
Planning Statement

Land at Factory Road

Submitted on behalf of:
Bellway Homes Limited (Thames Gateway)



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1. Introduction

Introduction and Background

- 1.1 This Planning Statement has been prepared on behalf of Bellway Homes Limited (Thames Gateway) ('the applicant') in support of a Full Planning Application to be submitted to Ebbsfleet Development Corporation (EDC) for the erection of a new workshop building (Use Class E(iii)(g)) at Land at Factory Road ('the site').
- 1.2 The application falls across the jurisdiction of both Ebbsfleet Development Corporation (EDC) and Gravesham Borough Council (GBC) and accordingly an application is submitted to both.

Overview of the Development

- 1.3 The proposals comprise the delivery of a purpose-built workshop building (Use Class E(iii)(g)) at the site. This will be a two-storey building with a residential appearance to the front façade fronting onto Factory Road and will measure 149.9 sqm (GIA).
- 1.4 The description of development is as follows:

Full planning application for the erection of a workshop (Use Class E(g)(iii)), access, parking, and associated landscaping.

The Applicant

- 1.5 The applicant is Bellway Homes, a UK house builder. Bellway is involved in delivering the wider and adjacent Northfleet Embankment West regeneration. This proposal will support wider regeneration of the area.

Structure of the Statement

- 1.6 The structure of this Planning Statement is as follows:
- **Section 2** provides context to the site and surrounding area;
 - **Section 3** provides a summary of the development proposals;
 - **Section 4** sets out the relevant planning policy framework for the site;
 - **Section 5** provides an assessment of the material planning considerations arising from the proposals, and compliance with the outline planning permission; and
 - **Section 6** presents our conclusions in respect to the proposals.

Supporting Documents

- 1.7 This Planning Statement should be read in conjunction with the accompanying plans and drawings.
- **Application Form**, completed by Savills

- **Covering Letter**, prepared by Savills
- **Design and Access Statement**, prepared by BPTW Architects
- **Site Location Plan**, prepared by BPTW Architects
- **Site Plan**, prepared by BPTW Architects;
- **Existing Layout Plans**, prepared by BPTW Architects:
 - Existing Site Layout (MRT-BPTW-S01-00-DR-A-0102 C02)
- **Proposed Layout Plan**, prepared by BPTW Architects:
 - Proposed Site Layout – Ground Floor Plan (MRT-BPTW-S01-ZZ-DR-A-1001 C04)
 - Proposed Site Layout – First Floor Plan (MRT-BPTW-S01-ZZ-DR-A-1002 C03)
- **Proposed Elevations**, prepared by BPTW Architects:
 - Proposed Elevations (MTW-BPTW-H01-ZZ-DR-A-2001 C03)
- **Proposed Site Sections**, prepared by BPTW Architects
- **Street Scene Drawings**, prepared by BPTW Architects
- **Highways Technical Note**, prepared by Stantec
- **Landscaping Details**, prepared by LUC:
 - Landscape Proposals General Arrangements (13281-LUC-TW-XX-DR-L-1001 S3-P04)
- **Levels Strategy**, prepared by RLT
- **Drainage Details (Foul Sewage and Surface Water Drainage)**, prepared by RLT
- **Preliminary Ecological Appraisal**, prepared by AAE
- **Technical Note: Biodiversity Net Gain**, prepared by AAE
- **Noise and Vibration Impact Assessment**, prepared by Stantec
- **Refuse and Recycling Statement**, prepared by Stantec
- **Utilities Statement**, prepared by Stantec.

