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Application No: 20/2085/FH

Location of Site: Motis Business Centre, Cheriton High Street, Folkestone CT19 4QJ

Development: Erection of 6 x commercial units for Class E (specifically for office, research & development and industrial) and Class B8 purposes, extension of existing centre to provide further Class E office floorspace, children's nursery, cafe and gym and the provision of a 115no. space truck stop, a transhipment building, along with an ancillary welfare facilities and office building, including access, parking and landscaping.

Applicant: Motis Ireland Ltd

Agent: Matthew Garvey, DHA Planning

Officer Contact: Robert Allan

SUMMARY

This application seeks permission for the erection of six commercial units for Class E and Class B8 purposes, an extension of the existing business centre to provide further Class E office floorspace as well as a children's nursery, cafe and gym, and the provision of a 115 space truck stop with a transhipment building, ancillary welfare facilities and office building, together with access, parking and landscaping. The site is allocated for approximately 65% of the total office supply in Folkestone and 30% of the total office supply in the district as a whole, with insufficient evidence supplied to adequately establish that there is an overwhelming need for additional HGV parking within the Folkestone & Hythe combined with a lack of demand for office space that would override the loss of strategically important employment allocation. Furthermore, the presence of lowland dry acid grassland within the adjacent SSSI cannot be completely ruled out and further air quality assessment work would be required to determine whether the development will result in any ecologically significant nitrogen deposition within this area of the SSSI, with potential for harm to a nationally important site should development proceed. The application is recommended for refusal on these two grounds. All other matters relating to visual amenity / design, impact on the AONB and SLA, residential amenity, contamination, drainage, archaeology and highway safety are considered to be acceptable.

RECOMMENDATION:

That planning permission be refused for the reasons set out at the end of the report.

1. INTRODUCTION

1.1. The application is reported to Committee at the request of Cllr David Wimble on grounds that a change of use would make more sense as people are not renting office space and the proposal would make a more valued contribution to the local district. .

2. SITE AND SURROUNDINGS

- 2.1. The application site is approximately 3.51 ha in size, is located immediately south of the M20 and is accessed via Cheriton High Street. It currently comprises an existing office unit/conference centre, otherwise referred to as Motis Business Centre, and car park to the south and west of the site which provides in excess of 200 spaces. The remainder of the site comprises grassland and scrub.
- 2.2. The Motis Business Centre building was converted into approximately 2,695 sqm (29,000 sqft) of managed office suites in 2017/18 providing a total of 27 managed office suites starting from 15 sqm (160 sqft) in size, all of which benefit from use of shared facilities within the building. The building also provides serviced meeting rooms as well as virtual office facilities and desk space.
- 2.3. The site is located within the defined settlement boundary. The western end of the site is located within the designated Kent Downs Area of Outstanding Beauty (AONB) and North Downs Special Landscape Area (SLA) and the whole site lies within Flood Zone 1 and is in an area of archaeological notification for major applications. Public footpath HF55 runs along the northern boundary of the site, although outside of the application site, and connects to the wider Public Right of Way Network.
- 2.4. The site's surrounds comprise a mix of commercial and former Ministry Of Defence uses. The M20 forms the site's northern boundary, and the Southeastern London to Folkestone railway line forms the south. Cheriton Business Parc lies to the eastern boundary and comprises a series of commercial units, as well as a Holiday Inn Express hotel. Cheriton lies further beyond, to the south east of the site.
- 2.5. A site location plan is attached to this report as **Appendix 1**.

3. PROPOSAL

- 3.1 The proposal seeks full planning permission for the erection of six Class E(g) (specifically office, research and development and industrial uses) and B8 (storage or distribution) commercial units, and the extension of the existing Motis office building to provide further Class E floor space, including offices, a children's nursery, café, and gym. The proposal also includes the provision of a 115 space truck stop with ancillary welfare facilities, transhipment building and office. The eastern end (Figure 1) and western end (figure 2) of the site can be seen below:

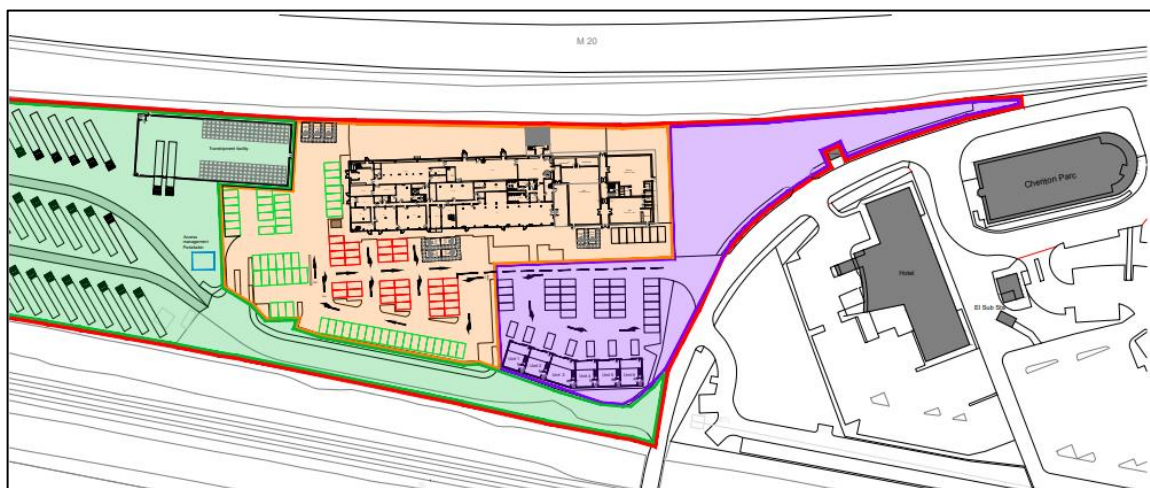


Figure 1

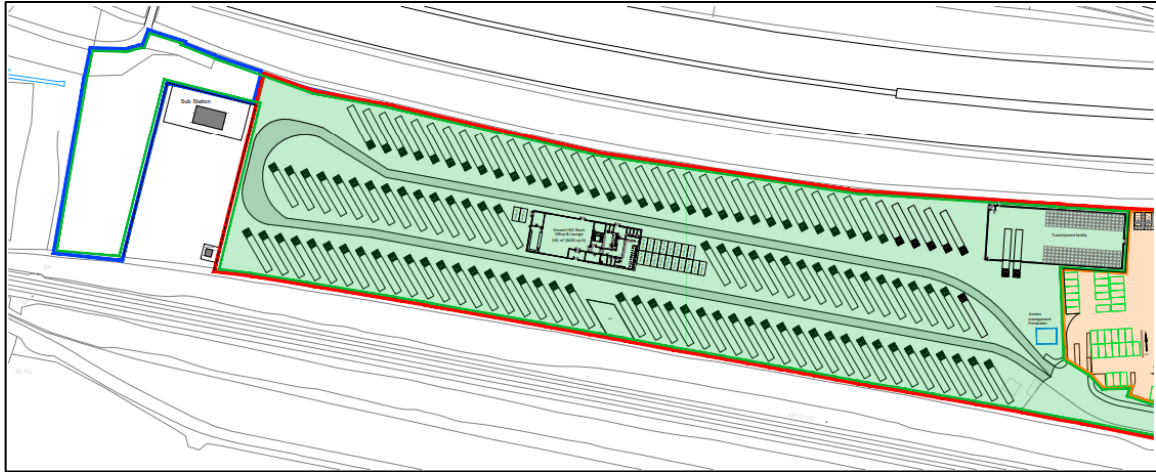


Figure 2

- 3.2 The planning application seeks to extend the existing Motis Business centre building along its eastern elevation in order to provide additional floor space across two floors. Front and rear elevations are shown below in figure 3. At first floor level, the extension will provide an additional 555sqm (5,972sqft) of office floor space. At ground floor level, the extension would provide a gym with WC and shower facilities, measuring 254sqm (2,733sqft), a nursery measuring 168sqm (1,807sqft) and a café measuring 115sqm (1,237sqft). These facilities will be accessible to the general public, although it is largely expected that users will comprise of employees from a local catchment area.

