

## **Westerham Town Partnership Response to Moorhouse Tile Works – Planning Application No. 2015/1217**

The Westerham Town Partnership (WTP) is a Community Interest Company with the remit:

- To provide a forum for those interested in promoting the Town & Parish of Westerham with the aim of encouraging collaboration, partnership and working together.
- To promote the Town & Parish as a good place to live, visit and work thereby improving the economic and social well being of the Town & Parish.
- To support conserving and enhancing the character, culture, heritage and environment of the Town & Parish in its entirety.
- To disseminate information about the Town & Parish and its events.
- To support existing and new projects, presented by groups or individuals, for the enrichment of the community.

The WTP objects strongly to any proposal to develop the Moorhouse site that increases traffic flow through Westerham Town Centre. We argue that the current proposal (2015/1217) to build a distribution centre, with outline permission for a further 3 development units will increase traffic flow disastrously in an area where it is already critical. Discussion of any such development is unrealistic without direct access on to the M25 or a Westerham by-pass and neither of these is on the agenda.

The WTP jointly conducted a public meeting on 13<sup>th</sup> October 2015, attended by 250 people, with the Westerham Town Council, the Westerham Society and the Residents' Association, to discuss the above application, canvass opinion and gather evidence.

The proposed distribution centre is located in the Green Belt and an AONB where there is a presumption against development. The application for this particular site is only technically possible because of historic rulings, which relate to the Redlands tile works. It is our belief that a new application on an adjacent site would never be considered at all.

The WTP has authored a document entitled **'The Impact of Traffic & HGVs on Westerham'** (attached Appendix 1) which evidences the planning objections referred to below. This document illustrates

why Westerham cannot accept the proposed increase in delivery van and HGV traffic. It includes details of why the setting of Westerham is sensitive to the proximity of the A25. Westerham's heart receives traffic from six roads, but its road widths, three pinch-points, steep, sharp bends and narrow pavements and existing AQMA status makes it already unsuitable for its existing traffic.

### **1. Developers' traffic predictions.**

It is shown in **Appendix 2** that analysis of the facts, with 'reasonable use' assumptions, produces much higher traffic flows compared to the developers' predictions. There are also 13 loading bays included in the application: it is industry practice to use these as HGV parking bays: this potential is not catered for in the developers' figures.

The developers' traffic predictions appear to be based on false assumptions. Their example comparison is drawn with DPD Bournemouth, the smallest site in the DPD network, and much smaller than the Moorhouse proposal. **See Appendix 2** for detailed analysis.

### **2. Existing Traffic Volume v. Predicted Traffic Volume.**

Even if the developers' predicted traffic were accepted, the figures are compared with Redland flows many years ago, and not with current volumes from the site. Although this may be technically correct in planning terms, it seems grossly inappropriate in the setting of the old market town of Westerham. We submit that total A25 traffic volume has increased dramatically in the years since Redland ceased to operate, so that the impact of new similar volume levels on the setting (**AONB, Core Strategy Policies**) is unreasonable in the context of the road infrastructure in Westerham.

### **3. Air Pollution (See Appendix 1 for detail and evidence)**

An SDC Air Quality Management Area (**AQMA**) covers Westerham High Street, Market Square, Vicarage Hill and London Road. Latest measurements (2014) show all areas near the Nitrogen Dioxide (NO<sub>2</sub>) Annual Objective of 40ug/m<sup>3</sup>, with Market Square (the centre) approaching 30% higher.

Highways England has announced that it is to install more air quality monitoring stations along Westerham's stretch of the motorway. The M25 in Kent was identified as having some of the highest levels of NO<sub>2</sub> and particulates in the country, exceeding EU limits.

A Legal Opinion 6-10-15 from Robert McCracken Q.C. for Clean Air London concludes...*'where a development would cause a breach of **(Air Quality Directive 2008/50/EC)** in the locality of such development planning authorities must refuse permission; where a development would either make significantly worse an existing breach or significantly delay the achievement of compliance with limit values it must be refused.'*

#### 4. Jobs for Westerham

The developers state the majority of the jobs generated will be for delivery/collection drivers. These will be about 50% agency or owner-drivers, (not necessarily local) with the remainder required to be ready qualified. There is a scarcity of these resources and skills in the Westerham district and therefore the WTP concludes the uplift for Westerham jobs is negligible.

