

Ref: **PP-13791099**

February 2025

Planning Department
Gravesham Borough Council
Civic Centre
Gravesend
DA12 1AU

Dear Sir/Madam

100-102, London Road, Northfleet, Gravesend, DA11 9LY**Full Planning Application (Planning Portal Reference PP-13791099)**

We write on behalf of our client, Aldi Stores Limited ('the applicant') in support of an application at 100-102, London Road, Northfleet, Gravesend, DA11 9LY ('the Site'). The Site is located within the administrative boundary of Gravesham Borough Council, who act as the Local Planning Authority (LPA). The application has been submitted online via the Planning Portal (ref. PP-13791099).

Full planning permission is sought for the following:

"Replacement and installation of plant within the existing plant compound and within new plant compound."

Application Package

This Covering Letter acts both as the Planning Statement and the Design and Access Statement. The application is also accompanied by the following documents:

- Planning Application Form and Fee;
- Ownership Certificates;
- Community Infrastructure Levy Form;
- Planning Drawings;
 - Site Location Plan (ref. 21014-SHE-36-03);
 - Existing Floor Plans and Elevations (ref. 21014-SHE-36-04 and 21014-SHE-36-05);
 - Proposed Floor Plans and Elevations (ref. 21014-SHE-36-06, 21014-SHE-36-07, and 21014-SHE-36-08); and
 - Landscape Plan (ref. 21014-SHE-36-09).
- Noise Assessment, Prepared by Sharps Redmore, dated February 2025.
- Small Site BNG Metric, Prepared by Enzygo, dated February 2025.

The Site

The Site is located directly adjacent to the intersection of London Road (B2175) and the Thames Way (A226). Pedestrian and vehicular access into the Site is located to the north along London Road. A Site Location Plan has been submitted alongside this application. This sets out that the works will principally be located to the south of the existing store, shielded from view by the store itself, and by a thick established tree/hedgerow along the east/southern boundary of the site. The existing store comprises a convenience retail store of Class E use.

The Site is bound to the east and south by Thames Way (A226), with low density housing located beyond this. To the southwest of the Site, the store carpark directly abuts several semi-detached residential properties. To the northwest, there is an electrical substation and ancillary buildings, which similarly front onto London Road to the north. London Road comprises a mix of uses, with residential and commercial entrances typically located at ground floor and residential units above. It links the centre of Gravesend to the east, to Northfleet just west of the Site.

The Site is located in Flood Zone 1 and has a low probability of surface water flooding. The Site is not located within a Conservation Area, but Overcliffe Conservation Area does lie on the opposite side of London Road to the north of the Site. The nearest listed building is the Grade II listed 'Cliff Top Entrance, Comprising Platform, Terrace Walls, Tunnel And Stairs To The Former Rosherville Gardens', approximately 300m northwest of the Site.

Planning History

Having undertaken a desk-based review of the LPA's online planning register, we note that the following planning applications on site are considered to be of relevance:

Date and Decision	Reference	Description
12/08/2004 Granted	20020018	Erection of a single storey building to provide a food retail unit; construction of a new vehicular access onto a classified road and laying out of 84 no. car parking spaces; erection of 2.1m high brick wall to boundary rear of 1-15 St Marks Avenue and erection of 1.5m high post and rail fence to the Thames Way boundary.
18/01/2005 Granted	20041056	Application for variation of condition 3 of planning permission reference number GR/2002/0018 which restricts opening hours, to allow the store to trade on Sundays and Bank Holidays between 1000 hours and 1600 hours.
01/08/2006 Granted	20060457	Erection of single storey extension on southern side elevation to provide additional retail and storage area with a reduction in car parking spaces from 84 to 74.
18/09/2009 Granted	20090590	Erection of single storey extension on southern elevation to provide enlarged retail and storage area involving relocation of the loading bay and re-arrangement of the car park.
14/01/2013 Granted	20120967	Erection of two bay extension on southern elevation to increase retail and storage area involving relocation of loading bay and re-arrangement of car park.
20/01/2025 Withdrawn	20241068	Replacement and installation of plant within the existing plant compound and within new plant compound.

Development Proposals

Detailed drawings of the proposals have been prepared by The Harris Partnership and accompany this application. The development proposals principally comprise:

- Replacement of plant within the existing plant compound; and
- An additional plant compound measuring, to accommodate new plant which will facilitate ongoing energy requirements of the store, including the installation of Air Source Heat Pumps to increase efficiency.

Planning Policy Framework

Section 38(6) of the Planning and Compulsory Purchase Act (2004) makes it clear that 'if regard is to be had to the development plan for the purposes of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material consideration indicate otherwise'.

