

**Tonbridge**  
Medway

**30 November 2016**

**TM/16/03530/FL**

Proposal: New build Jaguar Land Rover showroom and aftersales facility. The application includes a new showroom, drive-in service lane, 20 bay workshop with MOT facility, external valet structure and associated external works

Location: Land North and South of Woodgate Way Tonbridge Kent

Applicant: Mr Stephen Pettyfer & Mr Harry Teacher

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## **1. Description:**

- 1.1 Detailed planning permission is sought for the development of a purpose built 'Jaguar' and 'Land Rover' car showroom and after sales facility. This includes car showroom space, a drive-in service lane, a 20 bay workshop with MOT facility, external valet facilities and other associated external works including new means of access from both Woodgate Way (A26) and Tudeley Lane, together with surface level and roof level parking for customers, staff and display vehicles.
- 1.2 The proposed development includes an 18 car showroom at ground floor with associated offices and handover bays divided between the two brands. To the rear of the showroom and on the first floor is office and amenity accommodation for staff, with a customer drive-in facility located to the rear of the showroom. The workshop provides separate bays for vehicles, an MOT bay and a speciality services and parts department. The roof of the building above the workshop would be utilised for additional car parking and is accessed via a ramp on the north elevation of the building.
- 1.3 New vehicle access points into the site are proposed from both Tudeley Lane to the north and Woodgate Way (A26) to the south.
- 1.4 By way of background, these proposals arise from a decision made by Jaguar and Land Rover to combine brands – something that is happening nationally and even globally – and following the applicant's (Jardine Motors Group) successful acquisition of the Tonbridge Land Rover business currently located at Vale Rise. It is understood that the applicant has undertaken an extensive site selection process covering the Sevenoaks, Tonbridge and Tunbridge Wells areas to identify a suitable and developable new dealership site for these combined brands. The application documents detail that both the current Jaguar (Sevenoaks) and Land Rover (Tonbridge) sites have proved to be congested and not able to fulfil customer expectations. The applicant has therefore chosen to locate a new site with a purpose built dealership facility combining both brands; a model that has been rolled out elsewhere.

1.5 The application documents detail that the current Land Rover (Tonbridge) premises would continue to trade as a luxury vehicle centre bringing premium brands to Tonbridge, and ensuring that existing employment at the site remains. In terms of the proposed dealership, it is outlined that the proposals would generate new employment opportunities for approximately 111 staff, including a mix of both full and part-time staff, employed by the proposed dealership. These include a mix of skilled personnel, together with apprenticeship training opportunities run by the applicant, Jardine Motors Group.

**2. Reason for reporting to Committee:**

2.1 Locally significant development and departure from policies contained within the Development Plan.

**3. The Site:**

3.1 The site comprises a parcel of land measuring approximately 1.29 hectares in size and is located on the south-eastern tip of Tonbridge, within the urban confines as defined by TMBCS Policy CP11. The land is currently in an open agricultural use and is surrounded by relatively mature vegetation (primarily trees and hedgerow) principally to the northern and southern boundaries.

3.2 The site is designated as safeguarded employment land by virtue of policies E1(k) and E3(m) of the DLA DPD.

3.3 The site lies within Flood Zones 2 and Zone 3a (in part), with the Somerhill Stream broadly defining the eastern boundary of the site. To the western boundary is the recently constructed 'Barnes Lodge' Care Home, to the north Tudeley Lane (a PROW and Bridleway) with the recently constructed Redrow Homes 'Somerhill Green' residential development beyond, and further to the east the office complex of 'Somerhill Business Park' and Porsche and Mini car dealerships. The A26 Woodgate Way lies immediately to the southern boundary of the site with Somerhill Park, a Grade II Listed Registered Historic Park and Garden beyond.

**4. Planning History (relevant):**

TM/95/50998/OA      Refuse      1 December 1995

Outline Application: Demolition existing buildings, erection retail store including bakery, coffee shop, crèche, pharmacy, petrol filling station, car wash, ancillary offices, storage, servicing and access

**5. Consultees:**

5.1 TWBC (neighbouring Authority): No response received.

- 5.2 KCC (H+T): Notes from the traffic data submitted and the estimates of traffic generation from TRICS comparisons that this proposal is expected to generate about 2 to 2.5% of traffic volumes on Woodgate Way. This level of additional movement is within daily traffic flow variations noted from the automatic count data and could not be asserted to constitute a severe impact.
- 5.2.1 The alignment of Woodgate Way is good offering good forward visibility. Visibility from the new access junction proposed similarly allows for appropriate splay lengths to be provided proportionate with observed through traffic speeds. The level of traffic activity to the site does not warrant the need for a right turning lane. Woodgate Way is 7.3m wide between the edge lines; the proposed access is on the northern side approx. 280m from the roundabout with Tudeley Lane. The car parking proposed is commensurate with adopted car parking standards, the operation of the proposals expected from the clients experience and accumulation profiles obtained from the TRICS analysis.
- 5.2.2 Notes that the tracking analysis provided for car transporter deliveries and use of the alternative egress onto Tudeley Lane. It is considered that use of this procedure for deliveries should be secured and maintained by condition to any planning approval so that any other possible but potentially undesirable manoeuvres are made contrary to any approval notice. Loading and unloading activities undertaken on Woodgate Way or Tudeley Lane should not be needed from this proposal and should therefore not be permitted.
- 5.2.3 The exit tracking analysis sweeps to the northern side of Tudeley Lane. It is further considered that should this application be approved, that as part of the necessary agreement with the Highway Authority for works to be undertaken in the highway, the applicant is required to implement parking restrictions on Tudeley Lane to enable manoeuvring to be undertaken satisfactorily and unhindered.
- 5.2.4 No objections to this application are raised, subject to the imposition of conditions.
- 5.3 Highways England: Is satisfied that on the basis of the information supplied, trips generated will be of a level and distribution that will not materially affect the safety, reliability and/or operation of the Strategic Road Network. Therefore, confirm that there are no objections to the proposal.
- 5.4 EA: Due to the vulnerabilities of the developments immediately downstream from the site, including the proposed [now permitted] school, it is essential that no works are undertaken that could increase the flood risk to this area.
- 5.4.1 Based on the modelling undertaken by the applicant, the proposed site is shown to only be at risk from flooding following extreme events greater than the 100yr return period, or in the event of culvert blockages. However, there is a degree of uncertainty in flow estimation for this watercourse and so minor increases in the design flow would indicate a greater flood risk.

5.4.2 The applicant has reiterated that site levels will be kept as existing. However drawing 3199-018A illustrates two cross sections across the site which indicate changes to site levels. These changes in ground level are not quantified but both cross sections indicate minor increases in ground level. Consequently, if flooding of the watercourse should occur, the proposed development would result in a small loss of flood storage if levels are to be raised as indicated on drawing 3199-018A. This would place the downstream school site and residential development at a slight increased risk of flooding.

5.4.3 If having undertaken the Sequential Test the local authority are minded to grant planning consent for this development, the area of the site at greatest flood risk is to be allocated for car parking and so represents a less vulnerable use as indicated by Table 2 of the Technical Guidance to the NPPF. On this basis there is no objection to the proposal subject to inclusion of the following condition.

- The development hereby permitted shall not be commenced until such time as a scheme to ensure a suitable flood compensation strategy will be implemented to offset raising of ground levels in the area shown to be within Flood Zone 3 of the Environment Agency Flood Map, has been submitted to, and approved in writing by the Local Planning Authority.

5.4.4 For information, the Somerhill Stream adjacent to the site is a designated 'main river' and under the jurisdiction of the EA for its land drainage functions. As of 6 April 2016, the Water Resources Act 1991 and associated land drainage byelaws have been amended and flood defence consents will now fall under the Environmental Permitting (England and Wales) Regulations 2010. Any activities in, over, under or within eight metres of the top of the bank may require a permit with some activities excluded or exempt. Further details and guidance are available on the GOV.UK website: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>.

5.5 KCC (LLFA): Confirms that provided the EA is satisfied with the further information submitted in relation to flood model extends and blockage scenario, and that the blockage scenario is accepted as "low" risk, we accept that the drainage measures as proposed provide appropriate attenuation of surface water generated within the site with an appropriate discharge rate.

5.6 Natural England: Comments in relation to this application are provided in the following sections:

5.6.1 *Statutory nature conservation sites – no objection.* Based upon the information provided, Natural England advises the Council that the proposal is unlikely to affect any statutorily protected sites.

5.6.2 *Protected landscapes.* The proposed development is for a site within or close to a nationally designated landscape namely High Weald AONB. Natural England advises that the planning authority uses national and local policies, together with

local landscape expertise and information to determine the proposal. The policy and statutory framework to guide your decision and the role of local advice are explained below.

