

Construction of Low Voltage Cabinets and associated cabling
Grassed Area, Land to North of Elizabeth Gardens
West Street, Gravesend
Planning Statement and Design and Access Statement
February 2026

Project background:

This application seeks full planning permission for the construction of Low Voltage Cabinets and associated cabling at this location, situated at the northern end of Elizabeth Gardens, West Street in Gravesend, on an existing grassed area:

The Port of London Authority (PLA) is a Statutory Harbour Authority for the Tidal Thames, acting as custodians for the river across 95 miles from Teddington in West London into the Thames Estuary. The PLA works to keep commercial and leisure users safe, protect and enhance the environment and promote the use of the river for trade and travel. The Port of London oversees 230,000 vessel movements handling over 53 million tonnes of cargo each year and is currently the largest Port in the UK.

Planning History and designations:

There have been no planning applications on this specific site, however the planning history for the surrounding area is set out below:

Plan reference: 20220075

Address: West Street Pier West Street Gravesend Kent DA11 0BS

Application: Application for a Lawful Development Certificate for a proposed new pier

Status: Certificate Granted 14 April 2022

Plan reference: 20210708

Address: Ferry Office West Street Gravesend Kent DA11 0BS

Application: Application for a Lawful Development Certificate in respect of the proposed change of use from E(g)(i); offices to carry out any operational or administrative functions, to Class E(e); provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner).

Status: Certificate Granted 9th November 2021

Plan reference: 20210708

Address: Ferry Office West Street Gravesend Kent DA11 0BS

Application: Application for a Lawful Development Certificate in respect of the proposed change of use from E(g)(i); offices to carry out any operational or administrative functions, to Class E(e); provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner).

Status: Certificate Granted 9th November 2021

The Grassed Area at Land to the North of Elizabeth Gardens has the following planning policy designations:

- Located just outside of the High Street & Queen Street Conservation Area but within the buffer zone.
- Flood Risk Area (Flood Zone 3)



Figure 1: Existing grassed area at northern point of Elizabeth Gardens Access road.

To the north of the site is the Tidal Thames, with an existing footpath along the riverside, to the east of the site is Elizabeth Gardens, a small public realm area located within the High Street & Queen Street

Proposed Development:

The required infrastructure comprises 2no. Low Voltage (LV) Cabinets, (also referred to as Feeder Pillars) and other associated electrical equipment and cabling. The cabinets are galvanized mild steel with a height of 2,000mm, width of 2,850mm and a depth of 600mm

The proposed development seeks to provide small-scale infrastructure which is required to facilitate a future shore power installation project at the site in association with the proposed new pier at West Street Pier. The need for this proposal is underpinned by the requirement to transition to net zero emissions. By providing adequate grid connected electrical power services marine operators using the pier in the future will be able to move away from burning diesel in generators (either onboard or temporary pier-side generators) to zero emissions at source electrical power. This infrastructure has the capacity to deliver net zero operations for the next thirty years.

To confirm as part of the proposals there will be no permanent staff based on site – the infrastructure will only be used for housing the required equipment and will only have staff on site when maintenance or checks are required.

There will be no changes to existing boundary treatments as a result of the proposed development and the site will not be blocked off as a result of infrastructure installation.

Planning Policy:

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

The Statutory Development Plan for Gravesham Borough Council comprises:

- Gravesham Local Plan Core Strategy and Local Plan Policies Map (2014); and
- Gravesham Local Plan First Review (1994) – Saved Policies.

Gravesham Borough Councils Development Plan is also supported by a range of Supplementary Planning Documents (SPD's).

National Planning Policy Framework (NPPF) (December 2024)

The NPPF 2024 contains national planning policy and sets out the Government's intentions for the planning system and how these are expected to be applied. The Government's National Planning Practice Guidance (NPPG) is also relevant to the determination of this application.

The overarching national planning policy theme evident from the NPPF is a presumption in favour of sustainable development, which the Government has advised should be at the heart of the planning system. In terms of development management, it advises that the primary objective is to foster the delivery of sustainable development and should not hinder or prevent future development.

Chapter 2 seeks to promote sustainable development. Paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development, which includes the provision of supporting infrastructure in a sustainable manner.

Paragraph 8 outlines the three overarching objectives (social, environmental, and economic) which underpin sustainable development. These objectives are considered to be interdependent and need to be pursued in mutually supportive ways.

Chapter 6 (Building a strong, competitive economy) of the NPPF seeks to ensure that planning policies and decisions create conditions in which businesses can invest, expand, and adapt.