2. Site and Surrounding Area

2.1 This section provides a brief description of the site and the immediate surrounding area.

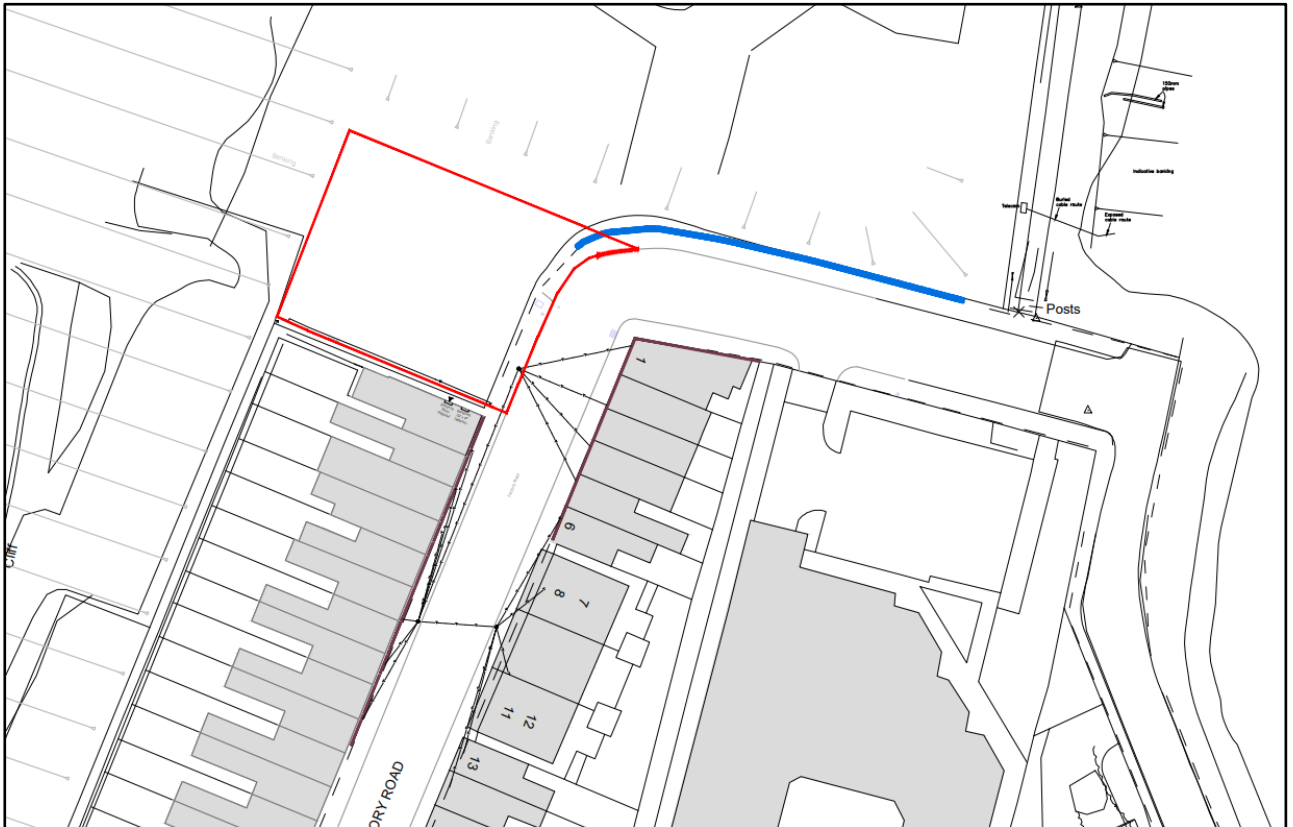


Figure 2.1: Site Location Plan

2.2 The site comprises a parcel of land measuring approximately 0.053ha. A previous commercial unit / workshop was formerly located at the site, as illustrated in the extracts below showing the former workshop unit (dating to 2008). The 1952 map extract at also shows that historically, an employment use, in the form of an industrial building, was present and established on the site. Nonetheless, it does not currently contain any built form and is predominately hard standing with some low grade, self-planted vegetation located sporadically across the site.



Figure 2.2: 2008 extract illustrating workshop use (Source: Google Maps)

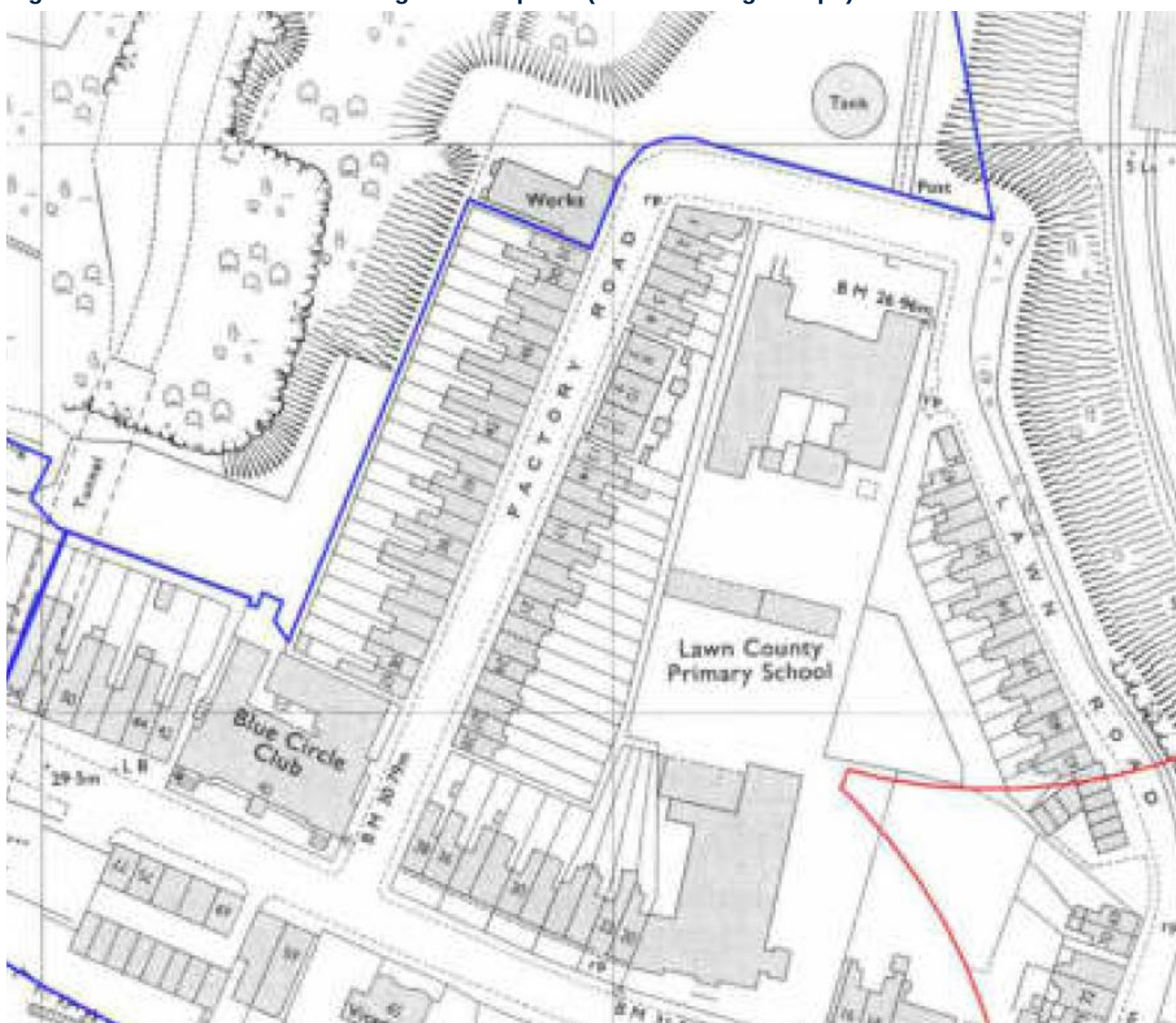


Figure 2.3: 1952 extract illustrating the factory use (Source: OS Maps)

