



Delegated Report

Full Planning Application

Planning Application No:	20250596
Location:	Land At Dalefield Way (West Gravesend Kent DA12 2FL)
Description:	Use of the land for open storage of construction related equipment and operations related to Dalefield Way Industrial Park (B8 use) with associated installation of hardstanding/surface treatment.
Applicant:	OHalloran & OBrien
Site Visit Date:	15 July 2025

Submitted Documents/Plans

Application form
Drawing no. 00-0-00 (Existing Site Location Plan)
Drawing no. 0-3-00 Rev. P2 (Proposed Site Layout)
Biodiversity Assessment (July 2025)
BNG Metric Calculator
Grassland Habitat Type
Urban Habitat Type
Activity Noise Assessment (October 2025)
Air Quality Assessment (30 May 2025)
Design and Access Statement (June 2025)
Flood Risk Assessment Note and Preliminary Drainage Strategy (December 2025)
Phase 1 Geo-Environmental Desktop Study (May 2025)
Planning Statement (June 2025)
Preliminary Ecological Appraisal (ref. 1419)
Transport Statement (30 May 2025)

Superseded:

Drawing no. 0-3-00 (Proposed Site Layout)
~~Flood Risk Assessment Note and Preliminary Drainage Strategy (May 2024)~~

Relevant Planning History

Reference	Description	Decision	Decision Date
20170481	Application for a non-material amendment to planning application reference 20160314 to allow alterations to the external appearance.	Permitted	15.05.2017
20170712	Application for approval of conditions 6, 8 and 15 attached to planning permission reference no. 20160314 relating to details and samples of code and construction, external facing materials and roof materials and a mitigation strategy.	Approval of details	22.08.2017

20170082	Application for approval of condition 3 attached to planning permission reference no. 20160802 relating to a soft landscaping scheme.	Approval of details	30.03.2017
20170081	Application for approval of conditions 3(a)(b)(c), 4, 5, 7(a)(b)(c), 9, 10, 11, 12, 13, 18, 19 and 31 attached to planning permission reference no. 20160314 relating to details and samples of land raising, landscaping strategy SSSI and Ramsar ditch, flood resilient construction techniques, contaminated land assessment, surface finishes for roads, footpaths, cycle-ways and car parking areas, boundary enclosures, including screening by walls and fences, archaeological field evaluation, surface water drainage, restoration plan for the South Thames Estuary and Marshes SSSI, refuse storage, soft landscaping scheme and penetrative foundation methods.	Approval of details	18.08.2017
20160802	Erection of security fencing on the site boundary to prevent unauthorised access on the site.	Permitted	13.10.2016
20160665	Outline application for industrial development within Classes B2 and B8 of the Town and Country Planning (Use Classes) Order 1987.	Permitted	04.10.2016
20160314	Erection of 3 industrial units (Use Class B1/B2 and B8) with site access, related parking and circulation space.	Permitted	14.09.2016
20150873	Application for approval of Reserved Matters pursuant to outline planning permission reference no. 20100436 for industrial development within classes B2 and B8 relating to appearance, landscaping, layout and scale, including details of land raising, vehicle parking, refuse storage and flood resilient construction techniques.	Permitted	14.01.2016
20130222	Application for renewal of outline planning permission reference number 20070678 for industrial development within classes B2 and B8 of the Town and Country Planning (Use Classes) Order 1987.	Permitted	14.06.2013
20100969	Application for approval of reserved matters following outline planning permission reference number 20070678 for industrial development within classes B2 and B8 relating to the means of access, layout of site, scale, design and external appearance and landscaping scheme.	Permitted	29.07.2011
20100436	Outline application for the use of land for industrial purposes (Use Class B2/B8) comprising 7,000 sq. metres floor space together with associated extension of Dalefield Way, new site access with related parking and circulation space, landscaping scheme and associated flood accommodation works.	Permitted	30.08.2013
20070678	Outline application for industrial development within classes B2 and B8 of the Town and Country Planning (Use Classes) Order 1987.	Permitted	23.10.2007
20040582	Application for the variation of condition 2 of outline planning permission reference number GR/2000/433 relating to outline application for industrial development within Use Classes B2 and B8 of the Town and Country Planning (Use Classes) Order 1987, to allow an additional two years for the submission of reserved matters.	Permitted	13.08.2004
20000433	Outline application for industrial development within Use Classes B2 and B8 of the Town & Country Planning (Use Classes) Order 1987.	Permitted	22.06.2001

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
- CS11 – Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Design and Development Principle
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- TC7 – Other Archaeological Sites
- T1 – Impact of Development on Highway Network
- T5 – Access to the Identified 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 15 – Conserving and enhancing the natural environment
- Section 16 – Conserving and enhancing the historic environment

Supplementary Planning Guidance

- SPG 4 – KCC Parking Standards (2006)
- Design for Gravesham – Design Code (2024)
- Gravesham Landscape Character Assessment (2009)

Consultations, Publicity and Representations

External Consultees

Environment Agency 8 August 2025

We have no objection to the proposed development subject to the following planning conditions being included in any permission granted.

Please refer to the following sections for our full response:

- Section 1: Technical comments
- Section 2: Conditions and informatives

- Section 3: Advice to the Applicant / Local Planning Authority

Flood risk

We have no objection to the installation of hard standing / surface treatment at the site with regards to flood risk. The tidal flood risk affecting the site is very low and the construction will take place more than 8 metres away from the main river.

Other sources of flooding to the site such as surface water have been considered within the submitted Flood Risk Assessment. We recommend that the applicant refers to the Strategic Flood Risk Assessment (SFRA) for the borough and seeks advice from the Lead Local Flood Authority (LLFA) and emergency planning teams, where appropriate.

Groundwater and contaminated land

We consider that planning permission could be granted to the proposed development as submitted if planning conditions are included, as set out in Section 2 of this letter, to secure a remediation strategy in case of unsuspected contamination at the site and prevent the infiltration of surface water to the ground. Without these conditions, the proposed development on this site poses an unacceptable risk to the environment and we would object to the application in line with paragraph 187 of the National Planning Policy Framework (NPPF).

Section 2: Conditions and informatives

Note to the LPA: Condition wording

If you wish to amend the wording of our requested conditions or if you wish to merge them with other Local Planning Authority conditions, please contact us to discuss the revised wording.

Condition 1 (Unsuspected contamination)

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the LPA) shall be carried out until further investigation and a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the LPA. The remediation strategy shall be implemented as approved.

Reason: To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 187 of the NPPF.

Condition 2 (Infiltration of surface water into ground)

No drainage systems for the infiltration of surface water to the ground are permitted other than with the written consent of the LPA. Any proposals for such systems must be supported by an assessment of the risks to controlled waters. The development shall be carried out in accordance with the approved details.

Reason: To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants. This is in line with paragraph 187 of the NPPF.

Informative 1 (Surface water drainage)

Only clean uncontaminated water should drain to the surface water system. Roof drainage shall drain directly to the surface water system (entering after the pollution prevention measures). Appropriate pollution control methods (such as trapped gullies and interceptors) should be used for drainage from access roads and car parking areas to prevent hydrocarbons from entering the surface water system. There should be no discharge into land impacted by contamination or land previously identified as being contaminated. There should be no discharge to made ground. There must be no direct discharge to groundwater, a controlled water.

Informative 2 (Waste on-site)

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the environmental permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays. We recommend that developers should refer to the waste management page on GOV.UK.

We will consider any queries in relation to the use of Definition of Waste:

Development Industry Code of Practice (DoWCoP) (which is to be updated) through our environmental permitting enhanced pre-application advice service, considering site conditions, the materials that are proposed to be used, and the potential for harm to the environment and to human health. We can also provide advice as to whether an environmental permit is required.

Informative 3 (Waste to be taken off-site)

Contaminated soil that is (or must be) disposed of, is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of hazardous waste material produced or taken off site is 500kg or greater in any 12-month period, the developer will need to register with us as a hazardous waste producer. Refer to the hazardous waste pages on GOV.UK for more information.