In a recent Press Release (**Sevenoaks Chronicle November 2015**) the developer claimed twice the number of jobs would be created than the application predicts, which seems to illustrate uncertainty in interpretation of data.

Westerham would support the creation of on-site jobs, which don't generate significantly more traffic.

#### 5. Impact on the Setting of Westerham: Heritage and Economy (See Appendix 1 for detail and evidence)

- Listed Buildings: Westerham has 140 listed buildings across the parish, many of which are directly fronting the A25. All three pinch-points are directly adjacent to listed buildings on both sides and there is evidence of physical structural damage from passing vehicles. Quebec House, fronting the A25 at Quebec Square is Grade 1 listed.

- Economy: Increasing traffic would adversely impact the SDC Economic Development Strategy Policy. Westerham's economy depends on tourism and visitors to the centre, for the history, shopping and café culture. Plans with Chartwell and Valley Farm to promote the town centre as a destination are well advanced.

The September 2015 experience with fire/traffic lights at the Manor House pinch point has demonstrated how vulnerable the town's retailers are to traffic congestion. We welcome local traffic which uses the town as a destination, but the relentless increase in through-traffic serves to discourage this. Because the A25 cuts through the centre and abuts the Green and with many narrow pavements, the whole setting of Westerham is damaged by heavy traffic. Visitors want to relax on The Green near the Churchill and General Wolfe statues, however, traffic relentlessly speeding through the town a few feet away discourages this. There is recent evidence from retailers that shoppers are beginning to avoid Westerham because of the congestion.

## 6. AONB

Being on the Surrey border, the historic town of Westerham is the gateway to Kent. Its walks take you through countryside which is the source of the River Darent and lead to villages in a corridor along the A25 which are some of the most precious parts of the SE countryside.

Westerham is in the heart of Kent Downs AONB. Its **Management Plan Policies** are a material consideration in planning matters. They direct '*...the finding of ways of achieving thriving, vibrant communities and a sustainable and prosperous local economy that conserves and enhances this nationally important area...*'

The vision described in the Kent Downs AONB (**Management Plan 2014-2019**) is that '*...change should reinforce and enhance the characteristic, qualities and distinctiveness of the Kent Downs and its communities...*' **See Management Plan 2014 - 2019 Policies MPP, SD, LLC, WT and HCH.**

Our predicted number of extra HGVs (many at night time) and delivery vans emerging from (and converging on) a site in such close proximity to the town's centre, would directly adversely impact these AONB Policies.

