

Delegated Report

Application No: 20250452

Location: Grange Travel Limited Canal Road Gravesend Kent DA12 2RS

Description: Erection of a side extension to portal-framed workshop building.

Applicant: Mr. Adrian Tullett, Grange Travel Coach Hire Ltd

Submitted Documents/Plans

The application comprises the following documents and plans:

- Planning application form.
- Supporting letter (16 April 2025).
- Acoustic Assessment (18 September 2023).
- Flood Risk Assessment (February 2022).
- Drawing no. 1750-101 Rev no. P1 – Site Location Plan.
- Drawing no. 1750-102 Rev no. P1 – Site Block Plan.
- Drawing - Grid-Line Plan (Base Layout).
- Drawing no. 1750-103 Rev no. P1 – Plans and Elevations as Proposed.
- Phase 1 Desk Study (1 April 2024).
- Phase II Geo-Environmental Assessment (14 June 2024).

Relevant Planning History

The planning history relating to this site is summarised below:

<u>Application No.</u>	<u>Description</u>	<u>Status</u>	<u>Decision</u>
20240627	Application for partial approval of condition 2 (parts (a) and (b)) attached to planning permission reference number 20231050 relating to a strategy to deal with the potential risks associated with any contamination of the site.	Permitted	17 October 2024
20231050	Erection of a portal frame shed for servicing and maintaining coaches, including space for an office on a mezzanine floor and storage on the ground floor.	Permitted	14 December 2023
20230239	Erection of a portal frame shed for servicing and maintaining coaches, including space for an office on a	Refused	21 July 2023

	mezzanine floor and storage on the ground floor.		
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Development Plan

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. The Courts have held that it is a matter of planning judgement as to whether a proposal is in accordance with the development plan when 'read as a whole' and conflict with a particular policy or policies may not pass that threshold.

Where there are other material considerations, the development plan should be the starting point, and other material considerations should be taken into account in reaching a decision. One such consideration will be whether the plan policies are relevant and up to date.

In this instance the development plan for Gravesham currently comprises: -

- The Gravesham Local Plan Core Strategy (September 2014);
- Remaining Saved Policies of the Local Plan First Review (1994); and
- The Kent Minerals and Waste Local Plan 2013 - 2030 (2016, revised 2020).

Gravesham Local Plan Core Strategy (September 2014)

- CS01 – Sustainable Development.
- CS02 – Scale and Distribution of Development.
- CS04 – Gravesend Riverside East and North-East Gravesend.
- CS07 – Economy, Employment and Skills.
- CS11 – Transport.
- CS18 – Climate Change.
- CS19 – Development and Design Principles.
- CS20 – Heritage and the Historic Environment.

Saved Policies in the Gravesham Local Plan First Review (November 1994)

- T1 – Impact of Development on the 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 First 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 6 – Building a strong, competitive economy.
- Section 9 – Promoting sustainable transport.
- Section 12 – Achieving well-designed places.

- Section 16 – Conserving and enhancing the historic environment.

Supplementary Planning Guidance

- Design for Gravesham – Design Code SPD (2024).
- SPG 4 - KCC Parking Standards (2006).

Consultations, Publicity and Representations

External Consultees

Environment Agency

Comments 04.06.2025:

Environment Agency Position

We object to this development, as its planning application does not demonstrate that the risks of pollution to controlled waters are acceptable or can be appropriately managed. We therefore recommend that planning permission is refused.

Reason(s)

The previous use of the development site as a historic landfill presents a high risk of contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are particularly sensitive in this location because the site is located upon a principal aquifer overlain by a secondary aquifer.

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 National Planning Policy Framework and CS19 of the Gravesham Local Plan (2014).

Overcoming our objection

The applicant should submit a preliminary risk assessment which includes a desk study, conceptual model and initial risk assessment. This information must demonstrate to the local planning authority that the risk to controlled waters has been fully understood and can be addressed through appropriate measures.

Comments 15.07.2025

As part of this consultation, we have reviewed the following documents:

- Application form, ref. PP-13940401, dated 29 April 2025.
- Site Location Plan, ref. 1750-101 rev P1, dated 16 April 2025, by George Henshaw Ltd.
- Phase I Desk Study, ref. DS-GTCH_001-24, dated April 2024, by G.D. Ground Engineering Services Ltd.
- Phase II Geo-Environmental Assessment, ref. GEO-GTCH_001-24, dated 14 June 2024, by G.D. Ground Engineering Services Ltd.