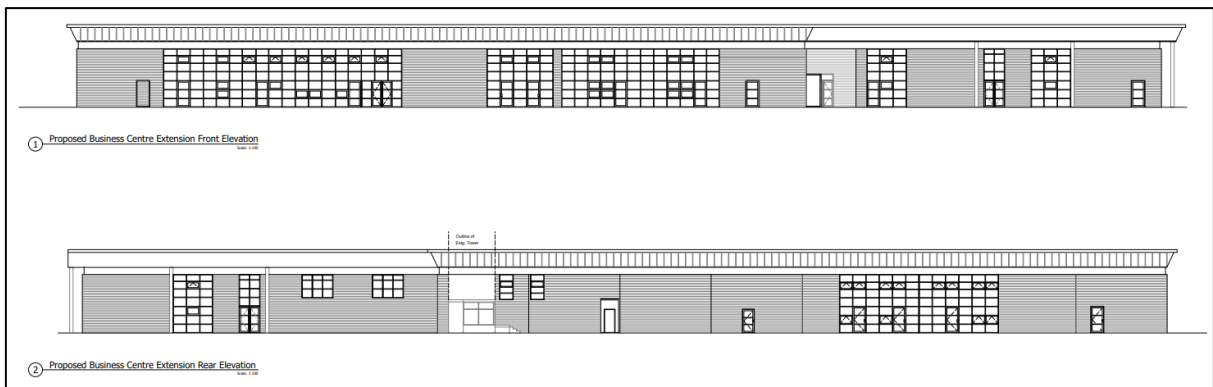


Figure 3: Motis extension

- 3.3 The proposed development also includes the construction of six SME (small and medium sized enterprises) business units in the south eastern corner of the site, within the existing car parking area. These will be two storeys, with a gently sloping flat roof and a ridge height of approximately seven metres and having a modern and utilitarian form. Elevations are shown in figure 4. The units would be self-contained and served by separate access and roller shutter doors in the front elevation. The internal accommodation would be arranged over two floors, the first floor being a mezzanine level, with separate W.C facilities at ground floor level.

Unit	Size (sqft)	Size (sqm)
1	1270	118
2	1270	118
3	1248	116
4	1291	120
5	1248	116

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6	1270	118
Total	7597	706

3.4 The western section of the site will serve as the lorry park, providing 115 HGV parking spaces for overnight stay, arranged over three rows. This would represent approximately 59% of the site area. A two-storey drivers lounge/amenity building is proposed at the centre of the of the lorry park measuring 1,134sqm (1,220sqft). This will provide a drivers dining area and lounge, internet rooms, reception, W.C and bathroom facilities and kitchen areas at ground floor level with offices, training areas, a management suite for Motis and separate W.C and kitchen facilities at first floor level. The front and rear elevation can be seen in figure 5.



Figure 4: business units



Figure 5: drivers' amenity lounge

3.5 The proposal includes the construction of a transshipment building measuring 958sqm (10,308sqft) in the north eastern corner of the lorry park, adjacent to the existing Business Centre. This will form a utilitarian industrial building with roller shutters to accommodate two lorries at one time. The facility would operate under a pre-booking system, which would be exclusively available for Motis account holders. The site will be monitored via Automatic Number-plate Recognition (ANPR) and manned 24/7 with Truck Marshalls. The front and rear elevations can be seen in figure 6.

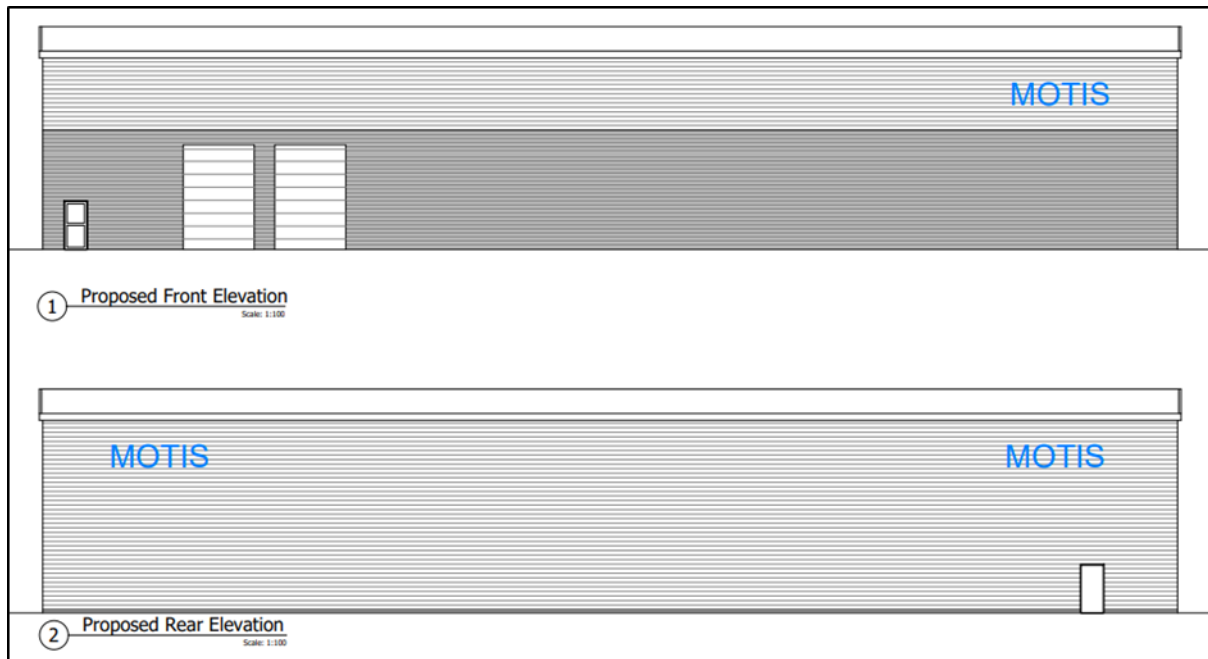


Figure 6: transshipment building

- 3.6 The applicant has also proposed the widening of a section of Cheriton High Street to six metres, apart from a short section measuring 15 metres.
- 3.7 The following reports were submitted by the applicant in support of the proposals:

Design and Access Statement

- 3.8 This document describes the site and surrounding area, including constraints and considerations, the current use of the site, what is proposed for the site, the design development history, and considers issues of layout, circulation and access, scale, massing and appearance, landscaping and sustainability. It also sets out the activities of Motis in the UK and Europe and identifies the applicants perceived benefits from the scheme, the requirement for the proposal and also sets out some of the broad operational parameters for the proposed use.

