



Delegated Report

Variation of Condition Application

Application No:	20250750
Location:	British Gas Property Division Gas Holder, Canal Road, Gravesend
Description:	Application for variation of condition 2 attached to planning permission reference number 20240960 for change of use to open storage (Use Class B8) with associated works, cycle and car parking; to allow replacement of Flood Risk Assessment & SuDS Strategy Report (FRA20197.1) and Drawing No. AR-XX-XX-XX-DR-0001-003 Rev. D - Proposed Site Plan with revised documents/plans.
Applicant:	-
Site Visit:	N/A Desktop Assessment

Submitted Documents/Plans

- Application Form – dated 24 July 2025;
- Covering Letter by Rolfe Judd (dated 23 July 2025);
- Flood Risk Assessment and SuDS Strategy Report (FRA20197.1) by The PES – dated 11 July 2025;
- Drawing no. AR-XX-XX-XX-DR-0001-003 – Rev. D – Previously Approved Site Plan (scale – 1:500);
- Drawing no. AR-XX-XX-XX-DR-0001-003 – Rev. I – Proposed Site Plan (scale – 1:500).
- ~~Drawing no. AR-XX-XX-XX-DR-0001-003 – Rev. G – Proposed Site Plan (scale – 1:500) – SUPERSEDED;~~
- ~~Drawing no. AR-XX-XX-XX-DR-0001-003 – Rev. H – Proposed Site Plan (scale – 1:500) – SUPERSEDED.~~

Relevant Planning History

Reference	Description	Decision	Decision Date
20240960	Change of use to open storage (Use Class B8) with associated works, cycle and car parking	Permitted	19.03.2025

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale and Distribution of Development
- CS04 – Gravesend East and North-East Gravesend Opportunity Area
- CS07 – Economy Employment and Skills
- CS11 – Transport
- CS12 – Green Infrastructure

- CS18 – Climate Change
- CS19 – Development and 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 9 – Promoting Sustainable Transport
- Section 11 – Making effective use of land
- Section 12 – Achieving Well-Designed Places
- Section 14 – Meeting the Challenge of Climate Change, Flooding and Coastal Change
- Section 15 – Conserving and Enhancing the Natural Environment

Supplementary Planning Guidance

- SPG 4 – KCC Parking Standards (2006)

Consultations, Publicity and Representations

External Consultees

Environment Agency – Having reviewed the proposed amendment to the consented scheme, it appears there are no changes to the drainage strategy nor changes that would affect our position on land contamination at the site.

Therefore, I just wish to reiterate the response we had provided for the parent application (your ref. 20240960) back in November 2024 (our ref. KT/2024/132103/01, attached for ease).

Could you please ensure that the seven conditions and relevant informatives requested within our letter are included again on the decision notice. Looking at the decision notice for 20240960, I note that condition 16 “Piling” is a repetition of condition 15 “Foul drainage”. Grateful if that could be corrected in the new decision notice.

Kent County Council Flood and Water Management – Kent County Council as Lead Local Flood Authority have reviewed the FRA and SuDS Strategy Report prepared by PES dated 11.07.2025 and have the following comments:

It is proposed to manage the surface water for the site through the use of permeable paving prior to a restricted discharge into the watercourse/ ditch on the eastern boundary of the site.

Whilst we were not consulted on application 20240960, we have no objection to the variation of Condition 2. Should the Local Planning Authority be minded to grant permission we would recommend that the following advisories and conditions be attached to any future applications to ensure appropriate consideration to the surface water drainage for the site has been given.

Advisories

1. The area falls within the jurisdiction of the North Kent Marshes Internal Drainage Board therefore we would advise that they are consulted with regards to the proposed watercourse connection also.
2. Within the hydraulic calculations, the rainfall details use Rainfall model FSR with rainfall depth M5-60 of 20.00mm rather than the 26.25mm suggested in the Kent County Council Drainage and Planning Policy. At the detailed design stage, we would expect to see the drainage system modelled using 2022 FeH rainfall data in any appropriate modelling or simulation software. Where 2022 FeH data is not available, 26.25mm should be manually input for the M5-60 value.
3. We expect the hydraulic calculations to demonstrate a CV value of 1.0 for both summer and winter simulations.
4. 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.