Environment Agency position

We have no objection to the proposed development subject to the following planning conditions being included in any permission granted.

Section 1: Technical comments

Land affected by contamination

We have reviewed the submitted Phase I Desk Study and Phase II Geo environmental Assessment and consider that they satisfactorily address our concerns raised in our letter dated 4 June 2025 (ref. KT/2025/132567/01-L01).

We therefore withdraw our objection, subject to the conditions set out in Section 2 being included in any permission granted. Without these conditions, the proposed development would pose unacceptable risks of pollution to controlled waters, and we would object to it, in line with paragraph 187 of the National Planning Policy Framework.

Surface Water Drainage

The design of infiltration SuDS may be difficult or inappropriate in this location. We therefore request that a planning condition restricting the infiltration of surface water into the ground is included in any permission granted.

Without this condition we would object to the proposal in line with paragraphs 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.

Section 2: Conditions and informatives

Note to the LPA - Condition wording:

If you wish to amend the wording of our requested conditions or if you wish to merge them with other Local Planning Authority conditions, please contact us to discuss the revised wording.

Condition 1 (Land affected by contamination)

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 of the National Planning Policy Framework.

Condition 2 (Verification report)

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 of the National Planning Policy Framework.

Condition 3 (Unsuspected contamination)

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 of the National Planning Policy Framework.

Condition 4 (Infiltration of surface water)

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.

Informative 1

We consider the Phase I Desk Study (ref: DS-GTCH_001-24, dated April 2024) and Phase II Geo-environmental Assessment (ref: GEO-GTCH-001-24, dated 14 June 2024) produced by G.D. Ground Engineering Services Ltd to satisfy part 1 of Condition 1.

Informative 2

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 or controlled water.

Informative 3

The CLAIRE Definition of Waste: Development Industry Code of Practice (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

Informative 4

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.

Section 3: Advice to the Applicant / Local Planning Authority

Thames Estuary 2100 Plan

The Thames Estuary 2100 Plan (the Plan) sets out how we (the Environment Agency) and our partners can work together to manage tidal flood risk in the Thames Estuary, from now until the end of the century. It is an adaptive plan, ensuring current standards of flood protection provided by the existing tidal defence system are maintained or improved taking into account the effects of climate change e.g. sea level rise. We expect the Thames Barrier to continue to protect London from tidal flooding up until 2070, but over the longer term the Plan sets out the strategic direction and seven end of the century options for managing tidal flood risk in the Thames Estuary. Building a new barrier, with or without locks, within Gravesend Reach is included in these end of the century options. A decision on a preferred option is not planned until about 2040 when such a decision will be informed by the data and information available at the time.

This ongoing work is something the developer should be aware of as their site may be impacted, or in close proximity to works, in the future. We will contact the developer and landowners in the future should a new barrier in Gravesend Reach be taken forward as the preferred option.

Flood risk standing advice

The proposed development falls within Flood Zone 3, which is land defined in the planning practice guidance as being at risk of flooding.

We have produced a series of standard comments for local planning authorities and planning applicants to refer to on 'lower risk' development proposals. These comments replace direct case-by-case consultation with us. This proposal falls within this category.

These standard comments are known as Flood Risk Standing Advice (FRSA). They can be viewed at <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications#when-to-follow-standing-advice>

We recommend that you view our standing advice in full before making a decision on this application.

Flood resistance and resilience

We strongly recommend the use of flood resistance and resilience measures. Physical barriers, raised electrical fittings and special construction materials are just some of the ways you can help reduce flood damage.

To find out which measures will be effective for this development, please contact your building control department. If you'd like to find out more about reducing flood damage, visit the Flood Risk and Coastal Change pages of the planning practice guidance. Further guidance on flood resistance and resilience measures can also be found in:

Government guidance on flood resilient construction

<https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings> CIRIA

Code of Practice for property flood resilience

https://www.ciria.org/Research/Projects_underway2/Code_of_Practice_and_guidance_for_property_flood_resilience_.aspx

Flood risk issues not within our direct remit

The following issues are not within our direct remit or expertise, but nevertheless may be important considerations for managing flood risk for this development. Prior to deciding this application, we recommend that consideration is given to the issues below. Where necessary, the advice of relevant experts should be sought.

