

PLANNING, DESIGN AND ACCESS STATEMENT

2 VALE ROAD

Northfleet, Gravesend, Kent

Prepared in support of a full planning application resubmission following refusal of application 20260294

Applicant: Mr Zeqir Berisha

Date: August 2026

APPLICATION DESCRIPTION

Change of use of part of an established commercial/industrial site to a hand car wash and valeting facility (sui generis), including two tensile fabric canopies over the vehicle wash bays, pump/compressor house, acoustic screening, drainage infrastructure, boundary treatment, containerised landscaping and associated works.

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Document Control

Item	Details
Document	Planning, Design and Access Statement
Site	Part of land at 2 Vale Road, Northfleet, Gravesend, Kent
Applicant	Mr Zeqir Berisha
Application type	Full Planning Permission - Resubmission
Previous application	20260294 - refused 11 May 2026
Status	Planning Application Submission
Date	August 2026
Prepared by	Design Solutions AP Ltd

Contents

- 1** Executive Summary
- 2** Introduction and Scope
- 3** Application Site and Context
- 4** Site History and Existing Use
- 5** Planning History and Material Background
- 6** The Proposed Development
- 7** Resubmission Strategy and Response to Previous Decision
- 8** Design Evolution and Character
- 9** Planning Policy Framework
- 10** Planning Assessment
- 11** Access, Highways and Movement
- 12** Operational Management
- 13** Noise and Residential Amenity
- 14** Contamination and Controlled Waters
- 15** Drainage and Trade Effluent
- 16** Biodiversity, Landscaping and Security
- 17** Proactive Engagement and Condition-Based Controls
- 18** Planning Balance and Conclusion

Appendix A Response to Refusal Matrix

Appendix B Policy Compliance Matrix

Appendix C Schedule of Commitments and Suggested Conditions

Appendix D Documents and References

Purpose of this statement

This statement explains the planning merits, design rationale, access arrangements, operational controls, acoustic mitigation, contaminated-land response, drainage strategy and planning balance associated with the resubmitted hand car wash proposal. It should be read alongside the revised application drawings, Acoustic Survey and Assessment, Contaminated Land Review and supporting technical appendices. Particular emphasis is placed on demonstrating how the three reasons for refusal attached to application 20260294 have been comprehensively addressed.

1. Executive Summary

This Planning, Design and Access Statement has been prepared on behalf of Mr Zeqir Berisha in support of a full planning application for the change of use of a small parcel of land at 2 Vale Road, Northfleet to a professionally managed hand car wash and vehicle valeting facility. The application land extends to approximately 573 sq m and forms only a small part of a much larger commercial/industrial landholding of approximately 9,881 sq m.

The application is a resubmission following Gravesham Borough Council's refusal of application 20260294 on 11 May 2026. The previous refusal was based on three discrete matters: the design, character and appearance of the proposal; insufficient evidence regarding noise and disturbance; and insufficient evidence regarding contamination and the protection of controlled waters. The Council did not refuse the proposal on the principle of development or highway safety grounds.

The resubmitted scheme has not simply repeated the refused proposal. It has been revised in direct response to the officer report and consultee comments. A new site-specific acoustic assessment has been undertaken by Martin Environmental Solutions Ltd; a new car-wash-specific contaminated-land review has been prepared; the drainage arrangement has been clarified and revised; additional acoustic barriers have been incorporated; vehicle entry and exit swept-path drawings have been provided; frontage planting is proposed within contained planters; and the former canopy above the drying area has been omitted to improve internal manoeuvrability and reduce built form.

The revised acoustic assessment records a daytime background sound level of 46.5 dB LA90 with the wider industrial estate non-operational. Following redesign and mitigation, predicted operational sound levels are approximately 38 dB(A) at the nearest ground-floor receptor and approximately 42-44 dB(A) at other and upper-floor receptors. The report calculates a conservative BS4142 rating level of 47 dB against the measured 46.5 dB background, a difference of only +0.5 dB, and concludes that no significant adverse noise impact will occur.

The contamination evidence has similarly been brought up to date for the actual commercial car wash proposal. The August 2026 review considers the earlier Phase I and Phase II work, a new site walkover, the proposed end use, the principal aquifer and relevant source-pathway-receptor relationships. The design response includes impervious hardstanding, a closed drainage arrangement, containerised planting and a watching brief during construction. Wash water and operational runoff will not be discharged to ground.

The revised drainage strategy collects wash water through ACO channels, passes it through a dedicated silt trap and three-stage vehicle wash separator, and then connects to the existing foul drainage system via the existing on-site manhole. Any trade effluent consent or other operational approval required by the relevant sewerage undertaker will be obtained separately before operation.

The proposal also benefits from strong land-use support. The application parcel is previously developed land within the urban area and is currently vacant and underutilised. National decision-making Policy L2 of the August 2026 National Planning Policy Framework requires substantial weight to be given to the benefits of remediating degraded or contaminated land and making better use of vacant and underutilised land and buildings. The proposal brings a small, vehicle-related brownfield frontage back into productive commercial use without creating a new access or requiring greenfield land.

Overall conclusion

The resubmission now provides the design revisions and technical evidence which the previous officer report said were missing. The principle of the use was previously accepted, highways raised no objection, and the three previous refusal reasons are capable of being overcome by the revised design, acoustic mitigation and controlled-water protection strategy now submitted. When the development plan and current NPPF are read as a whole, planning permission should be granted subject to appropriate and proportionate conditions.

2. Introduction and Scope

2.1 Applicant and purpose

This statement has been prepared by Design Solutions AP Ltd on behalf of the applicant, Mr Zeqir Berisha. It accompanies a full planning application for the use of part of the wider commercial/industrial site at 2 Vale Road as a hand car wash and valeting facility.

