

**MARLEY TILES, WROTHAM**

**PRE-APPLICATION ADVICE MEETING NOTE**

**12 MAY 2022 – 15:00-16:00**

**Attendees:**

William Allwood	(WA)	- TMBC Principal Planning Officer
Tony Watkins	(TW)	- Panattoni
Ian Anderson	(IA)	- Panattoni
Alex Mitchell	(AM)	- Panattoni
Josh Butler	(JB)	- Panattoni
Matt Salanyk	(MA)	- UMC
Paul Wilson	(PW)	- BCA
Hardeep Hunjan	(HH)	- Barton Willmore
James Finn	(JF)	- Barton Willmore

**1.0 Background**

- 1.1 The purpose of this Note is to provide a record of matters agreed at the pre-application advice meeting held on 12 May 2022 regarding proposals for the redevelopment of the Marley Tiles site, London Road, Wrotham. A site visit was undertaken on 13<sup>th</sup> April 2022.
- 1.2 Initial pre-application feedback from TMBC (Robin Gilbert) provided at a meeting on 2 August 2021, indicating that the principle of development is likely to be considered acceptable, subject to the justification of 'Very Special Circumstances' if the proposals were to comprise 'inappropriate development' in the Green Belt. The development proposals will also need to be sensitively considered within the context of any effects upon the AONB.
- 1.3 The pre-application information submitted comprises a covering letter dated 21 February 2022 and the following documents:
  - Proposed Masterplan ref. 21261\_F0009 Rev C;
  - Green Belt Review Technical Note (December 2021);

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- Landscape & Visual Appraisal Technical Note (February 2022);
  - Draft Transport Scoping Note (11 February 2022).

1.4 An updated Masterplan (ref. 21261\_SK0002[B]) was tabled at the pre-application advice meeting.

## **2.0 Site**

2.1 The Site area is broadly rectangular in shape and comprises 3.27 ha in area. The Site is currently occupied by Marley Tiles with a main warehouse building with separate office building located within the north western part of the Site and areas of storage located to the western and southern boundaries. Service yards and areas of parking are located within the northern and eastern parts of the Site. The Site is accessed via London Road (A20) via M20 Junction 2 to the northwest and M26 Junction 2a to the south east of the Site.

2.2 In planning policy terms, the Site forms part of the Nepicar Area West Major Developed Site in the Green Belt identified in Policy M1 and is allocated for employment uses within the Development Land Allocations document, policy E2 (Nepicar Area West). The Site is located wholly within the Green Belt. In line with National planning policy, the construction of new buildings within the Green Belt is considered to constitute inappropriate development. As such it is recognised that 'Very Special Circumstances' may need to be demonstrated in favour of the development proposal to outweigh the harm resulting from the development proposals (paras 147 and 148, NPPF). The Kent Downs AONB is located to the north of the Site.

2.3 The Site has also been submitted to TMBC's 'Call for Sites' exercise which closed on 7<sup>th</sup> February for redevelopment for employment uses.

## **3.0 Development Proposal**

3.1 The development proposals comprise a Full planning application for demolition of the existing buildings and redevelopment of the Site to provide one Class B8 (storage and distribution) building with ancillary office space and associated access, servicing, parking and landscaping. The emerging development proposals comprise 5,412 sqm of floorspace within the warehouse unit with a ridge height of 11.8m and a clear internal height of 9m. The height of the building has been designed in accordance with the occupier's operational requirements, who have a specific need for this particular size of building. In terms of the elevations, the proposed colour scheme of 'chalk

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down' colour palette has been considered to align with the guidance set out within the AONB Design Guide.