- Adequacy of rescue or evacuation arrangements
- Details and adequacy of an emergency plan
- Provision of and adequacy of a temporary refuge
- Details and adequacy of flood proofing and other building level resistance and resilience measures
- Details and calculations relating to the structural stability of buildings during a flood
- Whether insurance can be gained or not
- Provision of an adequate means of surface water disposal such that flood risk on and off-site isn't increased

Note to the Applicant - Planning advice service

Should you wish us to review any technical documents or want further advice to meet the requirements of the conditions recommended, we may do this as part of our charged for planning advice service.

Further engagement will provide you with certainty of our position as to what our response to your planning application will be. 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

KCC Flood and Water Management

As Lead Local Flood Authority, Kent County Council are required to provide technical advice and guidance on the surface water drainage strategies, designs and maintenance arrangement put forward by developers to any new major development.

According to the Town and Country Planning (Development Management Procedure) (England) Order 2010, major development is defined in planning as any development involving any one or more of the following:

- a) The winning and working of minerals or the use of land for mineral-working deposits;
- b) Waste development;
- c) The provision of dwelling houses where:
 - i. The number of dwelling houses to be provided is ten or more; or
 - ii. The development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c) (i);

- d) The provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or
- e) Development carried out on a site having an area of one hectare or more.

The application under the above reference number therefore falls outside the definition of major development and also falls outside of KCC's remit as statutory consultee.

Notwithstanding the above, please feel free to contact us again if you consider there to be local flood risk issues on this site that may require further consideration.

KCC Ecological Advice Service

NO ECOLOGY (NONE NEEDED)

No ecological information has been submitted with this application. As a result of reviewing the data available to us and the information submitted with the planning application, we advise that none will be needed. This is due to the small scale/urban setting of the proposals and limited potential for impacts to protected species. The onsite building is made of corrugated metal which is largely unsuitable for roosting bats.

BIODIVERSITY NET GAIN - DE MINIMIS (APPLICABLE)

Having reviewed the proposals we consider this application to be exempt from mandatory biodiversity net gain, so that mandatory biodiversity net gain of 10% will not apply. We consider this application exempt because:

- The development will not impact any onsite priority habitat; AND
- The development will not impact more than 25 square metres of onsite habitat with a biodiversity value greater than zero; AND
- The development will not impact more than 5 metres of onsite linear habitat.

The site is dominated by hardstanding and it is considered that no habitats with a baseline value higher than zero will be lost to facilitate development.

KCC Heritage

Comments 23.05.2025

The site lies within an area of multi-period archaeological potential and lies over the former line of the mid-19th century Thames and Medway Canal which was filled in during the 1960s and 1970s. The former canal is a heritage asset with below-ground archaeological interest. The proposed extension should seek to avoid below-ground impacts on the remains of the former canal. This may require archaeological field evaluation to determine the extent of the remains of the canal and any associated structures.

I recommend that if planning permission is granted the following condition is applied to any forthcoming consent:

No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of

- i. archaeological field evaluation works in accordance with a Written Scheme of Investigation and timetable which has been submitted to and approved in writing by the Local Planning Authority; and
- ii. following on from the evaluation, any safeguarding measures to ensure preservation in situ of important archaeological remains and/or further archaeological investigation and recording in accordance with a Written Scheme of Investigation and timetable which has been submitted to and approved in writing by

the Local Planning Authority.

Reason: To ensure appropriate assessment of the archaeological implications of any development proposals and the subsequent mitigation of adverse impacts through preservation in situ or by record.

The field evaluation would comprise archaeological trial trenching.

Comments 23.05.2025

The site lies within an area of multi-period archaeological potential. However, based on existing Historic Environment Record data for the area and the relatively limited extent of the proposed works, 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.

Comments 01.07.2025

If the foundation is raft and only max 300mm of made ground to be removed for construction, then the trial trenching would not be needed. I took a precautionary approach as there had been no archaeological mitigation previously and there were no details about foundations (unless I missed them). Also, if the groundworks are limited to the 300mm reduction in the area for the raft foundation then I do not think that mitigation, such as a watching brief during groundworks, would be useful or necessary in this case either.

Internal Consultees

GBC Environmental Protection

This is a similar application to 20231050 and it's noted that the same noise impact assessment has been submitted. I can confirm that no noise complaints have been received regarding the original portal frame building on site and currently in operation. Therefore, comments are much the same as with the earlier application and it's advised that with regards to hours of use, these are the same as for condition 8 of 20231050.

