Planning Comment submission
on application 2018/1792/1 at 18/02/2019 15:52:53

Thank you for your comments on application 2018/1792/1, which have been received.

Please note that we do not send a separate acknowledgement.

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<tr>
<th>Commentator/Name</th>
<th>Eric Fosdike</th>
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<td>Telephone No</td>
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<tr>
<td>Email Address</td>
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<tr>
<td>Address</td>
<td>12 Westerham Road, Limpsfield, Oxted, RH6 0ER</td>
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<td>Planning App No</td>
<td>2018/1792/1</td>
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<td>Comment Reason</td>
<td>Object to this application</td>
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| Comment          | Environmental threat to AONB/Green Belt

- On moral grounds alone this development should be refused for the damage it will cause to the environment at a time when the detrimental effects of air pollution from traffic are well known, particularly for children. And let us not kid ourselves that electric vehicles are the answer. It will be a decade or more before we see electric HGVs.

  - The 560 sq.m depot is significantly out of scale and is being placed within a Green Belt/Area of Outstanding Natural Beauty. The size and scale of the building alone contradicts TDC’s need to offer such areas the highest level of landscape protection, and is materially larger than anything else comparable in the area. Along with the constant movement on the site around the clock, and 12m high lighting it will be impossible to screen the intrusion of the site both visually and audibly. This development does not meet the requirements of VSC in national planning policy.

- The application conflicts with TDC’s core strategy and the national planning policy:
  1. CSP20 to conserve and enhance the special landscape character of the locality. CSP21 that the districts landscape and countryside should be protected.
  2. The Surrey Hills Management Plan which TDC has signed up to, offering protection to the area under policies L11, L12 and L13.

- Finally on a national level set by HMU under the NPPF para 172 offering the highest level of protection to preserving and enhancing landscape and scenic beauty.

- Much of the housing stock in Oxted and Westerham will be sandwiched between pollution from the M25 and the damaging effects of increased pollution from HGV’s on the local road network.

- The number of listed buildings in the area will be subjected to the materially increased traffic will risk their structural integrity and longevity. In the Tandridge, Surrey area, 598 buildings are Grade I or II listed, of which 188 are on or just off the A25 as one travels west from the proposed Moorhouse facility. Similarly, to the East of the proposed facility there are 1650 buildings in the Sevenoaks, Kent district that are Grade I or II listed, of which 108 are on or just off the A25 as one travels east from the proposed Moorhouse facility (source - www.historicengland.org.uk). These buildings are already subjected to high levels of traffic (particularly during rush hour), and the proposed Moorhouse facility will increase the noise and air pollution which will further contribute to the demise of these treasured buildings.

- Traffic threats and fazed analysis

- Highly questionable rejections made by KCCH and SCCH, originally objecting the application and now accepting, when no changes have been made to proposal’s traffic generation projections or the current road technical capacities – especially in light of the impact on the minor roads off the A25 when the M25 is frequently disrupted.

- The significant negative impact it will have on the traffic levels in the immediate area, both along the A25 as well as those arteries which feed off the A25. Given it will also be a 24/7 operation, it most certainly will disturb the surrounding areas continuously. There are already approximately 14,300 motor vehicles movements daily on the western stretch of the A25 in Oxted, and 10,100 motor vehicle movements daily on the eastern stretch into Westerham (source - www.dft.gov.uk, 2017 road traffic stats). This means if the proposed Moorhouse facility adds the anticipated 1,300 additional daily movements it will increase overall movements by 10-15% above what levels are currently (depending on which way the DPV trucks are heading), adding materially to an already heavily used road. Keep in mind that there is no oversight of just how many vehicles movements could occur, which means the 1500 is a conservative estimate.

- Unsuitable location

- It is poorly located for its intended purpose. Distribution hubs should be located adjacent to and with direct connection to major motorway networks. This mitigates the harmful effects of heavy traffic and is the blueprint for such developments up and down the country.

- Its poor immediate access to the M25, which will require the use of the surrounding A25 road and arteries to reach the M25 in order to both receive and distribute the packages from this depot, which are estimated to be conserved (before, growth or seasonal peaks).

- The additional heavy traffic will cause environmental damage to the people and wellbeing of the community with schools and residential areas badly affected by the additional pollution.

- Not only is this development in the wrong location but it will also create a precedent for further development of distribution units on the site.

- Lack of control/escalation

- This development will also create a precedent for further development of distribution units on the site, where TDC will have extremely limited control in the growth of such a heavy industrial site.

- The description of the application refers to “unit 1” – surely this is indicative of the developer and client’s intentions to grow the site further, and revert to the multiple unit proposed in the 2015 and 2016 applications.

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