



Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

Our ref: JB/GF/30161
09 January 2023

Dear Sir/Madam,

**APPLICATION FOR FULL PLANNING PERMISSION
LAND ADJACENT TO UNIT 14, EBBSFLEET BUSINESS PARK, NORTHFLEET, KENT, DA11
9DZ.**

On behalf of our client Ace Filtration Pension Fund ("the Applicant") we are applying for full planning permission for an extension to Unit 14, Ebbsfleet Business Park, Northfleet, Kent. The application is described as such:

"Two storey side extension comprising of a new customer area and storage area".

It is noted that the proposals contained within this application are almost identical to that of the previously approved scheme (application reference: 20040660), which sought the erection of a side extension to Unit 14 with a mezzanine floor, this is described in greater detail throughout the statement.

I can confirm that the correct application fee of £266.20 has been sent to the Council via the Planning Portal.

Application Documents

This planning statement is intended to be read in conjunction with the following suite of documents:

Document Title	Reference	Author
Application Forms		DHA Planning
Planning Statement	JB/GF/30161	DHA Planning
Site Location Plan	DHA/30108/01	DHA Planning
Existing Site Layout Plan	DHA/30108/02	DHA Planning
Google Earth Image Plan	DHA/30108/03	DHA Planning
Unit 14 Ground & First Floor Plans	DHA/30108/04	DHA Planning
Unit 14 Existing Elevations	DHA/30108/05	DHA Planning
Proposed Site Layout Plan	DHA/30108/10	DHA Planning

planning transport design environment infrastructure land

t. 01622 776226 e. info@dhaplanning.co.uk w. www.dhaplanning.co.uk

Maidstone Office, Eclipse House, Eclipse Park, Sittingbourne Road, Maidstone, Kent, ME14 3EN

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Unit 14 Proposed Floor Plans	DHA/30108/11	DHA Planning
Unit 14 Proposed Elevations & Typical Building Cross Section	DHA/30108/	DHA Planning
Flood Risk Assessment		DHA Planning

Application Site and Surroundings

The site currently comprises of the existing two-storey warehouse of Unit 14, Ebbsfleet Business Park, and adjacent plot of maintained grass to the northwest of Unit 14. The building itself is generally industrial / utilitarian in form and appearance. The site has remained largely unaltered since its erection in the later 1980's.



Figure 1: Application site (Edged in red) (Courtesy of Google Earth).

Industrial development bounds the site on all sides. Beyond this lies Ebbsfleet United Football Club to the north and residential development to the east and west.

As defined by the Council's Core Strategy Policies Map, the site lies within the Northfleet Embankment & Swanscombe Peninsula East opportunity area but is otherwise 'white land' is not the subject of any specific planning constraints or designations. The site bounds a piece of land that is designated as High Speed 1 Safeguarding.

The site is excluded from any of the surrounding Green Belt Land and is also not the subject of any heritage or conservation designations, with no listed buildings within the vicinity of the site, or the site being within or adjacent to any conservation area.

The entirety of the site is located within Flood Zone 3 and has a high probability of flooding, although the area benefits from flood defences the application is required to include a Flood Risk Assessment (FRA).

With reference to Annex 3 of the National Planning Policy Framework (NPPF), the site is classified as being 'less vulnerable' as a building that is used for services and general industry. We highlight that National Planning Policy Guidance notes that a sequential test is not required for development that is minor development

Site Accessibility

Ebbsfleet Business Park is accessed through a primary distributor road, the A226 (Stonebridge Road). By car, the site is located approximately 1.8 miles off the A2 (Watling Street) and approximately 4 miles from Junction 1a of the A282.

The nearest bus stop, 'Ebbsfleet Football Ground', is located adjacent to Ebbsfleet Football Ground, approximately 150 metres north of the proposed development. From this stop the 480 Sapphire, 490 Sapphire, AZ Fastrack, B Fastrack, 3, 34, and 306 are accessed.

Northfleet Railway Station lies approximately 400 metres, by foot, southwest of the site. From the station, Thameslink and southeastern services are accessible, which provide a connection to Luton, Rainham, Gravesend and Charing Cross via Sidcup.

