



**Architects**

**Erection of a Shed for servicing & maintaining  
coaches including an office on a mezzanine  
floor & storage on the ground floor**

**at**

**Grange Travel Coach Hire Limited  
Canal Road  
(accessed off Canal Basin)  
Gravesend  
DA12 2RS  
(site address postcode DA12 2RN)**

**Design & Access Statement**

**3<sup>rd</sup> October 2023**

**DAC Architects  
21 Stone Street  
Gravesend Ken  
DA11 0NP**

## **Introduction**

The shed was constructed in early 2023. A planning application for this shed has been refused under ref 2023/0239 dated 21<sup>st</sup> July 2023.

DAC Architects have been appointed to prepare & submit a fresh planning application which addresses the reasons for the refusal.

## **Reasons for Refusal and Action taken**

1. In the absence of a preliminary risk assessment, the proposal fails to demonstrate that the risks of pollution to controlled waters are acceptable or can be appropriately managed. The proposal therefore fails to comply with the contamination requirements of Policies CS18 and CS19 of the Gravesham Local Plan Core Strategy 2014 and paragraph 185 of the National Planning Policy Framework 2021.

The planning application is for the building as opposed to the operation as the site has been a lorry or coach park for many years. The shed will enable regular vehicle maintenance to be carried out under better conditions but these operations were carried out before the shed was built. Paint shop and bodywork operations are carried out off-site by specialists. There are no additional operations being carried out as a result of the construction of the new building.

Notwithstanding this oils etc resulting from this work will be disposed off site and will not go into the ground or the drainage system or the canal basin. To this end there is no mains water or running water in the building. The operation uses a waste oil tank and the client has a contract with a commercial waste disposal company to empty it.

From the planning officers report Environmental Health have raised concerns about the historic landfill history of the application site. Obviously the building has been constructed so we have obtained details of the foundations as built. These consisted of a 200mm thick reinforced concrete floor slab with a minimum 150mm thick compacted granular sub-base. Michael Evans Associates drawing 18-086 SK1 is submitted in support of this planning application to show the foundation design.

It will be noted that near the perimeter of the rc slab a note states a minimum of 450mm from ground level to the underside of the sub-base. The very shallow nature of this work together with the lack of new processes minimises the impact on the existing ground.

2. In the absence of a noise impact assessment, the proposal fails to demonstrate the level of noise nuisance from the vehicle maintenance activities or hours of operation, which would have the potential to adversely impact the amenities of neighbouring properties. As such, the proposal would fail to comply with the requirements of Policy CS19

of the Gravesham Local Plan Core Strategy 2014 and paragraphs 130 and 185 of the National Planning Policy Framework 2021.

A Noise Impact Assessment is submitted in support of this planning application under ref 142324 dated 18/09/23. The report concludes that, *“Noise control recommendations are not required to meet the likely planning requirements of Gravesham Borough Council. The predictions show that the noise from the portal frame shed will be at least 10dB below the typical background noise level at the nearest residential property.”*

3. In the absence of sufficient information about staff/driver numbers or a parking/cycle plan, it is unclear whether there would be any overspill parking, which would have the potential to be detrimental to highway safety, contrary to the requirements of Policy CS11 of the Gravesham Local Plan Core Strategy 2014, and Policies T1, T5 and P3 of the Gravesham Local Plan First Review 1994.

The client has confirmed that Grange Travel Ltd has a DVSA PSV operators license authorising 30 coaches to be parked in the yard and an additional 30 coaches in the yard across the road at Unit 12, Albion Parade, approximately 100 metres away.

Grange Travel Ltd operate coaches of many different sizes including MPVs minibus and mid sized coaches, as well as the larger coaches.

In addition to the coaches there is also parking for a maximum of 14 cars for workshop and office staff. Separate parking is not required for the coach drivers because drivers park their cars in the space they take the coach from.

There is an EV car charger on site and space for 2 EV's to be charged.

4. In the absence of sufficient information about the foundations of the building and how this impacts the archaeology of the site, and in particular the infilled section of the Thames Medway Canal, the proposal fails to comply with the requirements of Policy CS20 of the Gravesham Local Plan Core Strategy 2014 and paragraphs 194, 195 and 197 of the National Planning Policy Framework 2021.

Michael Evans Associates drawing 18-086 SK1 is submitted in support of this planning application to show the foundation design. The maximum depth of dig is 450mm from ground level. The very shallow nature of this work minimises the impact of the dig. We have not been notified of any items of archaeological interest being discovered.