

Delegated Report

Planning Application

Planning Application No: 20260294

Location: BRT Properties Ltd, Hardys Corner, 2 Vale Road, Northfleet DA11 8BZ

Description: Change of use of part of existing industrial site (B2) to Hand Car Wash Facility (Sui Generis).

Applicant: Mr Z Berisha

Site Visit Date: 2 April 2026

Submitted Documents/Plans

Design and Access Statement

Additional car wash details (DS0714P issue 3)

Noise Report by Coveva

Vehicle Wash Separator

Geo-Environmental Assessment Report by Brownfield Solutions Ltd

Supplementary Phase 2 Site Investigation by Lustre Consulting

Drawing no. DS213-001 (proposed canopy plan and elevations)

Drawing no. DS213-ESP-01 (existing site plan)

Drawing no. DS213-LP-01 (location plan)

Drawing no. DS213-PDP-01 (proposed drainage plan)

Drawing no. DS213-PSP-01 (proposed site plan)

Drawing no. DS213-SPA-01 (swept path analysis)

Relevant Planning History

20250559	Application for a non-material amendment to planning permission reference number 20240998 to allow adjustment of condition 11 to split into two parts to read Prior to the commencement of above ground works (i) a detailed scheme for an air handling system and noise mitigation of associated plant shall be submitted and approved, in writing, by the local planning authority and (ii), prior to the occupation of the building a written commissioning report, from a competent ventilation engineer, shall be submitted after it has been installed to demonstrate that the approved system has been fully implemented and access shall also be granted to an officer of the	Approval of Non-Material Amendment	01.07.2025
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Council to ensure the system is in a suitable working order.

20240998	Application for the variation of condition 2 attached to appeal ref APP/K2230/W/22/3302467 relating to erection of a three storey building with rooms in the roof space to provide 14 x two bedroom self-contained flats, with associated access, car parking, cycle parking, refuse stores and amenity space; to allow the alteration of the design of the windows and different sized dormers and ground floor doors accessing private terraces to be altered to windows and adjust the landscaping to suit.	Permitted	05.03.2025
20211582	Erection of a three storey building with rooms in the roof space to provide 14 x two bedroom self-contained flats, with associated access, car parking, cycle parking, refuse stores and amenity space.	Application Refused	25.05.2022
20190727	Erection of a two storey building with rooms in the roof space to provide 10 x two bedroom self-contained flats, with associated access, car parking and amenity space.	Permitted	29.10.2019
20180023	Redevelopment of the existing site by the erection of 9no. two bedroom houses and 2no. two bedroom self-contained flats, formation of associated access, car parking and amenity space.	Application Refused	30.04.2018

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS07 – Economy, Employment and Skills
- CS11 – Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 - Development & Design Principles

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- T1 – Impact of Development on the Highway Network

- T5 – Access to the identified Highway Network

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 8 – Promoting healthy and safe communities
- Section 11 – Making effective use of land
- Section 12 – Achieving well-designed places
- Section 15 – Conserving and enhancing the natural environment

Supplementary Planning Guidance

- Design for Gravesham: Design Code (2024);
- SPG 4 - KCC Parking Standards (2006);

Emerging Local Plan as a Material Consideration

Paragraph 48 of the Framework makes it clear that planning applications can only be determined in accordance with the development plan, unless material considerations indicate otherwise. An emerging Local Plan, does not form part of the Development. The Framework, at Paragraph 49 allows local planning authorities to give weight to relevant policies in emerging Local Plans, according to:

- The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- The degree of consistency of the relevant policies in the emerging plan to the Framework, the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given to those policies.

West Oxfordshire District Council v Secretary of State for Housing, Communities and Local Government & Rosconn Strategic Land Ltd [2018] EWHC 3065 (Admin) is a High Court judgement that deals with the weight to be given to a Regulation 19 Local Plan. In this judgement the Court found that the weight to be given to an emerging Local Plan, was a matter of planning judgement, which had to be reached having fully considered the relevant part (Paragraph 49) of the Framework.

