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Change of use to Offices and Construction of First and Second Floor Extension Unit K6, Northfleet Industrial Estate, Northfleet

Planning Statement

On Behalf of
Jackson Family Holdings

December 2023

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1.0 INTRODUCTION

1.1 This Planning Statement is prepared in support of a Full planning application for the construction of a first and second floor extension to the existing building and its change of use to a mixed warehouse and office. The purpose of the proposed development is to create a new headquarters for an established business, Jackson Lift Group. The application property is Unit K6, Northfleet Industrial Estate, hereafter referred to as 'the Site'.

1.2 The planning application description of development is as follows:

Change of use of building to a mixed warehouse and office use together with erection of first and second floor extension and construction of a multi level car park, together with associated earthworks and drainage.

1.3 This Planning Statement sets out the relevant development history and planning policy background, together with the details of the Site's context and suitability for development.

1.4 It is the conclusion of the Planning Statement that the proposals accord with National and Local Planning Policy Guidance, resolves the issues raised in the recent Appeal Decision and represents a sustainable form of development that should be supported by Gravesham Borough Council and approved without delay (NPPF, para 11).

1.5 The planning application is also supported by the documents listed below, which should be read alongside this Statement. This suite of documents was accepted to validate the previous planning application:

Table 1: Planning Application

Report	Prepared by
1. Flood Risk Assessment	Herrington Consulting
2. Transport Statement	Motion
3. Economic Benefits Infographic	Barton Willmore
4. Phase I Geo Environmental Desk Study and Preliminary Risk Assessment	R.Carr Geotechnical Services
5. Design and Access Statement	Ward Associates
6. Summary Townscape and Visual Appraisal	Arc Landscape Design and Planning Ltd
7. Bat Survey	Hill-Wood and Co.

2.0 APPLICATION SITE & PLANNING HISTORY

i) The Site and Surrounding Area

- 2.1 The Site is located in an existing industrial area within the urban area of Northfleet. The application property is part of a larger subdivided building known as Building K and located to the south side of Lower Road.
- 2.2 The application property has planning permission to be used as a warehouse for storage and distribution (Use Class B8) and internally accommodates a large warehouse area with ancillary office accommodation to the front and a mezzanine level. The building has a total floor area of approximately 1,065sqm. There is a vehicle parking, loading and unloading area to the front of the Site with loading/unloading access through the existing roller shutter doors. There is also a rear access to the property together with an area of open ground to the south west which has been used for car parking. This area is accessed by a private access road which runs along the north eastern side of unit K8 and to the south of units K8 and K7. Unit K5 also has access over the private access road.
- 2.3 The building is of an industrial appearance with a large roller shutter door to the front and some small office windows. The unit has a shallow pitched roof and sits within a row of units of a similar scale but of slightly varying appearance. Whilst the immediate units are of a similar design, the local area is of very mixed design and appearance. The local character is of commercial/industrial development and includes buildings of varying scale and open storage uses.
- 2.4 The Site is located in Flood Zones 2 and 3a and is therefore supported by a Flood Risk Assessment, but is of no other environmental or policy designations.

ii) Planning History

Site History

- 2.5 19760367 - Planning permission granted for the provision of offices and a mess room and the installation of a mezzanine floor for light storage.
- 2.6 19900415 - Planning permission granted for the construction of a single storey extension on both end elevations of existing building for office use.

- 2.7 20220681 - Planning permission refused for the change of use of building to a mixed warehouse and office use together with erection of first and second floor extension and construction of a multi level car park, together with associated earthworks and drainage. The Council's reason for refusal read:

The proposed extension and multistorey car park will result in an incongruous form of development with a terrace of similar industrial units out of character with the surrounding area and appearing dominant from long ranging views.

- 2.8 The applicant subsequently appealed the Council's Refusal of Planning Permission. The Appeal was Dismissed on 14 November 2023; however, the Inspector made the following conclusions:
- The appeal site and surrounding area has a heavily industrialised character.
 - The proposed site would extend above the height of neighbouring buildings; however, visibility is not an indicator of harm
 - The proposals height and mass would sit comfortably on this site and would not cause harm to view of the site from surrounding areas.
 - Operational needs of the appellant's business, the increase in jobs, training opportunities, and the associated economic benefits weigh significantly in favour of the development.
 - Sustainability benefits including improved insulation and benefits associated with demolition weighing moderately in favour of the development.
 - The appeal site falls within an area where employment growth is supported by the Local Plan and the proposal would contribute to local employment.
 - There is evidence of roosting bats within 900m of the Site and therefore the presence of a protected species is a material consideration.
 - The appeal was dismissed on the basis that an assessment of the bat roosting suitability of on-site trees was not submitted within the submitted evidence.

Other Relevant Planning History

- 2.9 An Outline application (planning reference:20221064) has been submitted for a wider regeneration scheme across Northfleet Harbourside, which incorporate the application site. This application is currently pending consideration by Gravesham Borough Council. The Applicant is not party to this wider application and is not supportive of the proposals.

iii) Pre Application Advice

2.10 Pre-application advice was sought from the Council in 2021 in relation to the demolition of the existing warehouse and the construction of a new warehouse with office accommodation above (pre-application reference PRE20210254). The advice is summarised as follows:

- Principle of the development:

Policy CS03 of the Gravesham Local Plan Core Strategy supports the retention of employment uses and the Council will support proposals which expand and support the operation. Development related to employment in this area is therefore acceptable in principle subject to meeting all the other Policies in the adopted Local Plan.