For this Site the Development Plan comprises the following:

- Gravesham Local Plan Core Strategy and Local Plan Policies Map (2014);
- Gravesham Local Plan First Review (1994) – saved Policies; and
- Kent County Council Minerals and Waste Local Plan 2013-30 (2020)

The Site is not subject to any planning policy designations in the adopted Local Plan as set out in the Local Plan Policies Map. However Overcliffe Conservation Area lies just north of the Site, across the London Road.

Planning Assessment

The proposed development has been prepared in the context of relevant policy and guidance at the national, regional and local level. This section of the Covering Letter provides an assessment of the proposed development against these policies. The key considerations when assessing the proposed works are follows: the Principle of Plant and Sustainability, Noise and Design & Heritage.

Principle of Plant and Sustainability

Gravesham Local Plan Core Strategy (2014) Policy CS01 (Sustainable Development) sets out that the Council will work proactively with applicants to secure development that improves the environmental conditions in the area. Additionally, Policy CS18 (Climate Change) outlines that the Council will seek to reduce the overall carbon footprint of the Borough, in particular the Council will support stand-alone decentralised, renewable or low carbon development and proposals which lead to a reduction in carbon footprint.

The works principally involve the replacement and upgrade of existing plant to the side of the store, with an additional plant compound to the rear of the store. Given the location of the proposed works, they will not be visible from the public realm, nor will they be publicly accessible. The proposals seek to provide Air Source Heat Pumps and upgraded plant equipment to enable more efficient energy usage on site. The proposals seek to futureproof the foodstore,

whilst contributing to wider sustainability goals as set out within the adopted Local Plan. It is therefore understood that the development accords with development plan policy.

Noise

The Core Strategy (2014) Policy CS19 (Development and Design Principles) sets out that new development will be located, designed and constructed to avoid adverse environmental impacts for pollution, including noise.

Given the proposals are located to the rear and side of the existing retail store and they are of considerable distance from any sensitive land use (approx. 60m), it is understood that any noise emitted from the development would have a negligible impact. A Noise Assessment has been prepared by Sharps Redmore and submitted alongside the application. In summary, the assessment objectively demonstrates that noise arising from the fixed plant complies with the requirement of Para 191 of the NPPF, by avoiding any significant adverse impact.

Ecology and Biodiversity

Core Strategy Policy CS12 (Green Infrastructure) sets out that there will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought, in particular within the Biodiversity Opportunity Areas shown on the Strategic Green Infrastructure Network map and within new development.

Based on the latest soft landscaping proposals, the proposed development will result in a total Biodiversity Net Gain of +47.4%, therefore exceeding the 10% mandatory requirement as set out under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). The ecology on site will be improved through the introduction of 2 no. native trees, planted oversailing vegetation as set out in the Landscape Plan, prepared by THP and submitted alongside this application. It is therefore understood that the proposal comply with Planning Policy from a BNG perspective.

Design & Heritage

Core Strategy (2014) Policy CS20 (Heritage and the Historic Environment) states that the Council will accord a high priority towards the preservation, protection and enhancement of its heritage and historic environment. The Policy goes on to state that proposals will be supported which preserve the significance of the Borough's heritage assets and their setting.

Furthermore, Policy CS19 (Development and Design Principles) also states that new development will conserve and enhance the character of the local built, historical and natural environment. Going on to suggest that the design and construction of new development will be supported should it incorporate sustainable construction standards and techniques.

Designed to a high quality to ensure longevity, the proposals comprise the installation of new plant both within the existing plant compound area and in an additional compound area to the rear of the retail unit. This will be largely hidden from view by the store itself and the established shrub/tree boundary to the southeast of the Site. Given this, there is a distinct lack of character within the vicinity, and so it is reasonable to assume that the proposals will have a negligible

impact on the special interest, character, and appearance of the nearby Conservation Area or its setting. It is therefore considered that the development accords with development plan policy.

Summary

In summary, the proposals principally comprise works to increase the energy efficiency of the existing store, contributing to wider sustainability goals in Gravesham.

As outlined within this letter, we consider that the proposal accords with the adopted Development Plan. We would therefore be grateful if Gravesham Borough Council could confirm that our application is complete and will be validated shortly.

If you have any queries or require further information, please don't hesitate to contact Adam Dixon +44 7778 098 651 or Penny Moss +44 07968 257926 at this office.

Yours faithfully,

A handwritten signature in cursive script that reads "Alison Young".

For and on behalf of Avison Young (UK) Limited