

Appendix 1 to Item D5

Application for an integrated highways depot, London Road, Wrotham – TM/06/2342

A report by Head of Planning Applications Group to Planning Applications Committee on 10 October 2006

Application by Kent Highway Services for redevelopment to provide integrated highways depot comprising offices, garaging, salt barn and storage areas with associated car parking and landscaping, The Poplars Business Park, London Road, Wrotham – TM/06/2342

Recommendation: Subject to any further views received by the Committee Meeting and satisfactory resolution of outstanding issues, recommend that the application be referred to the Secretary of State, and that subject to her decision, planning permission be granted subject to conditions.

Local Member: Mrs V Dagger

Classification: Unrestricted

Members' Site Visit

1. A group of Planning Application Committee Members visited the application site on the 17 January 2006 to acquaint themselves with proposals for a highway depot and the issues arising, in considering an earlier (outline) planning application that was subsequently withdrawn with a view to submitting this current (detailed) application. They were accompanied by the local County Member, representatives of the applicants, a Member and officer of Tonbridge & Malling Borough Council, Members of the Parish Council, officers of the Highway Authority, Planning Applications Group and the Council Secretariat. The Committee Secretary's notes of the meeting are attached as an Appendix.

Site

2. The application site is located on the north eastern side of the A20 London Road, Wrotham about 100 metres north of junction 2A of the M26. The site is approximately 1.7 hectares in area and comprises of vacant residential property fronting the A20 and adjoining the access road to the main part of the site, areas of hard standing and a number of disused industrial and commercial buildings. The Oakdene Transport Cafe adjoins the north western boundary of the site, residential properties adjoin the south western, western and south eastern boundaries and farmland adjoins to the north east and east. The adopted Tonbridge and Malling Borough Local Plan shows the site to be within the Metropolitan Green Belt but about half of the site at the south western end is identified as part of a larger site within the Green Belt suitable for redevelopment. The site is also within the Kent Downs Area of Outstanding Natural Beauty and North Downs Special Landscape Area. *A site location plan and a plan of the planning designations are attached.*
3. The applicant has provided details of the planning history as far as is known and indicates that although currently disused the site has hosted a range of industrial and commercial uses since the late 1940's, of a varying intensity of activity. It is also stated that for at least the previous 11 years the site had been in continuous operation as a Business Park. In that respect it was subject of an application for a Certificate of Lawful Development in order to regularise B1, B2 and B8 uses on the site, although this was subsequently withdrawn. It is apparent that one of the buildings on the site was constructed without the benefit of planning permission and similarly the area at the

Appendix 1 to Item D5

**Application for an integrated highways depot, London Road,
Wrotham – TM/06/2342**

Appendix 1 to Item D5

**Application for an integrated highways depot, London Road,
Wrotham – TM/06/2342**

Appendix 1 to Item D5

Application for an integrated highways depot, London Road, Wrotham – TM/06/2342

north eastern end of the site, previously a grassed area, has in recent years been surfaced with scalplings. The applicant considers that the entire site constitutes previously developed land in terms of the definition in Annex C of PPG3 since all of the land within the curtilage of a site, attached to a building, is included.

Background and Proposal

4. The application seeks planning permission for demolition of existing warehousing and storage areas, and the erection of a 2 storey office building, garaging for lorries with a contractor's office, salt barn and storage areas, along with associated car parking and landscaping to form an integrated Road Services Depot for Kent Highway Services. Permission is also sought for the adaptation of the existing access to the A20. *Reduced copies of the drawings showing the illustrative site layout, floor plans and site elevations and sections are attached.*

The application is also accompanied by a Planning Supporting Statement, Design Statement, Access Statement, Transport Assessment, Travel Plan, a Landscape and Visual Assessment, Air Quality Assessment and Noise Assessment

5. The depot would be one of three principal depots in West, Mid, and East Kent, each serving four districts, in West and Mid Kent to be supported by a satellite depot. The application site would be the principal depot in West Kent, supported by a satellite site the subject of redevelopment of the existing Haysden Depot at Tonbridge, serving between them Dartford, Gravesham, Sevenoaks and Tonbridge and Malling districts.
6. The proposal for this and the other highway depots follows a decision taken by Cabinet in September 2004 to reshape the Kent Highways Service including among other things the County Council taking back the functions previously delegated to the twelve District Councils under an agency agreement. The purpose of the proposed development is to enable the County Council to discharge its functions as Highway Authority more efficiently and effectively, involving the co-location of maintenance, design and administrative functions. More specifically the purpose is:
 - To enable the effective maintenance of the highways network to be carried out all year round
 - In winter, and at other times of the year as necessary, to respond swiftly to the arrival of severe weather, to keep roads open to facilitate safe and convenient travel for all road users
 - To take full advantage of the organisational benefits to be derived from the location on a single site of a range of professional and administrative staff along with manual workers
7. The proposed 2 storey office building would be located parallel to the south eastern boundary of the site, between 11m and 14m from neighbouring common boundaries. It would have a footprint of approximately 74 metres by 14 metres and a ridge height of 9.175 metres above finished floor level. It would provide accommodation for 115 staff, mostly in open plan but with separate offices for senior staff, meeting rooms, space for archiving and filing, kitchens, print room, first aid room and shower room. The first floor is a mezzanine floor occupying just over half of the space, and on the north west side of the building. The north west elevation would be constructed from a flint faced gabion wall up to a height of 3m from floor level. Above this level panels of cedar boarding are proposed. The south east elevation, would be constructed of a grey coated curtain walling system, with green tinted glass panels, and fronted by a slatted timber brises soleil at the mid point. The north east elevation, would have full height

Appendix 1 to Item D5

**Application for an integrated highways depot, London Road,
Wrotham – TM/06/2342**

Appendix 1 to Item D5

**Application for an integrated highways depot, London Road,
Wrotham – TM/06/2342**

Appendix 1 to Item D5

**Application for an integrated highways depot, London Road,
Wrotham – TM/06/2342**

Appendix 1 to Item D5

**Application for an integrated highways depot, London Road,
Wrotham – TM/06/2342**

Appendix 1 to Item D5

**Application for an integrated highways depot, London Road,
Wrotham – TM/06/2342**

Appendix 1 to Item D5

**Application for an integrated highways depot, London Road,
Wrotham – TM/06/2342**

Appendix 1 to Item D5

Application for an integrated highways depot, London Road, Wrotham – TM/06/2342

glazing to the lobby, whilst the staircase is enveloped in gabion walling and cedar panelling with grey coloured aluminium louvres above. The south west elevation, enclosing a subsidiary escape stair is expressed with cedar panelling above a glazed lower level and full height glazing returning from the south east elevation. The pitched roof is curved at the central ridge and proposed to be clad in mid grey PVF coated standing seam aluminium. On the north west side there would be a series of roof lights and sun pipes, and on the south east side a continuous dormer with solar heating panels at either end of it. A row of grey glass reinforced plastic finials/windcatchers for natural ventilation is proposed at 7metre spacing along the ridge.

8. The garage building would be located in the centre of the site, parallel to the office building, with parking for 28 vehicles (gritters, maintenance vehicles and 2 disabled spaces), along with the contractor's offices at the western end on two floors. The building would be semi-circular at each end with a footprint of approximately 91 metres by 15 metres and have a ridge height of 7 metres. The offices would be clad in cedar boarding to tie in with the main office building but the building would otherwise be open sided and have a curved roof clad with a dark grey/matt black coated standing seam metal roofing.
9. The salt barn would be located towards the north western end of the site, in line with garage building, and adjacent to a new pond area. It would have an elliptical footprint of about 618 square metres with a diameter of about 31 metres one way and 25 the other way. It would have concrete masonry painted walls to a height of about 3.5 metres with a tall dome-like roof clad in asphalt shingle tiles giving an overall height of about 14 metres. It would have a capacity of 4000 tonnes.
10. A covered storage area with a mono-pitched curved roof would be located along the north western boundary parallel to the garage building, about 75 metres long by 13 metres in depth and a height of 6.5 metres. This would have shuttered reinforced concrete walls to a height of 3 metres to provide open fronted bays. In addition some 612 square metres of open storage will be provided, and 175 square metres for temporary storage and recycling. These facilities would also be located adjacent to the north western boundary of the site. 3m high reinforced concrete walls would be constructed for the open storage bays. Those that face the A20 would be externally faced with brickwork.
11. Other structures, plant, equipment and facilities, as shown on the site layout would include:
 - 2 no 12 tonne hot boxes [each of footprint size 3.5 metres wide x 3.4 metres deep] for the closed storage of bitumen coated product.
 - A propane storage tank.
 - Adjoining the salt barn a storage building of reinforced concrete construction with a plan area of 50 square metres and 4.5 metres high for the separate storage of brine salt. The roof would be pre-formed glass reinforced plastic clad panel construction, lead grey coloured.
 - A silo mixer for mixing of brine solution is located adjacent to the salt store with a 16 square metre in footprint area and 2.5 m high. An associated tank for brine storage with a diameter of 3 metres and a height of 4.5 metres.
 - Skips and bins for the recycling area.
 - A vehicle wash bay adjacent to the garage building with drainage discharged via interceptor tanks and filters.
 - A weighbridge.