Section 3: Advice to the Applicant / Local Planning Authority

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

Note to the Applicant

Planning advice service

Should you wish us to review any technical documents or want further advice to meet the requirements of the conditions recommended, we may do this as part of our charged for planning advice service.

Further engagement will provide you with certainty of our position as to what our response to your planning application will be. 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 24 November 2025

Thank you for consulting us on the above application which we received on 3 November 2025. As part of this consultation, we have reviewed the following documents:

- Application form, ref. PP-14096043, dated 13 June 2025
- Site location plan, ref. 25008-00-0-00, undated, by Darling Associates Architects
- Proposed site layout, ref. 25008- 0-3-00, undated, by Darling Associates Architects
- Preliminary Ecological Appraisal, ref. 1419, dated 20 May 2025, by ECO Assistance Ecologists
- Biodiversity Assessment, dated 2 July 2025, by ACJ Ecology
- Phase 1 Geo-Environmental Desktop Study, ref. 24054 rev 00, dated May 2025, by Manhire Associates
- Flood Risk Assessment Note and Preliminary Drainage Strategy, ref. 24054_WP01 rev02, dated October 2025, by Manhire Associates

Environment Agency position

We have no objection to the proposed development subject to the following planning conditions being included in any permission granted.

Please refer to the following sections for our full response:

- Section 1: Technical comments
- Section 2: Conditions and informatives
- Section 3: 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.

Section 1: Technical comments

Flood risk

We have no objection to the installation of hard standing / surface treatment at the site with regards to flood risk. The tidal flood risk affecting the site is very low and the construction will take place more than 8 metres

away from the main river.

Other sources of flooding to the site such as surface water have been considered within the submitted Flood Risk Assessment. We recommend that the applicant refers to the Strategic Flood Risk Assessment (SFRA) for the borough and seeks advice from the Lead Local Flood Authority (LLFA) and emergency planning teams, where appropriate.

Groundwater and contaminated land

The latest updated drainage document and drawings do cause some confusion as there appears to be typographical errors where diagrams should be saying 'impermeable' but instead say 'permeable'. Nevertheless, it appears the amended details result in a reduction in the permeable area overall. We are satisfied that our previous response and requested conditions suitably cover the issues in question and have no objections.

We consider that planning permission could be granted to the proposed development as submitted if planning conditions are included, as set out in Section 2 of this letter, to secure a remediation strategy in case of unsuspected contamination at the site and further details for any systems of infiltration of surface water to the ground. Without these conditions, the proposed development on this site poses an unacceptable risk to the environment and we would object to the application in line with paragraph 187 of the National Planning Policy Framework (NPPF).

Biodiversity and geomorphology

Development that encroaches on watercourses/ponds/wetlands can have a potentially severe impact on their ecological value. It is important to ensure (especially where hardstanding and polluted runoff is concerned) that an integrated buffer with sustainable urban drainage (SuDS) scheme is proposed. SuDS schemes will help attenuate and filter runoff before it enters the water course.

Networks of undeveloped buffer zones might also help wildlife adapt to climate change and will help restore watercourses to a more natural state as required by the river basin management plan.

More information is needed to establish buffer zones to the watercourse/ditch network. A minimum of 8m from top of bank should be observed.

The proposed development will therefore be acceptable if a planning condition is included requiring a scheme to be agreed to protect an 8-metre-wide buffer zone around the watercourse.

Biodiversity net gain is a requirement from the Local Authority and will also need to be addressed, either on site or off site, in order that the application is successful.

Section 2: Conditions and informatives

Note to the LPA: Condition wording

If you wish to amend the wording of our requested conditions or if you wish to merge them with other Local Planning Authority/statutory consultees' conditions, please contact us to discuss the revised wording.

Condition 1 (Unsuspected contamination)

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the LPA) shall be carried out until further investigation and a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the LPA. The remediation strategy shall be implemented as approved.

Reason: To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 187 of the NPPF.

Condition 2 (Infiltration of surface water into ground)

No drainage systems for the infiltration of surface water to the ground are permitted other than with the written consent of the LPA. Any proposals for such systems must be supported by an assessment of the risks to controlled waters. The development shall be carried out in accordance with the approved details.

Reason: To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants. This is in line with paragraph 187 of the NPPF.

Condition 3 (Undeveloped buffer zone)

No development shall take place until a scheme for the provision and management of an 8-metre-wide buffer zone alongside the watercourse/pond/wetland has been submitted to, and approved in writing by, the local planning authority. Thereafter, the development shall be carried out in accordance with the approved scheme. Any subsequent variations shall be agreed in writing by the local planning authority, in which case the development shall be carried out in accordance with the amended scheme. The buffer zone scheme shall be free from built development including lighting, domestic gardens and formal landscaping. The scheme shall include:

- plans showing the extent and layout of the buffer zone
- details of any proposed planting scheme (for example, native species)
- details demonstrating how the buffer zone will be protected during development and managed over the longer term including adequate financial provision and named body responsible for management plus production of detailed management plan
- details of any proposed footpaths, fencing, lighting, etc

Reason: Land alongside watercourses is particularly valuable for wildlife and it is essential this is protected. This approach is supported by paragraphs 180 and 186 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused. This condition is also supported by legislation set out in the Natural Environment and Rural Communities Act 2006 and Article 10 of the Habitats Directive which stresses the importance of natural networks of linked corridors to allow movement of species between suitable habitats, and promote the expansion of biodiversity. In addition the site is located near a SSSI and the applicant will need to liaise with Natural England to gain an assent for the works. The Assent will determine whether the proposal is ecologically acceptable to the features within the designation.

Informative 1 (Surface water drainage)

Only clean uncontaminated water should drain to the surface water system. Roof drainage shall drain directly to the surface water system (entering after the pollution prevention measures). Appropriate pollution control methods (such as trapped gullies and interceptors) should be used for drainage from access roads and car parking areas to prevent hydrocarbons from entering the surface water system. There should be no discharge into land impacted by contamination or land previously identified as being contaminated. There should be no discharge to made ground. There must be no direct discharge to groundwater, a controlled water.

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Section 3: Advice to the Applicant / Local Planning Authority

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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

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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

Biodiversity net gain (rivers metric)

The Environment Act 2021 introduced a requirement for mandatory Biodiversity Net Gain (BNG) on most types of Town and Country Planning Act (TCPA) development. Biodiversity net gain offers an opportunity to

promote and achieve our desired environmental outcomes – nature recovery, natural flood management, nature-based solutions and green and blue infrastructure.

Please note, for this application we have not reviewed any submitted BNG information in detail and our position on this application does not mean the biodiversity gain objective has been met. In line with the “Biodiversity Net Gain” section of the Planning Practice Guidance, it is the role of the Local Planning Authority role to decide if the BNG requirement for development in scope has been met.

Applications subject to statutory BNG require completion of the Watercourse Unit Module by a competent person if:

- a watercourse is onsite,
- the watercourse bank top is within 10m of the redline boundary (i.e. the red line boundary intersects the riparian zone).
- For ditches, the Watercourse Unit Module is applied where the bank top is located within 5m of the red line boundary.
- a culvert lies within the red line boundary.

We recommend that you refer to the following to assist your assessment of the watercourse metric: Watercourse Metric (within the Biodiversity Metric) - checklist to aid the reviewer.pdf (local.gov.uk)

Further information, data and advice on our rivers and catchments can be found using the England | Catchment Data Explorer and River Basin Management Plans.

Note to the Applicant Planning advice service

Should you wish us to review any technical documents or want further advice to meet the requirements of the conditions recommended, we may do this as part of our charged for planning advice service.

Further engagement will provide you with certainty of our position as to what our response to your planning application will be. 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](#).

North Kent Marshes Internal Drainage Board

The site is within the drainage district of the North Kent Marshes Internal Drainage Board (NKMIDB); should the local planning authority consider the tidal flood risk as a result of overtopping and breach be appropriate for the vulnerability and lifetime of the development, then the Board would like to make the following comments.

