

PLANNING STATEMENT

SITE ADDRESS: Land at Dalefield Way (East), Gravesend, DA12 2FL
DATE: July 2025



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Executive Summary

This statement has been prepared by Total Planning on behalf of O'Halloran & O'Brien (The Applicant) to support a planning application for use of the land for open storage (B8 use) of construction related equipment and operations related to Dalefield Way Industrial Park with associated installation of hardstanding/surface treatment.

This submission also includes the following documentation in support:

- Site Location Plan
- Proposed Site Layout
- Design and Access Statement
- Transport Assessment
- Geo-Environmental Phase 1 Report
- Preliminary Ecological Appraisal
- Air Quality Assessment
- Flood Risk Assessment and Drainage Strategy
- BNG Assessment and Statutory Metric (Excel Format available)
- CIL Form 1

This statement should be read in conjunction with these supporting documents and information.

There is Local Plan and national support for making more efficient use of sustainable, underutilised land that are in sustainable and accessible locations to deliver sustainable economic and job growth in employment locations.

In this particular case and given the nature of surrounding construction related businesses, the specific need at this location is the growth and expansion of open storage primarily for construction vehicles/equipment and construction related operations. Given local and national adopted policy and that the site is allocated for employment uses and specifically B8 storage, the principle of using this land for open storage should be supported and is compliant with policy.

The proposals are well located in relation to local public transport facilities and can be readily accessed both on foot and by bicycle from the nearby residential areas that it will serve. At the same time vehicular access to and from the site is good, and well able to serve the nature of the use being proposed, while traffic impacts on the local road network – and in particular Lion Roundabout – will also be within acceptable levels.

The scheme will also ensure that the site will not be at risk of flooding, and will not impose additional flood risks elsewhere within the catchment, while adverse impacts on the landscape or ecology of the area will also be limited, and with suitable mitigation can prove to have a positive impact overall in an area that is currently of little merit in these terms.

The scale, amount and nature of the proposals are such that there would be no adverse impact upon the amenity of nearby properties or the surrounding area, and the scheme can be designed to provide a high quality development.

Overall, the approach to this development would reflect the 12 core principles of sustainable development as set out in the NPPF. The application scheme meets the strategic policy objectives of the Local Plan and should be granted planning permission.

The Site

The site is currently vacant land, designated as a key employment site within the Gravesend Local Plan Core Strategy (2014). It lies within the same ownership as the existing industrial park, which currently accommodates plant hire and construction companies and was recently granted consent for an additional office building and storage unit (App Ref: 20240199).

