

Delegated Report

Full Planning Application

Planning Application No:	20241011
Location:	Land and Buildings at Seacon Site, Tower Wharf, Lower Road, Northfleet
Description:	Extension of existing storage warehouse to provide a bagging and packaging facility for aggregates and cementitious products, incorporating extensions to both sides, a new warehouse section to the south and silos to the side.
Applicant:	Mr Lucky Gill, Gill Aggregates (Holdings) Ltd
Site Visit Date:	4 December 2024

Submitted Documents/Plans

Application form
Report on a Phase 2 Geoenvironmental Ground Investigation (Ref. 22/35405-1, dated August 2022)
Noise Assessment (Ref. H4270-NV-v1, dated 5 November 2024)
Air Quality Assessment (Ref. H4270-AQ-v1, dated 5 November 2024)
Drawing no. 20.14/ (Site Plans)
Drawing no. 20.14/ (Existing Block Plan)
Drawing no. 20.14/ (Proposed Block Plan)
Drawing no. 20.14/ (Proposed Plan)
Drawing no. 20.14/ (Existing Elevations)
Drawing no. 20.14/ (Proposed Elevations)

Additional Documents/Plans:
Drawing no. LM25100-XX-D-XX-301 Rev. P01 (Drainage Details Sheet 1)
Drawing no. LM25100-XX-D-XX-302 Rev. P01 (Drainage Details Sheet 2)
Drawing no. LM25100-XX-D-XX-303 Rev. P01 (Drainage Details Sheet 3)
Drawing no. LM25100-XX-D-XX-0100 Rev. P01 (Impermeable Areas Plan Existing and Proposed)
Surface Water Flow Discharge Assessment
Planning Statement Rev. A
Hydraulic Calculations 30.04.2025
Drawing no. LM25100-XX-D-XX-0500 Rev. P03 (Drainage Strategy Plan)
Drainage Strategy Report (Ref. LM25100-DR-01, dated April 2025)

Superseded:
~~Planning Statement~~
~~Drainage Strategy Report (Ref. LM25100-DR-01, dated February 2025)~~
~~Drainage Strategy Plan LM25100-XX-D-XX-0500 Rev. P02~~
~~Hydraulic Calculations 14/02/2025~~

Relevant Planning History

Reference	Description	Decision	Decision Date
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20240466	Application for the approval of conditions 10 and 12 attached to planning permission 20201048 relating to a scheme detailing the proposed hard and soft landscaping associated with the development and an external lighting scheme, excluding street lighting or temporary construction lighting.	Permitted	10.07.2024
20230415	Application for a non-material amendment to planning permission reference 20201048 to allow correction to the existing AOD levels.	Permitted	17.05.2023
20200422	Consultation MLA/2019/00541- Marine Licence.	No objections	07.05.2020
20201048	Construction of replacement river jetty approach (existing landside approach ramp to be demolished - remainder of existing 1950's jetty approach to be retained but retired from use); erection of replacement office/mess facilities to south eastern corner of site and associated re-arrangement of existing employee/guest car park; demolition of existing office, site clearance and works to provide relocated open storage area; and other ancillary works.	Permission	10.05.2021
19960324	Erection of single storey industrial building to form warehouse and erection of temporary warehouse structure.	Permission	04.07.1996
19910781	A) Demolition of existing buildings, land reclamation, construction of two transit ware- houses and gatehouse. B) Outline application for the erection of linked office block.	Permission	02.03.1992
19920585	Display of externally illuminated sign on the south east elevation.	Consent	05.11.1992
19890464	Erection of two storey side extension to form 2 no mess rooms and toilets with offices over.	Permission	03.08.1989
19890099	Erection of detached single storey building to form warehouse, formation and laying out of 305 car parking spaces and 8 lorry spaces.	Permission	05.04.1989
19870960	Erection of a single storey building to form replacement office accommodation	Permission	21.01.1988
19860927	Erection of two storey building to form administration block	Permission	13.01.1987
19840473	Erection of two storey building for use as administration block	Permission	28.06.1984
19810489	Stationing of mobile office for a temporary period of 3 years	Permission	10.06.1981
19810066	External staircase to amenity admin block	Permission	24.02.1981
19800676	Erection of two storey extension to existing administration amenity block for amenity purposes at ground floor level and offices at first floor level	Permission	16.09.1980
19791035	Erection of two storey extension to form enlarged canteen area locker room drying and shower rooms and toilets on ground floor with offices over	Permission	28.12.1979
19790852	Erection of a single storey building to form a warehouse	Permission	11.06.1980
19790717	Erection of a single storey building to form switchroom and storeroom in the north western corner of the Tee Head Jetty	Permission	21.09.1979

19790587	Construction of a T head jetty	Permission	25.07.1979
19770190	Erection of a single storey office building	Permission	27.04.1977
19770097	Erection of a lean-to extension to maintenance workshop	Permission	13.04.1977
19740505	Erection of a metallurgical plant and erection of three extensions to existing plant for stokes charge, shower room and workshop. KCC GRANTED PERMISSION 3.4.1975 (CONDITIONS).	No objections	26.11.1974
19740288	Erection of a building for offices and a flat.	Permission	14.10.1974
19740180	Erection of a security building and gatehouse.	Permission	06.06.1974

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale and Distribution of Development
- CS03 - Northfleet Embankment and Swanscombe Peninsula East Opportunity Area
- CS07 - Economy, Employment and Skills
- CS10 - Physical and Social Infrastructure
- CS11 - Transport
- CS12 - Green Infrastructure
- CS18 – Climate Change
- CS19 - Design and Development Principles

