

DESIGN & ACCESS STATEMENT

INPOST PARCEL LOCKER, GRAVESEND RAILWAY STATION,
GRAVESEND DA11 OHP

PREPARED ON BEHALF OF
INPOST UK



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PLANNING

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1 INTRODUCTION

- 1.1 This Design & Access Statement (the 'Statement') has been prepared on behalf of InPost (the Applicant) in support of planning and listed building consent applications for the siting of an InPost parcel locker at Gravesend Railway Station, DA11 0HP.
- 1.2 This Statement should be read in conjunction with the documentation submitted in support of this application, namely:
- Planning Drawings:
 - Location Plan ref. L(00) 001 P1;
 - Existing Elevations ref. L(02) 001 P1;
 - Proposed Plans ref. L(01) 101 P1, and
 - Proposed Elevations ref. L(02) 101 P1.
 - Heritage Statement
- 1.3 This Statement sets out the design principles and concepts that have been applied to the proposal and explains the approach taken in respect of access.
- 1.4 The content of this Statement is as follows:
1. Introduction
 2. Assessment of the Site and its Context
 3. Planning Policy Context
 4. Design and Access Considerations
 5. Summary and Conclusion

2 ASSESSMENT OF THE SITE AND ITS CONTEXT

- 2.1 This section sets out the steps taken to appraise the physical context of the application site and its surroundings.

METHODOLOGY

- 2.2 A planning policy review was undertaken to understand the existing planning context for the site. An analysis of the relevant design and access considerations is then provided to assess the appropriateness of the proposal.

APPLICATION SITE

- 2.3 The InPost Locker will be located within the curtilage of Gravesend Railway Station. The locker will be positioned on a paved area of hardstanding, within a walled enclosure to east of the main station building, fronting onto Rathmore Road. As such, the locker can be accessed directly from Rathmore Road, without entering the station building.

SITE CONSTRAINTS AND DESIGNATIONS

- 2.4 Gravesend Railway Station is a Grade II Listed Building. It is not located within a conservation area.
- 2.5 The listing description for the Railway Station states as follows:

1. 5277 RATHMORE ROAD

Gravesend Railway Station (Up Side) TQ 6474 SE 1/171

II

2. Built in 1849. This consists of a central portion of 1 storey stock brick with a cornice and colonnade of 4 columns, now boxed in and 3-light sashes behind. This portion has a room with a 3-light bow window looking on to the platform. The central block is flanked by 2 2-storey stock brick pavilions with stuccoed cornices. 1 sash to each and a 3-light sash window on the ground floor, on the left-hand side incorporating a door. Each of these pavilions is in turn flanked by a recessed portion of 2 storeys stock brick with 1 sash and a round-headed doorcase with fanlight.

3 PLANNING POLICY CONTEXT

3.1 The National Planning Policy Framework (NPPF) sets out a presumption in favour of sustainable development and as such, development proposals which accord with an up-to-date development plan should be approved without delay.

3.2 In considering whether to grant Listed Building Consent, in accordance with section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the Local Planning Authority is required to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. The NPPF paragraph 199-200 notes that great weight should be given to a heritage asset's conservation and that as heritage assets are irreplaceable any harm or loss of significance should require clear and convincing justification.

3.3 The relevant documents which makes up Gravesham Brough Council's Development Plan comprise:

- Gravesham Local Plan Core Strategy (Sept 2014)
- Saved policies from Gravesham Local Plan First Review (Nov 1994, updated 2014)

[The Local Plan Core Strategy \(Sept 2014\)](#)

3.4 The following are the key relevant Local Plan policies:

3.5 Policy CS01 Sustainable Development advises that planning applications that accord with policies in the development plan will be approved without delay and the Council will take a positive approach that reflects the presumption in favour of sustainable development in NPPF.

3.6 Policy CS10 confirms the Council's support for new development that mitigate their impact on highway and public transport networks and proposal which improve the efficiency of freight transport.

3.7 Policy CS18 Climate Change sets out the Council's approach to seeking a reduction in the carbon footprint of the Borough and includes support for proposals that lead to a reduction in carbon footprint.

3.8 Policy CS19 Development and Design Principles sets out the Council's approach to achieving good design. The Council will require new development to, inter alia:

- Have regard to local context (including scale, height, materials, heritage assets) and make a positive contribution to the street scene, public realm and character of the area.
- Encourage sustainable living and choice through a mix of compatible uses which are well connected to places that people use, including public transport networks.
- Safeguard the amenity of occupants of neighbouring property and avoid adverse environmental impacts.
- Be designed so that it is inclusive and accessible to all and create a safe and secure environment with surveillance to minimise opportunities for crime and vandalism.

3.9 Policy CS20 Heritage and the Historic Environment confirms the Council's commitment to securing the preservation, protection and enhancement of its heritage. It advises that when considering the impact of proposed development on a designated heritage asset, the weight

that will be given to the asset's conservation value will be commensurate with the importance and significance of the asset.

[The Saved policies from Gravesham Local Plan First Review \(Nov 1994, updated 2014\)](#)

- 3.10 Policy TC2 Listed Buildings is considered to be the only relevant saved policy. This advises that the Council's primary consideration for development involving alterations to listed buildings or affecting the setting will be the maintenance of the integrity of the original listed building. Proposals should be sympathetic in terms of massing, scale, appearance and materials.

4 DESIGN AND ACCESS CONSIDERATIONS

- 4.1 This section evaluates the design and access considerations relevant to the application proposal in the context of the key relevant planning policies identified above. It provides an explanation of how the proposal has taken account of the historic and special architectural importance of the site and explains the principles and concepts that have been applied to the design of the development in terms of use, amount, layout, access, scale, appearance, and landscaping.