Appendix 1 to Item D5

Application for an integrated highways depot, London Road, Wrotham – TM/06/2342

- A 12,500 litre self-bunded tank for fuel storage with a height of 3.27metres and a plan area 3.2metres x 2.5metres.
12. The site layout drawing shows a total of 125 car parking spaces. Of these, 106 spaces would serve the depot and office, 7 would be disabled spaces, and 12 would be for visitors. Five spaces would be provided for motorcycles, and a secure rack for 15 cycles. These facilities are located mainly in the north eastern part of the site but 10 car parking spaces are located at the front on the south western side of the access road. There is also a lay by/holding area on the south western side of the access road and a footway to the offices adjoining the boundary of Bellaville. In the main car parking area it is proposed that the bays would be surfaced using a grass reinforcing system.
 13. Indicative details of landscaping and boundary treatment have been submitted. This includes planting of a new hedgerow (on the north western boundary to replace existing leylandii hedge), tree and shrub planting, wild flower planting and seeding, and amenity grass areas

Planning Policy

14. In ODPM Circular (11/2005), the Government's commitment to the principles of the Green Belt and to maintaining tight planning controls over development on Green Belt land has been reaffirmed. It is expected that all planning applications for development in the Green Belt be subject to the most rigorous scrutiny, having regard to the fundamental aim of Green Belt policy as set out in Planning Policy Guidance note 2. That is to prevent urban sprawl by keeping land permanently open. The openness of Green Belts is considered to be their most important attribute and therefore there is a general presumption against inappropriate development, which is by definition harmful and should not be permitted, unless it can be justified by very special circumstances.
15. The Development Plan Policies summarised below are relevant to consideration of the application:
 - (i) The adopted 2006 **Kent & Medway Structure Plan**:

Policy SP1 States that the primary purpose of Kent's development and environmental strategy will be to protect and enhance the environment and achieve a sustainable pattern and form of development.

Policy NR5 The quality of Kent's environment will be conserved and enhanced. This will include the visual, ecological, geological, historic and water environments, air quality, noise and levels of tranquillity and light intrusion.

Development should be planned and designed to avoid, or adequately mitigate, pollution impacts. Proposals likely to have adverse implications for pollution should be the subject of a pollution impact assessment.

In assessing proposals local authorities will take into account:

- (a) impact on prevailing background pollution levels; and
- (b) the cumulative impacts of proposals on pollution levels; and
- (c) the ability to mitigate adverse pollution impacts; and
- (d) the extent and potential extremes of any impacts on air quality, water resources, biodiversity and human health.

Development which would result in, or significantly contribute to, unacceptable levels of pollution, will not be permitted.

Appendix 1 to Item D5

Application for an integrated highways depot, London Road, Wrotham – TM/06/2342

- Policy QL1 Requires that all development should be well designed and be of high quality. Developments, individually or taken together, should respond positively to the scale, layout, pattern and character of their local surroundings. Development which would be detrimental to the built environment, amenity, functioning and character of settlements or the countryside will not be permitted.
- Policy EN4 Seeks protection for Kent Downs and High Weald Areas of Outstanding Natural Beauty. The primary objective will be to protect, conserve and enhance landscape character and natural beauty. Major commercial development will not be permitted unless there is a proven national interest, and a lack of alternative sites. Major commercial, mineral or transport infrastructure developments will not be permitted unless it can be demonstrated that:
- (a) there is a proven national interest;
 - (b) there are no alternative sites available or the need cannot be met in any other way; and
 - (c) appropriate provision can be made to minimise harm to the environment.
- Other development which would be detrimental to the natural beauty, quality and character of the landscape and quiet enjoyment of the area will not be permitted.
- Development that is essential to meet local social or economic needs should be permitted provided that it is consistent with the purpose of Areas of Outstanding Natural Beauty.
- Policy EN5 Seeks protection, conservation and enhancement of the quality of the landscape in Special Landscape Areas whilst having regard to the need to facilitate the social and economic well-being of the communities situated within them.
- Policy E9 Seeks to maintain tree cover and the hedgerow network. Additionally, states they should be enhanced where this would improve the landscape, biodiversity, or link existing woodland habitats. Ancient and semi-natural woodland will be protected and, where possible, enhanced.
- Policy SS2 Sets out a general presumption against inappropriate development within the Green Belt. Further states that new building should accord with the provisions of PPG2 and Annex B of PPG3.
- Policy SS8 Non-residential development in rural Kent other than at rural settlements should:
- (i) be demonstrated to be necessary to agriculture, forestry, the winning of minerals or other land uses for which a rural location is essential; or
 - (ii) be the re-use, adaptation or redevelopment of an existing rural building or institution, where the change is acceptable on environmental, traffic and other planning grounds; or
 - (iii) provide a public facility for which a rural location is justified; or
 - (iv) allow for business development in accordance with Policy EP7(ii) or the business diversification of an existing farm in accordance with Policy EP8.
- Policy TP3 States that local planning authorities should ensure that development sites are well served by public transport, walking and cycling, or will be made so as a result of the development. Travel Plans should be established for larger developments that generate significant demand for travel to promote the use of these means of transport.

Appendix 1 to Item D5

Application for an integrated highways depot, London Road, Wrotham – TM/06/2342

Developments likely to generate a large number of trips should be located where there is either a good choice of transport already available or where a good choice can be provided in a manner acceptable to the local transport authority.

Policy TP12 State that development will not be permitted which involves either the construction of a new access onto the local transport authorities' primary or secondary road network or the increased use of an existing access, where a significantly increased risk of crashes or traffic delays would result, unless appropriate measures to mitigate the effect of development have been secured.

Before proposals for development are permitted, the local planning authority will need to be satisfied that any necessary transport infrastructure, the need for which arises wholly or substantially from the development, are in place or certain to be provided.

Policy TP15 States that development which generates significant increases in traffic, especially heavy goods vehicles, will not be permitted if it is not well related to the primary and secondary road network, or if it would result in a significant increased risk of crashes or traffic delays unless appropriate measures to mitigate the effect of the development have been secured.

Policy TP19 States that development proposals should comply with vehicle parking policies and maximum standards adopted by the County Council.

(ii) The adopted **Tonbridge and Malling Borough Local Plan:**

Policy P2/16 Long-term protection will be given to the Green Belt. Development outside the built up confines will not be permitted unless acceptable under the terms of other policies of the plan, or otherwise exceptionally justified.

Policy P3/5 Gives priority to the conservation and enhancement of the natural beauty of Areas of Outstanding Natural Beauty including landscape, wildlife and geological features, over other planning considerations.

Policy P3/6 Gives priority to the conservation and enhancement of the natural beauty of Special Landscape Areas.

Policy P4/11 Development must not harm the particular character and quality of the local environment, and wherever possible should make a positive contribution towards the enhancement of the area. The Policy also sets out a list of criteria to be met that includes built form and its relationship to site context, development being of a high quality in terms of design, detailing and use of materials, regard to principles contained in Kent Design, regard to good practice relating to daylight and sunlight, security issues, and the need to for landscaping proposals and amenity areas as appropriate.

Policy P7/17 States that development proposals which would lead to a significant increase in traffic or the number of heavy goods vehicle movements will only be permitted where the proposal would not lead to conditions harmful to road safety and where there is evidence that the traffic generated can be adequately served by the highway network. Where significant traffic effects are identified, appropriate mitigation measures must be provided.

Policy P6/18 Includes a list of sites within the Green Belt for redevelopment including Nepicar Area: East, London Road, Wrotham, part of which covers about half of the application site. The policy states that

Appendix 1 to Item D5

Application for an integrated highways depot, London Road, Wrotham – TM/06/2342

proposals will only be permitted where an overall improvement in the environment is achieved and subject to a list of criteria being met, covering impact on the openness of the Green Belt, contributing to the objectives of its inclusion in the Green Belt, having regard to the features of the landscape, and an improvement to visual amenity. In addition proposals for a sensitive redevelopment should incorporate a high quality of design and appropriate scale of development sympathetic to the landscape setting in order to integrate the development into the area. Satisfactory access must be provided and appropriate measures should be taken within the site to ameliorate road traffic noise.

Policy P7/18 Provision for parking.

Consultations

16. **Tonbridge & Malling Borough Council** – raises no objections subject to the following:

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

Wrotham Parish Council has commented on the application as summarised below:

The Parish Council is concerned that much of the justification for the planning proposal is based on the fundamental principle that "The whole application site is previously developed land." In this respect, draws attention to evidence that land at the north eastern end of the site was surfaced as hard standing sometime during 2004 without the benefit of planning permission. Furthermore points out that it is clear from an aerial photograph in the Landscape and Visual Assessment that this area of the site at the time was grassed over. Considers that it would clearly be a miscarriage of all planning regulation if a planning violation by a previous, but recent, owner was allowed to unduly influence a new planning application.

Comments that the height of the proposed buildings greatly exceeds that of the small single storey dwellings on adjacent roadside sites. In fact the height of the salt store,

Appendix 1 to Item D5

Application for an integrated highways depot, London Road, Wrotham – TM/06/2342

which is wholly located in the MGB is 14m which is equivalent to a 4-storey office block. It would be situated to the north east of the site, which is closest to the North Downs escarpment. Such is its height, size and bulk that it is inevitable that it will be visible to walkers on the Pilgrims Way and for many miles around.

Comments that the proposed development is 5 times more intensive in terms of building density and of far greater height than existing structures and even the area of parked vehicles would have a greater footprint than existing structures.

Notes that either side of this site is an existing line of 9 residences which would be dwarfed by the intensive and disproportionate development that would be completely out of character in this rural residential environment.