Gravesham Local Plan: First Review (1994)

- T1 – Impact of Development on the 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 (2023), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- Section 2 – Achieving Sustainable Development
- Section 9 – Promoting Sustainable Transport
- Section 11 – Making Effective Use of Land
- Section 12 – Achieving Well-Designed Places
- Section 15 – Conserving and Enhancing the Natural Environment

Supplementary Planning Guidance

- SPG 4 – KCC Parking Standards (2006)
- Design for Gravesham – Design Code (2024)
- Gravesham Landscape Character Assessment (2009)
- South East Inshore Marine Plan (2021)

Consultations, Publicity and Representations

External Consultees

Environment Agency

We have no objections to the proposal, subject to planning conditions being applied to any planning permission granted as set out below.

Please refer to the following section for our full response:

- Section 1: Planning Conditions and Informatives

Flood Risk

We do not object to proposal and do not require any conditions secured to the planning application in order for the development to proceed as it is low risk overall.

Groundwater and Contaminated Land

We consider that planning permission could be granted to the proposed development as submitted if the following planning conditions are included as set out below. Without these conditions, the proposed development on this site poses an unacceptable risk to the environment and we would object to the application.

Land affected by contamination-

Condition 1

No development approved by this planning permission shall commence until a strategy to deal with the potential risks associated with any contamination of the site has been submitted to, and approved in writing by, the Local Planning Authority. This strategy will include the following components:

1. A preliminary risk assessment which has identified:

- all previous uses;
- potential contaminants associated with those uses;
- a conceptual model of the site indicating sources, pathways and receptors;

and

- potentially unacceptable risks arising from contamination at the site.
2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
 3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
 4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.

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 in line with paragraph 187, 196 and 197 of the National Planning Policy Framework.

Condition 2

Prior to any part of the permitted development being occupied a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason

To ensure that the site does not pose any further risk to human health or the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph 187, 196 and 197 of the National Planning Policy Framework.

Condition 3

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 Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

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 from previously unidentified contamination sources at the development site in line with paragraph 187, 196 and 197 of the National Planning Policy Framework.

Surface Water Drainage-

The design of infiltration Sustainable Drainage Systems may be difficult or inappropriate in this location. We therefore request that the following planning condition is included in any permission granted. Without this condition we would object to the proposal in line with paragraph 186 and 196 of the National Planning Policy Framework because it cannot be guaranteed that the development will not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.

Condition 4

No drainage systems for the infiltration of surface water drainage into the ground is 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 that there is no resultant unacceptable risk 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, 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 186 and 196 of the National Planning Policy Framework.

Drainage Informative 1

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.

Foul Drainage-

Condition 5

Development hereby approved shall not commence until a foul drainage strategy, detailing how the developer intends to ensure that appropriate foul drainage is implemented with a connection to foul sewer, has been submitted to and approved by the local planning authority in consultation with the water undertaker and Environment Agency. The development shall be constructed in line with the agreed detailed design and recommendations of the strategy.

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 in line with paragraph 186 and 196 of the National Planning Policy Framework.

Waste on-site Informative 2

The CLAIRE Definition of Waste: Development Industry Code of Practice (DoWCoP, version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste or have ceased to be waste. Under the Code of Practice:

- excavated materials that are recovered via a treatment operation can be re-used on-site providing they are treated to a standard such that they are fit for purpose and unlikely to cause pollution
- treated materials can be transferred between sites as part of a hub and cluster project formally agreed with the EA
- some naturally occurring clean material can be transferred directly between sites.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the 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. It should be noted that re-use of historic landfill materials (including capping materials) is not covered under DoWCoP.

The Environment Agency recommends that developers should refer to:

- the Position statement on the Definition of Waste: Development Industry Code of Practice and;
- The Environmental regulations page on GOV.UK

Waste Informative 3

Contaminated soil that is, or must be disposed of, is waste. Therefore, its handling, transport, treatment and disposal is 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 2010
- 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 waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12 month period the developer will need to register with us as a hazardous waste producer.

KCC Flood and Water Management 21 January 2025

Unfortunately no surface water drainage strategy has been provided for the proposed development. We would therefore recommend the application is not determined until a complete surface water drainage strategy has been provided for review.

At a minimum, a drainage strategy submission must comprise:

- ☐ A location plan
- ☐ A site layout
- ☐ A drainage proposal schematic or sketch
- ☐ A clear description of key drainage features within the drainage scheme (e.g. attenuation volumes, flow control devices etc.)
- ☐ Information to support any key assumptions (e.g. impermeable areas, infiltration rates etc.)
- ☐ Supporting calculations to demonstrate the drainage system's operation and drainage model network schematic
- ☐ Drainage strategy summary form (from our Drainage and Planning Policy Statement)
- ☐ Consideration of key questions and / or local authority planning policy requirements.

Our Drainage and Planning Policy Statement sets out how Kent County Council, as Lead Local Flood Authority and statutory consultee, will review drainage strategies and surface water management provisions associated with applications for major development and should be referred to for further details about our submission requirements. This is available on request, by emailing SUDS@kent.gov.uk.

