

Marling Cross, Hever Court Road

Planning, Design and Access Statement

Highways England

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Quality information

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1. Introduction

- 1.1 This Planning, Design and Access Statement supports a Full Planning application to create a temporary compound at Marling Cross on Hever Court Road. This would include installing temporary portable cabin units for office and welfare use over two storeys, a storage/ laydown area for equipment and car park, minimal lighting and perimeter landscaping. The site will be enclosed by a 3m high external fence to improve site security (existing fence is 2m high). Permission is sought for a temporary period of up to two years.
- 1.2 The planning application is submitted to Gravesham Borough Council (GBC) as the determining local planning authority under the Town and Country Planning Act 1990 (as amended) and the Town and Country Planning (Development Management Procedure) Order 2015 for the following proposal:

Erection of temporary portable cabins with associated fenced off laydown area and car parking area with 3m fence around the site, lighting and perimeter landscaping.
- 1.3 The site is located on the southern outskirts of Gravesend and currently consists of an area of hardstanding. The Proposed Development is necessary to facilitate the ground investigation works being undertaken by Highways England to inform the Lower Thames Crossing (LTC) project which would enable a tunnel crossing of the River Thames downstream of the existing Dartford Crossing.
- 1.4 The site has historically been used as a lorry park, but is currently vacant.
- 1.5 This Statement explains how the proposed temporary facility responds to relevant national and local planning policies.
- 1.6 The documents and drawings that have been submitted with this application are listed in table 1 below.

Table 1 Schedule of Accompanying Documents and Drawings

Document/Drawing	Prepared by
Application Form	AECOM
CIL Form	AECOM
Marling Cross Location Plan	AECOM
Marling Cross Site and Floor Plan	AECOM
Marling Cross Proposed Elevations	AECOM
Flood Risk Assessment	AECOM
Transport Appraisal	AECOM
Preliminary Ecological Appraisal	AECOM
Noise Assessment	AECOM
Lighting Assessment	AECOM
Landscape and Visual Technical Note	AECOM

- 1.7 The remainder of this document is structured as follows:
 - **Chapter 2** describes the Application Site's location and immediate context.
 - **Chapter 3** outlines the relevant Planning History of the Site prior to the submission of this Planning Application.
 - **Chapter 4** sets out the Proposed Development for which permission is sought under this Planning Application.
 - **Chapter 5** sets out the planning policy context in which the planning application is sought.
 - **Chapter 6** provides a thematic planning policy response against the planning policy context outlined in Chapter 5, and considers design, access and proposed materials.
 - **Chapter 7** provides a summary of the reasons why planning permission should be granted for this Planning Application.

2. Application Site Description

- 2.1 The Marling Cross site is located on the southern outskirts of Gravesend, approximately 4km to the south east of Gravesend town centre. The site is accessed via Valley Drive and is in close proximity to the A2 (Watling Street). It is bound by the site access road and a footpath to the north, Valley Drive to the east and open land to the south and west.
- 2.2 The site is 2,430sqm and consists of an area of hard-standing and has historically been used as a lorry park but is currently vacant. The site is also currently surrounded by a 2m fence.
- 2.3 To the north and east of the site are residential dwellings on MacKenzie Way and Franklin Road. The site is separated from the dwellings at MacKenzie Way by features including brick walls on curtilage boundaries and mature trees. Properties on Franklin Road are set back and screened from the site by features including brick walls on curtilage boundaries and mature trees. The A2 lies to the south of the site and forms the edge of the urban boundary, separating the site from the rural land that lies to the south of the A2. The land directly to the west of the site is undeveloped wood and scrubland.
- 2.4 The site is not covered by any landscape designations, nor is it close to any listed buildings or conservation areas. The Green Belt boundary runs up to the two roundabouts located south of the site, but the site itself is not located in the Green Belt. There are no statutory or non-statutory designated Sites of Importance for Nature Conservation (SINCs) that could be directly or indirectly affected by the Proposed Development.