Planning Statement

- 3.9 This document identifies the background to the stated demand for the proposed facilities and also sets out the perceived benefits of the proposal through the provision of a truck stop that would accommodate demand from increasing freight traffic and help reduce illegal HGV parking, as well as providing additional flexible office space for small-medium sized businesses, a nursery, gym and café and other offices associated with the lorry-park use. It further sets out that there would be no impact upon the nearby Cheriton shopping area or the character and appearance of the AONB; it analyses the likely vehicle movements associated with the development and the highway impact, as well as setting out the proposed works for the widening of Cheriton High Street. Flooding, noise, ecology, contamination and air quality (as set out in separate documents supporting the application) are all stated to be acceptable and the document concludes that the proposal will deliver benefits to through the

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delivery of a truck stop and in making a contribution to employment land supply through the provision of additional commercial floor space.

Air Quality Assessment (AQA)

- 3.10 This document identifies that the proposals have the potential to cause air quality impacts as a result of dust emissions during construction and road traffic exhaust emissions associated with vehicles travelling to and from the site during operation. It concludes that the use of good practice control measures would provide suitable mitigation and reduce potential impacts to an acceptable level in respect of dust, whilst predicted air quality impacts as a result of traffic generated by the development were not significant at any sensitive location in the vicinity of the site.

Ecological Air Quality Screening

- 3.11 This document identifies that although the Seabrook Valley SSSI designation is situated within 200m of an affected road link, sensitive site features are unlikely to be present within the relevant distance criteria and in accordance with NE guidance, the proposed development is unlikely to have a significant air quality impact on the designation, with further assessment not considered to be necessary.

Phase 1 Desk Study

- 3.12 This document determines the contaminative status of the site and provides a general indication of the likely geoenvironmental issues which may be present on site or affect the site, as well as to providing guidance on any resultant liabilities. Information on likely geotechnical conditions and hazards is also assessed. It determines that it is unlikely that contamination is present on site.

Transport Statement (TS)

- 3.13 This document covers the broad elements of a Transport Statement with regards the employment usage, and also discusses the implications of additional HGV movements from the overnight lorry parking, concluding that there are no transport concerns being shown for either of the elements of the proposal as the cumulative increase in vehicle traffic is minimal and there are no safety concerns regarding the small increase in the frequency of HGVs passing each other, mitigated through road widening. The employment proposals are stated to be suitable for this location as evidenced in the emerging policies in the Folkestone and Hythe Places and Policies Local Plan, as supported by a review of walking, cycling and public transport facilities in this assessment.

Preliminary Ecological Appraisal (PEA)

- 3.14 This document was produced to explore potential ecological constraints, considerations and opportunities and the potential need for additional ecological survey work at the application site. It concludes that:
- on-site hedgerow and boundary woodland will need to be protected during the construction stage;
 - a badger walkover survey is required to identify whether there are any badger setts present on site;

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- a bat activity survey will need to be completed to assess if / how the site is used by foraging and/or commuting bats, and therefore whether the loss of suitable bat foraging and commuting habitat and the proposed illumination of the site will significantly adversely affect the local bat population;
- a bat-sensitive lighting scheme will need to be delivered on the application site, especially adjacent to site boundary habitats;
- a botanical walkover survey of the 15m wide band of the SSSI that falls within the 200m radius from the road assessed will need to be undertaken;
- no vegetation or ground clearance works should be undertaken until the results of the additional ecological surveys are known.

Noise Impact Assessment (NIA)

3.15 This report sets out the assessment methodology adopted and evaluates the results of operational noise relative to agreed acoustic design criteria. An assessment was conducted of noise levels generated by operations on the site, including predicting noise levels at the nearest noise-sensitive receivers, showing that the scheme meets the set noise limits at the noise-sensitive receivers and demonstrating that operational noise from the scheme would be considered to be below the Lowest Observable Adverse Effect Level (LOAEL).

Flood Risk and Surface Water Drainage Strategy

3.16 This report appraises the risk of flooding from all sources and provides a sustainable solution for managing the surface water runoff discharged from the development site. It concludes that the risk to the proposed development is low and that infiltrating runoff into the ground will present the most viable solution for managing runoff from the proposed development through a combination of permeable surfacing and soakaways.

Landscape and Visual Impact Assessment

3.17 This document:

- describes the existing baseline conditions with regard to key landscape components and identifies the landscape character areas (LCAs) that result from the combination of these components for the application site and wider study area;
- appraises the existing landscape in terms of character and views, and establishes its ability to accommodate change in relation to the proposed development;
- describes the anticipated changes resulting from the proposed development and assess the 'magnitude of change' upon landscape character and views;
- determines the nature of effect of identified impacts with regard to scale, duration permanence and value.

It concludes that the application site has a high capacity to accommodate the proposed development. Its visual impact is low when seen from afar and can be mitigated within the design of the proposed development. It is concluded that the proposed development is of an appropriate type, scale massing and appearance for its setting, and although the landscape and visual character of the site itself would be changed, this would not cause an adverse change in the prevailing landscape and visual character of the wider area, including the AONB and SLA.

Landscape Masterplan

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3.18 This document is a visual representation of proposed planting to site boundaries with mixed native-species hedgerow in order to reinforce the existing planting.

4. RELEVANT PLANNING HISTORY

4.1 The relevant planning history for the site is as follows:

94/0443/SH	Outline application for office development with associated car parking and landscaping (as amended by drawing no. CHP/00/03C and letters dated 8th and 13th September 1994)	Approved
97/0803/SH	Change of Use from cafe/exhibition area to offices, conference centre and customer information point.	Approved
Y01/0303/SH	Variation of condition 2 of outline planning permissions 97/0766/SH (renewal of outline planning permission) for office development with associated car parking and landscaping.	Approved
Y03/1157/SH	External alterations including replacement of existing cladding and windows, and minor alterations to the car parking area.	Approved
Y05/0294/SH	Outline application for the erection of 9 no. buildings to include: creche, medical provision/clinic, hotel, offices and business startup units together with new vehicular access.	Approved
Y/11/0265/SH	Erection of first floor extension under existing canopy to provide accommodation for security staff.	Approved
Y11/0757/SH	Section 73 application to vary condition 4 of planning approval Y/11.0265/SH for erection of first floor extension under existing canopy to provide accommodation for security staff to allow construction of enclosed/covered fire escape to north facing elevation and changes to elevational treatment.	Approved
Y/17/0845/SH	Change of use of exhibition centre and church (Class D1) into managed office suites (Class B1) with new shop fronts and glazing and other external alterations, together with gates, fencing and footpaths.	Approved
Y/18/0003/NMA	Non material amendment to application Y17/0845/SH (change of use of exhibition centre and church (Class D1) into managed office suites (Class B1) with new shop fronts and glazing and other external alterations, together with gates, fencing and footpaths) to allow internal layout alterations, and external glazing changes.	Approved

5. CONSULTATION RESPONSES

5.1 The consultation responses are summarised below.

Consultees

Folkestone Town Council: Object – littering, light pollution, noise pollution, emission near to residential properties

KCC Highways and Transportation: No objection subject to conditions

Highways England: No objection

KCC Ecology: No objection

KCC Public Rights of Way: No comments received

KCC Flood and Water Management: No objection subject to condition

Natural England: No objection

Environment Agency: No objection subject to conditions

Kent Downs AONB Unit: Request for enhanced landscape buffering to the west; assessment of night time effects within LVIA; cladding should not match existing, but dark, non-reflective materials should be selected instead.

