

Delegated Report

Full Planning Application

Planning Application No:	20250701
Location:	Algeco UK Limited Wharf Road Gravesend Kent
Description:	Installation of a new jet wash zone, new pedestrian route and increasing the total parking provision on site from 18 to 23 spaces.
Applicant:	Algeco UK Limited
Site Visit Date:	30 July 2025

Submitted Documents/Plans

Application form
Cover letter dated 8 July 2025
Floor Risk Assessment Rev. P3 (01/07/2025)
ARMCO Specification
Drawing no. 001 Rev. P02 (Site Location Plan)
Drawing no. 002 Rev. P04 (Site Block Plan as Existing)
Drawing no. 003 Rev. P05 (Site Block Plan as Proposed)

Supplementary Information:

Geoeptor Bypass Separator Brochure
Geoeptor Range Drawing
Drawing no. 1387_T Rev. 0 (Topographical Survey)
Response from agent (dated 03.10.2026)
Response from agent (dated 11.05.2026)

Relevant Planning History

There is no planning history.

Development Plan

Gravesham Local Plan Core Strategy (2014)

- 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 – Design and Development Principle

Gravesham Local Plan: First Review (1994)

- TC7 – Other Archaeological Sites

- T1 – Impact of Development on Highway Network
- P3 – Vehicle Parking Standards

Paragraph 34 of the NPPF (2024) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- Section 2 – Achieving sustainable development
- Section 4 – Decision-making
- Section 6 – Building a strong, competitive economy
- Section 9 – Promoting sustainable transport
- Section 12 – Achieving well-designed places
- Section 14 – Meeting the challenge of climate change, flooding and coastal change
- Section 15 – Conserving and enhancing the natural environment

Supplementary Planning Guidance

- SPG 4 – KCC Parking Standards (2006)
- Design for Gravesham – Design Code (2024)

Emerging Local Plan as a Material Consideration

Paragraph 48 of the Framework makes it clear that planning applications can only be determined in accordance with the development plan, unless material considerations indicate otherwise. An emerging Local Plan does not form part of the Development. The Framework, at Paragraph 49 allows local planning authorities to give weight to relevant policies in emerging Local Plans, according to:

- The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- The degree of consistency of the relevant policies in the emerging plan to the Framework, the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given to those policies.

West Oxfordshire District Council v Secretary of State for Housing, Communities and Local Government & Rosconn Strategic Land Ltd [2018] EWHC 3065 (Admin) is a High Court judgement that deals with the weight to be given to a Regulation 19 Local Plan. In this judgement the Court found that the weight to be given to an emerging Local Plan, was a matter of planning judgement, which had to be reached having fully considered the relevant part (Paragraph 49) of the Framework.

The Council's emerging Local Plan, is in the process of being consulted upon (it has reached Regulation 19 stage), the Council is not yet aware of whether third parties will support or object to specific policies within the Plan, or whether they will consider the policies with the emerging Local Plan to be broadly sound and consistent with the NPPF (2024). Taking this into consideration, one can only conclude that at this

stage of the process, **limited (i.e. minimal) weight should be afforded to the emerging Regulation 19 Local Plan**. This position would only change once the emerging Local Plan has progressed towards submission and examination, with the Council being fully aware of policies that are subject to unresolved objections and with knowledge of policies that have had their soundness and conformity against the Framework challenged.

This approach accords with the approach taken in a separate High Court case, *Gladman Developments Ltd v SSHCLG & Corby Borough Council*; & *Uttlesford DC* [2020] EWHC 518 (Admin) and Court of Appeal [2021] EWCA Civ 104, which was also the subject of a Court of Appeal Ruling [2021] EWCA Civ 104.

Consultations, Publicity and Representations

External Consultees

Environment Agency 11 August 2025

We **object** to the application as submitted because the applicant has not supplied adequate information to demonstrate that the risks of pollution posed to surface water quality can be safely managed. We recommend that unless and until the applicant provides adequate information to demonstrate that the risks of pollution posed can be safely managed then planning permission should be refused.