- 2.3 The site is situated approximately 350m south of the River Thames, within the Borough of Gravesham. The site is situated at the northern end of Factory Road on the western side of road.
- 2.4 The immediate site context is that of Factory Road which is an existing linear residential street, comprising two storey terraced properties with shallow pitched roofs and rear gardens. An existing flint wall marks the northern most edge of Factory Road (shown by the blue line in Figure 2.1). Factory Road is accessed from Northfleet High Street, which has a mix of commercial and retail frontages along with residential properties.
- 2.5 The settlement of Northfleet is located south of the site, where the land use is predominately residential, with some commercial uses comprising shops and services and other local facilities including a primary school.
- 2.6 The site's context to the north is that of the wider Northfleet Embankment West site which covers a total of approximately 31.14 hectares of land and comprises the former Northfleet cement works. The cement works ceased operations in December 2008. Demolition of the majority of the buildings and structures was completed in 2010. There are existing operational wharfs and industry works along the River Thames to the north of the site and the wider area remains as an area with a mix of uses comprising residential and industry.
- 2.7 The historical presence of cement and lime works across the wider area to the north of the site has led to the wide-scale excavation of land including between the riverside and what is now Northfleet High Street, and areas to the south of the Northfleet settlement. The wider area of the site is characterised by upper and lower land levels demarcated by slopes and cliffs, with the upper level elevated up to 20m to 30m above the lower land levels.
- 2.8 The North Kent Railway Line passes close to the site and Northfleet Station is located south of Northfleet High Street. Ebbsfleet International and Domestic Stations are approximately 0.5km to the south of the North Kent Line. The site is also within easy walking distance of existing bus services on Northfleet High Street.
- 2.9 The site does not contain any listed buildings. The site lies close to but outside of The Hill Conservation Area; the Grade II Listed Factory Club lies on Northfleet High Street.
- 2.10 The site is in Flood Zone 1. It is also located within the Northfleet Industrial Air Quality Management Area declared for fugitive emissions of particulates (PM10s). The site also comprises part of the North Kent Innovation Zone which is designated as an Enterprise Zone.

Planning History

- 2.11 Outline planning permission was granted consent on 8 June 2018 for the redevelopment of the wider 'Land at Former Northfleet Cement Works' site (LPA Ref. EDC/16/0004). The site falls within the approved outline planning permission. This approved (as amended) permission for up to 567 dwellings, 46,000sqm of employment floorspace, communal open space and heritage park, community space and other associated infrastructure.

- 2.12 A Reserved Matters approval was granted at the site on 18 December 2020 (LPA Ref. EDC/20/0076) for the erection of three dwellings. The permission has been implemented through the discharge of pre-commencement conditions and the excavation of foundation trenches. No further works have been completed at the site and Bellway who own the site will not be completing any further works to construct the dwellings at the site. Bellway seek to construct a workshop at the site.
- 2.13 Below are extracts of the approved three dwellings at the site. In granting permission for these dwellings, the local planning authority considered the set-back layout of the buildings, off street parking, two-storey pitched roof elevations and brick appearance was acceptable in planning terms and assimilated with the existing street scenes. The proposed workshop at the site follows a similar layout approach to this. Therefore, it is considered the workshop proposals accord with previously agreed and approved design considerations.



Figure 2.4: Approved Elevations (EDC/20/0076)

