

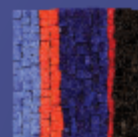
Planning Statement

**Erection of a Surface-Mounted Industrial
Storage Building Anchored to Existing
Hardstanding.**

**Severn Drive
Tewkesbury
GL20 8SF**

Hydro Building Systems UK Ltd

SEPTEMBER 2023



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Version:	Submission.
Date of Issue:	18th September 2023

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1 Introduction

- 1.1 This Planning Statement accompanies a full planning application for the erection of a surface-mounted ancillary industrial storage building anchored to existing hardstanding on Severn Drive, Tewkesbury on behalf of Hydro Building Systems UK Ltd (Hydro).
- 1.2 This statement considers the site and its surroundings and summarises the planning policies which are material to the proposal, along with further guidance and evidence which has been considered.
- 1.3 The analysis addresses all the issues which we consider to be relevant to the determination of the planning application. It concludes that planning permission should be granted, having regard to the development plan and other material considerations.
- 1.4 This statement should be read in conjunction with the following plans and documents:
 - Location Plan (Ref: HYD - TRI - ZZ - 00 - DR - A - 3000)
 - Proposed Site Plan (Ref: HYD - TRI - ZZ - 00 - DR - A - 3001)
 - Proposed Warehouse (Ref: HYD - TRI - ZZ - 00 - DR - A - 3002)

2 The Proposals

2.1 The application description is as follows:

“Erection of a surface-mounted ancillary storage building anchored to existing hardstanding”.

2.2 Hydro Building Systems UK is part of the Hydro Group, a global company which extrudes, smelts and recycles aluminium to provide high value-added solutions. The Tewkesbury site handles the production and storage of aluminium door, window and curtain walling products.

2.3 The site’s standard operating hours are 06:00 - 22:00 Monday to Thursday, and 06:00 - 19:00 Friday, subject to variation where necessary. There will be no change to these hours of operation as a result of the development.

2.4 There are 80 full-time employees at the development site. This number will also remain unaffected by the development.

2.5 The company has identified a clear and urgent need for sheltered storage space for raw aluminium extrusion bar lengths to protect against weather damage. These are currently stored externally and is wrapped in thick plastic covering to protect against damage from rain and direct sunlight exposure.

2.6 The area of existing hardstanding where the proposed building will be located is currently used for external storage of the extrusion bar lengths. The proposed building will make more efficient use of this space by allowing a greater volume of goods to be secured in the same footprint and providing weather protection. The building will also improve working conditions on site for employees by providing a dry, protected area to access goods from.

2.7 The proposed warehouse building is composed of three adjoining structures. Dimensions of the proposed building as a whole are as follows:

Internal

- 50.2m length x 40.0m width
- GIA: 2,008 sqm

External

- 50.5m length x 40.1m width x 5.2m height (eaves) / 8.2m height (ridge)
- GEA: 2,025 sqm

- 2.8 The building will be anchored to the existing hardstanding using shallow chemical anchor bolts and will not physically adjoin with any existing structures. As such, no intrusive groundworks, drainage or foundations will be required for the erection of the building.
- 2.9 The building will be constructed from light grey single sheet steel walls and a translucent-white PVC-coated polyester roof. The building will be accessed via the entire north-facing elevation which will be open-sided, as well as a pedestrian door and a roller shutter door to the south-facing elevation enabling access for vehicles and pedestrians from both sides.
- 2.10 There is provision for parking of 201 vehicles on site (171 cars, 4 disabled bay, 20 bicycles, 6 motorcycles). This level of parking will not be impacted by the development.
- 2.11 Vehicles including HGVs access the site directly off Severn Drive to the west. As the area where the building will be located is currently used for external storage, there will be no impact on access routes or manoeuvrability within the site.
- 2.12 The design, materials, and prefabricated method of construction of the building will ensure a quick delivery and erection. This will minimise disruption to existing operations and allow the company to rapidly address its need for additional sheltered storage space.

