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**GSP PROJECT REF: [3642.PN](#)**

**PLANNING, DESIGN AND ACCESS STATEMENT**

**ORCHARD HOUSE, SPRINGHEAD ENTERPRISE PARK, GRAVESEND,  
DA11 8HN**

**DECEMBER 2022**

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## **APPLICATION DOCUMENTATION**

- Planning, Design and Access Statement (GSP)**

## 1.0 INTRODUCTION

- 1.1 This Planning, Design and Access Statement has been prepared on behalf of Storefast Ltd in support of an application for the following proposed development:

*Erection of detached warehouse*

- 1.2 Land Registry records suggest that the following titles are affected by the proposed development. These titles are owned by the applicant:

- K573880 (described as ‘land lying to the west of Springhead Road’);
- K603310 (described as ‘unit V1-V4, Springhead Enterprise Park’, although these units are not included in the application site).

## 2.0 SITE CONTEXT

- 2.1 The site, extending to some 1.24 hectares, is located to the far north west of Springhead Enterprise Park, which forms part of a larger enterprise zone built in phases in the 1980’s and covering a total of some 11.1 hectares. It is understood that as an enterprise zone, first designated by the North West Kent Enterprise Zones (Designation) Order of 1983, no planning permission was required for the existing Orchard House building, including extensions, nor units V1-V4 (beyond the application site), and there are, as a consequence, no restrictions on its operation including within the yard. The Order confirms that the designation expired on 31<sup>st</sup> October 1993.
- 2.2 This particular part of the enterprise park is accessed via a small subsidiary road that has a junction with the main route through the park, which connects with Springhead Road (the B262) to the east. This adjoining main road connects with Thames Way to the north and then onto Ebbsfleet Gateway (the A2260) and the A2. Heavy vehicles over 7.5T cannot travel southwards along Springhead Road and beyond its junction with Springhead Park due to a weak former railway bridge.
- 2.3 The site does not comprise a statutory or locally listed building, although the Old Rectory is a grade II\* listed building that is located some 140m away to the east with no direct line of sight. The site does not lie within or near a conservation area. The site lies within Flood Zone 1, meaning it has a low probability of flooding from rivers and the sea. Although land on the north, south and west of the site is within the boundary of the Ebbsfleet Development Corporation, the entire Springhead Enterprise Park falls within Gravesham Borough Council’s boundary as planning authority.

## 3.0 PLANNING HISTORY

- 3.1 The following planning records are considered relevant:

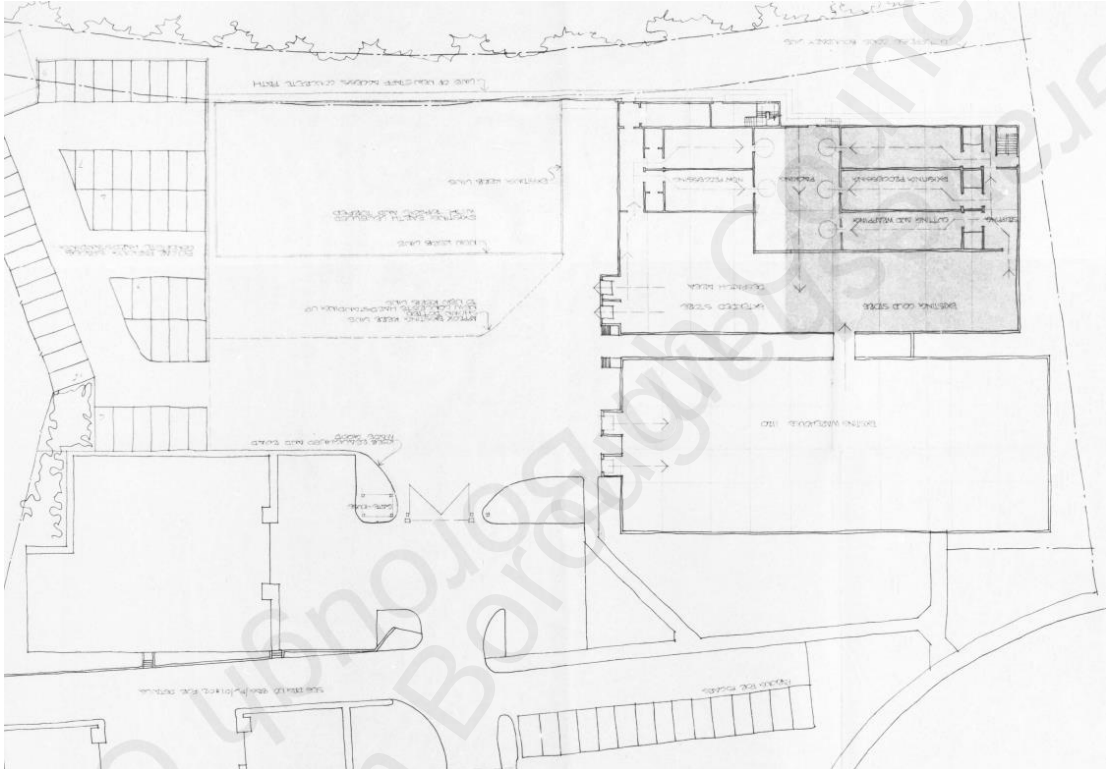
- [Section 53 determination as to whether planning permission is required for the erection of extensions to cheese processing factory including ancillary staff facilities and toilets with provision for two lorry and 20 car parking spaces](#)

Ref. No: 19860085 | Status: Planning permission not required. An extract from the proposed site plan is shown below, showing an extension to the north of what is now known as Orchard House:



- Section 53 Determination as to whether planning permission is required for erection of two storey extension to form enlarged cool store, packaging area and locker room with enlarged coal store and enlarged store over.

Ref. No: 19880140 | Status: Planning permission not required. This involved an extension to the western side of the existing cold store, towards the NE corner of the site, as shown in the extracted site plan below:



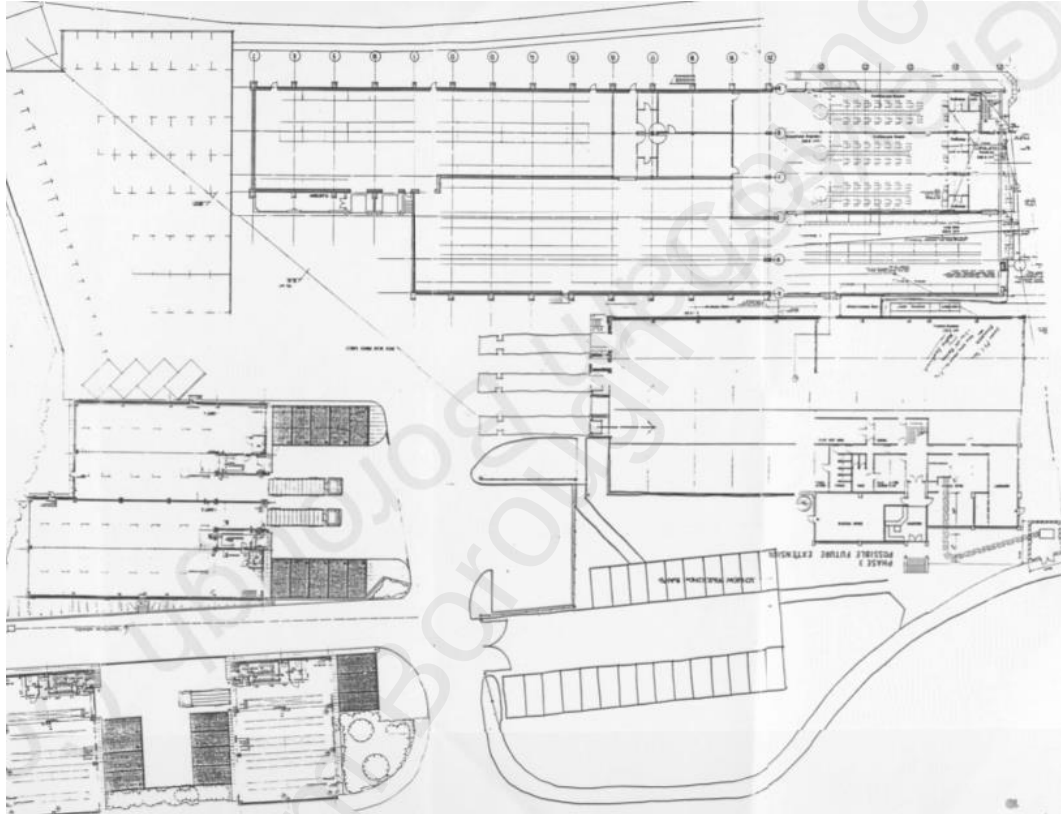
- [Section 53 Determination as to whether planning permission is required for erection of 4 no warehouse/industrial units and formation of 21 car parking spaces with ancillary lorry parking spaces](#)