5. As part of the detailed design stage, details should be provided to demonstrate that an effective outfall for surface water is provided for the development layout. This information may include details of surveys of watercourses and culverts between the development and receiving network and / or details of any works that may be necessary to deliver an effective outfall for surface water.

Conditions

- a. Development shall not begin in any phase until a detailed sustainable surface water drainage scheme for the site has been submitted to (and approved in writing by) the local planning authority. The detailed drainage scheme shall be based upon the FRA and SuDS Strategy Report prepared by PES dated 11.07.2025. 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 detailed drainage scheme will also be required to demonstrate that any existing surface water flow paths 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.

- b. 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.

Kent County Council Highways – I refer to the above planning application and having considered the development proposals and the effect on the highway network, raise no objection on behalf of the local highway authority.

Internal Consultees

GBC Environmental Protection – There is no objection to this application. Any conditions not yet discharged or ongoing conditions should be re-attached, particularly those relating to contaminated land, CEMP, external lighting, and hours of opening/use/deliveries.

GBC Commercial Health – No objections.

Local Ward Councillors – No comment received.

Neighbouring properties

A notice was displayed on site 07 August 2025.

In addition, nineteen surrounding properties were consulted and no representations were received. The consultation period expired 05 September 2025.

Preliminary Matters

The Environment Agency highlighted that the piling condition recommended in the 20240960 application, was attached in error as a repeat of the Foul Drainage condition. This was raised with the agent who agreed in writing to this being corrected (26/09/2025).

Officer's Analysis

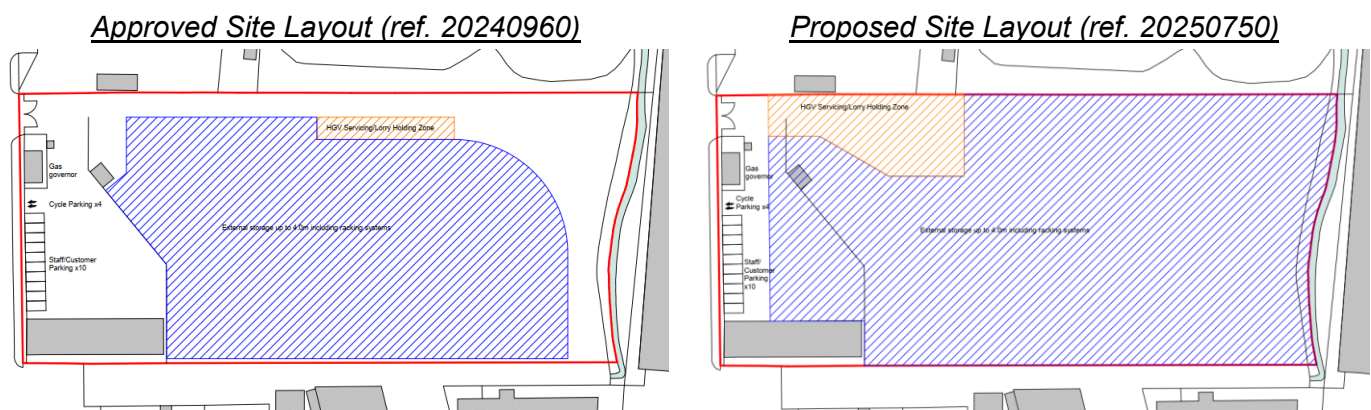
The site lies on the eastern side of Canal Road and previously accommodated two gasholders, which have now been decommissioned and dismantled. The site benefits from planning permission (ref. 20240960) for the "Change of use to open storage (Use Class B8) with associated works, cycle and car parking".

This application seeks to vary condition 2 attached to ref. 20240960, to allow replacement of Flood Risk Assessment & SuDS Strategy Report (FRA20197.1) and Drawing No. AR-XX-XX-XX-DR-0001-003 Rev. D - Proposed Site Plan with revised documents/plans.

For this variation of condition, the core considerations are the Layout and Flood Risk.

Layout

The layout of the site is proposed to change, with a greater extent of the site being utilised for B8 storage use.