The applicant operates a number of established car wash businesses. The nearest comparable operation is located close to the A2 and Bluewater and has been successfully operated by the applicant for more than 20 years. That experience is relevant to the practical management of the proposal, including customer flow, equipment operation, site maintenance and environmental compliance.

2.2 Application description

The formal application description is proposed as:

Proposed development

Change of use of part of an established commercial/industrial site to a hand car wash and valeting facility (sui generis), including two tensile fabric canopies over the vehicle wash bays, pump/compressor house, acoustic screening, drainage infrastructure, boundary treatment, containerised landscaping and associated works.

2.3 Supporting documents

The application is accompanied by, or should be read with, the following principal documents:

- Location Plan, drawing DS213-LP-01;
- Existing Site Plan, drawing DS213-ESP-01;
- Revised Proposed Site Plan, drawing DS213-PSP-01A;
- Revised Proposed Drainage Plan, drawing DS213-PDP-01A, amended to identify impermeable hardstanding and no infiltration to ground;
- Swept Path Analysis - Vehicle Entering the Site, drawing DS213-SPA-01;
- Swept Path Analysis - Vehicle Exiting the Site, drawing DS213-SPA-02;
- Canopy plan and elevations, drawing DS213-001, previously submitted and included again for detailed canopy design information;
- Existing and Proposed Street Scene Visuals;
- Acoustic Survey and Assessment, Martin Environmental Solutions Ltd, Report No. 3302-1, August 2026;
- Contaminated Land Review, Martin Environmental Solutions Ltd, Report No. 3283-1, August 2026, together with supporting Appendices 1, 1A, 2 and 3;
- Car wash silt trap/drainage equipment technical information; and
- This Planning, Design and Access Statement.

2.4 Scope and limitations

This statement provides a planning-stage appraisal based on the revised application drawings and submitted specialist evidence. Matters controlled under separate environmental, drainage, trade effluent, health and safety and building/engineering regimes will be addressed through those processes where applicable. The planning application nevertheless provides sufficient information to establish the acceptability of the use, layout, design, access, noise controls and pollution-prevention strategy.

3. Application Site and Context

3.1 Location and scale

The application land lies on the western side of Vale Road at Northfleet and forms part of the much larger landholding at 2 Vale Road. The wider site extends to approximately 9,881 sq m. The application parcel extends to approximately 573 sq m and therefore represents only about 5.8% of the wider site area.

This distinction is material to the assessment of scale and character. The proposal is not the wholesale redevelopment of the commercial site. It is the controlled reuse of a small, clearly defined frontage parcel within an established previously developed landholding.

3.2 Surrounding uses and character

The immediate setting is mixed. Vale Road runs along the eastern edge of the site, with two-storey residential properties on the opposite side of the road. The application land itself forms part of an established commercial/industrial environment. A substantial garage/commercial building lies immediately to the north and the wider site extends to the west and south. Railway land and the railway corridor lie further to the south.

The historic environmental assessments record a broad range of vehicle and industrial activity across the wider site, including garage uses, vehicle repair, vehicle hire, coach and lorry activity, parked vehicles, haulage operations, skips and other commercial uses. The Council's previous officer report itself described the wider landholding as a commercial site with a variety of buildings, areas of hardstanding and fencing.

The character of the locality must therefore be assessed as a mixed urban commercial/residential environment. The presence of housing opposite is an important amenity consideration, but it does not convert the application land or the wider western side of Vale Road into a wholly residential setting.

3.3 Existing access and site condition

Access is obtained from Vale Road through the existing commercial site entrance. No new vehicular crossover or additional access is proposed. The application area is already defined and largely hard surfaced, and is currently vacant and underutilised.

4. Site History and Existing Use

4.1 Vehicle-related and commercial history

The site has a long history of vehicle-related and commercial activity. Historic mapping reviewed in the environmental reports identifies a garage by the early 1950s, possible petrol filling station activity by the 1960s, structures and tanks during the later twentieth century, HGV activity across the wider site by 1990 and car sales activity on or close to the application parcel by approximately 2003.

The application parcel was historically associated with a petrol filling station and vehicle washing activity and was subsequently used in connection with used-car sales. The wider landholding has also been used for the sale and rental of cars and lorries and other commercial vehicle-related purposes.

4.2 Previously developed land

The application land is plainly previously developed land. It comprises established hardstanding and has historically accommodated structures and commercial operations. Its reuse does not involve development of greenfield land and is consistent with the national objective of making effective use of land within existing settlements.

The current vacancy does not erase the established commercial and vehicle-related history of the land. The proposal restores productive activity to a small brownfield parcel in a manner which uses existing access and site infrastructure while introducing modern environmental controls.

5. Planning History and Material Background

5.1 Residential redevelopment history

The wider site has a substantial planning history for residential redevelopment. The previous officer report records application 20190727 for 10 two-bedroom flats as permitted in October 2019; application 20211582 for 14 two-bedroom flats as refused in May 2022 and subsequently allowed on appeal; application 20240998 as permitted in March 2025 to vary the appeal scheme; and application 20250559 as approved in July 2025 for a non-material amendment.

At the time application 20260294 was determined, the officer report recorded that the residential permission and car wash red lines overlapped and that the permissions could not both be implemented. The officer therefore expressly concluded that it was not necessary to assess the amenity of hypothetical future occupiers of that residential scheme. The current application relies on that site-specific finding and focuses its amenity assessment on existing neighbouring residents.

The wider residential redevelopment has not progressed and viability and market delivery difficulties have resulted in the wider site remaining substantially vacant and underused. The current proposal should be considered on its own planning merits as the productive reuse of a small portion of previously developed commercial land.