**Sources:**

Westerham's Conservation Area Appraisal and Management Plan 2014

National Planning Policy Framework

SDC Core Strategy 2011

SDC Economic Development & Strategy 2014

Kent Downs AONB 2014-2019

**Appendix 1:** The Impact of Traffic & HGVs on Westerham – Westerham Town Partnership October 2015

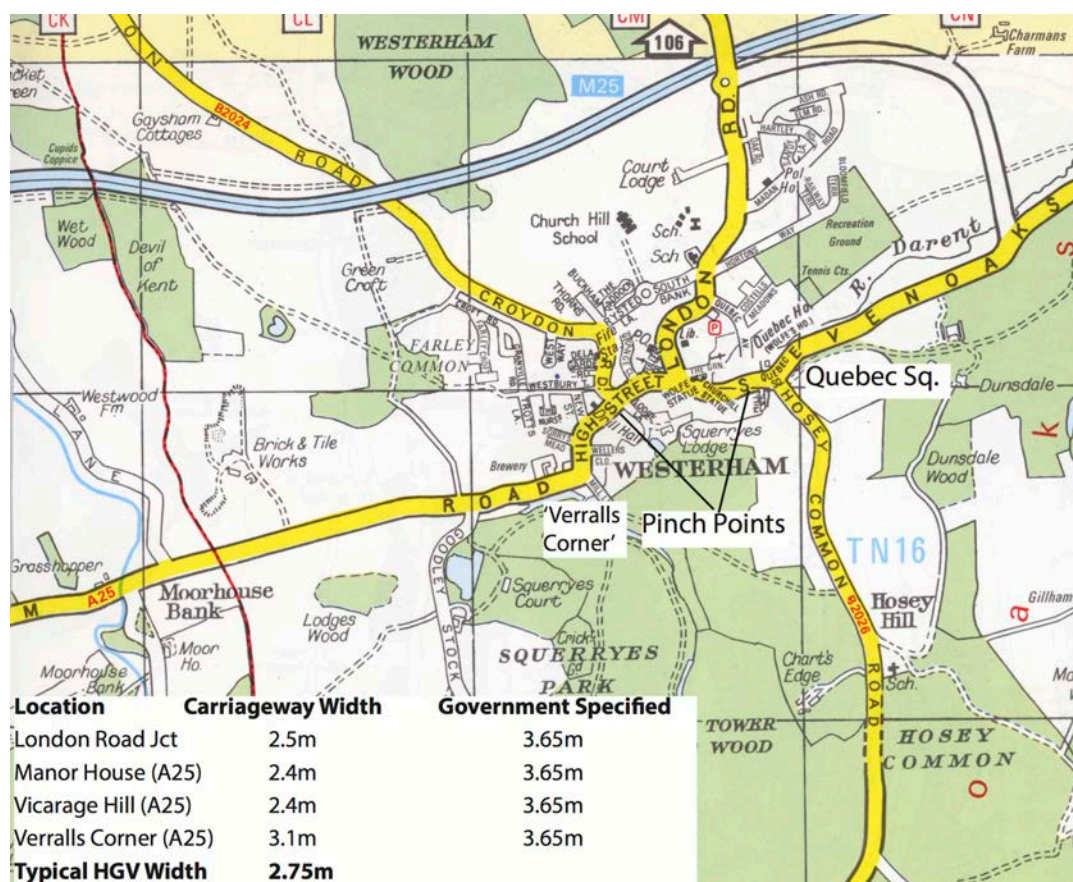
**Appendix 2:** Analysis of Roxhill Transport Report (Cashmore - Westerham Residents Association October 2015)

**Appendix 1**  
**Impact of Traffic and HGVs on Westerham**  
**November 2015**



## Impact of Traffic and HGVs on Westerham

Westerham is the gateway to Kent and one of the jewels in its crown. It is an ancient market town and the road widths were designed for horse and cart. The A25 through Westerham has two sharp bends and two pinch points where the road narrows to 4.8 metres compared to government specification of 7.3 metres for this class of road. Vehicles frequently have to mount the kerb in order to pass. Inadequate pavements cause an intolerable situation for pedestrians, cyclists and the disabled.



**The arterial road through Westerham (A25)** has pinch points that do not meet the Secretary of State's defined criteria of a :

'Classified Road' (3.65m carriageway width)

'Local Distributor', 'Collector', 'Residential Street **with bus route**' (ALL 3.375m).

*It does not, in fact, even meet the requirement for the lowest category - a*

*'Residential Street **non-bus route**' (2.75m)*

(source - Newcastle C.C. government website)

**Sevenoaks District Council Core Strategy 2011** identifies 4 priority objectives

- Improving accessibility
- Tackling congestion

- Providing safer roads
- Improving air quality

SDC has determined to bring forward measures to alleviate congestion and tackle air quality issues in Westerham.