The proposed layout retains the approved policy compliant cycle and car parking spaces and does not seek any built development on the site. The proposed layout also provides more space for HGV movements and turning within the site.

Overall, the proposed layout is considered to be acceptable and, subject to conditions, the proposed development is considered to be in accordance with Policy CS19 (LPCS) and Section 12 of the NPPF (2024).

Flood Risk

The updated Flood Risk Assessment (FRA) by The PES (11 July 2025), has been reviewed by the Environment Agency and Kent County Council Flood and Water Management, who have raised no objections, subject to conditions.

Kent County Council Flood and Water Management raised a number of advisories which will be included in the decision notice as an informative. Kent Flood and Water Management requested the following conditions, which were not included in the 20240960 permission:

- 1) *Development shall not begin in any phase until a detailed sustainable surface water drainage scheme for the site has been submitted to (and approved in writing by) the local planning authority. The detailed drainage scheme shall be based upon the FRA and SuDS Strategy Report prepared by PES dated 11.07.2025. 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 detailed drainage scheme will also be required to demonstrate that any existing surface water flow paths 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.

- 2) 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 (2024).

These conditions were agreed in writing with the agent (26 September 2025) and will be attached to the decision notice.

Conclusion

The application has been fully considered and is in accordance with local and national planning policy.

The proposed amendment to the approved Class B8 storage use of the site is not considered to have any detrimental impact on the character of the area, which is industrial in nature. The use would have no impact on the highway network. Furthermore, subject to conditions, the development would safeguard amenity and have no impact through contamination, flood risk or air quality.

Therefore it is recommended that the amendment is approved.

The following conditions will change:

Time Limit

1. The development to which this permission relates must be completed no later than the 19 March 2028.

Reason In pursuance of Section 91 of the Town and Country Planning Act 1990, as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

Approved Plans

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

- Application Form - dated 21 October 2024;
- Covering Letter by Rolfe Judd - dated 18 October 2024;
- Planning, Design and Access Statement by Rolfe Judd (dated 18 October 2024);
- Agent of Change Principle Assessment by Rolfe Judd (dated 16 January 2024);
- Transport Statement by SLR (Vectos (South) Limited - dated 20 March 2024;
- Air Quality Technical Note by The PES (dated 25 March 2024);
- Noise Impact Assessment (ref. J643_R01) by ALN acoustic design - dated 20 March 2024;
- Flood Risk Assessment & SuDS Strategy Report (FRA20197.1) by The PES - dated 11th July 2025;
- Ground Condition Desk Top Study by GCC - dated March 2024;
- Drawing no. AR-XX-XX-XX-DR-0001-001 - Site Location Plan (scale - 1:1250);
- Drawing no. AR-XX-XX-XX-DR-0001-002 - Existing Site Plan (scale - 1:500);
- Drawing no. AR-XX-XX-XX-DR-0001-003 – REV I - Proposed Site Plan (scale - 1:500).

Reason In order to ensure the development is implemented on the basis of the scheme submitted and assessed in the interests of proper planning and in accordance with Policy CS19 (Development and Design Principles) of the Gravesham Local Plan Core Strategy (September 2014).

Further to the changes to the above conditions, the following conditions will change in the new decision notice which have been agreed with the Agent:

Surface Water Drainage

4. Development shall not begin in any phase until a detailed sustainable surface water drainage scheme for the site has been submitted to (and approved in writing by) the local planning authority. The detailed drainage scheme shall be based upon the FRA and SuDS Strategy Report prepared by PES dated 11.07.2025. 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 detailed drainage scheme will also be required to demonstrate that any existing surface water flow paths 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 in accordance with paragraph 182 of the National Planning Policy Framework (2024). 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.

Surface Water Drainage Verification Report

5. 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 (2024).

Piling

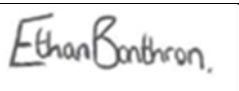
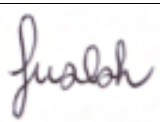
16. Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated by a piling risk assessment that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants in line with paragraph 180 of the National Planning Policy Framework (2024).

Recommendation

Permission

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Mr Ethan Bonthron	Team Leader:	Mrs Faye Walsh
Signed:		Signed:	
Dated:	23 rd October 2025	Dated:	24 October 2025