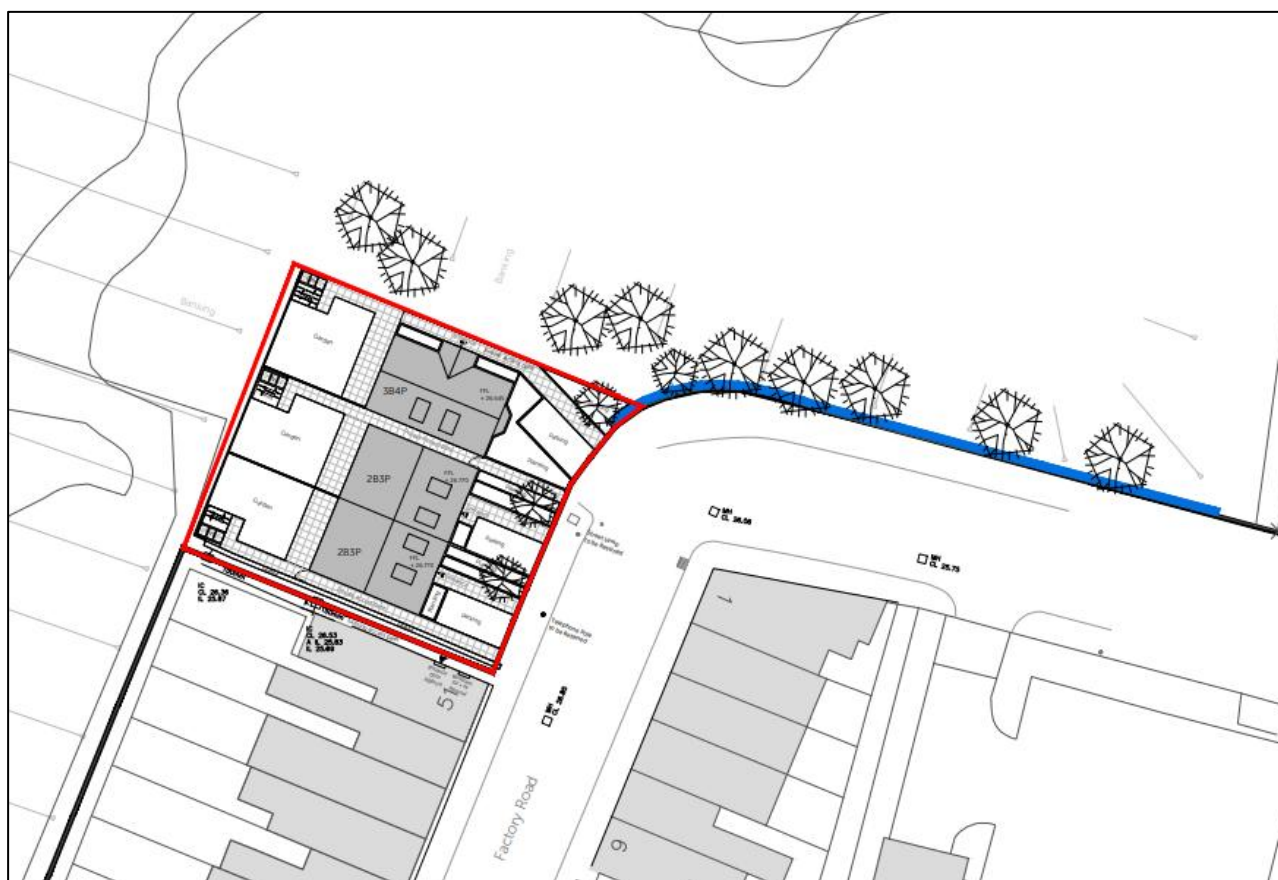


Figure 2.5: Approved Layout (EDC/20/0076)

Pre-application Engagement with Gravesham Borough Council

2.14 Prior to submission of this application, the applicant has engaged in pre-application discussions with officers at Gravesham Borough Council. Details of the emerging proposals were shared and a meeting was held with a senior planning officer. The meeting provided the opportunity to present and explain the emerging proposals and to receive feedback on the scheme. The overall feedback was positive and the officers agreed the list of application documents required to support the submission when formally made.

3. The Proposed Development

- 3.1. This section provides a summary of the application proposals. Full details are set out in the suite of planning application drawings submitted in support of this application.
- 3.2. This planning application seeks the re-development of the site with the following description of development:

Full planning application for the erection of a workshop (Use Class E(g)(iii)), access, parking, and associated landscaping.

Operations

- 3.3. The workshop will be for light industrial use suitable to be located within a residential area. There is a proposed tenant to occupy the building which has two proposed operations. These are the production of gaskets made from graphite, in which rolls of graphite will be used. And a light engineering/repair service will repair worn and broken machinery parts, produce small replacement parts and produce small component parts for machinery.
- 3.4. There is limited machinery associated with the operations: a lathe (the only noise producing machine in the manufacturing process), hand tools, and small overhead electric cranes with chains to move materials/products for replacement. There are occasions where cranes will be used to move the steel pipes from the delivery lorry into the storage area.
- 3.5. The majority of the finished goods will be posted using Royal Mail, although a limited number of customers may collect the finished goods.
- 3.6. Regarding waste, metal will be stored in a metal barrel, normal waste will be kept in a standard bin and offcuts will be kept in a small storage area in the middle of one of the workshop areas. A flat-bed lorry will collect the metal and offcuts at a maximum of once a month.
- 3.7. Below are photos of the current above operations which are currently being undertaken in a nearby premises.



Figure 3.1: Gasket manufactured



Figure 3.2: Photographs of Current Workshop



Figure 3.3: Photographs of Current Workshop

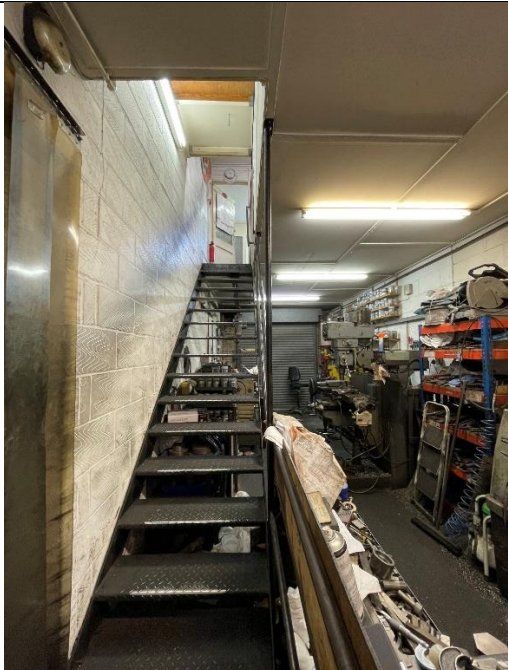


Figure 3.4: Photographs of Current Workshop

Design Approach

- 3.8. The proposals comprise a new workshop building on the site, which will be a two-storey building with a residential appearance to the front façade fronting onto Factory Road. The rear of the building, which is obscured from views from the street includes roller shutter doors to support the workshop uses of the building. A side gable roof on the workshop follows the form of the neighbouring terraced buildings. The building has been designed with due regard for both its function that dictates some of its design features, including openings for the shutter doors and service areas, whilst also ensuring it is in-keeping and respectful of the surrounding context.
- 3.9. Internally, the building has been configured so that there are two larger workshop spaces on the ground floor, alongside space for a sink and worktop, cycle parking and WC. The first floor includes storage for working materials and an office to allow for administrative duties secondary to the workshop use.
- 3.10. The workshop will have yellow multi-stock brick and slate colour roof tiles to complement the neighbouring buildings, which traditionally were yellow. The design and materials are cohesive with the outline application, with similar roof forms and openings which reference the local vernacular with details such as stone banding and soldier courses.