Chapter 9 (Promoting sustainable transport) seeks to promote sustainable transport, with paragraph 109 stating that transport issues should be considered at the earliest stages of development proposals, which should involve:

- a) making transport considerations an important part of early engagement with local communities.
- b) ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.
- c) understanding and addressing the potential impacts of development on transport networks.
- d) realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated.

- e) identifying and pursuing opportunities to promote walking, cycling and public transport use; and
- f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.

Chapter 14 (Meeting the challenge of climate change, flooding and coastal change) seeks to ensure that the planning system supports the transition to a low carbon future in a climate changing climate, taking full account of flood risk and coastal change. Policies and decision should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions and support renewable and low carbon energy and associated infrastructure.

Paragraph 168 states that in determination planning applications for renewable and low carbon development LPA's should not require applicants to demonstrate the overall need for renewable or low carbon energy and recognise that even small-scale projects provide a valuable contribution to significant cutting greenhouse gas emissions.

Annex 3 (Flood risk vulnerability classification) classifies infrastructure located in a flood risk area for operational reasons, including infrastructure for electricity supply to be essential infrastructure.

Gravesham Borough Council Development Plan

Gravesham Local Plan Core Strategy (2014)

The Gravesham Local Plan ('Local Plan') was adopted in September 2014. This document sets out a spatial vision for the district which acknowledges the importance of retaining the commercial functioning of the River Thames as a working river.

The relevant policies within the Local Plan are:

- Policy CS01: Sustainable Development
- Policy CS07: Economy, Employment and Skills
- Policy CS11: Transport
- Policy CS18: Climate Change

- Policy CS19: Development and Design Principles Material Considerations
- Policy CS20: Heritage and the Historic Environment

Gravesham Climate Change Strategy (2022-2030) (Version 3 Oct 2025)

In 2019 the Council declared a Climate Emergency, pledging to act and prepare the borough to be net zero by 2030. Its recent Climate Change Strategy sets out a number of ambitions around various topics, including

- Transport & movement
- Buildings and energy efficiency
- Low carbon business and industry
- Waste production & Resource consumption
- Land Use & Biodiversity
- Community Engagement & Green Skills
- Council Assets & Fleet

Planning Practice Guidance (PPG) – Climate Change (2019)

This PPG advises how to identify suitable mitigation and adaption measures in the planning process to address the impacts of climate change. Addressing climate change is one of the core land use planning principles which the NPPF expects to underpin both plan-making and decision-making (Ref ID: 6-001-20140306). This requirement is underpinned the Climate Change Act 2008 which establishes a legally binding target to reduce the UK's greenhouse gas emissions by at least 80% in 2050, from 1990 levels (Ref ID: 60-002-20140306). The PPG lists four examples of how climate change can be mitigated, by reducing emissions, of relevance are the following two points (Ref ID: 6-003-20140612):

- Reducing the need to travel and providing for sustainable transport; and
- Providing opportunities for renewable and low carbon energy technologies

Thames Estuary Plan 2100 (TE2100) (2023)

The Thames Estuary Plan ("TEP") is a key national policy document prepared by the Environment Agency (EA) and the Department for Environment, Food and Rural Affairs (DEFRA). The plan outlines

how stakeholders should adapt to climate change along the Thames Estuary and it sets out the vision for the estuary's future.

Gravesham Borough Council comprises one of the 23 policy units along the Thames Estuary. The Thames Estuary 2100 Plan (2023) sets out three main aims:

- A - Take an adaptive approach to manage tidal flooding and create climate resilient communities.
- B - Protect and enhance the value of the Thames, its tidal tributaries and floodplain. Deliver social, cultural, and commercial benefits for communities and support resilient growth.
- C - Tackle the climate and nature crises by putting sustainability at the heart of this Plan. Restore ecosystems, reduce carbon emissions, and deliver environmental and biodiversity net gain.

Objective 6 states that proposals should embed carbon reduction pathways within the Plan, striving to achieve net zero carbon status.

Port of London Authority (PLA) The Net Zero River Plan 2024-27 (2024)

The Net Zero River Plan, prepared by the PLA, states that it is committed to enhancing its environmental performance in order to achieve net zero prior to the Government's target of 2050. The Plan seeks to achieve Net Zero by 2040. A copy of the PLA Net Zero River Plan is enclosed under Appendix 1.