The Council's emerging Local Plan, is in the process of being consulted upon (it has reached Regulation 19 stage), the Council is not yet aware of whether third parties will support or object to specific policies within the Plan, or whether they will consider the policies with the emerging Local Plan to be broadly sound and consistent with the NPPF (2024). Taking this into consideration, one can only conclude that at this stage of the process, **limited (i.e. minimal) weight should be afforded to the emerging Regulation 19 Local Plan**. This position would only change once the emerging Local Plan has progressed towards submission and examination, with the Council being fully aware of policies that are subject to unresolved objections and with knowledge of policies that have had their soundness and conformity against the Framework challenged.

This approach accords with the approach taken in a separate High Court case, Gladman Developments Ltd v SSHCLG & Corby Borough Council; & Uttlesford DC [2020] EWHC 518 (Admin) and Court of Appeal [2021] EWCA Civ 104, which was also the subject of a Court of Appeal Ruling [2021] EWCA Civ 104.

Consultations, Publicity and Representations

Consultees

Environment Agency (28 April 2026)

Thank you for consulting us on the above application which we received on 7 April 2026. As part of this consultation, we have reviewed the following documents:

- Application form (ref. PP-14778537)
- Drainage Plan (ref. DS213-PDP-01, dated March 2026, by Design Solutions Architecture and Planning)
- Geo-Environmental Assessment Report (ref. PD/C3476/8382 Rev A, dated 14 June 2019, by Brownfield Solutions)
- Supplementary Phase 2 Site Investigation (ref. 3869-210913-ML, dated November 2021, by Lustre Consulting)

Environment Agency position

We object to this proposed development because the information submitted with the application does not demonstrate that the risk of pollution from land contamination to controlled waters is acceptable. We therefore recommend that planning permission is refused in line with paragraphs 187 and 196 of the National Planning Policy Framework (NPPF).

Please refer to the following sections for our full response:

- Section 1: Reasons for, and how to overcome, our objection(s)
- Section 2: Note to the Applicant

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.

Please be aware that we wish to be re-consulted on this planning application once the required information has been submitted. Please also note that our subsequent advice may concern other important environmental issues.

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations.

Section 1: Reasons for, and how to overcome, our objection(s)

Objection: Potential for contamination and risks to controlled waters but insufficient/unsatisfactory information submitted

We object to the proposed development, as submitted, because the information submitted with the application does not demonstrate that the risk of pollution from land contamination to controlled waters is acceptable. We therefore recommend that planning permission is refused.

Reason(s)

The previous use of the proposed development site as a chalk pit and a petrol filling station which included underground storage tanks presents an unacceptable risk of contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are particularly sensitive in this location because the development site is:

- within source protection zone 1
- located upon a principal aquifer

The documents provided within the application do not demonstrate that the risks of pollution have been understood or provide adequate mitigation for the risks presented by the proposed new land use.

The Phase 1 & 2 assessment documents were created for a full redevelopment for residential use. The associated risk assessments have not been designed to reflect the new proposed land use change. Whilst informative, the drainage plan/proposals require some clarity.

In particular:

- The documents provided relate to the previous proposed development and do not detail risks to controlled waters by the now proposed car washing facility
- The Phase 1 & 2 reports are out of date, it is not clear if the current land use/conditions are the same as were reported within the original reports
- The Phase 1 & 2 reports provided detail on risks to controlled waters from intrusive works. It is not clear if any intrusive works are intended for the proposed car washing facility.
- Details on the proposed drainage strategy are conflicting. The application form states that there will be no drainage to the foul sewer however, the drainage plan/drawing indicates surface water will be disposed of via the existing foul sewer.
- The applicant's drainage plan/drawing references an area of permeable surface. We require clarification on this. Due to the high sensitivity of the site and the past land use and remaining underground infrastructure there should be no discharge to ground on site. It is not clear where the car washing run off will be discharged to.

