
Report of 13 September 2006

Wrotham	562750 158678	12.07.2006	TM/06/02342/CR3
Wrotham			
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 This is a Regulation 3 consultation from the County Planning Authority on Kent Highway Services' proposal to build a new highways depot to serve West Kent. This site is proposed to be one of 3 "super depots" (also Ashford and Dover) covering Kent. Haysden Depot in Tonbridge is intended to be a satellite depot for West Kent. This was the subject of a consultation under ref. TM/06/02349/CR3, no objections were raised by this Council.
- 1.2 All existing structures will be demolished.
- 1.3 The development will comprise a 2 storey office building of maximum ridge height of 9.4m with a footprint of 14m by 74m and an overall floor area in the order of 1554 sqm (16728 sq ft). It is shown to be sited along the south-eastern boundary, between 11m and 14m from neighbouring common boundaries. This block will have flint filled gabion walling and areas of cedar boarding to one side and glass curtain walling to the flank closest to neighbouring residential properties. The roof will be PVC coated aluminium in an elliptical shape with wind catchers at the ridge. It is to be mid grey in colour, as is the framing to the glazing etc.
- 1.4 A separate 2 storey contractor's office of 280 sqm (3014 sq ft) is also proposed in the central part of the site. This will be of similar materials to the office block but with a matt black roof. This will be attached to a covered garage 6.9m high of 1092 sqm (11754 sq ft). This is for the parking of 30 gritters and maintenance vehicles.
- 1.5 Also included is a 6.5m high covered storage building of 977 sqm (10517 sq ft) to be erected along the north-western boundary to the Oakdene transport café. This is to be shuttered concrete walls.
- 1.6 A domed salt barn of footprint 618 sqm (6652 sq ft) and 14m high (46 ft) is to be sited at the rear of the site. It is to be clad in asphalt shingle tiles. Adjacent will be a pond area.
- 1.7 There will be parking for 132 parking spaces and a bike rack for 15 cycles. Other facilities will include 612 sqm (6588 sq ft) of open storage and 175 sqm (1884 sq ft) of temporary storage and recycling and also a vehicle wash bay.

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- 1.8 The application is accompanied by a Transport Assessment which concludes the location is sustainable and that the road and proposed amended junction design (elongated inwards right turn lane by removal of splitter island and changed to lane widths) can cope with the predicted traffic flow and manoeuvres.
- 1.9 The Noise Assessment concludes that operational noise but not road noise will be a significant factor from a planning point of view. The design of the site with a brick wall to the north-west boundary and the office block to the south-east boundary means that residential properties are largely acoustically screened from most operational noise sources. It identifies the prospect of out-of-hours emergency vehicles, predominantly gritting lorries, adversely affecting the noise environment for Belleville which is close to the entrance/exit. The Noise Assessment states that the issue of noise from reversing alarms can be dealt with by alternative technologies and that the site is expressly designed to minimise the need for reversing manoeuvres by HGVs.
- 1.10 A submitted Air Quality Assessment concludes that at operational level, there will be no detrimental effect on the air quality at Belleville and Oakdene in terms of NO₂ and PM₁₀ from the development itself or associated traffic movements and that mitigation will be effective during construction phase.
- 1.11 A Design Statement has been submitted which states that the proposed buildings and structures have been sited within the MDS boundary as far as possible. They are said to have a siting and form to minimise environment impact; give a safe internal layout for vehicles and pedestrians; allow scope for maximum strategic landscaping; allow for mitigation of potential pollution problems. The extended eaves overhang to the glazed façade facing residential properties to the south-east is said to restrict potential overlooking from the mezzanine level. Uncontrolled external floodlighting will be avoided and shades will be fitted where appropriate.
- 1.12 A Landscape and Visual Assessment has been submitted. This states that the visual envelope of the site is restricted by the wooded North Downs escarpment, tree belts/woodland to the north, east and south; Junction 2A earthworks; rising ground at Park Farm and rising ground at Wrotham Heath and beyond. Where views do exist, it is suggested that these be read in the context of the existing ribbon development at the A20. It is claimed that any visual harm to the AONB and Green Belt is reduced by sensitive site layout, building design and choice of materials and landscape proposals.
- 1.13 The agents have submitted a supporting statement which makes the following points:
- *This is the best of 50 sites researched and available in West Kent taking into account accessibility; cost; planning constraints; availability; sustainability; services.*