Appraisal of proposed development against planning policy:

Design and Visual Impact

Policy CS19 'Development and Design Principles' of the Local Plan requires new development to incorporate sustainable construction techniques, be adaptable to reflect changing lifestyles, and be resilient to the effects of climate change, including delivering carbon reduction. Policy CS19 also requires new development to be visually attractive, fit for purpose and locally distinctive. New development is required to safeguard the amenity of its occupants and neighbouring properties/ land.

The proposed infrastructure has been sensitively positioned to minimise infringement on the public realm and to minimise impact to the visual amenity of passersby. The proposed infrastructure is

situated away from the riverside path and is also situated away from the Elizabeth Gardens public realm space and access. Due to the location of the proposed infrastructure any impact on the visual amenity of the river would also be negligible and would not affect views of the riverside in anyway.

Size and Design

The two feeder pillars proposed are identical, both measuring approximately 2.0 metres in height, 2.850 metres in width and 0.6 metres in depth. The massing and dimensions of the pillars are informed by the design standards under the DNO's statutory powers. They are no larger than needs to be and seeks to meet the minimum requirements stipulated by UKPN.

Therefore, the design of the pillars seeks to balance the need to satisfy statutory power requirements, alongside the need to ensure that the requirements set out in Policy CS19 above are satisfied.

The proposed feeder pillars cabinets and associated equipment are considered to be an essential piece of equipment which, in the future, will assist in the transition from diesel combustion to zero emissions at source.

The cabinet and kiosk will be coloured gray to not stand out and fit in with its surroundings, in order to be sympathetic to the wider area.

Heritage

As noted above the proposed site for the feeder pillars are located just outside of the High Street & Queen Street Conservation Area but within the buffer zone. The area is located directly adjacent to Elizabeth Gardens, highlighted as an important area of open space for the Conservation Area, which is situated behind a number of buildings on West Street, which are a mixture of historic buildings with sympathetic infill that hide large apartment blocks of Melbourne Quay, a late 1980s development. The Grade II Listed New Falcon Inn (List ID 1025874) is also located to the south of the proposed development on West Street itself, on the edge of the Conservation Area boundary. Given the small-scale nature of the proposed works, on a disused area of land it is considered that the proposed development is minor in scale and would have no adverse effect on setting of the High Street & Queen Street Conservation Area and will not affect views of the riverside from the Thames Path or the Elizabeth Gardens public realm area.

It is therefore considered that the proposals are in line with Local Plan policy CS20 Heritage and the Historic Environment, which states in paragraph 5.16.11 that proposals and initiatives will be supported which preserve and, where appropriate, enhance the significance of the Borough's heritage assets, especially where these contribute to the distinct identity of the Borough, including as part of the development of Gravesend Town Centre and its development as a heritage riverside town, and its setting, by laying the foundations for future riverside activity in a sustainable way within Gravesend.

Biodiversity

With regard to Biodiversity Net Gain (BNG) Due to the scale of the proposed development the proposal does not impact an onsite priority habitat and impacts less than 25 square metres of onsite habitat that has biodiversity value greater than zero; and less than 5 metres in length of onsite linear habitat. Therefore, it is considered that the development is subject to the de minimis exemption as set out in the Biodiversity Gain Requirements (Exemptions) Regulations 2024. In addition, as part of the proposals, the PLA will maintain the small area around the pillars to ensure safe access for maintenance and to allow UK Power Networks to access the infrastructure.

Design and Visual Impact conclusion

Overall the proposals are considered to be appropriately located, and of a suitable size and design. As a result of this, the proposals are considered to preserve the quality of the public realm, and the visual amenity of the riverside walkway. Therefore, it is considered that the proposals are in compliance with the requirements of Policy CS19 of the Gravesham Local Plan.

Flooding

Policy CS18 'Climate Change' of the Local Plan requires proposals in areas at risk of flooding to be accompanied by a Flood Risk Assessment (FRA). An FRA Report has been prepared and is submitted alongside this application. The assessment concludes the proposals are water compatible and will not result in an increase of flood risk on or off site, and in addition, that the proposed development is consistent with the NPPF, its planning practice guidance and the Council's Core Strategy policies.

The site is located within a Flood Risk Zone 3 area (Flood Risk Zone 3 Plan submitted separately). The proposed infrastructure is minor in size and involves works associated with an existing acceptable use which is considered 'water compatible' and located in a flood risk area. It is considered that the proposed development will not increase the risk of flooding at the site or surrounding area. See associated Flood Risk Assessment for further information.