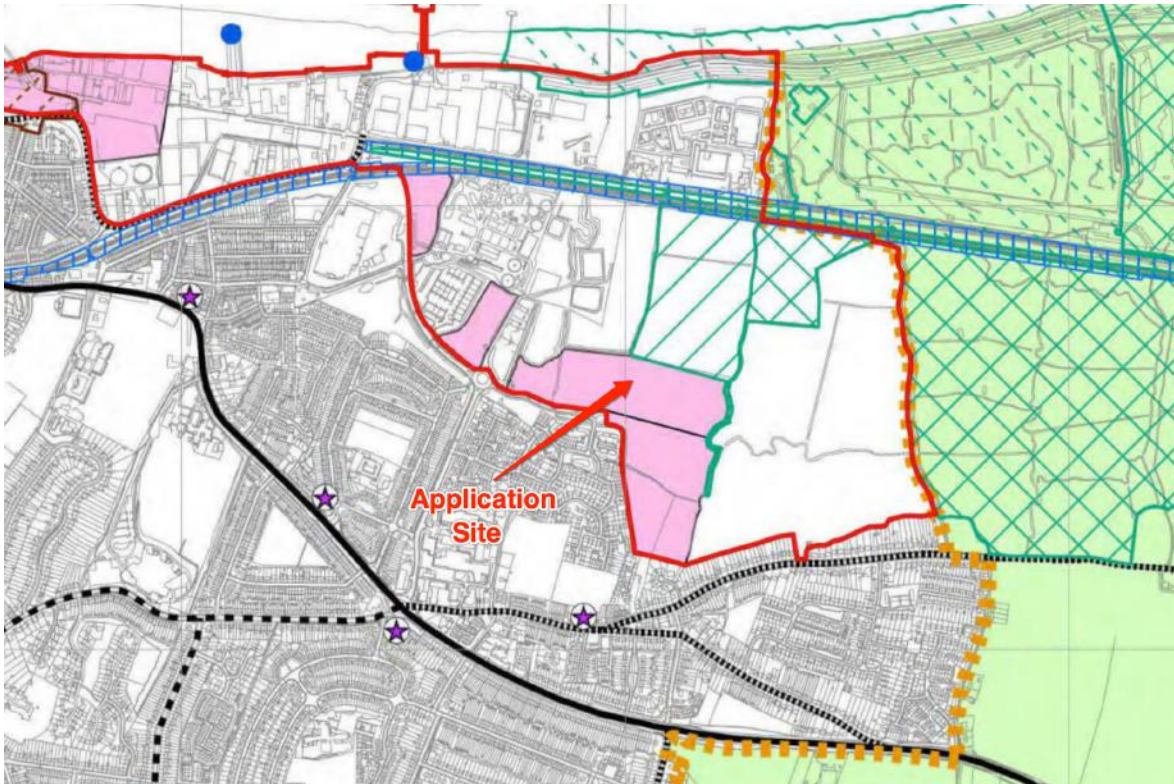
The applicant currently accesses the site using the existing gated access, located at the eastern end of Dalefield Way approximately 160 metres to the east of the Dalefield Way Industrial Park access. This is an informal access and would be formalised as part of this planning application. Access to the existing industrial park will be retained from Dalefield Way via the existing site access junction.

The location of the site is shown on the site location plan that accompanies this application and the site is shown in the aerial image below.



Aerial Image of the site

In terms of land use designations, the application site is designated in the Gravesham Local Plan Core Strategy Policies Map (2014) (See below) as a Key Site and an Opportunity Area. No other designations are relevant to the site.



Gravesham Local Plan Core Strategy Policies Map (2014)

The site is also situated within Flood Zone 3 which is an area at highest risk of flooding.

Proposed Development

This application seeks formal planning permission for use of the land for open storage (B8 use) primarily for equipment and operations related to Dalefield Way Industrial Park (B8 use) with associated installation of hardstanding/surface treatment, security fencing/gates, access, a soft landscaping mound, and erection of temporary office cabins.