- 3.2 In terms of the sites topography and the varying level differences, retaining structures will be used within the design to address the level differences. The finished floor level of the building will be 87.9m AOD with London Road at 92/93m. There will be a net cut and fill balance, reducing the need to import material from off site.
- 3.3 The initial feedback provided during the site visit regarding the masterplan highlighted concern with the removal of vegetation within the northern part of the site for car parking provision. It was also noted that the current boundary vegetation was relatively sparse and more should be done within the development proposals to improve upon the level of planting to the site boundaries.
- 3.4 The updated design and layout that was tabled at the pre-application advice meeting demonstrates how the Masterplan has evolved following the feedback provided at the site visit. The car parking spaces within the northern part of the site have been removed from the layout and replaced with strategic landscaping. Furthermore, the landscape buffer to the sites eastern and western boundaries have been enhanced.
- 3.5 At the pre-application meeting WA welcomed the further structural planting that has been incorporated into the revised Masterplan and the retention and enhancement of the vegetation to the northern part of the site which acts to soften views into the site from the AONB.

#### **4.0 Landscape**

- 4.1 The landscaping strategy now shows that vegetation to the sites northern boundary will be retained and enhanced. The landscape consultant advised that a Tree Survey has been undertaken and has shown that the Ash trees on site were found to be suffering from Ash die back so these are proposed to be removed along with some category C trees. The Silver Birch trees where they do not impinge upon the development layout will be retained, with self-set Silver Birch trees and scrub areas located within the south eastern part of the site being removed to facilitate the development. The site boundaries feature proposed re-enforced tree planting and the updated masterplan shows as much vegetation as possible now being retained. The planting species has been discussed with the ecologist to maximise biodiversity enhancement.

4.2 The landscaping scheme has been designed with the site's location within the setting of the AONB in mind in accordance with NPPF paragraphs 176, 177. The NPPF places great weight on conserving and enhancing landscape and scenic beauty within AONB's. Whilst the site itself is not located within the AONB, it is located within its setting. Paragraph 176 notes that development within the setting of AONB's should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

***Feedback Provided***

4.3 WA advised at the pre-application meeting that the site's impact upon the setting of the AONB will need to be carefully considered with a range of long distance viewpoints, developing a sensitively designed landscape scheme, the use of a colour palette for the building which has been developed in accordance with the AONB Design Guide, and the use of a sensitively designed lighting scheme.

4.4 WA endorsed the proposal's overall approach to addressing its setting within the AONB, and advised that he could see how the proposals had responded to the site's setting within the AONB, and how it been sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

4.5 WA advised engaging with Edward Jones, the Council's Tree Officer, and the AONB Unit.

4.6 WA advised that it was not anticipated that the Council would seek external landscape consultant advice in respect of the proposals.

**5.0 Approach to Green Belt Assessment**

5.2 The pre-application advice submission is supported by a high level Green Belt which considers that the Site provides only a negligible to minor contribution to fulfilling the purposes of the Green Belt. The impact on openness of the Green Belt from the development proposals will be considered within the Application.

5.2 The NPPF provides that the complete redevelopment of previously developed land, whether redundant or in continuing use, would not comprise inappropriate development in the Green Belt

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provided that the proposal would not have a greater impact on the openness of the Green Belt than the existing development (para 149(g)).

5.3 In the event it is considered that the proposals would comprise 'inappropriate development' in the Green Belt by virtue of having a greater impact on openness than the existing development, the applicant explained that it considered that the harm to the Green Belt and any other harm would arguably be outweighed by the following 'Very Special Circumstances' (as required by NPPF para 148):

**1. Economic Benefits**

- *The development proposals have been tailored towards a specific occupier and it is anticipated that 250 operational phase FTE jobs will result from the proposals, which is a significant increase from the 7 employees the site currently employs. Further indirect employment opportunities will also be generated.*
- *Further employment opportunities will be generated through the construction phase as well as economic investment associated with the development proposals.*
- *The proposals will facilitate the retention of Marelly Tiles, a long standing and established business, within the borough, who is planning to re-locate to the Panattoni Park, Aylesford Site (known as the former Aylesford Newsprint Site).*