3 Site and Surroundings

- 3.1 The application site is a 0.75ha plot of land comprised entirely of existing hardstanding which serves as yard area to the south of the company's main warehouse building. This yard area is used for access routes within the site and as an external storage area.
- 3.2 The wider site comprising Hydro's premises is bound by a group of business park style offices and small businesses to the south, by Severn Drive to the east which separates the site from several similar units as well as larger industrial units, to the north by a large bathroom product manufacturing facility and to the west by the M5. The site's surroundings are predominantly industrial in character, with some out-of-town office developments.
- 3.3 The site is located in a large industrial area on the north-eastern fringes of the town of Tewkesbury. The town centre of Tewkesbury is located approximately 2.5km south-west of the development site, with the larger settlements of Cheltenham and Gloucester situated approximately 10 and 16km away from the site respectively.
- 3.4 The entire site is located in Flood Zone 1, defined by the Environment Agency, as an area at low risk of flooding.
- 3.5 There are no heritage considerations which impact the application.
- 3.6 The site is comprised entirely of hardstanding and is void of natural features. Elsewhere, the site benefits from a buffer of trees, hedges and shrubbery which provides natural screening.. These natural features will not be impacted by the development.
- 3.7 The site is accessible from Northway and Tewkesbury on foot as well as neighbouring settlements by bicycle, making active transport a viable method for reaching the site from many nearby areas.
- 3.8 By public transport, there are bus stops on Northway Lane a short walk south from the site. These are served by the #41 and #71 buses, providing links to Northway, Tewkesbury, Cheltenham and Gloucester. Connections to regional destinations are provided by the nearby Ashchurch for Tewkesbury train station with frequent services to regional destinations including Worcester, Birmingham and Bristol.
- 3.9 The site is well connected to the regional road network, located less than 1km from junction 9 of the M5. This makes the site well located for logistics and distribution operations.

Local Plan Designation

- 3.10 The site is located within the 'Major Employment Site' designation in the Tewkesbury Borough Plan 2011-2031 Policies Map, subject to Local Plan Policy EMP1.

4 Planning Policy and Evidence Base

National Planning Policy Framework

- 4.1 The National Planning Policy Framework ('NPPF'; September 2023) sets out the purpose of the planning system of achieving sustainable development via three overarching objectives: **economic, social and environmental**.
- 4.2 Paragraph 11 of the NPPF requires Local Planning Authorities to apply a presumption in favour of sustainable development during decision-taking. This means that Local Planning Authorities should be:

“...approving development proposals that accord with an up-to-date development plan without delay; or

...where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i) The application of the policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

- 4.3 In support of building a strong and competitive economy, paragraph 81 of the NPPF states 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.”

- 4.4 Paragraph 83 of NPPF also goes on to explain that planning policies and decisions should *“recognise and address the specific locational requirements of different sectors.”* This requirement includes making provision *“for storage and distribution operations at a variety of scales and in suitably accessible locations.”*

Local Policy

- 4.5 The local development plan for Tewkesbury consists of the Tewkesbury Borough Plan 2011-2031 and the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011-2031.

4.6 Policies of relevance from each document are outlined below:

Tewkesbury Borough Plan 2011-2031

- Policy EMP1: Major Employment Sites

“At Major Employment Sites, as defined on the Policies Map, the Borough Council will support in principle proposals for ... storage and distribution development.”

- Policy EMP5: New Employment Development (General)

“Proposals for new employment development that are acceptable in principle in accordance with policies EMP1 – EMP4 will be permitted, subject to the application of other plan policies, where the following criteria are satisfied:

- 1. Any increase in traffic can be accommodated by the existing transport network;*
- 2. There is provision for safe and convenient access by sustainable transport modes, commensurate with the scale and nature of the proposed development and the location of the site;*
- 3. Satisfactory vehicular access, parking sufficient to meet demand and manoeuvring space can be provided, including sufficient parking for heavy goods vehicles where necessary;*
- 4. The proposal would not result in an unacceptable adverse impact on the amenity of neighbouring uses, particularly residential properties;*
- 5. The scale and design of the proposal is compatible with the character of the existing location and its setting paying particular regard to Areas of Outstanding Natural Beauty and Special Landscape Areas;*
- 6. The proposal would not result in an unacceptable adverse environmental impact, for example by causing unacceptable levels of noise, air, water, soil or light pollution;*
- 7. Provision can be made for efficient and effective management of waste from the site that supports the waste hierarchy and encourages resource efficiency and waste reduction.”*

- Policy EMP6: Safeguarding of Employment Sites

“Employment sites will be safeguarded for employment uses as defined in Policy EMP1 and the loss or change of use of a site to non employment uses will generally be resisted.”

Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011-2031

- Policy SD1: Employment - Except Retail Development

“Employment-related development will be supported:

...

ii. At locations allocated for employment use within the Development Plan;

...

vii. Where it allows the growth or expansion of existing business especially in the key growth sectors, subject to all other policies of the plan”

- Policy SD3: Sustainable Design and Construction

“1. Development proposals will demonstrate how they contribute to the aims of sustainability by increasing energy efficiency, minimising waste and avoiding the unnecessary pollution of air, harm to the water environment, and contamination of land or interference in other natural systems.”

- Policy SD4: Design Requirements

“New development should respond positively to, and respect the character of, the site and its surroundings, enhancing local distinctiveness, and addressing the urban structure and grain of the locality in terms of street pattern, layout, mass and form. It should be of a scale, type, density and materials appropriate to the site and its setting.”