Comments that there are some inconsistencies in the application documents including references to utilising green roofs which appear to be an aspiration when in fact what is actually specified is mid grey PVF coated aluminium. It is also unclear whether or not solar panels are included.

Considers that the proposed development does not conform to the Local Plan both in the area covered by Policy 6.18(d) and the area covered by policies: Countryside Protection P2/16, Areas of Outstanding Natural Beauty P3/5, Special Landscape Areas P3/6. The proposed development is therefore inappropriate and could only be justified in the Green Belt by exceptional & Very Special Circumstances. In addition Policy ENV3 requires a proven national interest and a lack of alternative sites. MGB3 sets a strong presumption against such development.

Alternative Sites

Considers that the criteria by which alternative sites have been evaluated and other sites rejected is flawed and designed to arrive at the conclusion that the only suitable site is the one that Kent Highways had previously purchased. The Parish Council representation discusses assessment of alternative sites in some detail but in summary it considers that the analysis is flawed for the following reasons:

- A greater assessment of available sites should have been considered.
- More consideration should have been given to the various judgement criteria.
- A model should have been developed for properly weighting criteria in line with actual operational needs and taking account of Governmental advice on planning criteria and sustainability.
- Consideration should have been given to the possibility of ground water contamination.

Sustainable Travel Locations

Comments that the selection of a Green Belt site, away from local communities, has resulted in a location, which is very difficult to reach, except by car, as admitted in the Travel Assessment. The lack of a canteen would result in additional use of vehicles to get to local facilities that provide food at lunch times. Obviously the design has had to reflect the reality of the location and accommodate most of the staff travelling to work in their cars, hence the provision of large numbers of car parking bays. The Parish Council does not consider that car sharing is realistic or a practical alternative to good public transport services, and that the excessive parking is a tacit admission of this.

Site Access

Comments that entrance is constricted by the adjoining NHS care home and is only 6.7 metres wide measured at the point just after the holding area. Therefore staff cars,

Appendix 1 to Item D5

Application for an integrated highways depot, London Road, Wrotham – TM/06/2342

HGV lorries and HGV gritting vehicles will share a two way access which is only 3.35 meters wide with oncoming traffic and no separation of lanes. Further comments that it has been given very little time to assess this application but are very concerned about the safety of the proposed access given the severely restricted width. The 6.7 metres access must be capable of accommodating cyclists and potentially two HGV's all in opposing directions. This is particularly important given the high volume of use of the junction during the AM and PM peak periods. On a preliminary assessment having referred to particular guidance it considers that 4.2 metres is the minimum width necessary to allow a bicyclist and motorist to share the same lane without coming into conflict, changing lanes, or potentially reducing the motor vehicle capacity of the lane. Furthermore it considers a safe pedestrian entrance on either side of the road is needed as staff could be walking from either direction. With the frequency of peak vehicle access, they will need dual pavement access and a safe means to cross the entrance road, as at present there appears to be only one pedestrian access. It also considers that this constitutes significant intensification of use of a non-conforming access onto a primary distributor road.

Environmental Impact Assessment

As the site is within the North Downs AONB, the Parish Council is of the opinion that the applicant should have conducted an Environmental Impact Assessment and included an Environment Statement with the application to fully evaluate the environmental implications of the proposed development. It also considers that the applicant would have been better advised if they had requested a scoping opinion from the determining authority.

Bio-diversity

Considers that biodiversity has not been dealt with adequately and comments that it is a material planning issue that must be considered before an application can be determined. Also that as an integral part of an Environmental Statement, surveys should have been carried out to determine what species of flora and fauna are present. For example, there is a pond on the site that may contain Great Crested Newts, a European Protected Species, but the applicant has not been forthcoming with this data.

Site Archaeology

The applicant has not provided adequate information or carried out an archaeological assessment in accordance with Kent & Medway Structure Plan and considers that the application cannot be determined without, particularly as archaeological remains have been found in the vicinity of the London Road and close to the application site.

Ground Water Contamination

As an integral part of the Environmental Statement a study to determine the possibility of ground water contamination should have been included. The site has aquifers that have resulted in a pond, and a water drain runs from the site. The area is a network of fresh water streams and drainage ditches. The potential for ground water contamination from storage and handling of salt, brine and fuel and from vehicle washing detergents is high. Therefore it is essential to fully address the impact on the groundwater and surface water systems during the construction and working phases of the development.

In addition the site has had a number of unconsented activities taking place over a number of years. This lack of regulation and scrutiny could easily have given rise to activities that have contaminated the ground soil with the potential to further contaminate important aquifers. There is little comment in the application of substance. Soil contamination surveys need to be carried out.

Appendix 1 to Item D5

Application for an integrated highways depot, London Road, Wrotham – TM/06/2342

Without the information regarding potential contamination the Parish Council cannot be satisfied that the impacts of the proposed development could be fully assessed and therefore adequately mitigated, and considers it would be unacceptable to determine the application without it. The applicant has specified salt tolerant plants which is a tacit admission that contamination is likely to occur. The Parish Council therefore considers that the proposal would be contrary to Policies NR4, 5 and 7 of the Structure Plan.

Wind Turbine

Questions why the Design Statement refers to energy being generated by a wind turbine, why it does not appear on the plans and if it would create noise for the local residents?

Exceptional and Special Circumstances

The Parish Council has questioned in some detail the basis for the applicant's case for locating at the application site.

Other comments made in addition to the above in the Parish Council's conclusion, include:

The proposal is inappropriate and the applicant has failed to put forward a case for 'very special circumstances'. In addition considers that the alternative site survey was not conducted in a professional manner and it is not possible to determine if there are more appropriate locations. States that consideration should be given to distributed sites linked by networked computer systems and suggests that Kent Highways employ consultants to review their business plan.

The Parish Council would need considerably greater information before it can properly come to a conclusion regarding the suitability of the Wrotham site.

Question whether a single depot can service roads all across west Kent without hugely increasing lorry travel compared to the present arrangements, and whether it is sensible to have the depot at the foot of Wrotham Hill which can get blocked so easily in snow conditions. Comments that these aspects have not been considered in the submission.

Overall the Parish Council "thinks this is an incompetent application that is only worthy of outright refusal. In addition the significant omissions preclude KCC from further consideration."

Environment Agency has no objection to the application subject to the following:

- Note that no details have been provided but comment that all foul and surface water is discharged to the main public sewer.
- Particular conditions being imposed covering foul and surface water drainage, all surface water drainage from roads, parking areas and hard standings being passed through an oil separator and trapped gullies.
- Has several areas of concern in relation to depot activities and enclosed Pollution Prevention Guidelines for Highway Depots, for the applicant to take into account. Comments that written approval is required from the Environment Agency for any discharge of sewage or trade effluent into controlled waters and similarly may be required for discharge into waters which are not controlled. Also comments that such approval may be withheld.
- Comments that the previous use may have left contamination and could impact on the proposed development. The Agency recommends that, prior to determination, a desktop study be carried out which shall include the identification of previous uses,

Appendix 1 to Item D5

Application for an integrated highways depot, London Road, Wrotham – TM/06/2342

potential contaminants that might reasonably be expected given those uses and other relevant information. If the study identifies that contamination may be a problem then the Agency recommends that suitable conditions be imposed relating to site investigation, risk assessment and remediation Method Statement.

- Any contamination or odorous material encountered should be investigated and the Planning Authority informed.

Divisional Transportation Manager has commented as follows:

The site has an existing access from London Road (A20) which is to be modified. Approval of this is to be subject to the safety audit procedure.

Location

Located on the north side of the A20 between the A227 to the west and M26/M20 junction to the east with easy access to the A25 and Seven Mile Lane B2016 this site is very well suited to serve as an operational highway depot serving the West Kent Districts of Sevenoaks, Dartford, Gravesham and Tonbridge and Malling.

Traffic generation.

Given the range of uses declared by the former owner of the site it would not be unreasonable to consider the proposed use as being comparable with the former uses, in terms of staff, traffic type and working practices.

With some 150 members of staff being employed at the site and little if any local facilities within walking or cycling distance of the site TRICS would suggest that 3.7 movements per member of staff would not be unreasonable figure to apply given the transient nature of the employment. Approximate figures suggest that of the order of 550-600 movements in a 24hour period can be expected. Of these there are likely to be 25 - 30% of those movements in the am and pm peak periods, 140 - 200. It is noted that the Transport Assessment has not raised concerns regarding turning movements from the site. I would suggest that a stage 1-2 Safety Audit would raise concerns given the close proximity of other accesses in the vicinity and that egress from the site is restricted to left turn only.

Sustainability

The submitted Travel Assessment sets out the constraints of the site and as previously stated the site is ideally located with regards to operational requirements. It is recognised that the site is not directly accessible by public transport and the numbers of staff accessing the site by foot or cycle will be limited. It suggests that a system of car sharing be introduced and maintained to minimise the number of car trips to and from the site.

Options for transporting staff and visitors from existing public transport facilities including Borough Green railway station are to be explored. The options being considered include extending or diverting existing bus services, providing some form of mini bus shuttle to the railway station, organised lifts and or the use of taxis. These options will be fully assessed in terms of cost effectiveness and sustainability in the light of the staff travel needs survey and the on going operation of the site.

The full Travel Plan package is to be regularly reviewed to ensure that the number of cars parking at the site is broadly consistent with the stated Travel Plan targets and that parking is contained within the curtilage of the site.