5.2 Previous car wash application 20260294

Application 20260294 sought permission for a hand car wash facility and was refused on 11 May 2026. The refusal notice identified three reasons:

- Design, character and appearance: the Council considered that the nature and appearance of the car wash would not conserve or enhance the surrounding area or integrate successfully with it;
- Noise and disturbance: the Council considered that the submitted information did not sufficiently demonstrate that neighbouring amenity would be protected; and
- Contamination and controlled waters: the Council considered that the submitted information did not sufficiently demonstrate that risks from land contamination to controlled waters were acceptable.

No reason for refusal was imposed on the principle of the use, highway safety, loss of outlook, privacy, daylight or sunlight, or biodiversity. The previous officer report specifically found the proposal acceptable in principle within the urban boundary, found no conflict with Policy CS07, concluded that neighbouring properties would not suffer loss of outlook, privacy, sunlight or daylight, and raised no highway objection because the existing access would be used.

5.3 Community and consultee context

The previous application generated two letters of objection and 15 letters of support, with matters raised including noise, traffic, runoff, visual impact and mitigation. These issues, together with the technical consultee comments, have informed the redesign and the preparation of the new technical package.

6. The Proposed Development

6.1 Use and layout

The proposal is for a professionally managed hand car wash and valeting facility occupying approximately 573 sq m. The layout provides two principal wash bays, a separate drying/valeting area, internal vehicle circulation, a pump/compressor enclosure, acoustic barriers, drainage treatment infrastructure and contained frontage planting.

6.2 Tensile fabric canopies

Two tensile fabric canopy structures are proposed over the principal vehicle wash area. Each canopy measures approximately 5 m by 8 m. Their purpose is to provide weather protection for staff and vehicles while retaining the lightweight, open character appropriate to a hand car wash facility.

The earlier scheme included a further canopy over the drying area. That canopy has been deliberately omitted from the resubmission because its corner posts constrained the turning movement between the wash area and the drying area.

Removing it improves vehicle manoeuvrability, simplifies the layout and reduces the amount of structure visible within the site. The drying/valeting area therefore remains uncovered in the revised scheme.

Drawing DS213-001 is included to show the detailed form and elevations of the canopy type. The current Proposed Site Plan controls the number and location of the two canopies within the resubmitted layout.

6.3 Acoustic screening and plant

The revised scheme incorporates the acoustic mitigation identified through the new acoustic modelling. The compressor is housed within an enclosure behind acoustic screening and will receive the additional insulation assumed by the assessment. The layout includes solid acoustic elements to the rear and south and clear acrylic or glass screening to the central/front portions of the site, with the transparent treatment preserving visual openness along the street-facing edge.

6.4 Frontage treatment and landscaping

The Vale Road frontage is upgraded through a coherent boundary treatment and planting. Planting is provided within contained planters rather than directly in the ground, allowing the landscape treatment to soften views of the development while remaining consistent with the contaminated-land strategy and avoiding a new infiltration pathway.

7. Resubmission Strategy and Response to Previous Decision

7.1 A materially revised application

This application is not a repeat submission. Each refusal reason has been traced back to the specific findings in the refusal notice, delegated report and consultee responses, and the resubmission has been prepared to answer those points directly.

Previous issue	What was missing / criticised	Current response
Reason 1 - character and appearance	Officer considered the car wash visually sporadic and insufficiently integrated with the more residential street-facing context.	Reduced and rationalised built form; drying canopy removed; frontage planting in contained planters; coherent boundary treatment; clear acoustic screens; existing/proposed street-scene visuals; fuller mixed-context and site-history justification.
Reason 2 - noise and disturbance	Previous noise material was not accepted as a noise impact assessment and did not adequately assess noise-sensitive receptors. GBC Environmental Protection requested a full BS4142 assessment.	New August 2026 site-specific acoustic survey; measurements taken at Vale Road; nearest existing houses modelled; equipment-specific data; design altered in response to modelling; BS4142 exercise completed; defined acoustic mitigation and restricted daytime operating hours.
Reason 3 - controlled waters	Earlier reports were prepared for residential use; current conditions and intrusive works were unclear; drainage information conflicted; permeable surfacing and runoff destination were unclear.	New August 2026 car-wash-specific contaminated-land review and site walkover; revised conceptual model; impervious hardstanding; no infiltration to ground; closed drainage route; silt trap and three-stage separator; foul connection clarified; localised intrusive works managed under a watching brief.

7.2 Principle and highways already accepted

The previous delegated report expressly accepted that the site lies within the urban boundary where appropriate development is acceptable in principle under Policy CS02. It also found that the former vehicle-related use meant the proposal did not conflict with Policy CS07. KCC Highways raised no substantive objection and the officer concluded that use of the existing access did not justify refusal. Those findings remain important material considerations.

8. Design Evolution and Character

8.1 Previous design concern

The previous officer considered that a car wash in this location would appear out of character with the residential frontage opposite and described the combination of structures as sporadic development on a currently open parcel. The officer concluded that the proposal would not be visually attractive, fit for purpose or locally distinctive.

8.2 Correct contextual assessment

The revised assessment begins with the full site context. The houses opposite are part of the setting and must be respected, but the application land is physically and functionally part of an established commercial/industrial site. The substantial garage to the north, extensive hardstanding and fencing, the historic vehicle uses and the railway corridor to the south are equally relevant components of local character.

A contextual design response does not require a commercial use on a commercial site to imitate the architecture of the Victorian terrace opposite. It requires the proposal to be ordered, appropriately scaled, visually managed and capable of integrating with the mixed surroundings. The resubmission now achieves that.

