

Statement from Westerham Town Council for Planning Committee Meeting of Tandridge District Council, Thursday 8th March 2019

Application 2018/1792

Westerham Town Council wishes to place on record its objections, not only to this application, but also to the conclusions reached in the Officer's Report.

Its objections, lodged to the 2015 and 2017 applications still stand. These were on the grounds of inappropriate development in the Green Belt with insufficient very special circumstances, of failure to conserve and enhance the Area of Outstanding Natural Beauty and of traffic and environmental impacts on the surrounding areas, especially those to the east of the proposed development. These were the precise grounds on which the 2015 application was refused.

Westerham Town Council fails to see how the detailed 2018 application together with the 'additional information' provide sufficient evidence for the original decision to refuse to be overturned.

Green Belt: WTC argues that in seeking to change the status of this site, removing it from the Surrey Hills AONB and Green Belt, the District Council has failed to address NPPF policies in that any decision must be informed by discussions with neighbouring authorities, of which there have been none. Also that through the District Local Plan they should fully examine all other options before considering changes to the Green Belt. Although TDC have sought to achieve this change in their emerging plan this has yet to be examined and the current plan must, therefore, be the overriding policy guidelines.

Assessing this site as 'previously developed land' ignores the pre-existing obligation to restore the land to 'a suitable use such as agriculture or forestry' set out in planning consents TA/87/532 and TA/91/373. The site must therefore be considered as Green Belt and not as previously developed land. Previous planning consents reflect this in that buildings constructed after 1948 carry a condition that they must be removed on cessation of tile manufacturing (TA/2007/226 as example)

There are 20 existing structures on the site at present of varying size and bulk, but all of modest form. Replacing them all with a single huge warehouse and lighting poles of 12 metres must have a negative impact on the landscape, notwithstanding any landscaping that can mitigate it. In addition the site will operate on a 24 hour schedule with round the clock traffic and lighting to accommodate this. Again it must have a negative impact on the surrounding environment.

Area of Outstanding Natural Beauty: NPPF sets out the duty is to ‘conserve and enhance’ these nationally important areas, which have the highest level of protection. The recommendation in the Officer’s Report is in contradiction of TDC’s Core Strategy Policies CSP 20 and 21 as well as to NPPF para 172, but also to Policies LU1, LU2 and LU3 of the Surrey Hills AONB Management Plan 2014-2019, which has been formally adopted by the constituent planning authorities, including Tandridge. It also contradicts the previous decision to refuse on the grounds of the urbanising effect of the buildings and intensification of activity, neither of which are changed in the current application.

Both Surrey Hills AONB and Sevenoaks District Council, registered their objection to the development on the above two grounds, as have a great number of local residents. TDC should be advised that should this application be granted, the procedure followed in reaching such a decision could be challenged and go to Judicial Review.

Traffic: Neither County Highway Authority has raised objections to the current application. However the basis of the traffic projections is unchallenged figures supplied by the developer of the number of parcels delivered into the proposed area on a February day in 2017. As the figure provided seemed unduly high compared with other DPD depots data from other dates were requested. This request has been consistently refused. The current situation is therefore that the traffic forecasts are based entirely on unchallenged figures provided by the applicant.

[It is also clear from the objections to this proposal from local organisations, representative bodies, MPs and residents from both sides of the county border that they do not share the Highways Authorities views, nor do they agree that current modelling applications used do reflect the reality of traffic along the A25 to the A 21 – the route to be taken by 77% of the LGVs from this development.]

Westerham Town Council is advised that should this application be granted, there are grounds for Judicial Review of the decision, advice it would follow up.