Planning History

According to Gravesham Borough Council's online planning application database, the site has been the subject several previous planning applications:

Reference	Proposal	Decision
19750765	Erection of a single storey builders merchants warehouse with ancillary offices	Granted Permission January 1976.
19780253	Outline application for the development of land for retail and wholesale sales storage and associated parking	Refused Permission June 1978.
19860068	Erection of 5 industrial units with ancillary office store reception and staff facilities and layout of car parking provision for 52 spaces	Granted Permission April 1986.
19860958	Erection of 11 no industrial units with ancillary offices and layout of parking provision for 48 cars and two lorries	Granted Permission January 1987.
20040660	Erection of side extension to unit with mezzanine floor.	Granted Permission September 2004.
20220852	Request for Scoping Opinion pursuant to Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in respect of a proposed outline planning application with all matters reserved, except for means of access, for a mixed-use redevelopment involving the demolition of existing buildings and structures including site preparation/remediation works, and the development of up to 3,500 residential units (Use Class C3), up to 55,000 sq.m (GEA) of Use Class E including up to 32,000 sq.m (GEA) floorspace for retail, food, and beverages and up to 18,000 sqm (GEA) office floorspace, up to 15,000 sq.m (GEA) floorspace for a new 8,000-seater football stadium with associated business and leisure facilities, up to 20,000 sq.m (GEA) floorspace for a hotel (Use Class C1), up to 4,000 sq.m (GEA) floorspace for community uses (Use Class F), delivery of circa 3.8 hectares of	Observations Sent September 2022.

	open space and the realignment of the A226 Galley Hill Road / Stonebridge Road. Redevelopment of the site will also include some sui generis uses, with hard/soft landscaping, car and cycle parking, highways works, infrastructure provisions with ancillary works.	
20221064	Outline planning application with all matters reserved, except for the primary means of access and road layout, for a phased mixed-use redevelopment involving the demolition of existing buildings and structures including site preparation / remediation works, and the development of residential units (Use Class C3), Class E uses including floorspace for retail Class E(a)), food/beverage and drinking establishments (Use Class E(b)), local services (Use Class E(c)), indoor sport/recreation/fitness (use Class E(d)), healthcare space (Use Class E(e)), creche/nursery uses (Use Class E(f)), office floorspace (Use Class E(g)(i)), a new multi-use stadium with associated business and leisure facilities (sui generis), hotel (Use Class C1), community uses floorspace (Use Class F2). The phased redevelopment will include other sui generis uses, delivery of open space and significant realignment of the road network including the A226 Galley Hill Road / Stonebridge Road / Lower Road with hard / soft landscaping, car and cycle parking provisions, infrastructure works, ancillary and associated works.	Awaiting Decision as of November 2022.

As highlighted previously, this application comprises of an almost identical proposal to that of the 2004 permission (application reference: 20040660). This is covered in detail in the 'planning appraisal' section of this letter.

Proposed Development

As highlighted above, this proposal seeks the two storey side extension of Unit 14 of Ebbsfleet Business Park, which will provide additional storage space on the first and second floors and a customer service lobby on ground floor for existing and future tenants.

As seen in Figure 2 overleaf, the extension will see the existing Gross Internal Area (GIA) increase from 226sqm to 260sqm, an increase of 134sqm, which will be split evenly between the ground floor and first floor with each floor providing an additional 67sqm of floorspace for the business.

