The countryside charity
Kent

12th May 2025

Application: 25/00599/PA- FORMER MARLEY SITE, London Road, Wrotham, Sevenoaks, TN15 7RW

Proposal: *Full planning application for demolition of the existing buildings and redevelopment of the Site to provide 2no. warehouse buildings (Units 1a - 1d for B8 Use and Units 2 and 3 for flexible B2 (general industrial) /B8 (storage and distribution) Use), with ancillary office space and associated access, servicing, parking and landscaping*

We are CPRE Kent, the countryside charity. Formed in 1926, CPRE is a registered charity and one of the longest established and most respected environmental groups in England. CPRE Kent is the largest of the CPRE County branches with over 1,100 members, including over 160 parish councils, civic societies and other Kent organisations and companies.

Our vision is of a beautiful and thriving countryside that enriches all our lives, and our mission is to promote, enhance and protect that countryside

Having reviewed this application and **object** to the proposal on the following grounds:

- Impact on Kent Downs National Landscape.
- Light pollution.
- Failure to demonstrate "Very Special Circumstances" for development within the Green Belt
- Ecological Impact.
- Residential Amenity impact.
- Unsustainable location.

Our detailed comments are as follows:

1) **Impact on Kent Downs National Landscape.**

The site is located adjacent to, and therefore within the setting of, the Kent Downs National Landscape, a designation that confers the highest level of protection upon our precious countryside. National Landscapes are irreplaceable assets requiring the strictest levels of conservation. Any development within or affecting these landscapes must actively enhance, rather than diminish, their distinctive scenic beauty, tranquillity, and character. Locally, CPRE Kent echoes this position and explicitly supports the principles outlined in the Kent Downs National Landscape Management Plan (2021–2026), particularly Principles SD7 and SD8. Principle SD7 stresses the conservation and enhancement of tranquillity and dark night skies, while Principle SD8 specifically requires developments not to negatively impact landscape character, distinctive landform, and views into or out of the National Landscape.

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The Kent Branch of the Campaign to Protect Rural England
exists to protect the beauty, tranquillity and diversity of the Kent countryside.
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Protected landscapes are finite and vitally important to both current and future generations, and any proposal within these areas should be subject to the most rigorous scrutiny. In this instance, the applicant's submission fails to demonstrate how the scheme would conserve, let alone enhance, the exceptional natural beauty of the site; nor does it show how it would further the statutory purposes of the designated landscape in line with Government guidance for relevant authorities on seeking to further the purposes of protected landscapes. This is contrary to national policy and CP7 of the Tonbridge and Malling Core Strategy.

This proposal, involving extensive industrial-scale development, would result in substantial visual intrusion, significant adverse impacts upon tranquillity, and erosion of the special qualities for which the landscape was designated, all of which are wholly incompatible with its protected status. The proposed scheme involves the construction of two substantial industrial buildings (up to 14.8 metres in height), extensive hardstanding, and significant earthworks that would profoundly alter the character and appearance of this sensitive landscape.

The development would significantly impact key views from publicly accessible vantage points, including from open access land at Golden Nob and nearby public rights of way. The Kent Downs National Landscape (KDNL) team highlights that existing tree coverage, which currently provides partial screening, will be drastically reduced, removing significant Category B mature trees (groups G23 and G24). The proposed mitigation measures, involving only minimal replacement planting, are considered wholly inadequate and ineffective, especially given the development's proximity to site boundaries and the significant visibility from elevated viewpoints on the Kent Downs escarpment. The KDNL team notes particularly that the landscape visual impact assessment (LVIA) submitted by the applicant underestimates the sensitivity of viewpoints, misrepresents the scale of landscape change, and inadequately assesses the long-term visual impacts.

Specifically, Paragraph 189 of the NPPF states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes. NPPF paragraph 190 sets out that permission should be refused for major development in these designated areas other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. It is CPRE Kents view that the proposal fails to meet these national policy requirements.

More significantly, it is CPRE Kents view that the proposed development fails to meet the Protected Landscapes duty under Section 85 of the Countryside and Rights of Way (CROW) Act 2000, as updated by Section 245 of the Levelling-up and Regeneration Act 2023. This statutory duty requires relevant authorities to "seek to further" (rather than merely "have regard to") the conservation and enhancement of designated National Landscapes such as the Kent Downs. However, in view of the standing objection from the KDNL team, the proposal cannot credibly be said to further the purposes of conserving and enhancing the natural beauty and special qualities of the National Landscape. Nor does it align with the relevant Defra guidance or the Planning Practice Guidance (PPG) regarding how authorities should apply the duty in practice. Instead, the scheme stands in direct conflict with the very purpose of the Kent Downs' designation, undermining rather than protecting the unique scenic, ecological, and cultural values that the National Landscape was established to safeguard.

