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12/05/2025

Mr. James Moysey MRTPI
Principal Planning Officer – Major Projects
Tonbridge and Malling Borough Council

Dear Mr. Moysey

RE: OBJECTION – Application 25/00599/PA - 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 at Former Marley Tiles site, London Road, Wrotham, Sevenoaks, TN15 7RW.

1. Introduction

1.1 HIGHGATE Planning & Development Consultants have been instructed by Wrotham Parish Council to review planning application 25/00599/PA - 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 at Former Marley Tiles site, London Road, Wrotham, Sevenoaks, TN15 7RW.

1.2 We have reviewed all the planning documentation associated with this application and write to object to the proposal on behalf of our clients. Whilst they do not object to the principle of some form of development of this site, it is clear that the proposed scheme is cramped and overdeveloped, with no regard to the sensitive landscaping of the Kent Downs, neighbouring amenity, heritage, ecology or on site trees.

1.3 This objection should be read in conjunction with the following supporting documents:

- **Appendix 1** – Landscape Visual Statement prepared by Mark Topping, Lanpro

1.4 This statement sets out a review of the planning documents and addresses the key relevant issues for the determination of the application. It concludes that the proposal is not in

accordance with the development plan and national policy, and that no material considerations exist to justify a departure from them.

1.5 The benefits identified by the applicants, when weighted against the harm that would occur, particularly to the setting of the Kent Downs National Landscape, are clearly and significantly outweighed by those harms, such that planning permission should be refused.

2. Background & Policy Context

2.1 The site is comprised of the former Marley Tiles site, located within the Green Belt in the Parish of Wrotham, Tonbridge & Malling. The site is predominantly covered in open hardstanding, with only a few existing buildings of fairly limited height.

2.2 The site is located almost directly adjacent to the Kent Downs National Landscape, the boundary of which lies immediately on the opposite side of the access on London Road. The national landscape boundary also continues to the west, following the line of a nearby footpath and running southward.

2.3 This land forms part of the Kemsing Vale Landscape Character Area (LCA), an important part of the setting of the national landscape due to its degree of consistency with the typical landscape features of the Kent Downs. This is an area under significant development pressure from existing industrial estates and other unsympathetic land uses within its setting. This includes a recent approval for a large HGV parking & service station, currently subject to judicial review for grounds including failing to properly consider the effect on the national landscape.

2.4 The site is also within the Nepicar Area West Major Developed Site under current TMBC adopted policy. The implications for this will be considered in more detail later in this statement.

2.5 The wider site context is considerably varied, including open fields and countryside, other commercial sites, and also a significant number of residential properties along London Road and Whitehill to the west.

2.6 The former Marley Tiles operation operated only to normal working hours and comprised some open air storage across hard surface areas and a small collection of buildings.

3. The proposed development

3.1 We note that the applicant is variously listed as either CP Logistics UK Sevenoaks Propco Ltd (for example on the application form), or as Panattoni in various planning documents. It is not fully clear if this is a subsidiary or associated company given the inconsistent references. Either way, the applicants seek permission for the demolition of existing buildings and the erection of 2 substantial warehouse buildings.

3.2 Units 1a - 1d are proposed for B8 Use, whilst Units 2 and 3 for flexible B2 (general industrial) or B8 use. Alongside the large warehouse buildings there would also be ancillary office space, revised access arrangements, servicing parking and landscaping.

3.3 The site plan shows these in two main blocks, with units 1a – 1d located along almost the entirety of the northern boundary. Unit 2 is also part of this cluster, proposed for either B2 industrial or B8.

3.4 Unit 3 would be detached and located further along the site's southern boundary. In between the buildings would be expansive areas of parking and servicing. Landscaping is predominantly limited to the small areas behind the buildings or existing open parts of the site, for example adjacent to the entrance. Many hedges and tree planting areas portrayed on the landscape plan are located either outside of or on the limits of the red edged site location plan. In reality, this means that they would not provide sufficient screening within the land controlled by the applicants.

3.5 Both sets of buildings are substantial, both in footprint and elevation. Full two storeys for the entirety of their length, the structures reach 11 - 14m to the ridge. The submitted plans show dark cladding materials and a shallow roof pitch to maintain the high ceilings through all of the buildings. Surrounding the buildings are expanses of parking and service areas.