From the FRA and Drainage Strategy, it states, "Proposals are to construct 2969m² of asphalt surfacing and associated drainage that will connect into the overall SuDS system already constructed and provide 9576m² of permeable hardstanding for storage." It is a little unclear whether the asphalt is permeable or impermeable. The Board assumes the area is impermeable because there is mention that runoff from the new asphalt areas will connect into the existing drainage ditches currently installed and discharge into the flood levee corridors. We understand this system allows runoff to freely discharge into the receiving open channel watercourses, with flows controlled downstream to approved Greenfield rates by existing devices previously installed north of the application site (adjacent to the railway line). We also understand that sufficient on-line attenuation shall be provided. As such, the Board is satisfied that the current proposals align with the previously approved strategic drainage limits and SuDS principles.

However, the Applicant should be aware that the proposed additional surface water discharge will require land drainage consent in line with the Board's Byelaws (specifically Byelaw 3). Any consent granted will

likely be conditional, pending the payment of a Surface Water Development Contribution fee, calculated in line with the Board's charging policy (available at

https://lowermedwayidb.co.uk/wp-content/uploads/2024/04/WMA_Table_of_Charges_and_Fees-April_2024.pdf

The one-off Surface Water Development Contribution is due to the Board to cover the increased flow and volume in its maintained drainage network. The Applicant is advised to contact the Board with a finalised scheme, including any new outfall headwall details. For information, the Board is currently reviewing its charging policy and is likely to be amending it in the coming months.

It would be prudent to apply a planning condition to ensure a full detailed scheme for surface water disposal, clearly showing how the new and existing systems link together, is submitted to and approved by the local planning authority.

This response is based on the information provided with the planning application and is reliant on its accuracy. The Board would be very grateful if its comments were used in their entirety.

KCC Biodiversity

We have reviewed the submitted information and are satisfied that sufficient information has been submitted to determine the planning application.

Protected/Notable Species

We advise that we are satisfied that the conclusions of the ecological reports is valid.

The site has some limited areas of vegetation which have the potential to support reptiles, breeding birds and foraging/commuting bats. However the areas of vegetation are limited we are satisfied that further surveys are not required and instead the impact can be avoided with the submission of a precautionary mitigation strategy.

We recommend the following wording:

No development shall be undertaken (including any ground works, site and/or vegetation clearance) until a construction ecological management plan (CEMP) which contains full details of the ecological mitigation has been submitted to and approved in writing by the local planning authority. The CEMP shall be based on up-to-date ecological survey information, as advised by a suitably qualified ecologist and include the following:

- Measures to avoid impacts to the retained habitats including identification of a construction exclusion zone (and the use of protective fences, exclusion barriers and warning signs);
- Extent and location of proposed construction and mitigation works, shown on appropriate scale maps and plans;
- Specific measures (which may be presented as a series of method statements) to avoid impacts to protected/notable species and a timetable for implementation of the measures;
- Persons responsible for implementing the measures, including times during construction when specialist ecologists need to be present on-site;
- The role and responsibilities of an Ecological Clerk of Works (ECoW) or similarly competent person(s);
- Contingency plans should a protected species be encountered;

The approved CEMP shall be adhered to and implemented throughout the construction period in accordance with the approved details.

Biodiversity Net Gain

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications⁵⁸ for development (unless exempt^{59,60},) must deliver at least a 10% biodiversity net gain (BNG), shown via use of the Statutory Biodiversity Metric prior to commencement of any development. Having reviewed submitted information⁶¹, we consider a 10% biodiversity net gain is a statutory requirement of this proposed development.

Any application which is required to achieve a 10% BNG must submit the following information as a minimum¹:

- confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition;
- the pre-development biodiversity value(s), either on the date of application or earlier proposed date (as appropriate);
- where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date;
- the completed metric calculation tool showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value;

¹ <https://www.gov.uk/guidance/biodiversity-net-gain#para11>

- a statement whether activities have been carried out prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value ('degradation'), and where they have:
- a statement to the effect that these activities have been carried out;
- the date immediately before these activities were carried out;
- the pre-development biodiversity value of the onsite habitat on this date;
- the completed metric calculation tool showing the calculations, and
- any available supporting evidence of this;
- a description of any irreplaceable habitat (as set out in column 1 of the Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) on the land to which the application relates, that exists on the date of application, (or an earlier date); and
- plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).

The ecologist carrying out the BNG assessment was given the wrong redline boundary and they have only assessed the area which is to be converted in to the hard standing area. It has not included the vegetated buffer around the site of the boundary. However from reviewing the site plan we understand that the vegetated buffer between the site and the ditch will be retained therefore we accept that baseline does not need to be updated as part of the application.

We note that the baseline information differs slightly between the BNG assessment and the Preliminary Ecological Appraisal. However we agree with the BNG assessment that the site does not meet the criteria for the priority habitat Open Mosaic Habitat on Previously Developed Land.

We are satisfied that an updated BNG metric is not required prior to determination however the correct baseline information covering the whole of the redline boundary will have to be included within the metric submitted as part of the biodiversity gain plan.

The submitted information has detailed that a BNG loss of 100% for habitats will occur due to the loss of all habitat on site and it has detailed that 0.94 units will be required to achieve a BNG of over 10%. We advise that the number of units required to achieve a BNG of over 10% is likely to be higher as the baseline value will be higher once the vegetated boundary between the ditch and the fencing is included.

Off site habitat creation will be required to achieve a BNG either through habitat creation within the applicants landholdings (if there is any) or the purchasing of off site units Further details of off site habitat creation can be found at the end of the report. We advise that it will be possible to purchase off site units to achieve a BNG as part of this proposal and we direct the applicant towards the Kent Biodiversity Net Gain Site Register for off site habitat providers in Kent Kent Biodiversity Net Gain Site Register | Making Space For Nature Kent.

We advise that details of the off site habitat creation are not required prior to determination however we advise that how the offsite habitat creation will be implemented must be agreed and registered on the biodiversity gain site register prior to the submission of the biodiversity gain plan (if granted). Search the biodiversity gain sites register - GOV.UK

The development, if permitted, will be subject to the deemed condition of planning permission relating to biodiversity gain as per Schedule 7A 13(1) of the Town and Country Planning Act 1990. The condition is that the development may not be begun unless—

- (a) a biodiversity gain plan has been submitted to the planning authority, and
- (b) the planning authority has approved the plan.

The condition cannot be varied or removed. An application must be made to discharge it as any other condition. We recommend it is referred to in decision notices in the form of an informative. The government's published Biodiversity Gain Plan (BGP) template should be used to discharge it: Biodiversity gain plan - GOV.UK. Please note that the submission of the finalised Statutory Biodiversity Metric/BGP is required by law prior to the commencement of any development.

We advise that as no habitat creation or enhancement is proposed it doesn't meet the requirements of on site significant habitat and therefore the site does not require monitoring reports to be submitted to the LPA.

Designated Sites

The site is within 500m of the South Thames Estuary and Marshes SSSI and as the site is largely compacted ground and is adjacent to an existing industrial estate we are satisfied that the proposal is unlikely to have a significant impact on the designated site due to loss of habitat or impacts from noise.

The site is within 10m of a ditch which is connected to the SSSI and we advise that the LPA must be satisfied that any drainage has been designed to ensure that any water run off will not negatively impact the SSSI.

The proposal may result in an increase in lighting if any is proposed. We advise that if any lighting is required the lighting condition must include the following requirement:

- Be designed following best practice guidance within Bat Conservation Trust/Institute of Lighting Professional's 'Guidance Note 08/23 Bats and Artificial Lighting at Night'2
- Site plan showing the location and types of lighting
- Lighting to be operational only when required.

KCC Flood and Water Management (7 August 2025)

We have several key points relating to this drainage strategy, which we would request are addressed:

The surface water management strategy proposes to connect into the existing drainage regime, implemented as part of the previous industrial development within the blue line boundary. The existing drainage network comprises a number of open channels which inter-connect with a wider network of watercourse drains and flood levee corridors, ultimately discharging to the north into the "Shorne and Higham Marshes" watercourse via culverts beneath the railway line and disused canal.