- 5.6.3 In this respect a decision should be guided by paragraph 115 of the NPPF which gives the highest status of protection for the 'landscape and scenic beauty' of AONBs and National Parks. For major development proposals paragraph 116 sets out criteria to determine whether the development should exceptionally be permitted within the designated landscape.
- 5.6.4 Alongside national policy landscape policies set out in the development plan, or appropriate saved policies, should be applied. The statutory purpose of the AONB is to conserve and enhance the area's natural beauty. You should assess the application carefully as to whether the proposed development would have a significant impact on or harm that statutory purpose. Relevant to this is the duty on public bodies to 'have regard' for that statutory purpose in carrying out their functions (S85 of the Countryside and Rights of Way Act, 2000). The Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.
- 5.6.5 *Protected species.* Natural England has published Standing Advice on protected species which should be applied to this application as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.
- 5.6.6 *Local sites.* If the proposed site is on or adjacent to a local site, e.g. Local Wildlife Site, Regionally Important Geological/Geomorphological Site (RIGS) or Local Nature Reserve (LNR) the authority should ensure it has sufficient information to fully understand the impact of the proposal on the local site before it determines the application.
- 5.6.7 *Biodiversity enhancements.* The application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with paragraph 118 of the NPPF. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that '*every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity*'. Section 40(3) of the same Act also states that '*conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat*'.

- 5.6.8 *Site of Special Scientific Interest Impact Risk Zones*. The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires LPAs to consult Natural England on development in or likely to affect a SSSI.
- 5.6.9 Natural England has been re-consulted on further information (including a Landscape and Visual Impact Assessment report (LVIA)) and the above advice remains valid.
- 5.7 AONB Unit: The applicant's Planning Statement at 6.1.7, 6.1.30 and 6.1.31 says that the AONB boundary has not been 'updated' to take account of the employment allocation, the site does not functionally relate to the AONB and that the scope of the LVIA has been agreed by the AONB Unit. None of these statements are correct. The AONB boundary does not need to be updated, rather the allocation needs to be reviewed in the light of the designation since this AONB status appears to have been missed by error at the time of the employment allocation. Lastly the summary of relevant policies in the Planning Statement ignores the relevance of AONB policies, and in particular paragraphs 115 and 116 of the NPPF. The latter requires that planning permission will be refused for major development other than in exceptional circumstances. This test is not addressed at all in the Planning Statement.
- 5.7.1 Turning to the LVIA, the AONB Unit has no previous sight of the scope of this work and does not endorse it. As a nationally designated landscape the site should automatically be assessed as having high value, albeit that localised factors could in theory reduce its sensitivity. In paragraph 5.18 and the summary the site is described as not displaying any of the landscape characteristics of the AONB and not playing an intrinsic role in the AONB. This misses the point that the site was included in the AONB in 1983 because it was considered to meet the very high designation standard, and that any degradation since should be seen as an opportunity for enhancement not an excuse to develop.
- 5.7.2 Issue is also taken with the statement in 5.45 that "from a visual perspective, there are no opportunities for long ranging views of the site (and therefore development upon it) from the wider High Weald AONB". The site is an open green space which contributes positively to the setting of the A26, itself also within the AONB. The proposed development, with its open aspect to the A26, would have a significant visual impact on the AONB within and around the site which has not been taken into account at all by the LVIA.
- 5.7.3 In summary, the AONB unit feels that plans for this development do not appear to have been amended at all with respect to the impact on the AONB, and in particular the loss of vegetation along the A26 and its consequential increased visual impact on the AONB. I therefore continue to object to this proposal for the reasons set out in my letters of the 10<sup>th</sup> and 27<sup>th</sup> January 2017 – [those being] the proposed development would have a significantly damaging impact on the setting of the AONB by virtue of the visual prominence of the development from the

AONB boundary, the loss of the natural flood plain function and the detrimental impact on the habitat alongside the Somerhill Stream. This would be contrary to the objectives of the High Weald AONB Management Plan and paragraph 115 of the NPPF which requires that great weight be given to conserving and enhancing the AONB.

- 5.7.4 A further response from the High Weald AONB Unit has been received which notes the addition of 'new native hedgerow' along the boundary of the site with the A26. This addition is an improvement from the original drawings and will help to screen the open car parking provided it is well maintained and kept at a reasonable (2m) height. However, it is still proposed to remove the existing foliage on the highway boundary which will significantly open up views of this site, and of course instead of these views being of an open field as at present, they will be of car parking, hard-surfacing and buildings. This could not be said to either conserve or enhance the character of the AONB. I therefore continue to object to this proposal for the reasons set out in my earlier letters.
- 5.8 KWT: Notes that the revised plans now show the River Bank and its existing shrub vegetation will be retained within an additional 3m native vegetative buffer creating an 8.5m buffer between any hard-standing areas and the water's edge. These revisions are welcomed, albeit that this eastern boundary represents just a small percentage of the total length of the site boundary.
- 5.8.1 However, it is not accepted that the Planning Statement claim (para. 6.1.68) that 9 new trees to be planted (in extremely small planting beds) along the northern and southern boundaries will compensate for the loss of trees and the mature hedgerow along the Woodgate Way boundary. This structured 'edge' habitat contributes to an extensive network of corridors that connect South Tonbridge suburbs with the wider countryside. The eastern boundary trees, alongside the stream, connect to the Somerhill Park Local Wildlife Site to the south as well as countryside, a short distance away, to the north. Such attributes are likely to make these corridors important for many small mammals, including hedgehogs, and for foraging and commuting bats.
- 5.8.2 It is believed that the site is more valuable for wildlife than the protected species assessment suggests and that proposals to remove a large proportion of the boundary vegetation will weaken significantly the wildlife benefits of the wider network of vegetated corridors. The removal of all vegetation along the Woodgate Way boundary is particularly striking given the retention of edge habitat on recently developed sites immediately east and west of the application site.
- 5.8.3 The form and scale of the proposed development represents an over-development of the site. It will significantly detract from (if not sever completely) the site's role as an important element of a connected network of corridor habitats linking suburbs with the wider countryside. The development of the site for employment purposes and the retention of strong boundary habitat features are not mutually exclusive.

5.9 Southern Water: Should the LPA be minded to approve the application, recommend the imposition of a condition requiring details of foul and surface water sewerage disposal to be submitted to and approved by the LPA. It is also recommended that an informative is included stating the need for a formal application to Southern Water for connection to the public sewerage system.

5.10 Private Reps: 19 + site + press notice/0X/12R/0S. The representations received can be summarised as follows:

- Concerns with an increase in traffic on Tudeley Lane which is already a narrow road, serving the growing Somerhill Green development, the small Business Park, Mini/Porsche showrooms and new Primary School;
- Increased off-site car parking and the introduction of car transporters will only congest Tudeley Lane further. Notes that car transporters regularly park in the main road outside the existing Land Rover dealership at least once a week (sometimes more often) between 06:30 and 07:30 increasing the risk of accidents for road users;
- Consideration must be given to ensuring that car transporters be prevented from stopping on main A26 – particularly when the site is closed;
- Concerns with proposed new access onto A26 where traffic is moving at fast speeds;
- Cycling in the area is dangerous – there are no cycle paths nearby and a lot of fast moving traffic surrounds the area;
- Increase in noise from the proposed development (in terms of vehicle traffic and car servicing, repair and maintenance) which will have an effect on surrounding residents, including those in the new Abbeyfield Care Home (Barnes Lodge);
- Increased light pollution from intrusive site lighting;
- Surface water and flooding concerns from hard-surfacing an entirely greenfield site;
- Significant loss of natural habitats and wildlife through removal of trees and boundary vegetation;
- The development proposals are not sustainable – it does not contribute to the protection and enhancement of the natural environment and does not help (but actually diminishes) biodiversity and fails to adapt to climate change in a positive manner;



- The Government attached great importance to design and good design (in the NPPF) which is a key aspect of sustainable development – the proposed scheme fails in this respect and detracts from the locality by not protecting the character/appearance of the area, maintaining hedgerows and biodiversity;
- The submitted LVIA fails to take proper account of the locality, specifically in respect to the level of ‘tranquillity’ of the site. The document is selective and therefore incomplete; and
- Questions whether there will be any charging points for electric vehicles.

5.10.1 An objection has also been received from TCS based on the inappropriate use of the site which is not zoned for this purpose. It cites dangerous access onto Woodgate Way, generation of excessive traffic particularly in the context of the new Primary School (Bishop Chavasse), loss of trees and an adverse impact on a registered/listed Park and Garden and High Weald AONB. It considers that a more appropriate siting for the proposed development would be the former “Colas” site.

## **6. Determining Issues:**

6.1 This application seeks detailed planning permission for the development of a purpose built joint venture car dealership (serving both Jaguar and Land Rover brands) including showroom and after sales facility, service and MOT facilities, together with associated external works including new means of access, landscaping and parking. The main issues raised by the proposal are:

- Principle of development (including employment land allocation);
- Impact on the character of the area and the High Weald AONB;
- Impact on the setting of Somerhill Park;
- Highways and parking considerations;
- Flooding and drainage considerations;
- Design and amenity considerations;
- Ecology, trees and proposed site landscaping; and the
- Overall planning balance and conclusions.

### *Principle of development (including employment land allocation):*

6.2 The site is safeguarded for employment purposes by Policies E1(k) and E3(m) of the DLA DPD. These policies state that except where otherwise specified, proposals for non-employment uses, i.e. uses other than Business Use (B1), General Industrial Use (B2), or Storage and Distribution Uses (B8) will not be

permitted. The application proposes that the site will be used as a car dealership and servicing facility, a use which is considered to be Sui-Generis use under the Town and Country Planning (Use Classes) Order 1987 (as amended). On this basis, the proposals represent a Departure from the adopted Development Plan since the proposed use does not fall within the safeguarded B1, B2 or B8 land use allocation.