- *Allows the co-location of operational and administrative services for commercial and transport services and their contractors for design, maintenance, emergency work, salting etc.*
- *The full range of uses intended to be co-located will contribute to significant benefits in responsiveness of the County's highway service providers and greater cost effectiveness to pursue and achieve best value.*
- *The site is the best to enable the effective maintenance of the highways network to be carried out year round and allows swift response during severe weather.*
- *The programme of co-location is in accordance with efficiency aims propounded in reports by Latham, Egan and Gershon.*

2. The Site:

- 2.1 The site area is 1.7 ha. The entire site is in the MGB and the AONB. Part of the site, some 0.837 ha (45%) lies within an area allocated as a Major Developed Site in the Green Belt, subject to Policy P6/18 of the TMBLP.
- 2.2 The site appears to have been last in mixed use for B1/B2/B8 and haulage uses with a dwelling at the site frontage. An area at the rear of the site is covered with hardstanding. This appears to have been installed in 2004 by a previous owner.
- 2.3 To south-east there are two dwellings; to the north is agricultural land; to west is the Oakdene Transport Café (which has planning permission for an associated residential dwelling).
- 2.4 The site is relatively narrow in width with a site frontage of 32m widening to 72m. The overall length is 280m. The land falls in level slightly from south-west to north-east.
- 2.5 Vehicular access to London Road currently allows informal right turns in and out although a splitter island restricts the length of the unofficial "refuge" lane and this part of the road is currently narrow in width.

3. Planning History:

- 3.1 TM/05/03515/CR3 Withdrawn 18.01.2006
Regulation 3 Outline Application for demolition of existing warehousing and storage areas on the site, and the erection of an office building, garaging, salt barn and storage areas, along with associated car parking and landscaping to form an integrated Road Services Depot for Kent County Council.
- 3.2 TM/05/00516/LDCE Withdrawn 26.04.2006
Lawful Development Certificate Existing: Mixed B1, B2 and B8 use with associated parking and outdoor storage.

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- 3.3 TM/98/00548/ORM Approved 06.05.1998
Minor amendment replacing hipped roof by gable end submitted pursuant to TM/97/1760FL: loft conversion to form bedroom and bathroom together with elevational alterations.
- 3.4 TM/97/01760/FL Approved 20.01.1998
Loft conversion to form bedroom and bathroom together with elevational alterations.
- 3.5 TM/96/01639/FL Approved 02.01.1997
Erection of extensions to the bungalow.
- 3.6 TM/96/01502/FL Approved 12.12.1996
Erection of detached garage.
- 3.7 MK/4/72/231 Refused 20.07.1972
Change of use of double garage to a farm shop.
- 3.8 MK/4/64/179 Approved 10.06.1964
The erection of a dwelling.
- 3.9 MK/4/55/592 Approved 24.11.1955
Fruit packing shed.
- 3.10 MK/4/55/533 Approved 28.10.1955
Addition of bedrooms, boxroom and office to 'The Poplars'.
- 3.11 MK/4/55/534 Approved 20.10.1955
Chicken/turkey pens.
- 3.12 MK/4/55/429 Approved 25.08.1955
Implement shed (extension of temporary period).
- 3.13 MK/4/49/171 Approved 23.06.1949
Fruit picking, storage building.
- 3.14 MK/4/49/153 Approved 19.05.1949
Proposed piggery.

4. Consultees:

By KCC:

- 4.1 EA: No objections subject to conditions on main sewer connection; pollution prevention and dealing with possible contamination.
- 4.2 PC: No response at the time of writing the report.