KCC Flood and Water Management 11 March 2025

Kent County Council as Lead Local Flood Authority have reviewed the Drainage Strategy Report prepared by Leimen LTD (Feb 2025) and have the following comments:

- ☐ It can be noted that the development intends to discharge to an existing surface water sewer. This may be accepted as infiltration will not be possible due to the presence of groundwater several metres above permeable geologies. We do note that Southern Water have been consulted and have requested that Thames Water be contacted. Kent County Council would require evidence of correspondence with Thames Water prior to any progression of this application.
- ☐ Kent County Council would expect to see the drainage system modelled using FeH rainfall data in any appropriate modelling or simulation software. Where FeH data is not available, 26.25mm should be manually input for the M5-60 value, as per the requirements of our latest drainage and planning policy statement (November 2019); the FSR dataset should not be used. Additionally, given that only the impermeable areas have been considered within the hydraulic analysis we would expect for the Cv values for both Winter and Summer simulations to be set to a value of 1.0.
- ☐ 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>.

Can the applicant provide amended hydraulic calculations for the 1 in 30+CC year return period?

Unless the applicant provides additional information responding to the above comments, Kent County Council as Lead Local Flood Authority would not recommend this application be progressed at present.

KCC Flood and Water Management 28 May 2025

Kent County Council as Lead Local Flood Authority have reviewed additional information provided by the applicant and have the following comments:

- ☐ Additional hydraulic calculations have been provided displaying amended CV values and utilising modified rainfall intensities as requested.

Kent County Council as Lead Local Flood Authority would see no further reason to object to the application, however would note the following advisory comments:

- ☐ We note that Southern Water currently have object to the proposals and whilst we accept the reuse of this connection with a reduced outfall rate, the LPA should ensure themselves that Southern Water are

accepting of the principles, and thus, therefore that the proposals can be drained and shall not increase the risk of flooding.

Subject to the LPA being satisfied, we would recommend the following conditions:

Condition:

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 Drainage Strategy Plan prepared by Leimen LTD (Apr 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 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.

This response has been provided using the best knowledge and information submitted as part of the planning application at the time of responding and is reliant on the accuracy of that information.

KCC Heritage

The site lies within an area of multi-period archaeological potential. However, based on existing Historic Environment Record data for the area and the past development of the site, 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 Highway and Transportation 11 February 2025

I refer to the above planning application and in order that I may fully assess the highway implications I shall require further information in respect of:

- ☐ Highway impact of the proposal including any increase in traffic generation
- ☐ Any loss of parking or increase in parking demand
- ☐ Any increase / decrease in staffing numbers including sustainable transport considerations.

I shall also be grateful if you will allow an extension of time to the normal consultation period in order that the highway implications of this proposal can be properly assessed. I will let you have my comments as soon as possible.

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.

KCC Highways and Transportation 17 June 2025

Further to my previous consultation response dated 11th February 2025 in which I requested further information in respect of likely highway impact, it would appear from the amended Planning Statement (Rev A) submitted by the applicant on 12th May 2025 that this application will have minimal impact on the local highway network. I therefore raise no objection to this application.

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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. Please note where there is a mixed-use building, residential and commercial bins must be segregated.

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.

Southern Water

The development site is not located within Southern Water's statutory area for water supply drainage services. Please contact Thames Water the relevant statutory undertaker.

The applicant has not provided details of the proposed means of disposal of foul/surface water drainage from the site. Southern Water is unable to comment fully on this Planning Consultation until such time as the relevant information is provided.

Internal Consultees

GBC Environmental Protection 10 February 2025

The Planning Statement advises that the storage and baggage operations will be internalised which will assist in reducing fugitive dust emission. Although silo connection are said to be enclosed, the outload area where lorries are loaded for onward movement of material is open. This is therefore an area where dust/material can be emitted – during the coupling/uncoupling of the pipe when the silo is filled and possibly via the loading sock filling the lorries. Good management practices and housekeeping will be needed to minimise any issues, and a dust management plan is proposed but has not been submitted.

Although various technical reports (air quality, noise, contaminated land) have been submitted, unfortunately, in spite of requesting the information at the pre-app stage, no information has been provided regarding the process itself. Some information regarding the process has been provided in the air quality assessment. The following was requested at pre-app to be submitted with any full application and this information (listed below) is still needed. In addition, there is no information regarding plant/equipment (including any extension/abatement equipment) to be installed:

- The amount of manufacturing to take place within the facility,
- The quantities of aggregate, sand and gravel that is to be imported into the site,
- The method and details of transportation of imported materials (to include number of vehicle movements),
- The method and details of transportation of the exported concrete blocks (to include number of vehicle movements),
- The size and storage capacity of the silos,
- External storage areas for imported raw materials (this should ideally be internal storage)
- Operating hours,

With regards to the technical reports, the following comments are made:

Contaminated Land

SAS have undertaken a 'Phase 2 Geoenvironmental Ground Investigation' (dated August 2022, report Ref: 22/35405-1). Made ground was found across the site up to 4.0m in some areas. Groundwater was encountered in the boreholes and soil sampling revealed asbestos in 3 boreholes (BH2, 5 and 6). No other contaminants at levels a risk to a commercial end use were found.

Due to the made ground, gas is a risk and elevated levels of carbon dioxide and methane were found – the site being classed as Characteristic Situation 2 (CS2). Gas protection measures are therefore needed.

Controlled waters are also considered at risk of leachate from the made ground. Although levels of contaminants appear to be below EQS levels, advice and recommendations for any conditions should be sought from the Environment Agency on this.

Remediation options have been outlined with the preferred recommended option given in 6.12. A full remediation strategy will therefore be needed. This can be addressed by way of a pre-commencement condition.