Ref. No: 19880141 | Status: Planning permission not required. These formed units V1-V4 as shown on the extracted approved site plan below:



- [Section 53 determination.](#)

Ref. No: 19881168 | Status: Planning permission not required. This related to the erection of two storey extensions to the western side elevation of the existing cold store building. The plans incorporated revisions to the car park and provision of additional car parking. An extract from plan 890-PL-103 Revision B is included below. It is understood that this permission was not implemented.



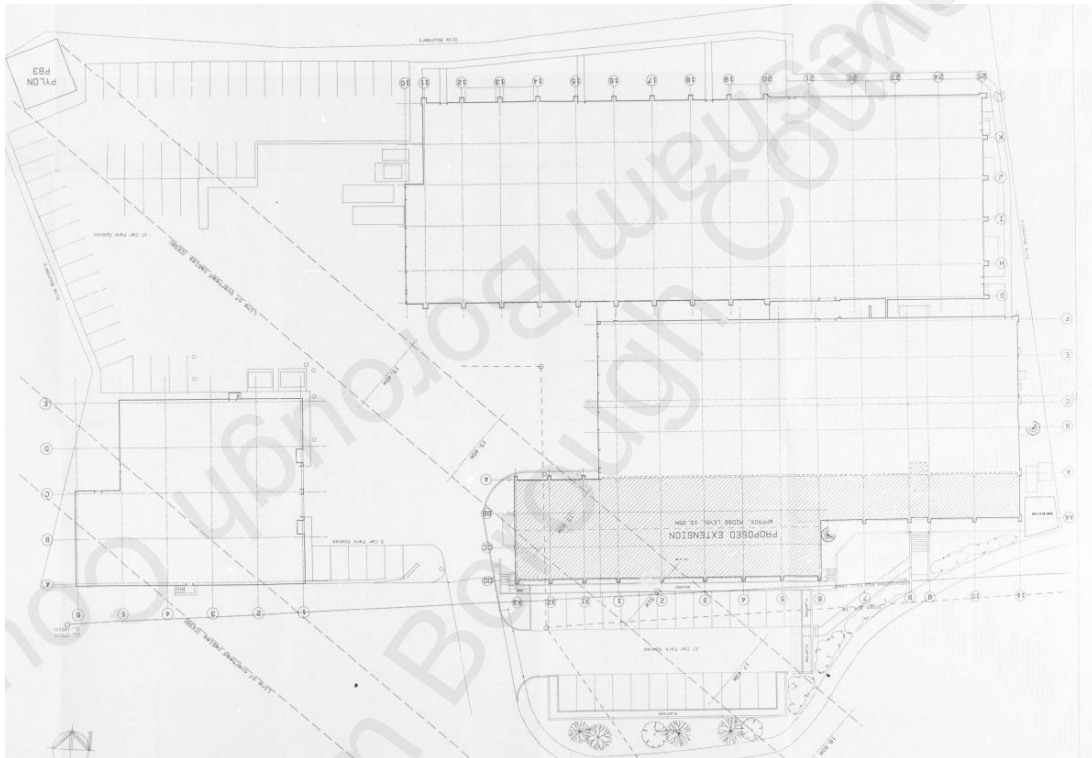
- [Circular 34/76 Consultation for the erection of outdoor sub-station.](#)