4.3 Private Reps:

- Tall office building and high salt barn will overwhelm the surrounding buildings.
- Development is 3 times the size of the existing.
- Risk of pollution to a stream which is culverted under the site.
- Salt may leach into the high water table.
- 24/7 full blown industrial yard will disturb local residents.
- Much greater volume of traffic than previously.
- TA does not mention traffic queues that build up outside the site entrance at morning and evening peaks.
- Concern at the size of the project, site is too small.
- Air pollution.
- Levels of traffic adding to congestion.
- Service road likely to be used as an overflow car park.
- Two dwellings will be sandwiched between an industrial development and the motorway.
- Previously demolished buildings were rebuilt to the side of the café.
- Applications to build bungalow in next door site refused.
- Would have greater impact on amenities.
- At night, this is not a noisy area.
- Will result in development along 95% of the boundary to a residential dwelling.
- Dispute developers definition of “openness”.
- Only part of the site is allocated for redevelopment.
- Inadequate information on sizes and heights of buildings etc to allow assessment of the impact on the openness.
- Landscaping will take years to become established and will not be effective during winter.

- This will be a metal and concrete jungle and no Green of the “Green Belt” will be left.
- Loss of privacy, light, openness and views.
- Salt corrosion to neighbouring property and greenery.
- What are the drainage proposals for the site.
- No mention of security and fencing.
- Will be flashing lights, noise and car doors slamming, especially during the evening.
- There is a better site opposite Invicta, away from residential properties.
- Not sustainable site - will increase car journey numbers and length.
- Contravenes AONB policy.
- Concern at impacts during construction.

By TMBC:

4.4 DHH: No objections subject to the implementation of the recommendations in the submitted JE Jacobs Reports "Air Quality Assessment" and "Noise Assessment" and subject to a condition requiring the prior approval of details of any external lighting of the site. Details to be submitted shall include a layout plan with beam orientation and a schedule of equipment in the design (luminaire type, mounting height, aiming angles and luminaire profiles). The lighting shall be installed, maintained and operated in accordance with the approved details.

5. Determining Issues:

5.1 Part of the site is allocated under the Major Developed Sites (MDS) Policy P6/18 of the TMBLP for environmentally beneficial redevelopment but the majority of the site is not and is in the MGB. The proposal is therefore, by definition, inappropriate development in the MGB and a departure from the Development Plan. If the scheme is to be approved, very special circumstances must be demonstrated. PPG2 (Green Belts) and Policies SS2 and SS8 of the KMSP and Policy P2/16 of the TMBLP apply. The judgement as to the assessment of very special circumstances falls to KCC as the determining authority.

5.2 Other issues to be considered will be visual impact on the landscape character of the AONB; effect on openness and amenities of the MGB; sustainability and highway safety and the free flow of traffic; noise, light and air pollution, and any other effects on residential amenities.

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- 5.3 The agent cites “very special circumstances” as the significant benefits in responsiveness of the County’s highway service providers and greater cost effectiveness to pursue and achieve best value. In this case the opportunity to co-locate the emergency functions including “gritting” teams for instance, programmed maintenance teams and the “strategic” functions that support and guide those operational functions is said to be a crucial benefit. In principle I agree with this assessment. From an extensive search for suitable sites in West Kent, the application site is said to be the best to facilitate the most effective functioning of a “super depot”.
- 5.4 The shortlist of alternative sites forms part of the application as a supporting document and the reasoning behind promoting this site is robust in my view. I accept that the proposed use, by virtue of the need to co-locate 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 locational needs, are not readily met in traditional industrial and business locations.
- 5.5 The proposed development in terms of new buildings is largely contained to the location of existing buildings and within the MDS allocation. However, even within that area, the buildings are generally taller than existing and cover a larger area of the site. Hence the development does not accord with Annex C4 of PPG2. The applicant has limited flexibility in this regard and I am of the view that the overall very special circumstances cited by the applicant are sufficient justification.
- 5.6 Most of the parking and the salt barn and some other buildings and structures within the overall development proposal will be located on land that may not legally be “Previously Developed Land” - the history of this part of the site is still under active investigation. However, there is not sufficient space to provide the salt barn or all the parking and therefore the application must be assessed as a whole what ever the history of the back part of the site. The need to cover the salt stockpile is for environmental reasons and the nature of the development proposed is such that it could not function without the salt barn or the car parking on this part of the site. Accordingly, I accept that the applicant has limited flexibility in this regard and I consider that very special circumstances are proven.
- 5.7 The site lies within the AONB and any substantial development as this requires justification. The strategic need in support of co-located Highway functions together with sensitive landscaping, siting, building form and materials is, in my view, in these circumstances such a justification. I would support the use of as darkly coloured roofing materials as possible as these tend to be less visually prominent in longer distance views.
- 5.8 Light impact in the AONB is an issue of relevance. In this case, the application site is a long established industrial/haulage use and there is no control over security lighting. In these circumstances, I would not object to a well designed scheme of

security or essential operational lighting that was appropriately sensitive to the location and of course neighbouring residential properties but in particular to limit “sky glow”.