8.3 Design revisions

- The former canopy over the drying area has been removed, reducing visual clutter and built form while improving internal vehicle movement;
- The two remaining 5 m x 8 m canopies are lightweight tensile structures over the functional wash bays rather than bulky enclosed buildings;
- The acoustic strategy uses transparent screening where appropriate along the more visible parts of the site, preserving visual permeability;
- Contained frontage planting softens the view from Vale Road without introducing planting directly into potentially affected ground;
- The revised layout has a clear entrance, wash, drying and exit sequence rather than an ad hoc arrangement of structures; and
- The street-scene presentation demonstrates a managed commercial frontage replacing a vacant, fenced and visually weak parcel.

Existing street scene



Street-scene visual submitted with the resubmission application.

Proposed street scene

Street-scene visual submitted with the resubmission application.

8.4 NPPF design test

Current national decision-making Policy DP3 requires proposals to respond to the history, character and features of their site and setting so that they integrate with and enhance their surroundings. The policy expressly recognises that this should not preclude innovation or change where appropriate. The revised proposal responds to the actual mixed commercial/residential context, provides a coherent identity through materials, screening and planting, and improves the presentation of an otherwise vacant brownfield frontage.

9. Planning Policy Framework**9.1 Statutory development plan**

Planning applications are to be determined in accordance with the development plan unless material considerations indicate otherwise. The Council's previous delegated report identified the principal adopted policies relevant to this proposal as Policies CS01, CS02, CS07, CS11, CS12, CS18 and CS19 of the Gravesham Local Plan Core Strategy 2014, together with relevant saved policies of the Gravesham Local Plan First Review 1994 including P3, T1 and T5.

9.2 Gravesham Local Plan Core Strategy

Policy	Relevant requirement / application
CS01 - Sustainable Development	Supports sustainable development and efficient use of land and resources. The proposal reuses a vacant brownfield parcel within the urban area.
CS02 - Scale and Distribution of Development	The previous officer accepted the principle of appropriate development at this location within the urban boundary.
CS07 - Economy, Employment and Skills	The previous officer found no conflict with this policy. The proposal creates productive commercial activity and employment on an established commercial site.
CS11 - Transport	Existing access is retained; no new access is proposed; separate entering and exiting swept-path analyses demonstrate workable vehicle circulation.
CS18 - Climate Change / water quality	The revised strategy prevents infiltration of car-wash runoff, provides controlled drainage and treatment, and responds directly to groundwater and controlled-water sensitivity.
CS19 - Development and Design Principles	The revised design is ordered, fit for purpose and contextual; noise and neighbouring amenity are addressed through site-specific assessment and mitigation; the frontage is improved through screening and contained planting.

9.3 Design for Gravesham - Design Code SPD 2024

The Council's Design for Gravesham Design Code SPD supports the implementation of Policy CS19 and is a material consideration. The revised proposal has been assessed against the central objectives of contextual design, clear layout, appropriate boundary treatment, landscape integration, safe movement and functional operation. The proposal is modest in scale and the design has evolved directly in response to the Council's previous concerns.

9.4 National Planning Policy Framework - August 2026

A new National Planning Policy Framework was published on 17 August 2026 and replaces the December 2024 Framework cited in the previous refusal. The current application must therefore be assessed against the August 2026 national decision-making policies.

National policy	Relevance to the proposal
L2 - Making effective use of land	Substantial weight is to be given to benefits from remediating degraded or contaminated land and making better use of vacant and underutilised land and buildings. The application reuses a vacant brownfield parcel within an urban commercial site.
DP3 - Key principles for well-designed places	Development should respond to its history, character and setting so that it integrates with and enhances its surroundings. The revised layout, lightweight canopies, transparent acoustic screens, contained planting and coherent frontage respond to the mixed context.
P2 - Ground conditions	Sites should be suitable for their proposed use taking account of contamination and the extent to which risks can be mitigated, supported by adequate assessment from a competent person. The new contaminated-land review is specific to the car wash proposal.
P3 - Living conditions and pollution	Development should avoid or mitigate unacceptable noise, water, soil and other pollution; noise should be reduced to a minimum and significant observed adverse effects avoided. The new acoustic assessment and closed drainage strategy directly address this policy.

9.5 Emerging Gravesham Local Plan 2042

The proposed Gravesham Local Plan 2042 has reached Regulation 19 Proposed Submission stage. Consultation closed on 18 August 2026 and the Council anticipates submission for examination in autumn 2026. The emerging plan is a material consideration but is not adopted and does not replace the current development plan. Its strategic objective of making efficient use of land and facilitating brownfield regeneration is consistent with the underlying land-use case for this application, but the proposal does not depend upon the emerging plan for acceptability.

10. Planning Assessment

10.1 Principle of development

The principle of the use should be regarded as established as acceptable. In refusing application 20260294 the Council did not identify a policy objection to the principle. The officer expressly concluded that the site is within the urban boundary where appropriate development is generally acceptable under Policy CS02 and that the former sale and rental of cars and lorries meant there was no conflict with Policy CS07.

The proposal additionally accords with the current national objective of making effective use of land. The application affects only around 5.8% of the wider landholding and returns a vacant, previously developed parcel to an economically productive use.

10.2 Brownfield regeneration and economic benefit

The proposal provides a direct brownfield benefit. It uses existing hardstanding, existing access and existing urban infrastructure rather than requiring undeveloped land. It supports an established business operator, provides employment and local services and improves oversight and management of a currently vacant frontage.

These benefits are entitled to substantial weight under NPPF Policy L2 insofar as the proposal makes better use of vacant and underutilised land and responds to a site with known historic contamination issues through a controlled design and drainage strategy.