Application site as viewed from Dalefield Way leading into the site

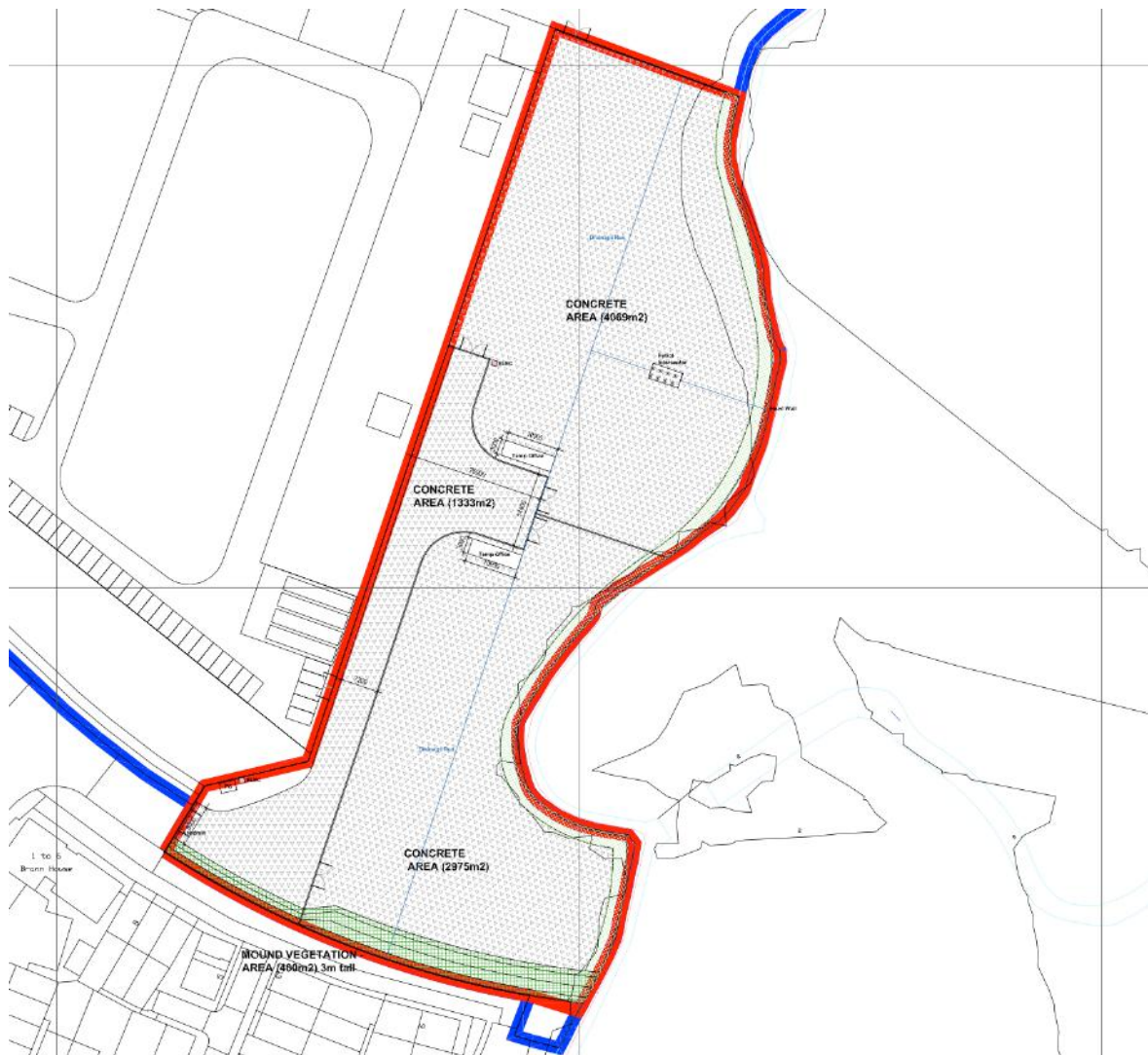
As demonstrated in the photograph above, the site already benefits from having a secure boundary fence and a gated entrance.

The proposals include some additional hardstanding to facilitate movement into and out of the site and general manoeuvring within it. There will be 3 separate areas where concrete will be used comprising an inner access road which will include a 'T' junction within the site measuring 1,333m²; a storage area on the northern side of this 'T' junction measuring 4,069m²; and a storage area on the southern side of this 'T' junction measuring 2,975m².

Security fencing/gates of a nature and style of the existing fencing/gates seen in the photograph above will be erected to delineate between these areas within the site. Details of this fencing could be secured by condition.

In addition, 2 temporary office cabins will be positioned relatively centrally within the site and can be seen in the proposed site plan below. These cabins will have the style and appearance of converted shipping containers but more details could be secured by the Council by means of a planning condition.

The pavement at the end of Dalefield Way will also be extended into the site.



Proposed Site Plan

Planning History

In 2013, the site formed part of a larger application site which was granted outline consent for "...the use of land for industrial purposes (Use Class B2/B8) comprising 7,000 sq. metres floor space together with associated extension of Dalefield Way, new site access with related parking and circulation space, landscaping scheme and associated flood accommodation works" (App Ref: 20100436).