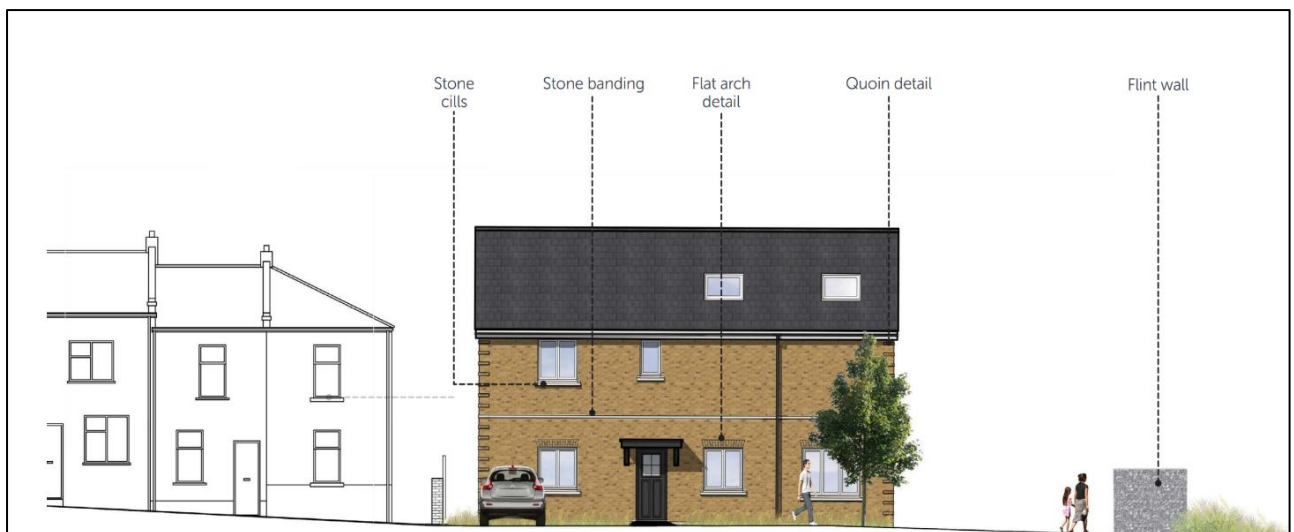


Figure 3.1: Proposed Elevations

- 3.11. Vehicle access is provided from the north eastern part of the site where it abuts Factory Road via a bell-mouth access point. A rear forecourt is provided along with three parking spaces. Two off-street parking spaces are provided in front of the building directly accessed from Factory Road.

Operating Hours of the Workshop

- 3.12. The hours that the workshop will operate are as follows:

- Monday - Friday: 7.30am – 6pm
- Saturday: 7.30am – 1pm
- Sunday and Bank Holidays: No operations

- 3.13. Operations at the workshop will be modest, and the operator specialises in the production of gaskets and metal pieces for use in industry. The impact of these operations have on neighbouring residential amenity will be negligible, as is detailed in the proceeding section of this statement.

Landscaping

- 3.14. A considered and appropriate landscape strategy is proposed. With regards to hard landscaping, concrete pavers are used for the pedestrian entrances to the building while the parking court is surfaced in asphalt concrete. Additionally, a fence will be erected on the north and western boundaries with the existing flint wall on the street and wall against the property boundary to the south to be retained.
- 3.15. In terms of soft landscaping, a variety of shrubs have been proposed to the street frontage. The boundaries to the parking court will have a hedge to soften the boundary treatments and a new tree marks the access to the parking court to the rear. Additionally, existing trees will be retained.

Parking

- 3.16. A total of 5 parking spaces are provided as part of the proposals. Two spaces are located as off-street parking spaces directly accessed from Factory Road. Three parking spaces are provided to the rear of the building access from the rear hardstanding turning area. All parking spaces will be solely for the use of employees and visitors to the workshop. The off-street parking spaces at the front of the building will accommodate disabled visitors and future EV charging.
- 3.17. Two cycle parking spaces will also be provided, in line with the adopted standards.

Servicing

- 3.18. Waste materials from the site will be stored in either metal barrels or a small storage area, and collected approximately once a month via a van. The vehicle will be required to reverse into the site access road and drive outwards and this movement is accommodated for in the site design and existing road layout.

4. Planning Policy Context

- 4.1 In accordance with Section 38(6) of The Planning and Compulsory Purchase Act (2004), planning applications should be determined in accordance with the development plan unless other material considerations indicate otherwise.
- 4.2 The redevelopment proposals for the site have taken account of relevant national and local planning policy. This section of the Planning Statement sets out a brief summary of the relevant planning policy documents, whilst the following section demonstrates compliance with these policies.
- 4.3 The National Planning Policy Framework (NPPF) (revised in December 2024, followed by minor updates in February 2025) is also a significant material consideration when determining planning applications.

National Planning Policy

- 4.4 At the national level, the Government published the revised NPPF in December 2024. The NPPF sets out the Government's requirements to local planning authorities and decision-takers when they are preparing plans and making decisions about planning applications. At the heart of the NPPF is a presumption in favour of sustainable development. When determining planning applications, this means:
- *approving development proposals that accord with the development plan without delay; or*
 - *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination. (NPPF Paragraph 11)*
- 4.5 The Government expects the planning system to deliver the homes, business, infrastructure and thriving local places that the country needs, whilst protecting and enhancing the natural and historic environment.
- 4.6 With regard to the economy, paragraph 85 of the NPPF states that planning decisions "*should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development*".