With regard to visitors it may well be appropriate for officers to arrange to meet potential visitors at other offices or on site. Provision is being made for visitor parking but for those without access to a private car the County Council should be seen to be making services accessible to the public. It could in special circumstances involve officers arranging for visitors to be picked up from the railway station or other convenient

Appendix 1 to Item D5

Application for an integrated highways depot, London Road, Wrotham – TM/06/2342

locations and meetings be arranged on site or offices is to be encouraged where linked journeys make it more sustainable.

Information sheets should be provided for potential visitors together with information on the KHS web site to include web links.

Parking

Parking is to be provided in accordance with the latest Government and County Council guidance and the provision of 127 spaces for staff and visitors represents those aspirations, coupled with secure cycle and motorcycle provision. The parking of operational vehicles in the main is to be provided undercover. The separation of the operational parking and private vehicle parking is to be welcomed though the parking area at the entrance of the site should be reserved for operational staff only to minimise the potential movements arising in the am and pm peaks. It will be essential that a full scheme of signing be submitted prior to occupation.

Summary

The proposal is for the site to be operated as a highway depot and Area office to serve the West Kent area. Its location gives immediate access to the highway network that serves the West Kent area of Dartford, Gravesend, Sevenoaks and Tonbridge and Malling. The site is not readily accessible by public transport though sufficient links within a 5km range exist such that with compliance with a Travel Plan this site should be considered as sustainable within the area the depot is required to serve.

The site has operated in the past in the form of storage and distribution operating on a 24 hour basis since 1950s. The last uses were somewhat varied having been occupied by independent users. As such various uses of workshops and storage and distribution would be similar to the proposed use the main difference being a likely reduction in large goods vehicle movements and increased private vehicle movements, this is to be welcomed but it is suggested that the egress from the site should be left turn only and I shall require the submission of details and stage two Safety Audit.

Subject to the imposition of the conditions to safeguard parking, access and circulation within the site. The requirement to produce and regularly review a travel plan, produce a scheme of signing and lighting for approval. I raise no objections.

The County Archaeologist has requested that a condition be imposed requiring a watching brief.

Jacobs Babbie (Environmental Science) has commented as follows:

“I have been verbally advised that the Chipping Storage and Hot Boxes are to be relocated northwards to where there is open storage. I have not seen any plans yet with this revision marked. My comments are however based on the revised scenario.

Construction Noise

I am satisfied that noise from the proposal can be adequately controlled by condition to restrict hours of noisy construction work in order to reduce impact on amenity for the closest noise sensitive receivers. It is useful to note that Tonbridge and Malling Borough Council has a different set of “core hours” during the week (i.e. 0730 hours to 1830 hours Monday to Friday) that they expect noisy construction work to be adhered to within their Borough, to those proposed by the Applicant.

Operational Noise

With regard to night-time working on the site, the Applicant has only made mention of up to 12 gritting units departing from the site per hour in times of adverse weather. There is no mention on whether these vehicles will be loaded during the night, or

Appendix 1 to Item D5

Application for an integrated highways depot, London Road, Wrotham – TM/06/2342

preloaded during the previous day; nor of the predicted noise levels at the closest housing when this loading occurs. This potential impact of loading operations should be assessed.

The arrival and departure of the gritting vehicles are stated to generate maximum noise levels of 70 dB L_{Amax} at the nearest noise sensitive receiver. In order to minimize sleep disturbance the WHO state that noise should be limited to less than 60dB L_{Amax} . It is however noted that the existing L_{Amax} levels are in excess of 60dB L_{Amax} throughout the night time period. As such, the departing of gritting vehicles is unlikely to give rise to a detriment in amenity to the nearest noise sensitive receivers.

There is no mention of any other night time activities occurring on the site. The Applicant should be requested to confirm that there will be no other night time use of the depot. No assessment has been undertaken for any deliveries occurring at night time. If these are envisaged, more details will need to be provided. Any potential night time activity must take into account the WHO sleep disturbance criteria.

I am not satisfied that the noise from reversing alarms has been adequately assessed. It is stated that they will be kept to a minimum, but this is not quantified at all. The applicant should demonstrate that this activity (which can be very disturbing) will not detrimentally affect the amenity of the noise sensitive receivers adjacent to the site.

Air Quality

I have looked at the predictions of nitrogen dioxide and particulate matter with the proposal in operation. The slight impact caused by the increase in vehicles on the road network would not be measurable. There should therefore be no detriment to amenity through air quality emissions from the site.”

In response to concerns raised by the Parish Council on the previous application has commented as follows:

“I note that the Parish Council raised a concern on air quality at this site due to looking at nitrogen dioxide diffusion tube data for a location 1km away. The Parish Council had concern that NO₂ concentrations appeared to be increasing within their parish area. My investigations show that the years of concern were 2003, which is known to be a high pollution year and 2004, where a tube supplier change led to significantly higher results being obtained. 2005 data, not shown by the Parish Council indicate lower levels once again being achieved (38 $\mu\text{g}\text{m}^3$).”

Jacobs Babbie (Landscape) has made a number of detailed comments, including the following:

“Visual Effects of the Proposed Development

The current proposals are now accompanied by a Landscape Assessment and I have visited the elevated scarp face within the Area of Outstanding Natural Beauty (AONB), which I had previously assessed as having a high potential for views of the site. However I would concur with the submitted Landscape Assessment that the site is well screened by intervening vegetation and that the strong network of woodland and hedgerows north of the site helps to integrate the site into the landscape. Most importantly it is at sufficient distance from elevated viewpoints and elevated public footpaths (at least 1.5 km) that significant adverse effects on views are not possible. Similarly any indirect effects on the Special Landscape Area (SLA) would not be significant.

Appendix 1 to Item D5

Application for an integrated highways depot, London Road, Wrotham – TM/06/2342

At close range the site is seen either in the context of the existing surrounding development or there is sufficient intervening vegetation to largely screen views of the development. However the height and scale of the proposed buildings is somewhat larger than existing buildings and some nearby properties are likely to experience a moderate degree of visual intrusion. Whilst this can be softened to some extent by new planting, it is unlikely to be mitigated entirely.

Impact on Trees and Vegetation

The site is bounded by a number of hedgerows and trees of various sizes, which are important to its landscape setting. The most visually significant and important vegetation is located around the northern boundary where the site is surrounded by open countryside in the ownership of the National Trust. Proposals here are confined to roads/parking. The use of porous asphalt and reinforced grass will help to ensure that the area below the tree canopy is conducive to root growth, although for this to be fully successful levels should not be reduced within the area of the canopy. The recreational footpath impinges on the canopies of some trees and the alignment of this footpath should be adjusted to avoid them.

The hedgerows along the western boundary, mostly of *Leylandii* conifers, would be removed and replaced with more ecologically desirable species, although at the northern end by the Open Storage area there is the opportunity to retain the existing native hedge. On the eastern boundary trees are outside the site and at sufficient distance that they should be unaffected.

There are proposals to provide additional planting on site, to increase the width of boundary planting, especially around the car park area.

Green Belt Effects

There would be loss of openness within the Green Belt, at least within the northern half of the site. The loss of openness within the Green Belt needs to be weighed against the policy considerations and the 'special circumstances' of the development.

Landscape Effects

There would be a slight direct effect on the AONB, in terms of built development extending further into the protected area (i.e. the redevelopment of the northern sector). As discussed this would not be significantly adverse visually and the most valuable elements, the existing native trees and native hedgerows, would be retained. Indirect impact on the SLA is also low.

Any slight adverse landscape effect on the AONB needs to be balanced against the development criteria as discussed earlier.

Conclusion and Recommendations

Clearly landscape policy supports the conservation of the landscape above that of development, especially where the development would be harmful to the landscape.

From important elevated viewpoints within the AONB the site is well screened by intervening vegetation and is at sufficient distance that significant adverse effects on views are unlikely. Similarly any indirect effects on the SLA would not be significant. There would however be moderate adverse impacts on nearby residential properties, which could not be entirely mitigated. There would also be more intense built development within the AONB. These adverse effects need to be carefully balanced against other planning considerations.

Appendix 1 to Item D5

Application for an integrated highways depot, London Road, Wrotham – TM/06/2342

Apart from the leylandii hedgerow along the western boundary, most of the significant site vegetation can be retained, provided that level changes in the vicinity of the vegetation are not significant. If the application were to be approved, this could be dealt with through a suitable condition requiring tree constraint and protection plans (BS 5837: 2005) and full details of levels, layout and construction details. Full details of planting and aftercare would also be necessary.”

West Kent Shared Services Agency of the NHS (owners of the adjoining Care Home – Bellaville) – views awaited (but raised no concerns about the previous application).

Local Member

17. The local County Member, Mrs Valerie Dagger, was notified of the application on the 10 July 2006.

Publicity

18. The application was publicised by an advertisement in a local newspaper, the posting of a site notice and the individual notification of 6 neighbouring properties. As the site is within the Metropolitan Green Belt the advertisement and site notice indicate that the proposed development does not accord with the provisions of the development plan in force in the area in which the land to which the application relates is situated.