This included the existing Dalefield Way Industrial Park, which was granted consent in 2016 for the "Erection of 3 industrial units (Use Class B1/B2 and B8) with site access, related parking and circulation space" (App Ref: 20160314). The consented scheme equates to approximately 3,479 Sq. metres of floor space across three buildings, although the larger c. 2,000 Sq. m manufacturing plant was not brought forward in its entirety.

More recently, in 2024, consent was granted for the development of a new three storey office building (1,170 Sq. m) and storage unit (234 Sq. m) within the existing Dalefield Way Industrial site. This was for the *'Erection of a new three storey office building, for use Class E and installation of solar panels to roof. Erection of a single storey storage building with integral roof lights, for use Class B8 and associated parking and landscaping'* (App Ref: 20240199).



Planning Permission ref: 20240199

The 2024 consented scheme was supported by a TS and Draft Travel Plan produced by DHA Planning.

The scope of the TS was agreed following pre-application engagement with KCC Highways and National Highways, and included details on the existing conditions, proposed development details and access arrangements, as well as the proposed trip generation associated with the proposals. KCC Highways had no formal objection to the proposals, and there were no local concerns in relation to the operation and/or safety of the surrounding highway network to consider. The LHA stated that they "...do not consider the level of traffic generation is significant enough to require modelling of any local road junctions". The LHA's recommendation was subject to three pre-commencement conditions which were included in the Decision Notice, relating to the provision of a Travel Plan, provision of the proposed car parking spaces and provision of cycle parking facilities.

The 2024 consented scheme will result in the loss of existing yard space within the Dalefield Way Industrial Park, which is therefore being relocated into the proposed open storage which forms this application alongside new open storage space to the West of the main site.

With no objections or concerns in relation to traffic and transport matters associated with the 2024 proposals, it is considered that there should not be any concerns in relation to the relocation of goods and plant to the proposed open storage site.

Planning Policy

The proposed development would be assessed against the Development Plan Policies contained within Gravesham Local Plan; the NPPF and supplementary planning guidance.

NPPF

At the heart of the NPPF is a *'presumption in favour of sustainable development'* (Para. 11). The NPPF assumes that where development can be demonstrated as being sustainable, in economic, social and environmental terms and where it is in accordance with the Development Plan, Local Authorities should approve it without delay.

The NPPF has a strong emphasis on both building a strong competitive economy and supporting sustainable growth. The NPPF specifically outlines the Government's commitment to securing economic growth in order to create jobs and prosperity, building on the country's strengths and to meet the challenges of global competition and a low carbon future. Paragraphs 7 & 8 of the Framework is particularly relevant to this application to extend the life of commercial schemes:

"The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs⁴. At a similarly high level, members of the United Nations – including the United Kingdom – have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection⁵

Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- a) an economic objective – to help 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; and by identifying and coordinating the provision of infrastructure;"*

In addition, chapter 6 'Building a strong, competitive economy' and specifically Paragraph 85 states:

"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. 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. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential."

Furthermore, Paragraph 87 of the NPPF states that:

"Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for:

- b) storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation*
- c) the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience.”*

