

AH/5578/01(14March2025)GBC

Gravesham Borough Council
Planning Department
Civic Centre
Gravesen
DA12 1AU

14th March 2025



Dear Sir/Madam

**FULL PLANNING PERMISSION AND ADVERTISEMENT CONSENT APPLICATION FOR:
FULL PLANNING PERMISSION AND THE RELOCATION OF THE EXISTING WEBUYANYCAR
POD STRUCTURE WITHIN THE MORRISONS STORE CAR PARK PREVIOUSLY GRANTED
TEMPORARY PERMISSION UNDER LPA REF: 20220017 AND 20220016
AT: WM MORRISON FOODSTORE MORRISONS, COLDHARBOUR RD, NORTHFLEET,
GRAVESEND DA11 8AB:**

Introduction

We are instructed by our client, WM Morrison Supermarkets Ltd (Morrison's), to prepare and submit an application to Gravesham Borough Council seeking full planning permission and advertisement consent.

The application relates to the siting of a WeBuyAnyCar pod structure, with affixed advertising, in the car park of the existing Morrison's foodstore at Coldharbour Road, Northfleet, Gravesend, DA11 8AB. The application seeks to extend previous temporary permission, approved in 2022 under LPA ref 20220017 and 20220016, for the erection of a WBAC pod structure and to relocate the pod to a different area of the Morrison's car park.

This planning application is accompanied by the following documents submitted via the Planning Portal and should be read in conjunction with this letter:

- Design and Access Statement, prepared by Whittam Cox (ref - 170285 298_PL_03 - Gravesend 298)
- Location Plan (ref - 170285 298_PL_01 - Gravesend 298)
- Existing Site Plan (ref - 170285 298_PL_04 - Gravesend 298)
- Proposed Site Plan (ref - 170285 298_PL_02 - Gravesend 298)
- WBAC 'Pod' Plans and Elevations (ref - Off Grid - WBACSOgV1-WCA)

Site and Surroundings

The application site comprises of a part of the existing customer car park for the Morrisons supermarket, which is a standalone single storey building from the early 1990s. The supermarket has its own Petrol Filling Station (PFS) and car wash building to the north of the store and adjacent to Coldharbour Road. It has a service yard and a bus stop with a layby on the eastern side. Access to the store is reached from Coldharbour Road via a roundabout, and the customer car park adjoins on its western side two storey modern housing on the Dundale Estate.

The application site is in the westernmost corner of the Morrisons car park, within the existing parking bays. This application proposes to relocate the previously approved WBAC pod (refs: 20220017 and 20220016) to the opposite side of the westernmost corner, along the southern elevation of the car park. The new location of the WBAC pod will situate the development next to the hand carwash and valeting unit and Medway NHS Breast Cancer Screening.

The proposed location of the WeBuyAnyCar modular pod benefits from good access via the existing car park area and from Coldharbour Road. The current white lines of the parking bays will be removed, and the area will be re-marked with new boundaries. The modular pod structure will be ancillary to our client's existing retail convenience offering.

The Application Site is located in Flood Zone 1 (a low probability of flooding from rivers and seas). The site is not within a Conservation Area, nor does it contain or is adjacent to any listed buildings. There are no trees subject to Tree Preservation Orders associated with the site.

Planning History

The Council's planning portal reveals the following on-site applications that are considered relevant to the application, this is referred to below:

- In January 2022, permission was granted for consent for non-illuminated hoarding adverts for 'WeBuyAnyCar' car collection point pod (LPA ref: 20220017).
- In January 2022, temporary permission was granted for the erection of a 'WeBuyAnyCar' car collection point pod' (LPA ref: 20220016).
- In August 2021, permission was refused for the erection of a car collection point pod (LPA ref: 20210992)

- In August 2021, permission was refused an application for consent for non illuminated hoarding adverts for the period of five years (LPA ref: 20210991).
- In August 2019, temporary permission was granted for the siting of a prefabricated single storey 'Care Store' premises ('pod') (LPA ref: 20190378)

The Proposed Development

As outlined above, this application seeks full permission and the relocation of the existing WBAC pod, granted temporary permission under LPA ref: 20220017 and 20220016. This application proposes to relocate the WBAC pod adjacent to the southern boundary of the Morrisons car park. Please refer to the additional plans for full details.

The pod will be viewed against a backdrop of Roman Road landscaping on the southern boundary of the site. The external vinyl advertising on the pod will be non-illuminated with a colour scheme that is predominantly white with green strips and small colourful cars.

The proposed development seeks to extend permission for a WeBuyAnyCar pod service for the general public within the existing Morrisons car park. WeBuyAnyCar provides a quick easy sale as an alternative to private car sales. Customers are offered an online quotation for the sale of their vehicle and if accepted it can be taken to one of their 140 local purchasing points across the UK. The aim of these structures is to operate a sustainable service coinciding with existing shopping trips.

The proposed prefabricated modular single-storey pod is modest in size and will be positioned within two existing parking bays. Moreover, to support business operations, WeBuyAnyCar will require 10 undesignated parking spaces to ensure that space is available for customers and so that regular collection can occur without overspilling onto the car park's adjoining areas.

