it is essential that 'penalties' are built into the travel plan to enforce its implementation.
- 5.5 It is clear, from the consultation responses copied to this Council that there remains a great deal of local concern on a wide range of matters but most notably traffic generation. The matters raised in paragraphs 4.2 – 4.5 of this report must be addressed by the County Council when it reconsiders the application.

6. Conclusion and Recommendation:

- 6.1 This is an application that has raised strong objections from local communities that must be given careful consideration by the County Council notwithstanding the potential strategic merits of the project in the delivery of Highway Services. The issues to be balanced are the operational case for co-location and accessibility against the doubts raised on these matters and the weight of the environmental and traffic impacts that arise. On the latter the ability of the applicants to mitigate the impact is also an important factor.
- 6.2 In the circumstances it is **RECOMMENDED** that the following matters should be put to the County Council as part of their overall assessment of the case.
- The co-location and operational requirements of the proposed development of the site be renewed in the context of the revised strategy for the number of

‘super-depots’ in Kent and be considered carefully against the transport and environmental planning issues highlighted in this and previous reports and in the representations made on behalf of local communities.

- It is considered that HGVs should not be permitted to make a right turn exit from the site in the interests of highway safety and the free flow of traffic.
- The County Council is asked to consider whether changes could be made to the design of the upper part of the south-west elevation of the office block, in the interests of privacy of neighbouring residential properties yet retaining an adequate internal environment to the office and to the salt barn’s height and design such that it be more traditional in appearance and therefore more in keeping with the locality.
- The County Council is asked to impose appropriately worded conditions with targets and penalties to secure compliance with the Travel Plan and with noise, air quality and light pollution mitigation as detailed in the application’s supporting documents. The Travel Plan should be the subject of early consultation with TMBC and Wrotham Parish Council (WPC).
- All external materials should be subject of early consultation with TMBC and should be as subdued as possible to minimise visual prominence in longer distance views within the Area of Outstanding Natural Beauty.
- All possible steps should be taken to avoid the risk of contamination of local water courses by salt, road scalplings, surfacing and other materials – the County Council is asked to review this matter further with the EA.
- The County Council is asked to engage in early discussion with WPC and local residents in order to investigate opportunities for mitigation of any detrimental impact of the development, as far as this proves possible.

6.3 In addition the County Council **BE ENCOURAGED** to take full and detailed account of the all of the matters set out by consultees, during the life of the application, and in particular those recently received and reported in paragraphs 4.2 – 4.5 above.

Contact: Marion Geary