Southern Water: No objection, subject to condition

Affinity Water: No objection

Contamination Consultant: No objection, subject to condition

KCC Archaeology: No objection

Environmental Health Officer: No objection

Local Residents Comments

5.2 Fourteen neighbours directly consulted. One letter of objection, one letter of support received and one letters neither supporting nor objecting to the application.

5.3 I have read all of the letters received. The key issues are summarised below:

Objection

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- Level of rubbish left by lorry drivers currently
- Lorries not paying for parking blocking residential roads

Support

- East Kent has lost considerable amounts of office space due to permitted development rights
- Demand for flexible office space increasing
- Likely surge in demand predicted for office space, post-lockdown
- Proposed expansion will deliver quality workspace that Folkestone is facing an immediate and pressing demand for
- Truck parking facilities will release pressure from existing road networks
- Employment opportunity

General Comments

- Existing use generates large amounts of litter
- Lorries churn up grass
- Drainage is a concern
- Is there a need for office space as people work from home
- Extra lighting may impact upon wildlife
- Additional planting would be welcomed to improve biodiversity and mitigate noise
- No cycle paths to site

5.4 Responses are available in full on the planning file on the Council's website:

<https://searchplanapps.folkestone-hythe.gov.uk/online-applications/>

6. RELEVANT PLANNING POLICY

6.1 The Development Plan comprises the Places and Policies Local Plan 2020 and the Core Strategy Local Plan 2013.

6.2 The Folkestone & Hythe District Council Core Strategy Review Submission Draft (2019) was submitted to the Secretary of State on 10 March 2020. Inspectors were appointed to examine the plan on 19th March 2020 and public hearings were held from 15th to 18th December 2020, from 5th to 12th January 2021 and from 29th June to 1st July 2021. The Inspectors wrote to the council on 1st July 2021 to state that the Core Strategy Review complies with the duty to cooperate and can be made 'sound' by amendment through main modifications. The Inspectors followed up their initial assessment by letter on 16th July 2021, stating that, subject to main modifications concerning detailed policy wording, they consider that the plan's spatial strategy and overall approach to the district's character areas and settlements is sound. The Inspectors find that the housing requirement is justified and that the Core Strategy Review will provide an adequate supply of housing over the plan period and at least a five year supply of housing land at the point of adoption. In accordance with National Planning Policy Framework (2021) paragraph 48, the policies in the Core Strategy

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Review should therefore be afforded significant weight, having regard to the Inspectors' outline of main modifications required.

6.3 The relevant development plan policies are as follows:-

Places and Policies Local Plan 2020

Policy HB1 - Quality Places Through Design

Policy E1 – New Employment Allocations

Policy CC2 - Sustainable Design and Construction

Policy T1 – Street Hierarchy and Site Layout

Policy T2 - Parking Standards

Policy T4 – Parking for Heavy Goods Vehicles

Policy T5 - Cycle Parking

Policy HE1 - Heritage Assets

Policy NE2 – Biodiversity

Policy NE3 – Protecting the District's Landscapes and Countryside

Policy NE5 – Light Pollution and External Illumination

Core Strategy Local Plan (2013)

Policy DSD - Delivering Sustainable Development

Policy SS1 - District Spatial Strategy

Policy SS3 - Place-Shaping and Sustainable Settlements Strategy

Policy SS4 - Priority Centres of Activity Strategy

CSD4 - Green Infrastructure of Natural Networks, Open Spaces and Recreation

Core Strategy Review Submission draft (2019)

Policy SS1 - District Spatial Strategy

Policy SS3 - Place-Shaping and Sustainable Settlements Strategy

Policy SS4 - Priority Centres of Activity Strategy

CSD4 - Green Infrastructure of Natural Networks, Open Spaces and Recreation

6.4 The following are also material considerations to the determination of this application.

Supplementary Planning Guidance/Documents

Kent Downs AONB Management Plan
Policies SD1, SD2, BD5 and AEU14

Government Advice

National Planning Policy Framework (NPPF) 2021

Members should note that the determination must be made in accordance with the Development Plan unless material considerations indicate otherwise. A significant material consideration is the National Planning Policy Framework (NPPF). The NPPF says that less weight should be given to the policies above if they are in conflict with the NPPF. The following sections of the NPPF are relevant to this application:-

Paragraph 11 - Presumption in favour of sustainable development

Paragraph 47 - Applications for planning permission be determined in accordance with the development plan

Paragraph 81 - Support economic growth and productivity

Paragraph 109 - Overnight lorry parking facilities

Paragraph 130 - Achieving well-designed spaces

Paragraph 176 - Conserving and enhancing the natural environment

Paragraph 180 - Habitats and biodiversity

7. APPRAISAL

7.1 In light of the above the main issues for consideration are:

- a) Principle of development
- b) Visual amenity / Design
- c) Residential amenity
- d) Ecology and biodiversity
- e) Contamination
- f) Drainage
- g) Archaeology
- h) Highway safety

a) Principle of development

Cheriton Parc Employment Allocation

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- 7.2 Places and Policies Local Plan policy E1 – part of the recently adopted Places and Policies Local Plan (September 2020) – lists the employment allocations envisaged to meet the employment needs of the district over the course of the plan period to 2031 and beyond. It includes land at Cheriton Parc for 15,000 sqm of B1a uses – which since September 2020 now fall within Class E(g)(i), being offices to carry out any operational or administrative functions. This represents approximately 65% of the total office supply in Folkestone and 30% of the total office supply in the district as a whole. Outside the significant land allocation at Link Park, the next largest employment allocation in the District that is yet to be developed is Cheriton Parc. Core Strategy policy SS4 also directs commercial development toward major employment sites in accordance with the priority centres of activity strategy and protects B Class (now E) uses.
- 7.3 A degree of flexibility is factored into the policy which allows for a discretionary 25% of non-employment uses where it complements and adds to the attractiveness of the business function of the employment site and provided that their position within the employment site is justified and that the uses comply with other retail and leisure policies. In this respect, the 537sqm of proposed café, nursery and gym (all of which now fall within Use Class E) on the ground floor of the proposed extension to the Motis Business Centre would not exceed the 500sqm gross threshold (a locally set threshold recommended as part of the Town Centres Study) for town centre uses as nurseries are not considered to be town centre uses, so a retail impact assessment is not required to be submitted.
- 7.4 The supporting Planning Statement assumes that policy E2 applies to the application site as well. This is not the case. Existing employment sites relate to clusters of economic activity that are actively supporting business uses. The undeveloped area of the application site cannot be both a new employment allocation and an existing employment site. As such officers considers that this policy should not be applicable.
- 7.5 The preparation of the Places and Policies Local Plan was supported by the Employment Land Review (ELR) (2017). In respect of office development it highlights that the supply of office space in Folkestone is comprised of small-to-medium sized offices of older stock, with a limited supply of new office accommodation available in the local market to meet the demand for higher quality office space. Where new office developments have occurred in Folkestone, this new space has mainly been delivered on out-of-centre sites that are strategically located in close proximity to the M20, which makes them more attractive for businesses that require larger sites with good road access. With specific reference to the application site, the ELR it states at para 5.18 that the site benefits from its excellent strategic location and access to the M20, as well as having few barriers to future development, and therefore should be retained for employment uses.
- 7.6 It also recognises at para 8.25 that the key challenge in terms of the future potential office capacity in Folkestone in particular revolves around the delivery of the sizeable office land allocations such as Cheriton Parc. However, it analysed the historic development rates in the district between 2002/03 and 2013/14, identifying that more than 80% of the total employment space delivered in this time was prior to the onset of the economic downturn in 2008, with development levels seemingly yet to recover to pre-recession levels. In addition, it also highlighted the UK-EU referendum in June 2016, and the uncertainty that future arrangements could have on national and local economic change and acknowledges the possibility that delivery of office space at Cheriton Parc may be beyond the Core Strategy Local Plan period. Although at this

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stage, it is considered to be too early to establish how this may affect the long term requirements for employment in the district.