Representations

19. I have received 4 letters of representation from local residents, 2 from neighbouring properties. The concerns raised/comments made include those below, and where relevant are covered in the discussion section:
 - Notes that the height of office block is reduced from the outline application, but comments that the site and usage of the site is still greater than any which was there previously.
 - There has never been a building on the site where the office block is to be situated; also the salt barn is beyond the existing building line, higher than any building in the immediate area and would be an eyesore. When the leaves are off the trees it will be very visible to travellers on the M26, embankment and crossing the bridge.
 - Have a grave concern that there may be 24hour usage, which would be intolerable to the residential dwellings bordering on the site.
 - Concerned for a family member that stays at the weekend, 70% of the year who would be affected by any sudden or loud noise, which will cause her to go into a muscular spasm, particularly when woken from sleep at night. On several occasions this has caused her to bite through her tongue and quite long spells in hospital.
 - Concerns regarding salt leaking into the surrounding land. Questions whether or not the lake is to be used for the lorry-wash plant. Concerned that even with a filter plant some salt would find its way into the stream, which crosses the site. The stream previously became polluted with oil when lorry washing took place on the site.
 - Comments that there is frequently heavy traffic congestion at peak times very often associated with stationary traffic on the M26. Also that there is no usable bus service on this section of the A20 and notice the reluctance to run a mini-bus from the station on cost grounds and considers it would have limited use any way. Questions therefore whether there would be sufficient parking on site as a result of

Appendix 1 to Item D5

Application for an integrated highways depot, London Road, Wrotham – TM/06/2342

most people having to travel by car and consider that the traffic congestion would be made worse. Comments that the lay by opposite would become an overflow car park, as will their service road which serves 3 residential properties where there is already a problem caused by commuters.

- Whilst not totally opposed to the proposal consider that too much is being pushed into a small site and would like to see it scale down, fitted more sympathetically into the landscape with no night time working.
- Comment that the site has not legally been in constant use, and the illegal use has caused a nuisance and the police have had to be called on many occasions. Due to this have had to erect a fence to separate the two properties. Note that the application for a Certificate of Lawful Development for B1, B2 & B8 uses was withdrawn.
- Notes that the site is in the Metropolitan Green Belt and an Area of Outstanding Natural Beauty.
- What is proposed is about 3 times the size of the combined footprint of the existing buildings. Trusts that the building that does not have planning permission has not been included to justify the new development.
- The site is going from a storage yard to a 24hour/7day week full-blown industrial yard. The disturbance will include flashing lights, noise, car doors opening and shutting especially during the evening when roads are salted and most maintenance is carried out.
- The area where the office would be is going from an open space and being able to see the sun rise, to a 10 metre high building which will block the complete view and light from their kitchen window and garden. The garage building would block the view and light to the bedroom window.
- The salt barn at 14 metres high will be a blot on the landscape, block the sky, views and light etc.
- Concerned about contamination of garden, effect on wildlife, and pollution of stream from the salt including arising from being wind blown.
- The parking is mainly located on the Green Belt land where shrubs and trees should be to absorb the natural water. Their garden already gets flooded from the extensive hard standing on the site and it being higher than their garden.
- It seems that the site is not large enough to cope with the proposed development. Concerned that there will not be enough car parking.
- No mention is made about the need to sprinkle dust over melting roads in hot weather.
- Note that the Areas of Outstanding Natural Beauty receive the highest level of protection and express concern that all planting schemes take years to establish. Questions the accuracy of the Visual Assessment. Also comments that the buildings will be more clearly seen when the leaves are not on the trees.
- The site is not suitable because the salt barn and part of the office building are outside the area designated in the Local plan for redevelopment. The development would take away the complete openness of the site and does not comply with Planning Policy Guidance on Green Belts. There is no point in having planning regulations if they are not abided by. This development could set a precedent resulting in no Green Belts being left.
- Notes that siting of major industrial or commercial development within Areas of Outstanding Natural Beauty will not be permitted. Disagrees with the applicants that this is not a major development.
- Given the location of the site it is not possible to reduce reliance private car use and considers the development will increase the need to travel.

Appendix 1 to Item D5

Application for an integrated highways depot, London Road, Wrotham – TM/06/2342

- The traffic generated by the development in this location would cause congestion, pollution and environmental damage. Asks what mitigation proposals are going to be put in place to address these. Also comments that there will be a significant increase in traffic and therefore the application should be refused. relating to transport impacts
- Concerned about impact on wildlife from construction and operation of the depot.
- The proposal would not enhance anything other than causing a blot on the landscape, destroy the neighbouring houses quality of life by 24 hour/7 days a week pollution, noise, activity, etc.
- Concerned about impact on their property when 95% of their garden runs along side the site with direct views of it. Also comment that there are no buildings adjoining it.
- Finds it hard to believe within Kent there are no suitable alternative sites and also suggest some other locations along A20 that they consider more suitable.
- Asks how often the retention pond would be cleaned and what is going to happen to stream and existing pond. Asks for drainage proposals for the whole property.
- There is no information on security and fencing.
- There is no in depth report on how the work is to be carried out. Also ask about Method Statements, Risk Assessments and Health and Safety Assessment.
- Also concerned about there not being enough room for site offices, plant machinery, parking of contractor's and employees vehicles etc. during construction
- Concerned about security because the site has had many intruders in the past, which has affected their property.
- Concerned about dirt being taken onto the road arising from construction activities.
- Conclude by saying they totally disapprove of this application and under no circumstances are prepared to live next door to a 24 hour/7 days a week working industrial yard they never moved next to when they purchased their property.
- Opposes it because it is an inappropriate development in this residential and rural spot - the site being in the green belt, in an area of outstanding natural beauty and in a special landscape area. I oppose it because the development would be contrary to all relevant plans and central government guidance and because no special case has been made to override the good sense behind those plans and guidance.
- This is predominantly a residential area surrounded closely by countryside. In addition to the houses immediately adjoining, there are many other houses, which would be affected. There are also two Listed buildings in the vicinity - and, additionally, three of the houses date from several centuries ago. The noise and pollution (including throughout the night) which the development would involve is unreasonable in such a residential area.
- As the current entrance to the site is fairly narrow, there is currently no interference with the rural ambience but as the proposal involves demolishing one of the houses the industrial nature would be all too obvious from the road.
- As Wrotham Hill (used by walkers) rises behind the site, the development would be clearly visible also from the rear.
- The development would be against the Special Landscape Areas and Green Belt and Areas Of Outstanding Natural Beauty Policies and, for various reasons, not in accordance with PPS1, PPS2, PPS7, PPS11, PPS13, PPS23 and PPS24. It also would not accord with the Kent Structure Plan or the Local plan.
- Finds it totally inconceivable that in the whole of Kent the Council could not find an alternative site which would not be contrary to all those plans, policies and guidance – and opposes the application also because of inadequate consideration of other locations.
- It would seem far more sensible to have a site towards the centre of the relevant area. There would be a waste of energy and unnecessary pollution from vehicles

Appendix 1 to Item D5

Application for an integrated highways depot, London Road, Wrotham – TM/06/2342

travelling to and from this site. It is irrelevant that there are motorways to the north of the site when the area being served is to the South.

- The applicant has got anywhere near making out any case for 'exceptional and special circumstances' such as to override the plans, policies and guidance mentioned above. Has seen the representations made by Wrotham Parish Council on this point and agrees with them.
- Also, mentions another aspect of the water problem identified in the Parish Council's representations. When a road further up Wrotham Hill was being built, there were serious problems with water and springs. Also, twice in the last ten years water spouted unexpectedly from the Hill and flowed onto the London Road.
- Concurs with the representations from Borough Green Traffic Action Group and Keep Borough Green as well as those of the Parish Council.
- Concerned at the noise [both from lorries coming and going from the site and also the site itself - such as from the proposed wind turbine], the vibration from passing lorries and the fumes and the pollution which the development would mean.
- Suggests that it would make more sense to have several smaller localised depots than to have the large facility proposed. Does not consider adequate explanation has been given for having all the office workers at the depot site.
- Concurs with other objections made to the proposal. Considers there must be other locations that would not be so contrary to planning policy and guidance and does not consider an adequate search has been made or consideration given to other ways of working.

20. In addition to the above I have received two further representations, one from 'Keep Boroughs Green' and the other from 'Borough Green Traffic Action Committee'. The concerns raised/comments made include those below, and where relevant are covered in the discussion section:

Keep Boroughs Green

- In effect Kent County Council is the determining authority on its own planning application and one that is contrary to planning policy, it is therefore an obligation for the Planning Applications Unit to be rigorous in its determination of the application.
- The proposal is massively over intensive in size and form and will be very ugly in its essentially residential, rural setting. In particular the 14-metre salt barn to the rear of the site is particularly hideous and is destined to become a local landmark for all the wrong reasons, if consented. It is very unfortunate that it will clearly be seen from the North Downs, which is why the area is designated MGB, (to the rear of the site), AONB & ASLI.
- The frequent HGV movements caused by the depot and the road gritting service will generate dust, chemical and most of all noise pollution, particularly within the site. Air brakes, reversing beepers and large salt filled vehicles will make life hell for local residents and the NHS care home that is engulfed by the proposed site. The plant is designed to operate through the night, which will be particularly annoying in terms of noise and light pollution.
- As the development would be inappropriate, the nub of the matter is whether the applicant has clearly demonstrated that the claimed efficiencies are enough to override all planning constraints in this sensitive area.
- Bearing in mind gritting operations questions why is it essential to have all of Highways office staff located in an adjacent building since most of the time they will have gone home to bed? We live in a time of distributed network computer systems and it is for the applicant to clearly demonstrate what business process makes particularly office and gritting operations essential to co-locate.