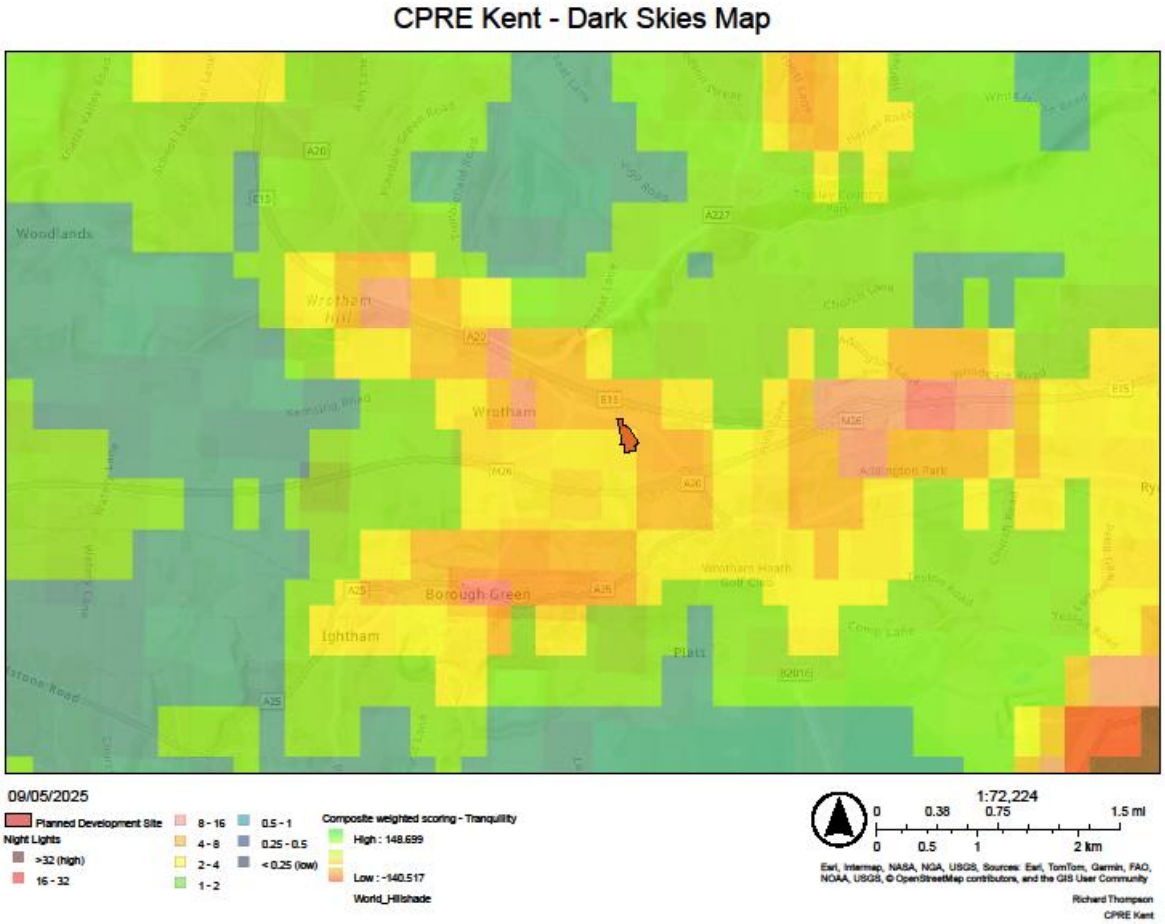
More generally with respect to Landscape impact, CPRE Kent wholeheartedly supports the Parish Council's critique of the Landscape and Visual Impact Assessment (LVIA) submitted by the applicant. The LVIA's substantial deficiencies, notably its failure to adequately account for significant tree removal and underestimation of visual impacts, severely undermine its credibility. Will also agree that the proposed mitigation measures are entirely insufficient, providing negligible visual screening due to inadequate spacing and minimal new planting within the development boundaries. The resulting adverse impacts identified—permanent and irreversible major visual harm—are starkly at odds with national policy (NPPF

paragraph 176) and local policies (Core Strategy Policies CP7 and CP24, and Policy SQ1 of the Managing Development and Environment DPD).