Gravesham Local Plan Core Strategy and Development Plan

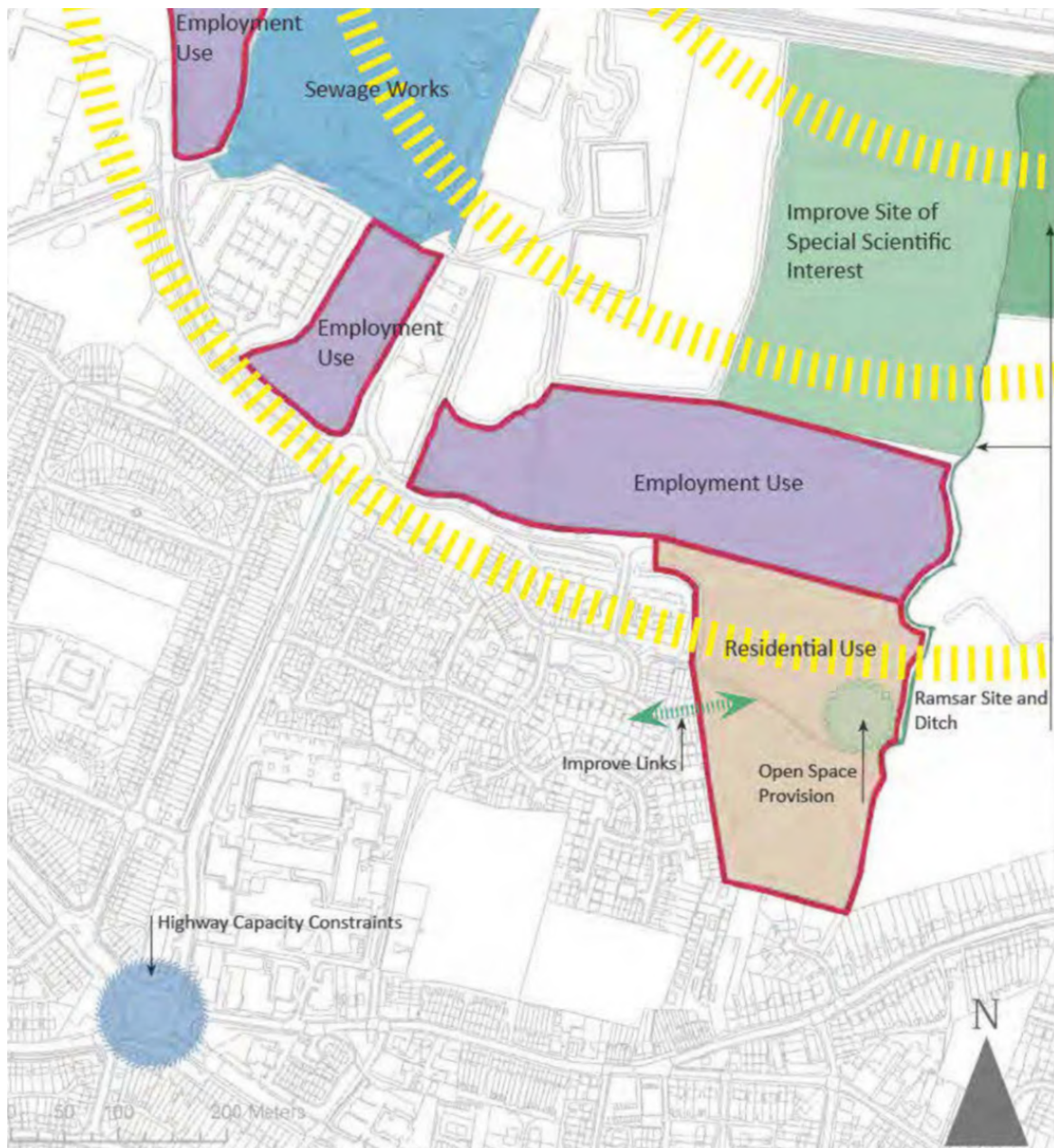
Gravesham Borough Council adopted its Core Strategy and Policies Map on 30 September 2014. This Plan has replaced and/or superseded many of the policies contained in the Gravesham Local Plan First Review 1994. In September 2007, the Secretary of State issued a direction on policies to be saved and deleted. The policies in the List of Saved Policies (Appendix 1) of the Local Plan Core Strategy 2014 are the remaining operational policies (in part or whole).

The application site is part of one of the key sites, which form a wider opportunity area within the Borough to establish a broad framework within which development can take place. The Council has identified the greatest capacity for new employment development within the opportunity areas. The approved proposal therefore offers a great opportunity to meet the business needs within the Gravesend Riverside East and North East Gravesend Opportunity Area.