5.9 In terms of sustainability matters it must be recognised there is a limited number of transport options and modes to access this site. However, it is the case that the unique mix of uses proposed for co-location will require a large site that is operationally practical in other respects.

5.10 The submitted Transport Assessment concludes the location to be capable of sustainable transport characteristics and that use of alternatives to the private car is viable and realistic although the submitted Planning Statement accepts the tension with PPS7 and PPG13 due to limitations in this respect. There is an acknowledgment in the submitted Travel Plan that the essential nature of a highways complex is the need for high level accessibility to the Highway network in the area, good levels of flexibility, unsocial hours of access for operatives having to attend the site, unplanned visits and inspections that can only depend on the use of private motor vehicles. This aspect combined with the location of the site, together with local topography and busy road interchanges mean that measures to encourage pedestrian, cyclist or public transport travel will be limited. However, this challenge is realistically met as far as practicable by the proposed measures in the Travel Plan which include:

- Display of bus and rail timetable information.
- Discounted monthly season tickets on Arriva buses.
- Interest free loans for rail season tickets.
- Encouragement of Kentcarshare project.
- Negotiation of flat rate taxi fares to and from the Station for visitors.
- Subject to the success of the above, consideration of a free or subsidized shuttle bus to Borough Green Station.
- Provision of secure cycle racks.
- Shower and locker facilities.
- Examination of shared cycle/footway path.
- Examination of measures to improve the safety for pedestrians and cyclists at Wrotham Heath roundabout.
- Catering on site.

- Possible pooled cycle and car.
- Remote and home working and video and telephone conferencing.

- 5.11 Policies TP12 and TP15 of the KMSP and Policy P7/17 of the TMBLP refer to HGV traffic and development onto the primary road network. In terms of trip movements I am satisfied that the traffic associated with the use can be accommodated in terms of number of trips added to the existing and predicted traffic flows. With one exception, I am happy that the road and proposed junction design (elongated right turn lane) can cope with the development's effects. Of some concern, however, is the prospect of a large number of slow moving vehicles, especially HGVs, that will exit the site by right turns onto an uphill stretch of road in proximity to a busy Transport Café exit. Notwithstanding the conclusion of the submitted Transport Assessment, in my view, all HGVs should be required to make left turns out only, using the Nepicar roundabout.
- 5.12 In terms of residential amenity, Policy QL1 of the KMSP and Policy P4/11 of the TMBLP apply. To the south-east of the application site are two dwellings (one owned by Invicta Community Care NHS Trust). To west is agricultural land, to north-west is Oakdene café (with planning permission for dwelling).
- 5.13 Noise and air quality impacts are said by the applicant to be acceptable and DHH endorses the recommendations of the relevant submitted expert reports.
- 5.14 In terms of noise, as detailed in PPG24 (Noise and Planning), there will be a particular character of the noise from these types of operations that may be harmful to amenities notwithstanding the predicted decibel levels. However, it must be borne in mind that the past uses on the site for industrial and haulage uses are unfettered in terms of hours and other conditions and this is a bench mark by which to assess the impact of the proposed use. The obvious need for 24 hour working during periods of severe weather is acknowledged. Due to the limited number of properties affected and the likelihood of such instances being relatively infrequent, I am satisfied that there are no noise grounds on which the principle of this type of development could be resisted.
- 5.15 In terms of neighbouring residential outlook, whilst some of the proposed buildings are tall, the office building (9.5m high) will be 40m from the dwelling at Belleville and 45m from the dwelling at Rosador. The salt barn, at 14m height will be 150m from each property. Therefore I do not concur with the residents' objection that they will suffer significant loss of light or outlook.
- 5.16 The design of the office building has large oversail of the eaves and the first floor mezzanine is set 5m in from the first floor windows on the south-east elevation which faces the rear part of the garden area of Rosador and parts of Belleville. I accept that the intervening distance (40m) is greater than would normally be

required under Kent Design standards. However, treatment of the upper part of the south-west elevation could possibly be revised to improve the situation further and the County Council should be invited to pursue this further.