Figure 1 Marling Cross Location Plan

3. Relevant Planning History

- 3.1 This section sets out the planning history of the Site and its immediate context, relevant to the proposals submitted under this Planning Application.
- 3.2 No planning history directly related to the site was found, however it is known that it was previously informally occupied by travellers.
- 3.3 The only relevant planning history for this site is a planning application at Cobham Lodge, Valley Drive, DA12 5UE, across from the application site, which is currently pending consideration (2019/0169). The application is for the demolition of an existing house and outbuildings and the erection of a part 3 storey, part 4 storey building for the residential development of 20 one bedroom, 41 two bedroom and 3 three bedroom apartments with associated car parking.

4. Proposed Development

- 4.1 The Lower Thames Crossing (LTC) project will provide a tunnel crossing of the River Thames downstream of the Queen Elizabeth II Bridge at Dartford. Perfect Circle JV Limited (PCJV) has been appointed by Highways England Company Limited (Highways England) to perform Ground Investigation (GI) works for the LTC project. As a core member of PCJV, AECOM has been designated responsible for delivery of the investigation as Principal Contractor under a management contractor form of agreement.
- 4.2 The project requires several satellite compounds to provide laydown areas for equipment used during the GI, as well as providing welfare and office facilities for staff.

Use

- 4.3 The Application seeks approval for the temporary change the use of the site from car park (Sui Generis) to a Compound with B1a Office uses/B8 Storage and Distribution/Sui Generis for a period of up to 2 years. It is proposed that temporary portable cabin units are provided on the southern half of the site for office, with ancillary welfare facilities and reception (Use Class B1a). This will offer the space required to support the GI work, providing welfare and office facilities. A laydown area for storage (Use Class B8) and car parking area (Sui Generis) are also proposed to support the staff employed on the GI work.
- 4.4 The laydown/storage area may be used to store some hazardous substances however the quantities identified under Schedule 1 Part 1 of The Planning (Hazardous Substances) Regulations 2015 will remain below the controlled quantities listed. It will for instance be necessary to store a small amount of fuel/oil on the site, for use in mobile plant associated with the site operations. Fuel will be stored on the site in designated bunded, lockable towable fuel bowers. When not being employed on site, the bowers would also be stored within an impermeable bund with a volume capacity of 110% of the quantities stored. The 2002 Control of Substances Hazardous to Health (COSHH) Regulations have been observed to ensure health and safety on site.
- 4.5 The Proposed Development will also require the installation of a number of luminaires to provide visual comfort as well as safe access and egress.
- 4.6 Two noise generators are proposed on the southern end of the site. Both generators will operate during the daytime, however only one generator will operate intermittently during the evening and night time.

Amount

- 4.7 The proposed portable cabins have a total floor area of 380sqm (Gross Internal Area). This comprises offices, ancillary welfare facilities and reception.
- 4.8 The car parking area will measure approximately 750sqm to accommodate up to 32 parking spaces. The laydown area will cover approximately 520sqm.

Scale

- 4.9 The proposal includes 10 two-storey modular units measuring up to 6.2m tall in total, 5 single-storey units, a car park, a storage area and a 3m tall perimeter fence.

Layout

- 4.10 Two storey cabins are proposed on the south western portion and single storey on the south eastern portion. The north eastern part of the site will be used for a storage/ laydown area for equipment, while the north western part of the site will be used as a car park area as shown in Figure 2 below. Internal fencing will separate the storage/ laydown area from the rest of the site. The existing access to the Marling Cross site will be maintained with security placed at the entrance.

Landscaping

- 4.11 The portable cabin building is to be sited on a hard standing area. A section of planting measuring approximately 25m is however proposed in the southern portion of the eastern boundary to fill an existing gap.

Appearance

- 4.12 The portable cabins will be prefabricated with external walls constructed with a steel frame and walls with foam insulation. The portable cabins buildings were chosen as it is a flexible solution that can be hired for the required time and removed at the end of that period with minimal impact on the surrounding environment.

- 4.13 The Proposed Development is similar in nature to the existing transient use of the site and is not likely to result in any noticeable change to the landscape character of the local area. It would not exceed the extent of land recently occupied as a lorry park and no existing landscape features would be lost.
- 4.14 The site is well screened by existing vegetation such that very few visual receptors would notice any change in views.