- 4.7 The Government published its National Planning Policy Guidance (NPPG) notes in March 2014. The NPPG supports the NPPF and provide high level guidance with regard to specific planning issues and processes. Where applicable, the NPPG notes are referenced within this document.

Local Development Plan

- 4.8 The site is located within the Ebbsfleet Development Corporation (EDC) administrative area. Although EDC is the determining authority for planning applications at the site, the authority has not been given plan-making powers. As such, the relevant Local Development Plan is that of Gravesham Borough Council (DBC).

Adopted Development Plan Documents

- 4.9 The statutory Development Plan covering the site currently comprises the following documents:

- Gravesham Local Plan Core Strategy (September 2014)
- Gravesham Local Plan 1st Review (1994)
- Kent County Council Minerals and Waste Local Plan 2013-30 (2020)
- Kent County Council Parking Standards (2024)

- 4.10 The following policies are considered to be the most pertinent in respect of this development:

- CS01: Sustainable Development
- CS03: Northfleet Embankment and Swanscombe Peninsula East Opportunity Area
- CS07: Economy, Employment and Skills
- CS11: Transport
- CS19: Development and Design Principles

- 4.11 The EDC Development Framework and supporting guidance are also material planning considerations.

Supplementary Planning Guidance

- 4.12 In addition, Gravesham Borough Council has adopted a number of Supplementary Planning Guidance documents as follows:

- SPG 1: Landscape Character (July 2006)
- SPG 3: Archaeology in Historic Towns (July 2006)

- SPG 4: Kent Vehicle Parking Standards (July 2006)

4.13 Gravesham currently uses the Kent Vehicle Parking Standards, which were adopted by Kent County Council in 2006, as Supplementary Planning Guidance with regards to the levels of parking to be provided within new developments; this stipulates that for Use Class E(g)(iii), there should be 1 car parking space per 35 sqm, while provision for goods vehicles may be required.

Other Material Considerations

Ebbsfleet Development Corporation Implementation Framework

- 4.14 The site and surrounding area, including the Eastern Quarry, Ebbsfleet Green and Central, Swanscombe Peninsula, and parcels of land within Northfleet now sit within the Ebbsfleet Development Corporation Urban Regeneration Area (URA). Within this area, EDC holds statutory powers to determine planning applications and ultimately support the delivery of the wider Ebbsfleet Garden City vision.
- 4.15 The EDC Implementation Framework provides an overall vision for development and will be used to inform, shape and support the delivery of EDC's work. It is important to note that the document is a statement of ambition, over a statutory document (hence its position as a material consideration, over an adopted policy). Overall, the document reflects the Government's support for a Garden City at Ebbsfleet and EDC's intent to deliver housing and employment growth in the area.

EDC Design Guidance

- 4.16 The application has taken into consideration the design guidance set out by the EDC and embedded its principles into its proposals. EDC's design guidance is as follows:
- Ebbsfleet Implementation Framework
 - Design for Ebbsfleet Guide
 - Ebbsfleet Sustainable Travel Strategy

5. Planning Assessment

- 5.1 This section of the Planning Statement provides justification in support of the planning and design issues that arise from full planning application for the proposals with reference to the planning policy framework set out in the previous section and the parameters approved for the wider site as part of the outline planning permission.

Principle of Development

- 5.2 The general thrust of national, regional and local planning policy is to secure sustainable patterns of development and regeneration through the efficient re-use of previously developed urban land, and through concentrating development in accessible locations. This is encapsulated in the presumption in favour of sustainable development set out in the NPPF, which states that proposals which accord with the development plan should be approved without delay.
- 5.3 The proposals comprise the erection of a workshop – Use Class E(g)(iii) – with associated hardstanding, car and delivery parking, landscaping and associated infrastructure to the parcel of land at Factory Road.
- 5.4 Core Strategy Policy CS03 identifies the site's location within the Northfleet Embankment and Swanscombe Peninsula East Opportunity Area for major riverside regeneration. Policy CS03 reflects the broad mix and quantum of development approved in the outline planning permission. While the site is specifically located in the Old Northfleet Residential Extension Key Site, the Northfleet Cement Works Regeneration Area Key Site was designated for 46,000sqm gross new employment, including B1 use. Policy CS03 states that development across all the key sites will lead to the provision of around 980 dwellings and around 133,500 sqm of gross employment floorspace. The proposed development at the site is therefore in accordance with Policy CS03.
- 5.5 The application site is also identified as being within one of the EDC's strategic development sites, namely Northfleet Riverside. A key aspiration of the EDC for Northfleet Riverside is that it would re-connect the existing communities with the River Thames and provide a range of high quality housing, jobs and recreational places.
- 5.6 The outline planning permission granted in June 2018 establishes the broad principles of redevelopment across the wider site for up to 532 dwellings and 46,000sqm of employment floorspace. The principle of commercial development at the application site is therefore considered to be acceptable.
- 5.7 Policy CS07: *Economy, Employment and Skills* provides information on employment uses in the authority and how applications relating to employment uses will be determined. It stipulates that in conjunction with the private sector and its regeneration partners, the Council will seek to secure the delivery of around 186,490sqm gross new employment floorspace over the plan period focusing on the following: office, industrial and warehousing facilities on Key Sites in the Swanscombe Peninsula and Northfleet Embankment Opportunity Area.