5.17 I support the comments of the EA.

5.18 In conclusion, it is clear that this is a complex application that has elicited strong local objections. I have taken these all into consideration but on balance, I support this application in light of the significant strategic benefits of the co-location of Highway functions. Bearing in mind the site meets this identified strategic need with the consequent benefits that will bring to the Borough and West Kent as a whole, I consider that the site has been designed generally sensitively with regard to layout, building design and form and materials and with regard to the AONB and residential amenities.

5.19 However, I have some limited concerns as detailed above which I suggest need to be brought to the attention of the County Planning Authority.

6. Recommendation:

6.1 **No Objections Be Raised** subject to the following:

- 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.
- 3 The imposition of 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.
- 4 The roofing materials shall be as darkly coloured as possible as these tend to be less visually prominent in longer distance views within the Area of Outstanding Natural Beauty.

Contact: Marion Geary

SUPPLEMENTARY REPORTS

AREA 2 PLANNING COMMITTEE

DATED 13 September 2006

**Wrotham
Wrotham****TM/06/02342/CR3****Redevelopment to provide integrated highway depot comprising offices, garaging, salt barn and storage areas with associated car parking and landscaping at The Poplars London Road Wrotham Sevenoaks Kent TN15 7RR for Kent Highway Services**

Wrotham PC: The PC has sent its representations to the County Planning Authority and has copied in this Council. It includes a statutory declaration from the Chairman, Parish Councillor Harry Rayner. The full document is available on file for Members to view but its conclusions are summarised below:

- The proposal is inappropriate and there is no case for 'very special circumstances'.
- The alternative site survey was not conducted in a professional manner and it is not possible to determine if there are more appropriate locations.
- Consideration should be given to distributed sites linked by networked computer systems
- There should be a Scoping Report/ Environmental Statement.
- Concerns regarding contamination of ground water due to the network of streams and fresh water drains at this site and this should be weightily considered in an alternative site assessment. The applicant has specified salt tolerant plants for landscaping and this is a tacit admission that contamination is likely to occur.
- The site is not easily accessible by public transport and has specified extra parking because in reality staff will have no alternative than using their cars to travel to work.
- No canteen facilities and limited welfare area for depot staff will cause considerable further vehicle movements during the lunch period.
- A single depot servicing roads all across West Kent would hugely increase lorry travel compared to the present arrangements,
- It is not sensible to have the depot at the foot of Wrotham Hill which can get blocked so easily in snow conditions.

- The site entrance is constricted by an NHS care home. The 6.7 meter access must be capable of accommodating cyclists and potentially two HGVs all in opposing directions. This is particularly important given the high volume of use of the junction during the AM and PM peak with vehicles in and out every 20 seconds. This constitutes significant intensification of use of a non conforming access onto a primary distributor road.
- Soil contamination surveys need to be conducted across the site and an archaeological survey completed.
- Biodiversity investigations need to be completed particularly in regard to protected species which are a material consideration at the planning stage.
- The existing plans contain contradictions that need to be resolved.
- It is not agreed that “The whole application site is previously developed land”. It would clearly be a miscarriage of all planning regulation if a planning violation by a previous, but recent owner, was allowed to unduly influence a new planning application. (It is on this matter that the Chairman has issued a legal statement claiming that he saw tipping taking place on certain days that indicates that the works are unlawful.)
- This is an incompetent application that is only worthy of outright refusal. The significant omissions preclude KCC from further consideration.

DPT: The concerns raised by WPC are noted. With regard to the lawfulness or otherwise of the works cited in the Chairman of the Parish Council’s statement I should reiterate that this issue was not decisive in the thinking leading to my recommendation. The balance of all of the issues surrounding the matters raised by the PC is set out in my report. My assessment of the balance between the adverse factors and benefits remains as outlined in the main report and my recommendation.

RECOMMENDATION UNCHANGED