Access

- 4.15 The site location on Hever Court Road offers easy access to a number of transport links from either personal vehicles or bus links. The nearest bus stops to the site are located on MacKenzie Drive and Valley Drive, approximately 250m and 350m to the north of the site access junction respectively.
- 4.16 A shared footway/cycleway runs to the north of the site between Valley Road and Hever Court Road which forms part of the National Cycle Network (NCN) route 177. NCN177, in the vicinity of the site, runs off-road alongside the A2 Watling Street between Northfleet and Rochester.
- 4.17 During site operation, vehicular access to the proposed site compound will be via the existing priority junction site access on Valley Drive.
- 4.18 A maximum of 50 staff members are expected to travel directly to/from the satellite compound on a daily basis. All staff members will be expected to travel by vehicle. The site compound is expected to generate a maximum of 20 LGVs per day (40 two-way movements) and a maximum of one HGV per day (two two-way movements) during the operational phase. Details of this can be found in the accompanying Transport Appraisal.

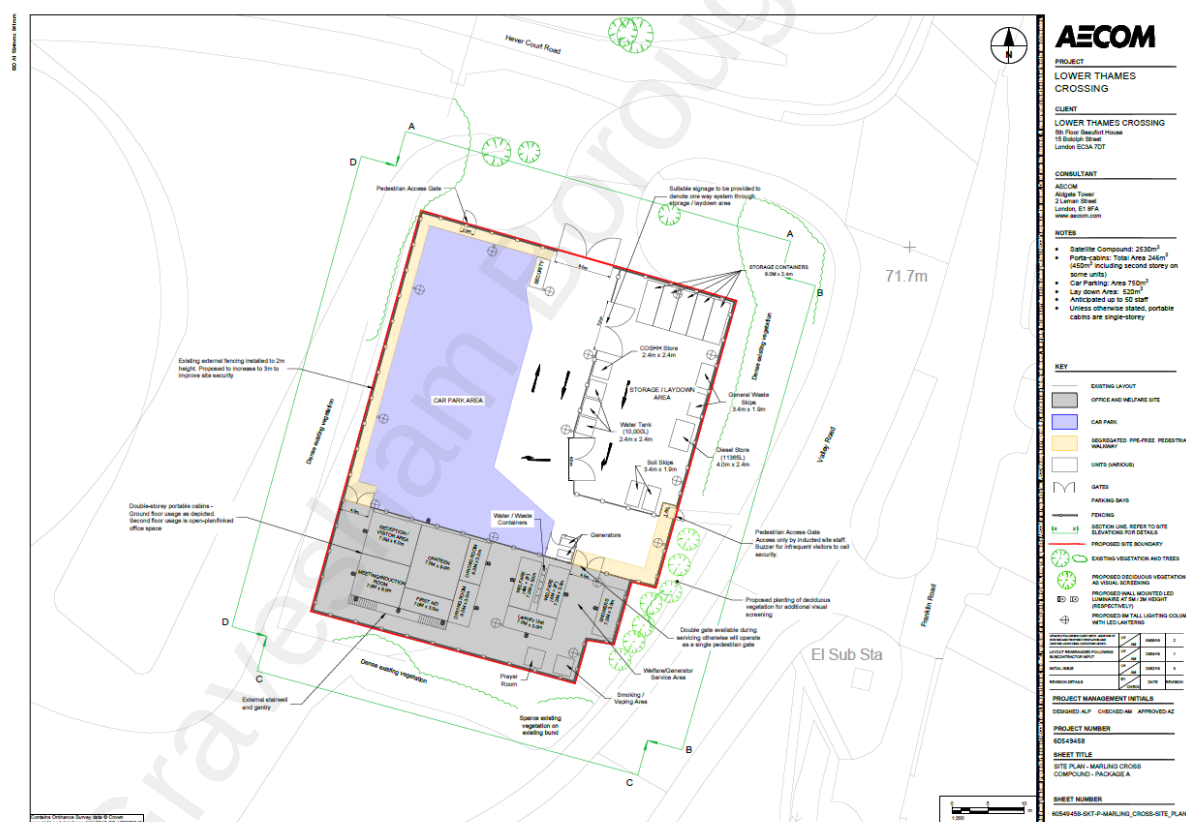


Figure 2 Proposed site layout

5. Planning Policy Context

- 5.1 The Town and Country Planning Act (1990) (referred to as 'The Act'), the Planning and Compulsory Purchase Act 2004 and the Localism Act 2011 are the principal statutory considerations for town planning in England and Wales.
- 5.2 Collectively the three acts create a plan-led system which requires local planning authorities to determine planning applications in accordance with an adopted statutory development plan unless there are material considerations which indicate otherwise (section 38(6) of the 2004 Act as amended by the Localism Act).
- 5.3 In this instance, the relevant development plan for the Site comprises:
- Gravesham Core Strategy adopted 2014
 - Saved policies from the Gravesham Local Plan First Review 1994.
- 5.4 This policy review will also address material considerations, in particular the National Planning Policy Framework (NPPF) (2019).

National Policy

National Planning Policy Framework

- 5.5 In February 2019, the Government amended and updated the revised National Planning Policy Framework (NPPF). This version replaces the previous 2012 and 2018 versions. The policies contained within the NPPF and planning practice guidance are a material consideration for Local Planning Authorities (LPAs) in decision making.
- 5.6 The following paragraphs of the NPPF are of particular relevance to this Planning Application:
- 5.7 Paragraph 80 of the NPPF encourages opportunities for economic growth. In order to achieve this, *"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. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future."*
- 5.8 Paragraph 102 of the NPPF sets out that transport issues should be considered from the earliest stages of development proposals so that *"the potential impacts of development on transport networks can be addressed"*.
- 5.9 Paragraph 118 of the NPPF encourages the effective use of land and sets out that planning policies and decisions should *"promote and support the development of under-utilised land."*
- 5.10 The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development. Paragraph 127 of the NPPF sets out that planning decisions should aim to ensure that developments respond to local character and history and reflect the identity of local surroundings and materials.

Local Policy

The Adopted Development Plan

- 5.11 The current adopted development plan is made up of the Gravesham Core Strategy 2014 and saved policies from the Gravesham Local Plan First Review 1994. These documents set out the planning policies that guide development in the borough. The Core Strategy sets out a long-term vision for the future of Gravesham and contains policies that guide the amount, type, location and detailed design of future development providing a consistent basis against which to decide planning applications. While many of the policies in the saved Local Plan First Review have now been replaced, the remaining policies are still used in determining planning applications.

Material Considerations

Emerging Site Allocations and Development Management Policies Document

5.12 A Regulation 18 consultation was held between April and July 2018 seeking comments on the emerging Local Plan Review Document, Site Allocations Document (Part 1) and Development Management Policies Document (Part 2) (which will replace policies in the Gravesham Local Plan First Review 1994). Given the early stage of these plans, the Local Plan Review Document and Site Allocations Document do not currently contain detailed policies considered relevant to this application. The Development Management Policies Document does contain detailed policies, though these are still at an early stage.

Supplementary Planning Guidance

5.13 In addition to the adopted development plan, there are a number of supplementary planning guidance documents produced by Kent County Council (KCC) that are of relevance to this application. These are listed below :

- Landscape Character (2006)
- Biodiversity Conservation (2006)
- Kent Vehicle Parking Standards (2006)
- The Kent Design Guide