### **A25 Pinch Points**

#### **1. Manor House/Lodge Lane crossroads - width of road 4.8 metres**

The road narrows to a severe pinch-point with Grade II listed shops with narrow pavement on the south side and the wall of the Grade II\* listed Manor House which abuts the road on the north side. The carriageways at this point are 2.4 metres from centre line to kerb-edge. It is impossible for any other vehicle to pass an HGV or other wide vehicle at this point





**2. Yew Tree Cottage/Monks Way** on Vicarage Hill - width of road 4.8 metres

The road suffers a severe pinch-point here due to the proximity of 'Yew Tree Cottage' and 'Monks Way' opposite (both Grade II listed). The pavement on the north side is so narrow as to be virtually unusable. The carriageways at this point are 2.4 metres from centre line to kerb-edge. It is impossible for any other vehicle to pass an HGV or other wide vehicle at this point



All taken by Yew Tree Cottage/Monks Way on Vicarage Hill, A25

### **Pedestrian Safety on pavements**

When walking around the town there are several places where the pavement disappears on one side of the road and pedestrians are required to 'brave the traffic' as they have no option but to cross to the other side. This is particularly significant for the elderly and disabled, especially if they are visitors and unfamiliar with the town. This applies to both pinch-points and at the top of London Road.

Vicarage Hill residents Malcolm Basing and Irene Pearce have both reported dangerous incidents to KCC in the past. Mr Basing was forced to press himself against the wall to avoid being hit by a white van coming up the hill which mounted the pavement at speed to avoid colliding with an oncoming lorry. The driver said he did not realise the road was so narrow. Kent County Council said there was nothing they could do to the layout of the junction not least because it was bracketed on both sides by listed buildings. In a similar incident Ms. Pearce was actually hit by a passing vehicle. (see photo below with white van mounting pavement against her house)



## A25 Sharp Bends and Difficult Junctions

### 1. Verralls Corner

A notorious bend approaching ninety-degrees, and the scene of some nasty accidents over the years, most recently an HGV skidding on the wet road and colliding with the corner of this terrace of cottages.



HGVs negotiate the bend at Verralls Corner  
Note Iron Girders defending house



## 2. Quebec Square

A difficult junction of two busy roads with a blind turning eastwards from the B2026 onto the A25. The B2026 is the road to 'Chartwell' which welcomes 230,000 visitors per year.



B2026

As can be seen the blind turning from the B2026 onto the A25 is a ninety degree junction with severely limited visibility.

The A25 approach to this junction from the east suffers an adverse camber, the scene of many accidents in wet weather where vehicles have hit properties surrounding the junction. In 2012 a large heavy wooden planting-trough was built on the pavement at the junction to protect the old cottages on the south side opposite Quebec House (Grade I listed National Trust property).



Local resident Ray Camlin inspects the damage outside his property.  
Photo courtesy Sevenoaks Chronicle.



The wooden planter placed in front of Quebec Cottages for protection

### 3. Junction the Green and Vicarage Hill (Yew Tree Cottage)

There is virtually no pavement by Yew Tree Cottage and vehicles pass very close to this old listed building. In late October 2015 a Supermarket delivery van collided with the building while passing another vehicle at this pinch-point in the road, causing damage to the porch-level roof, guttering and tile-hung wall.



See close-up insert for detail of roof damage



#### 4. London Road junction

The London Rd junction (A233 to Bromley) with the A25 arguably suffers the worst traffic pollution in Westerham, being a T-junction on a hill between high-sided buildings. The road width is 2.5m per carriageway - well below the specified 3.65m per carriageway. There is no pavement on the west side of the A233 where a Grade II listed building abuts the carriageway at the corner with the A25. The east-side has a narrow pavement fronted by another Grade II listed property.



A lorry crosses the white-line to turn into the London Road



The bus from Bromley moves out and crosses the white line to clear the pavement on its turn eastwards to join the A25

## 5. Croydon Road Junction

The Croydon Road Junction (B2024) normally gives good visibility in both directions, until an HGV is turning when visibility is significantly reduced. This is a ninety-degree junction both east and west and HGVs block both carriageways when turning from the B2024 as the junction is just too tight.