5 Analysis

Principle

- 5.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section (2) of the Town and Country Planning Act 1990, the application must be considered alongside prevailing development plan policies.
- 5.2 In this case the development plan consists of the Tewkesbury Borough Plan 2011-2031 and the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011-2031.
- 5.3 The site lies within an area which is allocated as a *Major Employment Site*, where **Policy EMP1** of the Borough Plan applies. In these areas, the Council ***“will support in principle proposals for ... storage and distribution development”***. **Policy SD1** of the JCS expands upon this, stating that employment development will also be supported ***“Where it allows the growth or expansion of existing business especially in the key growth sectors”***. Amongst these key growth sectors is engineering, a sector which Hydro make an important contribution to in the local economy.
- 5.4 The proposals are also supported by **Policy EMP6** of the Borough Plan which outlines that ***“Employment sites will be safeguarded for employment uses”***. The proposed development will help to safeguard the site for continued employment use by allowing Hydro to meet its changing operational requirements.
- 5.5 **Policy EMP5** sets out the criteria under which employment development which accords with **Policy EMP1** will be acceptable. It has been demonstrated, or will be demonstrated throughout this statement, that all these criteria have been met.
- 5.6 The proposals make efficient use of previously developed land within Hydro’s premises by addressing the company’s identified need for additional sheltered storage space. In doing so, the development will improve operational efficiency on site and protect goods from weather damage, whilst also improving working conditions for employees by providing a dry area to access goods.
- 5.7 The proposals are also supported by national policy guidance. The NPPF emphasises the significant weight that should be placed on the need to support economic growth and productivity, taking into account the need of local businesses (para. 81). It also states that planning decisions ***“should recognise and address the specific locational requirements of different sectors”*** including ***“for storage and distribution operations at a variety of scales and in suitably accessible locations”*** (para. 83).

- 5.8 The proposals are in a suitable location, compliant with national and local policy, entirely appropriate to the surrounding area and will meet the needs of an established local business and employer. The proposals should therefore be supported in principle.

Development Management Considerations

Design and Layout

- 5.9 The siting of the building was chosen to ensure the most efficient use of the site by allowing for continued and safe use of existing access routes. The building is located in an area previously used for external storage, therefore the operational layout of the site will remain unchanged.
- 5.10 The proposed building is subordinate to the existing warehouse building on site both in terms of footprint and scale and massing. This results in minimal visual impact on the surroundings as a result of the development.
- 5.11 The building will be constructed from light grey single sheet steel walls and a translucent-white PVC-coated polyester roof, with galvanised steel roller shutter doors and an aluminium frame. This will reflect the materials and colour palette of the main warehouse building as well as those used in nearby industrial premises.
- 5.12 The design of the building has been chosen so as to ensure that it is responsive to its site and surroundings in terms of layout, scale, mass, form, type, density and materials and is therefore compliant with **Policy SD4** of the JCS.

Neighbour Amenity

- 5.13 It is noted that the siting of the building is within the vicinity of office buildings on Miller Court to the south. The interface distance between these buildings and the proposed warehouse building is approximately 15m.
- 5.14 The proposals will not lead to any change or intensification of existing lawful industrial operations on site. The area where the building is to be sited is marked as a designated area where external storage is permitted. This was secured by condition in the planning permission for the development of the site in 2002 (02/00006/FUL).
- 5.15 Permission was granted for the construction of the industrial premises which Hydro now occupies three years prior to permission being granted for the construction of the office units to the south on

Miller Court. The nature of operations on this area of the application site have therefore remained constant since before the office units were developed.

- 5.16 Rather than any change in the use of this area of the site, the building will conceal this area from the office buildings and offer protection from any visual, noise or vibration disturbances.
- 5.17 Visually, the proposed building is subordinate to the existing warehouse building against which it is set in the view from Miller Court. Combined with the design of the building which reflects that of the existing warehouse building, the visual impact of the development to neighbouring properties will be minimal.

Parking, Access and Vehicular Movement

- 5.18 There is currently provision for parking of 201 vehicles on the wider site. This level of parking and the number of employees on site will remain as existing. This level of parking will remain more than sufficient to accommodate 80 staff members and visitors without any impact on the local highways network.
- 5.19 Access to the building will be achieved via the north-facing elevation building which is open-sided. There will also be a pedestrian door and a 7m x 5m roller shutter door on the south-facing elevation. This will ensure that the building is easily accessible from all sides by both vehicles and pedestrians and will allow for existing access routes to serve the building.
- 5.20 Vehicular and pedestrian access to the site will remain as existing directly off Severn Drive to the west. There will be no change to the volume of HGV traffic entering and leaving the site as the building will not impact on the scale of on-site operations.
- 5.21 As the area where the proposed structure will be located is currently used for external storage, there will be no impact on areas used for vehicular access or manoeuvrability within the site as a result of the development.