Air Quality

The 'Air Quality Assessment' by Hawkins Environment dated 5th November 2024 (Report Ref: H4270-AQ-v1) has been reviewed. Both construction and operational impacts have been assessed. In terms of construction dust impacts, with appropriate mitigation (based on IAQM guidance) impacts are not significant. A construction dust management plan will therefore be needed and can be dealt with by way of a pre-commencement condition.

The operational impact looks at the process itself in relation to sensitive receptors. Due to the distance of these from the installation, the risk of any fugitive dust impacts is negligible. No specific mitigation measures are therefore needed.

An Environmental Permit under the Environmental Protection Act 1990 and Environmental Permitting (England and Wales) Regulations 2016 will be required. This will require the applicant to design the equipment and carry out operations on site in a way that ensures pollution is minimised using Best Available Technology (BAT). The applicant will therefore need to contact GBC Regulatory Services prior to any work being carried out to ascertain what is required and to apply for a permit. The application for this needs to be made at least four months prior to the planned first operation of the development to allow sufficient time for determination. We are unable to assess how the installation is likely to comply with the legislation at this time as insufficient details regarding the process have been submitted. This may result in the process/installation design having to be altered at a later date in order to comply with the Environmental Permitting Regulations.

Noise

A 'Noise Assessment' has been undertaken by Hawkins Environmental dated 5th November 2024 (Report Ref: H4270-NV-v1). A BS4142 assessment has been undertaken and the methodology and findings are accepted. The report demonstrates that noise levels at the nearest residential receptors as a result of the proposed development will be c. 15dB(A) below existing background noise levels. The report advises that no noise mitigation measures are therefore required. However, as no details of plant or equipment have been provided, we are unable to verify this.

More information regarding the process and plant/equipment to be installed as outlined in this response is therefore needed.

GBC Environmental Protection 10 July 2025

Having reviewed the original response dated 10 February 2025, matters regarding air quality and contaminated land were addressed and where needed, conditions are now recommended below.

The Planning Statement has been revised to provide operational information as previously requested. Details regarding the plant/equipment (including any extension/abatement equipment) to be installed do still not appear to have been submitted. The Noise Impact Assessment advises that noise from the process will be 15dB below existing background at the nearest noise sensitive premises, and in the interests of expediency, due to this late response, a noise condition is recommended that will address any noise from plant/equipment.

The applicant is also reminded of the following that was highlighted in the response in February – as far as I'm aware, no contact has been made regarding an Environmental Permit Application:

An Environmental Permit under the Environmental Protection Act 1990 and Environmental Permitting (England and Wales) Regulations 2016 will be required. This will require the applicant to design the equipment and carry out operations on site in a way that ensures pollution is minimised using Best Available Technology (BAT). The applicant will therefore need to contact GBC Regulatory Services prior to any work being carried out to ascertain what is required and to apply for a permit. The application for this needs to be made at least four months prior to the planned first operation of the development to allow sufficient time for determination. We are unable to assess how the installation is likely to comply with the legislation at this time as insufficient details regarding the process have been submitted. This may result in the process/installation design having to be altered at a later date in order to comply with the Environmental Permitting Regulations.

Recommended conditions:

Noise from New Plant/Equipment

Noise and vibration from all plant and equipment when operating at maximum speed and output shall be limited to 10 dB(A) below the background noise level, expressed as a LA90,15minutes at the boundary of

the nearest residential property. The rated noise levels from plant and equipment shall include any penalties for noise characteristics such as tone, intermittency, that are liable to cause the noise to be a nuisance etc.

Contaminated Land

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) until

- a) A remedial strategy, together with a timetable of works, is submitted to the Local Planning Authority for approval. 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.
- b) 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.
- c) 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.
- d) 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.

Watching brief – Contaminated Land

The applicant shall undertake a watching brief during construction in case any contamination issues previously not discovered are encountered. If during development any contamination is found, the local planning authority should be informed as soon as practical and the work shall not continue until written agreement is provided by the LPA as to the appropriate measures to be taken to resolve the matter and they are satisfied that those measures have been carried out.

Construction Method Statement

Prior to the commencement of the development a Construction Method Statement shall be submitted to and approved in writing by the Local Planning Authority. The document shall be produced in accordance with the Code of Construction Practice and BS5228 Noise Vibration and Control on Construction and Open Sites and shall include a Construction Dust Management Plan in accordance with the guidance in the Institute of Air Quality Management (IAQM) 'Guidance on the Assessment of Dust from Demolition and Construction'. The construction of the development shall then be carried out in accordance with the approved methodology.

Neighbouring properties

The application has been advertised by individual neighbour letters to 15 properties. The overall consultation period expired on 4 June 2024.

One letter of representation has been received with the following comments:

- Insufficient information and assessment have been undertaken to allow statutory consultees and the wider public to fully review and consider the implications of the proposal, including design and access, and how the development aligns with the area.
- Proposal is lacking in respect of forthcoming development around the site, which is a material consideration.
- Noise and air quality assessments lack technical rigour to support the assumptions presented.
- Transport impacts should be fully considered and explored through an appropriate level of assessment.
- No flood or drainage information have been provided. There could be increased levels of surface water run off. No demonstration of how risks for flooding will be managed.
- No ecological information has been provided and would be expected given the proximity to a SSSI. The exemption from BNG appears to be incorrect as there are areas of greenscape on the site.
- No energy or sustainability information has been provided, including energy and water consumption.
- No contamination assessment has been submitted and would be expected given the history and industrial nature of the site and wider area.
- There are trees in proximity that may be impacted as a direct result of the proposal. Further information should be provided.
- Unclear if proposals include ventilation and/or extraction equipment and should be provided as appropriate.
- Application 20221064 is a material consideration in the determination of this application. The redline boundary of 20221064 overlaps with the proposal and would necessitate boundary adjustments, which could impact on the extent of open space provided within the scheme and require an amendment to the proposed indicative highway route.