6.3 It is important to remember that the Council, in its role as Local Planning Authority, is required to determine planning applications in accordance with the Development Plan in force unless material considerations indicate otherwise.

6.4 Paragraph 22 of the NPPF, an important consideration in the determination of this application, advises that:

*“Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. [...] Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.”*

6.5 With this in mind, whilst the proposals do not relate to a typical traditional-sense employment “B” type land use, they do nonetheless offer a significant degree of employment potential. The application documents indicate that the proposals would generate in the region of 111 jobs with a mix of full and part time staff. The application details that the applicant, Jardine Motors Group, is one of the largest automotive retailers in the UK who are dedicated to delivering exceptional opportunities for employees – those covering a wide range of service sectors including sales, administration, management, finance, vehicle technicians, parts operatives, valet staff and drivers. A number of these roles require skilled workers with previous experience. However many do not and therefore the proposals represent a significant opportunity to secure a good range of jobs for the local labour market. It is understood that the applicant, through its Jardine Academy programme, is committed to apprenticeships including those training as vehicle technicians and all other areas of the business. In addition to the direct employment opportunities, the proposals also offer indirect employment through subcontracted roles such as site maintenance and cleaning.

6.6 Arguably, the proposals put forward for this site could offer a greater degree of employment opportunities – and including a greater spread of employment from skilled workers to apprenticeships – than could arise through a traditional “B” type employment land use such as storage or distribution warehouse, for example. I recognise the high level of employment offered by the proposed scheme and accordingly, afford this factor significant weight in my assessment of the prevailing development plan employment land allocation.

- 6.7 Moreover, I am mindful that whilst the application site has been allocated for similar employment-type land uses for the last 24 years (since 1993) within the Council's successive development plan documents, no firm employment prospects have been forthcoming. On the basis of these key market signals over that considerable period of time, I find that for the purposes of applying the guidance within paragraph 22 of the NPPF there is no reasonable prospect of the site being used for the allocated "B" type employment land use. It is therefore entirely reasonable, in my view, to consider a more flexible approach towards the development of this site, taking into account the broad objective of securing economic development and investment in the area and an ongoing supply of local jobs.
- 6.8 The application details that the applicant has undertaken an extensive site selection process covering the Sevenoaks, Tonbridge and Tunbridge Wells areas in order to identify a suitable and deliverable new dealership site for these combined brands. Existing Jaguar (Sevenoaks) and Land Rover (Tonbridge) sites have proved to be too small/congested and not able to fulfil customer demands from a modern dealership facility. Within Tonbridge, I am aware that there are very few sites which could reasonably be developed for such facility, with the only real contender being the former "Colas" site off Vale Road/Vale Rise (A26) and opposite the new Mercedes dealership. It is understood however that this site is not readily available for such development and therefore does not form a realistic alternative to the proposed site.
- 6.9 Whilst I accept that these proposals represent a technical departure from the adopted development plan in so far as the proposals do not relate to a "B" class land use, I have found that the proposals include a significant amount (and wide range) of employment opportunities. In light of this, the proposals do reflect the key spirit of the original employment land allocation so far as it relates to the creation of jobs that would contribute to the local economy, and in turn the wider economic and social objectives of sustainable development. I am satisfied on the evidence available that there are no realistic prospects of this site coming forward for a traditional "B" type employment land use and that these proposals could not be located on an alternative, or sequentially preferable, site within Tonbridge. Taking these factors into consideration, and having regard to the emphasis the NPPF places on not seeking to protect allocations in the long term, I do not consider there to be any justification to resist the principle of this proposal within the context of safeguarded employment land in this instance.

*Impact on the character of the area and the High Weald AONB:*

- 6.10 The application site comprises land which has most recently been used for agricultural purposes. It is free from any built structures and has not been the subject of previous built development despite it being safeguarded as employment land within the Council's development plan for circa 24 years. It contains boundary vegetation, comprising a mix of varying quality trees and hedgerows, those

principally forming its northern and southern boundaries with Tudeley Lane and Woodgate Way (A26) respectively.

- 6.11 The statutory duty to define the boundary of the High Weald AONB lies with Natural England, with the most recent statutory designation in this area being in 1983 by the then Countryside Commission (now Natural England). AONB boundaries were historically mapped at quite low resolution (for example an inch to the mile or 1:50,000) and therefore their definitive boundaries cannot be practically identified to closer tolerances. With that said, having reviewed the definitive map of the High Weald AONB (produced by the Countryside Commission in 1983), and having discussed the matter direct with NE, it now seems beyond reasonable doubt that the application site, together with surrounding land to the east (Somerhill Business Park – which falls within Tunbridge Wells Borough) and to the west (Barnes Lodge residential care home) falls within the designated High Weald AONB. This is explained in more detail below for the avoidance of any doubt:
- 6.12 In reviewing the Council's Development Plan Proposals Map, it has become clear that there has been a policy mapping inconsistency in so far as the land to the north of Woodgate Way – including the application site and the adjacent Barnes Lodge care home – have been shown outside of the AONB designation. In fact, upon further review it has been identified that the land has been shown outside the AONB for some 24 years within earlier adopted development plans. A similar policy mapping error is understood to have also occurred with the adjoining land to the east (Somerhill Business Park) which falls within Tunbridge Wells Borough (who we sought to notify of the issue once it was discovered). Although it cannot be ascertained why or how this has happened, several factors – including the construction of Woodgate Way in the late 1980's and the low resolution of the definitive 1983 map – are likely to have contributory factors.
- 6.13 Notwithstanding this now apparent long-standing position which has occurred in this part of South Tonbridge, it is important to note, as explained above, that the statutory duty to designate (and ultimately re-define) the boundary of an AONB lies with Natural England and not the Borough Council in its plan making function. With this in mind and upon identifying the error in question, immediate steps were taken to liaise with Natural England in order to establish the most appropriate way forward. Natural England advised that the current AONB boundary within this part of South Tonbridge is that shown on the definitive 1983 map produced by the then Countryside Commission and that the boundary of the High Weald AONB in this locality has not been reviewed or amended since. However, they also recognised that part of the AONB between its boundary and Woodgate Way has become affected by building development over time (post designation) to such a degree that the designation has become effectively meaningless within the developed area. This is not a common situation but similar examples do exist elsewhere. It could be argued that development control decisions in the past have not been taken having regard to the purpose of conserving and enhancing the natural

beauty of the AONB, but there is little to be gained from dwelling on the matter. Nevertheless, there is no doubt that the application site lies within the High Weald AONB, and ultimately these proposals must be considered as such, albeit recognising the actual context that has arisen adjacent to the site in recent decades.

6.14 First and foremost, Section 85 of the Countryside and Rights of Way Act 2000 places a duty on the Council (in this case in its role as Local Planning Authority) that in exercising or performing any of its functions in relation to, or so as to affect, land in an AONB, it shall have regard to the purpose of conserving and enhancing the natural beauty of the AONB.

6.15 The development plan, by virtue of TMBCS Policy CP7, requires that:

*“Development will not be proposed in the LDF, or otherwise permitted, which would be detrimental to the natural beauty and quiet enjoyment of the Areas of Outstanding Natural Beauty, including their landscape, wildlife and geological interest, other than in the exceptional circumstances of:*

*(a) major development that is demonstrably in the national interest and where there are no alternative sites available or the need cannot be met in any other way; and*

*(b) any other development that is essential to meet local social or economic needs.*

*Any such development must have regard to local distinctiveness and landscape character, and use sympathetic materials and appropriate design.”*

6.16 The NPPF, a material consideration in the determination of this application, recognises the importance of AONB's, stating at paragraph 115 that:

*“Great weight should be given to conserving landscape and scenic beauty in [...] Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.”*

6.17 The NPPF goes on to state at paragraph 116 that:

*“Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:*

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*

- *the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and*
- *any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”*

- 6.18 The application proposals relate to the development of a purpose built car dealership centre comprising the main showroom and servicing building, a car valet building, bin storage building, surrounding surface level car parking, landscaping and new vehicle entrances from Woodgate Way (A26) and Tudeley Lane. The proposed main dealership and service building would stand at approximately 8m tall (to the roof parapet level) and occupy a broadly central location within the site orientated with its front entrance façade facing south towards Woodgate Way. The remainder of the site would be occupied by a car park for use in connection with new and used car display vehicles, customer/visitor and staff parking. A second building, comprising car valet bays with an overall height of 4m would be situated on a north-south axis and be located close to the western site boundary with Barnes Lodge care home.
- 6.19 It is crucial to consider the prevailing site context, including surrounding land uses and associated built form, as part of the consideration of the proposals. In this locality, the character of the AONB is defined by its proximity to the urban edge of South Tonbridge. It is recognised that the tranquillity of parts of the AONB within the vicinity of the site, including the site itself, are affected by the edge of the established urban settlement and the presence of Woodgate Way (A26) which provides an important strategic road link around Tonbridge to the A21.
- 6.20 It is also important to note that the application site remains the last parcel of land within this southern belt of the Tonbridge urban confines, contained by Woodgate Way, that is undeveloped despite its longstanding employment allocation. Within recent years the surrounding area in the immediate vicinity of the application site has changed quite considerably owing to the presence of a number of key developments. Those include the construction of a large 3 storey care home building immediately west of the application site (which stands at circa 13m high), the former Priory Works industrial site being redeveloped for housing development including a mix of 2½ and 3½ storey buildings (with the higher buildings being located closest to the site entrance adjoining Tudeley Lane), the two storey office development of Somerhill Business Park just to the east of the site (situated within Tunbridge Wells Borough), and development at two car dealerships (Mini and Porsche) slightly further to the north-east of Tudeley Lane. Over a greater timescale, it must also be noted that the construction of the A26 Woodgate Way bypass in the 1980's considerably changed the character of the application site, including severing the AONB land to the north of the by-pass, including the application site, from the more open and tranquil landscape that is found to the south of the by-pass within Somerhill Park.