Policy CS01 of the Council's Core Strategy states that the Council, when considering development proposals, will take a positive approach that reflects the presumption in favour of sustainable development with regard to the NPPF. The application should therefore be dealt with promptly on the basis that it accords with the policies in the development plan.

Policy CS04 Gravesend Riverside East and North East Gravesend Opportunity Area will be the subject of riverside regeneration complemented by additional development to the south of the railway which improve the poor urban environment and make the most efficient use of vacant, derelict and underused land in the area. This will comprise a mix of uses including new housing, jobs and supporting development.

Policy CS04 clarifies that a number of areas that make up the North East Gravesend Regeneration Area Key Site will deliver around 130 dwellings and around 17,570 sq m gross employment floorspace within use classes B1, B2 and B8.



Key Site North East Gravesend Regeneration Area Schematic Plan

Policy CS07 Economy, employment and skills of the Core Strategy supports policy CS04 in the delivery of economic and employment growth.

Policy CS11 Transport of the Core Strategy states that new developments should mitigate their impact on the highway and public transport networks as required. As appropriate, transport assessment and travel plans should be provided and implemented to ensure the delivery of travel choice and sustainable opportunities for travel. Transport assessment work is required to be undertaken in accordance with national and local policy guidance, and to identify detailed highway and public transport network requirements and management arising from the development.

Policy CS12 Green Infrastructure of the Core Strategy protects sites designated for their biodiversity particularly within nationally designated Sites of Special Scientific Interest and it encourages opportunities to enhance habitats.

Policy CS19 Development and Design Principles of the Core Strategy states that new development will be visually attractive, fit for purpose and locally distinctive. It will conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anti-crime standards. The design and construction of new development will incorporate sustainable construction standards and techniques, be adaptable to reflect changing lifestyles, and be resilient to the effects of climate change.

Principle of Development

The site is allocated for employment use both through its Key Site and Opportunity Area allocations (CS04 of the Core Strategy) and these support the delivery of B2 and B8 (storage) uses on this land.

As discussed in the planning history section of this statement, the need for this open storage use (B8 use) is driven in part by a recent consent (Ref: 20240199) within the main Dalefield Way Industrial Park which replaced a previous yard area that was used for open storage utilised by neighbouring businesses adjacent to it.

Paragraph 85 of the NPPF is very specific that:

“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. 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. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.”

There is significant local need for open storage by O'Halloran & O'Brien and the associated neighbouring businesses and this consent would help create the conditions in which these businesses can invest, expand and adapt. This will clearly support economic growth and productivity taking both account of local business needs and wider opportunities for development.

Furthermore, Paragraph 87 of the NPPF states that:

“Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for:

- a) storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation*
- b) the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience.”*

In this particular case and given the nature of surrounding construction related businesses, the specific need at this location is the growth and expansion of open storage primarily for construction vehicles/equipment and construction related operations. However, the site is expected to be used for various storage related activities (B8 use). Given local and national adopted policy and that the site is allocated for employment uses and specifically B8 storage, the principle of using this land for open storage should be supported and is compliant with policy.

Transport

Policy CS11 Transport of the Core Strategy states that new developments should mitigate their impact on the highway and public transport networks as required.

This application has been supported by a Transport Statement demonstrating that the proposal would be acceptable with regards to impact on the transport network. This report should be read alongside this statement.

The application site is located within vacant employment land to the east of the existing Industrial Park and Dalefield Way. The site benefits from an existing gated access off Dalefield Way, which has been used informally for some time to access to the applicant's wider land parcels which include the site.

The proposals comprise the construction of an open storage facility to accommodate the existing operations related to the existing Dalefield Way Industrial Park. The site will include two hardstanding areas, as well as a new access road connecting to the eastern extent of Dalefield Way.

The open storage space will be used to store construction materials and plant machinery currently stored within the main site, allowing the main site to operate more efficiently and safely within the overall ownership boundary. The recently consented office scheme will also reduce yard space within the main site, which will be replaced with the open storage space within the application site.