**2. Environmental Benefits**

- *The existing building is outdated, and the proposals will see its replacement with a new high quality and sustainable building that will target a BREEAM rating of 'Very Good'.*
- *The existing building is energy inefficient, and the proposals will see its replacement with a building will deliver at least 10% of its energy requirement from or renewable energy sources. Furthermore, reductions in the building's CO2 emissions will be incorporated into the scheme.*
- *The proposals secure the delivery of a sustainable Travel Plan and Electric Vehicle Charging points within car parking areas.*
- *The proposals will commit to the delivery of a 10% net gain to biodiversity through a combination of onsite enhancements and a financial contribution toward off-site improvements.*
- *The development proposals will replace the existing buildings with a modern commercial accommodation that achieves a high quality of design.*

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- *The proposals will result in the more effective use of this underutilised brownfield site through its intensification, assisting in alleviating pressures to find additional land for employment uses elsewhere.*

### **3. Social Benefits**

- *The Applicant is also keen to ensure that the development proposals support local employment, skills development, apprenticeships and other training opportunities in both the construction and end-use operational phases.*

### **Feedback Provided**

5.4 WA acknowledged that the site is a long standing employment site that comprises an allocated employment site within the Green Belt. The site is brownfield in nature with existing built development.

5.4 WA agreed that the assessment of the impact of a proposal on Green Belt openness often requires a careful consideration of the effect of the proposal in visual and spatial terms.

5.5 To this extent, whilst the building and structural landscaping will be sensitively designed to minimise impact on Green Belt openness, WA acknowledged that the proposals are for a building that is of a greater height and volume than exists at present, and for a larger amount of hardstanding.

5.6 WA endorsed the approach set out by the applicant for the assessment of the development proposals in Green Belt terms and advised that should the proposals be considered to comprise 'inappropriate development' within the Green Belt, the Very Special Circumstances outlined were very strong and would likely outweigh any Green Belt harm and any other harm.

### **6.0 Approach to Biodiversity Net Gain (BNG)**

6.1 The approach to BNG will firstly apply the mitigation hierarchy whereby avoidance and minimising impacts on biodiversity will be undertaken. Compensation for unavoidable losses to biodiversity will then be undertaken and a review of whether such biodiversity enhancement can take place

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on-site or whether off-site mitigation may be required will be included within the planning application.

*Feedback Provided*

6.2 WA endorsed the approach to BNG and advised that early engagement with the Kent Wildlife Trust is undertaken to consider potential site opportunities for off-site biodiversity enhancement.

**7.0 Application Documents**

7.1 The applicant has reviewed TMBC's Local validation Checklist and set out a list of documents in the cover letter supporting the pre-application advice submission.

*Feedback Provided*

7.2 WA confirmed that for a valid application the submission documents should comprise:

- Planning Application Form and Certificates;
- Site Location Plan;
- Site Plan;
- Existing Layout, Floorplans, Elevations;
- Proposed floor Plans;
- Proposed Elevations;
- Proposed Roof Plan;
- Proposed Sections;
- Access & Tracking Plans;
- Landscape Plans;
- Design & Access Statement;
- Planning Statement;
- Transport Assessment;
- Framework Travel Plan;
- Noise Assessment;
- Air Quality Assessment;

- Flood Risk Assessment & Drainage Strategy;
- Ecological Appraisal and Protected Species Surveys, to include BNG Study;
- Green Belt Assessment;
- Landscape & Visual Appraisal;
- Built Heritage Report;
- Contaminated Land Investigation;
- Utilities Statement;
- Lighting Assessment;
- Energy Report;
- Economic Statement;
- Statement of Community Involvement.

## **8.0 Planning Performance Agreement (PPA)**

- 8.1 A PPA will be drafted to agree timescales, actions and resources for this planning application and a draft will be provided by the applicant shortly.

## **9.0 Public Consultation & Political Engagement**

- 9.1 The forthcoming development proposals will be subject to a public consultation exercise and political engagement with TMBC councillors. A timetable of events and briefings with Councillors will be provided in due course.