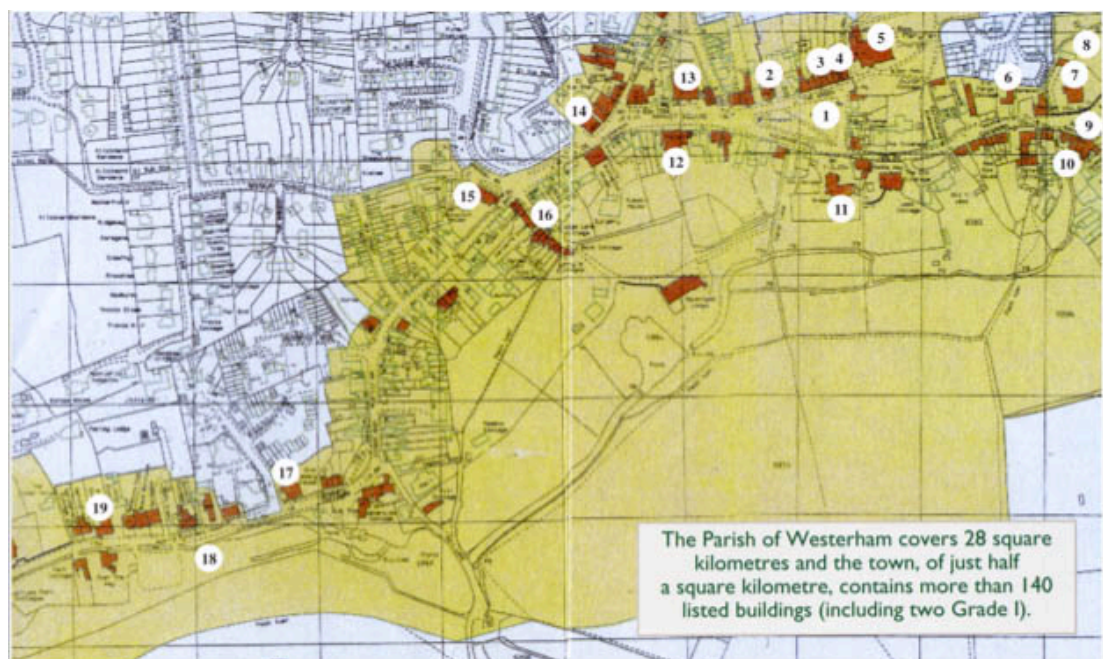
It should be noted that both the Croydon and London Roads are used by existing HGV traffic travelling to and from south London, Croydon and Bromley. These vehicles have difficulty accessing the A25 through Westerham, using either the A233 or B2024 as shown in the photo above.

## Listed Buildings

There are over 140 listed buildings in the parish of Westerham, many of which have little or no foundations. Existing traffic is already having an adverse impact on the setting of our listed buildings

The setting of our buildings is *'influenced by environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each'*.

source - the National Planning Policy Framework



Westerham's Conservation Area Appraisal and Management Plan 2014 describes the town's character and areas of special interest:

New development should look for *'...opportunities to enhance the setting of the conservation area'* and should not *'...harm its significance'*

## Air Quality

All the pinch-points and junctions so far mentioned are boxed-in by tall buildings, but to date no measurements have been made at the pinch points. Emissions to the atmosphere of the exhaust from existing traffic along the A25 have already led to the centre of Westerham being declared an Air Quality Management Area (AQMA) for the pollutant Nitrogen Dioxide. Measurements have indicated that the concentration of this pollutant in Westerham have exceeded the criteria set out in the National Air Quality Strategy. The 2014 measurement in Market Square exceeds objective levels by as much as 25%: the

Direct Action (point 9) of the Air Quality Action Plan requires ***recommendations for suitable traffic-reducing proposals in the centre of Westerham*** to be made to Sevenoaks Joint Transport Board.

Nitrogen Dioxide is formed by chemical reaction in the atmosphere from Nitric Oxide which is produced during the combustion process in a vehicle engine and is emitted in the exhaust.

There is clear evidence that Nitrogen Dioxide is harmful to health. The most common outcomes are respiratory symptoms such as shortness of breath and coughing. Nitrogen Dioxide inflames the lining of the lung and reduces immunity to lung infections such as bronchitis. Studies also suggest that the health effects are more pronounced in people with asthma compared to healthy individuals.

