

Gedney, Oliver

From: Grant, David
Sent: 02 November 2021 16:03
To: _planningadvice
Subject: FW: Freshlinc H14-0391-21
Attachments: We sent you safe versions of your files; letter to Mr D Grant - 17 10 21.pdf

Please add this email and attachment to the DIP button under 6SUP – Storage - supporting information.

Many thanks,

David Grant | Senior Planning Officer | **South Holland District Council**

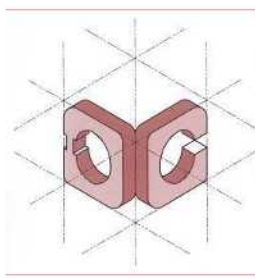
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DC Architectural Services Ltd

Architectural and Planning Services

DB/STB/

27 September 2021

South Holland District Council Planning Department

Dear Mr Grant

Planning Application Ref H14/0391/21

The Company

Freshlinc is locally owned important employer operating both locally and nationally, it offers around 400 jobs locally and employs around 500 group wide. The company also supports numerous other local suppliers who provide supporting goods and services essential to the business operation. Freshlinc recognize the need for smaller storage which it is unable to offer at present to support local people and smaller or startup businesses

Comment

We firstly would like to comment that the application has been with your department since May and has long since passed the time when my client is entitled to appeal on the grounds of non-determination which we have withheld as the senior planning officer had assured us that it has an officer's report with a "recommend to approve" and only workload is delaying applications progress.

The sites current planning status

The current Local Plan identifies the area as Local employment areas reserved for B1, B2 and B8. The area was approved for B1, B2 and B8 in 1992 and 1999, those approved contained no restrictions on the scope within that use or rate of employment per hectare. This is a live application. Whilst we accept planning policy can change, existing approvals cannot be amended retrospectively.

The Application site areas and employment

The development consists of the storage units yard, turning, internal access, loading docks and chill storage application site is 1.4 ha, whole Freshlinc site is 6.4 ha.

The container site offers direct employment at 5 per hectare

The whole application site offers 26 per hectare

The whole Freshlinc offers 62.5 per hectare

Perhaps we should break the site down into smaller elements and find the car park an unacceptable employment density as it will have no staff.

The Site Availability and Marketing and flexible planning approach

Plot has been on the market since 1992 and has been waste land for almost 30 years. The site of approximately 3.5 acres is on the Warden tree park industrial site at the end of Bervor Close between Jewsons and screwfix.

The site has been wasteland since that time on the open market but has but has not secured any development in that time. Policy suggests approval should be given to applications utilizing unused sites.

Employment Levels

The level of employment of this element of the box store development is indeed low per ha, however the direct on the site employment does not show the full picture as there will be supporting employment to staff operating the company such as accounts and maintenances together with letting agents.

It is anticipated that there will be an uptake from local small or start up businesses who are looking at extra or start up storage space which will lead to other sources of employment needing storage space for their business.

Of course, if the level of employment per hectare of part of an application should be basis for refusal one could argue that the drivers parking area offering no employment should also be refused.

Alternatively, Freshlinc could remove the containers from the application and leave the area as waste land and zero employment as it has been for 30 years.

The previous referred to application

In the notes you have provided a different application site which has been refused and is now being offered as a reason for refusal on the basis of “consistency” this clearly is not a valid reason to blanket refuse all of the same type of application in the area. We are all repeatedly by told by planners that each application is considered on its own merit.

It is our belief the “other” application was refused inappropriately as it went to committee with an officers “recommended to approve” clearly indicating a senior planning officer recognizes a compliance to planning policy. So perhaps incorrectly refusing one application should not be reason to incorrectly refuse another.

South Holland Planning Policy 7 and Employment

The policy aims at 34 jobs per hectare, however it does not state each application in the designated must reach these levels perhaps it is intended to be on average over the area as B1, B2 and B8 have vastly different employment densities as shown in Governments Department of Home and Community Agency Employment Density Guidance. It is expected that only a very few B8 applications could ever reach the levels suggested by SHDC. For example a long-term cold store could never meet this expectation but would be wholly appropriate in the area. Another example would be car sales lot and showroom.

I could go on.

The SHDC local plan is suggesting an employment ratio of 34 per hectares with no justification for this number, the Governments Department of Home and Community agency employment density guidance quantifies employment density in terms of m² of building per employee the chill/office building should be 25 – 115m² per employee dependent storage type, racking densities, product stored and automation.

Based on the above document a B8 development of this floor are should generate between 105 and 23 jobs , the proposal is within that range and therefor complies with government guidance on employment.

Clearly B8 is a relatively low density per m² and when applied to the site as a whole where typically operational areas, turning, parking etc the ratio of the site to building is typically 75/25 on SHDC basis a 1.4 hectare site should operate $1.4 \times 34 = 47.6$ jobs. Our proposal operates 37 jobs which we believe not sufficient reason to justify a refusal.

Based on the 75/25 site/building ratio generally required by B8 uses the site would never operate the 34 persons per hectare suggested by P.7. Equally a minus 20 cold store which operates at even lower employment levels would also not reach these levels of employment per hectare. A slightly different application type for example car sales and showroom would also fail, we could go on. It is our view that the policy is flawed in this respect.

Withdraw part of application

The local authority suggestion that the container part should be withdrawn from this application and then the 'building' would be approved is non serviceable as doing this will fail to provide further employment of any sort as it will be left as wasteland and in reality reduce the employees per hectare to a lower level than is currently proposed.

National Planning Policy

The principles of National Planning Policy are :-

- Assumption to approve
- Promote and support the development of under utilized land and buildings.
- "at the heart" of national planning policy favor of sustainable development
- the government is committed to ensuring that planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore, significant weight on the need to support economic growth through the planning system.

Conclusion

This application is made on land with the benefit of outline planning permission H14 – 0869 – 20 for B1, B2 and B8 on this basis the only consideration for this application should be limited to those matters reserved by that approval. Further and later planning policies are not relevant to this application, however, for compliance they are considered and found that there is no conflict with the current proposals and new policy.

Yours sincerely

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David Biggadike
DC Architectural Services Limited