- Design:

The introduction of two additional floors will result in an incongruous form of development, out of character with the terrace of units. Due to its height and appearance it will bear no relationship with the other units and will appear dominant in the street scene. The proposal will therefore conflict with the objectives of adopted policy CS19 and NPPF para 130.

- Neighbouring Amenity:

No Impact

- Highways:

- Greater understanding of how the company operates will be required in order to fully consider the required vehicular parking;
- The application should be supported by a TA and Travel Plan;
- Assessments will be needed to consider vehicle movements of any mobile workforce;
- The Site is complicated by the proposed Ebbsfleet Development and London Resorts proposals which would need to be taken into account as part of any transport/traffic assessment; and
- Applicant is advised to talk to KCC Highways to determine the requirements for the planning application.

3.0 DEVELOPMENT PROPOSALS

i) Overview of the Development Proposals

- 3.1 The development proposes the construction of a first and second floor extension to the existing industrial unit for use as office accommodation, together with associated external changes to the appearance of the building. The existing ground floor would continue to be used as a warehouse. The development also includes the construction of a multi-level car park to the rear of the building which would be accessed through an existing rear access road.
- 3.2 Access into the Site would be provided through the existing access onto Manor Way and is not proposed to be altered.
- 3.3 The development proposals are the same as those included within the previous planning application and subject of the recent planning appeal.

4.0 PLANNING POLICY FRAMEWORK

4.1 The following section of this report identifies the most relevant planning policy and guidance at National and Local level. Generally, only policies relevant to the consideration of this application are included. The proposals are assessed against the relevant policy and guidance on a topic basis in the following section.

4.2 The starting point for the determination of this application is Section 38(6) of the Planning and Compulsory Purchase Act 2004 which requires all applications for planning permission to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance, the development plan includes:

- The Gravesham Local Plan (2014)

i) National Planning Policy Framework

4.3 National policy and guidance is set out in the National Planning Policy Framework (NPPF) (2023).

4.4 The NPPF (para 8) identifies three objectives to 'achieving' sustainable development; economic, social and environmental. These objectives are interdependent and need to be pursued in mutually supportive ways.

4.5 The NPPF sets at the heart of the planning system the presumption in favour of supporting sustainable development. This means securing Development that meets the needs of the present without compromising the ability of future generations to meet their own needs. Sustainable Development is described as comprising three dimensions which include:

- An **Economic** Objective;
- A **Social** Objective; and
- An **Environmental** Objective.

4.6 The NPPF does not change the statutory status of the Development plan as the starting point for decision making. Therefore, to achieve sustainable Development the NPPF directs (para 11) that decision takers should approve Development proposals where they accord with the Development plan '*without delay*'.

- 4.7 Section 4 relates to Decision Taking and requires LPAs to approach decisions on proposed developments in a positive and creative way, working proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Para 38 identifies decision makers should seek to approve applications for sustainable development where possible.
- 4.8 Paras 39-46 focus on the benefits of early engagement and the need to undertake good quality pre-application discussions to facilitate any issues being resolved at pre-application stage.
- 4.9 Paras 55-58 require LPAs to consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations but seeks planning conditions to be kept to a minimum.
- 4.10 Section 6 is entitled 'Building a Strong, Competitive Economy'. Para 81 states planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. It requires significant weight to be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 4.11 Section 9 'Promoting Sustainable Transport' seeks to encourage the planning system to actively manage patterns of growth with significant development to be focused on locations which are or can be made sustainable. Para 108 states planning decisions should ensure there are:
- Appropriate opportunities to promote sustainable travel modes;
 - Safe and suitable access to the site for all users; and
 - Any significant impacts from the development on the transport network or highway safety can be cost effectively mitigated to an acceptable degree
- 4.12 Para 111 states development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe.
- 4.13 Section 14 'Meeting the Challenge of Climate Change, Flooding and Coastal Change' seeks the planning system to support the transition to a low carbon future, taking full account of flood risk and coastal change. Para 152 states the planning system should help to encourage the reuse of existing resources, minimise vulnerability and improve resilience.
- 4.14 Paras 153-169 require new development to be planned for in ways that:
- Avoid increased vulnerability to a range of impacts arising from climate change (para 154);

- Help reduce greenhouse gas emissions (para 155);
- Direct new development to areas with the lowest probability of flooding (para 159);
- Apply a sequential, risk-based approach to the location of development (para 161); and
- Ensure that new developments do not increase the risk of flooding elsewhere (para 167).

4.15 Section 15 'Conserving and Enhancing the Natural Environment' seeks decisions to contribute to and enhance the natural and local environment by:

- Protecting and enhancing value landscapes, geological conservation and interests and soils;
- Recognising the wider benefits of ecosystem services;
- Minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including establishing coherent ecological networks that are more resilient to current and future pressures;
- Preventing both new and existing Development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and
- Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

4.16 Paras 183- 188 seek planning decisions to ensure a site is suitable for its proposed use taking account of ground conditions and any risks arising from contamination. Paragraph 185 confirms planning policies and decisions should ensure development is appropriate for its location taking account the likely effects of pollution on health, living conditions, the natural environment and potential sensitivity of the site or wider area to impacts that could arise from the development. The Development should also sustain compliance with and contribute towards EU limit values taking into account Air Management Quality (para 186).

ii) Local Planning Policy

Gravesham Local Plan Core Strategy (2014)

4.17 The Gravesham Local Plan Core Strategy sets out Gravesham Borough Council's long term spatial vision for the Borough. The Core Strategy covers the period from 01 April 2011 to 31 March 2028 and outlines the strategic objectives for the Borough over this Plan Period.