Appendix 1 to Item D5

Application for an integrated highways depot, London Road, Wrotham – TM/06/2342

- KCC Highways have purchased a site that is just capable, though over intensive development, of cramming all of their operations in and now seek to justify this by an exceptional circumstance of alleged efficiency in operations.
- The applicants justification is completely inadequate and any alleged benefit should be properly justified by business process analysis carried out independently by experts. In particular the need to co-locate office and gritting functions should be examined closely because this reduces the number of available sites drastically and would appear to be of relatively little benefit.
- The ES is lacking essential information as follows: -
 1. Biodiversity study/habitat for protected species needs to be assessed in advance of determination.
 2. Archaeological survey.
 3. Groundwater Contamination Survey. The site is crossed by aquifers and fresh water drains and the risk should have been fully assessed and mitigated by appropriate technology.
 4. Soil contamination survey, the unconsented activities on the site might have resulted in soil contamination.
 5. Why the applicant is specifying salt tolerant plants for landscaping?
 6. The alternative site survey was not carried out in a professional manner, the criteria are flawed and it was designed to conclude that the only site possible is the one already in KCC's ownership.

Borough Green Traffic Action Committee

- Concurs with the submissions of Wrotham Parish Council and Keep Boroughs Green.
- Questions why it needs to be located adjacent to a motorway junction when the use of the site specifically excludes motorway and A21 operations.
- What is the point of tucking the depot away in the northern corner of the County, rather than a central location?
- Because of the largely emergency nature of both Highway and Gritting operations, it makes far more commercial and operational sense to have a plethora of small strategically located depots, which can respond quickly to local problems. Modern communications now mean that on the spot management is unnecessary, and even to be discouraged.
- Concerned about salt being stored within half a mile of the local mid Kent Water pumping station, right on top of the aquifers that station draws from. The water table in this area is only a few feet below ground level, and if the depot is allowed we are looking at an imminent ecological disaster. No matter how carefully the site is run, there will be escapes of salt, and whilst a couple of tonnes are discountable from an operational point of view, it will wipe out the viability of Ford Lane Pumping station overnight.
- The unacceptable impact on the residential properties adjacent to the site, and the destruction of both an actual portion of Green Belt land, and the loss of the amenity value of that Green Belt land as part of the view from the North Downs.
- The depot would generate a large amount of extra traffic in an area that already suffers gridlock on a regular basis because of its strategic location, and would only exacerbate the traffic chaos that Borough Green already suffers because of the lack of a Bypass.
- Hopes that the KCC Planning Authority remains aware that they must maintain an arms length relationship with KCC Highways, and rely on the laid down planning guidelines to deliver an unbiased decision.

Application for an integrated highways depot, London Road, Wrotham – TM/06/2342

Discussion

Introduction

21. Although the application site, is set within an urban frontage it backs onto the countryside beyond. Its context is outlined in more detail in paragraphs (2) and (3) above. At first considering, it would appear that the proposal just involves the redevelopment of what is in effect a derelict and despoiled site. Indeed part of the site is identified in the Local Plan as being suitable for redevelopment and an overall improvement in the environment is sought subject to certain criteria being met. Furthermore by definition the whole of the site can be considered as 'previously-developed land' even if the north eastern part, bearing in mind the likely unauthorised surfacing of it, should be regarded as if it were an undeveloped grassed area. Since Annex C of Planning Policy Guidance Note 3 (which defines 'previously developed land') includes the curtilage of land attached to buildings as being part of the whole; the site should be treated as a single planning unit.
22. However, it will be noted that the whole of the site is within the Metropolitan Green Belt. Therefore, given that the extent of the proposed development goes beyond the Local Plan designation for redevelopment, and given the type of development, it has to be considered as inappropriate development within the Green Belt. It will therefore be necessary to consider the impact of the development on the openness of the Green Belt and whether or not this is outweighed by very special circumstances, in the light of Green Belt Policy. In addition the proposal also raises a number of other key issues. These include, the impact of the development on the landscape taking into account that the land is within the Kent Downs Area of Outstanding Natural Beauty and North Downs Special Landscape Area, the impact of the development on local amenity of residential properties, and local environmental impacts. Also, the impact of additional traffic generated by the development. These must be considered in the context of the Development Plan policies, referred to in paragraph (15) above, Government Guidance and other material planning considerations arising from consultation and publicity.

Metropolitan Green Belt

23. As already referred to, the proposal involves 'inappropriate development' within the Metropolitan Green Belt and it is necessary to consider the impact of the development on its openness and whether or not there are very special circumstances that would warrant setting aside the general presumption against the development. To my mind it is unquestionable that given the form, extent and nature of what is proposed the development would significantly impact on the openness of the Green Belt, even if in terms of its visual rather than physical presence it could to some extent be mitigated. In particular, the development would extend beyond the area of the existing buildings and the area outside of the land identified in the Local Plan as suitable for redevelopment. This includes part of the office and garage buildings, the salt barn and a large expanse of car parking.
24. Mindful of the Green Belt issues associated with the application site, particularly bearing in mind the need to demonstrate very special circumstances, the applicant goes into some detail about the background and need for the development and site selection process. The proposal arises from the re-organisation of the County Council's Highway service, including co-location of functions, and the need to provide a suitably located site to serve the West Kent Area as referred to in paragraphs (5) & (6) above. The applicant has stressed that the advantages of co-location derive from the highways staff

Appendix 1 to Item D5

Application for an integrated highways depot, London Road, Wrotham – TM/06/2342

performing various different functions being located together in one place, wherever that might be. The existing locations of offices and depots were deemed not to be suitable for a variety of reasons and therefore the applicants undertook a site search, initially identifying 50 potential sites for the proposed principal depots across Kent, prior to pursuing the proposals for the application site.

25. Ten of the sites referred to above are located in West Kent. To have been considered at all, sites needed to be located near the strategic road network, preferably trunk roads and motorways. Although proximity to the motorways is not in itself a requirement, since the Highways Agency remains responsible for their maintenance, and gritting, such proximity ensures easy access to the parts of the strategic road network for which the County Council is itself responsible. Whilst all qualified on this criterion, it did not mean that all were as equally well located.
26. The second consideration was the size of the site and its suitability to accommodate an office for 100-120 people, car parking and an operational depot. Four sites were eliminated at this stage, two simply because they were not large enough. A third, the existing Hayesden depot at Tonbridge, was discarded as too tight a fit. This depot is now proposed for redevelopment as a satellite to the application site. A fourth was eliminated as a result of uncertainties about other developments in the vicinity.
27. The suitability of the remaining six was evaluated according to the following criteria:
 - A location which will enable reasonable access for staff, public, members and contractors to access all parts of the division.
 - Costs of purchasing or leasing the site.
 - The perceived ease or otherwise of obtaining planning permission.
 - Site availability.
 - Suitability for sustainable travel planning.
 - Existence or otherwise of services.

The six were graded for each criterion. The first criterion, of location, was accorded substantially more weight than the others. The application site emerged as the most suitable, having by some way the best location, central to the West Kent Division. It scored well on all but one of the other criteria, but was acknowledged to be the least suitable in terms of sustainable transport planning owing to its essentially rural location away from any settlement of significant size. However, this disadvantage was considered to be substantially outweighed by the site's location advantage and it was concluded that the application site was the best located for the provision of highways maintenance services generally throughout the year and gritting in particular when required in winter. For these functions, the proposed development would effectively replace the Swanley depot, which is to be sold to the Highways Agency for its own use.

28. The applicant states that the very special circumstances derive from the need for the development, and then from the site selection process that led to the identification of application site as the most suitable site. Its central location in the West Kent Division and outstanding access to the relevant parts of the strategic road network, often by means of the nearby motorways, was the most important single criterion and no other site matched its location advantages.
29. The applicant further states that with the exception of a small part of Tonbridge and Malling Borough close to Maidstone, the whole of the West Kent Division, apart from its urban areas, is covered by the Green Belt. This area, on the eastern edge of the four

Appendix 1 to Item D5

Application for an integrated highways depot, London Road, Wrotham – TM/06/2342

Districts, which together make up the West Kent Division, is by definition poorly located in relation to the Division as a whole. It was therefore inevitable that a suitably located site would be in the Green Belt, unless an urban location could be found.

30. In my view, the reasons for the development and the need to locate with regard to the Strategic Highway network and central to the West Kent Division are logical and can be accepted. It is also probable that if there were an acceptable alternative it would also be located within the Green Belt. If that is the case, it must be preferable that any such development should then take place on a site where impact on the openness of the Green Belt would be minimised and in particular (to accord with Structure Plan Policy SP1) locations that do not rely on Green field sites. I consider that taken as a whole that would be true of the application site even though as acknowledged in paragraph (23) above, by definition the development would significantly impact on the openness of the Green Belt because it would effectively infill the whole site with development. However, it will be noted that about half of the site has been previously developed and is identified in the Local Plan as suitable for redevelopment and arguably is located within an area of/adjoining existing built (ribbon) development and curtilages. Some of which is non-residential, including the café adjacent to the site and petrol filling station about 160 metres to the north-west. In addition, boundary trees and hedgerow to some extent enclose the remainder of the site, where the impact on openness would otherwise be more extensive and intrusive on the countryside beyond.
31. Taking all the above factors into account I do not consider that an objection on the basis of the effects of the proposed development on the openness of the Green Belt would be warranted. Particularly, as I consider that very special circumstances have been demonstrated for overriding Green Belt policy constraints in this particular case. However, if Members are minded to grant permission, the application would have to be referred to the Secretary of State for Communities and Local Government for consideration. This is required under The Town and Country (Green Belt) Direction 2005 because the proposal involves inappropriate development that would significantly impact on the openness of the Green Belt.