Ref. No: 19881224 | Status: Application Permitted. Located towards the far SE corner of the site with direct access to the south. Later enlarged via [19980146](#):



▪ [SECTION 64 Determination for erection of extension to cheese processing factory with ancillary two storey office extension.](#)

Ref. No: 19910819 | Status: Planning permission not required. This related to an extension to the southern side of what is now known as Orchard House. An extract from the proposed site plan is included below. The extension was constructed, whilst the additional car parking that formed part of 19881168 was enlarged.



#### 4.0 PROPOSED DEVELOPMENT

- 4.1 The proposal is for a detached warehouse building to be located towards the far NW corner of the site that will result in around a 10% uplift in warehouse floorspace based on the floorspace that exists within the application site.
- 4.2 The new storage building will have a footprint of 429 sqm and a GIA of 404 sqm. The building comprises two external shutters and level loading bays with two pedestrian accesses and internal WC. Rooflights are provided within the grey metal profiled roofing that will have a maximum ridge height of 9.2m. The building is intended to be a steel portal frame structure. The form and materials have been developed to mirror the design merits of the nearby units with a curved roof and eaves height of 6.4m. The bottom half of the walls will be red facing brickwork and the top half will comprise black metal horizontal cladding profile.
- 4.3 The rationale behind the proposal is to provide a freezer store on site for Storefast to avoid having to transport and store frozen goods off site. The layout seeks to

maximise the use of this NW part of the wider site and takes account of tracking that has been produced to check that the largest vehicles that are likely to use both the existing and proposed buildings can still do so even with this additional building in situ.

## **5.0 PLANNING POLICY**

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 require that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The Court of Appeal has clarified that for a decision maker this means establishing whether a proposal is in accordance with the development plan as a whole. The question of compliance with one policy should not dictate the outcome of a proposal in the absence of considering compliance with all other relevant policies. Decision makers are therefore tasked with identifying and understanding all relevant policies and material considerations in order to reach a properly informed planning judgment on a proposal, and to avoid an irrational or vulnerable decision that may be subject to criticism in a public law challenge.
- 5.2 Paragraph 2 of the National Planning Policy Framework ('the Framework') reiterates this, whilst paragraph 12 of the Framework is clear that the development plan is the starting point for decision making. Proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise.
- 5.3 Paragraph 38 of the Framework encourages local planning authorities to approach decisions on proposed development in a positive and creative way. It also encourages working proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area, adding that decision-makers should seek to approve applications for sustainable development where possible.
- 5.4 Annex 1 of the Framework confirms that for the purposes of decision-taking, the policies in the plan should not be considered out-of-date simply because they were adopted prior to the publication of the Framework. It adds that due weight should be given to relevant policies in existing plans according to their degree of consistency with the Framework, with greater weight being given to those policies that are closer to the policies in the Framework.

### **Development Plan**

- 5.5 In terms of the Development Plan for the Gravesham Borough Council (GBC), this comprises of the following documents that are relevant to this application:
- The Gravesham Local Plan Core Strategy (CS) adopted September 2014;
  - Remaining saved policies of the Local Plan First Review (LPR) adopted 1994.
- 5.6 The following policies in the CS are considered relevant to this application:

- CS01: Sustainable Development;
- CS02: Scale and Distribution of Development;
- CS05: Ebbsfleet (Gravesham) Opportunity Area;
- CS07: Economy, Employment and Skills;
- CS11: Transport;
- CS12: Green Infrastructure;
- CS18: Climate change;
- CS19: Development and Design Principles.

