

**The Westerham Society**  
c/o 2 Yew Tree Mews, Market Square  
Westerham, Kent, TN16 1BF

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**Moorhouse Tile Works Planning Application – Objection**  
**Application 2015/1217**

Please note The Westerham Society represents over 400 residents of Westerham and the region. The Westerham Society is a recognised historic and heritage group founded some 90 years ago.

Please note our following very strong objections to this proposal under the following four categories:

**1) Traffic:**

Both the figures provided in the application, and the figures counter submitted by various other parties objecting to the proposal, show very high increases in traffic volumes on the A25. The stretch of the A25 through Westerham is already seriously congested and is severely impacted by any problems on the corresponding section of the M25. The A25 in Westerham has two significant road width restrictions (pinch points) which have resulted in traffic accidents, pedestrian risk and building damage. Additional traffic will only make this worse and especially if such traffic is HGV's or large vans. We have to accept that traffic on this road is already forecast to increase even without the negative results of this application.

We would ask you to consider the following:

1. The traffic projections should be based upon full utilisation of the parking/unloading spaces in unit 1. Initial over provision is not without a purpose, that purpose must be future growth. On this basis the traffic consultant's estimate of delivery vans for unit 1 joining the A25 between 08.00 and 09.00 increases from 19 to 112. Allowing for the full utilisation of vehicles in unit 1 creates a daily overall 8% increase in traffic onto the A25 and 12% using the Roxhill traffic survey of 943 movements between 08.00 and 09.00. Traffic from the rest of the B8 site for the three remaining units using the consultants TRIC data warrants a further 3% increase but similar distribution use by the other 3 units results in a peak hour increase of 44%.

The resultant traffic increase from unit 1 is therefore severe in the context of NPPF paragraph 32 when focusing these volumes into either daily or peak time occurrences and massively so should 4 parcel distribution be built.

2. DPD, the proposed tenant, now operate the new "ParcelLock" system. This offers other distribution companies and supermarkets the ability to store and distribute

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goods at DPD sites using own transport. The transport analysis takes no account of such extra traffic.

3. The size of the Moorhouse unit indicates its future will be as a transport hub location or “supersite” rather than a depot. This increases its HGV movement profile as it will both receive and make bulk parcel deliveries. The consultant’s figures are based upon depot status.
4. In the application, overnight HGV traffic is offered as a benefit. There is a Government 5 year statistical average of 9,286 traffic movements per day through Westerham. Nighttime provides respite, particularly from HGVs. This respite diminishes under the DPD proposals, as the percentage nighttime growth in HGV traffic is substantial.

Further, we understand that there is a statutory requirement, under section 5.4 of the Local plan- “Surrey CC should provide technical advice and comments on planning applications specifically involving highways safety which should be used to assist applicants prior to submitting an application”, and we see no evidence of this. Also we cannot see any consultation by Surrey with Kent Highways who are directly impacted by this development and whose comments should have been sought.

**Pollution:**

Westerham is already designated an Air Quality Management Area (AQMA) as nitrogen dioxide levels exceed the National Air Quality Standard. 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...". There can be no doubt that this application makes the situation 'significantly worse'

**Area of Outstanding Natural Beauty (AONB):**

There are 148 Listed buildings in Westerham, many on the A25. As mentioned they have already been damaged by traffic accidents at the two pinch points. However, the greater damage is caused by road water wastage. 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. Again increased traffic will impact this erosion at a faster and more effective rate.

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Being on the Surrey border, the historic town of Westerham is the gateway to Kent. Its walks take you through countryside that is the source of the River Darent and lead to villages in a corridor along the A25 that 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. The 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.

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

**Economy:**

We do not agree that any significant number of new jobs will be created for the benefit of Westerham residents. Rather we see the opposite where jobs could be lost due to the overall negative affect of this development on the existing local tourist and shopping sector. Westerham and the region is a major draw for UK and overseas visitors who enjoy the semi-rural nature of the town, the easy access to historic Kent and Surrey, and the quality of our historic buildings. As outlined above, this proposed development would have a negative impact on all these qualities thereby reducing visitor numbers and associated retail, eating and tourist jobs.

**In conclusion, for all the above reasons, The Westerham Society strongly objects to the current proposals.**

Yours Sincerely

Wm Gordon Rodgers  
Chairman