4.18 Paragraph 1.2.6 identifies that the Core Strategy was developed against a backdrop of national economic uncertainty that has and may continue to affect investment decisions and timing of delivery of development. The Plan sets out that it is vital for Gravesham to plan for growth,

but with flexibility, in order that the Borough can benefit from the economic upturn and prosper during future economic fluctuations.

4.19 At the time of adoption of the Plan, just under half of people living in Gravesham were economically active. Gravesham had high unemployment compared to other areas in Kent, the South East and Nationally. Of those working, high numbers were out-commuting producing a net out flow of 33%.

4.20 Para 2.7.5 of the Core Strategy identified the need to improve the local economy by:

- Improving the skills of the local work force;
- Providing a greater number and variety of jobs; and
- Maximising economic regeneration potential offered by high speed rail services by ensuring a ready supply of good quality sites for economic development.

4.21 The Core Strategy Spatial Vision confirms (para 3.1.1) that by 2028 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. Gravesham's economy will have grown substantially and the skills of its workforce will have improved. The number, quality and diversity of jobs in the Borough will have increased, leading to improved employment opportunities for residents and a reduction in the need to travel outside the Borough for employment (para 3.1.2).

4.22 The Plan includes a number of Strategic Objectives at para 3.2 which include:

- SO1- make the most efficient use of land by concentrating development on underused, derelict and previously developed land in the urban area of Gravesend and Northfleet, in particular former industrial sites along the Thames Riverside and in Gravesend Town Centre and at Ebbsfleet;
- SO3- ensure the right amount, size and type of employment sites are available in Gravesend and Northfleet to diversify and strengthen the local economy and reduce out commuting;
- SO10- safeguard and where possible improve existing employment sites; and
- SO17- increase accessibility, reduce the need to travel, minimise congestion and improve air quality through the improved provision of local public transport and the provision of local jobs and services.

4.23 For the purposes of this application, the most relevant planning policies are:

- 4.24 **CS01- Sustainable Development-** states that when considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained within the NPPF and Core Strategy. It confirms the Council will work proactively with applicants to find solutions which mean that proposals can be approved where possible and to secure development that improves the economic, social and environmental conditions of the area.
- 4.25 **CS02- Scale and Distribution of Development-** This Policy sets out how development will be distributed within the Borough over the Plan Period. The policy seeks to make the most efficient use of previously developed land and focus development in the most sustainable locations. It also reflects local priorities to secure regeneration through the creation of new neighbourhoods and employment along the riverfront.
- 4.26 Table 2 of the Policy includes a Settlement Hierarchy in which Northfleet is identified as a first tier settlement, the most sustainable part of the Borough.
- 4.27 Paragraph 4.2.17 states that the limited size and weakness of Gravesham's economy is key to the rationale for maintaining the area's supply of employment land. At the time of adoption of the Core Strategy, Gravesham was one of the worst performing areas for the number of job seekers chasing every job vacancy, with 12 jobseekers for each vacancy. As such, paragraph 4.2.19 confirms that Gravesham is seeking to substantially diversify and strengthen its economy and reduce out-commuting and seek to enable the delivery of at least 4,600no. new B-class jobs over the plan period. The Council's focus is to ensure that there is sufficient land for B class employment, which includes offices, industrial and storage and distribution uses, and the range of job opportunities this can provide. The greatest capacity for new employment development is identified in the 4no. opportunity areas within the urban area.
- 4.28 The Site is located within the Northfleet Embankment and Swanscombe Peninsula East Opportunity Area in which the Plan anticipated a total of 133,550sqm of B1, B2 and B8 floorspace will be delivered generating a total of 2,270no. jobs.
- 4.29 The wording to Policy CS02 states that the Council's strategy is to prioritise development in the urban area by promoting regeneration and prioritising the redevelopment and recycling of underused, derelict and previously developed land in the urban area. This will be principally through the redevelopment of former industrial sites in the Opportunity areas such as Northfleet Embankment and Swanscombe Peninsula East to create new residential neighbourhoods and employment areas.
- 4.30 **CS03- Northfleet Embankment and Swanscombe Peninsula East Opportunity Area-** The Site is located within one of 4no. identified opportunity areas. These Opportunity Areas have been developed by the Council to establish a broad framework within which development

can take place and an overall vision can be realised. The Core Strategy aims to transform and revitalise previously developed land, strengthen the vitality and vibrancy of Gravesend and create modern, integrated, accessible and sustainable communities which meet the full range of people's needs and aspirations. The Opportunity areas have been recognised not only for the development of the nine key sites during the plan period, but also for the maintenance, improvement and development of adjoining sites as part of a comprehensive approach.