Please refer to the following sections for our full response:

- Section 1: Reasons for, and how to overcome our objection(s)
- Section 2: Advice to the Applicant / Local Planning Authority

Please note that our comments are based on the details available to us at the time of writing. If any subsequent changes are made to the application, please reconsult us.

Please be aware that we wish to be re-consulted on this planning application once the required information has been submitted. Please also note that our subsequent advice may concern other important environmental issues.

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations.

Section 1: Reasons for, and how to overcome, our objection(s)

Objection - Insufficient information to determine risks to water quality

Reasons

Paragraph 187 of the NPPF states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of water pollution.

The proposal includes the installation of a new jet wash zone. It is important to highlight that vehicle washing activities generate trade effluent, which typically contains oils, detergents, and suspended solids. If discharged without appropriate treatment, this effluent can pose a significant risk to the environment.

We consider that the proposed development may pose an unacceptable risk of causing a detrimental impact to surface water quality as we note the following points of concern:

- The application states that surface water will continue to discharge to a nearby brook via existing private sewers. If the jet wash effluent is directed to this surface water system, this would constitute an unauthorised discharge of trade effluent, which is not permitted under environmental regulations.

- The application also indicates that no trade effluent will be produced, which appears to be incorrect. Jet wash water is classified as trade effluent and must be managed accordingly.

To comply with environmental legislation, the applicant must ensure that:

- Jet wash effluent is discharged to the foul sewer, subject to approval from the relevant water company; or
- A discharge permit is obtained from the Environment Agency if the effluent is to be discharged to a watercourse.

Overcoming our objection

The applicant should provide clarification on how effluent from the proposed jet wash zone will be managed, including confirmation of the discharge route and any necessary consents or permits.

Section 2: Advice to the Applicant / Local Planning Authority

Advice to LPA

Flood risk standing advice

The proposed development falls within Flood Zone 3, which is land defined in the planning practice guidance as being at risk of flooding.

We have produced a series of standard comments for local planning authorities and planning applicants to refer to on 'lower risk' development proposals. These comments replace direct case-by-case consultation with us. This proposal falls within this category.

These standard comments are known as Flood Risk Standing Advice (FRSA). They can be viewed at <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications#when-to-follow-standing-advice>

We recommend that you view our standing advice in full before making a decision on this application.

Flood resistance and resilience

We strongly recommend the use of flood resistance and resilience measures. Physical barriers, raised electrical fittings and special construction materials are just some of the ways you can help reduce flood damage.

To find out which measures will be effective for this development, please contact your building control department. If you'd like to find out more about reducing flood damage, visit the Flood Risk and Coastal Change pages of the planning practice guidance. Further guidance on flood resistance and resilience measures can also be found in:

Government guidance on flood resilient construction

<https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings>

CIRIA Code of Practice for property flood resilience

https://www.ciria.org/Research/Projects_underway2/Code_of_Practice_and_guidance_for_property_flood_resilience_.aspx

British Standard 85500 – Flood resistant and resilient construction

<https://shop.bsigroup.com/ProductDetail/?pid=000000000030299686>

Flood risk issues not within our direct remit.

The following issues are not within our direct remit or expertise, but nevertheless may be important considerations for managing flood risk for this development. Prior to deciding this application, we

recommend that consideration is given to the issues below. Where necessary, the advice of relevant experts should be sought.

- Adequacy of rescue or evacuation arrangements
- Details and adequacy of an emergency plan
- Provision of and adequacy of a temporary refuge
- Details and adequacy of flood proofing and other building level resistance and resilience measures
- Details and calculations relating to the structural stability of buildings during a flood
- Whether insurance can be gained or not
- Provision of an adequate means of surface water disposal such that flood risk on and off-site isn't increased

Advice to applicant

Connection to mains foul drainage

Government guidance contained within the national Planning Practice Guidance (Water supply, wastewater and water quality – considerations for planning applications, paragraph 020) sets out a hierarchy of drainage options that must be considered and discounted in the following order:

- Connection to the public sewer
- Package sewage treatment plant (adopted in due course by the sewerage company or owned and operated under a new appointment or variation)
- Septic Tank

Foul drainage should be connected to the main sewer. Where this is not possible, under the Environmental Permitting Regulations 2016 any discharge of sewage or trade effluent made to either surface water or groundwater will need to be registered as an exempt discharge activity or hold a permit issued by the Environment Agency, additional to planning permission. This applies to any discharge to inland freshwaters, coastal waters or relevant territorial waters.