The Committee of Medical Effects of Air Pollutants (COMEAP) is to publish detailed research in December 2015, adding to this evidence and the Government is required by the Supreme Court of Justice to produce a plan of action.

The Environment Audit Committee heard evidence on Diesel emissions and air quality on October 27 2015. The subject of M.O.T. Testing for Diesel Emissions was discussed and a comparison against the cost to the N.H.S. of health harm from diesel emissions and indeed the 50,000 deaths p.a. directly attributed across Britain was requested. Deliberate illegal activity from a car manufacturer gave rise to the question of 'Corporate Manslaughter'.

Clean Air in London (CAL) published (October 2015) an Opinion from Robert McCracken Q.C. which concluded ...***'where a development would cause a breach (of the Air Quality Directive 2008/50/EC) in the locality of such development planning authorities must refuse permission; where a development would either make significantly worse an existing breach or significantly delay the achievement of compliance with limit values it must be refused...'***

It is evident that the extra traffic resulting from the proposed development would increase the concentration of nitrogen dioxide as well as of other pollutants not only because of the increased number of vehicle movements but also because of the inevitability of more frequent traffic jams. Sevenoaks District Council would be unable to fulfil its existing legal obligation to take action to reduce Nitrogen Dioxide concentrations in Westerham.

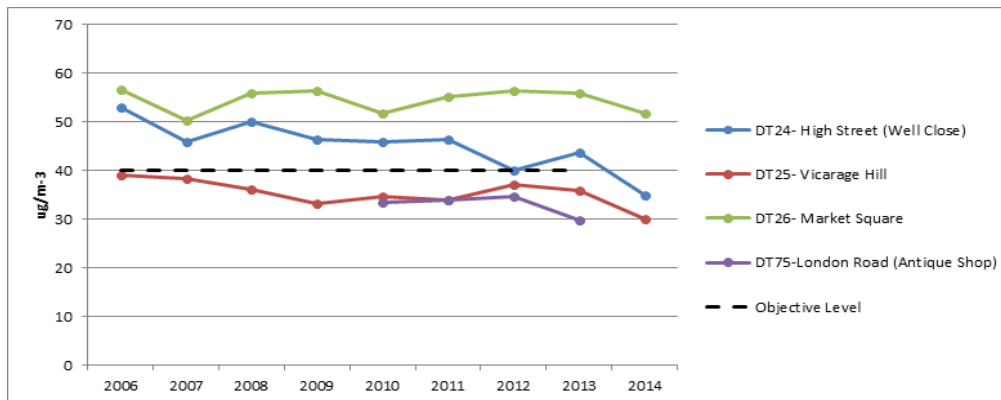
An analysis of the presence of local schoolchildren, standing on the roadside during peak traffic times, waiting for buses, exposed in Westerham's AQMA, during the period July 2013 to July 2015, has been produced, and will continue to be updated.