There were some concerns from the EA with regards to groundwater pollution and contamination on the previous application and it's advised that advice is sought from the EA on this matter being the organisation with expertise in this matter.

Neighbouring properties

104 surrounding properties have been consulted. The application has also been advertised by a site notice. No representations have been received.

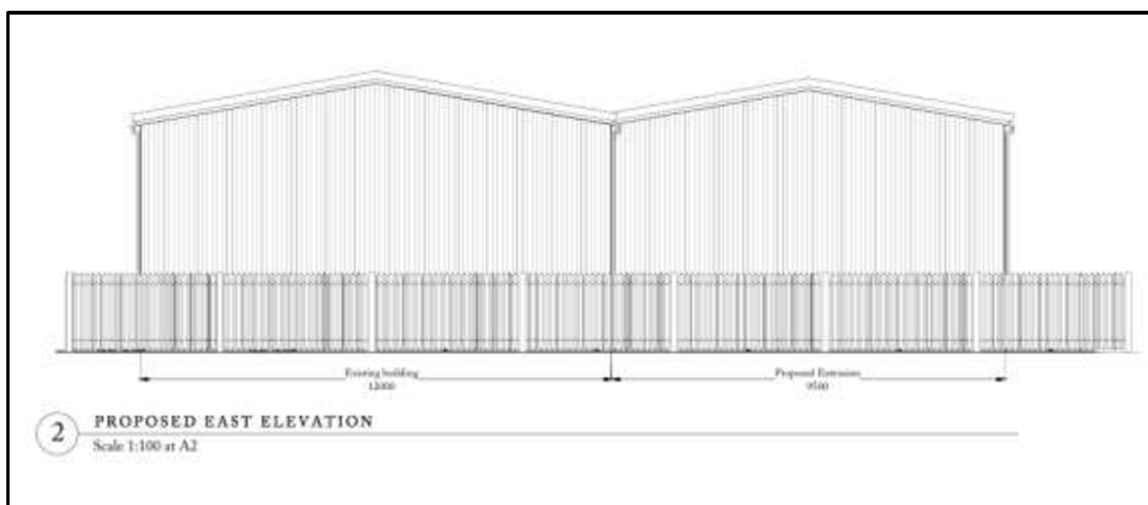
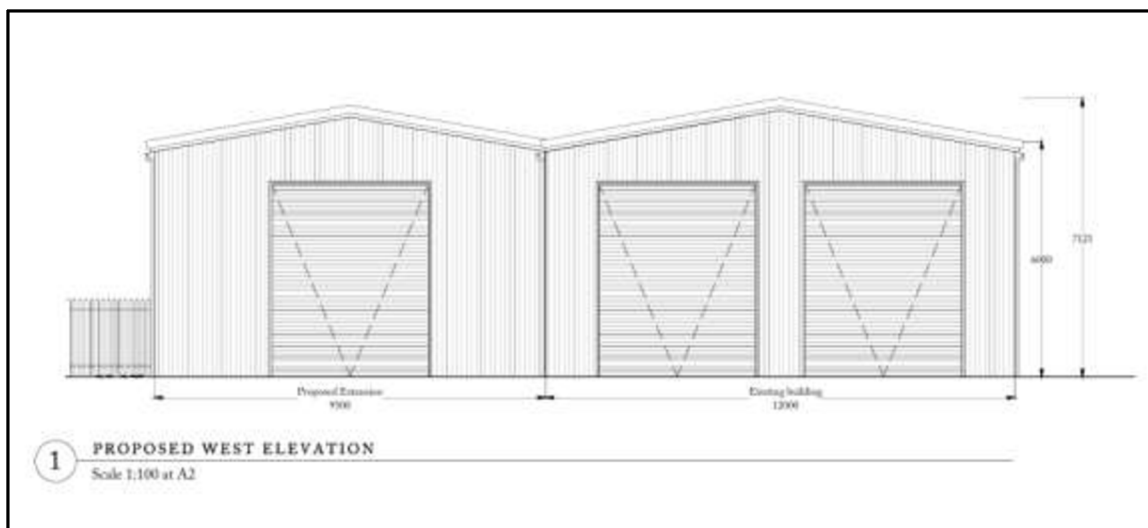