5.8 Policy CS07 also states:

'Development resulting in the loss of B class employment floorspace will not be supported unless otherwise allowed for by policies set out in the Core Strategy or where:

- the proposal will deliver at least an equivalent number of new jobs on-site or elsewhere within the Borough and the proposed use is consistent with other policies set out in this plan; or*
- the existing premises are no longer suited for employment purposes or are incapable of being made suitable at reasonable cost and it has been shown that there is no demand for them through an appropriate marketing exercise carried out in accordance with Council guidance (Appendix 5); or*
- the existing premises have an unacceptable environmental impact on the area within which they are situated and this is incapable of reasonable mitigation or the environmental benefit that would arise from the existing use stopping would outweigh the potential loss in employment.'*

5.9 For the avoidance of doubt, given the age of the Core Strategy, the workshop which now falls under Land Use Class E (g) (iii) would have previously fallen under land use class B1 (light industry appropriate in a residential area) meaning that the above policy is relevant to the proposals.

5.10 The proposal has the opportunity to provide a workshop that could benefit the relocation of an existing employment use at Abacus Corner. The principle of a workshop / industrial unit at this location on Factory Road is not new with both contemporary and historic evidence of employment uses on the site. This former use of the land further confirms the inherent suitability of employment uses at this location. Therefore, it is considered that the relocation accords with Policy CS07 and is acceptable in this regard.

Design and Appearance

5.11 Policy CS19: *Development and Design Principles* seeks new development to be visually attractive, fit for purpose and locally distinctive. Development should conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anti-crime standards. The design and construction of new development should incorporate sustainable construction standards and techniques, be adaptable and be resilient to the effects of climate change.

5.12 The design of the building is detailed in the accompanying Design and Access Statement, prepared by BPTW Architects. The design is predicated on the building's requirements to be used as a workshop but has also been carefully considered to allow its integration within the existing residential context; the materiality of the building compliments the neighbouring buildings, which were traditionally yellow. Furthermore, its massing, layout and scale are proportionate to the existing built context whilst still allowing its operation as a workshop; additionally, the design and materials are cohesive with the outline application. Due consideration has been

given to functional design of the building and incorporation of suitable landscaping to support good design and placemaking at this location.

- 5.13 The layout considers the amenity of the surrounding residents, particularly 51 Factory Road: there is no window overlooking the garden, the rear building line is continued, parking is screened by boundary treatment and the building is set back to ensure light can access their smaller windows.
- 5.14 The workshop makes an efficient use of the site and follows existing street frontage lines. Therefore, the proposed workshop responds positively to Policy CS19 and is considered acceptable in terms of design and appearance.

Drainage

- 5.15 Policy CS18: Climate Change states that (5.14.40) the Council will seek to minimise the impact of drainage from new development on waste water systems. In particular, the Council will: require that surface water run-off from all new development has, as a minimum, no greater adverse impact than the existing use; and require the use of Sustainable Drainage Systems on all developments where technically and financially feasible.
- 5.16 The submission is accompanied by a Drainage Technical Note, prepared by RLT. This concludes that the foul water will be positively discharged into the existing adopted sewer and all surface water will be contained onsite and vertically infiltrated and will not cause any adverse effect or flooding to third party properties.

Landscaping

- 5.17 Policy CS19: *Development and Design Principles* of the Gravesham Local Plan stipulates that new development will include details of appropriate hard and soft landscaping,
- 5.18 The hard and soft landscaping is illustrated in the accompanying landscape plans, prepared by LUC, and detailed in the accompanying Design and Access Statement, prepared by BPTW Architects.
- 5.19 With regards to hard landscaping, concrete pavers are used for the pedestrian entrances to the building while the parking court is surfaced in asphalt concrete. Additionally, a fence will be erected on the north and western boundaries with the existing flint wall on the street and wall against the property boundary to the south to be retained.
- 5.20 In terms of soft landscaping, a variety of shrubs have been proposed to the street frontage. The boundaries to the parking court will have a hedge to soften the boundary treatments and a single sorbus aucuparia marks the access to the parking court to the rear.
- 5.21 Overall, it is considered a high-quality landscape strategy is proposed for the site that will ensure it successfully integrates within the surrounding context and is therefore considered wholly acceptable and in accordance with Policy CS19.

Noise

- 5.22 Policy CS19: *Development and Design Principles* of the Gravesham Local Plan stipulates that new development will be located, designed and constructed to ‘safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land; avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution, and land contamination.’
- 5.23 A Noise Impact Assessment, prepared by Stantec, accompanies this application. This assessment concludes that the noise impact associated with the operation of the proposed facility is considered to be low, based on the LOAEL and SOAEL values and associated planning policy guidance.
- 5.24 As part of the assessment, an environmental sound survey has been completed to establish the existing environmental sound levels at positions considered representative of the nearest noise sensitive receptors to the proposed development site. An assessment of noise associated with the proposed workshop and its associated deliveries indicated that the development is likely to have a low or less than adverse impact on the identified noise-sensitive receptors.
- 5.25 The development is therefore considered to be wholly acceptable in noise terms and in accordance with Policy CS19.