- 7.7 The limited development of new office space in Folkestone, as well as in the wider District, has resulted in much of the available stock being increasingly unsuitable to match the demand from occupiers searching for higher quality office facilities. Such a shortage of high quality office space in Folkestone is seen as the main barrier to attracting new firms to the local market, as well as retaining existing firms in the local market as they look to expand or relocate. Particularly on a site with such good access to the M20.
- 7.8 The absence of a good supply of modern offices in the Folkestone & Hythe District is likely to mean that future enquiries for such office space, could be lost to other locations in the sub-region. The applicant has provided an Office Market Report prepared by commercial agents Sibley Pares, which summarises the prevailing issues associated with the Folkestone office market and would appear to support many of the conclusions made by the ELR above.
- 7.9 The Office Market Report draws upon the current Covid-19 pandemic and references businesses such as SAGA who occupied a significant volume of office space at Bouverie House, Middleburg Square and Cheriton Parc House, Cheriton High Street, who are disposing of their buildings with a view to keeping their staff working from home. The report states that disposal of these two buildings have 'flooded the market with a large quantity of office space'.
- 7.10 Both buildings were marketed in December 2020. No office enquiries were made in relation to Bouverie House in the 3 months prior to being placed under offer for a non-office (residential) use. Although Cheriton Parc House received potential investor interest, the purchase of a vacant office building was deemed too much of a risk at this time in the market, with the only offer forthcoming being from a residential developer. This outcome is not surprising. The marketing period coincided with a national lockdown with office workers advised to work from home; in addition to also being mid-way through a transitional period for changes to the Use Classes Order, whereby a 1,500 sqm upper cap on to office to residential conversions was due to come into force on the 1st August 2021. It is stated that both properties have now been sold and if changed to alternative uses, this would equate to an approximate loss of over 9,000 sqm of some of the highest grade office space in the Folkestone area, resulting in an even greater deficit of modern office floorspace in the Folkestone area.
- 7.11 The report suggests that the impact of working remotely has fuelled demand for small, serviced office space with a number of office buildings converted to provide this type of space on flexible terms on all-inclusive rental basis to offer incentives to attract tenants. It states that there has been an increase in this type of space and as a result there is a large amount of serviced space available. Locations include Basepoint at Shearway Road, Motis Business Centre on Cheriton High Street, The Glassworks at Mill Bay, 127 Sandgate Road, Aspen House on West Terrace, 32-40 Tontine Street and Bouverie House Business Centre along with some smaller serviced office sites.
- 7.12 The applicant has only provided a list of current available office locations. There is no information on size, cost, availability (sale or lease) or marketing periods of available office space. It is also argued that some of the locations such as 127 Sandgate Road and Aspen House are not directly comparable to the type of modern office space that is set to be lost at Bouverie or Cheriton Parc House; or that the local plan seeks to

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deliver on allocations such as Cheriton Parc in order to meet market demand from potential occupiers for modern, high quality office space with good access to the national highway network.

- 7.13 Whilst it is accepted that there may be a shift in how people work which may impact on demand for office space in the future, it is not believed that it is possible to deduce long term trends or the future form of employment space at this stage as businesses are still regrouping and planning their future operation. The ELR emphasises that existing office allocations in Folkestone such as at Cheriton Parc represent important development opportunities if the town is to meet its forecast requirements during the Core Strategy Local Plan period but recognises that there is the possibility that office space at Cheriton Parc is delivered beyond the Core Strategy Local Plan period.
- 7.14 As stated previously, the undeveloped allocation represents about 65% of the total office supply in Folkestone and about 30% of the total office supply in the district as a whole. The site is considered strategically important and one of the last opportunities to provide larger footprint, modern office space in the town that is well-located within the transport network.
- 7.15 It is also noted that the accompanying design and access statement asserts that the existing office space is fully let. The proposal to expand the commercial space offering would suggest that current demand is outstripping supply. It is also considered that the provision of additional facilities such as a gym and crèche could only serve to make Cheriton Parc a more attractive business location.
- 7.16 The Shepway Economic Strategy (2015-2020) sets out the council's ambitions for economic growth in Shepway. The Economic Strategy recognises that the District has many assets upon which to build and to attract further investment; and that there is a need to capitalise on these to attract new businesses that will bring job opportunities to the district and create confidence so that the private sector continues to invest in Folkestone and Hythe District in the future.
- 7.17 One of the priorities of the Economic Strategy is to identify and bring forward appropriate sites for commercial development. It realises that Folkestone Town Centre has no sites available to meet the current demand from larger floorspace users and no suitable existing buildings for conversion. It does highlight that well-located sites are identified as being in and around the districts three M20 junctions, as the application site is.
- 7.18 The ELR 2017 and the Economic Development Strategy (2015 – 2020) formed a key part of the evidence base for the Places and Policies Local Plan to support the Council's strategy to boost the local economy and to increase job opportunities. No objections were raised to the continued allocation of Cheriton Parc throughout the preparation of the Places and Policies Local Plan, which was examined between 2019 and 2020 and subsequently found to be 'sound'.
- 7.19 Consequently, it is clear that this site is a key site for the delivery of office space in the Folkestone and Hythe District area and is specifically identified within Places and Policies Local Plan policy E1 as a site required to support the requirements of local businesses as a key part of a range of industrial sites and premises across the district. This policy protects the identified sites for business uses and the loss of the application site for non-office purposes would be directly contrary to the aims of this policy.