10.3 Residential amenity other than noise

The previous officer concluded that, because of the separation between the car wash and existing residential properties, there would be no detrimental effect in terms of loss of outlook, privacy, sunlight or daylight. The revised scheme reduces built form further by omitting the drying-area canopy. Those amenity conclusions therefore remain applicable and, if anything, are strengthened by the revised layout.

11. Access, Highways and Movement

11.1 Existing access

All customer and staff vehicle movements will use the existing commercial access from Vale Road. No new access, dropped kerb or additional opening to the public highway is proposed.

11.2 Highway consultation

Kent County Council Highways did not identify a material highway safety issue on the previous application. The Council's final officer assessment expressly concluded that the development would use an existing access and that no highway objection was raised.

11.3 Swept path analysis

The resubmission provides separate swept-path drawings for vehicles entering and exiting the site. These demonstrate that a representative customer vehicle can turn into the site, circulate through the operational layout and leave through the established access without requiring inappropriate manoeuvring on Vale Road.

The omission of the former drying canopy is also a practical highway and operational improvement. Removing the corner posts from the drying area provides a clearer path between the wash bays and drying positions and reduces potential conflict during internal manoeuvring.

11.4 Queue management

Customer intake will be managed within the site. Vehicles will not be deliberately queued or held on Vale Road. If the internal operational capacity is temporarily reached, additional vehicles will not be admitted until sufficient on-site space becomes available.

12. Operational Management

12.1 Operating hours

The acoustic assessment is based on operation between 09:00 and 17:00. The applicant is willing for those operating hours to be secured by planning condition. The proposal therefore does not rely on evening or night-time operation.

12.2 Equipment and working method

The acoustic assessment is based on two jet washers, an insulated compressor enclosure and a vacuum. Plant will not be left operating unnecessarily and the compressor enclosure will remain closed during operation. The acoustic screens and additional compressor treatment identified by the specialist assessment will be installed before first use and retained thereafter.

12.3 Management and maintenance

The applicant's established operational experience will inform day-to-day management. The site will be kept orderly, drainage channels and separator infrastructure will be maintained, customer circulation will be managed, and the acoustic barriers and plant enclosure will be retained in effective condition.

13. Noise and Residential Amenity

13.1 Previous reason for refusal

The second reason for refusal did not conclude that unacceptable noise had been proven. It concluded that the submitted application did not sufficiently demonstrate that the development would avoid detrimental noise and disturbance. GBC Environmental Protection specifically stated that the earlier material did not qualify as a noise impact assessment and requested a full BS4142 assessment addressing the houses opposite.

13.2 New site-specific acoustic evidence

Martin Environmental Solutions Ltd has now prepared an Acoustic Survey and Assessment, Report No. 3302-1, dated August 2026. Monitoring was undertaken at the Vale Road site on 1 July 2026 using a calibrated sound level meter positioned along the eastern boundary nearest the existing residential properties. The survey recorded an average daytime ambient level of 59.4 dB LAeq and a background level of 46.5 dB LA90. The wider industrial estate was non-operational during the monitoring period, making the measured background a conservative basis for assessing the car wash in isolation.

13.3 Design-led acoustic mitigation

The acoustic consultant did not merely assess the original layout. Initial modelling identified levels of up to approximately 52 dB(A) at the nearest facade, following which the design was altered. The revised layout incorporates an enclosed and additionally insulated compressor, solid acoustic elements to the rear and south, and 3.5 m clear acrylic or glass acoustic screening to the central/front areas. The report specifies that the acoustic barriers are to be installed without gaps between sheets or at the bottom.

13.4 Predicted receptor levels

With the mitigation incorporated, predicted external sound levels are approximately 38 dB(A) at the nearest ground-floor receptor, approximately 42 dB(A) at other nearby ground-floor receptors and approximately 42-44 dB(A) at first-floor receptors. These values are below the measured background sound level of 46.5 dB LA90.

Applying the open-window attenuation considered by the consultant, predicted internal levels are approximately 23-27 dB(A) at ground floor and 27-29 dB(A) at first floor. The report identifies these levels as below the recommended daytime threshold of 35 dB(A) and equivalent to a No Observed Effect Level.

13.5 BS4142 assessment

The Council expressly requested a BS4142 assessment and one has now been provided. The consultant adopted a specific sound level of 44 dB, applied a +3 dB intermittency correction and, conservatively, made no reduction for equipment on-time. This produces a rating level of 47 dB compared with the measured background of 46.5 dB, a difference of only +0.5 dB. The report describes the predicted effect at the worst affected property as an imperceptible adverse impact and concludes that no significant adverse impact will occur.

13.6 Distinction from the appeal cited in the previous officer report

The previous officer referred to appeal APP/Q1445/C/2208695, where residents described a seven-day operation with varying hours extending into the evening, audible jet washing and vacuuming, and disturbance at times when surrounding businesses were closed. The Inspector in that case was not satisfied that practical noise attenuation conditions could overcome the harm.

The present proposal is materially different. It is based on restricted daytime hours of 09:00-17:00, a quantified site-specific background survey, equipment-specific modelling, redesigned acoustic screens, an enclosed and treated compressor, and a conservative BS4142 assessment demonstrating a rating level effectively equal to background. The

specialist evidence also demonstrates acceptable internal noise conditions at existing houses. The factual and evidential basis of the cited appeal is therefore not comparable to this resubmission.

13.7 Conclusion on Reason 2

The precise evidential deficiency identified by GBC Environmental Protection has now been remedied. The resubmission contains a full site-specific assessment, the requested BS4142 exercise and physical mitigation integrated into the proposed design. Reason for Refusal 2 has therefore been overcome.