The drainage proposals comprise of multiple systems; online attenuation is provided through flood levees, offering a storage volume of 1,905m³. Surface water from roads will pass through full retention fuel/oil separators prior to discharge into the watercourse drains.

While we thank the applicant for providing such a detailed history of the previous applications, we kindly request that future submissions include a report that clearly outlines the current surface water drainage proposal in a more focused document with a 'draw down' table of previously approved areas and subsequent discharge rates to demonstrate that capacity still exists within the wider network and that this additional rate can be accommodated. This helps to ensure clarity and efficiency in our review process.

1. As part of the submission, we request that modelling and drainage drawing is provided demonstrating the drainage system for the site as a whole (to include the new proposed areas and the existing). This is necessary to confirm that the new system does not adversely affect performance of the existing drainage and to determine the impact of the additional catchment.

2. We advise that the Environment Agency be consulted regarding the safety of development, particularly in light of findings that tidal flood defences around Gravesend were at a lower level than previously expected. While it is noted that the EA previously did not object to the proposal in 2016, given the time that elapsed and changes in planning standards we suggest further consultation.

3. As the outfall of this wider network is located outside the red line boundary and discharges into the adjacent watercourse named "Shorne and Higham Marshes" via culverts, we require confirmation of sufficient capacity of the receiving network for these proposals. That said this site location falls under the remit of the North Kent Marsh Internal Drainage Board (set up in August 2016). They will also need to be contacted regarding connection into the ditch network and subsequent outfall into ordinary watercourse.

4. For the offsite connection to be made confirmation of ownership or 3rd party land consent will be required to install drainage through the adjacent land. This is essential to ensure a drainage outfall can be secured.

5. We note that a drainage drawing (dated May 2025) has been included in Appendix G. Please provide a key to confirm the features shown. Additionally, a detailed drainage drawing for the full drainage network that this site will connect into is required.

6. We note that an impermeable area plan has been included within Phase 3A Flood Risk Assessment - January 2007 in Appendix D (drawing reference B140-019). Please confirm whether this layout and impermeable areas remains unchanged. Please supply an updated impermeable area plan if necessary. An impermeable areas plan should be provided to assist in reviewing the calculations.

We require updated hydraulic calculations to be supplied:

7. As part of the hydraulic calculations, we note that the seasonal default Cv values have been used. Given the drained area is impermeable we require this to be set at 1. We would seek for this to be updated and be provided moving forward.

8. As of the 10th of May 2022, the Environment Agency's climate change allowances have been updated. As part of this update, revisions have been made to the 'Peak Rainfall Intensity Allowances' that are used in applying climate change percentages to new drainage schemes.

The LLFA would now seek the 'upper end' allowance is designed for both the 30 (3.3%) and 100 (1%) year storm scenarios. The latest information on the allowances and map can be found at the following link:
<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

This analysis must determine if the impacts of the greater allowance are significant and exacerbate any flood risk. The design may need to be minimally modified but may also need additional mitigation allowances, for example attenuation features or provision of exceedance routes. This will tie into existing designing for exceedance principles.

9. Please confirm the area used in the calculations. The area used in the greenfield calculations should be consistent with that used in the hydraulic modelling.

10. We request greenfield runoff calculations to be supplied. We cannot accept proposed discharge rate until further details about the overall network are supplied.

KCC Flood and Water Management (25 November 2025)

Kent County Council as Lead Local Flood Authority have reviewed the Flood Risk Assessment Note & Preliminary Drainage Strategy prepared by Manhire Associates Consulting Engineers (dated October 2025) and have the following comments:

It is proposed to manage surface water via a combination of permeable paving, a high-capacity channel drain and an oil separator to manage pollution with a HydroBrake to restrict discharge rate 8.75l/s into an existing network of watercourse drains and flood levee corridors at the East of the site.

We would recommend a holding objection until the below points have been addressed:

1. As set out in the National Standards for SuDS, the peak allowable discharge rate from the development to surface waters for the 50% AEP event shall be limited to the equivalent 50% AEP greenfield runoff rate, or 3 l/s/ha, whichever is the greater.
2. As the development has a 50-year lifespan (up to 2075), the 2070 epoch should be applied, and the upper-end allowance used for both the 3.3% and 1% events, in line with Environment Agency's guidance. The design should then be adjusted accordingly to accommodate the additional volumes.
3. We request that CV values be set to 1 for both summer and winter scenarios.
4. We expect developments to apply the Simple Index Approach (SIA) as set out in Chapter 26 of the CIRIA SuDS Manual (C753) to demonstrate that adequate pollution control measures are incorporated in line with national SuDS standards. The SIA assigns pollution hazard indices to different land uses and compares them against the mitigation indices provided by selected SuDS components for sediment, metals, and hydrocarbons.
5. In line with Standard 2 of Defra's Technical Standards for SuDS, the drainage design should apply a 'SuDS approach' to capture and retain the first 5mm of rainfall through interception.

KCC Flood and Water Management (7 January 2026)

Kent County Council as Lead Local Flood Authority have reviewed the revised Flood Risk Assessment prepared by Manhire Associates and have the following comments:

The site covers approximately 1.25 hectares and will comprise two main surface types: 10,923 m² of existing permeable hardstanding, which will be retained and regraded, and 1,615 m² of new permeable tarmac surfacing. The retained permeable area will continue to allow infiltration as it does currently, while the new tarmac area will be positively drained and constructed using a permeable system.

The proposed drainage system discharges to adjacent surface water ditches. Runoff from the new permeable tarmac will be attenuated within a 400 mm thick granular sub-base. Discharge from the site will be restricted to 3.75 litres per second, using a Hydrobrake® flow control device.

The permeable construction consists of open-graded tarmac surfacing over a crushed stone sub-base, with geotextile layers. Additional pollution control measures include a full retention fuel/oil separator and a petrol interceptor at the outfall. While the LLFA raise no objections to this approach, we note that full details of the construction/ design are yet to be produced to cover the permeable surfacing and as such we would request for a detailed design condition to be attached. The wording of this along with our verification report condition can be found below:

Condition:

Prior to the addition of the final surfacing, a detailed sustainable surface water drainage scheme for the site shall be submitted to (and approved in writing by) the local planning authority. The detailed drainage scheme shall be based upon the design principles detailed within the Flood Risk Assessment (24054_WP01- Revision 3). The submitted scheme shall demonstrate compliance with the required technical standards at the time of submission and shall demonstrate that the surface water generated by this development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm) can be accommodated and disposed of without increase to flood risk on or off-site.

The drainage scheme shall also demonstrate (with reference to published guidance):

- that silt and pollutants resulting from the site use can be adequately managed to ensure there is no pollution risk to receiving waters.
- appropriate operational, maintenance and access requirements for each drainage feature or SuDS component are adequately considered, including any proposed arrangements for future adoption by any public body or statutory undertaker.

The drainage scheme shall be implemented in accordance with the approved details.

Reason:

To ensure the development is served by satisfactory arrangements for the disposal of surface water and to ensure that the development does not exacerbate the risk of on/off site flooding. These details and accompanying calculations are required prior to the commencement of the development as they form an intrinsic part of the proposal, the approval of which cannot be disaggregated from the carrying out of the rest of the development.

Condition:

No building on any phase (or within an agreed implementation schedule) of the development hereby permitted shall be occupied until a Verification Report, pertaining to the surface water drainage system and prepared by a suitably competent person, has been submitted to and approved by the Local Planning Authority. The Report shall demonstrate that the drainage system constructed is consistent with that which was approved. The Report shall contain information and evidence (including photographs) of details and locations of inlets, outlets and control structures; landscape plans; full as built drawings; information pertinent to the installation of those items identified on the critical drainage assets drawing; and, the submission of an operation and maintenance manual for the sustainable drainage scheme as constructed.

