

Ethan Bonthron
Gravesham Borough Council
Planning Department,
Civic Centre,
Gravesend,
DA12 1AU

23 July 2025

For the attention of Ethan Bonthron

Dear Ethan,

Section 73 of the Town and Country Planning Act 1990 (As Amended)
Former SGN Gasholders Site, Land on the east side of Canal Road, Gravesend, Kent, DA12 2RS
Planning application under S73 of the TCPA 1990 (As Amended) to vary Condition 2 attached to the decision notice for application ref. 20240960

Planning Portal Reference: PP-14200537

On behalf of our client, JH (Milton) Ltd and SGN Property Holdings Ltd (a subsidiary of Joseph Homes) ('the Applicant'), we write in support of an application under Section 73 of the Town and Country Planning Act 1990 (As Amended) to vary Condition 2 attached to the decision notice for application ref. 20240960.

In order to support your consideration of the proposals, please find enclosed the following:

- / Applications Forms – prepared by Rolfe Judd Planning;
- / Approved and Proposed Site Layout – prepared by JTP Studios;
- / FRA & SuDS Strategy Report – prepared by the PES; and
- / Covering Letter (*this document*) – prepared by Rolfe Judd Planning.

The requisite planning application fee will be paid online via the Planning Portal on the date of submission.

SITE CONTEXT

The Application Site measures at approximately 9,824 sqm and is situated within the Norfolk Road Industrial Estate and the Gravesend Riverside East and North East Gravesend Opportunity Area (GRE&NEGOA). The Site formerly comprised two gasholders; however, these have been decommissioned.

The Site is bound to the north, east, and south by the other industrial uses within the Estate, and to the west and northwest by residential properties. The Site is not within a Conversation Area, and does not comprise any listed buildings, or heritage assets. In terms of planning, the Site is subject to the following designations:

- / Gravesend East and North East Opportunity Area;
- / Flood Zone 3a; and
- / Norfolk Road Industrial Estate.

PLANNING BACKGROUND

Planning Application ref. 20240960 was approved on the 19th of March 2025 for the following description of development:

Change of use to open storage (Use Class B8) with associated works, cycle and car parking.

Condition 2 of the decision notice states:

The development hereby permitted shall be carried out in strict accordance with the following approved plans/drawings;

- *Application Form - dated 21 October 2024;*
- *Covering Letter by Rolfe Judd - dated 18 October 2024;*
- *Planning, Design and Access Statement by Rolfe Judd (dated 18 October 2024);*
- *Agent of Change Principle Assessment by Rolfe Judd (dated 16 January 2024);*
- *Transport Statement by SLR (Vectos (South) Limited - dated 20 March 2024;*
- *Air Quality Technical Note by The PES (dated 25 March 2024);*
- *Noise Impact Assessment (ref. J643_R01) by ALN acoustic design - dated 20 March 2024;*
- *Flood Risk Assessment & SuDS Strategy Report (FRA20197.1) by The PES - dated 20 March 2024;*
- *Ground Condition Desk Top Study by GCC - dated March 2024;*
- *Drawing no. AR-XX-XX-XX-DR-0001-001 - Site Location Plan (scale - 1:1250);*
- *Drawing no. AR-XX-XX-XX-DR-0001-002 - Existing Site Plan (scale - 1:500);*
- *Drawing no. AR-XX-XX-XX-DR-0001-003 - Rev. D - Proposed Site Plan (scale - 1:500).*

PROPOSED CONDITION AMENDMENTS

This application seeks to amend Condition 2 of the decision notice, to allow for an amended layout of the external storage area at the Site. To this end, the application seeks to following amendments to Condition 2:

CONDITION WORDING	PROPOSED CONDITION WORDING
<i>The development hereby permitted shall be carried out in strict accordance with the following approved plans/drawings;</i> • <i>Application Form - dated 21 October 2024;</i> • <i>Covering Letter by Rolfe Judd - dated 18 October 2024;</i> • <i>Planning, Design and Access Statement by Rolfe Judd (dated 18 October 2024);</i> • <i>Agent of Change Principle Assessment by Rolfe Judd (dated 16 January 2024);</i> • <i>Transport Statement by SLR (Vectos (South) Limited - dated 20 March 2024;</i> • <i>Air Quality Technical Note by The PES (dated</i>	<i>The development hereby permitted shall be carried out in strict accordance with the following approved plans/drawings;</i> • <i>Application Form - dated 21 October 2024;</i> • <i>Covering Letter by Rolfe Judd - dated 18 October 2024;</i> • <i>Planning, Design and Access Statement by Rolfe Judd (dated 18 October 2024);</i> • <i>Agent of Change Principle Assessment by Rolfe Judd (dated 16 January 2024);</i> • <i>Transport Statement by SLR (Vectos (South) Limited - dated 20 March 2024;</i> • <i>Air Quality Technical Note by The PES (dated</i>