Landscape/Visual impact

32. Bearing in mind the landscape policy context of the site and the main objective of Development Plan Policies to protect, conserve and enhance landscape character and natural beauty, and landscape quality, the applicants have prepared a Landscape and Visual Assessment to accompany the application and state that the development has been designed and laid out with this context in mind. The extent and layout of the proposed development, the height, scale and bulk of the buildings will be noted from the drawings and as otherwise referred to above. Landscaping proposals are also included that would provide for native tree and hedge planting together with retention of existing trees and hedgerows to assimilate the development into the landscape and protect views. In addition it is proposed that grass reinforcing system would be used for the parking bays and adjoining areas would be seeded with a wild flower mix. Given the expanse of parking this would help to minimise the visual impact compared to a completely solid paved surface. The landscape proposals are to be welcomed but it has to be acknowledged that the benefits of the tree and hedge planting in achieving the stated objectives would not be immediate.
33. Our Landscape Architect's views in paragraph (16) above will be noted. In particular, his conclusions, that:

Appendix 1 to Item D5

Application for an integrated highways depot, London Road, Wrotham – TM/06/2342

“From important elevated viewpoints within the AONB the site is well screened by intervening vegetation and is at sufficient distance that significant adverse effects on views are unlikely. Similarly any indirect effects on the SLA would not be significant. There would however be moderate adverse impacts on nearby residential properties, which could not be entirely mitigated. There would also be more intense built development within the AONB.”

Taking account of his assessment and the applicant’s case for the depot to be located at the site, I do not consider an objection on the basis of landscape/visual impact could be sustained. However if permission is granted, full details of the proposed landscaping would need to be reserved by condition, a condition imposed for its subsequent aftercare and maintenance, and conditions imposed covering tree protection and site levels.

34. It is also necessary to consider the design and appearance of the development more specifically. In summary, Development Plan Policies, require development to be well designed and to respect its setting. The layout of the site, relationship of buildings, circulation spaces and parking are logical and would provide a cohesive result. In my view, the design and appearance of the buildings, including their form and scale, are appropriate to the proposed uses and in general respond well to the site context. The offices, garage building and covered storage areas at heights of just over 9 metres, about 7 and 6.5 metres respectively are not in my view unacceptable in design terms. Some concerns have though been raised more particularly about the height of the salt barn at 14 metres, and its design. Indeed the Borough Council has asked for consideration to be given to re-designing the salt barn to follow a more traditional approach and to consider reducing it in height. However I am not convinced that a rectangular building with a pitched roof would have any advantage in visual terms and consider that the elliptical/spherical shape proposed with an appropriate colour roof covering would be less obtrusive in the landscape. In terms of reducing the height I have put this to the applicant and understand that the height is governed by the need for the tipper trucks to unload within the building.
35. A range of materials for the buildings is proposed as set in paragraphs (7) – (10) above and are largely considered to be acceptable. The way they are used to express the elevations, particularly on the office block with a balance of solid and void achieved with the glazed areas, adds interest and helps to reduce the scale of the building. However, I do share the Borough Council’s concerns about the colour of the proposed roofing and agree that a darker grey than that currently proposed would be preferable in terms of visual impact, particularly in the wider landscape. As is normal practise, it would be appropriate for the final choice of materials to be reserved by condition to maintain control and to ensure that current intentions of quality are achieved and that acceptable roof colours are chosen both for office, garage and covered storage areas and for the salt barn.
36. Overall, I consider that the design and appearance of the buildings is acceptable and would accord with the Development Plan policies in this respect. Despite the site being more extensively developed, I consider that the new buildings and the layout of the site would offer a considerable enhancement over the existing buildings and site as it currently is.

Appendix 1 to Item D5

Application for an integrated highways depot, London Road, Wrotham – TM/06/2342

Impact on Local Amenity

37. The proximity of residential properties to the site will be noted and has given rise to concerns being raised about the development by local residents, as summarised in paragraph (19) above. The properties closest to the site are to some extent separated by fencing and/or boundary planting although as acknowledged above there would be a degree of visual impact experienced as a result of the development, more particularly from the gardens and because of its height or from where there are gaps in the boundary. The nearest building to these properties would be the office building and this would be 11m and 14m from the neighbouring garden boundaries of Bellaville and Rosador, respectively. In terms of distances from the dwellings the office building would be about 36 metres from the nearest façade of Bellaville which is interrupted by boundary fencing and planting and about 42 metres from Rosador, corner to corner. The office building would be taller than these properties but, in my view, would be an acceptable distance away in terms of not, having an adverse impact on daylight and sunlight, resulting in any loss of privacy from overlooking, or the building appearing to be overbearing. As such I would not raise an objection to loss of residential amenity on these grounds.
38. It will however be noted that the Borough Council has asked the County Council to consider whether changes could be made to the design of the upper part of the south-west elevation of the office block, in the interests of protecting the privacy of neighbouring residential properties yet retaining an adequate internal environment to the office. I have put this to the applicant's Architect and I am awaiting a response, but it is the case that the building has been designed to ensure that there are not opportunities for direct overlooking any way. The first floor mezzanine floor is set back on the other side away from the glazing on the south east and south west elevations, as can be seen from the section AA on page D5.7. Although for the above reasons I do not consider that it is essential, I would not object to an appropriate change that improved the situation.
39. It is difficult to quantify and compare the proposal with previous activities at the site. There would obviously be traffic movements associated with the offices and the depot and a certain amount of onsite activity associated with the depot operations. One of the main concerns has been the perception that the depot would be operational 24 hours a day, 7 days a week and the noise associated with the continuous activity. In the light of these concerns the applicant's agent has indicated that this is not intended to be the case but rather that the depot element of the proposal must have the potential to operate continuously when necessary; and in practice such continuous operation or activity would mainly take place in the winter months during extreme weather conditions. Kent Highway Services has also provided information that the average number of runs from Swanley [which Wrotham will broadly replace] in the period 2001/02 to 2005/06 was about 60. In terms of runs outside normal working hours (defined for these purposes as 0700-1900), it has been advised that the vast majority take place in the evening (1930-2200) or early morning (0400-0700) with runs between 2200 and 0400 only undertaken when absolutely necessary.
40. A noise assessment was carried out on behalf of the applicants and our Environmental Consultant has advised on this as set out in paragraph (16) above. She is seeking some clarification and further assessment in particular of night-time activity. At the time of writing I have received the following response:

Appendix 1 to Item D5

Application for an integrated highways depot, London Road, Wrotham – TM/06/2342

“A 3m solid concrete wall would be constructed to the west of the site which would provide noise attenuation for Oakdene from noise emanating from the site. A two storey office block would be constructed to the southeast of the site which would provide protection to Bellaville and Rosador from noise emanating from the site. The entrance of the site would be bounded on either side by a 2.4m close boarded timber fence, providing additional protection, particularly from HGVs.

The vehicles, with predicted adverse weather anticipated would be loaded during the day. Only on rare occasions would the vehicles need to be loaded during the night and then the vehicles would be loaded internally within the salt barn. The skin of the barn would provide significant noise attenuation. The night-time use of the vehicles during adverse weather obviously depends upon the severity of the prevailing weather conditions and whether the vehicles need to return to the depot to reload; this would not be normal practice.

It must be stressed that this occurrence would be highly infrequent, and occur only during severe weather conditions when properties would have their double glazed windows closed, and be separated from the depot's activities by a 3m concrete wall, building structures and a 2.4m close boarded fence. It is considered that with the salt barn to the north of the depot, some 140 metres from the nearest property, the infrastructure of the depot would provide significant noise attenuation to the activities within the depot.

There is no mention of any other night time activities occurring on the site as they are not anticipated during the normal working week.

The design of the site is such that the vehicles movements within the site are directed clockwise and reversing manoeuvres are therefore kept to a minimum. Where such movements are necessary the vehicles would be moving away from the residential development. Use would be made of localised, directional alarms, which employ broadband white noise rather than a tonal signal, which is perceived as quieter and less disturbing and thus is less likely to cause annoyance, the reversing alarm being localized only in the danger area behind the vehicle, again the infrastructure of the depot would provide significant noise attenuation.”

I have re-consulted our Environmental Consultant and hope to be able to advise on the outcome at the Committee Meeting.

41. Concerns have been raised about pollution levels increasing in this locality arising from the concentration of the traffic generated by the proposed development. An air quality survey was carried out on behalf of the applicant. Our Environmental Consultant advises that having considered nitrogen dioxide and particulate matter with the proposal in operation, the slight impact caused by the increase in vehicles on the road network would not be measurable. She concludes therefore that there would be no detriment to amenity through air quality emissions from the site.
42. No details of external lighting have been submitted with the application and since this can have a significant impact on the local environment/landscape and be a cause of nuisance this should be reserved by condition if permission is granted.

Construction

43. Concerns have been raised about the impact of construction activity and the traffic generated. Clearly a site compound and temporary accommodation for contractors would be needed during the demolition and construction operations associated with the development. If planning permission is granted details particularly in respect of siting could be reserved by condition to ensure that it does not unduly impact on residential

Appendix 1 to Item D5

Application for an integrated highways depot, London Road, Wrotham – TM/06/2342

amenity. Similarly details of parking for contractors and subcontractors vehicles, to be provided on the site to avoid indiscriminate parking elsewhere that would compromise highway safety or inconvenience local residents, could also be reserved by condition if planning permission is granted. It is also normal to impose a condition requiring appropriate measures be taken to prevent mud and other debris being taken onto the highway.

