



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

Our Ref: MG/JFC/38575

2nd October 2026

Dear Sir/ Madam,

**THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT)
(AMENDMENT) (ENGLAND) ORDER 2015**

**APPLICATION UNDER SCHEDULE 2, PART 7, CLASS H FOR A PROPOSED EXTENSION
AT UNIT K, SPRINGHEAD ENTERPRISE PARK, NORTHFLEET, GRAVESEND, KENT, DA11
8HH**

We write on behalf of our client, PrepWorld, in support of an application for a Certificate of Lawful Proposed Development in respect of an extension to the existing industrial building at Unit K, Springhead Enterprise Park, Northfleet, Gravesend, Kent DA11 8HH.

The application is made under Schedule 2, Part 7, Class H of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). This covering letter assesses the proposed development against the relevant limitations and conditions set out within Class H.1 and H.2.

This covering letter should be read in conjunction with the following documents:

- Covering Letter (Ref: MG/JFC/38575)
- Location Plan (Ref: 10076-100-001)
- Existing and Proposed Site Layout (Ref: 10076-100-002)
- Existing and Proposed GA/ Floor Plans (Ref: 10076-100-003)
- Existing and Proposed Elevations (Ref: 10076-100-004)

Background to Application

PrepWorld is seeking to modernise the existing facility, improve operational efficiency and increase processing and storage capacity. The wider proposals include a number of works across the Site; however, this application is limited to the eastern extension to the existing building.

A review of the Site's planning history and the proposed works identified the eastern extension as capable of being progressed under the permitted development rights available to industrial and warehouse premises under Part 7, Class H of the GPDO.

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The Site

The Site extends to approximately 3.5ha and forms part of Springhead Enterprise Park, an established commercial and industrial estate in Northfleet. The Site contains a substantial industrial building occupied by PrepWorld, together with associated plant, parking and servicing areas.



Figure 1: Approximate site location edged in red (Courtesy of Google Earth)

The building occupies the central part of the Site, with parking and servicing areas arranged around its perimeter. The Site is principally surrounded by estate roads and other commercial premises, with residential developed located beyond its western, southwestern and southern boundaries.

Vehicle access is provided from the internal Springhead Enterprise Park road network, which connects with Springhead Road to the east and Thames Way to the north.

The Site is not on article 2(3) land, it is not within a Site of Special Scientific Interest and there are no listed buildings within the Site.

According to the Environment Agency's flood risk maps, the site is entirely within Flood Zone 1, indicating the lowest risk of flooding.

Planning History

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A review of Gravesham Borough Council's online planning records has identified the following applications as relevant to the Site.

Reference	Description	Decision
20240746	Installation of a trade effluent balancing plant.	Approved (31/10/2024)
20220426	Erection of a South elevation non illuminated building mounted sign, east elevation illuminated building mounted sign with Totem and North elevation non illuminated building mounted sign and Totem	Approved (23.06.2022)
20220425	Installation of 3 no. building mounted signs and 2 no. "Totem" signs external to site entrance points	Withdrawn (14.06.2022)
20210671	Erection of internal fence and turnstiles to staff entrance, remove existing fence and kerbs to redundant HGV trailer parking area, apply markings to redundant HGV trailer parking area to allow use as additional car parking and apply road markings to set out new accessible parking spaces and new EV charging spaces.	Approved (21.10.2021)
20191120	Erection of tray storage warehouse building adjacent to south east corner of existing industrial/warehouse building; external alterations including new fire escape stairs; phased re-cladding of existing industrial/warehouse building; alterations to and additions to existing car parking layout.	Withdrawn (15/07/2020)
19990326	Erection of single storey extension to warehouse to form covered loading bay and single storey extension to cold store to form covered raise pallet store.	Approved (19.07.1999)
19910746	Erection of warehouse extension on the north elevation to form cold store and truck charging bay and formation and laying out of additional lorry and car parking spaces.	Approved (02.07.1992)
19880031	Display of fascia sign illuminated by overhead lamp units.	Approved (02.03.1988)
19850254	Section 53 determination as to whether planning permission is required for erection of a detached double garage	Approved (15.05.1985)
19840614	Display of illuminated fascia box sign	Approved (16.08.1984)
19840052	Section 53 determination as to whether planning permission is required for the erection of a warehouse including a three storey office toilet and canteen block with provision for nineteen lorry and 101 car parking spaces	Approved (25.01.1984)

Table 1. Relevant Planning History

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The planning history has been reviewed to establish whether any previous permissions restrict permitted development rights. The original warehouse was the subject of planning application 19840052 and the certificate issued did not contain conditions restricting those rights.

Planning application 19910746 approved a warehouse extension together with additional lorry and car parking. Condition (ii) required the identified parking and manoeuvring areas to remain available and prevents development, including development that would otherwise be permitted by the GPDO, where it would conflict with those areas.

The proposed extension has been reviewed against the approved parking and manoeuvring layouts and subsequent planning history. As shown in Figure 2, the proposed eastern extension avoids the areas of parking previously protected under application 19910746.