This planning application has therefore failed to meet the requirements of paragraphs 187 and 196 of the NPPF.

Overcoming our objection

The applicant should provide information to demonstrate that the risk to controlled waters has been fully understood and can be addressed through appropriate measures. This should include:

- An addendum to provide updated context of this proposed change of use. It is assumed the intellectual property rights to the Phase 1 & 2 reports have been agreed for use with this application.
- Confirmation on drainage design and what will happen to any car washing run off/trade effluent on site.
- Clarification provided on if the washing area is intended to be on permeable ground.
- Clarification on any intended intrusive works for the development.

Any additional detail should be provided in accordance with the Environment Agency's Land Contamination Risk Management (LCRM) guidance.

The applicant should also refer to Groundwater protection position statements - GOV.UK especially when considering the drainage strategy.

Section 2: Note to the Applicant

Planning advice service

Should you wish us to review any technical documents or want further advice to address the environmental issues raised, we may do this as part of our charged for planning advice service.

Further engagement will provide you with the opportunity to discuss and gain our views on potential options to overcome our objection with us, before formally submitting further information as part of your planning application. 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 £119.37 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 March 2026)

Thank you for consulting us on the above application which we received on 20 March 2026. As part of this consultation, we have reviewed the available documents via the planning portal and specifically the following documents:

- Drainage Plan (DS213 - PDP – 01, March 2026, Design Solutions Architecture and Planning)

Environment Agency position

We object to this application, as its planning application does not demonstrate that the risks of pollution from land contamination to controlled waters are acceptable, or can be appropriately managed with a viable and practicable remediation strategy.

We therefore recommend that planning permission is refused.

Please refer to the following sections for our full response:

- Section 1: Reasons for, and how to overcome, our objection
- Section 2: 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.

Please be aware that we wish to be re-consulted on this planning application once the required information has been submitted. Please also note that our subsequent advice may concern other important environmental issues.

Section 1: Reasons for, and how to overcome, our objection

Potential for contamination and possible risk to controlled waters but no preliminary risk assessment is submitted

- The proposed development site is contaminated land which has been designated as a special site. [and/or]
- The previous use of the development site as an existing industrial site including petrol filling station (B2) presents a high risk of contamination that may mobilise during construction to pollute controlled waters. Controlled waters are particularly sensitive in this location because the site is located:
 - o within source protection zone 1
 - o upon a principal aquifer
- The risk is considered unacceptable because there is no evidence to indicate otherwise.

As the planning application is not supported by an appropriate risk assessment, it does not meet the requirements set out in paragraphs 187 and 196 of the NPPF.

The applicant should submit a preliminary risk assessment which includes but is not limited to a desk study, site walkover, conceptual model, initial risk evaluation, details of any uncertainties, data gaps and limitations, conclusions and justification for the next steps in accordance with the Environment Agency's Land Contamination Risk Management (LCRM) guidance.

This information must demonstrate to the LPA that the risks to controlled waters have been fully understood and can be addressed through appropriate measures. This is supported by our Groundwater Protection Position Statements:

- A2 – Precautionary principle
- A4 – Responsibility for assessments
- A5 – Supply of adequate information
- J3 – Take responsibility and adopt good practice
- J7 – Promote appropriate sustainable remediation

Section 2: Advice to the Applicant/Local Planning Authority

Should you wish us to review any technical documents or want further advice to address the environmental issues raised, we may do this as part of our charged for planning advice service.