3.6 One particularly troubling aspect of the proposal is that 24-hour, 7 day a week usage is sought, as specified in page 13 of the application form. The objection must be seen in that context in all relevant strands of complaint – from landscape to Green Belt to neighbouring amenity. This is discussed in further detail below.

4. Planning Assessment

4.1 This chapter sets out the most relevant planning issues for consideration of the development, in order to demonstrate clear policy conflict. We consider that the key planning issues for the determination of this application are as follows:

- The principle of the development at this location, including the impact on the Green Belt, whether the development is appropriate, the effect on openness, and any conflict with the purposes of including land within it.

- The effect of the development on the character and appearance of the area / its visual impact, including on the setting of the Kent Downs national landscape.

- The effect of the development on the amenity of neighbouring residential properties

- The effect of the development on the safety and operation of the road network, including local roads and the strategic highway network, from trip generation

and vehicle movements, and whether this would unacceptably affect highway safety, or whether it would lead to severe cumulative traffic build up.

- If the development would harm protected species, ecology or biodiversity, and if so whether adequate mitigation is proposed and if it can be delivered.

- The effect on nearby heritage assets.

- If sufficient very special circumstances have been evidenced, such that the harm to the Green Belt, and any other harm, are clearly outweighed by the benefits of the scheme. This includes consideration of planning policy support for new lorry parks.

4.2 These matters are addressed in turn as follows.

Principle of the development / Green Belt

4.3 The site is located within the Green Belt, and whilst it is currently previously developed land and designated as a "Major Developed Site in the Green Belt" under policy M1, this does not mean any development of any scale is acceptable. Policy M1 is clear that:

Within the Major Developed Sites in the Green Belt, as defined on the Proposals Map, infill development or redevelopment will be permitted where all of the following criteria are met:

(1) it does not lead to any greater impact on the openness of the Green Belt and the purposes of including land within it;

(2) it leads to an overall improvement in the environment, does not harm the landscape setting, includes provision for the maintenance of landscaped areas and appropriately integrates with its surroundings;

(3) any changes to traffic generated can be satisfactorily accommodated without conflict with rural amenity and without prejudice to highway safety and if possible bring beneficial changes;

(4) it does not exceed the height of existing buildings;

(5) for infill development, it does not result in an extension to the currently developed extent of the site; and

(6) for redevelopment, the proposed coverage of the site by buildings (i.e. the footprint) is no larger than the ground floor extent of the original buildings unless occupying a larger footprint would achieve a reduction in height which would benefit visual amenity and reduce impact on the wider Green Belt.

4.4 This policy is considered to be generally consistent with the requirements of the NPPF and therefore not out of date. Furthermore, in respect of this specific site, the policy sets out additional requirements that any redevelopment must comply with:

- *respecting the setting of the site within the wider landscape;*
- *integration of development into the area;*
- *inclusion of a high quality roofscape to protect long distance views;*
- *provision of a satisfactory access;*
- *achievement of a satisfactory noise climate in accordance with saved Policy P3/17 (or its successor Policy) having regard to the proximity of the A20;*
- *investigation and remediation of any land contamination;*
- *respecting the setting of the listed building to the south east of the site; and*
- *any necessary mitigation measures identified as a result of an archaeological assessment.*

4.5 It is evident that policy M1 is not an unrestricted license to develop this Green Belt site irrespective of any resulting harms. Proposals must comply with all of the above criteria in order to be in accordance with the development plan.

4.6 In respect of national policy, despite recent changes to the NPPF, it is considered that it remains equally qualified in respect of development within the Green Belt.

4.7 Paragraph 142 of the NPPF is clear that "*The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence*."

4.8 Paragraph 153 sets out that "*When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations*."

4.9 When redeveloping previously developed land in the Green Belt, the NPPF confirms that it is only appropriate where: "*the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings… **would not cause substantial harm to the openness of the Green Belt***."

4.10 We consider that the development fails to comply with both the criteria set out under policy M1 and within the NPPF for the following reasons.