- 6.21 In order to assess the wider visual impact of this proposal upon the important landscape, the applicant has undertaken a Landscape and Visual Impact Assessment (LVIA). This provides evidence to support how the proposals are likely to sit within the wider AONB landscape as well as the more localised setting and surrounding built context the application site finds itself in today.
- 6.22 The landscape around Tonbridge is predominantly shaped by the River Medway with much of the town lying in the lower lying and broad Medway valley, with the southern part of the town occupying the gently rising land on the edge of the High Weald. The site itself is generally level (at around 30m AOD) and broadly follows a consistent level with immediately adjoining land, albeit the care home land to the west is on slightly elevated ground. To the north, the landform gently rises within the vicinity of the residential area of Lodge Oak Lane, whilst the topography rises more markedly at Somerhill Park (rising steeply from 35 to 80m AOD). The Park forms part of a localised ridge of higher land than Tonbridge, stretching to The Brakes (100m AOD) and Castle Hill (125m AOD) further south. This rising topography to the north and south, together with the existing tree cover and the built-up area of Tonbridge, effectively provide a significant degree of visual containment of the application site from the wider landscape.
- 6.23 The submitted LVIA includes an assessment of the key visual receptors from where views of the proposed development are likely to be obtained. These key visual receptors are then broken down into 3 categories: residential receptors (including residents within Somerhill Green, Barnes Lodge Care Home and the properties that back onto Tudeley Lane); rights of way users (including from Tudeley Lane bridleway and the Tunbridge Wells Circular Walk which runs directly through Somerhill Park); and highway users (including the A26 Woodgate Way, Tudeley Lane and the B2017 Tudeley Road). This is considered to be a robust assessment of key visual receptors where I would expect localised views of the site, and therefore the proposals, to be obtained. The applicant's work has similarly demonstrated that there are no opportunities for longer-ranging views of the site owing to the natural containment of the site by virtue of the surrounding site topography.
- 6.24 Dealing firstly with localised views upon nearby residential receptors, filtered views of the proposed development would be gained by residents within the frontage of Somerhill Green and those that back onto Tudeley Lane. These views would be filtered owing to the presence of strong intervening mature trees along Tudeley Lane (northern side) and those within the application site which flank this lane; a number of which would be retained as part of the proposals. The overall change for these residents would not be significant, in my view, owing to this intervening vegetation and importantly would not be substantially different from the general glimpse views of the new Barnes Lodge care home.
- 6.25 Owing to the proximity of the newly constructed Barnes Lodge care home to the application site, close range views of the development would be gained for those

residents who directly overlook the site. The proposed development would, therefore, represent a markedly different change for those residents. However I am mindful that with the development of the care home site, along with other nearby sites that I have mentioned above, the characteristics of the locality have changed significantly to become more of a part of the general urban area of this part of Tonbridge. Moreover, the application site itself has been long allocated for employment development. The eastern flank boundary of the care home site has now been planted (in accordance with the terms of its planning permission) and in time, this new planting, once fully established, should help to mitigate views between the care home and the application site. It is also important to note that the care home land is situated on slightly higher ground (circa +1m) and therefore the overall height and bulk of the proposed development is, to a slight extent, reduced owing to this level change.

- 6.26 In terms of Tudeley Lane public footpath users, this route falls within the urban area of Tonbridge and is largely flanked by built development further west and east beyond the application site boundary. There would, inevitably, be some full views of the proposed development as people pass the site alongside its northern boundary, although views would be to some extent filtered by existing trees shown to be retained as part of the proposals. Proposed new planting along the northern site boundary would clearly be beneficial in softening the visual impact of the proposals from this public footpath.
- 6.27 The Tunbridge Wells Circular Walk runs broadly centrally on an east-west axis through Somerhill Park. As noted earlier, Somerhill Park topography rises steeply from its northern boundary flanking the A26 to the south (with a level increase between 35 – 80m AOD). Somerhill Park contains many interspersed mature trees as well as planting flanking its northern boundary with the A26, all of which assist in the screening of the application site and also the urban edge of Tonbridge, from this historic park and garden. Whilst I acknowledge there would be some partial views of the proposal from this right of way, any such views would be seen within the wider backdrop of the built-up area of Tonbridge which forms an integral component of any view when looking north. The applicant's submitted photomontage view demonstrates that, in this context, glimpse views can be obtained of the Barnes Lodge care home building, the taller (Oast house) buildings in Somerhill Green and the slightly elevated residential area of Tonbridge beyond.
- 6.28 In terms of views from highway users, it is accepted that the proposals would inevitably result in a visual presence from the A26. These views would, however, be filtered by proposed new 'heavy standard' instant hedgerow planting and intermittent 'heavy standard' broadleaved trees. Once established, this would assist in filtering and 'softening' views of the proposed built form and would largely reflect the character and appearance of surrounding tree and hedgerow site boundaries which flank the A26. Similarly, views of the proposals from Tudeley Lane road users would be filtered by existing and proposed boundary vegetation and, ultimately, the proposals would not be seen as uncharacteristic in the context



of other built form which flanks the sides of Tudeley Lane i.e. Somerhill Green residential development, Somerhill Business Centre, Barnes Lodge Care Home and the existing Porsche and Mini dealerships.

- 6.29 The showroom building (which comprises the southernmost section of the overall built form) is to be clad in a combination of dark and light grey metal cladding panels, together with large areas of glazing. The workshop building and additional valet bay building (both located towards the north and west of the site) would be clad in a light grey metal trapezoidal cladding system. The proposed external cladding colours/materials are considered to represent an appropriate choice for the proposed building, and will ensure that the built form is not visually harmful to the surrounding character of the area and the wider landscape setting of the AONB.
- 6.30 The application is accompanied by a lighting plan for the site, including details of column mounted lights that would illuminate the site and car parking areas. This information demonstrates that the proposals would, by-and-large, result in the containment of light spill within the application site, with sections of between 1-5 lux falling slightly beyond the application site to all boundaries. Luminaires and columns will be strategically located to achieve the required lighting levels for safety and operation, but will be designed and located so as to minimise light spillage beyond the site. The proposed site lighting is considered to be appropriate for this location.
- 6.31 The LVIA has been subject to review by consultees and third parties, with views being received from Natural England and the High Weald AONB Unit. Importantly, Natural England has offered no objections to the proposals, noting that these proposals should be determined by applying national and local policies, together with local landscape expertise and by seeking advice from the AONB Unit. The AONB Unit has provided a number of responses on this application – based on changes to the scheme and the submission of a LVIA – but has maintained an overall position of objection to the scheme. The response is set out in paragraph 5.7 above, in which the unit states it remains concerned that the applicant's LVIA plays down the implications of the site's location within the High Weald AONB. More recently, and in light of amended proposals by the applicant for more mature (i.e. 'extra heavy' standard) hedgerow and tree planting along the southern site boundary, the Unit has recognised that this represents an overall improvement to the scheme which will help screen the open car park provided it is well maintained and kept at a reasonable height.
- 6.32 Whilst I acknowledge the comments provided by the AONB Unit, along with our statutory duty and the need to give great weight to conserving the landscape and scenic beauty of the AONB (as set out in paragraph 115 of the NPPF), I take the view that the prevailing site circumstances and that of the immediately adjoining built form provide an important context against which to determine this application. As discussed above, the site is physically defined by the A26 and surrounding built

form, all of which add to the overall urbanised characteristics of the locality. The site currently comprises an agricultural field which is, to a large degree, affected by the urban development of Tonbridge including the adjoining Barnes Lodge care home, Somerhill Green residential development and the Somerhill Business Centre (within Tunbridge Wells Borough). I have already concluded that from a wider visual perspective, opportunities for longer-ranging views of the site and the proposed development are limited owing to the surrounding site topography and intervening vegetation.

6.33 To conclude, based on the prevailing site circumstances and the character of surrounding developments which have come forward in recent years, and the particular characteristics of the proposed development including mitigation planting to the southern frontage, I am satisfied that these proposals can be absorbed within the landscape to a degree which would ensure the development would not be detrimental to the natural beauty and quiet enjoyment of the High Weald AONB. I therefore find that the proposed development is not contrary to the objectives of TMBCS Policy CP7 in relation to development within the AONB. Returning to the requirements of paragraph 116 of the NPPF, I consider there to be exceptional circumstances in the wider public interest that weigh in favour of the grant of planning permission. These are set out in detail in the preceding assessment but are centred on the broader economic benefits arising from the development taking place combined with the site specific context that has a crucial bearing on the landscape beauty of the AONB at this point. Although the physical presence of a building of this size and scale at this point within the landscape would have an impact on the landscape, this must be assessed within the wider context of the immediate surroundings and backdrop of nearby development. This is an important material consideration that has a direct bearing on the resultant impact of the development.