Further engagement will provide you with the opportunity to discuss and gain our views on potential options to overcome our objection with us, before formally submitting further information as part of your planning application. 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

Kent Police Designing Out Crime Officer

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 the applicant review current boundary treatments. We advise boundary treatments to be a minimum of 1.8m in height with any support beams facing inwards. We also strongly recommend gating access/egress roads to prevent nuisance parking and misuse out of hours.
2. CCTV is advised for all areas, especially at access/egress points on site, entrance to units associated with this proposal, till areas, storage areas and any areas with limited natural surveillance. Please ensure the CCTV supports the lighting plan.
3. Tills – We advise tills to be stored inside of an associated unit. Cash limits should be kept to a minimum and a suitable management plan should be carefully considered.
4. All associated units should be secured when the site is unattended or out of hours. We strongly recommend alarms, with an auto-dial function, be installed on all external doors, including any emergency

exits.

To note, as Designing Out Crime Officers we use Secured By Design Guidance in our recommendations. Whilst our comments may be standardised within this letter, we encourage the applicant to contact us to discuss the plans in further detail.

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.

KCC Highways and Transportation

Referring to the above description, it would appear that this development proposal does not meet the criteria to warrant involvement from the Highway Authority in accordance with the current consultation protocol arrangements. If there are any material highway safety concerns that you consider should be brought to the attention of the HA, then please contact us again with your specific concerns for our consideration.

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>.

GBC Environmental Protection

Document logged as Noise Assessment by Corveva Group dated 26/06/2026 does not qualify as a noise

impact assessment. It is unclear if the noise measurements were actually taken on site at Vale Road or elsewhere, but regardless, it makes no assessment of the noise on noise sensitive premises in the area.

A full BS4142 assessment is needed in order to fully assess any impact of the car wash facility. It is advised that this is undertaken and submitted for review prior to determination of the application. These types of facility are loud and often result in noise complaints if close to residential properties. There are houses opposite and planning permission has been granted for housing immediately adjacent on the Vale Road site. The NIA should consider both these areas of housing.

The recently submitted contamination assessments are noted, and they relate to a residential end user, so are not entirely relevant to a commercial use. However, the main concern with this type of premises will be any contamination to controlled waters and the Environment Agency is best placed to address this.

Neighbouring properties

The application has been advertised by site notice and individual letters to nine neighbouring dwellings. Two letters of objection have been received and 15 letters of support (two from the same person).

The main concerns from the objectors are:

- Noise and disturbance
- Traffic and highway safety
- Pollution due to run-off water and impact on the environment
- Visual impact and character of the area
- Inadequate mitigation measures (noise, insulation, waste water treatment, traffic management)
- Not demonstrated need/there are already many car washes within 1 mile of the site
- Letters of support are from non-local people

Letters of support

- Good to have since the Morrisons car wash closed

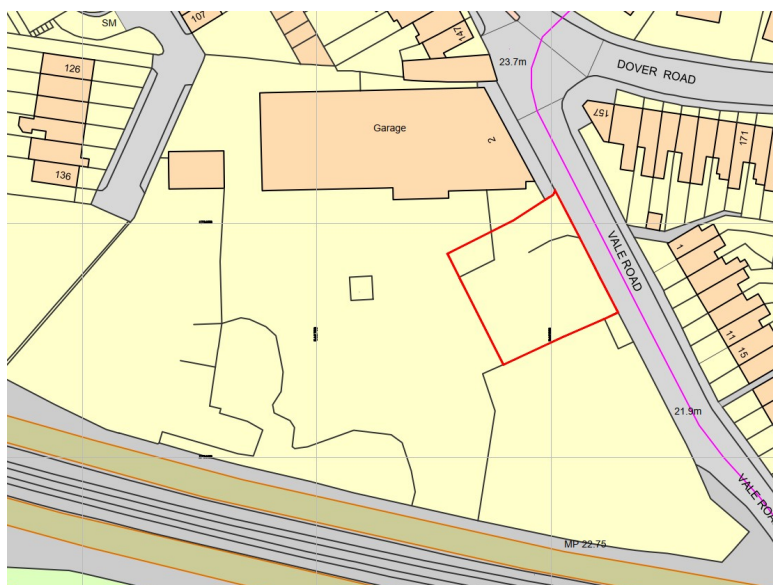
Officer's Analysis

Background

20240998 granted permission for a variation to the allowed appeal reference APP/K2230/W/22/3302467 to allow changes to the design of windows, dormers and ground floor doors. This permission expires on 7 August 2026. The site is outlined in red below:



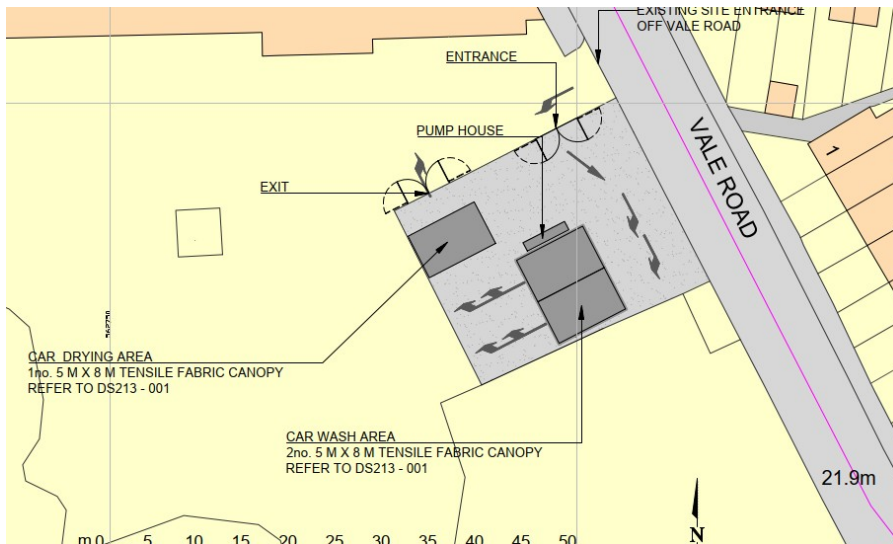
This current application relates to the site shown below:



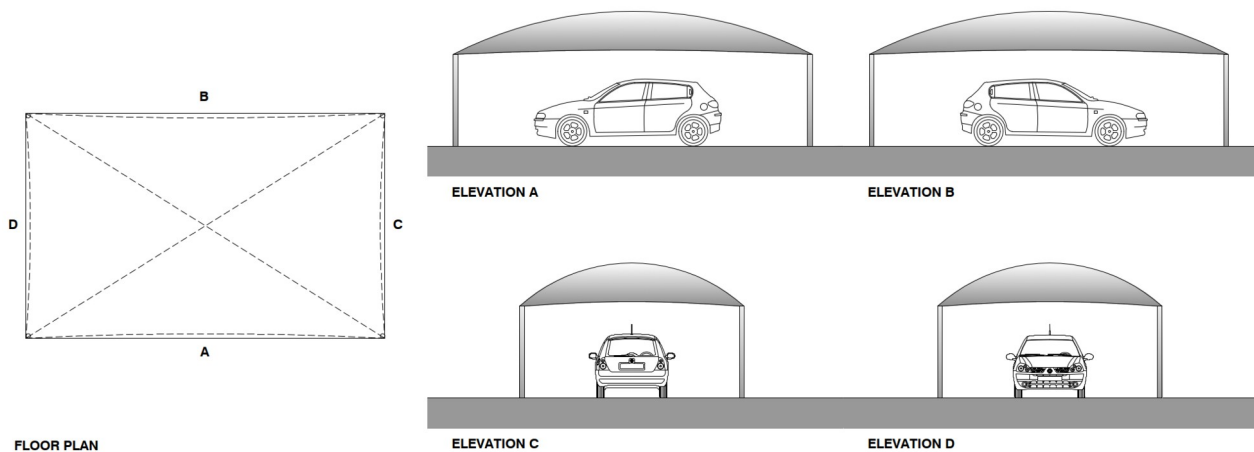
As the red lines for both applications overlap, only one permission could be implemented. Therefore, if permission is granted for this proposed car wash, the residential development could not be implemented as the car park would not be available for the development. As both permissions could not be implemented it is not required to consider the amenity of the future occupiers of the new development.