DESIGN RATIONALE

- 4.2 This application seeks planning and listed building consent for the siting of an InPost Locker.
- 4.3 The InPost Locker will be located within the curtilage of Gravesend Railway Station. The locker will be positioned on an area of hardstanding, within a walled enclosure to east of the main station building, fronting onto Rathmore Road. The locker can therefore be accessed directly from Rathmore Road, without entering the station building.
- 4.4 Lockers such as this often benefit from 'permitted development rights' afforded by Schedule 2, Part 7, Class C 'Click & Collect facilities' of The Town and Country Planning (General Permitted Development) (England) Order 2015 (GPDO) subject to certain conditions being met.
- 4.5 However, in this case, the InPost Locker is located within the curtilage of a listed building, and as such Part 7 Class C rights do not apply. Nevertheless, it is clear that the importance of Click & Collect facilities such as these are recognised by the Government and the Mayor of London as an important and legitimate facility that meets the needs of consumers in today's dynamic retail environment.
- 4.6 InPost Lockers provide a convenient way for customers to collect goods which they have purchased at a time which suits them rather than having to wait for goods to be delivered to their home or place of work.
- 4.7 Click and Collect facilities, such as the locker proposed, have become increasingly popular in recent years. They are often found within areas of heavy footfall, including public transport stations. It is therefore considered that the proposal would not appear incongruous within its setting.
- 4.8 The key tests for this application relate to the significance of any effects arising from the application proposals upon the Grade II Listed Railway Station.
- 4.9 The listing description for the Railway Station demonstrates that the significance of the listed building relates principally to the Station building itself, rather than the platforms, staircases, or other structures. Specifically, no reference is made in the listing to the separate single storey building, or its associated walls, located to the east of the main station building, where the InPost Locker will be sited.
- 4.10 In this respect, the locker will be situated at a distance from the station building itself. The locker will be installed in a relatively discrete location, on a paved area of hardstanding to the east of the main building, adjacent to a brick wall. It will not be fixed to the station concourse or building structure in any permanent manner. Rather, it is 'free standing' and can be easily relocated without causing any damage to the listed building.
- 4.11 Therefore, it is not considered that the proposal will cause any significant harm to the character or appearance of the wider area. Furthermore, given that the locker will be seen in the context

of other structures associated with the station, and car parking, it is considered that the InPost Locker will not harm the significance of the Listed Building.

USE

- 4.12 The locker is filled by one single daily delivery, with approximately 30 collections made each day (with many of these often being 'linked' to existing trips made to and from the station or nearby amenities). Given the limited scale and intensity of the use in the context of the 'host site', there will be no material change in the use of the land.

AMOUNT OF DEVELOPMENT

- 4.13 The application is for the siting of 1 no. InPost Parcel Locker, with dimensions provided below. The amount of development is therefore not significant and will have a very limited impact on the railway building.

LAYOUT

- 4.14 The locker will be located outside the west pavilion of the main railway station building on the paved hardstanding area. The proposal does not therefore have any impact of the layout of the station building itself.

ACCESS

- 4.15 The locker can be readily accessed from Station Road, including drop-off, taxi, bus stands and car parking. Access arrangements for the station will be unchanged as a result of the proposal.

SCALE

- 4.16 The locker measures 5.867m in width, 0.919m in depth and 2.42m in height. Given the minor scale and size of the locker, there will be no material impact on the listed building.

APPEARANCE

- 4.17 The material specifications of the locker are as follows:
- Base: steel zinc-coating (RAL 7016), painting and concrete B20;
 - Lockers: magnelis/ stainless steel (RAL 7016);
 - Roof: metal sheet roof and zinc-coating (RAL 9010);
 - Locker door: magnelis/ stainless steel (RAL 9010);
 - Shelves: stainless steel without coating/magnelis;
 - External panels: magnelis/ stainless steel (RAL 9010); and
 - Main door: galvanized steel (RAL 7016).
- 4.18 The appearance of the Railway Station is largely unaffected by the proposal.

5 SUMMARY AND CONCLUSIONS

- 5.1 This Statement has been prepared on behalf of InPost in support of planning and listed building consent applications for the siting of an InPost parcel locker at Gravesend Railway Station.
- 5.2 This Statement provides an explanation of how the design has taken account of the historic and special architectural interest of the building and explains how the design approach ensures that there will be no harm to the significance of the listed building.
- 5.3 In this respect, the locker will be situated at a distance from the main station building itself. The locker will be installed in a relatively discrete location, on a paved area of hardstanding to the east of the main building, adjacent to a brick wall. It will not be fixed to the station concourse or building structure in any permanent manner. Rather, it is 'free standing' and can be easily relocated without causing any damage to the listed building.
- 5.4 Therefore, it is concluded that the locker is designed and installed to minimise any impacts to the historic fabric of the listed building and will have no detrimental impact on the overall character or appearance of its setting.
- 5.5 Given the limited scale and intensity of the use in the context of the 'host site', there will be no material change in the use of the land. The amount of development is not significant and has a very limited impact on the railway building. It will have no impact on the layout of the station building itself.
- 5.6 The locker can be accessed via Rathmore Road without the need to enter the station. Access arrangements for the station will be unchanged as a result of the proposal.
- 5.7 Given the minor scale and size of the locker, there is no material impact on the listed building. The appearance of the Railway Station is largely unaffected by the proposal.
- 5.8 Overall, therefore the proposal is considered to be appropriate and in accordance with relevant policy and guidance.

APPENDIX 1 – SITE PHOTOGRAPH

Gravesham Borough Council

Photograph 1 – Proposed Location of InPost Parcel Locker, Gravesend Railway Station