Access to the site will be obtained from the existing gated access located at the eastern end of Dalefield Way, located approximately 160 metres to the east of the main site access. This access would be upgraded and formalised to appropriately connect to the existing carriageway.

The upgraded junction, and internal access road can accommodate up to a 16.5m long articulated vehicles, which are likely to be the largest vehicles accessing the site. The majority of vehicles will be smaller than this, for example 10m long rigid HGVs, box vans, plant machinery and fork lift trucks.

The site is situated in a sustainable location, with good walking and cycling links connecting the site to the surrounding residential areas. The site also has good links to public transport services, with local bus stops located within a suitable walking distance, which also provide access to Gravesend Rail Station. As such, these sustainable travel options provide an attractive and realistic alternative to car travel. The operator will also encourage sustainable travel as well as car sharing amongst the staff, as part of travel plan measures attached to the existing Dalefield Way Industrial Park.

Road safety data has been analysed and there is no evidence of a highway safety issue within the vicinity of the site which would be exacerbated by the proposals.

The proposals will provide open storage, which would replace the existing storage space on the main site and enable the overall site to be used more efficiently and safely. As such, some vehicle deliveries would still be made to the main site, and some would be transferred to and from the upgraded access at the eastern end of Dalefield Way into the open storage.

The proposed open storage will not provide any facilities for staff and visitors (i.e. welfare or parking) and as such, they will continue to access and egress the main site, and there will be no additional vehicle movements associate with these users, and no additional staff are likely to be employed on the overall site as a result of the open storage use.

As essentially an extension of the existing operations, the proposals would not have a material impact on the operation of the highway or an unacceptable impact on highway safety.

The site location offers a choice of travel options and the proposal represents sustainable development in line with the requirements of the NPPF.

The development will not have a severe impact on the operation of the surrounding highway network, or an unacceptable impact on highway safety, in accordance with the NPPF. It is therefore considered that there are no reasons relating to transport or highways for objecting to the application.

Contamination/Ground Investigation

This application is supported by a Geo-Environmental Desktop Study prepared by Manhire Associates Consulting Engineers. This report should be read alongside this statement. The geo-environmental report has investigated the past and present usage of the area of land at Dalefield Way (west), Gravesend. The purpose of the study was to conduct a visual appraisal of the site and its immediate surroundings and to research available data with reference to geotechnical or environmental constraints that may impinge upon the client's proposed development.

The study comprised of a walkover survey followed by examination of historic map records. In addition, searches were made of various databases held by the Environment Agency and others. The information obtained from these sources is summarised herein. In summary, it is considered that previous activities on and around the site represent a low risk of significant or widespread contamination.

The information obtained during this assessment has indicated there to be a low risk of significant or widespread contamination from on-site uses based on current and historic records. Off-site uses also present a low risk of significant or widespread contamination.

It is recommended that a detailed intrusive investigation is carried out which will include an allowance for contamination sampling and testing. Therefore, subject to an appropriate condition, the proposal is not considered to lead to any risk to future users from contamination or any other adverse impacts.

Flood Risk Assessment / Drainage

Given the location of the application site within Flood Zone 3, a Flood Risk Assessment (FRA) with integral preliminary Drainage Strategy prepared by Manhire Associates Consulting Engineers. This report should be read alongside this statement.

A review of the existing Flood Risk Assessments for the site from 2007, 2011 and Addendums from 2011 and 2016 concluded that the existing flood defence infrastructure and alignment of the railway line provide an adequate level of flood defence for the residential and industrial proposals up to 2055. Consequently, the industrial element is considered to be safe throughout its design life.

As part of the Flood Risk Assessment prepared by Ardent Consulting Engineers in January 2007 & 2011 to support the planning application for consent to implement the Phase 2 industrial development scheme a surface water drainage strategy was devised to demonstrate that the scheme can be suitably implemented without increasing the level of flood risk when the drainage system experiences a 1:100 year rainfall event (including an additional 30% for any potential climate change impact).