Proposal

This application seeks planning permission for the change of use of part of existing industrial site (B2) to Hand Car Wash Facility (Sui Generis). The plan below shows the proposed site layout:



The plan below shows the elevations of the proposed car wash:



Principle of Development

This application is located inside the Urban Boundary, where appropriate development would generally be acceptable in principle as per Policy CS02: Scale and Distribution of Development. The site was formerly used for the sale and rental of cars and lorries but has since been cleared. The site is therefore in sui generis use and does not conflict with policy CS07.

However, all other relevant matters should be considered. In this instance, the main points to consider would be the potential impact on; Design, Character and Appearance, Highway safety, and Residential Amenity of neighbours.

Design, Character and Appearance

The wider site is currently a commercial site with a variety of buildings and areas of hardstanding and fencing whilst the application site is open and void of development save for a boundary fence. Opposite the site are two storey Victorian terraced properties with front gardens.

The proposed car wash will be located close to the road and will be readily visible from the street and the properties opposite the site.

A car wash in this location will appear out of character with the more residential appearance of the

surrounding area. Whilst there are commercial buildings close by these are grouped together. A car wash involves a number of structures and therefore sporadic development, on a site which is currently vacant and open. The proposed development will not be visually attractive, fit for purpose or locally distinctive and will not conserve or enhance the character of the local built environment.

The proposal therefore will not accord with the objectives of policy CS19 of the Gravesham Core Strategy 2014 or paragraph 135 of the National Planning Policy Framework 2024.

Amenity

Neighbouring Amenity

Due to the distance the proposed car wash would be away from the nearest properties there will be no detrimental impact in terms of loss of outlook, privacy, sunlight or daylight.

Noise

The use of the land as a car wash will result in an increase in noise. A noise report has been submitted with the application however this is not a noise impact assessment. It is unclear if the noise measurements were actually taken on site at Vale Road or elsewhere, but regardless, it makes no assessment of the level on noise sensitive premises in the area.

A full BS4142 assessment is needed in order to fully assess any impact of the car wash facility. It is advised that this is undertaken and submitted for review prior to determination of the application. These types of facility are loud and often result in noise complaints if close to residential properties. There are houses opposite and planning permission has been granted for housing immediately adjacent on the Vale Road site. The NIA should consider both these areas of housing.

Noise emitted from car washes has been considered by the Planning Inspectorate in appeal reference APP/Q1445/C/2208695 (appendix 1). Where the Inspector wrote:

'Five local residents and two neighbouring businesses object to the development. Whilst I accept that residents living nearby and adjoining businesses can reasonably expect noisier living and working conditions than would be reasonable in a wholly residential area the representations demonstrate that their amenities have been unduly harmed by noise and disturbance. They describe noise from a variety of sources including jet washers, vacuuming equipment and cars. They describe a 7 day a week operation with hours that vary and extend into the evening during good weather. They describe noise that causes a material change in their day to day behaviour such as closing windows and avoiding use of gardens during periods when the noise persists. I found on my site visit that vacuuming and jet washers were noticeably audible in School Road and nearby residential streets but not at the rear of the premises with the rear roller door shut. The noise emitted from the premises unacceptably harms the living conditions of neighbours during normal working hours. Furthermore, the site gives rise to noise at times when other businesses are closed thus prolonging the period during which residents may be disturbed and including on Sundays when car washing is likely to be in demand and background noise levels lower than during the working week.'