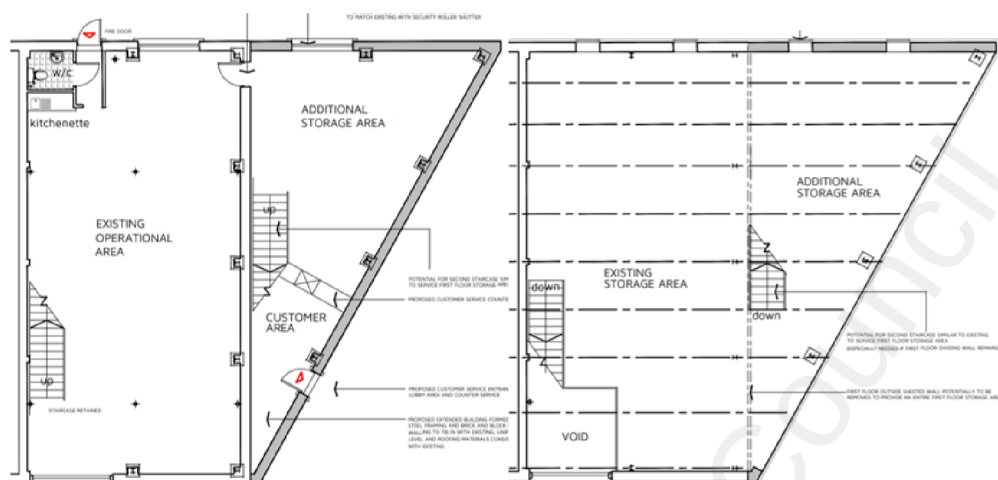


Figure 2: Proposed Ground Floor and Mezzanine Floor

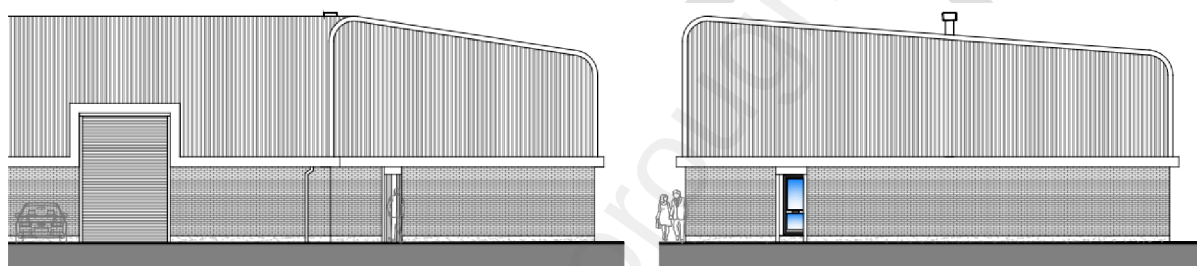


Figure 3: Proposed Front and Side Elevations

Figure 3 above shows the proposed external appearance of the extension, the materials used in the extension will reflect that of the existing units. With block plinth wall in red stock and profiled uPVC plastisol sheet cladding on the walls and roof to match the existing. Projecting trim, doors, windows, guttering, and downpipes will also match that of the existing building. A side entrance if proposed to the formalised customer service area, ensuring customers stop using the fire door for drop offs and collections.

Planning Policy

Statutory Framework

Under the provisions of Section 38 (6) of the Planning and Compulsory Purchase Act 2004, applications for planning permission are required to be determined in accordance with the provisions of the Development Plan in force unless material considerations indicate otherwise.

Relevant Planning Considerations

The adopted Local Plan Core Strategy (2014) should be read alongside the Local Plan First Review Saved Policies (2007). These are supported by Supplementary Planning Documents (SPDs) which give specific guidance on how the council's planning strategy and policies will be implemented for specific areas or site. The National Planning Policy Framework (2021) is also prevalent.

Local Plan Core Strategy (2014)

- **Policy CS01:** Sustainable Development.
- **Policy CS02:** Scale and Distribution of Development.
- **Policy CS03:** Northfleet Embankment and Swanscombe Peninsula East Opportunity Area
- **Policy CS07:** Economy, Employment and Skills.
- **Policy CS11:** Transport.
- **Policy CS19:** Development and Design Principles.

Local Plan First Review Saved Policies (2007)

- **Policy EO:** General Employment Policy.
- **Policy E1:** Existing Industrial Areas.

National Planning Policy Framework (2021)

- **Paragraph 81** states 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.
- **Paragraph 83** notes that planning policies and decisions should recognise and address the specific locational requirements of different sectors, including storage and distribution operations at a variety of scales and in suitably accessible locations.
- **Paragraph 111** is clear that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Planning Appraisal

When assessing the planning proposals against the relevant policies of the Gravesham Borough Council development plan, as well as the National Planning Policy Framework, it is considered that the key topics of discussion are:

- Principle of Development;
- Previous Application;
- Flood Risk;
- Design and Appearance;
- Highways and Transport Considerations; and

- Community Infrastructure Levy.

Principle of Development

Ace Filtration Pension Fund owns Units 1, 13, 14, and the triangular shaped land parcel adjacent to Unit 14 on Ebbsfleet Business Park. The proposed development would increase the floorspace available to their current and future tenants, providing them with additional storage space and a formalised customer reception area for drop offs and collections. As existing, customers that wish to drop off or collect prints have to make use of the rear fire door when the roller shutters are closed.

Paragraph 81 of the NPPF states that *"significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development"*. Paragraph 83 continues further, noting that planning policies and decisions *"should recognise and address the specific locational requirements of different sectors in suitably accessible locations"*.

The Local Plan Core Strategy supports development of new employment floorspaces, within Use Classes B1, B2, and B8 within the Northfleet Embankment and Swanscombe Peninsula East. The Core Strategy prioritises development in the urban area as a sustainable location for development achieved through the redevelopment of underused land in the urban area. CS07 is clear that the Council will support the upgrading of existing industrial and commercial premises to facilitate flexible working practices and the changing economic needs of the Borough.