*Impact on the setting of Somerhill Park:*

6.34 Somerhill Park is a Grade II registered park and garden. The Park also contains a Grade I Listed Building (Somerhill) located to the south-east of the Park, and two Grade II Listed Buildings (Lake Cottage and Lake Bridge) located to the south side of the Park.

6.35 Section 66 of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 requires (inter alia) that an LPA shall have special regard to the desirability of preserving the setting of a listed building.

6.36 Registration of a park/garden is a material consideration in planning terms meaning that regard must be given as to whether the development would affect the park.

6.37 In these respects, paragraph 132 of the NPPF states that:

*“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of Grade II listed building, park or garden should be exceptional [...]”*

6.38 As required, the applicant has provided a heritage assessment for these proposals, assessing the proposed development in the context of the significance of the heritage assets affected. I have already provided commentary above covering the extent of the overall visual impact of the proposed development from within the Park. As noted, the land within Somerhill Park rises steeply to the south of the site, and views of the application site (and ultimately the proposed development) are limited owing to the filtering of views by virtue of the existing trees and landscaping within the park and along its northern boundary with the A26. Furthermore, any glimpse views of the proposals would be seen against the prevailing urban edge of southern Tonbridge, including the existing built form within Barnes Lodge care home, Somerhill Green residential development, Somerhill Business Park and the backdrop of two further Mini and Porsche car dealerships.

6.39 On the basis of the submitted information, and my assessment of the prevailing circumstances, I conclude that these proposals would not result in any discernible detrimental impacts on the significance of the heritage assets, including the Park and further afield listed buildings within it.

Highways and parking:

6.40 The application site is currently accessed via a simple maintenance-type access from Tudeley Lane, used predominately to maintain the land for agricultural purposes. The proposals seek to construct a new principal means of access from Woodgate Way (A26); a single carriageway road which is subject to a 60mph speed limit with street lighting. It is also proposed to construct a secondary means of access from the site on to Tudeley Lane; a single carriageway road which is subject to a 30mph speed limit with street lighting.

6.41 Tudeley Lane currently serves a number of developments including the Somerhill Business Centre, two car dealership garages (Mini and Porsche), the new Redrow Somerhill Green residential development and the recently permitted Bishop Chavasse Primary School. Tudeley Lane has been permanently stopped-up along much of the northern boundary of the application site between the entrance to the new Somerhill Green residential development at Barnes Lodge Care Home; this former highway now forms a bridleway and footpath.

6.42 The application includes a Transport Statement (TS) which models existing and proposed traffic flows on Tudeley Lane and Woodgate Way, taking into account a

2018 baseline that includes the consented Redrow housing development at Somerhill Green. The submitted TS includes sections covering personal injury traffic accident data, accessibility of the site (in terms of pedestrian, cycle and public transport modes) and proposed development site traffic generation including proposed traffic movements, parking and access arrangements for Woodgate Way and Tudeley Lane, a traffic impact assessment, stage 1 road safety audit and travel plan.

6.43 The submitted TS notes the following key information:

- The existing peak hour traffic on the A26 is 1,429 two-way vehicle movements (morning) and 1,657 two-way vehicle movements (afternoon) – this data being collected via an Automatic Traffic Count undertaken in September 2016;
- Personal injury accident records indicate no highway safety issues in the vicinity of the site;
- It is proposed to construct a new simple priority all movements' access on to the A26 and a secondary means of access from Tudeley Lane for service vehicles (such as car transporters). The Tudeley Lane access would be located in the same position as the existing maintenance access but it would be widened to accommodate car transporter vehicles;
- The site would have 119 parking spaces for staff and customers/visitors and 189 spaces for the storage of vehicles. The submitted documents indicate that the proposed maximum parking demands for the site would be 75 vehicles and therefore the proposed 119 spaces would accommodate the sites operational requirements and meet with adopted parking standards; and
- The proposed development would generate 41 two-way vehicle movements (morning) and 31 two-way vehicle movements (afternoon) on the A26;

6.44 The applicants TS has been reviewed by KCC (H+T), responsible for the surrounding Local Highway Network, and Highways England who are responsible for the strategic road network (i.e. the A21). KCC Highways consultee comments are set out in full at para. 5.2 above: however, to summarise it has not raised an objection to these proposals. It has noted that based on the estimated traffic generation from TRICS comparisons the proposal is expected to generate about 2 to 2.5% of traffic volumes on A26 Woodgate Way; this level of additional movement being within daily traffic flow variations noted from the applicant's automatic traffic count and would therefore not be asserted to constitute a severe impact.

6.45 It further notes that the alignment of Woodgate Way is good in offering good forward visibility. Visibility from the new access junction proposed similarly allows for appropriate splay lengths to be provided proportionate with observed through traffic speeds. Furthermore, it considers that the level of proposed traffic activity to

the site does not warrant the need for a dedicated right turning lane from Woodgate Way (A26) and that the proposed level of car parking is commensurate with adopted parking standards, in line with that expected from the applicants own experience of similar sites elsewhere and accumulation profiles obtained from the TRICS analysis.

- 6.46 In terms of the proposed secondary means of access onto Tudeley Lane, KCC (H+T) notes the submitted tracking analysis provided for car transporter vehicles. It has suggested that the use of the exact procedure for deliveries (by car transporter) be secured and maintained by condition of any planning permission. Whilst technical tracking details do show that car transporter vehicles can egress the site onto Tudeley Lane, and therefore such movements are capable of working in principle, the request from the Highway Authority for securing detailed arrangements for site deliveries by car transporters is a reasonable and proportionate approach in this instance; something that is possible to secure via planning condition. Moreover, I consider that these delivery arrangements are necessary in light of the proximity of the proposed secondary means of access onto Tudeley Lane to the recently permitted Bishop Chavasse Primary School and the under-construction homes at Somerhill Green. Such a scheme will also need to include arrangements for out-of-hours delivery arrangements to the site, such that car transporter vehicles do not park on the surrounding roads of Tudeley Lane or Woodgate Way (A26) during early hours before the site opens.
- 6.47 KCC (H+T) has noted that should the application be approved, it will be necessary for the applicant to enter into a S278 Agreement with the Highway Authority. At this stage I understand that such an agreement would need to cover junction works to be undertaken in the highway, parking restrictions on Tudeley Lane (to ensure car transporter vehicle tracking can be achieved at all times), and a review of boundary treatment, street lighting and crash barriers along the site frontage and highway verge with Woodgate Way (A26).
- 6.48 Highways England has confirmed that, on the basis of the information supplied, trips generated will be of a level and distribution that will not materially affect the safety, reliability and/or operation of the strategic road network. Therefore, it has not raised any objections or requested any requirements to the proposals.
- 6.49 I am mindful that the NPPF makes it very clear (at paragraph 32) that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. Whilst I appreciate that this site does not benefit from any extant planning permission – it is quite simply an undeveloped site – in light of the consultee views of both KCC Highways and Highways England, I have no grounds to conclude that the development would result in a severe residual cumulative transport impact such that a refusal of planning permission on this basis could be justified.

- 6.50 As outlined above, the proposals do include a significant degree of employment; up to 111 jobs, of which the applicants estimate that around 69 staff could be on the site at any one time. Whilst the site is some distance from the main town centre, there are nonetheless footpaths running along the side of the A26 and Tudeley Lane meaning that the site is accessible by foot from the surrounding residential areas to the north, also linking into public transport bus services from Lodge Oak Lane. It is also proposed to provide 10 cycle parking spaces within the site and the application includes a travel plan setting out the applicant's intentions for reducing dependence on staff car journeys. These proposed measures will assist in integrating the proposed dealership into the locality, including the potential for reducing the dependence on private staff car journeys.
- 6.51 I am satisfied that the proposed level of on-site customer and staff parking is acceptable, a position that has been accepted by the Highway Authority in its consultee response. The level of parking has been dictated through an assessment of adopted parking standards, together with the experience of the applicant found at similar joint-dealership sites around the country. In the latter respect, the applicant quite rightly notes that there is a degree of flexibility in terms of customer parking in so far as some customers will be arriving by courtesy vehicle (which would have their own dedicated parking areas) or, once dropped over in the hand over bays, customer vehicles would be moved to the service/workshop/valet areas (where there would again be dedicated spaces for these functions).
- 6.52 In conclusion, I have no objections to these proposals based on highway and parking matters subject to the imposition of conditions covering the provision of the agreed number of vehicle and cycle parking spaces within the site, together with a condition requiring delivery arrangements for car transporter vehicles covering both proposed movements in and out of the site and the arrangements for out-of-hours deliveries.