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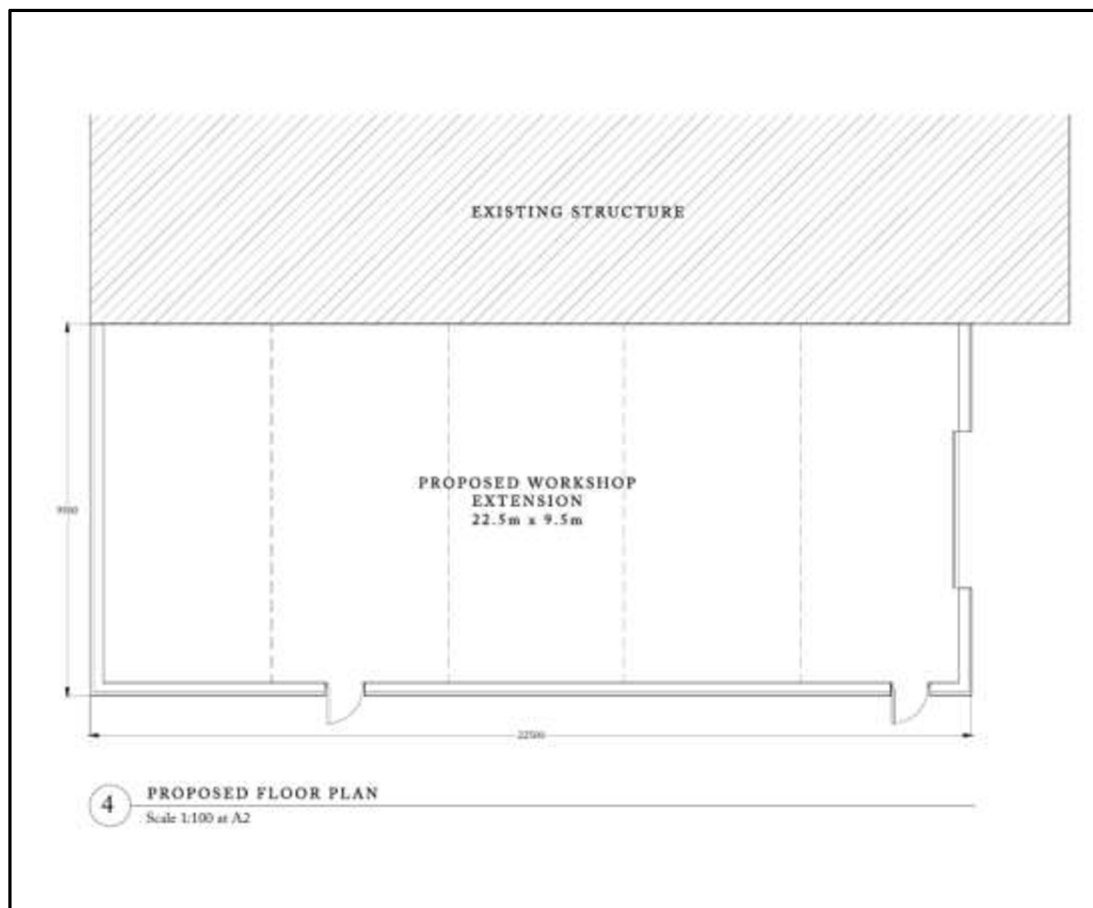
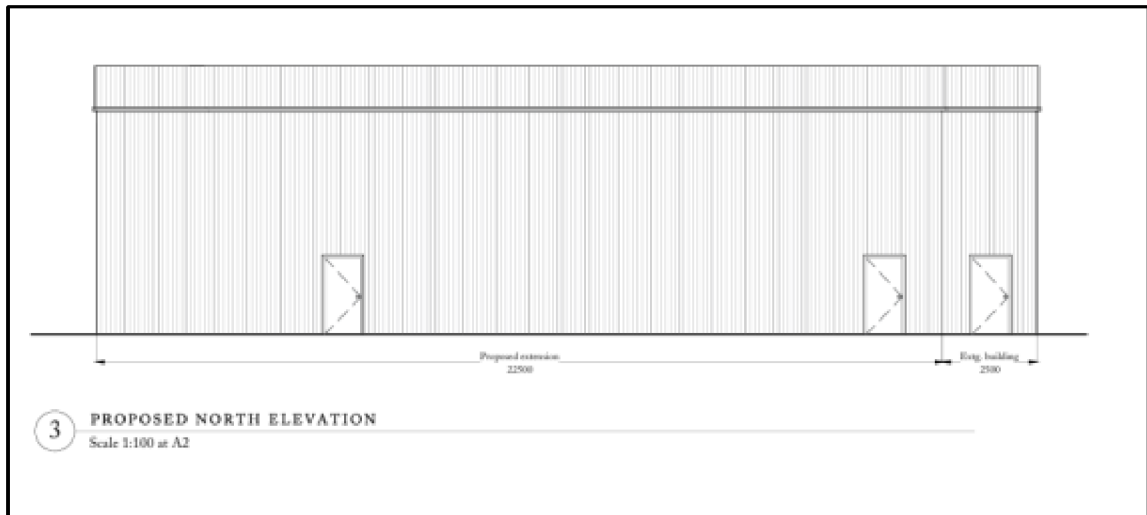
In December 2023 planning permission was granted for "erection of a portal frame shed for servicing and maintaining coaches, including space for an office on a mezzanine floor and storage on the ground floor" (Gravesham planning reference 20231050). The current application seeks to provide an extension to this building. In a supporting letter accompanying this application, the proposal is described as follows:

The existing building, constructed in 2023, measures 25m deep by 12m wide, with an eaves height of 6.0m and a ridge height of approximately 7.1m. The extension is to measure 22.5m deep by 9.5m wide. The extension is to be clad in metal profiled cladding to the walls and roof to match the existing building. There is to be a single roller shutter door

to the western elevation. The building will be used as additional workshop space for maintaining the applicant's fleet of vehicles, which operate from the site.

The proposed elevations and floor plan can be seen in the following extracts from the submitted drawings:





The main planning considerations relating to this application are:

1. Principle of development.
2. Design and visual impact.
3. Impacts on residential amenity.
4. Contamination.
5. Surface water drainage.

6. Flood risk.
7. Highway issues.
8. Ecology and biodiversity.
9. Archaeology.

These issues are assessed below:

Principle of development

The application site is defined on the Policies Map of the Graveland Local Plan Core Strategy as lying within the urban area. Policy CS02 of the Core Strategy “prioritises development in the urban area as a sustainable location for development”. In this respect, there is no objection to the principle of the proposed development.

At a national level, paragraph 85 of the NPPF provides broad support for this proposal. This seeks to support economic growth and activity:

Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

At a local level, broad support for this proposal can be found in Policies CS04 and CS07 of the Local Plan. Policy CS04 provides broad support for employment uses within the Graveland Riverside East and North Graveland Opportunity Area. Policy CS07 provides support for the provision of new employment floorspace over the plan period.

It should also be noted that in the assessment of the planning application for the portal frame shed in 2023 (Graveland planning reference 20231050), no objection was raised to the broad principle of the proposed development.

In light of these considerations, there is no objection to the broad principle of this development provided it meets the requirements of local and national planning policy and guidance.

Design and visual impact

Section 12 of the NPPF relates to “achieving well-designed places” and sets out the Government’s requirements in relation to design issues. Paragraph 131 is particularly relevant:

The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. 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.

The aims set out in paragraph 131 of the NPPF are reflected in Policy CS19 of the Council’s Core Strategy. This requires new development to be “visually attractive, fit for purpose and locally distinctive” and to “conserve and enhance the character of the local built, historic and natural environment”. It also requires new development to “integrate well with the surrounding local area”. In addition, Policy CS19 requires the following:

....the design, layout and form of new development will be derived from a robust analysis of local context and character and will make a positive contribution to the street scene, the quality of the public realm and the character of the area. Account will be taken of the scale, height, building lines, layout, materials and other architectural features of adjoining buildings.

Design for Gravesham (2024) expands on the Core Strategy, and Policy CS19 in particular, to provide additional clarity on what is expected of applicants when submitting design proposals, setting out the minimum requirements to achieve design quality.

The proposed extension is considered to be acceptable in terms of its design and visual appearance. It would match the design of the existing portal frame shed as shown in the extracts from the submitted drawings set out earlier in this report. The application forms also indicate that the materials would match those of the existing building.

The application site is located within an employment area which is characterised by industrial units which have a broadly similar design to the existing building. Many have pitched roofs and metal cladding. As such the proposed development would be in keeping with the character of the surrounding area.

In light of this analysis, it is considered that the proposal would meet the tests set out in the NPPF and Policy CS19 of the Core Strategy.