6. Planning Policy Response

Principle of Development

- 6.1 The Proposed Development would support ground investigation works being undertaken by the Applicant to inform the Lower Thames Crossing (LTC) project.
- 6.2 The Proposed Development lies within the urban boundary and would make use of an area of currently unused but previously developed land within the urban area. This follows Gravesham's strategy to prioritise development in the urban area and recycle underused, derelict and previously developed land in the urban area as laid out in Policy CS02 of the Core Strategy.
- 6.3 The site, while currently, vacant, has historically been used as a lorry park and it is considered that the proposed use is compatible with the existing use of the site. The site has excellent access to the strategic highways network which will allow traffic to be channelled quickly out of Gravesend and onto the strategic highway. It is located relatively far from any residential units and is separated from residential housing to the east by Valley Drive and to the north by Hever Court Road and heavy screening. The proposal is for a temporary period of 2 years and, while the Proposed Development will have a minimal impact on the surrounding area.
- 6.4 In line with NPPF paragraph 80 this proposal supports the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The Proposed Development will facilitate ground investigation works which are being undertaken by Highways England to inform the wider LTC Project. This project would enable a tunnel crossing of the River Thames downstream of the existing Dartford Crossing, bringing with it economic benefits for the local area, including investment and job provision. This is also aligned with Policy CS07's aspiration to deliver additional employment opportunities and long-term in the Borough.

Appearance, Design and Materials

- 6.5 In considering the layout of the site, the wider site context, topography, setting and any strategic views have been considered in accordance with Core Strategy Policy CS19 and with reference to the Kent Design, in particular Step 1 which sets out a framework for understanding the site. The site is not covered by any landscape designations, nor is it close to any listed buildings or conservation areas, and it is not anticipated that the Proposed Development would have an adverse impact on any valued landscapes (Local Policy CS12). New planting is proposed to fill the current gap towards the southern end of the eastern site boundary which would provide a long term improvement to the character of the local landscape and enhance biodiversity (Local Policies CS12, CS19).
- 6.6 In line with the NPPF, Policy CS19 sets out that new development should integrate with the surrounding local area. The site is relatively separated from the surrounding residential area and well screened. The KCC Landscape Character SPG (2006) sets out the importance of landscape character and the value of assessing landscape character to ensure that development does not undermine characteristic values of the landscape. Map 1 of the KCC Landscape Character SPG (2006) shows that the site is within the urban area located to the north of the Southfleet Arable Lands Character Area. It is considered that the Proposed Development is similar in nature to the existing transient use of the site and is not likely to result in any noticeable change to the landscape character of the local area (CS12). It is considered that it would integrate into the surrounding area and not appear incongruous (CS19).
- 6.7 The site will be enclosed by a temporary 3m high fencing, for the duration of the site under its proposed use, to improve site security and provide a safe and secure environment in accordance with CS19. The layout and facilities of the Proposed Development are designed to LTC's high standards for welfare provision.

Access and movement

- 6.8 The transport impacts of the development have been considered from the outset in accordance with the NPPF and Core Strategy Policy CS11. The site's location in close proximity to the A2 allows for access to the site while minimising the Proposed Development's impact on the roads within Gravesend.

- 6.9 The Gravesham policies map shows that Valley Drive is designated as a Highways Network District Distributor and that the A2 is designated as a Highways Network Primary Distributor. It is proposed that all vehicles to/from the Proposed Development would be channelled onto the A2; the primary network distributor in accordance with Policy T2 of the Gravesham Local Plan First Review 1994.
- 6.10 While the Proposed Development will lead to some increase in traffic turning off the A2 and onto Valley Drive, the accompanying Transport Appraisal has concluded that this would be minimal. The vehicle activity is expected to be spread throughout the day in order to mitigate the impact on the local highway network in accordance with CS11 of the Core Strategy and any impact is expected to be negligible. The Transport Appraisal shows that there are opportunities for staff to access the site by bus or bike, highlighting the opportunities for sustainable travel (CS11). The nearest bus stops to the site are located on MacKenzie Drive and Valley Drive and footways are provided between the site and the bus stops on Valley Drive. A shared footway/ cycleway runs to the north of the site between Valley Road and Hever Court Road and Valley Drive itself has pavements down either side. Furthermore, suitable signage will be provided to denote the one-way system through the storage/ laydown area.
- 6.11 Parking will be provided on site and it will be ensured that all staff vehicles can be accommodated within the site and laid out in accordance with policy CS11 and saved policy P3 which sets out that provision should be made for vehicle parking in accordance with the Kent County Council Vehicle Parking Standards as interpreted by Gravesham Borough Council. It is envisaged that the proposed parking provision will be calculated using a first principles approach to meet operational requirements, rather than being based on more rigid (and potentially less appropriate) vehicle parking standards for a temporary use/ operational phase. Notwithstanding this, the parking provision will have cognisance to KCC's SPG4 (2006) as this requires deliveries to be accommodated on site and sets out the requirements for parking bay sizes and aisle widths. At the moment, the area allocated for parking ensures that up to 32 spaces can be accommodated however as a result of car sharing it is not anticipated that the car parking area will be used at full capacity.