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

Officer's Analysis

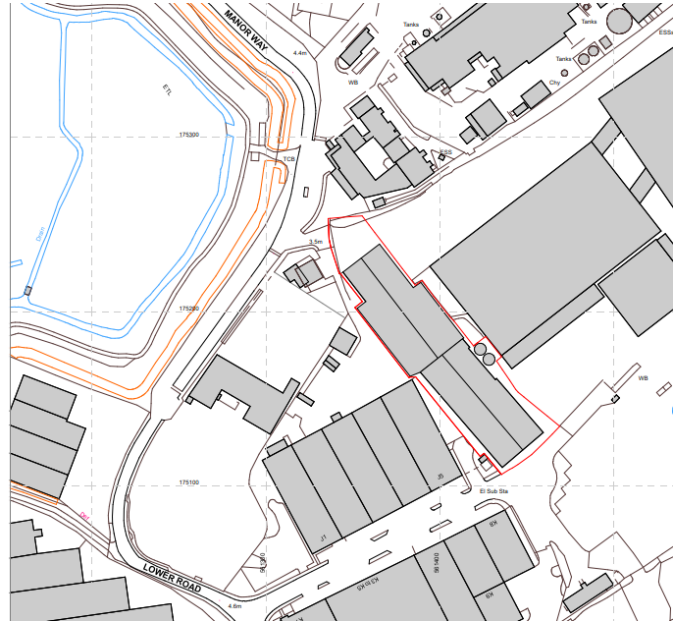
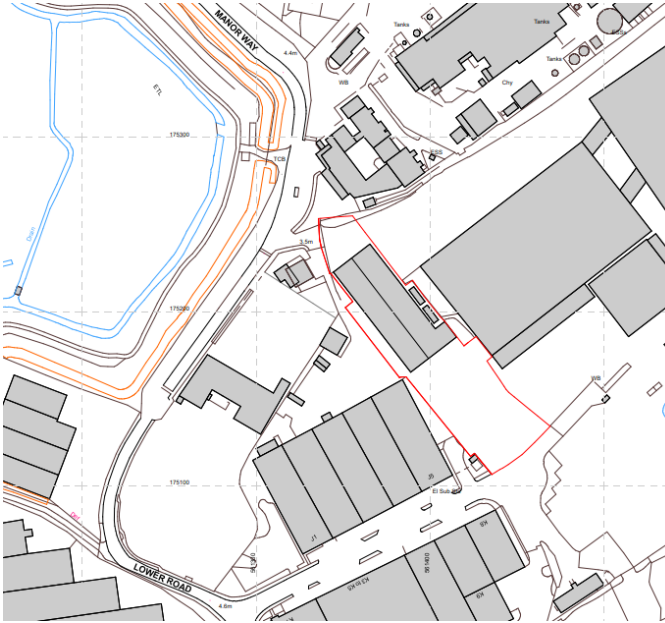
Proposal

This application seeks permission for an extension of an existing storage warehouse to provide a bagging and packaging facility for aggregates and cementitious products, incorporating extensions to both sides, a new warehouse section to the south and silos to the side.

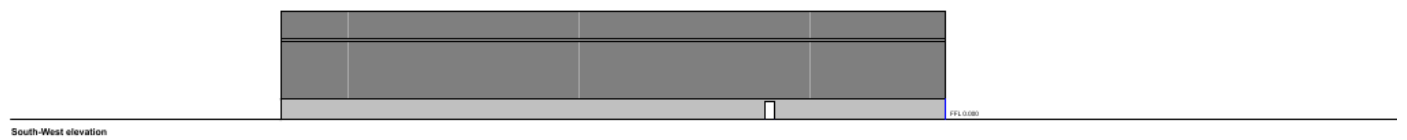
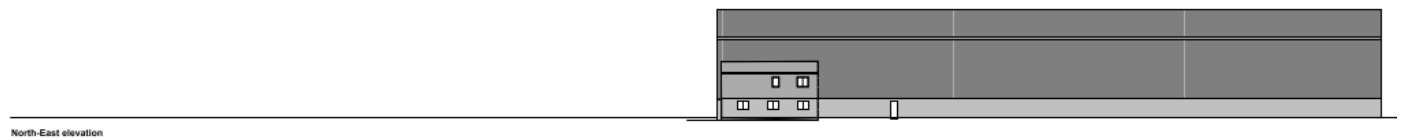
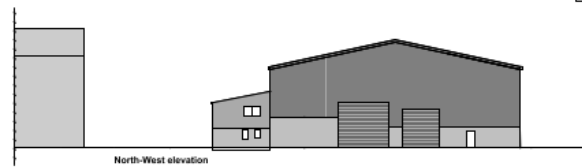
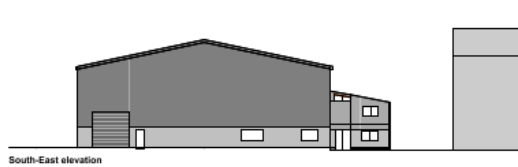
Initially, the application submissions were found lacking in detail with regards to a surface water drainage strategy, and information regarding the manufacturing process and any plant/equipment (including any extension/abatement equipment) to be installed. Further details were submitted as a result.