4.11 Firstly, in respect of policy M1, the development of substantial blocks of 11m – 14m high warehouse buildings would clearly have both a greater and substantial impact on the

openness of the Green Belt. Furthermore, (and for reasons set out later in this statement), it would not lead to an overall improvement in the environment and would harm, not respect, the landscape setting of the Kent Downs. It would not appropriately integrate with its surroundings.

4.12 Thirdly, it would substantially exceed the height of existing buildings, as well as dramatically extending their footprint. There is not provision of a high quality roofscape to have regard to the surrounding landscape; the designs are just generic warehouse buildings which fail to respond to the sensitive context of the site.

4.13 Therefore, it is very apparent that as far as policy M1 is concerned, the proposal would fail to comply with the criteria established to permit redevelopment of this Major Developed Site.

4.14 Turning to the requisite Green Belt tests in the NPPF, given the dramatic and substantial enlargement of built form, height, bulk, mass, scale and spread, it is considered that the threshold of "not cause substantial harm to the openness of the Green Belt" is breached. There would be substantial harm to openness given the expanse of units, their 11m -14m heights and extent of site coverage. Added to which, there would be increased vehicle movements, HGV parking and intensification of noise, light and activity, compounding the harm to openness. This is compounded by the desire for 24-hour, 7 day a week unrestricted operations – these effects would be constant at all times of the night, worsening harm to Green Belt openness.

4.15 For these reasons, the test under paragraph 153 is failed.

4.16 Finally, paragraph 155 of the NPPF provides a further exception, without any qualification in respect of Green Belt openness, as follows:

The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:

a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;

b. There is a demonstrable unmet need for the type of development proposed;

c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework

4.17 Even if the site was considered Grey Belt on the basis of it constituting previously developed land, the definition excludes sites where footnote 7 policies (for example harm to heritage assets or the national landscape provide a strong reason for refusal. Furthermore, it is far from clear that the development complies with the other criteria

listed at (b) and (c). Paragraph 155 is clear that all of these criteria must be satisfied in order to benefit from this exception.

4.18 Firstly, concerning unmet need, the applicant's only evidence appears to be a short letter from property consultants Avison Young. The letter notes that at Panattoni's much larger Aylesford development, up to 1,700,000sqft of commercial storage and distribution space has now been delivered. It further sets out that "*recent schemes such as Loc8 at Junction 8 of the M20, which is now in its third phase of delivery, has provided multi-let accommodation from 15,000 – 60,000 sq ft. In addition, Wrenbridge has developed Click Aylesford, located off junction 5 of the M20. This provides c.300,000 sq ft in 6 units with 3 now let and a further 2 under offer with units from 15,000 sqft up to 105,000 sq* ft"

4.19 Plainly all of these developments have made a very substantial contribution to the need for commercial B8 / B2 space in the borough; Panattoni Aylesford is one of the largest commercial developments in the country.

4.20 The letter then concludes with vague references to continued demand for commercial space, although concedes that "*although for buildings of this size and the companies that occupy them it is crucial that they can see, touch and feel completed buildings before making a commitment*"

4.21 We submit that this is nowhere near sufficient information to clearly show that there is a "demonstrable unmet need" for this development, in this location. The letter effectively admits this is a speculative build and the market demand will be tested once the units are finished. Given the substantial volume of new commercial floorspace recently delivered in Tonbridge & Malling, including by potentially the same applicant, it cannot be argued that there remains a "demonstrable unmet need" for more at this location, and of this type of use.

4.22 In any event, the author of the letter clearly has a vested interest in the application's success, since by their own admission they are retained as joint agents for disposal of the commercial space if consented. No weight can be attributed to this letter.

4.23 Furthermore, The TMBC's Employment Land Needs Report (November 2017) referenced in the planning statement is now 8 years old, and therefore substantially out of date; preceding the delivery of the more recent developments helpfully listed by the applicant and cannot be relied upon.

4.24 Secondly, the site is not in a sustainable location. The land is devoid of public transport options being in the middle of an essentially rural location. The nearest bus stops are a significant distance either to the west in Wrotham village, or south near the Holiday Inn on the other side of the M26 junction. All employees will be solely reliant on private car to access their place of work, which is the antithesis of sustainable development. There is not a single option for public transport apart from private car.

4.25 Accordingly, the development would not comply with paragraph 155 of the NPPF. There is not a demonstrable unmet need for this type of development in this location, and neither would it be sustainable.