- 4.31 The Site is located in the Northfleet Embankment and Swanscombe Peninsula East Opportunity Area and within sub area 1.2 (Swanscombe Peninsula East Riverside Industrial Area). This area is identified to comprise mainly industrial and port related uses that sit behind the existing tidal flood defences. It is anticipated the area will remain in active employment uses over the plan period. The retention and expansion of industrial and port related employment uses in the area are supported by Policy CS03.
- 4.32 The wording to Policy CS03 identifies that this Opportunity Area is a substantial opportunity for major riverside regeneration in Gravesham. Development will bring significant benefits to existing adjoining residential communities and the Borough as a whole through the delivery of new housing and jobs while achieving environmental improvement, especially in air quality and a high standard of design. For the Swanscombe Peninsula East Riverside Industrial Area, the policy wording confirms the land will be retained in employment use and the Council will support proposals which expand and support their operation.
- 4.33 **Section 5.1** of the Core Strategy relates to Economy, Employment and Skills. Paragraph 5.1.1. identifies that Gravesham's local economy is one of the smallest in Kent. The loss of employment in the lower skilled traditional sectors coupled with limited growth in the higher skilled, professional and office based sectors to replace this loss, together with a lack of well located, modern premises and a generally poorly skilled workforce have constrained local economic growth. This has resulted in a low number of jobs per head of population with significant numbers of people having to travel outside the Borough for employment.
- 4.34 Paragraph 5.1.4 sets out the Council's aims in respect of economic growth and state that the Council aims to:
- Make Gravesham a Place where enterprise can thrive in a sustainable and responsible way;
 - Build on its strengths to increase economic diversity so that the local economy is more adaptable and resilient to change
- 4.35 Paragraph 5.1.6 states the Council will identify sufficient employment floorspace to facilitate the provision of at least 4,600no. new Full Time Equivalent jobs in B class employment by (amongst others):

- Providing for a generous supply of employment sites, to allow market choice and to enable the regeneration of identified sites with appropriate uses;
- Ensuring a range of provision for all employment sectors, to allow firms to start-up, grow and adapt to change;
- Support the expansion of commercial use of the riverside, where it does not conflict with other stated regeneration objectives; and
- Protect existing employment sites

4.36 The wording to **Policy CS07- Economy, Employment and Skills** confirms the Council's commitment to the delivery of 186,940sqm new employment floorspace over the Plan Period. Office development is required to be focused towards Gravesham Town Centre and edge of centre locations, including sites within 500m walking distance of Gravesend and Ebbsfleet Railway Stations. The Policy is also supportive of schemes incorporating small and flexible industrial and/or office workspaces of high quality intended to support start-up and expansion of small and medium sized enterprises. The Council is also supportive of the refurbishment and upgrading of existing industrial and commercial premises and improvements in information and communications technology to facilitate more flexible working practices and the changing economic needs of the Borough.

4.37 **CS11- Transport-** requires new development to mitigate their impact on the highway and public transport networks as required. Transport Assessments and Travel Plans should be provided and implemented where appropriate, to ensure the delivery of travel choice and sustainable opportunities for travel. Sufficient parking is required to be provided in accordance with adopted parking standards, which will also reflect the availability of alternative means of transport and accessibility to services and facilities.

4.38 **CS12 – Green Infrastructure** – seeks to ensure there is no net loss of biodiversity and there where a negative impact on protected species cannot be avoided compensatory provision will be required.

4.39 **CS18- Climate Change-** required new development to:

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- With the exception of previously developed sites along the Thames Riverside, Policy CS18 requires development to be directed sequentially to those areas at least risk of flooding. Proposals in areas at risk of flooding must be accompanied by a Flood Risk Assessment
- Minimise the impact of surface water drainage from new development a waste water systems by requiring SuDS Systems on all developments where technically and financially feasible and that surface water run off from new development has a as a minimum no greater adverse impact than the existing use

- all non-residential developments of 1,000sqm and above to meet the BREEAM 'excellent' standards of water efficiency and include provision for the collection of rainwater
- new development to consider the potential to include proposals for low carbon and renewable energy generation

4.40 **CS19- Development and Design Principles-** requires new development to be visually attractive, fit for purpose and locally distinctive. It will integrate well with the surrounding local area and incorporate sustainable construction standards and techniques. The policy sets out 13 bullet points of design criteria for new development which includes:

- The design, layout and form of new development to be derived from a robust analysis of local context and character and will make a positive contribution to the street scene, the quality of the public realm and character of the area. Account is required to be taken of the scale, height, building lines, layout, materials and other architectural features of adjoining buildings, the wider site context, topography strategic views and features of townscape and landscape value;
- Designed in an inclusive way to be accessible to all members of the community
- Car parking to be well related to the development it serves
- Safeguard the amenity, including privacy, daylight and sunlight of its occupants and those of neighbouring properties; and
- Avoid adverse environmental impacts from pollution, including noise, air, odour, light pollution and land contamination.

iv) Supplementary Planning Guidance/Documents

Kent and Medway Structure Plan 2006 Mapping Out the Future Supplementary Planning Guidance SPG4- Kent Vehicle Parking Standards (July 2006)

- 4.41 Gravesham Borough Council has adopted Kent County Council's SPG4 document to guide the quantum of parking required for non residential developments. The introductory text to SPG4 states that the control of parking at new developments and at extensions to existing buildings is one way of promoting more sustainable forms of transport. Parking also takes up a large amount of space and has a direct influence on the efficiency of land use, the density of development achieved and its cost. The Kent Vehicle Parking Standards are not intended to be restrictive and parking provision will be determined following an assessment of the travel options by all modes of transport that are already available or can be provided.
- 4.42 SPG4 sets out vehicle parking requirements for each use class, and are generally a requirement of 1no. vehicle parking space for a defined quantum of floor space.