Environment

- 6.12 Policy CS19 sets out that applications will include details of appropriate lighting and that new development will be located, designed and constructed to avoid adverse environmental impacts from pollution, including light pollution. Given the distance of the site from residential dwellings and its proximity to the A2, it is not considered that site lighting would have a significant adverse impact. A Lighting Strategy Assessment accompanies this application and has identified the lighting parameters that the proposed lighting details would need to comply with for site lighting. These parameters are informed by international and national policy and guidance and the relevant British Standards and as such are considered appropriate.
- 6.13 Policy CS19 sets out that new development will be located, designed and constructed to avoid adverse environmental impacts from pollution, including noise pollution. The accompanying Noise Assessment concludes that no noisy activities or high vibration are associated with the construction and operations of the compound.
- 6.14 In terms of operational use, noise from vehicles accessing the compound and the loading and unloading of equipment has the potential to impact on existing noise sensitive receptors in the area. However, given the previous use of the site as a lorry park, it is unlikely that this would alter the soundscape at the site itself. To address any potential impacts, a set of management protocols are suggested to minimise the impact of these noise sources as far as is practicable. Two generators are proposed to be located in the south eastern section of the site. The noise from these two proposed generators has been assessed and complies with the assessment criteria.
- 6.15 A Flood Risk Statement accompanies this planning statement. The Proposed Development is not within a flood risk area and has an area of less than 1ha. However, the Flood Risk Statement identified the site as being at potential risk of surface water flooding and therefore Policy CS18 has been considered for this proposal.
- 6.16 The Proposed Development is not increasing the footprint of hard standing and therefore it is not considered that it would have a greater adverse impact than the existing use. The accompanying Flood Risk Statement notes the risk of surface water flooding could be managed by ensuring adequate maintenance of the drainage system at the site. The proposed layout should ensure that any residual risk of flooding from this source is minimised.

- 6.17 The KCC Biodiversity Conservation SPG (2006) sets out the importance of biodiversity conservation and key principles which relate to planning and biodiversity conservation; development proposals and biodiversity conservation; ecological survey; and ecological enhancement, mitigation and compensation. Principle 1 sets out that planning proposals which have the potential to impact on wildlife should be accompanied by adequate information; recognise direct, indirect and cumulative impacts of development; provide adequate mitigation and compensation for adverse impacts; deliver positive benefits; and enhance the ecological value of existing sites and habitats. An Ecology Statement accompanies this planning application and concludes that there are no significant ecology constraints to the Proposed Development. A section of new deciduous planting is proposed to fill the current gap of approximately 25m towards the southern end of the eastern site boundary. Whilst such planting would not establish in time to screen westerly views of the Proposed Development, it would outlast the temporary use of the site thereby providing a long term improvement to the character of the local landscape and biodiversity of the site in line with Policy CS12 and CS19.

7. Conclusion

- 7.1 This Planning Statement, and suite of documents submitted in support of the Planning Application, demonstrates that the Proposed Development is appropriate in its location.
- 7.2 Section 6 of the Planning Statement has demonstrated that the Proposed Development is in accordance with relevant policies in the Gravesham Core Strategy (adopted 2014), saved policies from the Gravesham Local Plan First Review (1994), and can achieve sustainable development in accordance with the NPPF.
- 7.3 The Proposed Development is considered to be consistent with policies relating to distribution of development, transport, environment and design in the adopted Local Plan and has employed appropriate measures to minimise any potential adverse impact.