Otterpool Park

- 7.20 The Supplementary Planning Statement makes reference to the outline planning application for Otterpool Park (ref Y19/0257/FH); and a Joint Delivery Statement between FHDC and Otterpool Park LLP published June 2020. It draws attention to the fact that the JDS confirms that as part of the outline planning application, Otterpool Park is proposed to have up to 77,500 sqm (GIA) of B1, B2 and B8 commercial floorspace, 21,000 sqm (NIA) of retail and leisure floorspace in addition to community uses. The applicant has incorrectly concluded that this supply is in addition to the sites allocated under policy E1 of the Places and Policies Local Plan (2020). On the contrary, the allocation at Otterpool Park was meant to compliment and add to the existing employment allocations in the development plan.
- 7.21 Policies SS6 – SS9 of the emerging Core Strategy Review, which seek to allocate the new Garden Settlement, set a requirement for 36,760 sqm net of employment floorspace which may include office, research and development and light industrial uses within Class E, and uses falling within Class B2 and B8, with development beyond the plan period having the potential to provide for approximately 57,600 sqm of employment floorspace in total. This quantum of employment floorspace has been calculated to meet the needs of the garden settlement but also to support a step change in the District economy, with the Otterpool Employment Opportunities Study stating that *“Otterpool Park provides an opportunity to deliver a step-change within the economic growth trajectory of Shepway District. To maximise the opportunities, its economic role must combine both local functions that support the garden town itself but also delivery of a more strategic employment function which the District currently lacks.”*
- 7.22 Consequently, Cheriton Parc offers one of the few opportunities to take advantage of potential future investment as a result the economic benefits that could flow from Otterpool Park, as well as the opportunity to respond to the potential changing employment / office trends post Covid-19 in the Folkestone area given the lack of town centre opportunities.
- 7.23 Policies SS6 to SS9 will supersede the existing allocation in Policy E1 at Link Park for 73,175 sqm of B-class uses. Therefore, this represents a net reduction in the employment land supply by 36,415 sqm from the current adopted plan position; and should also be viewed in the context of an extended plan period from 2030/31 to 2036/37; and rapidly increasing housing targets.
- 7.24 The Otterpool Park Allocation is still to be determined against the emerging policies of the Core Strategy Review. The proposed employment floorspace quoted from the Joint Delivery Statement represent a total figure should potential future growth of the garden settlement to provide 8,000 – 10,000 dwellings be realised. If the full employment floorspace figures mentioned in the Joint Delivery Statement come forward in excess of the policy requirements, then this would still balance against the loss of Link Park allocation and be phased gradually over time with a proportion of this figure delivered beyond the plan period. As such, the position at Otterpool Park is not considered to provide justification for the loss of the current site for office development.

Need for HGV Parking

- 7.25 The NPPF (para 109) highlights that planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into

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account local shortages, to help reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Policy T4 of the Places and Policies Local Plan (2020) seeks to plan positively for HGV parking in the District, where the relevant policy requirements are met.

- 7.26 The applicant has provided correspondence with KCC Highways & Transportation but it is noted that where they acknowledge that overnight HGV parking is an issue in Kent and that provision of lorry parking remains a local and national priority, they do not comment on Folkestone & Hythe District specifically.
- 7.27 The Supplementary Planning Statement suggests that there is a current shortage of between 1000 and 1,200 HGV parking spaces in Kent. It is not understood when and how this figure was calculated and/or whether this figure takes in to account recent added capacity at Ashford, Dover or elsewhere in the County.
- 7.28 The applicant has also referred to the Freight Action Plan for Kent which states that KCC were developing a strategy for a network of small lorry parks at locations across Kent. It presents the results of an overnight parking survey for HGV's in 2016. The average for Folkestone & Hythe District (formally Shepway) was 10 and 12 for each of the surveys undertaken, placing Folkestone and Hythe second to bottom in the table behind Thanet, which had the lowest number recorded. It is understood that further annual surveys were undertaken; however results do not appear to have been published or provided as evidence in support of the application. As such limited weight can be attributed to this.
- 7.29 Overall, although the proposal would supply some additional office and storage / distribution floor space, alongside the employment associated with the lorry park, this would be at a significantly lower density than that which would be possible if the whole allocation was utilised for office-based employment and it is the view of Officers that there is insufficient evidence to adequately establish that there is an overwhelming need for additional HGV parking within the Folkestone & Hythe District on the scale put forward by the proposals that overrides the loss of a significant employment allocation. As such, it is not considered that the adopted policy criteria, which is considered to be up-to-date, should be overridden in favour of the proposed development and that insufficient justification has been provided on these grounds.

b) Visual Impact / Design

Visual Impact

- 7.30 The AONB boundary runs north-south through the centre of this site. The proposed new business units and extension of the existing Motis Centre would be located on the eastern part of the site outside of the AONB but within its setting. The majority of the proposed lorry park and its ancillary facilities would lie within the western part of the site and would be within the AONB.
- 7.31 The tree cover increases towards the western end of the site where it links into woodland running along the railway line and the M20 and larger woodland blocks around the public bridleway HE255 and to the south of the railway. The latter block is identified as Priority Habitat – described as broadleaved, mixed, and yew woodland. This woodland block then links into the Seabrook Stream SSSI. It is noted that the transport corridor to the north has compromised the visual continuity with the AONB and the site is considered to retain few of the visual characteristics of the AONB.

- 7.32 The proposal would be visible from a localised area immediately adjacent to the site where views into the site are currently considered to be of an urban nature and set in the context of the transport corridor and HS1 terminal in longer views. Two long-distance views are identified within the LVIA from the North Downs Way / Saxon Shore Way, as well as a viewpoint from the Folkestone White Horse to the north of the site. The visible elements of the new development would form a portion of the view, viewed behind the mature tree cover along the embankment of the M20 corridor, with the proposed development of the transshipment facility, truckstop, extended lorry park area and light industrial units considered unlikely to significantly alter the composition or amenity value of the view that is currently possible.
- 7.33 Close-range views from Cheriton High Steet would be of the new industrial units and extended part of the existing business centre and would not, given the existing views of the Motis Business Centre, car park, electricity pylons and vegetation running along the railway line, significantly alter the amenity value of the existing views. From footpath HE255, close range views would be of the extended truckstop and transshipment facility which are considered unlikely to significantly or detrimentally alter the amenity value of the views across what is termed a 'degraded' site in the submitted LVIA. The proposed development is considered to have a visual character consistent with the existing nearby uses, and the proposed structures would not be unexpected. The adjacent Premier Inn Hotel already overlooks the existing Motis Business Centre and car park and it is considered that the proposed development would not significantly or detrimentally alter the amenity value of these views, given the context in which it would be sited.
- 7.34 In terms of land use the site is surrounded by transportation infrastructure, with the railway line to the south, the M20 and A20 to the north and the Channel Tunnel Terminal further to the north also. It also supports substantial buildings and hardstanding over much of its surface, and is adjacent to existing B1 - B8 development, with electricity pylons also running across the site. The site does not contribute to the key characteristics of the Kent Downs AONB and it is considered that the likely visual impact arising from the proposed development are relatively limited and relate almost predominantly to the resulting change in land use and cover in the western end of the site. The site is generally visually contained in long distance views by the existing topography of the and by intervening vegetative cover along the transport corridor, with the structures and development as a whole of a scale that would not cause a detrimental change in the wider landscape character, including that of the designated AONB and SLA.
- 7.35 It should also be noted that the site, as a whole, has been allocated for within the Local Plan, so the principle of built development across the site has already been accepted, although it is acknowledged that the final form of this would, of course, be subject to the submission of a planning application.

Design

- 7.36 The transshipment unit, drivers lounge and business units are all individually designed units, whilst the extension to the business centre has been designed to follow the design of the existing. All have a strong utilitarian appearance, with all proposed to be finished with composite panels to match the existing business centre.