5.0 PLANNING APPRAISAL

i) Principle of the Development

Location of the Development

- 5.1 Pre-application advice received from the Council in 2021 confirmed that the Site is located in the Northfleet Embankment and Swanscombe Peninsula East Opportunity Area. Policy CS03 is supportive of the retention and expansion of existing employment uses in this area and therefore the proposals would be acceptable in principle.
- 5.2 The Site has good access to public transport links and therefore offers access opportunities which are not reliant on the private car. The proposals would also bring an existing industrial unit which has sat empty for a considerable period of time back into use. Both of these matters would have a positive benefit and would contribute to the environmental sustainability of the proposals.
- 5.3 The proposals would therefore comply with Policies CS01, CS02 and CS03 of the adopted Core Strategy (2014).

Employment Needs

- 5.4 The adopted Core Strategy identifies that Gravesham has one of the smallest economies in Kent, with high unemployment compared to other areas in Kent, the South East and Nationally. Of those working, high numbers are out-commuting producing a net out flow of 33%. The loss of employment in the lower skilled traditional sectors coupled with limited growth in the higher skilled, professional and office based sectors to replace this loss, together with a lack of well located, modern premises and a generally poorly skilled workforce have constrained local economic growth. This has resulted in a low number of jobs per head of population with significant numbers of people having to travel outside the Borough for employment. Consequently, the Core Strategy places an emphasis on the need to both improve the skills of the local workforce and provide a greater number and variety of jobs.
- 5.5 Gravesham is at an early stage in the preparation of its new Local Plan with a Regulation 18 Stage 2 consultation undertaken in 2020. The evidence base to that consultation is available online and provides an insight into the current economic context given it is more recent than the Core Strategy evidence base; however, the evidence has not been tested through independent examination.
- 5.6 The Economy and Employment Background Paper (October 2020) identifies that the Gravesham Local Economy remains the smallest in Kent with one of the worst job density ratios in England-

the job density ratio for 16-64 year olds remains at 0.58 (i.e. approximately 2 applicants for every job) and is the 23rd worst performing local authority in England. Studies have found that a contributing issue constraining growth and the attraction of inward investment is a lack of modern business premises in good environmental settings close to the strategic road network. Businesses in Gravesham tend to be small, with few major employers and between 2001 and 2011 there was a significant reduction in the proportion of people living and working in Gravesham.

- 5.7 The Background Paper states that the local economy lacks diversity and performs poorly in relation to higher added value sectors. As such, it fails to provide good opportunities for employment and career advancement for local residents which results in significant out commuting to neighbouring districts and London. Progress on the delivery of the ambitions employment land targets has been slow.
- 5.8 Table 18 within the Background Paper offers a position statement in relation to progress made on employment sites as allocated in the Gravesham Core Strategy (2014). For Northfleet Embankment and Swanscombe Peninsula East there has been a significant change to the original plans for the employment component. A residentially lead scheme is currently under construction at Northfleet Embankment East rather than the employment lead development envisaged by Policy CS03. This has lead to a reduction in employment floorspace from 87,550sqm to 21,500sqm. Developments in other opportunity areas have also either stalled or made a significantly reduced contribution to overall floorspace.
- 5.9 As a consequence the Council's Employment Land Needs Assessment finds that the Core Strategy employment land targets have not been delivered and therefore over the new Plan Period (2012-2037) there will be a need to provide between 42,089sqm and 53,748sqm new B1a/b office accommodation.
- 5.10 The Council has also published its Corporate Plan (2019-23). A key objective under the 'Place' heading is to promote a vibrant economy where economic growth and a matching skilled workforce helps to increase the Borough's appeal and prosperity, providing increased local opportunities for residents and a reduced need to travel outside of the Borough for employment. The Corporate Plan states that the Council wants a strong, resilient and productive economy in Gravesham, providing rewarding jobs and incomes for local people.
- 5.11 The Corporate Plan recognises that it is important to create the right conditions for major regeneration and sustainable economic growth which means providing the required space, accommodation and infrastructure to attract investment, enable businesses to grow, developing resilient employability and promoting the Borough as 'open for business'.

- 5.12 The evidence base is therefore clear that there remains to be a strong need for new employment land, particularly office accommodation, to help improve the local economy, boost job growth, reduce unemployment and reduce out commuting. Local Plan Policy together with the Council's wider strategies are strongly supportive of economic development which should weigh strongly in favour of the development proposals.

