

Ref:AH/EK/6359/04(08July2025)GBC

Gravesham Borough Council
Planning Department
Civic Centre
Gravesend
DA12 1AU



08 July 2025

Dear Sir/Madam

APPLICATION FOR FULL PLANNING PERMISSION FOR MINOR WORKS AT: ALGECO UK LIMITED, WHARF ROAD, GRAVESEND, DA12 2RU.

Peacock + Smith have been instructed by our client, Algeco UK Limited (company no. 147207), to prepare and submit a full planning application for minor works across their site at Wharf Road, Gravesend, Kent, DA12 2RU.

The application seeks approval for minor works, including the installation of a new jet wash zone, dedicated pedestrian routes demarcated by Armco barriers, and additional parking spaces. The proposal also includes internal site reorganisation to enhance overall efficiency and safety.

The application has been submitted electronically via the Planning Portal and, in addition to this letter and the duly completed application form, includes the following supporting items.

- Site Location Plan – Ref: GRA-PHP-ZZ-XX-DR-A- 4779-001-P02;
- Site Plan as Existing – Ref: GRA-PHP-ZZ-XX-DR-A-4779-002-P04;
- Site Plan as Proposed – Ref: GRA-PHP-ZZ-XX-DR-A-4779-003-P05;
- Armco Barrier Specification; and
- Flood Risk Report, prepared by Perega Ltd - Ref: G28565-PER-XX-XX-RP-C-00001 – Rev. P.3.

Algeco UK Limited is a UK-based company who specialise in providing modular building solutions, both temporary and permanent, for various sectors like education, healthcare, and construction. Algeco UK Limited offers a wide range of portable and modular buildings, including site accommodation, temporary modular buildings, and permanent, multi-story structures. They operate a large fleet of modular buildings from multiple locations across the UK, including that at Gravesend.

Site Location and Description

The Application Site is located on Norfolk Road Industrial Estate, a much larger industrial estate. Surrounding land uses include warehouses, storage and distribution depots and other industrial uses. Nearby properties are located past the railway line to the south on Waterton Avenue and Raphael Road.

Access to the site is from Wharf Road, which borders it to the south. The Site is also bordered by other industrial premises to the east, south, and west. Residential properties are located approximately 100 metres to the south, beyond the railway line, and around 195 metres to the west. The site lies within Flood Zone 3, indicating a high risk of flooding from rivers and the sea.

The Site is located within a designated industrial area (Norfolk Road Industrial Area), according to the Gravesham Local Plan Policies Map. Paragraph 4.5.16 of the Local Plan outlines Norfolk Road Industrial Area (sub-area 2.4) as comprising 'the area lying south of the alignment of the former Thames and Medway Canal extending from the Canal Road Industrial Site and the Canal Road Gasholders site 450 metres to the east to Mark Lane. It is currently well occupied by a range of businesses.' To the south of the site is Key Site 2.1 – Canal Basin Regeneration Area, which proposes a mix of residential, commercial, and employment uses.

Planning History

There is no relevant planning history for this site.

Proposed Development

The proposal seeks approval for minor works on site, including the installation of a new jet wash zone on the northwestern side and a dedicated pedestrian route extending from the eastern boundary to the existing workshop building on the western boundary. The pedestrian route will be clearly demarcated by the installation of Armco barriers. Additionally, the proposal includes the creation of five additional car parking spaces, increasing the total parking provision on site from 18 to 23 spaces.

The proposal also involves internal site reorganisation aimed at enhancing the efficiency and safety of HGV movements within the site. While these reorganisation works do not require formal planning permission, they are included here for completeness.

Furthermore, Algeco UK Limited intends to remove four existing containers currently used as part of the on-site office accommodation. Although the removal of these containers does not require planning permission, this is also referenced for completeness.

Planning Policy

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the determination of planning applications to be made in accordance with the Statutory Development Plan unless material considerations indicate otherwise.

The Development Plan for Gravesham currently consists of the Gravesham Local Plan Core Strategy and Local Plan Policies Map (2014), the Gravesham Local Plan First Review (1994) – saved Policies and the Kent County Council Minerals and Waste Local Plan 2013-30 (2020). The National Planning Policy Framework (NPPF) (2024) is also a material consideration for this planning application.