4.26 The consequence of this is that the development is therefore inappropriate development in the Green Belt. Substantial weight must be given to this definitional harm, plus the resulting harm to openness, which would be severe. The development must demonstrate very special circumstances in order to clear this significant policy hurdle. This will be returned to later.

Character and appearance / Kent Downs national landscape

4.27 This objection is accompanied by Landscape Visual Statement prepared by Mark Topping, Landpro. His findings are summarised as follows:

- The development proposes the removal of extensive numbers of trees, with no care for their landscape contribution or beneficial visual screening effects
- The loss of these trees compounds the harm arising from the scale and bulk of the proposed buildings
- The applicant's LVIA deficiently ignores the visual effects of tree removal and understates the resulting landscape impact
- Permanent and irreversible major adverse effects would arise from the development
- Due to limited tree retention there is insufficient space within the site boundaries to instigate meaningful visual mitigation
- This is a development led purely by a desire to maximise the built footprint, with no understanding or respect for the landscape fabric within which the site sits.
- It fails to understand the importance of the setting of the national landscape and even the applicant's own LVIA enforces the view that some 15 years post development, the landscape and visual impact would remain major adverse from several critical viewpoints.

4.28 Furthermore, we note the strong objections from the Kent Downs National Landscape unit, whose case we firmly agree with, aligning with the findings of Mr. Topping. They note the stark scale and bulk of the buildings, clearly designed with no consideration for the sensitive landscape setting that the site is located within.

4.29 Section 11A(1A) of the National Parks and Access to the Countryside Act 1949 imposes a statutory duty on decision making bodies to seek to further the purposes of the national landscapes. This was strengthened by Section 245 of the Levelling-up and Regeneration Act 2023 from its prior wording of "have regard to".

4.30 In the case *New Forest National Park Authority v Secretary of State for Housing, Communities and Local Government* [2025] EWHC 726, the courts have provided initial guidance on how that should be interpreted. If development is in conflict with the

purposes of the national landscape or will undermine their fulfilment, the authority ought both to consider whether and to explain why they have decided that planning permission may justifiably be granted. There is no justification to allow this scale of development here, in direct conflict with this statutory duty and subject to a clear objection from the national landscape unit.

4.31 For the reasons set out above there would be serious harm to the national landscape through further detrimental development within its setting. This is compounded by unsympathetic development already present in this area and the proposals for the Moto HGV lorry park to the west of the site. These cumulative harms would amount to further significant deterioration of the national landscape if this application was to be permitted.

4.32 Additionally, visual and aural harm to the setting of the national landscape would arise from the proposed 24 hour usage, with no respite to the rural Kent Downs landscape or its dark skies. This is in direct contrast to the previous usage which was not a 24 hour / 7 day a week operation, which at least limited its activities therefore mitigating the effect of the baseline use. This application has no such regard, compounding its detrimental effect on the landscape and local character though unrelenting noise, light pollution, disruption and constant HGV movement and activity.

4.33 Aside from harm to the national landscape and its setting, there would also be harm to the character and appearance of the area. The commercial buildings would be substantial in scale, appearing as dominant and detracting features out of character by virtue of their size, even against existing commercial development on neighbouring sites.

4.34 Accordingly, for all of the reasons set out above, there would be direct conflict with policies CP24 and CP7 of the TMBCS, SQ1 of the MDEDPD and paragraphs 176 and 130 of the NPPF. Additionally, there would be clear conflict with the principles and policies of the Kent Downs AONB Management plan, including policies SD1, SD2 and SD8, and MMP2.

Neighbouring Amenity

4.35 The site is not within an isolated commercial area but lies in close proximity to a number of residential properties and their gardens, along London Road, Whitehill to the west, and in the farms and country houses to the south.

4.36 It is therefore greatly concerning to see that flexible B2 use is proposed for units 2 and 3, particularly since unit 2 is located very close to the boundary with several residential properties just beyond to the north. For the avoidance of doubt, B2 uses could include:

- heavy manufacturing
- food processing
- recycling and waste facilities
- factories

- engineering workshops

4.37 The application does not appear seek any qualification to the types of activity within B2 use. It must therefore be assumed that they wish to seek unrestricted flexible B2 use, which could include any of the above. And as noted above, the use proposed is to be 24 hours a day, 7 days a week.