Benefits of the Proposals

- 5.13 The Site is in the ownership of Jackson Lift Group, a well established company which operates across the UK with existing headquarters in Charlton, London. The Company directly employs 560 people across the UK and operates a successful apprenticeship scheme. Since 1980 the Company has trained 224 apprentices, with 36no. current apprentices undertaking the highest level of NVQ, technician and engineer training.
- 5.14 The Company HQ in Charlton has been developed over the years; however, it is becoming difficult to plan for future expansion due to local availability. The Company has therefore been searching for new premises in a location that would minimise disruption to the business, allow for staff and skills retention, and allow the business to continue to expand.
- 5.15 Northfleet was selected as the preferred location due to the joined up public transport infrastructure and employment catchment area. The site is well connected to both Northfleet and Ebbsfleet railway stations and is a 5-minute walk from the closest bus stop which provides Fastrack and Sapphire bus services. In addition, the London employee base is over 75% sourced from the north Kent area of Bexley, Dartford, Gravesham and the Medway Towns. The relocation of the HQ therefore offers staff opportunities for easier and more cost effective commuting, reduced commuting times and more environmentally friendly public transport options.
- 5.16 Jackson Lift Group has a specific need for a mix of warehouse and office space. This accommodation is not readily available within the Borough and therefore the Applicant has committed to financially investing in upgrading an existing building to provide the required space for themselves. This lack of appropriate accommodation is reflective of what is reported in the Gravesham Economy and Employment Background Paper (October 2020).
- 5.17 The proposals would allow for the establishment of a new HQ for the company to both relocate existing staff and allow for future expansion of the business. The HQ in London currently employs 80 office based staff, the proposals would allow for the expansion over time to accommodate a total of 120no. office staff as the company grows. This would generate an additional 40no. jobs which would provide additional opportunities for local employment and reduce the need to commute out of the Borough to work. The proposals would also provide

warehouse work and act as a base for engineers who commute to sites to undertake their work.

- 5.18 In addition to the jobs directly generated by the development, the proposals would provide employment during the construction phase and indirect value to the local supply chain. This application is supported by an Economic Benefits infographic that illustrates the wider benefits brought about by the proposals.
- 5.19 This type of investment is supported throughout the Council's Adopted Core Strategy, evidence base to its new Local Plan and the Corporate Plan. Supporting the inward investment from an established business with strong links through its workforce to the local area is in accordance with the 'open for business' message and would provide a substantial contribution towards the required employment floorspace which has been stalled elsewhere.

Overall Sustainability

- 5.20 The NPPF (para 8) sets out that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways. These objectives are:
- Economic- helping to build a strong, responsive and competitive economy by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity;
 - Social- supporting strong, vibrant and healthy communities by fostering well designed, beautiful and safe places;
 - Environmental- contributing to protecting and enhancing our natural, built and historic environment, including making the effective use of land, mitigating and adapting to climate change including moving to a low carbon economy.
- 5.21 The NPPF (para 9) requires the 3no. objectives to be delivered through the preparation and implementation of plans and the application of policies in the Framework but highlights that they are not criteria against which every decision can or should be judged. Para 9 also states that planning policies and decisions should guide development towards sustainable solutions but should take local circumstances into account to reflect the character, needs and opportunities of each area.
- 5.22 The contribution that development of the site would make to the achievement of sustainable development is detailed further in the following paragraphs.

5.23 **Economic-** the development proposes the re-use of an existing vacant industrial unit, attracting a new well established business to the local area and creating new skilled office jobs with the following benefits:

- Creation of up to 120no. direct new jobs, with 80no. immediate roles and up to 40no. additional office based roles
- Established apprenticeship scheme with training to the highest level of NVQ, technician and engineering training, offering training opportunities to local residents
- 67 direct and 65 indirect jobs during the construction phase
- Support to local businesses through the use of the local supply chain
- 75% of the existing workforce drawn from the local area
- £9.1m in GVA added to the local economy through on site employment
- Generation of £1.9m business rates per annum

5.24 **Social-** The development proposes the delivery of a well designed building which would enhance the appearance of the area and provide new accessible jobs to local people.

5.25 **Environmental**

- The Site offers good links to the existing public transport network with both rail and bus provision within easy walking distance.
- A significant proportion of staff already live in the local area and commute to London to work. The proposals would therefore reduce the need to travel.
- The Travel Plan also identifies the commitment to delivering a minibus service connecting to the railway station for employees.
- Jackson have also taken a pro-active approach to Carbon Neutrality by reducing building energy consumption. Jackson have certification to ISO14001 (Environmental Management) and ISO5001 (Energy Management).
- The company has started to change the vehicle fleet to electric where possible

5.26 The Inspector attached **significant weight** in favour of the proposal to the operational needs of the appellant's business, the increase in jobs, training opportunities, and the associated economic benefits. **Modest weight** in favour of the proposal was given to the short-term economic benefits during the construction phase, and the sustainability benefits, related to improved insulation and the avoidance of demolition, and use of Travel Plans.

ii) Visual Impact and Design

- 5.27 The NPPF 2023 was amended to include a substantial amendment to Section 12: Achieving Well-Designed Places to elevate the importance of design and its contribution to sustainable development. Paragraph 130 is of particular significance in the consideration of the development proposals, particularly due to its drafting more recently than the adopted Local Plan Policies in the Core Strategy.
- 5.28 Paragraph 130 requires planning decisions to ensure that developments:
- a) Function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - b) Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - c) Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
 - d) Establish or maintain a strong sense of place using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
 - e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
 - f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁴⁹; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.
- 5.29 The NPPF is therefore clear that proposals should have regard to local character and distinctiveness but also contribute to the overall quality of an area, optimising the potential of the site and not preventing appropriate innovation and change.
- 5.30 The development proposes the construction of a first and second floor to an existing warehouse building to create space for office accommodation. The existing building is of limited visual merit and of functional appearance. Its scale and form generally match with the neighbouring units within Building K albeit the materiality of the elevations are different. Units K1-K5 are occupied by a single business and the building's appearance has been updated to allow for that particular use.