The proposals for the extension of Unit 14 will, as required by the Core Strategy, will deliver "warehousing facilities in the Swanscombe Peninsula and Northfleet Embankment Opportunity Area", it will also "improve the existing stock of employment land", making use of an "underused" parcel of land in the urban area.

The proposed extension will improve the business accommodation available on the site and this weights significantly in favour of the grant of consent.

Previous Application

As noted above, the site has been the subject of similar previous planning application in 2004. Application reference: 20040660 sought the 'erection of a side extension to unit with mezzanine floor', which was subsequently approved on 8th September 2004.

The development was never pursued and due to the significant time since the previous application, the permission has since lapsed in 2009. As per Condition 1 of the decision notice that states the development related to the permission must have begun not later than five years beginning with the date on which the permission was granted.

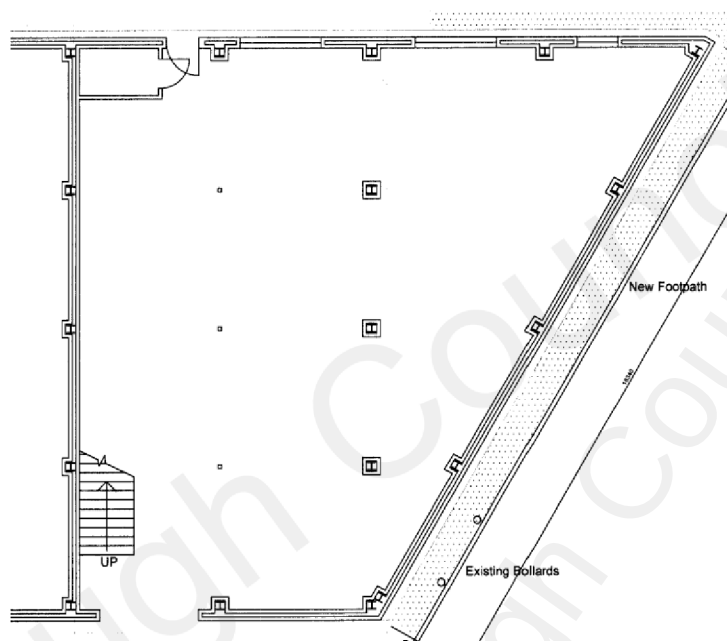


Figure 4: Ground Floor Plan of 20040660 Application

When comparing this proposal with that of the 2004 application, as seen in Figure 4 above, it is possible to see that they are largely similar. The only differences stem from minor alterations to the internal layout, which have had an equally as minor effect on the total floorspace.

Figure 5 shown below depicts the front and side elevations of the 2004 application, when compared to this proposal, externally the only difference is the addition of the customer service entrance, two small windows and a roller shutter window. Other than this, the materials and design of the extension seek to emulate that of the materials and design of the existing unit.

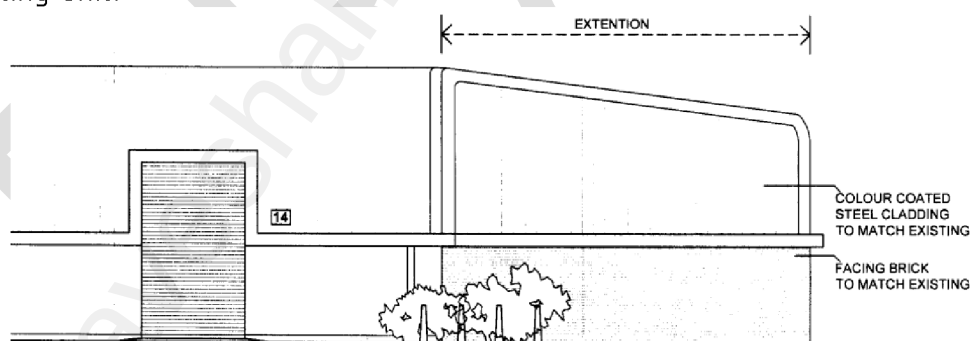


Figure 5: Front and Side Elevation of 20040660 Application

We conclude that there have been no changes to relevant policies or the proposal itself that would result in a different conclusion than that of the 2004 application being reached now.

Flood Risk

As previously noted, the site falls within Flood Zone 3, and despite benefitting from flood defences, is required by national and local policy to provide an FRA. With reference to

Annex 3 of the National Planning Policy Framework (NPPF), the site is classified as being 'less vulnerable' as a building that is used for services and general industry.