2) Light pollution

Linked to the above, the proposal introduces a profound loss of tranquillity and dark sky conditions, vital qualities underpinning the Kent Downs' designation. The scheme proposes extensive lighting, required to facilitate the proposed 24/7 operations, thereby significantly increasing sky glow. The substantial scale of this industrial scheme, incorporating extensive floodlighting, perimeter illumination, loading bays, and numerous roof lights, would undoubtedly intensify skyglow, significantly reducing local residential amenity, negatively impacting wildlife, and eroding the rural character of the locality.

As shown below, CPRE's dark skies mapping indicates this site is currently of relatively low brightness, and therefore, the proposal would substantially degrade night-time tranquillity, directly contravening Principle SD7. As the KDNL team identifies, the LVIA notably fails to provide an adequate assessment of these night-time impacts, leaving significant concerns regarding the true scale of harm unresolved.



Nationally, CPRE vigorously campaigns for the protection and enhancement of dark skies as crucial for ecological integrity, human wellbeing, and maintaining the intrinsic character of the countryside. CPRE Kent fully supports this national stance, actively seeking measures to prevent and mitigate light pollution within Kent. Regrettably, despite assurances in the applicant's External Lighting Report that luminaires have been selected to minimise upward light spill and glare, and to comply with an E2 environmental zone standard, the actual illumination levels detailed within the submitted report considerably exceed baseline targets. For example, proposed lighting achieves illuminance levels substantially above the recommended averages

set by British Standards (BS EN 12464-2:2014 and Lighting Guide LG6), including service yards averaging between 30 and 39 lux, loading bays reaching 77 lux, and building entrances illuminated up to 80 lux, far exceeding the levels anticipated for a rural-edge location.

The cumulative impact of this extensive lighting installation, coupled with the site's 24-hour operational activity, directly conflicts with local planning policy CP24 of Tonbridge and Malling's Core Strategy, which seeks explicitly to protect local amenity and minimise pollution. It also contravenes paragraph 198(c) of the National Planning Policy Framework, requiring planning decisions to limit the impact of artificial lighting on local amenity, intrinsically dark landscapes, and ecology. In view of these clear conflicts with both local residents' concerns and policy obligations, CPRE Kent trusts that significant planning weight will be afforded to these issues, influencing any subsequent decision-making on this application.

3) Failure to demonstrate "Very Special Circumstances" for development within the Green Belt

CPRE Kent are not convinced that the applicant has demonstrated the "very special circumstances" required to justify major development in the Metropolitan Green Belt. As has been pointed out by Wrotham Parish Council, the proposed substantial buildings, ranging from 11m to 14.8m in height, dramatically exceed the scale of existing structures, leading to significant and detrimental impacts on the openness of the Green Belt. The National Planning Policy Framework clearly states at paragraph 153 that substantial weight must be given to any harm caused to Green Belt openness, and that development should not be approved unless the identified harm is clearly outweighed by other considerations.

Further, CPRE Kent echoes the Parish Council's detailed critique of Tonbridge and Malling's Core Strategy Policy M1. This policy stipulates that redevelopment within the designated Major Developed Site must lead to an overall improvement in the environment, protect the landscape setting, and not exceed the height or extent of existing buildings. Clearly, the proposed development falls significantly short of meeting these stringent policy requirements, as identified by the Parish Council. CPRE Kent strongly agrees with the Parish Council's assertion that the generic design and sheer scale of the proposed industrial units would neither improve nor integrate sensitively into the surrounding Green Belt landscape, thereby breaching both local policy M1 and the national Green Belt policy set out in the NPPF.

4) Ecological Impact

CPRE Kent has significant concerns regarding the level of regard given to on-site biodiversity, particularly due to outstanding ecological survey data at the time of the application submission. The applicant's planning statement explicitly states that additional invertebrate surveys remain incomplete despite the Invertebrate Habitat Assessment clearly identifying the site as having "high potential" to support notable invertebrates. It is concerning that such crucial ecological baseline data has not been provided from the outset to inform the ecological design and mitigation measures of the scheme. National policy and best practice require developments to follow the ecological mitigation hierarchy, and leaving such key information incomplete undermines the capacity to properly assess and address the impacts of the development on important biodiversity assets.