Please note that the granting of planning permission does not guarantee the granting of an Environmental Permit. Upon receipt of a correctly filled in application form we will carry out an assessment. It can take up to 4 months before we are in a position to decide whether to grant a permit or not.

Domestic effluent discharged from a treatment plant/septic tank at 2 cubic metres or less to ground or 5 cubic metres or less to surface water in any 24-hour period must comply with General Binding Rules provided that no public foul sewer is available to serve the development and that the site is not within an inner Groundwater Source Protection Zone.

A soakaway used to serve a non-mains drainage system must be sited no less than 10 metres from the nearest watercourse, not less than 10 metres from any other foul soakaway and not less than 50 metres from the nearest potable water supply.

Where the proposed development involves the connection of foul drainage to an existing non-mains drainage system, the applicant should ensure that it is in a good state of repair, regularly de-sludged and of sufficient capacity to deal with any potential increase in flow and loading which may occur as a result of the development.

Where the existing non-mains drainage system is covered by a permit to discharge then an application to vary the permit will need to be made to reflect the increase in volume being discharged. It can take up to 13 weeks before we decide whether to vary a permit.

Further advice is available at: [Septic tanks and treatment plants: permits and general binding rules.](#)

Planning advice service

Should you wish us to review any technical documents or want further advice to address the environmental issues raised, we may do this as part of our charged for planning advice service.

Further engagement will provide you with the opportunity to discuss and gain our views on potential options to overcome our objection with us, before formally submitting further information as part of your planning application. It should also result in a better quality and more environmentally sensitive development.

As part of our charged for service we will provide a dedicated project manager to act as a single point of contact to help resolve any problems. We currently charge £115 per hour, plus VAT. We will provide you with an estimated cost for any further discussions or review of documents. The standard terms of our charged for service are available [here](#).

If you would like more information on our planning advice service, including a cost estimate, please contact us at kslplanning@environment-agency.gov.uk

Environment Agency 30.10.2026

We **maintain our objection** to the application as submitted because the applicant has not supplied adequate information to demonstrate that the risks of pollution posed to surface water quality can be safely managed. We recommend that unless and until the applicant provides adequate information to demonstrate that the risks of pollution posed can be safely managed then planning permission should be refused.

Please refer to the following sections for our full response:

- Section 1: Reasons for, and how to overcome, our objection(s)
- Section 2: Advice to the Applicant / Local Planning Authority

Note to applicant

Planning advice service

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If you would like more information on our planning advice service, including a cost estimate, please contact us at kslplanning@environment-agency.gov.uk

Note to LPA

Please be aware that we wish to be re-consulted on this planning application once the required information has been submitted. Please also note that our subsequent advice may concern other important environmental issues.

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations.

Section 1: Reasons for, and how to overcome, our objection(s)

Reasons

Building upon our previous comments dated 11 August 2025 (KT/2025/132733/01-L01) and in line with paragraph 187 of the National Planning Policy Framework.

Having reviewed the above additional information, we support the use of an oil/petrol separator in those areas deemed appropriate i.e. the car parking area. However, as highlighted in our previous response the jet wash water is classified as trade effluent and must be managed accordingly. The use of an oil/petrol separator to dispose of trade effluent produced from the jet wash area is not appropriate.

Following the Pollution prevention for businesses - GOV.UK guidance it states that:

Activities that produce contaminated water

If your business produces contaminated water or other polluting liquids ('trade effluent') you must make sure it does not cause pollution.

Such activities may include:

- *vehicle washing, wheelie bin washing or yard cleaning*
- *manufacturing processes*
- *water cooling*
- *cleaning of food production areas or ovens*

Assess if it's possible to redesign your process to avoid or minimise creating contaminated water, for instance by using dry systems. If unavoidable, you should reuse or dispose of contaminated water by:

- *collecting it in a sealed system for reuse, treatment on site or removal by a registered waste carrier*
- *putting it down the foul water (or combined) drain if you've got permission from your water company - contact them to get consent*

Overcoming our objection

The applicant should update how the trade effluent from the jet wash area will be disposed of, in accordance with the above guidance.