5.7 The following policies in the LPR are considered relevant to this application:

- T1: Impact of development on highway network;
- P3: Vehicle parking standards.

### **Other Material Considerations**

- 5.8 Section 6 of the National Planning Policy Framework (the Framework) relates to building a strong, competitive economy. Paragraph 80 encourages decisions to allow for businesses to invest, expand and adapt adding that 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.
- 5.9 Section 11 seeks to make effective use of land. Paragraph 119 seeks to ensure that decisions promote an effective use of land in meeting for need for homes and other uses, while safeguarding and improving the environment. Paragraph 120 requires decisions to give substantial weight to the value of using suitable brownfield land and seeks to promote and support the development of under-utilised land and buildings.
- 5.10 Section 12 of the Framework seeks to achieve well-designed places beginning with the point that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Paragraph 126 continues by expressing that good design is a key aspect of sustainable development, creating better places in which to live and work. Paragraph 130 says that decisions should ensure that developments function well and add to the quality of the area as well as being visually attractive and sympathetic to local character.
- 5.11 The following additional documents are material considerations:
- National Design Guide (NPG);
  - National Planning Practice Guidance (NPPG).

## **6.0 PLANNING ASSESSMENT**

- 6.1 Given the above policy and material considerations it is considered that the key planning issues relevant to this application are as follows:
- Principle of the development;

- Character and appearance;
- Impact on the local highway network;
- Parking provision.
- Living conditions;
- Other issues.

### **Principle of the Development**

- 6.2 The site forms part of a well-established and long-standing employment site dating back to the 1980s. As part of the Ebbsfleet (Gravesham) Opportunity Area, policy CS06 of the CS is relevant. The policy notes that the Springhead Enterprise Park's employment use shall be retained and support will be given to proposals which increase its employment potential and make it more responsive to the market.
- 6.3 The site is currently used for open storage that is not the subject of any specific restrictive planning conditions. The applicant's wish is to accommodate this storage within a warehouse building, as well as accommodate additional storage. Approving this development would safeguard Storefast's presence at Springhead Enterprise Park by providing a more secure place to store goods, as well as providing a minor uplift in the number of employees in order to accommodate and work within the extra storage space generated by the proposed warehouse building that exceeds the footprint of the existing outdoor storage area. The government's Employment Density Guide 2015 suggests that for the floor area proposed, based on a B8 use, a total of 5 people could be employed here on a full-time basis (based on a density of one job per 77 sqm GIA).
- 6.4 The principle of adding commercial floorspace in this location should therefore be supported as it would evidently be beneficial to the local economy and provide employment opportunities, in full accordance with policy CS06.

### **Character and Appearance**

- 6.5 Policy CS19 requires visually attractive developments that are fit for purpose and locally distinctive. The design, scale and external materials of the proposed warehouse building will be in keeping with the existing Enterprise Park. The siting of the proposed building will be on the lowest part of the site towards the far NW corner. This will ensure that its peak height will not appear dominant within the employment area and certainly not from the nearest public highway, which is Thames Road to the north. Dense, mature trees and planting exist between the site and this highway that will ensure that, even in the winter months, views of the proposed building will be limited.
- 6.6 The Council can be satisfied that this proposed warehouse would be appropriate in design and would not detract from the character of the application site nor the surrounding area. As such, the development is acceptable in design terms. The issue of parking and amenity (matters also covered in policy CS19) are dealt with separately below.

### **Impact on Local Highway Network**

- 6.7 The site is already in B8 use, hence there will be no material change of use of the land as a result of this application being approved. Stock that is currently stored externally will, as a result of the new building, be stored inside. The warehouse will remain occupied by the same tenants as the current site and no changes will be made to their operating procedures, including the number of traffic movements associated with the site. The accompanying transport statement explains this in more detail, however, the Council can be satisfied that there will be no material change to the amount of traffic associated with the ongoing storage and distribution use of the site.