*Flooding and drainage:*

- 6.53 The application site lies within Flood Zones 2 and in part Zone 3a, with the Somerhill Stream broadly defining its eastern boundary. The site is currently an undeveloped/greenfield site, currently used for agricultural purposes.
- 6.54 The aim of national flood risk policy, as set out in the NPPF and the accompanying Technical Guidance, seeks to avoid inappropriate development in areas at risk of flooding by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. The overall aim is to steer new development to Flood Zone 1. Where there are no reasonably available sites in Flood Zone 1, LPAs determining planning applications for development at any particular location should take into account the flood risk vulnerability of the proposed land use and consider reasonably available sites in Flood Zone 2. Only where there are no reasonably available sites in Flood

Zones 1 or 2 should the suitability of sites in Flood Zone 3 be considered, taking into account the flood risk vulnerability of land uses.

6.55 In this instance, I have already outlined elsewhere in the report that there are a lack of suitable and deliverable sites for such facility within the urban confines of Tonbridge, with low flood risk areas. The only site which could be considered suitable is the former “Colas” site on the junction of Vale Rise/Vale Road, however it is understood that this is not available at this point in time for this development. Quite simply, it is accepted that there are no alternative sites within the locality that could be suitable for the proposed car dealership. On this basis, I must conclude that there are no reasonably available sequentially preferable sites for the proposed development within Flood Zone 1. Moreover, it must also be remembered that this site is allocated within the Development Plan for employment purposes under DLA DPD Policies E1(k) and E3(m) – a key material consideration in so far as it has already established the sequential preference of this site being developed for employment land use purposes.

6.56 The proposed development of the car dealership falls into the “less vulnerable” flood risk classification (as set out in the national Technical Guidance) where development in Flood Zones 2 and 3a is acceptable. NPPF paragraph 103 states that:

*“When determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where, informed by a site-specific flood risk assessment flooding the Sequential Test [...], it can be demonstrated that:*

- within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and*
- development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and gives priority to the use of sustainable drainage systems.”*

6.57 The application has prepared a site specific flood risk assessment which has been reviewed by the EA. Following discussions between the applicant and the EA, and on the basis of further flood modelling work, the EA has confirmed it is prepared to remove its earlier objection to the proposal subject to the inclusion of the following condition with any permission:

*“The development hereby permitted shall not be commenced until such time as a scheme to ensure suitable flood compensation strategy will be implemented to offset raising of ground levels in the area shown to be within Flood Zone 3 of the Environment Agency Flood Map, has been submitted to, and approved in writing by the Local Planning Authority.*

*Reason: To prevent an increased risk of flooding elsewhere.”*

- 6.58 The imposition of this condition as requested by the EA is considered to be crucial in ensuring that flood risk beyond the site, most notably the Somerhill Green residential development and the recently permitted Primary School, are not placed at an increased risk of flooding, something that NPPF advice clearly seeks to prevent. Whilst the applicant has maintained that proposed site levels will be kept as existing, the EA has noted that there are some minor changes of levels shown within the submitted cross-section drawings. Consequently, if levels were to be increased within the application site by a minor degree, and flooding of the watercourse should occur, the proposed development is likely to result in a small loss of flood storage space and therefore could place development downstream at a slight increased flood risk.
- 6.59 The proposed condition therefore ensures that final consideration of proposed site levels, and as necessary suitable on-site compensation storage, is reserved for further consideration by both the EA and Planning Authority. In light of the advice from the EA I am confident that a technical solution can be found to ensure that the proposed development does not give rise to increased flood risk elsewhere, including the nearby residential and Primary School developments.
- 6.60 In accordance with the requirements of the NPPF, it will be necessary to secure the submission of a flood evacuation plan by condition. This can be appropriately conditioned as a technical detail which can be submitted to and approved before first occupation of the dealership, and thereafter maintained as approved for the life of the development.
- 6.61 Consultations have been carried out with KCC Flood and Water Management Team (as the Lead Local Flood Authority) who have confirmed that provided the EA is satisfied with the flood model extents and blockage data [which they are], it accepts that the drainage measures proposed in Appendix J and K of the submitted FRA prepared by WSP (November 2016) provide appropriate attenuation of surface water generated within the site with an appropriate distance rate. On this basis, no further conditions are required in respect with surface water drainage matters.
- 6.62 In conclusion, I am satisfied that the proposals are acceptable in the context of flooding and drainage matters, subject to the imposition of the condition covering site levels and on-site compensation storage space, as requested by the EA.

*Design and amenity:*

- 6.63 A core principle contained within the NPPF centres on the need to always seek high quality design and a good standard of amenity for all existing and future occupants of land. Chapter 7 of the NPPF broadly requires that planning decisions should aim to ensure that developments respond to local character and history and reflect the identity of local surroundings and materials, whilst not preventing or



discouraging appropriate innovation. Similarly, TMBCS Policy CP24 sets out the general criteria for all new development including a provision that development must respect the site and its surrounding and that it will not be permitted where it would be detrimental to the built environment and amenity of a locality. This is supported by MDE DPD Policy SQ1 which states that all new development proposals should protect, conserve and where possible enhance:

- the character and local distinctiveness of the area including any historical and architectural interest and the prevailing level of tranquillity; and
- the distinctive setting of and relationship between, the pattern of settlement, roads and the landscape, urban form and important views.

6.64 The proposals represent a functional building, based upon a joint venture proposal to deliver two premium brand car dealerships to Tonbridge. It is, of course, important to remember that the site is allocated for employment purposes and therefore could, in theory, be developed for general warehousing (or other employment-type uses) in accordance with that policy which would result in the site being occupied by most likely a series of industrial units.

6.65 The proposed built form would sit comfortably within the site and, although the main building is quite large (with an overall height of 8m to roof parapet), it would not appear incongruous when considered against the larger 3 storey (circa. 13m high) care home development to the west. The location of the main building within the central part of the site seeks to ensure a suitable relationship with the care home (a distance of at least 22m for the closest part of the main building) and indeed the residential dwellings situated within the newly constructed Somerhill Green residential estate (a distance of at least 35m for the closest part of the main building). Long cross-sections have been provided demonstrating that the proposed building will sit below the ridge height of the adjacent care home building by some 6m owing to the slightly elevated land levels (+1m) within the care home site.

6.66 The proposed development also involves the provision of a smaller, car valet building to be situated near to the western site boundary. This building has an overall ridge height of 4m and an overall length of 35m. Owing to the change in land levels between the application site and care home on higher ground (circa +1m) sectional drawings indicate that the proposed car valet building would appear as a typical 1 storey building (at around 3m in height) from the adjoining care home. Whilst the proximity of the valet building to the care home would be relatively close (circa 8m) owing to the valet buildings typical 1 storey height and that this part of the care home comprises by-and-large the ground floor commercial kitchen area and the external bin storage area, I find this relationship to be acceptable.

6.67 The main showroom and workshop building are to be clad in a combination of dark and light grey metal cladding panels, together with large sections of open glazing (for the car showroom area). The valet building and also the bin storage building would be similarly be clad in light grey metal cladding panels. The proposed external cladding colours/materials are considered to represent an appropriate choice for the proposed building, and will ensure that the built form is not visually harmful to the surrounding character of the area.

6.68 In conclusion, I consider that these proposals represent an appropriate, albeit functional, form of development for this particular site. In my view the proposed development represents a better form of development than could otherwise be secured through the site's employment land allocation, for example in connection with a storage/distribution building. I have also found that the proposed built form does not result in an unacceptable amenity impact for surrounding residential receptors, including those of Barnes Lodge care home, Somerhill Green or those properties slightly further afield which back onto Tudeley Lane.

Ecology, trees and proposed landscaping:

6.69 The application is accompanied by an Ecological Appraisal. This makes various recommendations including: that on the basis of proposed tree removal, clearance works should be undertaken outside of the bird breeding season (March-August inclusive); the retention of Somerhill Stream buffer landscaping (as requested by the EA); and that ecological enhancement measures such as bat boxes and native tree and hedgerow planting be incorporated as part of the development. These measures can be appropriately secured via planning condition.

6.70 The application is also accompanied by an Arboricultural report which identifies proposed tree removal as part of the development, trees which can be retained and pruned, and also tree protection measures to be employed during construction works to safeguard those trees within the site which are to be retained.