Surface Water run-off from the site will freely discharge into the receiving open channel watercourses and the flows controlled to an agreed Greenfield rate of 32.20 litres/sec by the existing devices that were previously installed to the north of the application site (adjacent to the railway line).

Sufficient on-line attenuation has been provided in accordance with the previously agreed strategy by excavating on-line flood levees to accommodate the volume of surface water run-off generated by the development scheme when subjected to a 1:100 year event (including climate change) to provide a maximum volume of 1,905m³.

The site is presently drained by a series of surface water networks which discharge into the watercourse and flood levee corridors.

The introduction of 8,377m² of concrete surfacing will have no adverse impact on the existing watercourses and flood levee corridors.

Run-off from the new concrete areas will connect into the existing drainage ditches currently installed and discharge into the flood levee corridors as originally proposed.

The overall conclusion of the FRA that accompanies this application is that the overall flood risk is within the terms and requirements of National Planning Policy Framework.

Ecology and Biodiversity

A Preliminary Ecological Appraisal has been submitted in support of this planning application. It finds that the habitats are of low ecological value and that potential for protected species to be present on site is also minimal.

The proposal does not require significant construction works to be undertaken and lighting does not form part of these proposals.

A BNG assessment and metric prepared by ACJ Ecology also accompanies this application which should be read in conjunction with this statement.

Based on their survey of the site, the proposal indicates that a biodiversity gain in area based habitat units of +1,78 is required to achieve the Biodiversity Net Gain. Hedgerow units have been achieved. However, habitat units will need to be purchased from a biodiversity offsetting provider to achieve the NPPF 10% net gain required. Subject to a condition to secure this, the development would be considered to comply with the NPPF with regards to achieving a 10% net gain.

Air Quality

An Air Quality Assessment has been prepared by Millar Goodall in support of this application which should be read in conjunction with this statement.

It concludes that the health impacts during construction phase of the development will be minimal and mitigated against. The implementation of these will ensure that residual dust impacts during the construction phases are not significant. In addition, concentrations of NO₂ are likely to be below the short term objective at the proposed development site, which therefore considered suitable for its intended use with regards to air quality.

Overall, the proposed development is not expected to have a significant effect on local air quality.

Impact on visual and residential amenity

The scale, amount and nature of the proposals are such that there would be no adverse impact upon the amenity of nearby properties or the surrounding area, and the scheme can be designed to provide a high quality development. None of the fencing would be higher than 2m in height and the temporary cabins would be single storey and situated away from the boundaries of the site.

Conclusion

In conclusion, there is Local Plan and national support for making more efficient use of sustainable, underutilised land that are in sustainable and accessible locations to deliver sustainable economic and job growth in employment locations.

In this particular case and given the nature of surrounding construction related businesses, the specific need at this location is the growth and expansion of open storage primarily for construction vehicles/equipment and construction related operations. Given local and national adopted policy and that the site is allocated for employment uses and specifically B8 storage, the principle of using this land for open storage should be supported and is compliant with policy.

The proposals are well located in relation to local public transport facilities and can be readily accessed both on foot and by bicycle from the nearby residential areas that it will serve. At the same time vehicular access to and from the site is good, and well able to serve the nature of the uses being proposed, while traffic impacts on the local road network – and in particular Lion Roundabout – will also be within acceptable levels.

The scheme will also ensure that the site will not be at risk of flooding, and will not impose additional flood risks elsewhere within the catchment, while adverse impacts on the landscape or ecology of the area will also be limited, and with suitable mitigation can prove to have a positive impact overall in an area that is currently of little merit in these terms.

The scale, amount and nature of the proposals are such that there would be no adverse impact upon the amenity of nearby properties or the surrounding area, and the scheme can be designed to provide a high quality development.

Overall, the approach to this development would reflect the 12 core principles of sustainable development as set out in the NPPF. The application scheme meets the strategic policy objectives of the Local Plan and should be granted planning permission.