Section 2: Advice to the Applicant / Local Planning Authority

Flood risk standing advice

The proposed development falls within Flood Zone 3, which is land defined in the planning practice guidance as being at risk of flooding.

We have produced a series of standard comments for local planning authorities and planning applicants to refer to on 'lower risk' development proposals. These comments replace direct case-by-case consultation with us. This proposal falls within this category.

These standard comments are known as Flood Risk Standing Advice (FRSA). They can be viewed at <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications#when-to-follow-standing-advice>

We recommend that you view our standing advice in full before making a decision on this application.

Flood resistance and resilience

We strongly recommend the use of flood resistance and resilience measures. Physical barriers, raised electrical fittings and special construction materials are just some of the ways you can help reduce flood damage.

To find out which measures will be effective for this development, please contact your building control department. If you'd like to find out more about reducing flood damage, visit the Flood Risk and Coastal Change pages of the planning practice guidance. Further guidance on flood resistance and resilience measures can also be found in:

Government guidance on flood resilient construction <https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings>

CIRIA Code of Practice for property flood resilience
https://www.ciria.org/Research/Projects_underway2/Code_of_Practice_and_guidance_for_property_flood_resilience.aspx

British Standard 85500 – Flood resistant and resilient construction
<https://shop.bsigroup.com/ProductDetail/?pid=000000000030299686>

Flood risk issues not within our direct remit

The following issues are not within our direct remit or expertise, but nevertheless may be important considerations for managing flood risk for this development. Prior to deciding this application, we recommend that consideration is given to the issues below. Where necessary, the advice of relevant experts should be sought.

- Adequacy of rescue or evacuation arrangements • Details and adequacy of an emergency plan
- Provision of and adequacy of a temporary refuge
- Details and adequacy of flood proofing and other building level resistance and resilience measures
- Details and calculations relating to the structural stability of buildings during a flood
- Whether insurance can be gained or not
- Provision of an adequate means of surface water disposal such that flood risk on and off-site isn't increased

Connection to mains foul drainage

Government guidance contained within the national Planning Practice Guidance (Water supply, wastewater and water quality – considerations for planning applications, paragraph 020) sets out a hierarchy of drainage options that must be considered and discounted in the following order:

- Connection to the public sewer
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Foul drainage should be connected to the main sewer. Where this is not possible, under the Environmental Permitting Regulations 2016 any discharge of sewage or trade effluent made to either surface water or groundwater will need to be registered as an exempt discharge activity or hold a permit issued by the Environment Agency, additional to planning permission. This applies to any discharge to inland freshwaters, coastal waters or relevant territorial waters.

Please note that the granting of planning permission does not guarantee the granting of an Environmental Permit. Upon receipt of a correctly filled in application form we will carry out an assessment. It can take up to 4 months before we are in a position to decide whether to grant a permit or not.

Domestic effluent discharged from a treatment plant/septic tank at 2 cubic metres or less to ground or 5 cubic metres or less to surface water in any 24-hour period must comply with General Binding Rules provided that no public foul sewer is available to serve the development and that the site is not within an inner Groundwater Source Protection Zone.

A soakaway used to serve a non-mains drainage system must be sited no less than 10 metres from the nearest watercourse, not less than 10 metres from any other foul soakaway and not less than 50 metres from the nearest potable water supply.

Where the proposed development involves the connection of foul drainage to an existing non-mains drainage system, the applicant should ensure that it is in a good state of repair, regularly de-sludged and of sufficient capacity to deal with any potential increase in flow and loading which may occur as a result of the development.

Where the existing non-mains drainage system is covered by a permit to discharge then an application to vary the permit will need to be made to reflect the increase in volume being discharged. It can take up to 13 weeks before we decide whether to vary a permit.

Further advice is available at: [Septic tanks and treatment plants: permits and general binding rules.](#)

Environment Agency 04.06.2026

We have **no objection** to the proposed development.