6.71 Overall, the report identifies that there are 21 trees within the site; this includes a mix of Oak, Beech, Ash, Horse Chestnut and Cherry trees. Of these, it is proposed to remove a number of which are immediately under the development footprint or very close to it such that they could not be retained. The table below indicates the trees which are proposed to be removed and their British Standard Classification:

	<b>British Standard Category</b>			
	<b>A (High quality)</b>	<b>B (Average quality)</b>	<b>C (Low quality)</b>	<b>U (Lowest quality)</b>
<b>Trees to be removed as part of proposed</b>		Tree 3 (Oak) Tree 6 (Beech)	Tree 1 (Beech) Tree 2 (Ash) Tree 8 (Ash) Tree 9 (Ash) Tree 10 (Horse Chestnut) Tree 12 (Ash) Tree 16 (Ash)	Tree 19 (Ash)

development		Total 2 x B Category tree	Tree 18 (Ash) Tree 20 (Cherry) Tree 21 (Oak)  Total 10 x C Category trees	
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- 6.72 The trees to be removed are predominately situated along the northern site boundary with Tudeley Lane (8 in total), with a further 2 trees located on the eastern boundary with the Somerhill Stream and a further 2 trees on the southern site boundary with A26 Woodgate Way.
- 6.73 Whilst tree loss within the site is unfortunate, this must be balanced against the wider benefits identified arising from the development taking place, as set out earlier within this report. Additionally, it should be acknowledged that the application does include retention of 9 trees within the site which include a mix of Oak, Ash and Beech. Several of these trees would be pruned back, and all are shown to be afforded appropriate protection during construction activities.
- 6.74 Detailed planting plans have been provided for the entire site, including the proposed strengthening of site boundaries to the north, east and south. Generally, the northern site boundary is shown to be strengthened with a mix of extra heavy standard (minimum 450cm high) common oak (*quercus robur*) and field maple (*acer campestre*) trees, together with new native hedgerow planting. Under existing trees which are shown for retention there would be new under storey planting with shade tolerant ground cover plants. Existing vegetation alongside the eastern site boundary adjoining the Somerhill Stream is shown to be retained, and strengthened with extra heavy standard (minimum 450cm high) common alder (*alnus glutinosa*) trees.
- 6.75 The proposals include the removal of the front boundary hedgerow alongside the A26 Woodgate Way and its replacement with a new native hedgerow planted with extra heavy standard 'instant' hedging plants (with minimum heights of 1m). The proposed native hedgerow is shown to be interspersed with a mix of extra heavy standard (minimum 450cm height) common oak and field maple trees. On the roadside of the proposed new hedge, the highway verge is shown to be turfed.
- 6.76 The remainder of the site would be planted with a range of landscape planting between parking bays and the proposed buildings. This includes a mix of common box (*buxus sempervirens*) hedgerows, shrub and herbaceous planting, and ornamental tree planting.
- 6.77 The proposed site planting is considered to be entirely appropriate and assist in the filtering of views of the development in the short, medium and longer-term. In respect of the removal of existing hedgerow along the southern site boundary (with the A26), whilst it is unfortunate to see existing vegetation removed, I am satisfied that the proposed replacement planting would secure a high-quality and

appropriate replacement which would assist in screening the development from more open land to the south.

Overall planning balance and conclusions:

- 6.78 It is well established that the weight to be afforded to relevant material planning considerations in the determination of an application is one for the decision maker and, as such, it will inevitably require the exercising of planning judgement. In coming to a view on these proposals I am mindful that there are, quite clearly, a number of significant planning issues at play and it is therefore necessary to balance these factors accordingly as part of the final recommendation before Members.
- 6.79 In this instance and notwithstanding the sites designation as AONB – which dates back to and has remained unaltered since 1983 – I am mindful that the fundamental character of the surrounding area has markedly changed in recent years. The application site, whilst being an undeveloped parcel of land, very much has the sense of being within an urban area as a result of its visual containment on three sides by built development and being flanked along its southern boundary by the main Tonbridge by-pass (A26), a key strategic link route around Tonbridge Town Centre to the A21. In my view the site no longer possesses a sense of tranquillity and natural beauty that it once did before the development of the by-pass and the other surrounding developments; this is quite clearly in stark contrast to the prevailing landscape character of the more open land which rises steeply to the south of the application site within Somerhill Park.
- 6.80 I am mindful that the site has a long-standing employment land use allocation, dating back some 23 years within successive development plan documents. It has to be recognised, therefore, that there is a realistic expectation that some form of urbanising development could be expected on this site as a result of that land use allocation. Whilst I accept that the proposals do not represent a typical “B” type employment land use, and therefore depart from the development plan allocation, for those reasons identified above, I consider the proposals provide a realistic opportunity to secure high-quality development which will lead to the creation of a significant number of jobs; those being a mix of full and part-time working, skilled jobs and apprenticeships.
- 6.81 As I have recognised earlier within this report, this opportunity actually represents a higher and indeed broader range of employment opportunities than could otherwise be realised from the development of this site in connection with a storage/distribution (B8) land use, which would be entirely permissible within the context of the land use allocation. I therefore afford the proposed level of employment generation significant weight in my assessment of this application. Supporting economic development and job creation is, quite rightly, one of the key thrusts of current Government policy as contained within the NPPF.

- 6.82 Whilst the proposals do inevitably result in the development of substantial built form, and there will be key visual presence from the A26, these factors can to some degree be mitigated by securing an appropriate landscaping scheme along the site frontages with the A26 and Tudeley Lane. Negotiations have taken place with the applicant to secure an appropriate planting scheme along the southern site frontage and I am confident that these measures will secure an acceptable replacement frontage to the site.
- 6.83 The proposals have been assessed in relation to highways and parking impacts, in connection with flood risk, ecology and trees and in respect of surrounding amenity, and for those reasons identified earlier in my report, I find the proposals to be acceptable in these respects subject to, as appropriate, the imposition of suitable planning conditions. Accordingly, there are no grounds in these circumstances to weigh heavily against the grant of planning permission.
- 6.84 In conclusion, I consider that the overall benefits of these proposals and other material considerations in terms of the context of the site outweigh the degree of harm which would be caused to the AONB and the setting of Somerhill Park such that my judgement falls in favour of a recommendation to grant planning permission, subject to those conditions listed below.

## **7. Recommendation:**

### **7.1 Grant Planning Permission** in accordance with the following submitted details:

Technical Specification dated 07.02.2017, Other APPENDIX 1 dated 30.11.2016, Planting Plan 16-61-PL-201-D dated 04.04.2017, Planting Plan 16-61-PL-202-D dated 04.04.2017, Site Plan 3199-010 Existing Site Plan dated 30.11.2016, Existing Elevations 3199-015 Existing Site Sections dated 30.11.2016, Sections 3199-019 Proposed Building Section dated 30.11.2016, Proposed Elevations 3199-020 Proposed Valet \_ Bin Store Elevations dated 30.11.2016, Proposed Plans and Elevations 3199-021 Bin Store dated 30.11.2016, Proposed Floor Plans 3199-040-H Proposed Ground Floor dated 30.11.2016, Proposed Floor Plans 3199-041-H Proposed First Floor dated 30.11.2016, Proposed Roof Plan 3199-042-E Proposed Roof Plan dated 30.11.2016, Proposed Floor Plans 3199-045-C Floor Plan Areas dated 30.11.2016, Proposed Elevations 3199-061-D Proposed South and East dated 30.11.2016, Proposed Elevations 3199-062-D Proposed North and West dated 30.11.2016, Topographical Survey CM/16639 dated 30.11.2016, Location Plan 3199-001 dated 30.11.2016, Letter STAGE 1 ROAD SAFETY AUDIT LETTER dated 01.12.2016, Acoustic Assessment BS4142 ASSESSMENT REPORT dated 30.11.2016, Report STAGE 1 ROAD SAFETY AUDIT V1 dated 01.12.2016, Flood Risk Assessment NOVEMBER 2016 dated 30.11.2016, Transport Statement ADL/CC/3329/04A April 2017 dated 04.04.2017, Travel Plan ADL/CC/3329/04A April 2017 dated 04.04.2017, Tree Report TCL-K2-TL/AIA dated 06.04.2017, Ecological Assessment EXTENDED PHASE 1 Final Report V5 31.3.17 dated

06.04.2017, Other LANDSCAPE AND VISUAL IMPACT April 2017 dated 10.04.2017, Archaeological Assessment REPORT NO 17/14 dated 10.04.2017, Planning Statement 12479 dated 10.04.2017, Design and Access Statement APRIL 2017 dated 10.04.2017, Lighting 50707-E01 T3 dated 07.04.2017, Lighting 50707-E02 T3 dated 07.04.2017, Proposed Elevations 3199-016 B Context South \_ East Elevations dated 10.04.2017, Sections 3199-018 B Proposed Site Sections dated 10.04.2017, Parking Layout 3199-030 M Proposed Site Plan dated 10.04.2017, subject to:

**Conditions:**

General Controls

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: In pursuance of Section 91 of the Town and Country Planning Act 1990.