44. In addition to the above, given the proximity of adjoining properties, if planning permission is granted it would, in my view, be appropriate in order to protect their amenities to impose a condition restricting hours of construction and demolition. I would suggest that this should be between the hours of 0800 and 1800 Monday to Friday and between the hours of 0900 and 1300 on Saturdays, with no operations on Sundays and Bank Holidays.

Drainage/Protection of Water Resources

45. Some local residents have concerns regarding water run-off from the proposed development. No details of drainage for the new buildings, access and parking areas have been provided at this stage, but they could be reserved by condition for later consideration, including consultation with the Environment Agency if permission is granted. In fact, the Environment Agency has requested a number of conditions be imposed in respect of foul and surface water drainage.

Salt Contamination

46. A number of concerns have also been raised about contamination from salt. The Environment Agency has provided a guidance note which covers this issue. Their preference is for salt storage to be covered as is proposed in this case, unlike the current practice at some of the existing depots. The drainage of the site would also be important to prevent contamination of the local water environment from salt, and as indicated above the Environment Agency would need to be satisfied with these proposals.
47. In response to concerns about windblown salt, the applicant's agent has commented as follows:

"I am advised by KCC Highways and Ringway that gritting salt consists of particles about 6mm in diameter. Although the salt barn is covered, salt is hygroscopic, that is, it absorbs moisture from the air. The method of loading the salt, either by shovel or hopper, is designed to avoid spillage. A new system (called "pre-wet") will I understand be introduced. These four factors, however – the size of the salt particles, the properties of salt, and the current and future operational methods should in my opinion ensure that the risk of wind blown salt affecting neighbouring properties would be minimal."

Ground Contamination

48. It will be noted that the Environment Agency has given advice about the potential contamination of the site from the previous uses. It is suggesting that in the first instance a desk top study is carried out prior to determination of the application to examine this issue, and imposition of a number of conditions to deal with the issue subsequently. At the time of writing I have been advised that a desk top study has been carried out and is being sent to me. Once received I will be seeking the further advice

Appendix 1 to Item D5

Application for an integrated highways depot, London Road, Wrotham – TM/06/2342

of the Environment Agency. If Members were minded to grant planning permission this issue should be addressed/resolved in consultation with the Environment Agency prior to any decision being issued.

Ecology

49. The applicant has indicated in the Design Statement that surveys of wildlife and habitats on the site have been carried out and that the reports would be responded to. I understand that an initial scoping survey for ecology was carried out. At the time of writing I have just received a report on herpetofauna surveys carried out. This considers the likely presence of Great Crested Newts in appropriate ponds within 500 metres of the site, the likely presence of reptiles on the site, assesses the conservation status of herpetofauna at the site, and advises on mitigation. An assessment of habitat variables has revealed that the ponds surveyed offer 'poor' and 'below average' potential for Great Crested Newts and that an application for a DEFRA Great Crested Newt Licence is not necessary. Survey work confirmed the presence of Common Frog and Smooth Newt from terrestrial habitat within the site boundary and the presence of a protected species, Viviparous Lizard, from within the site boundary. The report advises that mitigation for the Viviparous Lizard would be required if the development were likely to disturb occupied habitat. It further advises that proposals for mitigation should be prepared and agreed with the appropriate authority before commencement of construction activities. I am consulting English Nature on the report and seeking advice on whether details of proposed mitigation are needed before the application is determined or whether they are content for these to be required by condition. In the latter case, conditions could be imposed to require details of the necessary mitigation work to be submitted for prior approval and to ensure that it takes place prior to the commencement of any development. If Members were minded to grant planning permission this issue should be satisfactorily resolved prior to any decision being issued.

Archaeology

50. An archaeological assessment has not been submitted with the application. However it will be noted that the County Archaeologist has asked that a condition requiring a watching brief be imposed, if planning permission is granted.

Transport and Access Issues

51. The proposal would generate a fairly significant amount of traffic arising from both the office staff and from the depot element of the proposal. As a consequence, provision for parking 125 cars, 5 motor cycles, 15 cycles, and garaging for 28 vehicles is proposed as described above. A Transport Assessment accompanied the application together with a Travel Plan to aid consideration of the proposal. In terms of traffic movements the Transport Assessment indicates that a total of 182 vehicle trips would be generated in the AM (0800-0900) and PM (1700-1800) peak periods. The distribution of these trips is relatively evenly split between the office and maintenance uses of the development and similarly split between traffic heading north and south. The total trips correspond to a vehicle entering or leaving the site approximately every 20 seconds during the peak hours (0800-0900) and (1700-1800). However, the Assessment demonstrates that the proposed development would not have a material impact on the local highway network, and that the existing network would be able to accommodate the predicted number of trips calculated. It concludes that the increase

Appendix 1 to Item D5

Application for an integrated highways depot, London Road, Wrotham – TM/06/2342

in trips as a result of the proposed development would not have a detrimental impact on the A20 London Road, or the surrounding local highway network.

52. In addition to requirements to meet highway safety objectives, Development Plan Policies and Planning Policy Guidance, seek to promote sustainable transport. A Travel Plan has therefore been submitted with the application. Whilst acknowledging the constraints arising from, for example, Highway staff needing to travel to locations that are inaccessible to public transport and to carry out their service as efficiently as possible, the applicant is committed to minimising the overall transport impact of its essential operation proposed at Wrotham. The Travel Plan aims to reduce the need to travel as far as possible while recognising operational needs; ensuring the most sustainable transport mode consistent with an efficient and best value service is used for necessary trips; encourage sustainable commuting to the site and especially decreasing the proportion of single occupancy car commuter trips; and influencing travel patterns and managing parking at the site so that demand can be accommodated within the level of 78% of staff numbers assumed in the Transport Assessment. The Plan includes targets and initiatives with the objective of meeting these aims, includes a section on monitoring and review and timescales for implementing initiatives. It is acknowledged that the site is not ideally located for public transport and that car sharing is likely to be the most flexible, convenient and cost-effective means of reducing car trips.
53. The proposal has given rise to a number of objections on account of the traffic that would be generated, particularly at peak periods and the potential for traffic congestion and parking problems in this locality being exacerbated. The points made summarised in paragraph (16), (19) & (20) above will be noted. The Divisional Transport Manager's observations made on behalf of the Highway Authority set out in paragraph (16) above will also be noted. In conclusion, he is not raising a highway objection subject to the egress from the site being left turn only, the submission of these details and a stage two safety audit of the access/egress. In addition, if planning permission is granted he would wish to see conditions imposed to safeguard parking, access and circulation within the site, to require a Travel Plan to be produced and regularly reviewed, and to require a scheme of signing and lighting for approval.
54. It is acknowledged that the site is not well served by public transport and that there would be an increase in traffic generated. However, bearing in mind that the Area Transportation Manager has not raised a highway objection, I consider that these factors are outweighed by the need for the development to be well related to the Strategic Highway network and for it to be central to the area it would serve. Subject therefore to the technical requirements of the Area Transportation Manager being met and to the implementation and ongoing review of the Travel Plan, I do not consider that a refusal would be warranted on highway grounds in this particular case.

Conclusion

55. This proposal has given rise to a variety of issues including the impact of the proposed development on the openness of the Green Belt as discussed above. However, I consider that very special circumstances have been demonstrated in this particular case for overriding Green Belt policy constraints in terms of the need, the lack of alternative sites and the limited visual impact on this part of the Green Belt. On balance therefore subject to satisfactory resolution of the outstanding issues on noise, contamination and ecology, and the imposition of conditions, I am of the opinion that the proposed development would not give rise to any material harm and would otherwise be in

Appendix 1 to Item D5

Application for an integrated highways depot, London Road, Wrotham – TM/06/2342

accordance with the general thrust of the relevant Development Plan Policies. Therefore subject to any further views received by the Committee Meeting and to satisfactory resolution of the outstanding issues, I recommend that the application be referred to the Secretary of State for Communities and Local Government, and that subject to her decision, planning permission be granted subject to conditions.

Recommendation

56. SUBJECT TO any further views received by the Committee Meeting and satisfactory resolution of the outstanding issues on noise, contamination and ecology, I RECOMMEND that the application BE REFERRED to the Secretary of State for Communities and Local Government and subject to her decision, PLANNING PERMISSION BE GRANTED SUBJECT TO conditions, including conditions covering:

- the standard time,
- the development to be carried out in accordance with the permitted details,
- tree protection measures,
- landscaping and boundary treatment and subsequent maintenance,
- details of site and finished floor levels,
- external materials,
- external lighting,
- details of vehicular access - egress to be designed for left turn only, and a scheme of signing and lighting, for approval,
- provision and safeguarding of pedestrian access,
- provision and safeguarding of parking within the site and vehicular access routes within the site,
- implementation and ongoing review of the Travel Plan,
- details of foul and surface water drainage,
- ground contamination from previous uses,
- location of and construction of contractors site compound and provision of vehicle parking,
- measures to prevent mud and debris being taken onto the public highway,
- hours of working during construction and demolition,
- ecological surveys and mitigation, and
- an archaeological watching brief.

Paul Hopkins	01622 221051
--------------	--------------

Background documents - See section heading
--