The Inspector was also unable to satisfied that any noise attenuation conditions would be practical and would achieve acceptable levels of noise and concluded that *'I cannot be satisfied that conditions could overcome the identified harm to the living conditions of occupiers of adjoining and nearby residential properties by reason of noise and disturbance.'*

The application submission therefore contains insufficient information relating to noise, which is an important consideration, and therefore this aspect of the proposal cannot be assessed and the proposal does not meet the objectives of policy CS19 of the Gravesham Core Strategy 2014 or paragraph 135f of the National Planning Policy Framework 2024 in relation to impact on amenity.

Contamination

The proposal for a car wash has the potential to result in contamination of ground water.

The applicant has submitted a Drainage Plan, Geo-Environmental Assessment Report and a Supplementary Phase 2 Site Investigation. This information relates to a residential development which was approved in 2024 and does not relate specifically to a car wash.

The previous use of the proposed development site as a chalk pit and a petrol filling station which included underground storage tanks presents an unacceptable risk of contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are particularly sensitive in this location because the development site is:

- within source protection zone 1
- located upon a principal aquifer

The documents provided within the application do not demonstrate that the risks of pollution have been understood or provide adequate mitigation for the risks presented by the proposed new land use. The documents relate to the previous proposed development and do not detail risks to controlled waters by the now proposed use.

The Phase 1 & 2 assessment documents were created for a full redevelopment for residential use and are now out of date and are not clear if any intrusive works are intended for the proposed car wash facility.

Details on the proposed drainage strategy are conflicting. The application form states that there will be no drainage to the foul sewer however, the drainage plan/drawing indicates surface water will be disposed of via the existing foul sewer.

The submitted drainage plan/drawing references an area of permeable surface. Clarification is required on this. Due to the high sensitivity of the site and the past land use and remaining underground infrastructure there should be no discharge to ground on site. It is not clear where the car washing run off will be discharged to.

Whilst informative, the drainage plan/proposals require some clarity. The information does not demonstrate that the risk of pollution from land contamination to controlled waters is acceptable.

The submitted information is insufficient and the proposal therefore conflicts with policy CS18 of the Gravesham Core Strategy 2014 and paragraphs 187 and 196 of the National Planning Policy Framework (NPPF).

Ecology and Biodiversity

Biodiversity Net Gain

Biodiversity net gain (BNG) is a way of creating and improving natural habitats. BNG makes sure development has a measurably positive impact ('net gain') on biodiversity, compared to what was there before development.

In England, BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Developers must deliver a BNG of 10%. This means a development will result in more or better quality natural habitat than there was before development.

No details of ecology or habitat have been submitted with the application. As the proposed development does not appear to impact a priority habitat and impacts less than 25sqm of on-site habitat and 5m of on-site linear habitats such as hedgerows the project is likely exempt from BNG.

Parking and Highways

The proposed development will utilise an existing access and therefore no objection is raised on highways grounds.

Conclusion

The proposed car wash, due to the nature of the use and its appearance will neither conserve or enhance the appearance of the surrounding area and nor will it integrate well into the surrounding area and therefore conflicts with the objectives of policy CS19 of the Gravesham Core Strategy 2014 and paragraph 135 of the National Planning Policy Framework 2024.

The submitted application does not sufficiently demonstrate that the proposed car wash will have no detrimental impact on neighbouring amenity in terms of noise and disturbance and therefore is contrary to policy CS19 of the Gravesham Core Strategy 2014 and paragraph 135f of the National Planning Policy Framework 2024.

The submitted application does not sufficiently demonstrate that the risk of pollution from land contamination to controlled waters is acceptable and therefore conflicts with policy CS18 of the Gravesham Core Strategy 2014 and paragraphs 187 and 197 of the National Planning Policy Framework 2024.

Recommendation:

Refuse

(For detailed conditions / reasons for refusal and informatives, see draft Decision)

Case Officer:	Mrs Alison Webster	Team Leader:	Richard Hart
Signed:		Signed:	<i>R Hart</i>
Dated:	11 May 2026	Dated:	11th May 2026