14. Contamination and Controlled Waters

14.1 Previous Environment Agency objection

The Environment Agency objected to the previous application because the information then submitted did not demonstrate that risks to controlled waters had been fully understood. It identified a number of specific deficiencies: the earlier Phase I and Phase II work had been produced for residential redevelopment; current site conditions had not been adequately updated for the car wash; intrusive works were unclear; drainage information was contradictory; permeable surfacing was shown; and the destination of car-wash runoff was not clear.

Importantly, the Environment Agency also set out how the objection could be overcome. It requested an updated assessment addressing the proposed change of use, confirmation of the drainage design and trade effluent route, clarification that washing would not take place over permeable ground, and clarification of the intrusive works proposed.

14.2 New car-wash-specific contaminated-land review

Martin Environmental Solutions Ltd has now prepared a Contaminated Land Review specifically for the proposed commercial car wash and valeting use, Report No. 3283-1, dated August 2026. The report reviews the earlier Brownfield Solutions and Lustre Consulting investigations, incorporates a new July 2026 site walkover, assesses the actual current end use and identifies relevant sources, pathways and receptors. The assessment has been prepared with reference to current land contamination risk management principles.

14.3 Existing investigation evidence

The earlier intrusive investigations remain relevant factual evidence regarding ground conditions. They identified made ground associated with the historic chalk pit, localised PAH and lead contamination, and former underground fuel storage infrastructure. The supplementary investigation located groundwater at substantial depth and found no evidence of significant hydrocarbon contamination around the identified tanks. The current review reinterprets that evidence for the less sensitive commercial car wash end use rather than relying on residential screening assumptions.

14.4 Revised mitigation strategy

The current contaminated-land review recommends measures that are directly reflected in the planning design:

- Impervious hardstanding across the operational site so that surface water cannot infiltrate through potentially affected ground;
- Planting at the frontage within contained planters rather than directly into the ground;
- A closed drainage arrangement for wash water and operational runoff;
- Appropriate precautions for construction workers and management of excavated materials;
- A watching brief during construction; and
- Investigation, appropriate remedial action and notification to the Local Planning Authority if unexpected contamination is encountered.

The consultant concludes that these measures break the relevant source-pathway-receptor linkages and protect the identified receptors. The revised application therefore adopts a conservative groundwater-protection approach irrespective of the final confirmation of the precise Source Protection Zone mapping.

14.5 Localised intrusive works

The proposal does not involve wholesale redevelopment or a substantial new building. Intrusive works are localised and relate principally to the installation of drainage channels, the silt trap, the below-ground separator, drainage/service connections and foundations or anchorage for the lightweight canopies and acoustic barriers. These works will be

undertaken in accordance with the contaminated-land recommendations and watching-brief procedure so that any unexpected material is identified and managed appropriately.

14.6 Conclusion on Reason 3

The resubmission now provides the use-specific assessment, updated site context, clear no-infiltration design, controlled effluent route and construction safeguards requested by the Environment Agency. The information gap underlying Reason for Refusal 3 has therefore been addressed and the Environment Agency should be reconsulted on the complete revised technical package.

15. Drainage and Trade Effluent

15.1 Closed drainage strategy

For the avoidance of doubt, no vehicle wash water, trade effluent or operational runoff will be discharged to ground. The operational hardstanding will be impermeable and no soakaway or other infiltration system forms part of the proposal.

15.2 Treatment train

Water arising from vehicle washing and operational runoff will be collected by the proposed ACO drainage channels and routed through a dedicated car-wash silt trap. It will then pass through a three-stage vehicle wash separator before being conveyed to the existing foul drainage system through the existing on-site foul manhole.

The revised drainage drawing identifies the operational hardstanding as impermeable and confirms that no infiltration to ground forms part of the proposal. The drawing is therefore fully consistent with this strategy and with the August 2026 contaminated-land review, removing the ambiguity identified by the Environment Agency under the previous application.

15.3 Separate statutory approvals

Any trade effluent consent, discharge approval or associated operational licence required by the relevant sewerage undertaker or other statutory authority will be obtained separately before the car wash commences operation. These separate regimes provide additional control over the quality and quantity of discharge, alongside the physical treatment system secured through the planning application.

16. Biodiversity, Landscaping and Security

16.1 Biodiversity Net Gain

The previous officer report concluded that the proposed development appeared likely to fall within the statutory de minimis Biodiversity Net Gain exemption because it did not appear to affect priority habitat and the amount of habitat affected was below the relevant thresholds. The revised scheme remains concentrated on existing hardstanding and further reduces unnecessary ground disturbance.

16.2 Landscaping

The contained frontage planting provides a modest but meaningful visual improvement to Vale Road. Its containerised form is a deliberate response to the contaminated-land strategy, allowing greening without creating direct infiltration pathways through the underlying ground.

16.3 Security and site management

Bringing the parcel into managed commercial use will provide regular occupation and oversight of a currently vacant frontage. Existing and proposed boundary treatment will define the operational area and access can be controlled outside operating hours. Site security will be managed by the operator in accordance with normal business requirements and appropriate crime-prevention principles.

17. Proactive Engagement and Condition-Based Controls

17.1 Request for engagement before determination

This application is a resubmission following refusal of application 20260294. The applicant has incurred substantial additional professional and technical work in direct response to the matters identified by the Local Planning Authority, Environmental Protection and the Environment Agency. The scheme has been redesigned and is now accompanied by new specialist acoustic and contaminated-land evidence, revised drainage information and additional vehicle movement analysis.