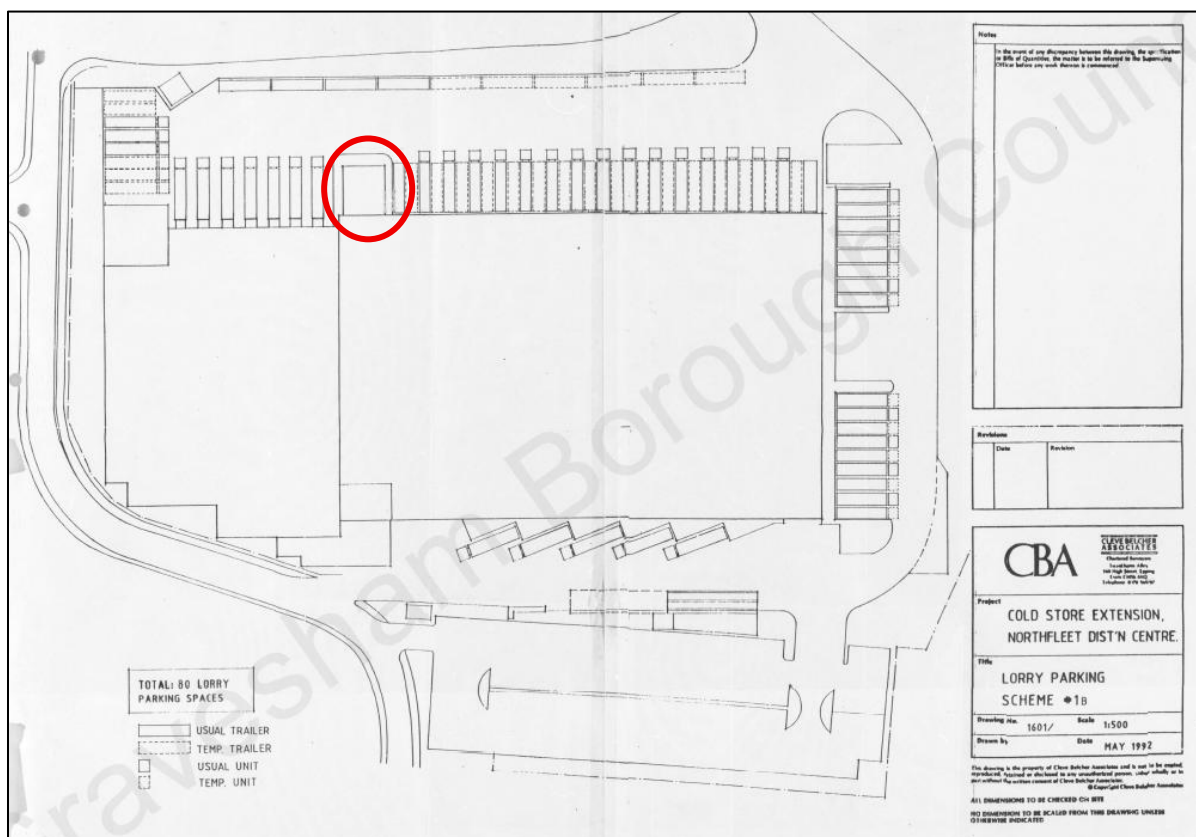


Figure 2. Approved Site Layout - Application 19910746

Planning application 20240746 also approved development over part of the historic HGV parking and manoeuvring area. The Council accepting the loss of those spaces on the basis that sufficient loading and manoeuvring capacity would remain. As those spaces have already been lawfully removed, the proposed eastern extension would not result in any further loss of parking or turning space.

Proposed Development

The proposed development comprises a two-storey extension to the existing industrial building, on the area currently occupied by the existing welfare facility. The extension



would provide additional operational accommodation directly associated with PrepWorld's existing undertaking.

The characterisation of these works as an extension and alteration is supported by the principles established in *Shimizu (UK) Ltd v Westminster City Council [1997] 1 WLR 168*. Although the case concerned listed buildings, the House of Lords recognised that, while the demolition and replacement of part of a building cannot constitute an alteration of that part, it "can constitute an alteration of the whole". The judgment further states that:

"Works which involve the pulling down and breaking up of part of the building, falling short of its destruction, will fall within the expression 'alteration'."

The judgment also confirms that "what mattered would be what was left". In this case, the principal industrial building would remain, with only the existing welfare element removed. The works therefore fall short of the destruction of the existing building as a whole and can properly be characterised as an extension and alteration

The description of the proposed development is as follows:

"Certificate of Lawful Proposed Development for a two-storey extension to the existing industrial building under Schedule 2, Part 7, Class H of the GPDO"

Information in Reference to Class H Part 1

Class H permits the erection, extension or alteration of an industrial building or warehouse, subject to the limitations and conditions set out within H.1 and H.2. These are considered below.