The undesignated parking spaces are located outside the usual customer parking area. The cars will stay on site for a maximum of 72 hours; however, this is generally a much shorter period. The purchased cars are removed from the site by individual vehicle collections.

By introducing a new pod on-site, the business will be able to expand its services and thus increase the current level of employment. WM Morrison Supermarkets Ltd has confirmed that the WeBuyAnyCar service, which is highly valued by Morrisons customers, firmly aligns with their plan to bring more

popular and useful services to the communities that they serve. No disruption to their normal operation will be generated.

The pod proposed is the 'off grid' model and will be placed on Jack Pads to level it on the existing car park surface. The pod is sited to the rear of the existing parking bays to allow space to the front for customers / staff to exit the pod without entering directly into oncoming traffic. The pod will generate electricity from photovoltaic solar panels on the roof and will be heated through the combustion of HVO fuel.

Policy Guidance

The Statutory Development Plan comprises the Gravesham Local Plan Core Strategy (adopted September 2014) and the 'saved' policies from the Gravesham Local Plan: First Review (1994). Other material considerations include the policies of the National Planning Policy Framework (NPPF) (2021), Planning Practice Guidance (PPG) and National Design Guidance. Supplementary Planning Guidance (SPG) 3 'Advertising Control Policy Guidelines' (1996; amended 2020) and SPG 4 'KCC Parking Standards' (2006) are also material considerations in the determination of the applications. The policies considered relevant to the proposals are outlined below.

Gravesham Local Plan Core Strategy (September 2014)

Policy CS01 - Sustainable Development
Policy CS02 - Scale & Distribution of Development
Policy CS08 - Retail, Leisure and the Hierarchy of Centres
Policy CS11 - Transport
Policy CS18 - Climate Change
Policy CS19 - Development & Design Principles

Gravesham Local Plan: First Review (1994)

'Saved' Policy P3 - Vehicle Parking Standards
'Saved' Policy T5 - New Access onto Highway Network
'Saved' Policy TC8 - Advertisement Control

The National Planning Policy Framework (2024) is also a material planning consideration that must be taken into account where it is relevant to a planning application. The following paragraphs are considered particularly appropriate to the proposed development:

Paragraph 91 - Vitality of Town Centers

Paragraphs 115-117 - Considering Development Proposals re: Sustainable Transport

Paragraph 124 - Promotion of Previously Developed or 'Brownfield' Land

Paragraph 135 - High Quality Design

Paragraph 141 - Advertisements

SPG 4 Kent Vehicle Parking Standards (2006)

SPG 4 'Kent Vehicle Parking Standards' Supplementary Planning Guidance (SPG) Document sets out that for food retail premises (formerly Use Class A1) over 1,000sqm, 1 space per 14sqm is required.

Planning Considerations

Principle of development

The application site utilises previously developed land within the Morrisons car park by proposing Sui Generis use. This proposal will benefit Gravesham Borough Council by generating employment and providing a range of employment types within a currently underutilised site. The proposals will also provide benefits by offering sustainable business opportunities to the general public. The scale of the proposals is minimal, not at odds with the surrounding uses on-site and will be ancillary to the primary retail use. The proposal is, therefore, in accordance with the spatial vision of the local plan that states that *"by 2028, Gravesham will have reinvented and regenerated itself from an area with predominantly heavy riverside industry to one that offers a more diverse range of employment and housing which respects its unique built, historic and natural environment. The regeneration will have made the most efficient use of land by concentrating mixed use development on previously developed and greenfield urban sites with access to a good range of services and facilities which will have minimised the need to travel"*. The proposal is also in accordance with Chapter 11 of the NPPF, which promotes the effective use of land.

Temporary permission has previously been granted for the siting of a WBAC pod structure within the existing car park, assigned LPA ref: 20220017 and 20220016, for the WBAC pod to be situated on the western edge of the car park. Since this permission was granted, there have been no relevant changes

to the statutory development framework for Gravesham Borough Council. The principle of development on site was considered acceptable in terms of the following relevant criteria:

Principle of the Development– *"It is not considered that the current proposal would have a material impact of the vitality and viability of the town centre or other centres and the size of the development is considered insignificant and it would not detract from the main town centre uses and as such a sequential assessment would not be required."*

Design, Character and Appearance – *"It is considered that the proposals are of appropriate design and would not cause harm to the street scene, the character and appearance of the supermarket, or the surrounding area and, therefore, complies with Policy CS19 (Development and Design Principles) of the Gravesham Local Plan Core Strategy (LPCS) (2014) and Section 12 of the National Planning Policy Framework (NPPF) (2021)."*

Impact on Local Amenity – *"Neither the pod unit, nor the advertising proposed would have any detrimental impact on the amenity of any surrounding property. The pod unit is small and single storey, the advertisements are not illuminated and as such, it is considered in accordance with Policy CS19 (LPCS) by virtue of safeguarding amenity."*