Request to the Local Planning Authority

If the appointed Planning Officer, Environmental Protection Officer, Environment Agency or any other consultee considers that a residual matter requires clarification, the applicant respectfully requests that the Agent is contacted before determination and is given a reasonable opportunity to provide clarification or additional information where the matter is capable of resolution. The applicant remains willing to engage positively throughout the determination period.

17.2 Matters capable of control by condition

Without prejudice to the applicant's position that the development is acceptable as submitted, the applicant is willing to accept reasonable and necessary conditions securing the principal mitigation measures. Where a residual concern can properly be addressed through a clear planning condition, that route should be preferred to refusal of an otherwise acceptable development.

- Operating hours of 09:00-17:00;
- Installation and retention of the approved acoustic barriers;
- Additional acoustic treatment and closed operation of the compressor enclosure;
- Implementation and maintenance of the approved closed drainage system before first use;
- No infiltration or discharge of car-wash runoff to ground;
- Implementation of the contamination watching brief and unexpected-contamination procedure;
- Retention of frontage planting within contained planters; and
- Operation in accordance with the approved site layout and vehicle circulation arrangement.

18. Planning Balance and Conclusion

18.1 Matters already found acceptable

The previous decision is a material planning consideration. The Council accepted the principle of appropriate development within the urban boundary, found no conflict with Policy CS07, identified no harmful loss of outlook, privacy, sunlight or daylight and raised no highway objection. The resubmission therefore does not begin from a position where the use itself has been found unacceptable.

18.2 Reason 1 - design and character

The revised scheme responds materially to the previous design concern. Built form is reduced by omission of the drying canopy; the remaining canopies are lightweight and functional; the acoustic screen strategy combines solid and transparent elements; contained planting improves the Vale Road frontage; and the layout reads as a coherent, managed commercial facility rather than sporadic structures. The street-scene comparison demonstrates a more ordered frontage than the existing vacant fenced parcel.

18.3 Reason 2 - noise

A full site-specific acoustic assessment has now been submitted, including the BS4142 exercise expressly requested by the Council. The scheme has been redesigned in response to modelling. Predicted external levels are below the measured background at the nearest existing properties, internal levels are below the identified daytime guideline and

the conservative BS4142 rating level is only +0.5 dB above background. The consultant concludes that no significant adverse impact will occur.

18.4 Reason 3 - controlled waters

A new contaminated-land review has been prepared specifically for the car wash proposal. It updates the site context, reviews the existing intrusive evidence, identifies source-pathway-receptor relationships and sets out mitigation. The revised design uses impervious hardstanding, no infiltration to ground, a closed drainage system, contained planting and a construction watching brief. The wash-water treatment route is now clear and includes ACO drainage, silt removal, a three-stage separator and controlled foul connection.

18.5 Positive planning benefits

- Productive reuse of approximately 573 sq m of vacant and underutilised previously developed land;
- Substantial national policy weight under NPPF Policy L2 for better use of vacant and underutilised land and the controlled treatment of a historically contaminated site;
- Investment and employment associated with an experienced existing car wash operator;
- Use of an established access with no new highway opening;
- Improvement of a vacant street frontage through an ordered layout, screening and contained planting;
- Purpose-designed acoustic mitigation protecting neighbouring residents;
- Purpose-designed pollution prevention and wash-water treatment infrastructure; and
- An application package which directly addresses the detailed matters identified by the previous officer and statutory consultees.

18.6 Overall conclusion

The three previous refusal reasons were founded on design concerns and evidential deficiencies which were capable of being addressed through redesign and additional technical assessment. That work has now been undertaken. The proposal is acceptable in principle, makes efficient use of brownfield land, uses an established access, protects residential amenity through quantified acoustic mitigation and protects controlled waters through an impervious, closed drainage strategy.

The proposal accords with the Gravesham Local Plan Core Strategy when read as a whole and with the relevant national decision-making policies in the August 2026 National Planning Policy Framework. No adverse effect has been identified which would outweigh the material benefits of the development. Full planning permission should therefore be granted subject to appropriately worded conditions.

Appendix A - Response to Refusal Matrix

Refusal reason	Previous basis	Resubmission evidence / response	Conclusion
1. Character and appearance	Nature and appearance considered poorly integrated; officer described structures as sporadic and not visually attractive or locally distinctive.	Mixed commercial/residential context fully addressed; site history and commercial character explained; drying canopy removed; only two lightweight wash canopies retained; coherent frontage planting and boundary treatment; transparent acoustic screens; existing/proposed visuals.	Reason 1 overcome by materially revised design and fuller contextual evidence.
2. Noise and disturbance	Previous report not accepted as a noise impact assessment; no adequate receptor assessment; Environmental Protection requested full BS4142.	Martin Environmental Solutions Report 3302-1; on-site monitoring; existing houses modelled; 09:00-17:00 operation; compressor enclosure and extra insulation; acoustic barriers; external levels below background; conservative BS4142 +0.5 dB; no significant adverse impact.	Reason 2 overcome by the exact technical assessment requested by GBC.
3. Controlled waters	Old residential contamination reports; current context unclear; intrusive works unclear; conflicting drainage; permeable surface; runoff destination unclear.	Martin Environmental Solutions Report 3283-1 for the car wash end use; updated walkover; conceptual model; impervious hardstanding; no infiltration; contained planting; closed drainage; ACO, silt trap, three-stage separator and foul connection; watching brief.	Reason 3 overcome subject to statutory reconsultation on the complete revised pack.

