

# PLANNING STATEMENT

Proposed Car Parking at Units 1 & 2,  
Channel View Road, Dover, CT17 9TW  
Home Office

February 2024



## CONTENTS

1	Introduction	4
2	Site Description	5
3	Site History	6
4	Planning Policy Summary	7
5	Planning Assessment	12
6	Summary and Recommendations	14

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Version	Prepared by	Approved by	Date
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## 1 Introduction

- 1.1 This Planning Statement has been prepared by Cushman & Wakefield (C&W) on behalf of the Home Office (HO) in support of a Planning Application for the Change of Use to provide car parking at Units 1 & 2, Channel View Road, Dover (hereafter referred to as the 'Site'), supporting the use of the Home Office Key Intake Unit (KIU) at Unit 5 Channel View Road.
- 1.2 [REDACTED]
- 1.3 The demands on the KIU have increased significantly since it was opened. [REDACTED]  
[REDACTED] There is insufficient parking space on the KIU site and staff are currently parking on street along Channel View Road.
- 1.4 It is understood that that the current parking arrangements are impacting other local businesses in the area. Mindful of these concerns the applicant proposes to address the issue by providing additional car parking within Units 1 and 2, Channel View Road (the application site), which are a short walk from the KIU facility.
- 1.5 The proposal seeks to provide an additional 60 parking spaces at the Site for HO staff to use, removing the need for informal roadside parking in the area. The proposal would introduce additional parking spaces on the ground floor inside the unit, in addition to the outdoor spaces.
- 1.6 This Planning Statement considers the planning context of the proposed development, detailing the site history, policy, and need for the application. The application is accompanied by the following information:
- Site Location Plan
  - Existing and Proposed Site Layout Plans
  - Transport Statement
  - Travel Plan
- 1.7 Pre-application discussions have been held with the Local Planning Authority, Dover District Council and the Highway Authority, Kent County Council.

## 2 Site Description

- 2.1 Units 1 & 2, Channel View Road is located southwest of Dover, a short distance (500m) from the Harbour. The units lie at the end of Channel View Road, a cul-de-sac in the industrial estate bordering the harbour and dockyards. The site benefits from good access to the A2 towards Canterbury, and A20 and M20 motorway towards London.
- 2.2 The site extends to 3,391 sq. m. and comprises of warehouse bays with steel portal frames providing warehouse space (approximately 1,467 sq. m.), alongside ancillary offices (approximately 303 sq. m), stores, and WCs. Alongside this, a yard provides parking and loading space. Adjacent to the site are units 3 & 4, Channel View Road, which do not form part of this application. Units 3 & 4 share an access with the application site.

**Figure 2.1 Site Location Plan**



### **Surrounding Area**

- 2.3 Units 1 & 2 are surrounded by predominantly industrial warehouse buildings, woodland, and dockland in the wider area. The site is situated to the southwest of the town of Dover, falling within the boundary of Dover District Council and with Kent County.

2.4 The topography of the site is sloping, located on a hillside facing the coast and harbour.

### **3 Site History**

3.1 Following a review of the council's online records, there does not appear to be any relevant previous planning history for the site.

3.2 The current use class of Units 1 and 2 is Classes B2, B8 and E (Commercial, Business and Service).

## 4 Planning Policy Summary

4.1 The site at Channel View Road falls within the administrative area of Dover District Council. The Development Plan for Dover comprises the Dover Core Strategy (2010) and a Land Allocations Local Plan (2015). A New District Plan is currently subject to public examination stages with a statement of common ground between Dover District Council and Kent County Council submitted on the 16th November 2023. It is anticipated the New District Plan will be adopted later in 2024.

4.2 The National Planning Policy Framework (NPPF) (2023) and Guidance, and Supplementary Planning Documents (SPDs) are material considerations in the determination of planning applications for the development of the site.

### National Planning Policy Framework (December 2023)

4.3 The NPPF sets out the presumption in favour of sustainable development. Paragraph 11 states that:

*“For decision-taking this means:*

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

*d. 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 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.”*

4.4 Within pre-application discussions, the Local Planning authority (LPA) confirmed that the employment land policies contained in the adopted Local Plan are out of date. Thus, paragraph 11d is engaged for the purposes of determining this application.

4.5 Paragraph 85 relates to building strong competitive economies and 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. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.”*

4.6 Paragraph 100 relates to the delivery of public service infrastructure and states:

*“To ensure faster delivery of other public service infrastructure such as further education colleges, hospitals and criminal justice accommodation, local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted.”*

- 4.7 Paragraph 123 refers to making effective use of land and states:

*“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or ‘brownfield’ land.”*

### **Dover Core Strategy (2010)**

- 4.8 The adopted plan contains policies that guide development within the district through the plan period to 2026. The key policies relating to the proposed use of the property are summarised below.