Existing Site Plan:

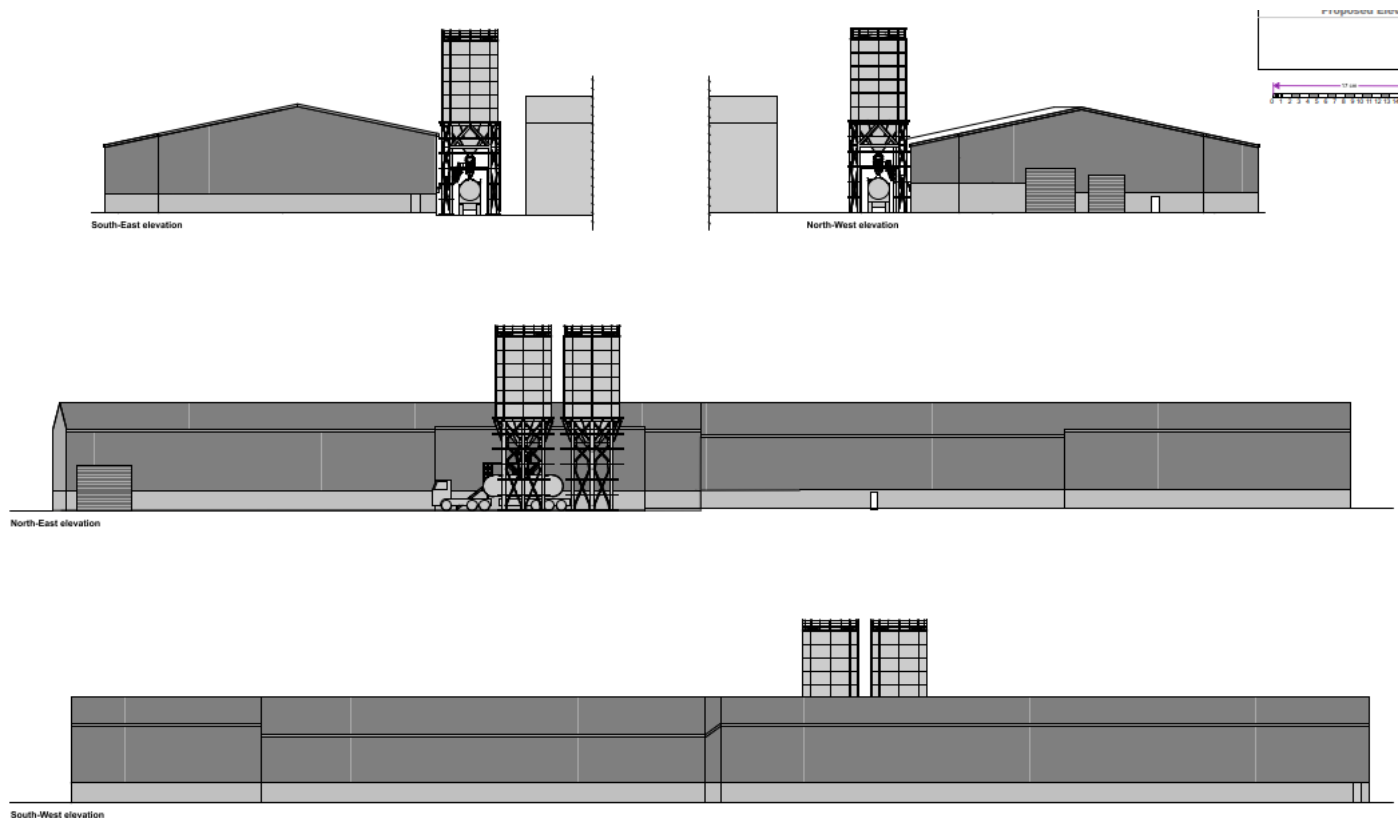
Proposed Site Plan:



Existing Elevations:



Proposed Elevations:



The extensions are designed to match the existing structure in scale, appearance and materials. Brick will be used for the lower part of the building with cladding above (Kingspan KS1000 RW 40mm core).

The application proposal will involve the mechanical bagging of imported aggregates within the proposed extended building. The materials will be brought in by ship to the adjacent Seacon Terminal, with direct internal transfer to the warehouse. The materials will then be exported off-site by third party hauliers and the applicant's fleet using existing access routes. The silos (15m high by 6.7m diameter) will store dry bulk materials.

Principle of Development

The application site is located within the urban boundary of Northfleet and is within the Northfleet Embankment and Swanscombe Peninsula East Opportunity Area, and specifically within the Swanscombe Peninsula East Riverside Industrial Area sub-area. This sub-area comprises mainly industrial and port-related uses that sit behind the existing tidal flood defences. Policy CS03 of the Core Strategy relates to this Opportunity Area. The pre-amble to the policy sets out that the retention and expansion of industrial and port-related employment in this area will be supported. The policy wording states that proposals for the expansion and support of the operation of the industrial area will be supported.

Policy CS07 of the Core Strategy 2014 also supports office, industrial and warehousing development on Key Sites in the Swanscombe Peninsula and Northfleet Embankment Opportunity Area.

The proposal involves the extension of an existing storage warehouse (B8 use) to include further storage plus manufacturing functions with the mechanical bagging of materials as part of Seacon's use of the site. Whilst the use would not remain solely as storage, the additional use fits entirely with the employment use of the site and aligns with the planning policy objectives for this Opportunity Area to expand and support such employment operations.