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- 7.37 The transhipment building would sit behind the Motis Business Centre to the west and would not be readily visible in views from the street. It would have plain, unrelieved elevations. The drivers lounge would be toward the western end of the site and would not be readily visible. It is a two-storey building but with a shallow, pitched roof. The business units toward the eastern end of the site are two storey also, with a gently-sloping mono pitch and roller shutter doors. The extension to the Business Centre would be flat-roofed to match the existing structure.
- 7.38 The existing character of this part of the site is noted, with the Premier Inn building utilising composite cladding alongside the Motis Business Centre and it is not considered unreasonable for the development to follow this architectural lead, with the variation in the building styles not considered likely to result in any detrimental impact upon the character of the area. The comments of the Kent Downs AONB Unit are noted and in this respect, if permission were granted, it would be considered reasonable to secure details of final materials and colouration via condition.
- 7.39 Overall, it is considered that the proposed development would not be detrimental to the visual character of the immediate or wider area, inclusive of the designated landscapes and their settings, with the design of the proposed buildings also considered acceptable within the context of the site and surrounding development.

c) Residential Amenity

- 7.40 The nearest residential dwellings are to the west in Canada Close, although it is noted that 27 units are currently being constructed at the site of the former Brockman Family Centre (planning reference Y19/1164/FH) which is immediately to the west of the former Saga building, known as Cheriton Parc House.
- 7.41 A Noise Impact Assessment has been submitted with the proposal and showed that the scheme would meet the set noise limits at the noise-sensitive receivers and demonstrating that operational noise from the scheme would be considered to be below the Lowest Observable Adverse Effect Level (LOAEL). The findings of this report have been accepted by the Council's Environmental Health Officer.
- 7.42 Whilst there would be an increased number of vehicle movements along the section of Cheriton High Street leading to the application site that would be associated with the proposed change of use and expansion of the site, these are considered unlikely to result in a significant detrimental impact to residential amenity from noise and disturbance. Further, it is considered that as the site has already been allocated for commercial development, additional vehicle movements have already been accepted in principle for this site. However, the allocation is in respect of office use with the proposed use focused primarily on HGV movements.
- 7.43 In relation to air quality, the proposals have the potential to cause air quality impacts as a result of dust emissions during construction together with road traffic exhaust emissions associated with vehicles travelling to and from the site during operation. The submitted air quality assessment concludes that the use of good practice control measures would provide suitable mitigation and reduce potential impacts to an acceptable level in respect of dust, the details of which could be secured via suitably worded condition, should permission be granted.

7.44 In respect of exhaust emissions, modelling results indicated that predicted air quality impacts as a result of traffic generated by the development were not significant at any sensitive location in the vicinity of the site.

d) Ecology and Biodiversity

7.45 The submitted Preliminary Ecological Appraisal (PEA) identified that the east of the site supports a small semi-improved grassland paddock with species-poor hedgerow, whilst the rest of the site supports disturbed ground, grassland, hedgerow, and young deciduous woodland and scrub habitat.

7.46 The main findings of the report were that:

- Potential for reptiles to be present
- Potential for dormouse to be present
- The site supports open mosaic habitat (OMH)
- The OMH provides suitable habitat for rare or scarce invertebrate
- Suitable habitat for breeding birds
- Badger scull recorded – but in the areas surveyed no signs of badgers present
- Suitable habitat for hedgehogs
- At least 2 species of foraging bats recorded within the site

7.47 The report recommends a largely precautionary mitigation or avoidance to demonstrate that impacts on protected species (through the direct loss of habitat) can be avoided and KCC Ecological Advice Service have reviewed the documents and accept that conclusion, although they highlighted that no information had been submitted demonstrating that appropriate mitigation for the open mosaic habitat (and associated invertebrate population) could be achieved.

7.48 Supplementary work, also subsequently reviewed by KCC Ecological Advice Service, confirmed an updated site assessment was carried out and mitigation proposed in the form of creating a new area of OMH along the northern boundary of the site where there is currently an area of amenity grassland present, with existing habitat translocated and the overall quality increased. A method statement would be employed to ensure that no harm would come to any potential reptiles present on site.

7.49 In relation to badgers, no further evidence of badgers was found on site and they are not considered to be present on site or within a 30m buffer of the site, with no further mitigation required. Additionally, for bats, following the initial surveys, further surveys were carried out, with very low levels of bat activity recorded across the site.

7.50 In respect of lighting, as the proposed development would result in a significant increase in artificial lighting across the site, a bat sensitive lighting scheme would need to be implemented, especially adjacent to site boundary habitats. A dark corridor plan was provided and the supplementary statement confirmed that the strategy would implement a dark corridor, with illuminations contained within the centre of the sites core development zone, which gradually reduces through a transition zone towards the north, south and west boundary of the site until reaching the dark corridor where a maximum luminance level of 1 lux and less would be achieved, satisfying the requirement to maintain the boundaries of the site as a wildlife corridor.

7.51 In relation to the Seabrook Stream SSSI, which is not within the application site, the Traffic and air quality modelling work undertaken indicated that the proposed

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development would be unlikely to result in significant adverse effects upon nitrogen-sensitive habitats, as although the Seabrook Valley SSSI designation is situated within 200m of an affected road link (the westbound sliproad of the M20) sensitive site features are unlikely to be present within the relevant distance criteria and concluded that in accordance with Natural England guidance, the proposed development is unlikely to have a significant air quality impact on the designation and further assessment is therefore not considered to be necessary.

- 7.52 However, the submitted PEA suggests a precautionary approach is taken and recommends that a botanical walkover survey of the 15m wide band of the SSSI that falls within the 200m radius from the road will need to be undertaken to confirm whether or not it supports lowland acid grassland, which is a nitrogen sensitive habitat and a Natural England monitoring feature for the SSSI. As highlighted by KCC Ecological Advice Service, this has not been undertaken.
- 7.53 Consequently, the presence of lowland dry acid grassland within the 15m-wide section of the SSSI that falls within the very outer extents of the 200m radius of the link road cannot be completely ruled out and further air quality assessment work may be required to determine whether the 11 development-specific lorry trips will result in any ecologically significant nitrogen deposition within this area of the SSSI.
- 7.54 Consequently, it is considered that there is potential for harm to a nationally important site, with nothing to outweigh the likely impact on the lowland dry acid grassland within the site that make up the special scientific interest. It is considered that in the absence of this information, the Local planning Authority is unable to confirm that the proposed development is acceptable on these grounds contrary to Places and Policies Local Plan NE3, Core Strategy policy CSD4 and NPPF paragraph 180 and as such it is considered that it should be refused on these grounds.

e) Contamination

- 7.55 The application has been accompanied by a Phase 1 desk top study which has found that no significant historical land uses have been identified on site which could have caused contamination of the shallow soils, whilst the proposed commercial development with a lorry park is considered to have low sensitivity from a human health perspective. No further formal intrusive land contamination assessment is required, although a watching brief for any unexpected contamination should be maintained throughout the works, as secured by suitably-worded condition, if permission were to be granted.

f) Drainage

- 7.56 The site is in flood zone one according to the Environment Agency flood risk mapping and the proposal has been accompanied by a Flood Risk and Drainage Statement which identifies that the risk to the proposed development is low, concluding that infiltrating runoff into the ground will present the most viable solution for managing runoff, with a combination of permeable surfacing and soakaways proposed to be incorporated into the proposed development.
- 7.57 This strategy has been accepted by the relevant consultees, subject to the submission of details of the sustainable surface water drainage scheme as part of a suitably-worded condition, should permission be granted.

g) Archaeology

7.58 The site is in an area of archaeological potential for major planning applications only, but it has been noted by KCC Archaeology that the site was subject to archaeological evaluation and monitoring in 1988 and 1992 by Canterbury Archaeological Trust with negative results despite prehistoric and Romano-British archaeological remains having been discovered in the surrounding area. Taking account of the results of past archaeological work at the site it is considered unlikely that the proposed works will have any significant archaeological impact.

h) Highway Safety

7.59 The submitted information within the Transport Statement shows that:

- Trip generation: a proposed overall total of 34 AM (two-way) and 35 PM (two-way) trips during the peak hours;
- Lorry Parking Trip Generation: the Lorry Park is proposed to increase the number of parking spaces to 115 in total, but these movements are tidal and generally occur outside the highway peak hours, at approximately 05:00-06:00 and 19:00 – 20:00 hours;
- Controlled Parking: The Lorry Park operates in a controlled manner via a booking system, which would prevent any HGVs from turning up on an ad-hoc basis.