#### **Policy DM 2 –Protection of Employment Land and Buildings**

- 4.9 This states regarding employment allocated land:

*“Land allocated for employment uses as shown on the Proposals Map or with extant planning permission for employment uses will not be granted permission for alternative uses unless it has been subsequently allocated for that alternative use in a Development Plan Document.*

*Permission for changes of use or redevelopment of land and buildings currently or last in use for employment purposes will only be granted if the land or buildings are no longer viable or appropriate for employment use.”*

#### **Policy DM13 –Parking Provision**

- 4.10 The policy states:

*“Provision for parking should be a design led process based upon the characteristics of the site, the locality, the nature of the proposed development and its design objectives.*

*Provision for non-residential development, and for residential cycle provision, should be informed by Kent County Council Guidance SPG4, or any successor. Provision for residential development should be informed by the guidance in the Table for Residential Parking.”*

### **Land Allocations Plan (2015)**

- 4.11 The plan shows the site at Units 1 & 2 Channel View Road to be within Urban Allocation Area 5, an area in which *“new development has a key role in creating or restoring the character of Dover in the future”*. There is, however, no specific site allocation for Units 1 & 2 Channel View Road indicating continued support for employment generating uses in this location.



### Dover Character Areas



Figure 1: The site lies on the western edge of character allocation 5

### Draft Dover District Local Plan (Submission Draft 2022)

4.12 The emerging local plan contains policies to guide development in Dover through the Plan Period up to 2040. Draft policies relevant to the proposal are discussed below:

#### Policy E2 - Loss or Redevelopment of Employment Sites and Premises

*“Proposals which result in the loss of existing employment sites (as identified on the policies map), or other buildings and land currently used for employment purposes (office (E(g)(i)), research and development (E(g)(ii)), light industrial (E(g)(ii)), B2 and B8 uses) within the District, will only be supported where:*

- a. The site is allocated for alternative use within this Plan, or*
- b. The proposal would not result in a significant, or harmful reduction in the supply of land available for employment purposes for the remainder of the plan period, having regard to the type of employment land proposed for reuse and its location; and*
- c. It has been demonstrated that an employment use is no longer suitable or viable.*

*The proposed replacement use should be compatible with the uses in the surrounding area and should not prejudice the ongoing operation of existing businesses nearby.”*

4.13 The proposed development includes the retention of existing employment floorspace, which comprises office accommodation. The proposed change of use of the warehouse floorspace will provide car parking associated with the KIU located at Unit 5 and supports a significant employment use in the local area. Accordingly, the proposed development will not result in a significant or harmful reduction in the supply of land available for employment purposes.

- 4.14 The provision of additional parking will significantly reduce on street parking in the local area, thereby benefitting established local businesses. Accordingly, the proposal is considered to be compatible with uses in the surrounding area. Indeed, the purpose of the proposed development is to ensure compatibility with the surrounding employment uses.

#### **Policy TI1 - Sustainable Transport and Travel**

*“Development should, in so far as its size, characteristic and location:*

- a) Be designed so that opportunities for sustainable transport modes are maximised and provide for;*
  - c) Give priority to the needs of pedestrians, cyclists, users of public transport, car sharers and users of low and ultra-low emission vehicles;*
  - d) Be readily accessible by sustainable transport modes through the provision of high quality, engineered, safe and direct walking and cycling routes within a permeable site layout;*
  - e) Contribute to sustainable transport proposals including off-site improvements to cycling and walking routes and public transport facilities, and to proposals within the Dover Infrastructure Delivery Plan; and*
  - f) Make provision for secure cycle parking and storage in accordance with the Parking Standards.”*
- 4.15 Due to the limitations and challenges stemming from pedestrian and cycle access to the site, the scheme is constrained to providing vehicular access for members of staff. The design has sought to follow this policy as far as practicable, considering EVs and proposing charging points alongside the new parking spaces. The development is therefore considered in accordance with the policy.

#### **Policy TI2 - Transport Statements, Assessments and Travel Plans**

*“Developments that would generate significant traffic movements must be well related to the primary and secondary road network. Proposals which would generate levels and types of traffic movements resulting in severe cumulative residual impacts in terms of capacity and road safety will not be permitted.*

*New accesses and intensified use of existing accesses onto the road network will not be permitted if it would result in a clear risk of crashes or traffic delays unless the proposals can incorporate measures that provide sufficient mitigation.*

*Applicants must demonstrate that traffic movements to and from the development can be accommodated, resolved, or mitigated to avoid severe cumulative residual impacts.*

*A Transport Statement, Transport Assessment and/or a Travel Plan may be required depending on the nature and scale of the proposal and the level of significant transport movements generated, the requirements of which will be secured by planning condition or Section 106 legal agreement.”*

- 4.16 A Travel Plan is submitted alongside this application, providing additional details regarding transport and the mitigation of travel impacts. It is considered the scheme satisfies this policy.

#### **Policy TI3 - Parking Provision on new Development**

*“The standards set out in the Parking Standards for Kent SPD and Kent Design Guide Review: Interim Guidance Note 3 (or any subsequent guidance) shall be the starting point for decision-taking on acceptable parking provision in all developments.”*

- 4.17 Kent Highways have been consulted regarding this development, and the Parking Standards SPD and Design Guide Review considered, satisfying Policy TI3.
- 4.18 The Kent County Council Parking Standards have been considered in the preparation of this scheme, and the proportion of EV charging points to be provided has been informed from this. 20% active EV charging will be provided internally and a further 13% passive charging for the external spaces. Furthermore, Kent Highways have been engaged at an early stage in order to inform the scheme and will be covered in more detail in section 6.