25 March 2024); - Noise Impact Assessment (ref. J643_R01) by ALN acoustic design - dated 20 March 2024; Flood Risk Assessment & SuDS Strategy Report (FRA20197.1) by The PES - dated 20 March 2024; - Ground Condition Desk Top Study by GCC - dated March 2024; - Drawing no. AR-XX-XX-XX-DR-0001-001 - Site Location Plan (scale - 1:1250); - Drawing no. AR-XX-XX-XX-DR-0001-002 - Existing Site Plan (scale - 1:500); Drawing no. AR-XX-XX-XX-DR-0001-003 - Rev. D - Proposed Site Plan (scale - 1:500).	25 March 2024); - Noise Impact Assessment (ref. J643_R01) by ALN acoustic design - dated 20 March 2024; Flood Risk Assessment & SuDS Strategy Report (FRA20197.1) by The PES - dated 11th July 2025; - Ground Condition Desk Top Study by GCC - dated March 2024; - Drawing no. AR-XX-XX-XX-DR-0001-001 - Site Location Plan (scale - 1:1250); - Drawing no. AR-XX-XX-XX-DR-0001-002 - Existing Site Plan (scale - 1:500); Drawing no. AR-XX-XX-XX-DR-0001-003 – REV G - Proposed Site Plan (scale - 1:500).
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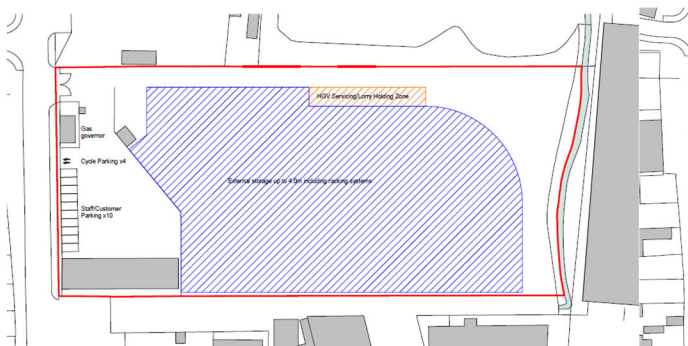


Image 1: Approved Site Layout Plan

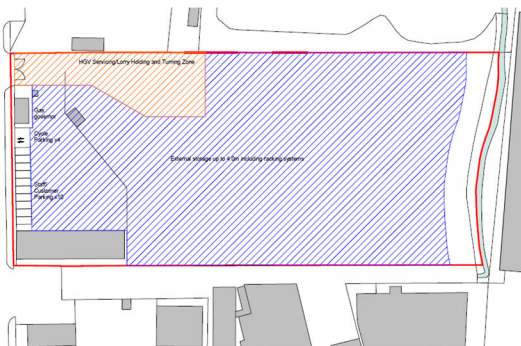


Image 2: Proposed Site Layout Plan

The amended layout will optimise the functionality and viability of the Site, in-line with its established Class B8 (storage and distribution) use. The revisions to the layout have been made in consideration of operator requirements and the applicant's operational experience on similar sites. The amended site layout is supported by updated FRA and SuDs strategy, which ensures that the scheme would not cause any undue impact due to surface water flooding as a result of the proposed change.

The proposed layout retains the requisite cycle and car parking spaces, in accordance with the relevant planning policies and does not include the addition of any built elements to the Site. The amended layout has also ensured that there is sufficient space for HGV servicing, lorry holding and turning.

SUMMARY

This planning application seeks to vary Condition 2 of the decision notice for planning application ref. 20240960 to allow for an amended Site Layout Plan for the established external Storage (Class B8) use. As outlined above, the new proposed layout has been conceptualised in consideration of the forthcoming operator's on-site requirements, and the applicant's operational experience on similar sites. The change to the proposed layout would not cause any adverse impacts to the site and the surrounding area, and the layout retains sufficient cycle and car parking, as well as servicing and access areas. As such, the amendment is considered to be acceptable in planning terms.

We trust that the Council has sufficient information to validate and determine the application, however, should you require any further information please do not hesitate to contact the undersigned.

Yours faithfully



For and on behalf of
Rolfe Judd Planning Limited