Similarly, CPRE Kent is concerned about the approach being taken towards bat populations on the site. The applicant's own dusk emergence surveys identified a diverse assemblage of bats, including common pipistrelle, brown long-eared, Leisler's, noctule, and serotine, with boundary habitats noted as being of particularly high value for foraging and commuting activity. Despite these clear sensitivities, particularly regarding light disturbance for nocturnal species, the application proposes extensive and intensive artificial lighting to facilitate 24-hour site operations. As previously highlighted in our objection regarding light pollution above, the External Lighting Report confirms significantly elevated lighting levels across large areas of the site, directly conflicting with the stated recommendations in the applicant's bat survey for

minimising fragmentation and disturbance impacts on bats. This contradiction undermines the viability of ecological mitigation and enhancement measures, including the proposed bat boxes and retention of boundary habitats.

Additionally, CPRE Kent is concerned by the Biodiversity Net Gain (BNG) shortfall identified within the submitted Biodiversity Metric Calculation, resulting in the substantial on-site biodiversity loss of -8.76 habitat units and -0.17 watercourse units, totalling a net reduction of 10.97 habitat units. The applicant proposes to address this significant deficit through off-site mitigation, yet has provided no robust justification or evidence explaining why on-site provision is not feasible. It appears to CPRE Kent that the reliance on off-site compensation appears largely driven by an inappropriate desire to maximise the built footprint, at the expense of critical ecological constraints and opportunities.

5) Residential Amenity Impact

Regarding residential amenity impacts, the proposal's proximity to numerous residential properties along London Road and Whitehill, coupled with the proposed flexible B2 industrial uses, raises significant risks of noise, vibration, odour, and other disturbances. As has been highlighted by Wrotham Parish Council, the inadequacy of the submitted noise assessment, which solely addresses HGV movements, neglect the broader potential range of disruptive B2 uses such as heavy manufacturing or recycling operations. Exacerbating these concerns is that fact that the two largest buildings are to be operational 24 hour and that no comprehensive odour or vibration assessments have been provided.

Additionally, CPRE Kent share the Parish Council's specific concern about the proposed buildings' sheer scale and positioning, which would result in unacceptable overbearing and overshadowing effects, significantly diminishing residential amenity. The buildings, reaching heights of up to 14.8 metres, would dominate and substantially reduce sunlight and daylight availability to nearby homes, contrary to Core Strategy Policy CP24 and Policy SQ6 of the Managing Development and Environment DPD.

6) Unsustainable location.

Local policy CP2 of the Tonbridge and Malling Core Strategy explicitly states that new developments generating significant travel demand must minimise the need to travel, provide genuine choice in travel modes, and ensure good access to service centres. Whilst the previous use of the site is noted, it reams that the site is isolated from frequent public transport services, with the nearest bus stops located at Wrotham High Street, approximately 1.1km (15 minutes' walk) away, and offering only limited and infrequent weekday services with no weekend provision.

The national policy context within paragraphs 109–118 of the NPPF clearly emphasises the importance of locating significant developments where sustainable transport options are genuinely viable. The submitted Travel Plan however acknowledges the site's heavy reliance on private vehicle trips, noting explicitly that due to its function as a logistics and industrial hub, many journeys will necessarily be undertaken by van or private car. The Travel Plan admits substantial deficiencies in realistic sustainable transport options, noting limited pedestrian connectivity and the complete absence of convenient public transport access at peak operational hours.

The realistic potential for meaningful modal shift by cycling or pedestrian means is therefore severely constrained by the site's distance from main residential centres, such as Borough Green railway station (2.7km away) and the lack of integrated, safe, and continuous routes. This reliance on private vehicles, acknowledged implicitly throughout the Travel Plan, stands in direct conflict with local Core Strategy policy CP2, and national policy objectives designed explicitly to limit travel demand and foster sustainable transport solutions.

Overall Conclusion

As set out above, CPRE Kent object to this proposal due to its significant adverse impact upon the Kent Downs National Landscape, excessive and damaging levels of artificial lighting, failure to demonstrate the very special circumstances required for development in the Green Belt, inadequate ecological assessments and unjustified biodiversity loss, unacceptable harm to local residential amenity, and its clearly unsustainable location.

It is therefore CPRE Kents view that the adverse impacts of the proposed development outweigh any purported benefits arising from the scheme. We therefore fully support the Council should they rightly refuse this application.

Yours sincerely

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