The latest response from the agent confirms that runoff from the jet washing will be discharged to the foul sewer and that an application is currently being made to the sewer undertaker to obtain the necessary consent.

On this basis, we have no further objection to the project proceeding. However, we would request that the applicant submits a copy of the consent certificate from the sewer undertaker once it has been obtained.

Please note that our comments are based on the details available to us at the time of writing. If any subsequent changes are made to the application, please reconsult us.

Decision notice

In accordance with the planning practice guidance ([determining a planning application, paragraph 019](#)), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

KCC Heritage

The site lies within an area of multi-period archaeological potential. However, based on existing Historic Environment Record data for the area and the past development of the site, I consider it unlikely that these proposals would have a significant below-ground archaeological impact and have no further comments to make in this case.

Lower Medway Internal Drainage Board

The submission has been reviewed, and the Board has no comment as the proposals do not significantly impact our interests.

Internal Consultees

GBC Environmental Protection

There is no objection to this application. The area is industrial so there is unlikely to be any detrimental impact. An interceptor is to be fitted to the wash areas so this will ensure that pollutants (fuels/oils etc in particular) do not enter the drainage system.

Neighbouring properties

The application has been advertised by individual neighbour letters to 19 properties and on site. The overall consultation period expired on 4 June 2026.

No letters of representation have been received from neighbouring properties.

Local Ward Councillors were also consulted but no responses were received.

Officer's Analysis

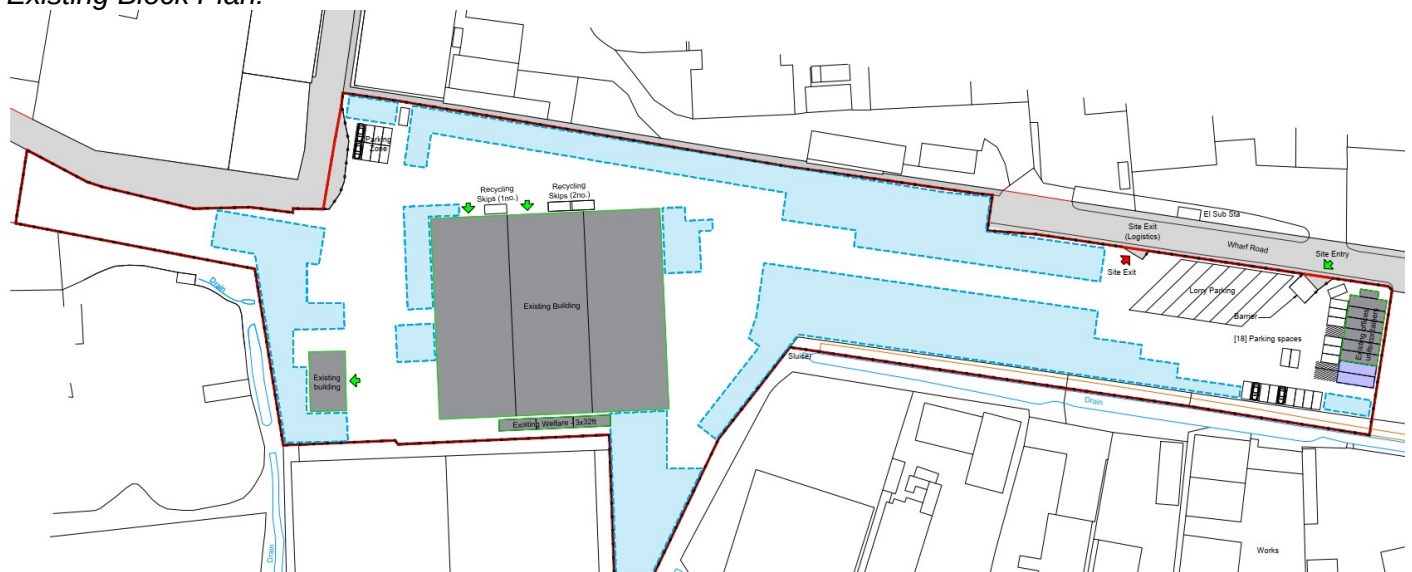
Proposal

This application seeks permission for the installation of a new jet wash zone, new pedestrian route and increasing the total parking provision on site from 18 to 23 spaces.