Relevant planning policies include:

Gravesham Local Plan Core Strategy

- CS01 (Sustainable Development)
- CS02 (Scale and Distribution of Development)
- CS04 (Gravesend Riverside East and North - East Gravesend Opportunity Area)
- CS07 (Economy, Employment and Skills)
- CS11 (Transport)
- CS18 (Climate Change)
- CS19 (Development and Design Principles)

National Planning Policy Framework

- Section 2 (Achieving Sustainable Development)
- Section 6 (Building a Strong, Competitive Economy)

Planning Considerations

Principle of Development: Section 2 of the NPPF sets out a presumption in favour of sustainable development. This means approving development proposals that accord with an up-to-date development plan without delay. Local Policy CS01 (Sustainable Development) aligns with this overriding planning objective.

Paragraph 85 of the NPPF outlines 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 needs to support economic growth and productivity, considering both local business needs and wider opportunities for development'.

The Application Site is located within an Opportunity Area (Gravesend Riverside East and Northeast Gravesend Opportunity Area) and designated Industrial Area (Norfolk Road Industrial Area), according to the Gravesham Local Plan Policies Map.

In reference to Norfolk Road Industrial Area, GLPCS Paragraph 4.5.17 states that:

'The current role of this area should continue over the plan period as it is an important component of existing employment land supply. Proposals to improve the environment of the area will be supported'.

Moreover, Paragraph 5.1.5 outlines that

'One of the Council's areas of focus is to ensure that sufficient provision is made for B class employment, which includes offices, industrial and storage and distribution uses, and the range of job opportunities that this can provide.'

The various minor works will improve the efficiency of the onsite operations and are therefore fully in-keeping with the objectives of the local plan for the Gravesend Riverside East and Northeast Gravesend Opportunity sub-area Norfolk Road Industrial Area.

Considering the minor nature of the proposed development, which will not result in an increase in floor space or change the current use of the site, the Principle of Development should be accepted in accordance with paragraph 85 of the NPPF and Core Strategy Policy CSTEP6 (Strategic Employment Provision) which aims to protect industrial areas.

Flood Risk: Paragraph 5.14.36 states that, with the exception of previously developed sites along the Thames Riverside (see Policies CS03, CS04, and CS05) and other regeneration sites already evaluated in accordance with the sequential and exception tests at the application stage, development will be directed sequentially to areas at the least risk of flooding. As the site is previously developed land located along the Thames Riverside, neither the sequential test nor the exception test applies to this development, despite its location within Flood Zone 3.

The proposed development is minor in nature and will not change the use of the site or its flood vulnerability classification. Accordingly, it is not expected to impact the current flood risk within the site area.

This conclusion is supported by a Flood Risk Assessment (FRA) prepared by Perega Ltd. The FRA identifies the site as being at medium risk of fluvial, groundwater, and surface water flooding. However, contrary to the Environment Agency flood maps, no groundwater was observed on site, and the site benefits from the Thames flood defences, which significantly reduce fluvial flood risk. The report also notes that, as the development is on a brownfield site, there will be no changes to the existing surface water drainage network. Additionally, the development will not affect the impermeable area, as the site is currently entirely hardstanding or roofed. Therefore, the proposed development is not considered to increase flood risk.

Furthermore, the FRA confirms that foul water will be discharged in line with existing arrangements. Moreover, existing private sewers will continue to convey surface water to a nearby brook, ensuring on-site drainage is appropriately managed.

In light of the FRA's conclusions, the proposed development is considered to be in accordance with Policy CS16 (Climate Change)

Transport: The proposed development aims to enhance on-site arrangements for HGVs, cars, and workers. These improvements will be achieved through the reorganisation of the site layout, along with an increase in car parking and the introduction of dedicated pedestrian routes.

The nature of operations on-site will remain unchanged, and the proposed works are minimal. As the development will not affect vehicle movements to or from the site, there will be no impact on the surrounding highway network. The development is therefore considered to be in accordance with Policy CS11.

Conclusions

The application adheres to all relevant policies and legislation. As such we respectfully request that this application is granted full planning permission without delay.

The appropriate fee has been paid via the Planning Portal to Gravesham Council via the Planning Portal. The fee was calculated using the most up-to-date information and has been submitted along with the application.

Should you have any queries regarding this application, please do not hesitate to contact Anna Heyes via email at anna.hey@peacockandsmith.co.uk or telephone 07539 807590. We look forward to receiving receipt of your written confirmation of this letter, other drawings and included documents.

Yours faithfully,



Anna Heyes

Peacock + Smith