Reason:

To ensure that flood risks from development to the future users of the land and neighbouring land are minimised, together with those risks to controlled waters, property and ecological systems, and to ensure that the development as constructed is compliant with and subsequently maintained pursuant to the requirements of paragraph 182 of the National Planning Policy Framework.

KCC Heritage

The site lies within an area of multi-period archaeological potential related to this former wetland edge environment. However, based on existing Historic Environment Record data for the area, the past development of the site, and the limited groundworks associated with this development, 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.

KCC Highways

This application is for temporary materials and vehicle storage within the overall Dalefield Way site. There are no staff implication and very low impact on the local highway network.

I therefore raise no objection to this application.

It is important to note that Local Planning Authority (LPA) permission does not convey any approval to carry out works on or affecting the public highway.

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be a given because LPA planning permission has been granted.

For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture or landscape assets such as grass, shrubs and trees, is advised to engage with KCC

Highways and Transportation at an early stage in the design process.

Across the county there are pieces of land next to private homes and gardens and near the highway that do not look like roads or pavements but are actually part of the public highway.

Some of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil.

Works on private land may also affect the public highway. These include works to cellars, to retaining walls which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a pre-application advice service in addition to a full formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. Further details are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>

This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process. Further details on this are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/apply-for-a-dropped-kerb/dropped-kerb-contractor-information>

Once planning approval for any development has been granted by the LPA, it is the responsibility of the applicant to ensure that before development commences, all necessary highway approvals and consents have been obtained, and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority.

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Further guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>

Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181.

Kent Police

We have reviewed this application in regard to Crime Prevention Through Environmental Design (CPTED) and in accordance with the National Planning Policy Framework (NPPF).

Applicants/agents should consult us as Designing out Crime Officers (DOCO's) to address CPTED and incorporate Secured By Design (SBD) as appropriate. We use details of the site, relevant crime levels/type and intelligence information to help design out the opportunity for Crime, Fear of Crime, Anti-Social Behaviour (ASB), Nuisance and Conflict.

There is a carbon cost for crime and new developments give an opportunity to address it. Using CPTED along with attaining an SBD award using SBD guidance, policies and academic research would be evidence of the applicants' efforts to design out the opportunity for crime.

We recommend SBD guidance is utilised to address designing out crime to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998. The points below identify my recommendations for the layout and design of this scheme.

1. We recommend boundary treatments be a minimum of 2m and the installation of lockable gates to the sides of the unit to provide controlled access to the rear. These gates must be flush to the building line to optimize surveillance.
2. We recommend natural surveillance for parking areas. As a secondary layer of security, we would also recommend CCTV be installed to further monitor use. We also strongly recommend gating access roads/ parking areas to prevent nuisance parking and misuse out of hours.
3. Defined pedestrian routes to/ from the building are recommended to improve safety and avoid pedestrian and vehicle conflict.
4. Cycle storage must be well lit and with natural surveillance. We recommend the sold secure or SBD recommended products for additional security.
5. Lighting - Please note, whilst we are not qualified lighting engineers, any lighting plan should be approved by a professional lighting engineer (e.g., a Member of the ILP), particularly where a lighting condition is imposed, to help avoid conflict and light pollution. we recommend that a suitable lighting policy is installed to ensure that the units and staff have safe access to and from the units and to help deflect criminality. External lighting to conform to min standard of BS5489-1:2020.
6. CCTV to be installed, especially in areas with limited natural surveillance such as rear of the units, utility areas/ bin stores and on the access/ exit road. We also recommend cameras in the following areas to keep users safe and monitor their movements; any stairs, emergency access doors, lifts, loading/ unloading areas, car park and reception, main office/ safe. The CCTV must not infringe any lighting plan.
7. We strongly recommend alarms, with an auto-dial function, be installed on all external doors, including emergency exits.
8. All external doorsets (a doorset is the door, fabrication, hinges, frame, installation, and locks) including folding or sliding to meet PAS 24: 2022 UKAS certified standard, STS 201 or LPS 2081 Security Rating B+. Please Note, PAS 24: 2012 tested for ADQ (Building Regs) has been superseded and is not suitable for this development.
9. Windows on the ground floor to meet PAS 24: 2022 UKAS certified standard, STS 204 Issue 6:2016, LPS 1175 Issue 8:2018 Security Rating 1/A1, STS 202 Issue 7:2016 Burglary Rating 1 or LPS 2081 Issue 1.1:2016 Security Rating A. Glazing to be laminated. Toughened glass alone is not suitable for security purposes. Any curtain walling and fixings should be tested and meet BS EN 1627:2011 and/or be certified to LPS 1175: Issue 7, SR1 or STS 202: Issue 3, BR1.
10. Any Shutters should be as close to the building line as possible and must avoid the creation of a recess. Shutters must be certificated to LPS 1175: Issue 7, SR2; STS 202: Issue 3, BR2; Sold Secure Gold or PAS 68:2013
11. Bin Stores must be secure, lit and, if in an area with limited natural surveillance we recommend CCTV cameras be installed. We also strongly advise against placing this store close enough to the building that it can be used as a climbing aid into the building when closed.
12. If any buildings are to have roof access for maintenance of solar panels and lift shafts etc., we recommend that ladders/ access doors to these areas are securely locked so that members of the public are unable to access this area. We also require CCTV to cover this area in order to monitor unauthorized access.
13. New trees should help protect and enhance security without reducing the opportunity for surveillance or the effectiveness of lighting. Tall slender trees with a crown of above 2m rather than low crowned species are more suitable than "round shaped" trees with a low crown. New trees should not be planted within parking areas or too close to street lighting. Any hedges should be no higher than 1m, so that they do not obscure vulnerable areas.
14. The Access Control, Doorsets and Windows should also meet SBD Commercial 2015 advised standards. Any public access to commercial units should be restricted to one main public/visitor entrance into the building. Reception, Audio/Visual systems linking to the reception or personnel managing access control is essential for businesses that could attract crime risk (we can advise). For doorsets, we recommend minimum standards of PAS 24:2022, LPS 1175: Issue 7, SR2, STS 201 or STS 202: Issue 3, BR2. Units may require additional strengthening for some uses.

If approved, site security is required for the construction phase. There is a duty for the principle contractor “to take reasonable steps to prevent access by unauthorised persons to the construction site” under the Construction (Design and Management) Regulations 2007. The site security should incorporate plant, machinery, supplies, tools and other vehicles and be site specific to geography and site requirements.

We welcome a discussion with the applicant/agent about site specific designing out crime. If the points above are not addressed, they can affect the development and local policing.

This information is provided by Kent Police DOCO's and refers to situational crime prevention. This advice focuses on CPTED and Community Safety with regard to this specific planning application.

Internal Consultees

GBC Environmental Protection 7 August 2025

The following comments are made:

Contaminated Land

The submitted Phase 1 Desk Top Study has been reviewed. The report recommends a Phase II intrusive assessment of both soil and groundwater. This can be addressed by way of the following condition:

No development approved by this permission shall be commenced prior to a contaminated land assessment (in accordance with the Environment Agency's Land Contamination Risk Management (LCRM) guidance) and if necessary an associated remedial strategy, together with a timetable of works, being submitted to the Local Planning Authority for approval.

- a) A site investigation, based on the findings of the submitted 'Phase 1 Geo Environmental Desktop Study' by Manhire Associated dated May 2025 (Report Ref: 24054 Rev00) shall be carried out by a suitably qualified and accredited consultant/contractor in accordance with a Quality Assured sampling and analysis methodology.
- b) A site investigation report detailing all investigative works and sampling on site, together with the results of analysis, risk assessment to any receptors and a proposed remediation strategy shall be submitted to the Local Planning Authority. The Local Planning Authority shall approve such remedial works as required prior to any remediation commencing on site. The works shall be of such a nature so as to render harmless the identified contamination given the proposed end-use of the site and surrounding environment including any controlled waters.
- c) Approved remediation works shall be carried out in full on site under a quality assurance scheme to demonstrate compliance with the proposed methodology and best practice guidance). If during any works contamination is encountered which has not previously been identified then the additional contamination shall be fully assessed and an appropriate remediation scheme agreed with the Local Planning Authority.
- d) Upon completion of the works, this condition shall not be discharged until a closure report has been submitted to and approved by the Local Planning Authority. The closure report shall include details of the proposed remediation works and the quality assurance certificates to show that the works have been carried out in full in accordance with the approved methodology. Details of any post remediation sampling and analysis to show the site has reached the required clean-up criteria shall be included in the closure report together with the necessary documentation detailing what waste materials have been removed from the site.
- e) Where applicable, a monitoring and maintenance scheme to include monitoring the long-term effectiveness of the proposed remediation over an agreed period of time, and the provision of reports on the same, must be prepared and approved in writing by the local planning authority.