4.38 Despite this, the application does not demonstrate acceptability regarding impact on neighbouring amenity from the range of potential activities that could be conducted if unrestricted 24 hour B2 use is consented. This includes odour from waste and recycling plants or food manufacturing. There is no odour report and the noise report is also deficient in only considering "*the impact of HGV movements, inclusive of unloading and loading noise*."

4.39 None of the applicant's submitted documents appear to consider the effect of the very broad range of B2 uses being sought on a continuous 7 day a week basis. This extends far beyond simply the HGV movements, and also includes the very real likelihood of significant noise generation from heavy manufacturing and commercial B2 uses. The application is materially deficient in this regard and must be refused.

4.40 It is also noted that policy E2 places important safeguards on the redevelopment of the Nepicar Area West, mandating that:

"*The areas…. are considered suitable for continued employment use subject to new development creating no unacceptable impact on residential or rural amenity by virtue of noise, dust, smell, vibration or other emissions, or by visual intrusion, or the nature and scale of traffic generation*."

4.41 Inadequate information has been provided to confirm any of these matters. The noise survey is far too limited in scope to adequately demonstrate an acceptable climate for the potential B2 uses that could occupy the units. No odour report or vibration assessment has been advanced. Given the close proximity of these residential dwellings, this is an unacceptable an inexcusable failing – even more so given that the applicant wishes to carry out these operations 24 hours a day, 7 days a week. There would be no respite for neighbouring properties and therefore these matters need proper and transparent consideration before a decision can be made.

4.42 Finally, aside from the consequent effects of the commercial use, the sheer height and scale of the new units is considered to have a detrimental overbearing and enclosing effect on the neighbouring properties (particularly Hildene, London Road) as well as loss of light and overshadowing, being located to the south and obstructing sunlight for significant periods of the day.

4.43 In summary, the application is seriously deficient in these respects, and it is surprising that these matters have not been properly considered. The application fails to comply with

policy E2 and SQ6 by not safeguarding neighbouring amenity including through noise, dust, vibration or overbearing and overshadowing effects.

Protected species, ecology and biodiversity

4.44 We note some of the submitted bat surveys are almost 1 year old. As a result they could be out of date and revised surveys should be submitted to confirm the position. This could result in conflict with policy NE3 of the MDEDPD, and paragraphs 174 and 180 of the NPPF.

4.45 Furthermore, the development results in the loss of -8.76 habitat units and -0.17 watercourse units with a net reduction of 10.97 habitat units. It is stated that off site habitat units will be needed to address this shortfall and provide the legally required 10% biodiversity net gain. However, no evidence has been provided as to why on-site provision has not been provided, which should be considered before off site mitigation is permitted. Once again, this appears to be the result of a desire to maximise on sight development with no regard to existing ecology constraints, including the paving over of a culvert.

4.46 We further identify conflict with the proposed lighting levels across the site, designed to facilitate 24 hour usage, with the recommendations in the bat surveys. The applicant has failed to take the advice of its own ecologists and proposes inappropriate lighting which will be detrimental to legally protected species.

Heritage Assets

4.47 The site lies close by to the Grade II Listed Moat Restaurant, a pub and community facility which serves as a venue for weddings, funerals and a range of events and functions. The list description is set out as follows:

Moat Restaurant – Grade II

Farmhouse, now Restaurant. C16 framed structure with C18 elevations. Painted brick ground-floor, tile-hung 1st floor. Hipped plain tiled roof with one flat-headed dormer and C17 stacks at left end and off-centre to right. 2 storeys and attic; 4 window 1st floor, 3 window ground-floor, C20 diamond lattice casements. Half-glazed panelled door with C20 flat projecting hood off-centre to right. T-shaped in plan with weatherboarded wing to rear.

4.48 The setting of this important heritage asset is already compromised by nearby commercial development; but the proposal would demonstrably erode this position even further with the erection of substantially taller commercial buildings which would tower over the Listed building and its setting, and with constant noise and activity from the 24-hour use.

4.49 Furthermore, being located to the west, there is a real possibility of sunlight being obstructed in the afternoon and evening as a result of the scale of the commercial structures. This would be hugely detrimental to the enjoyment of the venue as a community facility and drinking establishment, with a real prospect of reduced trade and footfall.