In addition to this, we highlight that National Planning Policy Guidance notes that a sequential test is not required for development that is minor development, as highlighted within the submitted FRA. In this instance, minor non-residential extensions with a floorspace not exceeding 250 sqm is considered minor development.

The submitted FRA is clear that the proposals comply with standing advice produced by the Environment Agency, by ensuring the floor levels of the extension are no lower than the existing building's flood level and that construction is from flood resilient materials.

In light of this, whilst Ordnance Survey mapping and Environment Agency flood data shows the site is located entirely within Flood Zone 3a. It is noted that the site benefits from existing flood defences, meaning the residual risk of flooding can be seen to be low.

Design and Appearance

Paragraph 130 of the NPPF is clear in terms of achieving well-design places, that planning policies and decisions should:

- a) Function well and add to the overall quality of the area, over the lifetime of the development;
- b) Visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) Sympathetic to local character and history, including the surrounding built environment and landscaping setting, whilst not presenting or discouraging appropriate innovation or change;
- d) Establish or maintain a strong sense of place;
- e) Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development, supporting local facilities and transport networks; and
- f) Create places that are safe, inclusive, and accessible, which promote health and well-being with a high standard of amenity for existing and future users.

Currently, the building appears somewhat outdated, particularly on the northern elevation, where it presents a largely unrelieved elevation. The building is generally utilitarian, reflecting its purpose and its age when the building was erected during the 1980s, as seen in Figure 6 overleaf.



Figure 6: Existing Façade

The proposed development would see the creation of a new entrance for pedestrians, leading to an internal customer service area. The addition will appear modest in scale and will bring additional interest to the building and business at Unit 14 as it is seen from the entrance of the Ebbsfleet Business Park. Existing planting on site will help 'soften up' the landscaping.

The extension, as noted above, will seek to emulate the materials used in the existing building, in accordance with NPPF Paragraph 130, this will ensure the development is sympathetic to the local character and history of an industrial estate / business park, which will also help to establish or maintain the strong sense of place of the Ebbsfleet Business Park.

As seen previously, Figure 3 shows the proposed design of the development, whereby all materials, windows, and openings used within the extension have been designed to match the existing building.

Given this, it is considered that the proposals would not have a negative visual impact, and in line with the NPPF, would in fact have a beneficial visual effect, increasing the visibility of the business within Ebbsfleet Business Park. In addition to this, it would enhance the operation of the building for the applicant, and their tenant (a local employer).

Highways and Transport Considerations

The total increase of ground floor and first floor area of the site will be increased by 134 square metres. The existing storage area will be retained to its current extent. The increased floorspace is largely occupied by an additional storage area, and small customer service area, which will be operated by the existing staff. As such, the development would not result in any expected increase in trips to and from the site, with no change in the site's parking requirement.

Although it is not envisaged that the proposals will require an increased provision of parking, ample parking is available for those accessing and making use of Ebbsfleet Business Park on the north side of the road into Ebbsfleet Business Park.

As part of the development, no changes are proposed to the vehicular or pedestrian entrance or exit points, there are therefore no changes proposed to the site access or egress arrangements. It is concluded that the development will not result in 'severe' residual impacts on the highways network as per Paragraph 111 of the National Planning Policy Framework.

Community Infrastructure Levy

Gravesham Borough Council have proposed to develop a Community Infrastructure Levy (CIL) charging schedule. As it currently stands the Council are yet to develop and adopt a CIL charging schedule and they will continue to seek funding for infrastructure requirements arising from new development through Section 106 Agreements.

Due to the minor size of the proposal, it is not considered that the application will be required to providing funding for infrastructure requirements through a Section 106 Agreement.

Closing

Overall, the extension of the building will result in tangible benefits in terms of a) the quality of the employment floorspace provided therein, and b) supporting the expansion of a small sized local enterprise. We conclude that there are no potential disbenefits to the above proposals, which will improve the existing stock of employment land within the Gravesham borough.

Given the above, we politely ask therefore that the Council positively considers and determines this application at the earliest possible opportunity.

I trust that you agree sufficient information to grant planning permission is included within this planning application. However, should you wish to discuss the contents of this application, please do not hesitate to contact me.

Yours sincerely,



Jonathan Buckwell
Director (Planning)
DHA Planning Ltd

Direct email: Jonathan.Buckwell@dhaplanning.co.uk