Appendix B - Policy Compliance Matrix

Policy / consideration	Key test	Response / compliance
Core Strategy CS01	Sustainable development and efficient resource use.	Brownfield reuse; existing access and infrastructure; controlled drainage; productive commercial use.
Core Strategy CS02	Scale and distribution of development.	Previous officer accepted principle within urban boundary; small 573 sq m parcel within 9,881 sq m wider site.
Core Strategy CS07	Economy, employment and skills.	Previous officer found no conflict; proposal supports an established commercial operator and employment.
Core Strategy CS11	Safe and appropriate transport arrangements.	Existing access retained; no new highway opening; entry and exit swept-path drawings; on-site queue management.
Core Strategy CS18	Climate change / water quality / drainage considerations.	Impervious hardstanding; no infiltration of wash water; silt trap and three-stage separator; controlled foul connection; contaminated-land mitigation.
Core Strategy CS19	Visually attractive, fit for purpose, locally distinctive and integrated; protect amenity.	Reduced built form, lightweight canopies, coherent boundary and planting, clear acoustic screens, site-specific noise assessment and controlled operating hours.
Saved T1 / T5 / P3	Highway network, access and parking considerations.	KCC raised no substantive issue previously; existing access retained; swept-path evidence demonstrates workable circulation.
NPPF L2	Substantial weight to remediation and better use of vacant / underutilised land.	Vacant previously developed parcel returned to productive use; mitigation addresses historic contamination risk.
NPPF DP3	Respond to context and create well-designed, integrated places.	Design responds to mixed context, commercial history, street frontage, movement and visual permeability.
NPPF P2	Ground conditions and contamination must be assessed and mitigated.	Current car-wash-specific contaminated-land review by competent consultant; mitigation embedded in layout and drainage.
NPPF P3	Avoid/mitigate unacceptable noise and pollution; protect water and living conditions.	Quantified acoustic assessment and BS4142; restricted daytime hours; no significant adverse noise impact; closed wash-water drainage strategy.
Emerging Local Plan 2042	Efficient land use and brownfield regeneration.	Small brownfield parcel reused within existing urban area; emerging plan given appropriate, non-determinative weight.

Appendix C - Schedule of Commitments and Suggested Conditions

The following schedule is offered to demonstrate that the principal mitigation measures are clear, deliverable and capable of being secured through appropriately worded conditions where the Local Planning Authority considers this necessary. Final condition wording remains a matter for the decision maker.

Topic	Applicant commitment / suggested control
Approved plans	Development to be carried out in accordance with the approved location, site, drainage, swept-path and canopy drawings.
Operating hours	Car wash and valeting operations limited to 09:00-17:00.
Acoustic barriers	Approved solid and clear acoustic barriers to be installed before first use, continuous without material gaps, retained and maintained thereafter.
Compressor	Compressor to be housed in the acoustically treated enclosure assessed by Report 3302-1, with enclosure kept closed during operation.
Plant / equipment	Operation to remain consistent with the equipment and assumptions assessed in the Acoustic Survey and Assessment unless an alternative is demonstrated to be no noisier.
Drainage	ACO drainage, silt trap and three-stage separator to be installed and connected to the approved foul drainage route before first use and maintained thereafter.
No infiltration	No vehicle wash water, trade effluent or operational runoff to be discharged to ground; no soakaway or infiltration arrangement to be introduced.
Contamination watching brief	Watching brief to be maintained during intrusive works; unexpected contamination to trigger cessation in the affected area, investigation and appropriate remedial action.
Landscaping	Frontage planting to be retained in contained planters and maintained/replaced as necessary.
Vehicle management	Customer vehicles to be managed within the site and not deliberately queued on Vale Road.

Appendix D - Documents and References

- Gravesham Borough Council, Refusal Notice, planning application 20260294, dated 11 May 2026.
- Gravesham Borough Council, Delegated Officer Report, planning application 20260294.
- Gravesham Local Plan Core Strategy, adopted September 2014.
- Gravesham Local Plan First Review, saved policies, 1994.
- Gravesham Borough Council, Design for Gravesham - Design Code SPD, 2024.
- Gravesham Local Plan 2042, Proposed Submission / Regulation 19 version, 2026.
- Ministry of Housing, Communities and Local Government, National Planning Policy Framework, August 2026.
- Martin Environmental Solutions Ltd, Acoustic Survey and Assessment for Proposed Car Wash & Valeting Site at 2 Vale Road, Report No. 3302-1, August 2026.
- Martin Environmental Solutions Ltd, Contaminated Land Review for Proposed Car Wash & Valeting Site at Vale Road, Report No. 3283-1, August 2026.
- Brownfield Solutions Ltd, Desk Study Assessment Report, BM/C3476/6655, February 2017.
- Brownfield Solutions Ltd, Geo-Environmental Assessment Report, PD/C3476/8382 Rev A, June 2019.
- Lustre Consulting Ltd, Supplementary Phase 2 Site Investigation, 3869-210913-ML, November 2021 / subsequent revision.
- Design Solutions AP Ltd, drawing DS213-LP-01 - Location Plan.
- Design Solutions AP Ltd, drawing DS213-ESP-01 - Existing Site Plan.
- Design Solutions AP Ltd, drawing DS213-PSP-01A - Proposed Site Plan.
- Design Solutions AP Ltd, drawing DS213-PDP-01A - Proposed Drainage Plan, revised for impermeable hardstanding / no infiltration.
- Design Solutions AP Ltd, drawing DS213-SPA-01 - Swept Path Analysis, Vehicle Entering the Site.
- Design Solutions AP Ltd, drawing DS213-SPA-02 - Swept Path Analysis, Vehicle Exiting the Site.
- Design Solutions AP Ltd, drawing DS213-001 - Canopy plan and elevations.
- Existing and Proposed Street Scene Visuals submitted with the application.
- Car wash silt trap / wash-water treatment technical information submitted with the application.