The principle of development is therefore considered acceptable and complies Policies CS03 and CS07 of

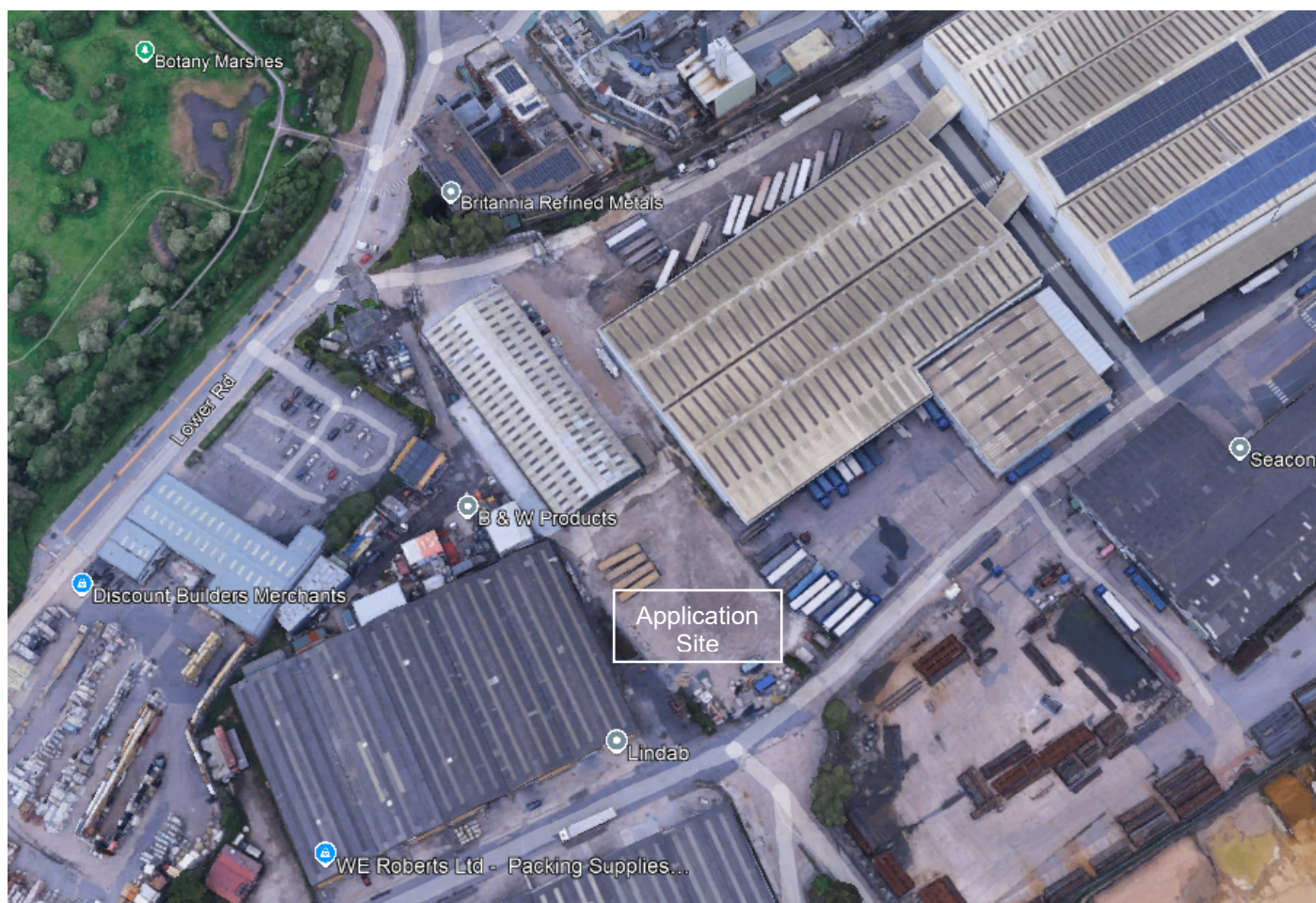
the Core Strategy 2014.

Design, Character and Appearance

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.

The property lies within the urban boundary and comprises a storage warehouse used for container storage, with surface parking to the south-east for freight vehicles. The Seacon site entrance lies to the front of the site, with access to the main Seacon buildings beyond to the north-east. Britannia Refined Metals lies to the north of the site, with its staff car park to the west. Two terraces of industrial units, including Maison Maurice and WE Roberts Ltd, face each other across the road leading to Seacon, to the south-west of the site.



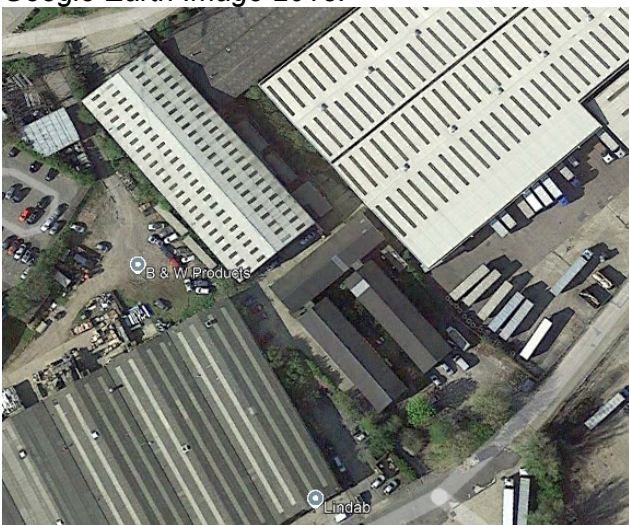


On site, work has already commenced on the proposed development and has progressed to the point of laying of the slab for the extension.