Transport and Parking

- 5.26 Policy CS11: *Transport* of the Gravesham Local Plan sets out that new developments should mitigate their impact on the highway and public transport networks as required. As appropriate, transport details should be provided to support the delivery of travel choice and sustainable opportunities for travel. Transport assessment work is required to be undertaken in accordance with national and local policy guidance, and to identify detailed highway and public transport network requirements and management arising from the development.
- 5.27 Policy CS11 also sets out that sufficient parking in new developments is to be provided in accordance with adopted parking standards which will reflect the availability of alternative means of transport and accessibility to services and facilities.
- 5.28 The Ebbsfleet Sustainable Travel Strategy sets out that commercial developments are expected to be located within comprehensively master planned mixed-use neighbourhoods and sites across Ebbsfleet, which provides an opportunity to consider parking provision at a neighbourhood level, and to potentially share parking provision across multiple users and uses.
- 5.29 The accompanying Transport Note, prepared by Stantec, details the transport impact of the proposals. With regard to Kent County Council’s Parking Standards, the proposals overprovide on car parking with a total of 5 parking spaces. These will be solely for the use of employees and visitors to the workshop while the spaces at the front will accommodate disabled visitors and future EV charging. Vehicle movements associated with

the use are expected to be low and with the dedicated parking spaces, therefore the Workshop would not cause pressure to on-street parking at Factory Road. Furthermore, 2 cycle parking spaces will be provided, in line with the adopted standards.

- 5.30 Additionally, waste materials from the site are stored in either metal barrels or a small storage area, and collected approximately once a month via a van. The vehicle will be required to reverse into the site access road and drive outwards. The van movement is accommodated for in the site design and existing road layout.
- 5.31 The proposed vehicle movements, parking, access and servicing arrangements are accommodated for within the existing road network and proposed design. As such, the proposals are considered to accord with the relevant national and local level requirements and are therefore wholly acceptable from a transport perspective.

Ecology and Biodiversity Net Gain

- 5.32 Paragraph 187 of the NPPF states that planning policies and decisions should contribute to and enhance the natural and local environment by (d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.
- 5.33 Paragraph 192 highlights the importance of protecting and enhancing biodiversity and geodiversity by safeguarding local wildlife rich habitats and wider ecological networks; and promote the conservation, restoration and enhancement of habitats, ecological networks and the protection of species.
- 5.34 In England, Biodiversity Net Gain (BNG) is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Developers must deliver a BNG of 10%. This means a development will result in more or better quality natural habitat than there was before development.
- 5.35 The EDC Sustainable Performance Framework (2023) sets out Ebbsfleet's strategic priority for natural environment, seeking to achieve net positive species impact by 2035.
- 5.36 Policy CS12 Green Infrastructure states that (5.7.23) sites designated for their biodiversity value will be protected, with the highest level of protection given to internationally designated Special Protection Areas, Special Areas of Conservation and Ramsar sites, followed by nationally designated Sites of Special Scientific Interest, followed by Local Wildlife Sites and then by other areas of more local importance for biodiversity. Also, (5.7.24) there will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought, in particular within the Biodiversity Opportunity Areas shown on the Strategic Green Infrastructure Network map and within new development.
- 5.37 The supporting sub-text (5.7.13) states that the strategy is to ensure that there is no net loss of biodiversity in the Borough and to take every opportunity to improve biodiversity.

- 5.38 A Preliminary Ecological Appraisal, prepared by AAE, accompanies this application. This concludes that there are no habitats of international, national, county or local importance that would be directly affected by the proposals. The site is of overall limited ecological value, with the species recorded described as common or abundant and are found in similar places across much of Britain, with no evidence of protected species recorded.
- 5.39 A Biodiversity Net Gain Assessment, prepared by AAE, also accompanies this application. The assessment has resulted in an overall net gain of 0.0334 habitat units, the equivalent increase of 17.61% and an overall net gain of 0.0454 hedgerow units.
- 5.40 In addition, new habitats will be created and managed sensitively for wildlife along with other enhancement measures such as the provision of wildlife boxes, which are not factored in on the DEFRA Metric, will provide additional opportunities and benefits for local wildlife.
- 5.41 On the basis of the above, the proposals are therefore considered to accord with the relevant national and local level requirements and are therefore wholly acceptable with regards to ecology and biodiversity net gain.

Utilities

- 5.42 Policy CS10: Physical and Social Infrastructure states that all new development should make the most efficient use of new and existing infrastructure.
- 5.43 A Utilities Technical Note, prepared by Stantec, accompanies this application. This report concludes that the information gathered from the incumbent utility providers' asset records and publicly available data suggests that the proposed development could likely be served by the existing infrastructure located adjacent to the site in Factory Road.

6. Conclusion

6.1 This Planning Statement has been prepared on behalf of Bellway Homes Limited (Thames Gateway) ('the applicant') in support of a Full Planning Application ('FUL') to be submitted to Ebbsfleet Development Corporation (EDC).

6.2 The application seeks permission for the following

Full planning application for the erection of a workshop (Use Class E(g)(iii)), access, parking, and associated landscaping.

6.3 The site is located in the Northfleet Embankment and Swanscombe Peninsula East Opportunity Area for major riverside regeneration; the Northfleet Cement Works Regeneration Area Key Site was designated for 46,000sqm gross new employment, including B1 use (now Use Class E (g)(iii)). This proposal will contribute 149.9 sqm of purpose-built E (g)(iii) floorspace.

6.4 The proposals will provide a wide range of planning benefits for the site and surrounding area, as set out below:

- Contributing to the effective delivery of new purpose-built employment floorspace in a suitable location.
- Supporting a demonstrable need for high quality open storage floorspace in the area, supporting the local economy in regard to market demands and job creation.
- Maximising the development potential of a previously developed site, located within a sustainable and accessible location.
- Significant ecological enhancements will ensure that the proposals will ensure that a minimum 10% Biodiversity Net Gain is achieved on-site.

6.5 The application is supported by a full suite of technical reports which demonstrate that there are no technical reasons as to why planning permission should not be granted. This Planning Statement has assessed the material considerations arising from the proposals against the prevailing planning policy framework and has demonstrated that the scheme complies with the relevant national, regional and local planning policy guidance. Therefore, it is respectfully requested that the proposals are approved.