- 5.31 The surrounding area is industrial in character and includes a range of building forms, scales and appearance. As an example, to the east of the site is Seacon terminals Limited which hosts large warehouse buildings of a more significant scale and height, there is also open storage at a Discount Builders merchants to the north west and buildings of a significant scale at Britannia Refined Metals to the north.
- 5.32 The proposals would provide a new first and second floor to the building which would mean that the resultant unit would sit higher than the neighbouring industrial units; however, its general form with a pitched roof and use of materials would match in with those within Building K.
- 5.33 The existing buildings add little to the character and appearance of the area, and there is little in respect of overarching character to draw design inspiration from other than a general industrial scale and appearance to buildings and the use of modern cladding.
- 5.34 The proposals would enhance the appearance of the unit, providing a modern high quality finish and re-imagining the older industrial building. The proposals would provide an enhancement to the immediate setting and have the potential encourage further innovative change to other units within the local area, uplifting the overall visual amenity. The proposals would therefore provide enhancements in both the short and long term. The development would allow a maximisation of the use by providing the required office accommodation above the warehouse and meeting the specific needs of the Applicant.
- 5.35 The above notwithstanding, the development proposals would not be highly visible within the wider townscape, with views from the River Thames limited by the existing tall, large buildings on the riverfront. The extended industrial building and its car park would be visible from Galley Hill Road and partially visible from Stonebridge Road; however, would be viewed in the context of the tall overhead power lines, the Ebbsfleet United Football Stadium, and in the context of the wider industrial estate. The buildings are not on the immediate street frontage and would therefore not be visually dominant or intrusive.
- 5.36 The Inspector for the recent Planning Appeal for the Site found in respect of character:

Due to their elevated height, current views from these vantage points look across the roofscape of the range of industrial buildings, and takes in the various industrial paraphernalia described. Consequently, the viewpoints are not sensitive to change, particularly those related to the expansion of industrial operations. Whilst taller than the existing building, the proposal would be seen in the wider townscape which takes in a range of industrial buildings and features of varying scales and therefore would not be out of place within this visual context.

Overall, the proposal's height and mass would sit comfortably on this site and that the proposed additional floors would not harm the contribution the building makes to views of the site from Galley Hill Road or the nearby railway line.

- 5.37 In light of the above, the proposals would provide a benefit to visual amenity, raising local design quality through the use of innovative design and enhancing the character of the local area. The proposals would therefore be in accordance with NPPF para 130 and Policy CS19 of the Core Strategy.

iii) Residential Amenity

- 5.38 There are no residential neighbours in close proximity to the Site to be impacted by the proposed development.

iv) Highways & Access

- 5.39 The Site has a vehicular access from an un-named road which connects to Lower Road to the west. Lower Road passes through Northfleet Industrial Estate and connects with Manor Way to the north. Lower Road connects with the A226 Galley Hill Road/Stonebridge Road to the south of the site via a signalised priority junction. The A226 provides access to Northfleet, Greenhithe, Dartford and to other roads linking to Gravesend.
- 5.40 The Site is well located in relation to public transport links with bus stops situated on Galley Hill Road, approximately 300m south west of the Site and connect to Dartford, Bluewater, Northfleet, Swanscombe and Gravesend together with other surrounding villages and housing areas. There is also good access to the rail network, with Northfleet railway station located 900m to the south of the site (12 minute walk) and Ebbsfleet International Station 1.2km away (15 minute walk).
- 5.41 The existing Site has 2no. parking spaces to the front of the Site together with an area for larger vehicles to undertake deliveries. There is an open area of land to the rear which is currently unused. The development proposes the retention of the existing front forecourt parking area together with the creation of a new multi level car parking area on land to the rear of the Site to provide a total of 66no. on site car parking spaces (64no. in the multi level car park and the retention of the 2no. forecourt spaces). The servicing of the building would also remain as per the existing situation. A total of 20no. cycle parking spaces are also to be provided which is an enhancement upon the existing zero dedicated provision.

- 5.42 The supporting Transport Assessment considers the development proposals against adopted maximum parking standards, together with considering existing parking stress should parking from the development occur on local roads. It also reviews the evolving context in relation to the Gravesham Council's Climate Change Strategy (December 2021) and more recent work on parking requirements undertaken by the neighbouring Local Planning Authority, the Ebbsfleet Development Corporation. The general presumption being that parking levels should be reduced to encourage more sustainable methods of travel to occur.
- 5.43 The Site is located with excellent access to the public transport network which connects across Kent and into London. A considerable number (75%) of staff commute from Kent from the existing Head Office location in Charlton and there is therefore an opportunity to reduce commuting and encourage staff onto public transport to commute to work. The application is also supported by a draft Travel Plan which includes further measures, including a proposed minibus service to the railway station(s), to encourage the use of public transport.
- 5.44 The development would result in a minor increase to traffic on the surrounding network in the weekday peak hours and over a typical weekday; however, the proposals would not cause an unacceptable impact on highway safety, or have a severe residual cumulative impact on the road network.
- 5.45 The development would therefore comply with Core Strategy Policy CS11, KCC Supplementary Planning Guidance 4 (which sets out maximum parking standards) and the NPPF Section 9: Promoting Sustainable Transport.