2. The development shall be carried out in accordance with the following approved plans and documents:

Technical Specification dated 07.02.2017, Other APPENDIX 1 dated 30.11.2016, Planting Plan 16-61-PL-201-D dated 04.04.2017, Planting Plan 16-61-PL-202-D dated 04.04.2017, Site Plan 3199-010 Existing Site Plan dated 30.11.2016, Existing Elevations 3199-015 Existing Site Sections dated 30.11.2016, Sections 3199-019 Proposed Building Section dated 30.11.2016, Proposed Elevations 3199-020 Proposed Valet \_ Bin Store Elevations dated 30.11.2016, Proposed Plans and Elevations 3199-021 Bin Store dated 30.11.2016, Proposed Floor Plans 3199-040-H Proposed Ground Floor dated 30.11.2016, Proposed Floor Plans 3199-041-H Proposed First Floor dated 30.11.2016, Proposed Roof Plan 3199-042-E Proposed Roof Plan dated 30.11.2016, Proposed Floor Plans 3199-045-C Floor Plan Areas dated 30.11.2016, Proposed Elevations 3199-061-D Proposed South and East dated 30.11.2016, Proposed Elevations 3199-062-D Proposed North and West dated 30.11.2016, Topographical Survey CM/16639 dated 30.11.2016, Location Plan 3199-001 dated 30.11.2016, Letter STAGE 1 ROAD SAFETY AUDIT LETTER dated 01.12.2016, Acoustic Assessment BS4142 ASSESSMENT REPORT dated 30.11.2016, Report STAGE 1 ROAD SAFETY AUDIT V1 dated 01.12.2016, Flood Risk Assessment NOVEMBER 2016 dated 30.11.2016, Transport Statement ADL/CC/3329/04A April 2017 dated 04.04.2017, Travel Plan ADL/CC/3329/04A April 2017 dated 04.04.2017, Tree Report TCL-K2-TL/AIA dated 06.04.2017, Ecological Assessment EXTENDED PHASE 1 Final Report V5 31.3.17 dated 06.04.2017, Other LANDSCAPE AND VISUAL IMPACT April 2017 dated 10.04.2017, Archaeological Assessment REPORT NO 17/14 dated 10.04.2017, Planning Statement 12479 dated 10.04.2017, Design and Access Statement APRIL 2017 dated 10.04.2017, Lighting 50707-E01 T3 dated 07.04.2017, Lighting 50707-E02 T3 dated 07.04.2017, Proposed Elevations 3199-016 B Context South \_ East Elevations dated 10.04.2017, Sections 3199-018 B Proposed Site Sections dated 10.04.2017, Parking Layout 3199-030 M Proposed Site Plan dated 10.04.2017.

Reason: To ensure that the development is carried out in accordance with the plans and documents hereby approved.

3. All materials used externally shall accord with the approved plans, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that the development does not harm the character and appearance of the existing building or visual amenity of the locality including the High Weald Area of Outstanding Natural Beauty.

4. The development shall be undertaken in strict accordance with the Recommendations (Chapter 8) as set out in the Extended Phase 1 Ecological Habitat Survey Report prepared by Hone Ecology, dated 31 March 2017.

Reason: In accordance with the requirements of the National Planning Policy Framework 2012 and the Managing Development and the Environment DPD 2010.

5. The existing trees and shrubs shown in the Arboricultural Assessment (prepared by Tree Craft Ltd, reference TCL-K2-TL/AIA, dated 4 April 2017), other than any specifically shown to be removed, shall not be lopped, topped, felled, uprooted or wilfully destroyed without the prior written consent of the Local Planning Authority, and any planting removed with or within such consent shall be replaced within 12 months with suitable stock, adequately staked and tied and shall thereafter be maintained for a period of 10 years.

Reason: Pursuant to Section 197 of the Town and Country Planning Act 1990.

6. The development hereby permitted shall be carried out in accordance with the tree protection measures set out in the Arboricultural Assessment (prepared by Tree Craft Ltd, reference TCL-K2-TL/AIA, dated 4 April 2017) so as to avoid damage to the existing trees, including their root systems as part of the landscaping scheme.

Reason: Pursuant to Section 197 of the Town and Country Planning Act 1990.

7. The scheme of landscape planting detailed on 'Landscape Planting Plan 1 of 2' (drawing 16-61-PL-201 Revision E) and 'Landscape Planting Plan 2 of 2' (drawing 16-61-PL-202 Revision E) shall be carried out in the first planting season following occupation of the building or the completion of the development, whichever is the earlier. Any trees or plants which within 10 years of planting are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species, unless the Local Planning Authority gives written consent to any variation.

Reason: Pursuant to Section 197 of the Town and Country Planning Act 1990 and to protect and enhance the appearance and character of the site and locality.

8. The development hereby permitted shall be carried out in strict accordance with the details contained in the Flood Risk Assessment (prepared by WSP dated November 2016) and the Technical Note (prepared by WSP dated 1 February 2017) and as

subsequently approved by the Local Planning Authority pursuant to the requirements of condition (9) in respect of on-site flood compensation strategy.

Reason: To prevent an increased risk of flooding elsewhere beyond the application site, in accordance with the guidance contained in the National Planning Policy Framework (paragraph 103).

Pre-Commencement

9. The development hereby permitted shall not be commenced until such time as a scheme to ensure suitable flood compensation strategy will be implemented to offset raising of ground levels in the area shown to be within Flood Zone 3 of the Environment Agency Flood Map, has been submitted to, and approved in writing by the Local Planning Authority.

Reason: To prevent an increased risk of flooding elsewhere beyond the application site, in accordance with the guidance contained in the National Planning Policy Framework (paragraph 103).

Before First Occupation

10. The development hereby permitted shall not be first brought into use until details of the arrangements for deliveries to the site by car transporter vehicles has been submitted to and approved in writing by the Local Planning Authority. The submitted details shall include movement of such vehicles entering and exiting the site, together with management measures in the event of out-of-hours deliveries to prevent parking on the adjoining highway. Thereafter, deliveries by car transporter vehicles shall only take place in accordance with the approved details.

Reason: In the interests of highway safety and to ensure a successful integration of the development within the surrounding highway network including adjacent Primary School and Somerhill Green residential development.

11. The development hereby permitted shall not be first brought into use until the vehicular accesses and routes within the site and any associated engineering operations have been constructed in accordance with the approved drawings.

Reason: In the interests of highway safety.

12. The development hereby permitted shall not be first brought into use until the area shown on 'Proposed Site Plan' drawing 3199-030-M as staff, visitor and customer parking and turning areas have been provided, surfaced and drained. Thereafter it shall be kept available for such use and no permanent development, whether or not permitted by the Town and Country Planning (General Permitted Development) Order 2015 (or any Order amending, revoking and re-enacting that Order), shall be carried out on the land so shown or in such a position as to preclude vehicular access to this reserved parking and turning area.

Reason: In the interests of highway safety.



13. The development hereby permitted shall not be first brought into use until 10 cycle parking spaces for staff and visitors as detailed in paragraph 3.3.6 of the Transport Statement Revision A (prepared by ADL Traffic Engineering, reference ADL/CC/3329/04A, dated April 2017) and as shown on 'Proposed Site Plan' (drawing 3199-030-M) has been provided on site. Thereafter, the installed cycle parking facilities shall be retained at all times for the life of the development hereby permitted.

Reason: In order to encourage more sustainable modes of transport to/from the site by staff and visitors.

14. The development hereby permitted shall not be first occupied or first brought into use until details of a Flood Evacuation Plan including means of safe access and egress to/from the site shall be submitted to and approved by the Local Planning Authority. Thereafter, the approved Flood Evacuation Plan shall be implemented as approved at all times for the life of the development hereby permitted.

Reason: To reduce the risk and impact of flooding on the proposed development, in accordance with Tonbridge and Malling Borough Core Strategy 2007 Policy CP10 and paragraphs 100-104 of the National Planning Policy Framework 2012.

15. Before the installation of any fencing or gates surrounding the perimeter of the site details shall first be submitted to and approved in writing by the Local Planning Authority. Thereafter, perimeter fencing and gates shall only be erected in accordance with the approved details, unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of visual amenity and in order to protect the character of the High Weald Area of Outstanding Natural Beauty.

16. The development hereby permitted shall not be first brought into use until details relating to when the external lighting will be in use has been submitted to and approved in writing by the Local Planning Authority. Thereafter the external lighting shall only be operated in accordance with the approved details.

Reason: In the interests of visual amenity and in order to protect surrounding residential amenity and the character of the High Weald Area of Outstanding Natural Beauty.

**Informatives:**

1. With regard to the construction phase of the development, the applicant is asked to take all reasonable steps to mitigate any impact upon surrounding residents. With this in mind, they are strongly encouraged to apply for a Section 61 Control of Pollution Act 1974 'prior consent' notice to regulate working hours/methods. It is recommended that you contact the Environmental Protection Team on [pollution.control@tmbc.gov.uk](mailto:pollution.control@tmbc.gov.uk) in advance of the commencement of works to discuss this further. The applicant is also advised not to undertake construction works outside the hours of 08:00 - 18:00 Monday to Friday, 08:00 - 13:00 on Saturdays

and to not undertake works on Sundays, Bank or Public Holidays. Furthermore, arrangements for the management of demolition and construction traffic to and from the site should be carefully considered in the interests of residential amenities and highway safety.

2. The applicant/developer should enter into a formal agreement with Southern Water to provide the necessary sewerage infrastructure required to service this development. The applicant/developer should contact Southern Water, Sparrowgrove House, Sparrowgrove, Otterbourne, Hampshire, SO21 2SW (Tel: 0330 303 0119) or [www.southernwater.co.uk](http://www.southernwater.co.uk) in order to progress the required infrastructure.
3. The proposed development is within a road which has a formal street numbering scheme and it will be necessary for the Council to allocate postal address(es) to the new property/ies. To discuss the arrangements, you are invited to write to Street Naming & Numbering, Tonbridge and Malling Borough Council, Gibson Building, Gibson Drive, Kings Hill, West Malling, Kent, ME19 4LZ or to e-mail to [addresses@tmbc.gov.uk](mailto:addresses@tmbc.gov.uk). To avoid difficulties for first occupiers, you are advised to do this as soon as possible and, in any event, not less than one month before the new properties are ready for occupation.

Contact: Julian Moat