

31st March 2025
Our Ref: 24.5039

120 Bermondsey Street
London
SE1 3TX

T 0203 268 2018

Planning and Regeneration Department
Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
DA12 1AU

Dear Rebecca,

**Re: Denton Wharf, Mark Lane, Gravesend, Kent, DA12 2PL – Minor Material Amendment to
Permission Ref: 20240527**

We write on behalf of our client, Denton Wharf Marine Services Ltd, pursuant to Section 73 of the Town and Country Planning Act 1990, seeking minor material amendments to the planning consent relating to the above site granted on 12th August 2024 (ref. 20240527). This application seeks to vary Condition 2 which states.

The development hereby permitted shall be carried out in accordance with the following schedule of approved plans:

- Application form;
- Figure 1 - Feeder Pillar A;
- Figure 1 - Feeder Pillar B;
- Figure 1 - Feeder Pillar C;
- Figure 1 - Feeder Pillar D;
- Figure 1 - UKPNGRP;
- Figure 1 - Site Location Plan;
- Figure 1 - Proposed Site Plan;
- EA Addendum Covering Letter;
- Planning Statement; and
- Flood Risk Assessment.

Reason: For the avoidance of doubt and in the interests of proper planning.

This application follows informal correspondence with Planning Officer Rebecca Harrison who confirmed that a S73 application would be appropriate to facilitate this change

Procedural Matters

As you will be aware, Section 73 of the Town and Country Planning Act 1990 (as amended) empowers a local planning authority to vary or remove conditions associated with a planning permission. This also includes the ability to seek a minor material amendment, where there is a relevant condition that can be varied.



Planning Policy Context

Section 38(6) of the Planning and Compulsory Purchase Act requires that an application for planning permission is determined in accordance with the Development Plan unless material considerations indicate otherwise

Gravesham Borough Council's Development Plan comprises:

- Gravesham Local Plan Core Strategy and Local Plan Policies Map (2014); and
- Gravesham Local Plan First Review (1994) – Saved Policies.

Other material considerations include the National Planning Policy Framework (NPPF) (2024) and the Council's Supplementary Planning Documents (SPDs).

Background

Planning permission (ref. 20240527) was approved for "Construction of DNO kiosks, Low Voltage Cabinets and associated Cabling" in August 2024. As part of this submission, the cabling was proposed to run along the side of the jetty. The majority of this cabling will continue to run down the side of the jetty. This application seeks to amend only a small portion of the cabling (please see updated Site Layout Plan).

Amendment

Policy CS18 'Climate Change' of the GBC Local Plan seeks to reduce the overall carbon footprint of the borough.

Policy CS19 'Development and Design Principles' of the GBC Local Plan requires new development to incorporate sustainable construction techniques, be adaptable to reflect changing lifestyles, and be resilient to the effects of climate change, including delivering carbon reduction. Policy CS19 also requires new development to be visually attractive, fit for purpose and locally distinctive. New development is required to safeguard the amenity of its occupants and neighbouring properties/land.

Following discussions with the Port of London Authority, they have requested the cable design is amended (specifically the portion of cable on the George pontoon) due to the lack of space on the base of the pontoon and the need to mitigate safety risks, as having the cable on the floor could pose a safety risk.

The cable is now proposed to go over the pontoon and not under it as previously designed. The height of the cable is proposed to be 3m and will be installed in the same manner as the existing cables on the Svitzer pontoon (please see Appendix 1). The new design will include support poles holding the cable in place, secured to the base of the pontoon in the same manner as initially planned for the cable. The design of the proposed poles will be the same as the existing poles on the Svitzer pontoon.

As the cabling will remain within the red line boundary and as there is a precedent of raised cabling in this location, we consider this amendment to be minor in nature. This change will not impact the structure or surface drainage properties of the pontoon, and therefore, it will not affect

the flood risk assessment previously completed for the initial design. The benefits of the design modification include preserving space on the base of the pontoon and mitigating against safety risks / potential trip hazards.

In order to amend Condition 2, we have updated the Site Layout Plan to highlight where the cable is now proposed to be raised. In addition, we have prepared two elevations to aid the Council's assessment of the application.

Summary of changes	
Approved Drawings	Proposed Drawings
Figure 1 – Proposed Site Plan	Figure 1 – Proposed Site Plan (Rev B)
Proposed Additional Elevations	
Proposed Royal George Pontoon Elevation (EL-01)	
Proposed Site Elevation (EL-02)	

Conclusion

The proposals have been carefully designed and follow the same manner as the existing arrangement on the Svitzer pontoon. This small amendment will seek to preserve space on the base of the pontoon and responds to the Port of London's request to mitigate against potential trip hazards.

Accordingly, the development is considered to be minor in nature and will not fundamentally change the approved development. The proposals will continue to comply with the aims of Policy CS18 and CS19 set out above and therefore, should be considered acceptable by the Council.

We trust the information is sufficient, however, please do not hesitate to contact us if you have any questions or require any further information.

Yours sincerely



Fiona Duffy
Planner

Tel: 07707171116

Email: fionaduffy@boyerplanning.co.uk

Appendix 1: Svitzer Pontoon Cabling Arrangement