The proposal includes 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 for completeness. Similarly, it is also intended 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.

Existing Block Plan:





2014 reflects these aims and requires that new development is well designed and respects the character and appearance of the surrounding area.

The property lies within the urban boundary and comprises an industrial use in an industrial area.

Current Google Earth Aerial Image:



In terms of the proposals, the works relate to the main use of the site and would not be out of keeping with the character and appearance of the area. Indeed, the works will formalise and organise the site and would help improve its appearance.

The proposal is therefore considered to comply with the design requirements of Section 12 of the NPPF 2024 and Policy CS19 of the Core Strategy 2014.

Residential Amenity

The NPPF 2024 states that planning decisions should aim to secure a high standard of amenity for all existing and future users (paragraph 135f). The impact on amenity is also considered with regard to the criteria within Policy CS19 of the Core Strategy 2014, which states that new development should be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants, and those of neighbouring properties and land, and avoid adverse environmental impacts from pollution.

In terms of light, privacy and visual intrusion impacts from the proposal, as there are no residential properties within close proximity of the site, there are no amenity matters of concern. The proposal would also not result in any adverse environmental impacts on neighbouring properties.

The proposal would therefore adequately safeguard residential amenity and avoid adverse environmental impacts, in compliance with paragraph 135 of the NPPF 2024 and Policy CS19 of the Core Strategy 2024.

Parking and Highways

With regards to highways issues, the proposal to formalise the parking area on the site will increase the amount of parking by 5 spaces and form a safer route for pedestrians around the site. There are no alterations proposed to the existing site entry and exit accesses. The proposal will therefore not cause any local highway concerns.

It must be noted that no objections have been received relating to parking or access issues on or around the site.

On the basis of the above comments, there would be no adverse parking or highway issues resulting from the proposal, which complies with Saved Policies T1 and P3 of the Local Plan First Review (1994) and Policies CS11 and CS19 of the Core Strategy 2014.

Any Other Material Planning Considerations

Archaeology

The site lies within an area of multi-period archaeological potential. However, based on the existing Historic Environment Record data for the area and the past development of the site, it is unlikely that the proposal would have a significant below-ground archaeological impact. The proposal therefore complies with Policy CS20 of the Core Strategy 2014 and paragraph 210 of the NPPF 2024.

Flooding and Drainage

The application site is within Flood Zone 3. A Flood Risk Assessment has therefore been submitted with the application. The Environment Agency did not have any specific comments to make on the submission as it falls within the 'lower risk' category for flooding but referred to their Flood Risk Standing Advice.

The Environment Agency initially objected to the proposal in relation to the jet wash zone, as inadequate information had been supplied to demonstrate that the risks of pollution posed to surface water quality could be safely managed. However, further information was submitted and the Environment Agency concluded that the latest response from the agent confirms that runoff from the jet washing will be discharged to the foul sewer and that an application is currently being made to the sewer undertaker to obtain the necessary consent. They wish to see a copy of the consent certificate once obtained, and therefore a condition is required on this basis.

The proposal complies with the requirements of Policy CS18 of the Local Plan 2014 and paragraphs 170, 181 and 187 of the NPPF 2024.

Conclusion

Matters pertaining to the principle of the proposal, the character and appearance of the development, and residential amenity, parking and highways, archaeology and flooding and drainage issues have been addressed satisfactorily, and the proposal is considered to comply with the requirements of Policies CS04, CS07, CS11, CS18 and CS19 of the Core Strategy 2014, saved Policies TC7, T1 and P3 of the Local Plan 1994, and paragraphs 115, 131, 135, 170, 181 and 187 of the NPPF 2024.

The application should therefore be permitted.

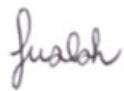
Recommendation

Permission subject to conditions.

(For conditions and informatives, see draft decision.)

Case Officer:	Mrs Katherine Parkin	Team Leader:	Mrs Faye Walsh
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Signed:	K. Parkin	Signed:	
Dated:	18 June 2026	Dated:	25 June 2026