The existing warehouse will have extensions to both sides, a new warehouse section to the south-east and silos to the north-eastern side. The footprint of the building would be more than doubled and it would be set back between approximately 3 and 5m from the roadway.

Historically, the site had buildings on it:

Google Earth Image 2015:



The site had been cleared by 2018, and since then appears to have been used for open storage and parking.

In terms of design, the main extension would match the existing building in scale and appearance. The side extensions would continue the line of the roof slope to each side. The 2 silos would sit to the north-east of the extended building, between it and the larger Seacon storage building to the north-east. Whilst they would be taller than these buildings, due to their position between them, they would mainly be obscured by them. Higher structures such as the silos are also not uncommon around this industrial area.

The proposal has been designed to fit with the existing and surrounding commercial and industrial uses and would therefore respect the industrial character of the area, plus would support and enhance these uses.

Overall, it is considered that the proposal would accord with Policies CS03, CS07, CS11 and CS19 of the Core Strategy 2014.

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, avoid adverse environmental impacts from pollution, and not pose an unacceptable risk or harm to the water environment.

Neighbouring Properties

The existing warehouse and proposed extensions and silos are a sufficient distance away from residential properties that no concerns are raised with regards to impact on neighbouring amenities. The proposal would therefore comply with Policy CS19 of the Core Strategy 2014.

Parking and Highways

The site for the extension was used for storage, as well as some informal lorry and car parking. The wider Seacon site obtained planning permission in 2021 for the erection of replacement office/mess facilities to the south-eastern corner of site with an associated car park and a relocated open storage/parking area under application 20201048. This has provided sufficient space for staff, visitors and freight vehicles to park.



The application submissions have set out the method and details of the transportation of materials to the site, including distribution methods, vehicle movements and means of access, along with operational hours.

Kent County Council have considered these details and conclude that the application will have minimal impact on the local highway network.

There would therefore be no adverse parking or highway issues resulting from the proposal, 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

Environmental Protection

Policy CS18 of the Core Strategy 2014 sets out that the Council will seek to minimise the impact of drainage from new development on waste water systems. Policy CS19 also looks for new development to be located, designed and constructed to avoid adverse impacts from pollution and not pose an unacceptable risk or harm to the water environment.

Initially, the application submissions were lacking in detail with regards to a surface water drainage strategy, and information regarding the manufacturing process and any plant/equipment (including any extension/abatement equipment) to be installed. Further details were submitted during the application process, and the initial issues raised by Kent County Council Flood and Water Management and Gravesham's Environmental Protection teams were satisfied subject to conditions.

Southern Water raised a point about no details of the proposed means of disposal of foul/surface water drainage from the site being provided; however, this is covered by suggested conditions from the EA and Kent County Council Flood and Water Management.

The proposal would therefore comply with Policies CS18 and CS19 of the Core Strategy 2014.

Biodiversity Net Gain (BNG)

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 it is a development below the threshold: it does not impact a priority habitat and impacts less than 25 square metres (5m by 5m) of on-site habitat and 5 metres of on-site linear habitats such as hedgerows. There is no existing 'habitat' on the site. BNG is therefore not required in this case.

Furthermore, even if the above did not apply, as works have already commenced on site the BNG condition would not apply.

Application 20221064 (Northfleet Harbourside)

The 20221064 application for a phased mixed-use redevelopment involving the demolition of existing buildings and structures including site preparation / remediation works, and the development of residential units (Use Class C3), Class E uses including floorspace for retail Class E(a)), food/beverage and drinking establishments (Use Class E(b)), local services (Use Class E(c)), indoor sport/recreation/fitness (use Class E(d)), healthcare space (Use Class E(e)), creche/nursery uses (Use Class E(f)), office floorspace (Use Class E(g)(i)), a new multi-use stadium with associated business and leisure facilities (sui generis), hotel (Use Class C1), community uses floorspace (Use Class F2), plus delivery of open space and realignment of the road network including the A226 Galley Hill Road / Stonebridge Road / Lower Road. This is an undetermined application currently being considered by the Secretary of State through the Public Inquiry

process. The 20221064 application has been raised through a neighbour representation as being a material consideration in the determination of this application.

In terms of the consideration of the current proposal to which this application relates, the application form includes a signed Certificate of Ownership (Certificate A), which demonstrates the applicant is the sole owner of all the land to which the application relates. The proposed plans show no encroachment over the redline boundary.

The 20221064 application is not considered to be material at this point in time, as whilst there is the possibility this site may be developed, there is no extant planning permission and no ownership of the current application site.

Conclusion

The proposal would be acceptable in terms of the objectives of Policies CS03 and CS07 of the Core Strategy 2014, which support industrial and warehousing development in the Swanscombe Peninsula and Northfleet Embankment Opportunity Area. The design of the proposal would respect the industrial character of the area and would also have no adverse impacts with regards to residential amenity and highway matters, as well as environmental protection and biodiversity. The proposals would therefore also comply with the requirements of Policies CS11, CS12, CS18 and CS19 of the Core Strategy 2014, saved Policies T1, T5 and P3 of the Local Plan 1994, and paragraphs 116, 131, 135, 182, 187 and 193 of the NPPF 2024. It is therefore recommended to grant planning permission, subject to conditions.

Recommendation

Planning 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:	15 July 2025	Dated:	17th July 2025