Energy Usage

- 5.22 The energy requirements for the operation of the building will be very low. As the building is an open-sided building used for storage purposes only, there will be no heating requirements. The open-sided nature of the building also removes the need for any ventilation systems.
- 5.23 The only energy consumption in the operation of the building will be for lighting. The translucent-white polyester roof has been designed to allow transmission of light, restricting hours where lighting

is required to operations falling outside of daylight hours. Furthermore, as a storage building only, employees will not occupy the building for extended periods of time, further minimising energy usage.

- 5.24 The proposed design is conducive to minimising energy requirements for the operation of the building and therefore accords with **Policy SD3** of the JCS.

Waste Minimisation

- 5.25 The building follows the principles of waste minimisation both in its construction and lifespan.
- 5.26 The building is prefabricated off site and is assembled on site by anchoring to the existing hardstanding. This process therefore minimises waste material by removing the requirement for groundworks or foundations. Furthermore, no building or structures are to be demolished as part of the construction process, further minimising waste.
- 5.27 The pre-fabricated nature of the building's construction also means that it can be removed from the site and reinstalled elsewhere if the operational requirements of the company evolve or if the company relocates. This will enable the building to be reused where necessary throughout its lifespan.
- 5.28 The protection which the building will provide from weather conditions will also remove the need for material consumption on site in day-to-day operations. The aluminium extrusion bar lengths are currently coated in a thick plastic covering to protect against damage from the sun and rain. The building would remove the need for this protective covering and considerably decrease the amount of single-use plastic waste on site.
- 5.29 It is evident that throughout the lifespan of the building, the production of waste is minimised, satisfying the requirements set out in **Policy SD3** of the JCS.

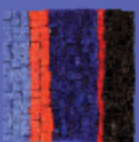
Presumption in Favour of Sustainable Development

- 5.30 Paragraph 11 of NPPF outlines the presumption in favour of sustainable development which should be applied to planning decisions. We have demonstrated throughout this statement that the proposed development mutually supports the objectives of sustainable development which are set out in paragraph 8, particularly in relation to the economic objective.
- 5.31 The proposed development will support the ongoing operation of an established business and local employer, allowing them to meet their changing operational needs whilst remaining in situ.

- 5.32 With regard to the social objective, the building will improve working conditions for employees on site by providing a protected environment to access goods. It has also been shown that the building will have no unacceptable impact on neighbour amenity.
- 5.33 As discussed above, the proposals also meet the environmental objective. The application site is in a sustainable location close to the town centre of Tewkesbury which is accessible by non-car modes of active and public transport. The design of the building ensures that energy usage and waste are minimised throughout the building's lifespan. The proposals make efficient use of a previously developed area of land to meet an identified need, removing the need for land consumption elsewhere.
- 5.34 The proposed development mutually supports the economic, social and environmental objectives and constitutes sustainable development. A presumption in favour of approval should therefore be applied.

6 Conclusion

- 6.1 This Statement has demonstrated that the proposals should be approved having regard to national and local planning policy, together with other material considerations.
- 6.2 The application site is designated as a *Major Employment Site*. Several policies contained in the local development plan outline that appropriate employment development will be supported in these areas and that they should be safeguarded for employment uses. The proposals are therefore acceptable in principle.
- 6.3 The proposals will address Hydro's identified urgent need for additional sheltered storage space. If unmet, this requirement could inhibit the company's ability to meet its operational requirements whilst remaining in-situ. By supporting an established business and local employer, the proposals will help to safeguard the company's contribution to the local economy and provide local employment opportunities.
- 6.4 The proposals are also supported by the NPPF which refers to the significant weight which should be placed on supporting development of this kind, enabling local businesses to invest, expand and adapt.
- 6.5 The building's appearance will be appropriate to its surroundings, reflecting the design and materials used in surrounding industrial premises.
- 6.6 The impact on matters including flood risk, heritage assets, natural features, neighbour amenity, parking, access and vehicular movement has also been examined and it has been shown that the development will not impact on any of these.
- 6.7 We have demonstrated that the proposals meet the sustainable objectives as set out in Paragraphs 8 and 11 of the Framework. The development will sustainably meet the operational needs of an established local business and employer.
- 6.8 The proposals are entirely appropriate and comply with relevant planning policy and guidance. There is therefore a compelling case for the granting of permission without delay.



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