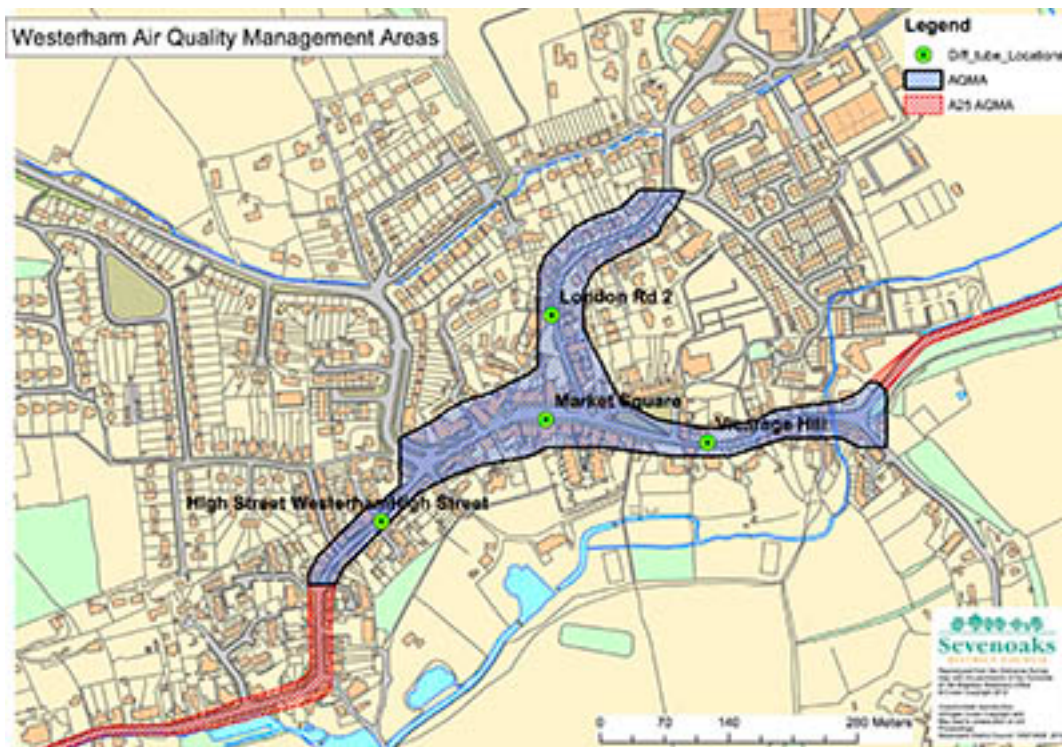
## Nitrogen Dioxide annual objective

Site Number	Site Location	All results in ug/m-3		NO2 annual objective 40ug/m-3							
		2006	2007	2008	2009	2010	2011	2012	2013	2014	
24	DT24- High Street (Well Close)	52.9	45.9	50	46.5	46	46.5	40.1	43.8	35	
25	DT25- Vicarage Hill	39.1	38.3	36.1	33.2	34.8	33.9	37.1	35.8	30.1	
36	DT26- Market Square	56.7	50.2	55.8	56.5	51.8	55.2	56.5	55.8	51.7	
75	DT75-London Road (Antique Shop)					33.5	34	34.6	29.7		
	Objective Level	40	40	40	40	40	40	40	40		

## Pollution levels at nominated positions in Westerham



## Air Quality Management Areas (AQMA) in Westerham





### **Pollution Damage to Listed Buildings**

Brickwork and ragstone base-work on several old properties shows significant deterioration and erosion caused by sulphur-laden pollutants splashed on the brickwork by close-passing traffic in wet weather.



Yew Tree Cottage, Vicarage Hill, A25

### **Sustaining the town in an Area of Outstanding Natural Beauty**

Westerham is in the heart of an AONB and hosts two significant SSSI. The projected increase in HGV and other regular traffic would be severely damaging to our environment in the impact on houses, the community and the wider Kent AONB. The National Planning Policy Framework directs that development should be restricted in an area of AONB with the presumption of sustainable development being a 'golden-thread' running through decision taking. In short, increased traffic flow would undermine the sustainability of Westerham's character, community and infrastructure.



## Economic Development, Café culture and the Green road frontage

The economy of the town is highly dependent on the **Café culture** which is actively marketed by the Town Partnership as a tourist attraction. The A25 is fronted by the town's famous 'Green' and the statues of General Wolfe (1911) and Winston Churchill (1969). The earliest photo-postcards promoting this spot as 'somewhere to visit' date from 1853.

There is a link between traffic and levels of social interaction on the street. A study from University West of England concluded *'higher levels of motor vehicle traffic were found to have a considerable negative impact on the social and physical environment...'* and *'...it was significant that residents identified numerous impacts on the practical quality of life within the medium and higher level traffic streets'*

source - [uwe.ac.uk/15513/1/WTPP](http://uwe.ac.uk/15513/1/WTPP) Jan 2001

The town's economic and development strategy has been planned in conjunction with the National Trust at Chartwell and the projected Westerham Valley Farm development. Westerham town centre will be promoted as a destination accompanied by a walking heritage trail supported by smart-phone technology. Increased A25 traffic flow will have a devastating effect on Westerham's future economy





The A25 runs alongside the Green from London Road A233 junction to the pinch-point at Yew Tree Cottage, top of Vicarage Hill. Community events held here are often spoilt by the proximity of heavy traffic on this busy road

### **Fragility of Westerham's road system**

Local side-roads were constructed in the era of the horse and cart and are all very narrow. Very few houses in these side-roads have off-street parking or a garage yet home owners today invariably have two or more cars per household.