7.60 The Highways Agency have reviewed this information and are content that the volume of traffic associated directly with the proposed lorry park will be effectively managed and that the quantum of traffic proposed within the highway network peak hours would not create an unacceptable impact on the safety, reliability and/or operation of the strategic road network, with particular reference to M20 junction 12.

7.61 With regard to access and layout, the proposal has been reviewed by KCC Highways and Transportation who have advised that the existing access junction onto Cheriton Road is considered adequate and has safe visibility, with the proposed layout also allowing for safe access to the proposed commercial units. Taking account of the existing on site layout with the spare capacity available for the current operation, there is adequate parking to cater for the additional proposed uses.

7.62 Turning to the lorry park, the proposed looped access road allows flexibility of access and the current access road enables queuing away from the highway in the event of several vehicles arrive at once. The access junction to this section of site from Cheriton High Street is existing, of suitable size for the large vehicles and has adequate visibility. Localised road widening has been proposed on Cheriton High Street to allow for a six-metre carriageway, with the exception of a short section where this is not possible, although this section has ample forward visibility. The 'pre-booking only' format for lorry park users would prevent abortive trips for large vehicles on the surrounding highway network. Vehicle tracking drawings have been provided for both the site and the highway approach and junctions, these are acceptable and demonstrate safe access for HGV's.

7.63 The primary concern when assessing traffic impact is the additional vehicles added to the surrounding highway network in the AM and PM traffic peak hours. For this application, all of the proposed uses listed above combined result in an additional 34 two way trips in the AM 0800-0900 traffic peak hour (22 arrivals and 12 departures)

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and 35 two way trips in the PM 1700-1800 peak hour (15 arrivals and 20 departures). This volume of traffic cannot be considered severe in nature and as such traffic impact of the proposal does not warrant objection from the local highway authority. As such, Officers also considered that the application would be acceptable on highway grounds.

Environmental Impact Assessment

7.64 In accordance with the EIA Regulations 2017, this development has been considered in light of Schedules 1 & 2 of the Regulations and the threshold is not relevant as the application site is within a sensitive area of the Kent Downs AONB. A screening opinion will be carried out by the Council prior to determination.

Local Finance Considerations

7.65 Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that a local planning authority must have regard to a local finance consideration as far as it is material. Section 70(4) of the Act defines a local finance consideration as a grant or other financial assistance that has been, that will, or that could be provided to a relevant authority by a Minister of the Crown (such as New Homes Bonus payments), or sums that a relevant authority has received, or will or could receive, in payment of the Community Infrastructure Levy.

7.66 In accordance with policy SS5 of the Core Strategy Local Plan the Council has introduced a Community Infrastructure Levy (CIL) scheme, which in part replaces planning obligations for infrastructure improvements in the area. This application is not liable for the CIL charge as it is development that does not fall within the charging schedule.

Human Rights

7.67 In reaching a decision on a planning application the European Convention on Human Rights must be considered. The Convention Rights that are relevant are Article 8 and Article 1 of the first protocol. The proposed course of action is in accordance with domestic law. As the rights in these two articles are qualified, the Council needs to balance the rights of the individual against the interests of society and must be satisfied that any interference with an individual's rights is no more than necessary. Having regard to the previous paragraphs of this report, it is not considered that there is any infringement of the relevant Convention rights.

Public Sector Equality Duty

7.68 In determining this application, regard has been had to the Public Sector Equality Duty (PSED) as set down in section 149 of the Equality Act 2010, in particular with regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it. It is considered that the application proposals would not undermine objectives of the Duty.

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It is considered that the application proposals would not conflict with objectives of the Duty.

Working with the applicant

- 7.69 In accordance with paragraphs 38 of the NPPF, Folkestone and Hythe District Council (F&HDC) takes a positive and creative approach to development proposals focused on solutions. F&HDC works with applicants/agents in a positive and creative manner.

8. CONCLUSION

- 8.1 The proposed use of the majority of the application site as a lorry park, despite the increase in commercial floor space from the proposed extension and new commercial units, is not supported by evidence to establish a need for additional HGV parking within the Folkestone & Hythe District on the scale put forward by the proposals that overrides the loss of a significant employment allocation within the very recently adopted local plan. Further, there is insufficient evidence to demonstrate that a detrimental impact upon the adjacent Seabrook Stream SSSI from the proposed development. For these reasons, it is considered that the proposed development would give rise to significant material planning harm and the application is therefore recommended for refusal.

9. BACKGROUND DOCUMENTS

- 9.1 The consultation responses set out at Section 5.0 are background documents for the purposes of the Local Government Act 1972 (as amended).

1. RECOMMENDATIONS

That planning permission be refused for the following reasons:

1. The proposed lorry park would utilise land allocated for office purposes in the adopted Local Plan, and would significantly compromise the supply of future employment land required to meet the forecasted office space requirements for both Folkestone and the District as a whole over the Local Plan period. The loss of this site from the adopted policy position would result in the district being unable to meet this requirement and therefore would harm its ability to provide suitable office accommodation in the future. The proposed development is therefore contrary to Places and Policies Local Plan policy E1, Core Strategy policy SS4 and emerging Core Strategy Review policy SS4.
2. Insufficient evidence has been provided to demonstrate that the proposed development would not give rise to a detrimental impact on the adjacent Seabrook Stream Site of Special Scientific Interest. In the absence of this information, the Local Planning Authority is not satisfied that lowland dry acid grassland is not present within adjacent section of the SSSI, nor that the proposed development would not cause harm to a location of national importance. The application is therefore contrary to Places and Policies Local Plan policy NE2, Core Strategy policy CSD4, Core Strategy Review policy CSD4 and National Planning Policy Framework paragraphs 174 and 180.

Informative:

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1. Your attention is drawn to the fact that this refusal of planning permission is on the basis of submitted drawings:

2597 - 110 A Proposed Drivers Lounge floor plans; 2597 - 104 Proposed Business Centre Floor Plans; 2597 - 105 Proposed Business Centre Elevations; 2597 - 112 Proposed floor plan; 2597 - 103 A Proposed Lorry Park Zone Layout Plan; 2597 - 109 A Proposed Floor Plans and elevations Units 1-6; 2597 - 102 B Proposed Site Layout Plan; 4982-LLB-XX-XX-DR-L-0001-S4-P03 Landscape Masterplan; 44606_5501_009A - HGV tracking in site layout; 2597 - 113 Proposed floor plans and elevations of Transhipment building; 2597 - 111 Proposed front, rear and side Elevations.