**Policy PM1 - Achieving High Quality Design, Place Making and the provision of Design Codes**

*“All development in the District must achieve a high quality of design, that promotes sustainability, and fosters a positive sense of place, by responding to the following principles in an integrated and coherent way. Development which is not well-designed will not be supported. Where relevant and appropriate, new development must:*

*6 Homes and Buildings:*

- a) Ensure that the siting, layout and design of vehicle and cycle parking (including detached garage blocks) is sensitively integrated into the development so as not to dominate the landscape, maintains an attractive and coherent street scene, does not prejudice the wider functionality of public and private space, and creates an effective functional link and relationship with the buildings and areas they serve. To achieve this a range of parking solutions are likely to be required to avoid the dominance of frontage parking.”*

- 4.19 Policy PM1 has been considered in the preparation of the proposal and the setting of the development considered and designed accordingly. As the existing streetscape lies within an area of predominantly employment use, car parking is not out of place and does not represent a change from the current urban form.

**Dover Economic Development Needs Assessment (2017)**

- 4.20 The Assessment provides evidence against which the proposed development can be considered. Specifically, whether the loss of B class employment use from part of the application building will be significant or harmful in supply terms for the District. The Assessment concludes that, in quantitative terms, there is enough supply to accommodate B class floorspace and land requirements under all the growth scenarios considered.
- 4.21 The report recommends the District’s employment site portfolio be re-visited, particularly in the context of the significant surplus of available land identified to accommodate the negligible requirements for floorspace found in the study.

*“Within the context of relatively limited requirements for employment space in Dover and a quantitative surplus of land available to meet business needs, it is recommended that a more pro-active approach is required to update the District’s portfolio of sites for business use and actively rationalise these to ensure that Dover’s best quality space is retained both for existing businesses and to accommodate business growth going forward”.*

## 5 Planning Assessment

- 5.1 The proposed use (car parking) is Sui Generis, as it does not fall within any of the specific categories set out in the Town and Country Planning (Use Classes) Order 1987 (as amended).
- 5.2 The proposal is for a partial change of use, with no demolition proposed. The proposed development will comprise the change of use of the existing warehouse units from Use Class B2, B8 to Sui Generis Car Parking Use.
- 5.3 The proposed is deemed the most realistic. Considering the very steep topography to access the site, cycling and walking is unlikely to be achievable, and therefore the most suitable alternative is to provide car parking to the site including EV Charging.
- 5.4 The existing office floorspace (Use Class E) will remain and provide employment associated with the KIU facility, which has expanded significantly since opening.
- 5.5 The proposed development is required to help address a pressing need for car parking associated with the KIU operation at Unit 5, Channel View Road. The provision of additional off-street parking will have the benefit of alleviating parking pressure on other nearby businesses.
- 5.6 The Units 1 & 2 are currently vacant and have been marketed for over 18 months without any interest. Accordingly, the proposal will utilise vacant floorspace and make best use of previously developed land. The Council's evidence base demonstrates that the loss of employment use from part of the application building will not result in a significant or harmful impact in supply terms for the District.
- 5.7 The proposed development includes upgrading the existing parking at the site to provide improvements to support the charging of electric vehicles and EV charging infrastructure. The amount of active EV charging points exceeds the Parking Standards for Kent County Council. There will be an overprovision of 20% active charging inside and 13% passive places externally.
- 5.8 A Travel Plan accompanies this planning submission in line with policy requirements and details how a sustainable transport solution can be achieved without detriment to access in the area.
- 5.9 The proposal will assist the operation of the KIU facility and improve the environment for adjoining employment uses.
- 5.10 The evidence submitted with the application demonstrates the proposal is sustainable development.
- 5.11 The benefits of the proposed development include:
- Retention of re-use of existing office floorspace
  - Provision of additional car parking within a vacant warehouse unit making best use of previously developed land
  - Suitable car parking required for the operation of the KIU, an important part of the public service infrastructure in Dover.
  - Improvement of existing parking provision on site with EV charging provision exceeding KCC standards.
  - A Travel Plan to encourage sustainable travel for staff.

- 5.12 The loss of warehouse floorspace resulting from the proposed development is not considered to significantly and demonstrably outweighed these benefits.

## 6 Summary and Recommendations

- 6.1 The proposal seeks to provide an additional 60 parking spaces at the Site for HO staff to use, removing the need for informal roadside parking in the area. The proposal retains the existing office floorspace and introduces additional parking spaces on the ground floor inside the units, in addition to the existing outdoor spaces. The spaces will provide 20% active, and 13% passive EV charging points.
- 6.2 The evidence submitted with the application demonstrates the proposal is sustainable development and the benefits of the proposed development are not significantly and demonstrably outweighed by adverse impacts.
- 6.3 Accordingly, it is respectfully requested that planning permission is granted.



**CUSHMAN &  
WAKEFIELD**