Highways – *"The Highway Officer has raised no objection to the development, but after discussions considered that a temporary permission would be appropriate. The Highway Officer stated that although the survey data provided demonstrates significant capacity, given that the impact of pandemic is likely influencing supermarket usages and that this could change in time, the temporary permission and provision of further survey data was considered an acceptable solution. The application has been supported by sufficient information for the Local Planning Authority to grant a temporary permission. The survey data shows that the carpark has capacity for a small WeBuyAnyCar.com pod, however, is not conclusive enough in order to grant a long-term approval. In addition, the collection strategy has been demonstrated in more details and is acceptable."*

The previous permission therefore outlines that the principle of development is acceptable and that the development would not need to undergo a sequential test. The Officers' report concludes in accordance with Policy CS01 (Sustainable Development), Policy CS02 (Scale & Distribution of Development) and Policy CS08 (Retail, Leisure and the Hierarchy of Centres). However, temporary permission was granted due to concerns surrounding the capacity of the existing Morrisons car park. This will be discussed in detail below.

Highways and Parking

Temporary permission was granted due to Officer concerns surrounding the existing and proposed capacity of the Morrisons car park and the effect of changing usage over time. The development will, at max capacity, reduce the number of spaces by 12, and result in an overall loss of 2 spaces for the placement of the pod. The effect of this reduction in capacity was previously assessed within the application ref: 20220017 and 20220016). Full details are provided below:

The Technical Note includes a car park accumulation survey, which was undertaken between Monday 1 November and Sunday 7 November 2021. The survey revealed that the maximum car park occupancy was 63% (270 spaces), between 10:00 and 11:00 on Saturday 6 November. Therefore, based on the busiest period at the store, some 157 spaces (37%) were unoccupied.

The Technical Note substantiates its findings with a proposed car park accumulation survey, which concludes that the predicted maximum occupancy in the busiest time period would be 65% (270 spaces), with some 144 spaces unoccupied. It concludes that the car park will continue to operate well within capacity with the proposed development in place.

As confirmed in the Technical Note and Proposed Site Plan, a total of 424 no. car parking spaces are proposed. 'Saved' Policy P3 refers to SPG 4, which sets out the Kent vehicle parking standards. 'Saved' Policy P3 states (underlined for our emphasis), 'the Borough Council will expect development to make provision for vehicle parking, in accordance with the Kent County Council Vehicle Parking Standards, as interpreted by Gravesham Borough Council, unless justified as an exception.'

Whilst the proposed number of parking spaces falls slightly below policy requirements, the Technical Note provides robust justification that the number of spaces proposed is in excess of actual requirements.

We note that the original survey, produced by Bryan G Hall, was considered appropriate by the Highways officer who "raised no objection to the development, but after discussions considered that a temporary permission would be appropriate".

Over the three-year period in which the WBAC pod has operated within the Morrisons car park, the client has not been made aware of any issues raised by customers or the Council in respect of the operation of the pod and its impact on the car park and surrounding highways. This confirms that the

proposed number of car parking spaces provided is sufficient for the Morrisons car park, and supports the overall argument outlined within the planning application ref: 20220017 and 20220016, as set-out above. The proposal is therefore considered to be in accordance with Local Plan Policy CS11 and 'saved' policies P3 and T5, as well as the relevant aspects of the NPPF, and should be granted full approval.

Design and Sustainable Construction

The new location of the development site is considered a low-key location outside of the main Morrison's foodstore parking area, resulting in the development having a negligible impact in the context of the wider commercial retail site. The elevations are formed from composite panels, displaying vinyl signage in company colours. The dimensions of the pods are detailed in the proposed pod and store elevations plans submitted alongside this application. The proposal's design, scale and use are considered appropriate for the context of the commercial area.

The pod proposed is the 'off grid' model, which generates electricity from PV solar located on the roof, with heating generated by combustion of HVO fuel. WeBuyAnyCar manufactures the prefabricated modular single-storey pods using high-quality, environmentally efficient, factory-controlled construction techniques. As such, the application complies with sustainable design and construction guidance that requires development to be capable of mitigating and adapting to climate change. The proposal is therefore in accordance with Policy CS18 (Climate Change) and Policy CS19 (Development & Design Principles).

Amenity

The WeBuyAnyCar Pod Structure will only be used for the sale of used cars and will not generate significant levels of noise. Furthermore, the proposed opening hours will reflect the Morrisons foodstore hours of operation. The proposal is, therefore, in line with Policy CS19 (Development and Design Principles).

Conclusion

The application adheres to all relevant policies and legislation. As such we respectfully request that this application is granted full planning permission without delay.

The appropriate fee has been paid via the Planning Portal to Gravesham Borough Council. The fee was calculated using the most up-to-date information and has been submitted along with the application.

Should you have any queries regarding this application, please do not hesitate to contact Anna Heyes via email at anna.hey@peacockandsmith.co.uk or telephone 07539 807590. We look forward to receiving receipt of your written confirmation of this letter, other drawings and included documents.

Yours faithfully,



Peacock & Smith