Following completion of the measures identified in that scheme, and when the remediation objectives have been achieved, reports that demonstrate the effectiveness of the monitoring and maintenance carried out must be produced and submitted to the local planning authority.

Air Quality

The air quality assessment looks at both construction and operational impacts and has followed appropriate guidance. For the construction phase, with the implementation of the dust mitigation measures given in Appendix D, the impact will be 'not significant'. which can be included in the CEMP.

Operational impact is not considered to be an issue as it's been advised that there will not be a change in traffic levels to the site as the storage space will be used by vehicles currently using existing storage area on the wider site area.

Noise Control

I can't see any information regarding hours of use of the storage area? Whilst it's appreciated that the site will be used for storage currently taking place elsewhere on the wider site, this is a new use to the houses nearby so there may be an impact in terms of noise as this area has previously been unused/vacant. Can hours be clarified with the applicant/agent please

Although the submitted information infers that this is the rear of the housing development and is mainly brick built areas, this is not the case. There are a significant number of windows overlooking the road and the site including some balcony/external amenity areas. We need to ensure that the proposal will not result in a detrimental impact in terms of noise. In this respect, a noise impact assessment is required and this should look at noise from vehicles as they come and go from site and move about on site, noise of material being unloaded/loaded or moved about, use of any plant/equipment such as forklifts, diggers, dumpers, telehandlers etc, reversing beepers and so forth. Ideally this needs to be submitted pre-determination in case any mitigation measures or changes to hours are needed.

There are no buildings planned for the site, so it does not seem that any plant or equipment is to be installed (A/C, ASHP. condensers, extract fans etc). However, if this is not the case, the rating noise from any fixed building services/mechanical plant/equipment associated with the development shall be at least 10dB below the existing LA90 background level at the nearest noise sensitive receptors (i.e. dwellings) when measured and assessed in accordance with BS4142:2014.

Code of Practice on Construction and Demolition

Due to the proximity of the residential dwelling opposite the proposal site a full and detailed Construction Environmental Management Plan (CEMP) will be required. This must include a Dust Management Plan in accordance with the details in Appendix D of the Air Quality Assessment.

Lighting

Artificial lighting can cause a statutory nuisance under the Environmental Protection Act 1990. It is important that the applicants are not permitted to install external lighting that illuminate anything other than the ground within the curtilage of the proposed buildings in order to assist in preventing a nuisance from occurring (which would be most likely if the bedrooms on neighbouring properties are illuminated). Any lighting to be installed must not extend beyond the boundary of the site. It is advised that a condition be imposed on any permission requiring external lighting details to be submitted for approval prior to installation. The details must include a lux contour plan extended over a map of the area so that the lux levels at the nearby houses can be checked.

GBC Environmental Protection 30 October 2025

Further to the response dated 7th August an 'Activity Noise Assessment' dated October 2025 by Syntegra Consulting (Report Ref: 25-15909) has now been submitted. Appropriate background noise levels have been taken over a 4 day period albeit some of the measurement discarded due to severe/windy weather.

The hours of use in the report are cited as being 08:00 to 18:00, although it does not specify what days of

the week this relates to. Noise from the HGV's and telehandlers has assessed. Based on the BS4142 assessment noise levels at the nearest dwellings are predicted to be 3dB above the background noise levels. The report cites that the local authority requirement is for noise levels to be equal to the existing background levels. This is not the criteria we work to which is that the rating noise from any new plant/equipment shall be at least 10dB below the existing LA90 background level at the nearest noise sensitive receptors (i.e. dwellings) when measured and assessed in accordance with BS4142:2014.

However, it is agreed that the BS4142 assessment is based on a worst-case scenario of an HGV engine running and 2 telehandlers operating continuously for an hour, which is unlikely. Use is likely to be for shorter periods of time and more intermittently. In addition, due to the existing ambient noise levels during the day, it's unlikely that the noise from the site will be particularly evident/audible at the houses.

There is no mention of any fencing around the site as far as I can see. It may be beneficial to erect an acoustic fence along the Dalefield Way façade of the site in order to minimise the potential for any noise or noise complaints. Fencing of a minimum mass of 10kg/m2 is advised.

In addition, use of the site should be restricted by condition to the following hours

Monday to Friday 08:00 to 18:00

Saturday 08:00 to 13:00

No access/operation on Sunday or Bank Holiday.

Neighbouring properties

The application has been advertised by individual neighbour letters to 58 properties. The overall consultation period expired on 29 July 2025.

One letter of representation has been received from a neighbouring property. This raises concerns regarding problems for all the neighbouring houses / flats, including noise issues.