4.50 The consequences of this could be severe for the business, and given the location it is very difficult to think of any alternative viable uses. If the business is forced to close, the outcome could be the site failing into disrepair, an unwelcome outcome for this designated heritage asset and community facility.

4.51 Furthermore, the scale, bulk and mass of the buildings as well as non-stop noise and activity on the site would further erode the setting of the heritage asset, which would have once stood in open countryside devoid of modern commercial buildings. Whilst the existing position may not be sympathetic to its original setting, this does not justify increasing this harm even further with an even less sympathetic development.

4.52 Remarkably, the applicant's heritage statement attempts to suggest the 14m high buildings would not be visible from the setting of the Listed pub, or other assets further afield: "*though the proposed warehouse is more substantial in size than the existing structures on the Site, it is situated within a central position within the plot and therefore unlikely to be visible from the setting of the surrounding heritage assets*" (para 4.2, Heritage Statement).

4.53 This conclusion is totally inaccurate to the extent that the rest of the report simply cannot be relied upon as a useful assessment of the impact on nearby heritage assets. Furthermore, the suggestions of mitigation at 4.6 fail to consider the excessive tree removal and limited spacing to site boundaries. In essence, they propose mitigation that is neither proposed on the landscape plan nor possible given then dominance of the buildings and hardstanding on the plot.

4.54 In summary, the report is not robust and fails to recognise the sheer scale of the buildings that will plainly be visible from the Grade II Listed Moat restaurant. It makes no mention of the impact on the optimum viable use of the heritage asset, the overbearing effect caused by their scale and bulk nor the detrimental effect of 24 hour operations, causing further harm to the landscape setting which contributes to how the asset is experienced.

4.55 For these reasons the development would not accord with s66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, NPPF paragraphs 210, 212, 213 and 215.

5. <u>Conclusions & Planning Balance / Very Special Circumstances</u>

5.1 We have identified significant policy conflict in respect of Green Belt, the National Landscape and its setting including the character of the area, highways impacts, and harm to protected species. National policy is clear that harm to Green Belt cannot be

justified unless very special circumstances (VSCs) exist to clearly outweigh both the harm to the Green Belt and any other harm.

5.2 It would be obvious to a layperson without experience of planning matters that the buildings are far too large for the site, and the development is led purely by maximising the developed area with no regard to the sensitive landscape, trees, ecology or heritage context.

5.3 The applicant's claims that this is a sensitive, landscape led proposal do not withstand any objective scrutiny. There is no indication of restraint in the designs, and the proposals for generic warehouse units could be found on any industrial estate. They are not appropriate for a site on the edge of the Kent Downs National Landscape.

5.4 The uses proposed are unneighbourly and would harm the amenity of nearby residential properties. The intensification of the site in conjunction with the introduction of B2 uses would have a materially greater impact on nearby dwellings. The applicant's noise survey is deficient by only assessing impacts from HGVs; it has not bothered to consider industrial noise generation from the B2 units. No odour report has been provided to cover the wide range of potential B2 uses which could benefit from this permission if allowed.

5.5 Furthermore, the desire for 24 hour a day, 7 day a week operations is totally unjustified and compounds all of the harms outlined in this statement. The site is not within a busy town centre or industrial estate but a rural location close to residential dwellings and adjacent to the national landscape of the Kent Downs. This kind of unrelenting industrial and logistics activity is totally inappropriate for the location.

5.6 The removal of far too many trees purely to maximise the size of the buildings results in an unacceptable loss of on-site landscaping and biodiversity. The development is cramped with no spacing to the boundaries to soften the sheer height of the 14m structures. It would tower over and dominate nearby residential dwellings and the Grade II Listed Moat restaurant, threatening its viability as a valued community and social facility.

5.7 These cumulative harms are very substantial and we do not consider that the applicant has demonstrated anywhere close to sufficient VSCs to outweigh the totality of this harm. The scheme conflicts with the development plan and national policy.

5.8 For the reasons set out within this statement, it is therefore requested that planning permission is REFUSED.

Yours sincerely

[redacted]

[redacted]

HIGHGATE Planning & Development Ltd