H.1 Development is not permitted by Class H if—

a) the gross floor space of any new building erected would exceed—

- i) for a building on article 2(3) land or on a site of special scientific interest, 100 square metres;***
- ii) in any other case, would exceed 200 square metres;***

The proposal comprises an extension to the existing industrial building rather than the erection of a new building. H.1(a) is therefore not applicable.

b) the gross floor space of the original building would be exceeded by more than—

- i) in respect of an original building or a development on article 2(3) land, 10% or 500 square metres (whichever is lesser);***
- ii) in respect of an original building or a development on a site of special scientific interest, 25% or 1,000 square metres (whichever is the lesser);***
- iii) in any other case, 50% or 1,000 square metres (whichever is the lesser);***

The Site is not located on article 2(3) land or within a Site of Special Scientific Interest. Accordingly, the applicable limitation is that the gross floor space of the original building must not be exceeded by more than 50% or 1,000sqm, whichever is the lesser.

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For the purposes of Class H, paragraph H.4 confirms that an “original building” does not include any building erected at any time under Class H. It is acknowledged that the wider GPDO definition of “original” refers to the building as it existed on 1 July 1948 or, where constructed after that date, as originally built.

In this case, the proposed eastern extension would provide 510sqm of additional gross floor space (255sqm per floor over two storeys). The extension is therefore below 1,000sqm and remains within the applicable limitation based on either potential “original” building baseline. The 1,000sqm limit is therefore met and the proposal complies with H.1(b).

c) the height of any part of the new building erected would exceed—

- i) if within 10 metres of a boundary of the curtilage of the premises, 5 metres;***
- ii) in all other cases, the height of the highest building within the curtilage of the premises or 15 metres, whichever is lower;***

As set out above, the proposal is an extension to the existing industrial building and H.1(c) is therefore not applicable.

d) the height of the building as extended or altered would exceed—

- i) if within 10 metres of a boundary of the curtilage of the premises, 5 metres;***
- ii) in all other cases, the height of the building being extended or altered;***

The proposed extension is located more than 10 metres from the boundary of the curtilage and the extension would not exceed the height of the existing building. The proposal therefore complies with H.1(d)

e) any part of the development would be within 5 metres of any boundary of the curtilage of the premises;

The development is located more than 5 metres from the boundary of the curtilage and therefore complies with H.1(e).

f) the development would lead to a reduction in the space available for the parking or turning of vehicles; or

The proposal would not result in a reduction in the space currently available for vehicle parking or turning and therefore complies with H.1(f).

As set out above, the proposed extension has been reviewed against the historic parking and manoeuvring layouts and subsequent planning history. As shown in Figure 2, the approved layout under application 19910746 identifies the areas to be retained for vehicle parking and manoeuvring, with the proposed extension falling outside these areas. The proposal would therefore not result in the loss of any historically approved parking or manoeuvring space

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g) the development would be within the curtilage of a listed building.

There are no listed buildings within the site and therefore complies with H.1(g).

Conditions

H.2 Development is permitted by Class H subject to the following conditions—

a) the development is within the curtilage of an existing industrial building or warehouse;

The proposed development is wholly within the curtilage of the existing industrial building and therefore complies with H.2(a).

b) any building as erected, extended or altered is only to be used—

- i) in the case of an industrial building, for the carrying out of an industrial process for the purposes of the undertaking, for research and development of products or processes, or the provision of employee facilities ancillary to the undertaking;***
- ii) in the case of a warehouse, for storage or distribution for the purposes of the undertaking or the provision of employee facilities ancillary to the undertaking;***

The proposed extension would form part of PrepWorld's existing operations and provide additional operational accommodation directly associated with the established industrial undertaking. The proposed use therefore complies with H.2(b).

c) no building as erected, extended or altered is used to provide employee facilities—

- i) between 7.00pm and 6.30am, for employees other than those present at the premises of the undertaking for the purpose of their employment; or***
- ii) at all, if a quantity of a dangerous substance is present at the premises of the undertaking in a quantity equal to or exceeding the quantity listed in the entry for that substance in Parts 2 or 3 of Schedule 1 to the Control of Major Accident Hazards Regulations 1999(1);***

The extension would principally provide operational accommodation rather than employee facilities. To the extent that any ancillary welfare provision is included, this would only be available to employees present at the premises for the purposes of their employment.

PrepWorld has also confirmed that the relevant dangerous substances threshold is not exceeded at the premises and the proposal therefore complies with H.2(c).

d) any new building erected is, in the case of article 2(3) land, constructed using materials which have a similar external appearance to those used for the existing industrial building or warehouse; and



As set out above, the proposal is an extension to the existing industrial building and H.2(e) is therefore not applicable.

e) any extension or alteration is, in the case of article 2(3) land, constructed using materials which have a similar external appearance to those used for the building being extended or altered.

As set out above, the Site is not on article 2(3) land and as such would not be required to meet the exception set out.

Nevertheless, the proposed extension would be constructed using materials appropriate to the existing industrial building and its context.

Conclusion

For the reasons set out above, it is considered that the proposal falls within Schedule 2, Part 7, Class H of the GPDO. The development comprises an extension to the existing industrial building, remains ancillary to PrepWorld's operations and would not result in a loss of parking or turning space.

Given the above, it is respectfully requested that prior approval is given for the development

Yours sincerely,

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