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

Officer's Analysis

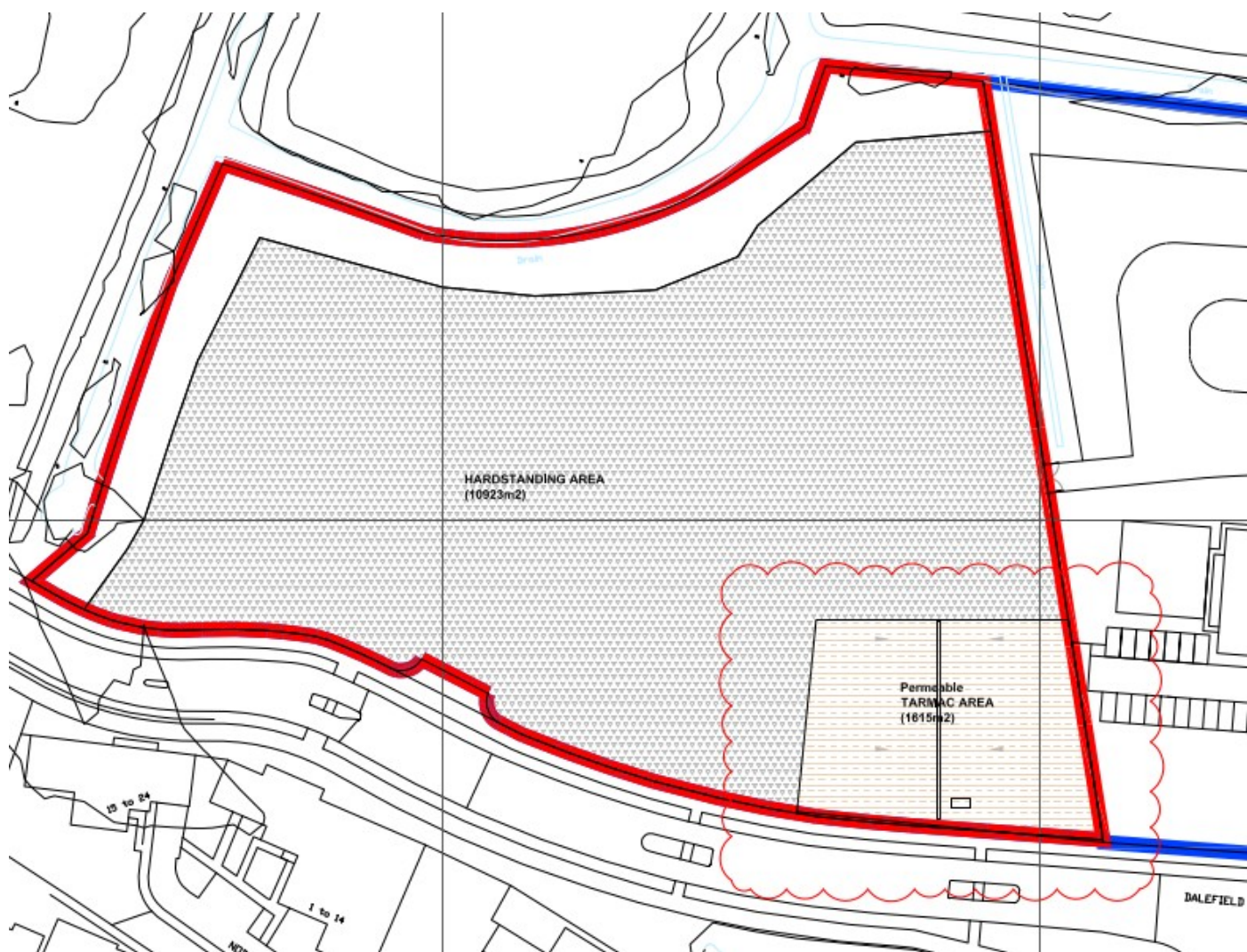
Proposal

This application seeks permission for the use of the land for open storage of construction-related equipment and operations related to Dalefield Way Industrial Park (B8 use) with the associated installation of hardstanding/surface treatment.

The site is enclosed and secured by existing boundary treatment. It has been used historically for overspill open storage for the existing businesses to the east of the site that make up the Dalefield Way Industrial Park for some time, and this application seeks formal permission for this. The main site will therefore be able to operate more efficiently and safely. As a further office building on the main site has also been recently approved, yard space here will be reduced, and this provides further need for the proposed use.

Some additional hardstanding is proposed to facilitate movement into and out of the site and general manoeuvring within it. An area of 1615m² will be tarmacked with a permeable surface and the remainder of the site will comprise a permeable treatment. No new vehicular access is required (access will be through the existing businesses to the east) and no changes to the boundary treatment are proposed.

Proposed Site Layout:



The proposed site layout has been revised through the application process to address KCC Flood and Water comments. The extent of the tarmac area has been reduced by approximately 50% and now includes a permeable pavement solution.

Principle Issues

The site lies within the urban boundary of Gravesend and is designated as a Key Site within the Gravesend Riverside East and North East Opportunity Area. The site is also within Flood Zone 3, which is an area at high risk of flooding, in an area of archaeological potential, and in the Shorne and Higham Marshes Landscape Character Area. As such, the main issues for consideration in the determination of this application are as follows:

- Principle of development
- Design, character and appearance
- Residential amenity
- Parking and highways
- Other material considerations including flooding, biodiversity and archaeology.

Principle of Development

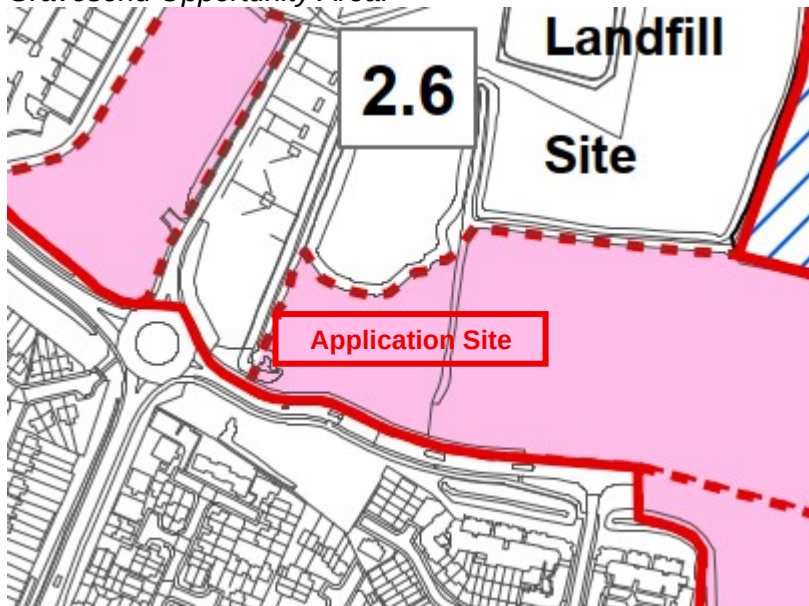
The NPPF 2024 states that planning decisions should help create the conditions in which businesses can invest, expand and adapt. Policy CS02 of the Core Strategy 2014 seeks to retain and improve suitable employment land and to make provisions for at least 186,490sqm gross employment floor space during the plan period. Such development will be distributed throughout the Borough within opportunity areas.



Development is prioritised in these areas.

The application site is within the North-East Gravesend Regeneration Area which is a subsection 2.6 of the Gravesend Riverside East and North-East Gravesend Opportunity Area and therefore Policy CS04 of the Gravesham Local Plan Core Strategy 2014 applies. The policy states that the area will provide around 17,570sqm gross employment floorspace (use classes B1, B2 and B8).

Extract from Gravesham Local Plan Core Strategy 2014: Gravesend Riverside East and North-East Gravesend Opportunity Area:



Policy CS07 seeks to deliver new employment floor space focussing on office, industrial and warehousing development in this opportunity area. Development related to employment within this area is therefore acceptable in principle subject to meeting all the other policy requirements in the Local Plan.

The proposal for storage on this site would therefore comply with the above policy aims for this Opportunity Area and would be acceptable in principle.

Design, Character and Appearance

The proposal site is located on an industrial area of land to the north of Dalefield Way, known as Dalefield Way Industrial Estate, and is currently used for external storage (Use Class B8). This use has occurred gradually since approximately 2019 without the benefit of planning permission. The site is enclosed by high palisade fencing. There are two existing office/workshop buildings up to three storeys in height either side of the entrance into the main industrial estate, and the proposal sites lie to the west of these buildings, with an access into the area from behind the westernmost building. Across the road to the south are modern, three and four storey residential properties. To the west and north of the site lies open, green space, with the South Thames Estuary and Marshes Site of Special Scientific Interest (SSSI) beyond to the north east of the site.

Current Google Earth Image:



Section 12 of the NPPF 2024 relates to achieving well-designed and beautiful places and sets out the Government's requirements in relation to design issues. Paragraph 131 emphasises the importance of achieving high quality, beautiful and sustainable buildings and places. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

Paragraph 135 of the NPPF 2024 also seeks to ensure that development will add to the quality of an area, be visually attractive, and sympathetic to local character and history. Policy CS19 of the Core Strategy 2014 reflects these aims and requires that new development is well designed and respects the character and appearance of the surrounding area.

Paragraph 187 of the NPPF 2024 aims for development to contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and recognising the intrinsic character and beauty of the countryside.

The application site is located in the Shorne and Higham Marshes Landscape Character Area within the Gravesham Landscape Character Assessment (GLCA) 2009 and as such, Policy CS12 of the Core Strategy 2014 is relevant. This policy states that the overall landscape character of the Borough will be conserved, restored and enhanced and that the Gravesham LCA will be taken into account in determining applications. As the site comprises an existing industrial site within the urban boundary, and will be contained by areas of retained vegetation around the site boundaries to the north and west, as well as Dalefield Way to the south and the main industrial site to the east, the proposal will not have any adverse impact on the wider landscape character of the area.

The B8 open storage use for equipment and operations related to the Dalefield Way Industrial Park is in keeping with the existing industrial uses to the east. Views into the site from Dalefield Way are protected from the existing boundary fencing. Whilst not an attractive use, it does fit with the character and use of this side of Dalefield Way, and no objections are raised on this basis.

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.

Neighbouring Properties

The most closely affected properties lie to the south of the site, on the opposite side of Dalefield Way. Due to the distance across the road, the proposed B8 use would not cause any loss of light or privacy, nor have a dominant impact on neighbours.

The main potential amenity effects likely to arise from the proposal relate to environmental impacts, and particularly contamination, air quality, noise and lighting. The Environment Agency (EA) and the Council's Environmental Protection Officer have commented on the proposal, and these comments are incorporated below.