### **Parking**

- 6.8 As a result of the site being part of an Enterprise Park until 1993, there are no planning conditions that control or retain parking spaces that would otherwise normally be the case. At the present time there are a total of 6 loading bays serving Orchard House. The erection of the proposed warehouse will not disrupt use of these loading bays, given the siting of the new building. Tracking diagrams confirm this to be the case.
- 6.9 The new building will require two additional loading bays, and again, tracking diagrams confirm that there is no conflict between the location of the bays, turning areas and parking spaces. Visitor and staff car parking for up to 26 vehicles exists closer to the site entrance. The Council's adopted policy relating to parking (P3) defers to the County parking standards. These are understood to be Supplementary Planning Guidance 4, first published in July 2006. These state that for a B8 use 1 car parking space per 110m<sup>2</sup> should be provided.
- 6.10 Approximately 3880m<sup>2</sup> of B8 floorspace currently exists within the site. This particular application therefore presents an opportunity to retain, by condition for the first time, the parking that already exists. It is also argued, that given the site circumstances, any issues with parking overspill will be contained within the Enterprise Park itself, particularly given that the site is about 280m away from Springhead Road to the east and the Enterprise Park's access road does not contain any parking controls.
- 6.11 Ultimately, the Council should limit their consideration of parking to whether the development is likely to result in any overspill onto the public highway, which the applicant says will not be the case given the above factors.

### **Living Conditions**

- 6.12 The subject part of the Enterprise Park is the furthest from any residential dwellings, with the nearest being about 270m away to the east on the junction between Thames Way and Springhead Road or Springhead Park which lies about 300m to the south. That said, because of the unconditioned nature of the lawful use of the site, the fact that the external operations of loading, storing and manoeuvring of stock will be transferred to inside a building means that the application presents an opportunity to

improve the living conditions of residents nearby. Overall, it is considered that the proposal will not result in a conflict with policy CS19 on amenity grounds.

### **Other Matters**

- 6.13 It is unclear from any online documentation as to whether the site is within Area of Archaeological Potential. If this is the case, then the applicant is committed to securing and submitting an Archaeological Desk-Based Assessment as part of the application. It is hoped that this, coupled with suitably worded reasonable conditions can satisfy the County's archaeological officer who is expected to be consulted on the application should the site be within an Area of Archaeological Potential. In any case, the ground has already been disturbed through the laying of the hardstanding across the entire site where the warehouse is proposed to be erected.
- 6.14 The application site is understood to be located within Groundwater Source Protection Zone 1. It is, however, expected that the Environmental Agency will find that the proposal represents a low risk to the protection zone or that suitably worded conditions can address any ongoing concerns.
- 6.15 The application site is also understood to be located within a Biodiversity Opportunity Area. However, the site is almost entirely hard surfaced with planting limited to the perimeter, but beyond the application site. As such, the proposed development will not lead to a reduction in the level of existing planting and hence there will be no adverse biodiversity impacts and no conflict with policy CS12 can be evidenced.

## **7.0 CONCLUSIONS**

- 7.1 The subject site has a long-standing lawful use for production, storage and distribution (mixed B2/B8 use) within a previously designated Enterprise Park. The application presents an opportunity to provide additional employment opportunities. As the site is entirely previously developed land, the principle of the development should be considered acceptable within this designated employment site that will result in a more effective use of the site.
- 7.2 The details of the scheme are also considered to be acceptable, adding a modest 10% to the covered warehouse floorspace within the site and providing a built form that responds to the character and appearance of the existing built form nearby. Whilst there is a parking shortfall, it is a material consideration that no controls are currently in place that retain the demarcation of any parking spaces at the present time. The site is also sufficiently separated from any noise sensitive properties, notwithstanding the fact that the intention is to enclose operations that currently occur externally.
- 7.3 In conclusion, the proposal comprises sustainable development that accords with the policies of the Development Plan and relevant material considerations. As such, in accordance with paragraphs 11 and 38 of the Framework, this application should be viewed positively by the authority and it is respectfully requested that this submission is approved.