Construction Method Statement

As part of the construction / installation of the proposed feeder pillars, it is proposed that the following condition should be added as part of any forthcoming planning permission: *"Prior to the commencement of works on Site a Method Statement should be submitted and approved by the Council in writing."*

In addition to confirm that no levelling works are required as part of the proposal, the pillars will sit on a small concrete base to disrupt the remainder of the area as little as possible. In terms of any future connection to the pontoons as part of a reinstated West Street Pier, to confirm the details of the proposed pontoons are still to be finalised, so cannot yet confirm the final routes for any future cabling to the pontoons at this stage, this will be addressed through a future consenting process such as a detailed Flood Risk Activity Permit with the Environment Agency as appropriate. This planning application is for the installation of the feeder pillars only.

Energy and Sustainable Transport

Policy CS11 'Transport' of the GBC Local Plan is supportive of proposals which improve the efficiency of freight transport and states the Council will support proposals which improve the efficiency of freight transport and provide opportunities for alternatives to road transport where possible.

Policy CS18 'Climate Change' of the GBC Local Plan seeks to reduce the overall carbon footprint of the borough. The Water Framework Directive and Thames River Management Plan seek to improve the quality of local water environments for people and wildlife, and to promote the sustainable use of water.

Underpinning all tiers of policy is the Climate Change Act 2008. This piece of legislation established a legally binding target to reduce the UK's greenhouse gas emissions by at least 80% in 2050, from 1990 levels.

The installation of the proposed technology is critical to facilitating a reduction in carbon emissions from marine operators on the Thames. The availability of this power will assist in displacing diesel for vessels whilst at berth.

By providing adequate electrical power services, marine operators using West Street pier in the future will be able to move away from burning diesel in generators (either on board or temporary pier-side generators) to zero emissions at source electrical power and reduce road transport emissions by discontinuing the use of the diesel generator and associated diesel fuel deliveries.

Employment and the Economy

Policy CS07 'Economy. 'Employment and Skills' of the Local Plan state the Council will support proposals which facilitate the expansion of river-related employment, particularly where this involves the use of the river for transport and as a functional commercial waterway.

Policy CS11 'Transport' of the GBC Local Plan is supportive of proposals which improve the efficiency of freight transport. In addition, this policy states the Council will safeguard wharves within the district.

The River Thames is a working river which plays a key role in the economy. Given its strategic economic role, it is essential that the necessary green infrastructure is in place to enable continued economic growth, especially in the context of there being growing pressure on businesses to reduce the carbon footprint and to rely on greener means of transporting goods.

Whilst the provision of this shore power project in association with West Street Pier is a minor proposal in itself, it is representative of the policy objectives at a national and regional level and will provide an array of economic benefits. Most notably, this infrastructure will be key in supporting and facilitating the reinstatement of viable and sustainable operations at West Street pier in the future, with the pier former an important piece of river infrastructure.

The electrical infrastructure will enable the pier to encourage a shift away from using non-renewable sources of fuel such as diesel, which is being encouraged at all administrative levels. It is greatly important to ensure that the necessary electrical infrastructure is available along the Thames, to avoid stifling the operations and viability of business that rely on river transport.

Conclusions

The proposed development seeks to provide small-scale infrastructure which is required to facilitate a shore power installation project at the Site as part of the future provision of a new pier at the site of the former West Street Pier.

The need for this proposal is underpinned by the necessity to move towards sustainable forms energy generation and low or zero emissions operations. This electric infrastructure will allow marine operators using West Street pier in the future can move away from burning diesel in generators (either onboard or temporary pier-side generators) to zero emissions at source.

The design and dimensions of the infrastructure are informed by the design standards under the DNO's statutory powers. The infrastructure seeks to meet the minimum requirements stipulated by the distribution network operator (DNO), UK Power Networks. The infrastructure is water resistant and will not result in an increase in risk of flooding on or off site.

The proposed infrastructure has also been sensitively positioned to minimise any negative infringement on the public realm, in order to minimise visual disturbance and maintain the useability of the surrounding public realm.

Overall, it is considered that planning permission should be granted as the sustainability and economic oriented benefits of the scheme demonstrably outweigh any minimal perceived harm. A key factor to be considered within the planning balance is that the proposals are consistent with the sustainability-oriented golden thread running through key legislation, as well as national, regional and local planning policy. The sustainability-related benefits should be afforded significant weight, given that a fundamental role of the planning system is to facilitate and promote sustainable development.