



FAO - Katherine Parkin,  
Gravesham Borough Council,  
Civic Centre,  
Windmill Street,  
Gravesend,  
Kent,  
DA12 1AU

7<sup>th</sup> February 2025

Dear Katherine,

**Town and Country Planning Act 1990 (As Amended)**  
**Application ref. 20241011 - Land and Buildings at Seacon Site, Tower Wharf, Lower Road,**  
**Northfleet, Gravesend**  
**Representations on behalf of Northfleet Harbourside Development Co.**

We write as a neighbouring landowner   
 The  
application referred to above seeks approval for the following:

*'Extension of existing storage warehouse to provide a bagging and packaging facility for aggregates and cementitious products, incorporating extensions to both sides, a new warehouse section to the south and silos to the side.'*

Having considered the application material, we write to raise our objection to the application due there being insufficient information and an inadequate consideration of all material considerations.

**Further information required**

Our principal observation is that we are concerned that as a "major application" insufficient information and assessment has been undertaken to allow statutory consultees and the wider public to fully review and consider the implications of the proposal.

To allow us to assess and understand the proposals we would request that further information is provided in respect of the following, noting that similar comments have been raised by statutory bodies.

- A supporting Design and Access Statement;

This is a national validation requirement for major development, and it is considered that the currently submitted Planning Statement doesn't provide sufficient explanation of the design principles incorporated within the proposal. The current submission pack fails to sufficiently appraise the design rationale for the scheme and access provision, nor does it consider the wider context and how the development aligns with the area. This is

particularly lacking in respect of forthcoming development around the site which is a material consideration.

- Transport Assessment that fully considers the transport implications;

The comments in respect of transport within the noise and air quality assessments are noted, however are considered to be insufficient, as it lacks the technical rigour to support the assumptions presented. Whilst it is claimed that the proposal will not result in a significant uplift in movements, there are a large number of movements already taking place and with the ongoing temporary road closure at A226 Gallery Hill Road, Swanscombe, we are of the opinion that it is crucial that transport impacts are fully considered and explored through an appropriate level of assessment in line with local validation requirements.

- Flood Risk and Drainage Assessments;

No flood related information nor a drainage strategy has been provided despite the application falling within Flood Zone 3 (high probability of flooding) or a requirement to sustainably manage surface water runoff. With the proposal comprising a substantial increase in built form, we are concerned that if this is not appropriately assessed this could result in increased levels of surface water run-off. There has been no demonstration as to how any risks for flooding to and from the development will be managed. In line with local validation requirements, it is requested that a Flood Risk Assessment and SUDS Strategy be provided for consideration and assessment.

In this respect we echo the requests from Kent County Council Flood and Water Management and Southern Water in seeking further information on this ahead of the determination of the application.

- Ecology Assessment;

No ecological information has been provided as part of the application. Given the proximity of the Site to the nearby SSSI and because of the proposed alterations to existing roofs we would expect to see a preliminary ecological appraisal be prepared and submitted in support of the application. This would align with local validation requirements, and allow for ecological clarification of the currently set out Biodiversity Net Gain position proposed within the application forms.

At this stage we question whether the statement provided within the currently submitted application forms regarding Biodiversity Net Gain and the stated de minimis exemption is indeed factually correct and there appears to be areas of greenscape on the Site including trees and scrub. The lack of ecological information provided at present leaves a significant amount of uncertainty regarding this element, and given BNG is a statutory requirement clarification is needed on this matter.

Given the immediate proximity of the nearby SSSI to the West, it would be beneficial to see a high-level assessment giving consideration to the implications of the proposal upon the Site, or hopefully affirming that the proposals will have no impact upon the Site.

- Energy and Sustainability Assessment;

No energy or sustainability information has been provided in respect of this application. As the application proposes the large scale extension of existing buildings and a new warehouse section in excess of 1,000sqm is proposed. We consider that in line with local validation requirements further information should be provided in terms of energy and water consumption as well as the emissions and BREEAM level that would be achieved from the proposal.

- Land Contamination Assessment;

No assessment in respect of contamination has been submitted in relation to the proposals given the history and industrial nature of the site and wider area it necessary to conclude whether there is likely contamination. A preliminary risk assessment in the form of a Phase 1 assessment should be undertaken in line with local validation requirements for major development.

- An Arboricultural Impact Assessment and Tree plan;

Subject to confirmation of any trees within the proposed development, there are trees in proximity that may be impacted as a direct result of the proposal. In line with local validation requirements we request that further information is provided through assessment and plans clarifying the species, position and canopy spread as well as clarification of measures that will be adopted during construction to protect identified trees.

- Clarification on ventilation or extraction equipment

Due to the limited information provided within the application submission it is unclear if the proposals will include ventilation and or extraction equipment as part of the proposals. In line with local validation requirements, if these are proposed an appropriate statement providing further information of this is requested.

The application should not be approved until this information is provided in accordance with local and national validation requirements.

Following the submission and provision of these we would then request that a further minimum of 21 day reconsultation is undertaken to allow stakeholders to review and provide a response.

### **Prejudicing future development**

We note that the application redline boundary overlaps with that of the live application Northfleet Harbourside (ref. 20221064). This application has received a resolution to grant at the 30<sup>th</sup> April 2024 Gravesham planning committee and as such is a material consideration in the determination of this application since the Section 106 is nearly concluded.

The concern in respect of this element is that as a result of the current design of the proposals there is not a cumulative position where in which both applications could proceed on the basis of the proposed plans to extend the building. An approval of this application in its current iteration would necessitate adjustments to the Northfleet Harbourside scheme to ensure its delivery. Such alterations to the proposal could impact upon the extent of the public open space provided within the scheme, and potentially require amendment to the proposed indicative highway route along the

Seacon boundary which has been established and accepted by National Highways and Kent County Council within the Northfleet Harbourside scheme.

The compulsory purchase order process in respect of land regarding application ref. 20221064 Northfleet Harbourside is being undertaken with discussions in respect of this ongoing. If the applicant is seeking to confirm development, then there are alternative methods for doing so under the compulsory purchase legislation.

### **Closing and concluding comments**

To summarise our observations, we currently object on the basis that there is insufficient information submitted within application ref. 20241011. We further object to the application as a result of its impact upon application ref. 20221064 Northfleet Harbourside with no assessment of the implications undertaken within the application and will result in impacting the Northfleet Harbourside masterplan and upon the applications and Council's wider regeneration objectives.

Thank you for the opportunity to provide comment. We reserve the right to provide further comments following the submission of additional information provided by the applicant to support application ref. 20241011.

Yours sincerely,

