



Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
DA12 1AU

30th September 2021

Dear Sir/Madam

Land between Comma Oil and Treatment Works, Dering Way, Gravesend, Kent

Buchanan Hartley Architects Limited has been appointed by Optimus Access Limited to prepare and submit an application for full planning permission in respect of certain structures erected on the above land. This land has the benefit of planning permission, granted by Notice dated 19th July 2017, for "*change of use of land to Use Class B8 Storage and Distribution together with formation of new access road*" under reference 2016/0114. Condition 13 of the permission holds that "*No buildings, structures, portable buildings or other built development, whether of a temporary nature or not, shall be erected or placed on the land without the prior written permission of the Local Planning Authority having first been obtained.*" It has been brought to the Council's attention that certain structures have been erected in apparent contravention of the permission and this application has been prepared and submitted to seek retrospective permission for said structures.

There are four principal structures present on the land at the time of application, shown on the Block Plan (BHA Drawing 0945 LEX)002):

Structure A – a modular building measuring approximately 17x6m on plan in use as ancillary offices serving the primary use. Above this are positioned three modular site huts in use principally as welfare facilities for staff.

Structure B – a raised open storage platform with flat timber deck

Structure C – a metal clad single-storey shed in use for ancillary storage

Structure D – an open-sided shed also in use for ancillary storage

These structures are all in the same use as the principal land use, being B8 (storage and distribution), in accordance with the principal permission.



The structures are essential to the operation of the business being carried on at this location, in respect of both commercial function, security and health and safety of personnel. They are in all cases the appropriate size and character for their specific function. Their scale, massing and position are proportionate to their individual ancillary uses. In terms of appearance, they have an appropriate industrial aesthetic that in keeping with the immediate setting.

None of the structures has substantial foundations – instead they sit under their own weight directly on the concrete hardstanding covering the plot. None is of a recognisable permanent construction type, instead they are largely formed of temporary scaffolding elements. Their form may be subject to periodic modification in response to the changing needs of the business. In this sense they very much reflect the proper and lawful B8 use of the land. Should the present business relocate, they would undoubtedly be dismantled and moved with the other business chattels.

Notwithstanding the above, this short statement has been written in support of an application for planning permission for their retention in accordance with the conditions of the original planning permission.

Yours faithfully

Matt Hartley RIBA

For and on behalf of Buchanan Hartley Architects