v) Flood Risk

- 5.46 The Site is located in Flood Zone 3a; the application is therefore supported by a Flood Risk Assessment (FRA) to consider the potential flood risk to the proposed development and impact of the development upon flood risk off site.
- 5.47 The development proposes an extension to an existing building and therefore it is not necessary to apply the Sequential Test as part of the FRA. The development proposals are for a 'less vulnerable' use in flood zone 3a, for such a combination of vulnerability classification and flood zone the Exception Test is also not applicable.
- 5.48 The FRA appraises the risk of flooding across a wide range of sources. The only source of potential flooding identified is from the River Thames. The Site benefits from existing flood defence infrastructure and therefore it is only in the extremely unlikely event that the defences fail that the Site could be subject to flooding. The FRA therefore recommends the occupants sign up to the EA's Early Flood Warning Service and that flood resilience measures are

incorporated into the design of the building to minimise the impact of a flood event. This notwithstanding, should a rapid flood occur and occupants are unable to evacuate, there is safe refuge in the office accommodation which will be located above the maximum predicted flood level.

- 5.49 The FRA includes a surface water management strategy for surface water runoff generated by the development proposals. All surface water can be managed by the proposed SuDS and reduce the proposed discharge rate by a minimum of 50% when compared to existing discharge rates.
- 5.50 The proposed development would therefore not be at unacceptable risk of flooding or increase flood risk elsewhere, minimising the surface water runoff from the existing situation. The proposals would therefore comply with Core Strategy policy CS18.

vi) Ecology

- 5.51 The Site is located approximately 225m south of an area of woodland and parts of the Swanscombe Peninsula Site of Special Scientific Interest (SSSI) are close to the site. Surveys carried out in the SSSI have recorded roosting bats within 900m of the site and as a result, the trees on site have the potential to support roosting bats.
- 5.52 The previous planning application was not supported by survey work to assess the bat roosting suitability of on-site trees. As such, despite not being a reason for refusal of the previous planning application, the Inspector found that without such an assessment it was not possible to confidently ascertain that there are no bats roosting within the Site. The proposals were therefore considered to be contrary to Gravesham Local Plan Policy CS12 and the NPPF paragraphs 174 and 180.
- 5.53 In response, the Applicant is undertaking bat survey work to assess whether there are any bats on site and any appropriate mitigation required to overcome this reason for the Appeal being Dismissed.

6.0 SUMMARY & CONCLUSIONS

- 6.1 Section 38(6) of the Planning & Compulsory Purchase Act 2004 (the "2004 Act") confirms that, where planning applications are to be determined in accordance with the Development Plan unless material circumstances dictate otherwise.
- 6.2 The Site is located in the Northfleet Embankment East and Swanscombe Opportunity Area. Policies CS01, CS02 and CS03 are supportive of the retention and expansion of employment uses in this location. The proposed development is therefore acceptable in principle.
- 6.3 The adopted Core Strategy and emerging evidence base to support the new Local Plan identify considerable issues with the local economy which lacks diversity, fails to provide good opportunities for employment and career advancement and performs poorly in relation to higher added value sectors. The focus of both adopted policies and wider corporate strategies is therefore to foster and create the right conditions for major regeneration and sustainable economic growth, providing the required space, accommodation and infrastructure to attract investment and enable businesses to grow. This should be afforded significant weight in the determination of applications relating to economic development.
- 6.4 The development proposals would provide for inward investment by an established company with national reach to create a new HQ. Investing in the refurbishment and enhancement of an existing building to create bespoke accommodation to meet their needs in the long term. The proposals would create direct and indirect jobs, apprenticeship and skills training opportunities, GVA and business rates to boost the local economy. The proposals would also make a significant contribution to the provision of new employment floorspace and job growth in the desired office based sector where this has stalled elsewhere. Therefore, the development would positively contribute to the objectives of the Core Strategy and Corporate Strategy. This should weigh strongly in favour of the proposals.
- 6.5 The Site is located in an established industrial area. The area contributes little to the overall character and appearance of the Borough. The surrounding area includes a range of building forms, scales and appearance and there is little in terms of overarching character to draw design inspiration from. The proposals would improve the appearance of the unit, providing a modern high quality finish and re-imaging the older industrial building. This would provide an enhancement to the immediate setting and has potential to encourage further innovative approaches to other units in the surrounding area. The proposals would therefore be in accordance with Policy CS19 and NPPF para 130.

- 6.6 The planning application is supported by a suite of technical reports which demonstrate the proposed development does not give rise to any significant or harmful environmental impacts. These include parking and highways, flood risk and contamination.
- 6.7 A Bat Survey will be provided alongside this application to assess the bat roosting potential of the on-site trees and proposing any required mitigation, satisfying the Inspector's concerns regarding insufficient assessment on protected species.
- 6.8 In relation to the overall planning balance, the Inspector attached significant weight to the long-term economic benefits of the scheme, modest weight to the sustainability benefits of the proposals, the moderate scale of the development, the Site's accessible location and the applicant's commitment to a Travel Plan. He also dismissed the Council's concerns regarding design and landscape impact on the surrounding area, concluding that the proposal would not harm the contribution the building makes to views of the site from Galley Hill Road or the nearby railway line which constituted the Council's Reasons for Refusal.
- 6.9 Therefore, following a thorough assessment of the proposals against current and emerging planning policy guidance, it is concluded that the proposals represent an acceptable form of development, positively contributing to the local economy and the visual appearance of the local area and overcoming the reason for Dismissal of the planning appeal. As such the proposals should be supported and planning permission granted.