The M25 between junctions 5 and 6 which are directly north and either-side of the town is considered to be one of the UK motorway system's worst accident 'black-spot' areas. Any diversions necessary are routed via the A25 through Westerham town centre. Any incident at all leads to chaos in the town. To quote the Westerham Village Design Statement, 2001 - *'a hiccup on the motorway equals a thrombosis in the town'*.

On September 21 2015, a fire in an old property near the pinch-point at the Croydon Road junction resulted in road-closure for five days. Drivers of HGVs persisted in attempting to use back-roads to the alarm of local residents







After the fire was extinguished, the roof was deemed unsafe and the building in danger of collapse. Scaffolding erected to support the building was deemed so close to the road it could be hit by passing vehicles. Vehicles regularly mount the pavement at this point in order to pass. After five days the road was reopened for one-way traffic with temporary traffic lights until the building can be repaired (unknown timescale).



## Appendix 2 - Analysis of Roxhill Transport Report (Cashmore - Westerham Residents Association October 2015) (see below)

### Moorhouse Site Areas

Geopost and B8 Proposal 2015			Parking spaces for	
		Sq Metres	HGV's	Cars/Vans
<b>Proposed Units</b>	Unit 1 Geopost	5595	19	104/151
	Unit 2	4623	23	44/66
	Unit 3	6466	32	64/92
	Unit 4	4274	21	43/61
	<b>Total</b>	<b>20958</b>		

### Roxhill Planning application

- Transport Assessment section 1 - clause 4.7 within the planning application.
- Clause 4.7 states there will be 100 delivery vehicle in and 100 out from the site daily, with the majority leaving between 7am and 9.30am.



**Table 5 – Trip Generation for Geopost**

Time Range	Vehicular Trips		
	Arrivals	Departure	Totals
Light vehicles			
08:00-09:00	24	19	43
17:00-18:00	17	20	37
Daily Trip Rates	247	247	494
Heavy vehicles			
08:00-09:00	1	1	2
17:00-18:00	0	0	0
Daily Trip Rates	13	13	26
All vehicles			
08:00-09:00	25	20	45
17:00-18:00	17	20	37
Daily Trip Rates	260	260	520

## Early morning traffic movement

	Geopost figures	Our estimated	Warehouse staff	Total Geopost	If using all 151 vans	If whole B8 site used for distribution
	departures	delivery vans only	departures	departures	51% increase	increase by 3.75 times
06.00-07.00		4		4	6	23
07.00-08.00		23		23	35	130
08.00-09.00	19	50	24	74	112	419
09.00-10.00		23	8	31	47	176
Total		100	32	132	199	747

		Total Daily Vehicle movements from site		
Transport report conclusions		All	HGV's	Cars/Vans
Consultants Suggestion 2015/2020	full site 20958 sq m	394	126	268
Geopost site would generate	5595 sq m	520	26	494
		Majority HGV movements overnight		
Our Conclusions				
If full Geopost site using 151 vans then increase above by 51%	5595 sq m	785	40	745
Rest of B8 site (using table 4)	15363 sq m	1431	118	1313
Total Traffic (generated by full site)	20958 sq m	2216	158	2058

All extra lorry movements at night and early morning  
21 lorries per hour over 7 hours period

Summary		Daily Movements		
		All	HGV's	Cars/Vans
Total Traffic (generated by full site)	20958 sq m	2216	158	2058
Government census figures	5 year average	9286	34 (Roxhill survey)	
Increase in traffic potentially		24%	465%	
	2216/9286 All traffic change			
	158/34 HGV change			

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