In relation to contamination, a Desk Top Study has been submitted and reviewed by the EA and the Council's Environmental Protection Officer. This recommends a Phase II intrusive assessment of both soil and groundwater. The consultees were satisfied with the submitted information, and contamination conditions have been recommended by both the EA and GBC Environmental Protection.

With regard to air quality, the submitted air quality assessment looks at both construction and operational impacts and has followed appropriate guidance. For the construction phase, with the implementation of dust mitigation measures, the impact found in the assessment was 'not significant'. This can be controlled by way of a Construction Environment Management Plan (CEMP), which can be included in a CEMP condition. Operational impact is not considered to be an issue as there will not be a change of traffic levels to the site. The storage space will be used by vehicles currently using existing storage area on the wider site area.

An Activity Noise Assessment has been submitted. Appropriate background noise levels have been taken over a 4 day period albeit some of the measurements were discarded due to severe/windy weather.

The hours of use in the report are cited as being 08:00 to 18:00, though no days of the week are specified. Noise from the HGV's and telehandlers has been assessed. Use is likely to be for shorter periods of time and intermittent. Due to the existing ambient noise levels during the day, it is unlikely that the noise from the site will be particularly evident/audible at the neighbouring houses.

It would be beneficial to erect an acoustic fence along the Dalefield Way façade of the site in order to minimise the potential for any noise or noise complaints. This can be conditioned. In addition, the hours of operation should be restricted by condition.

Finally, with regard to lighting, as artificial lighting can cause a statutory nuisance under the Environmental Protection Act 1990, it is important that no external lighting that illuminates anything other than the ground within the curtilage of the proposed buildings should be allowed, in order to assist in preventing a nuisance from occurring (which would be most likely if the bedrooms on neighbouring properties are illuminated). Any lighting to be installed must not extend beyond the boundary of the site. A condition should be imposed requiring external lighting details to be submitted for approval prior to installation.

On the basis of appropriate conditions to control the use and help protect neighbouring properties, there would not be any significant impacts on residential amenity, and the proposal would comply with Policy CS19 of the Core Strategy 2014.

Parking and Highways

A Transport Statement has been submitted alongside the application, which demonstrates the proposal would be acceptable with regard to transport impacts. There are no changes to the main access or parking arrangements at the site. The site is in a sustainable urban location, with good links to public transport. As this application is for materials and vehicle storage within the overall Dalefield Way industrial site, there are no staff implications and the proposal will have a very low impact on the local highway network. KCC Highways raise no objection to this application. There have been no neighbour objections in relation to transport matters.

Overall, there would therefore be no adverse parking or highway issues resulting from the proposals, which would comply with Saved Policies T1, T5 and P3 of the Local Plan First Review (1994) and Policies CS11 and CS19 of the Core Strategy 2014.

Any Other Material Planning Considerations

Flooding

The site is located within Flood Zone 3 and a Flood Risk Assessment and Drainage Strategy has been submitted with the application.

The Environment Agency (EA) have no objections with regard to flood risk.

There were initial concerns with the proposal from the KCC Lead Local Flood Authority (LLFA), which led to further flood and drainage work being undertaken by the applicant, and a revision to the block plan to reduce the extent of the tarmac area by approximately 50% and to include a permeable pavement solution. The final comments from KCC LLFA are as follows:

The site covers approximately 1.25 hectares and will comprise two main surface types: 10,923 m² of existing permeable hardstanding, which will be retained and regraded, and 1,615 m² of new permeable tarmac surfacing. The retained permeable area will continue to allow infiltration as it does currently, while the new tarmac area will be positively drained and constructed using a permeable system.

The proposed drainage system discharges to adjacent surface water ditches. Runoff from the new permeable tarmac will be attenuated within a 400 mm thick granular sub-base. Discharge from the site will be restricted to 3.75 litres per second, using a Hydrobrake® flow control device.

The permeable construction consists of open-graded tarmac surfacing over a crushed stone sub-base, with geotextile layers. Additional pollution control measures include a full retention fuel/oil separator and a petrol interceptor at the outfall. While the LLFA raise no objections to this approach, we note that full details of the construction/ design are yet to be produced to cover the permeable surfacing and as such we would request for a detailed design condition to be attached.

On the basis of the revisions to the scheme and appropriate conditions, the proposal is acceptable in flooding and drainage terms and will comply with the requirements of Policy CS18 of the Local Plan 2014 and paragraphs 176 and 181 of the NPPF 2024.

Biodiversity

Paragraph 187 of the NPPF 2024 states that planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and sites of biodiversity. Policy CS12 of the Core Strategy seeks to protect sites designated for their biodiversity value based on their level of importance and enhance, restore, recreate and maintain habitats.

KCC Biodiversity has reviewed the proposal and advised they are satisfied that the conclusions of the submitted Preliminary Ecological Report are valid. They advise that the site has some limited areas of

vegetation that have the potential to support reptiles, breeding birds and foraging/commuting bats, but as these areas are limited, further surveys are not required. Instead, KCC consider any impact can be avoided with the submission of a precautionary mitigation strategy. This should be controlled by an appropriately worded CEMP condition.

The site is within 500m of the South Thames Estuary and Marshes Site of Special Scientific Interest (SSSI) and as it is largely compacted ground and is adjacent to an existing industrial estate, KCC is satisfied that the proposal is unlikely to have a significant impact on the designated site due to loss of habitat or impacts from noise.

The site is also within 10m of a ditch which is connected to the SSSI and it is noted that any drainage has been designed to ensure that any water run-off will not negatively impact the SSSI.

The proposal may result in an increase in lighting that would have the potential to impact wildlife. This should be subject to an appropriate and relevant condition.

Biodiversity net gain is a way of creating and improving biodiversity by requiring development to have a positive impact ('net gain') on biodiversity.

In England, biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This statutory framework is referred to as 'biodiversity net gain' in Planning Practice Guidance to distinguish it from other or more general biodiversity gains.

Under the statutory framework for biodiversity net gain, subject to some exceptions, every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met ("the biodiversity gain condition"). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits.

In this case, the proposed development is covered by an exemption; as the proposal involves a retrospective proposal, BNG is not required in this case.

On the basis of the recommended conditions, the proposal is considered to comply with the requirements of paragraphs 187 and 193 of the NPPF 2024 and CS12 of the Gravesham Core Strategy 2014.

Heritage

The NPPF 2024 places great significance on the desirability of sustaining and enhancing heritage assets, and on new development making a positive contribution to local character and distinctiveness (paragraph 203). This is echoed in Policy CS20 of the Core Strategy 2014, which states that the significance of the Borough's heritage assets and their setting should always be preserved or enhanced. Saved Policy TC7 states that development on important archaeological sites will not normally be permitted.

KCC Heritage has commented that the site lies within an area of multi-period archaeological potential related to this former wetland edge environment. However, based on existing Historic Environment Record data for the area, the past development of the site, and the limited groundworks associated with this development, it is considered unlikely that the proposal would have a significant below-ground archaeological impact.

Conclusion

As a result of the design revisions and additional information, the proposal for this B8 open storage use fits

with the appropriate employment uses for this key site allocated for employment, and the proposal is therefore considered to be acceptable in principle, and in terms of the design and impact on the site itself and the character and appearance of the surrounding area, and with regards to residential amenity, transport, flooding/drainage, biodiversity and heritage matters. The proposal would therefore comply with the requirements of Policies CS02, CS04, CS07, CS11, CS12, CS18, CS19 and CS20 of the Core Strategy 2014, saved Policies TC7, T1, T5 and P3 of the Local Plan 1994, and paragraphs 115, 131, 135, 181, 187, and 193 of the NPPF 2024.

Recommendation

Permission subject to conditions.

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Mrs Katherine Parkin	Team Leader:	Richard Hart
Signed:	<i>K. Parkin</i>	Signed:	<i>R Hart</i>
Dated:	21 January 2026	Dated:	22nd January 2026