Impact on residential amenity

Paragraph 135 of the NPPF requires planning decisions to, *inter alia*, provide “a high standard of amenity for existing and future users”. In addition, Policy CS19 of the Core Strategy requires new development to be located, designed and constructed to “safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land”.

The nearest residential properties to the application site are located on the south-eastern side of Canal Road. Due to the separation distance between these properties and the application site, the proposal would not result in a loss of privacy or loss of sunlight/daylight/outlook to existing occupiers.

With respect to noise, a noise impact assessment has been submitted. This is the same as the assessment submitted for application 20231050. The Council’s Environmental Protection Officer has confirmed that no noise complaints have been received relating to the building currently on site and has therefore raised no objection subject to a similar condition as that attached to planning permission 20231050 restricting the hours of operation. This has been added to the recommendation below.

Contamination

Paragraph 196 of the NPPF states decisions should ensure that, *inter alia*, a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation).

At a local level Policy CS19 requires new development to be located, designed and constructed to avoid adverse environmental impacts from pollution, including land contamination.

The application is accompanied by a Phase 1 Desk Study and a Phase II Geo-Environmental Assessment. The Environment Agency has raised no objection on the issue of contamination subject to specified conditions and informatives being added to any planning permission. These have been included in the recommendation below.

Surface Water Drainage

Policy CS19 of the Core Strategy requires new development to be located, designed and constructed to, *inter alia*, not pose an unacceptable risk or harm to the water environment,

including the quality and/or quality of ground waters, surface waters, wetlands and coastal water systems.

The Environment Agency has commented that the design of infiltration SuDS may be difficult or inappropriate in this location. It has therefore requested that a planning condition restricting the infiltration of surface water into the ground is included in any permission granted. This has been added to the recommendation below.

Flood risk

The proposed development falls within Flood Zone 3. A flood risk assessment has been submitted with the current application. This is the same as the assessment submitted for application 20231050.

In the delegated planning report relating to application 20231050 the issue of flood risk was assessed as follows:

The proposed development is defined by Table 2 of the Planning Practice Guidance (PPG) as Less Vulnerable and lies within Flood Zone 3, defined by Table 1 of the PPG as having a 'High Probability' of flooding. Although the site is protected by the Thames Tidal Flood Defences up to a 1 in 1000 (0.1%) chance in any year flood event, it is at risk of flooding if there were to be a breach in the defences.

Whilst the site is at risk of flooding during a breach event, the proposal is less vulnerable and does not propose any sleeping accommodation. The development is sufficiently offset from flood defence assets, within breach extent. The Environment Agency does not have any concerns with the construction of the shed, and it would not be appropriate to request raising finished floor levels.

The EA states that if there were to be a breach in the Thames Tidal Flood Defences during a 0.5% AEP event for the 2115 epoch, the site could face a flood of up to 5.84 mAOD. The ground floor FFLs are approximately 4.84 mAOD which means that there could be a flood depth of 1.00 m.

It is considered that these comments are also applicable to the current application.

The comments of the Environment Agency concerning the use of flood resistance and resilience measures have been noted. An informative relating to this issue has therefore been added to the recommendation.

Highway issues

Policy CS11 of the Core Strategy seeks to ensure that new development mitigates its impact on the highway and that sufficient parking is provided in accordance with adopted parking standards, reflecting the availability of public transport provision and the accessibility of local services and facilities. Saved Policy P3 of the Gravesham Local Plan First Review requires development to make provision for vehicle parking in accordance with the Kent County Council Vehicle Parking Standards.

In a supporting letter, the applicant's agent addresses the issue of highway safety as follows:

The proposal will not reduce the level of vehicle parking on the site as the building is for the covered storage and maintenance of coach vehicles which would otherwise be parked on the site. The site has an established access and the use of the land as a coach yard has been carried on for a substantial period of time.

In the delegated planning report relating to planning application 20231050 the issue of highway safety was addressed as follows:

In terms of parking on site, under the current application it is stated that 19 staff are employed, with 14 car parking spaces and 30 coaches parked on site, although no parking plan has been submitted.

The application also states that the coach drivers park their cars where the coaches are parked. However, to ensure such an arrangement is viable it would generally require a parking/site management plan. This is something that can be conditioned to ensure that parking on site is appropriately managed.

Although a condition was added to the planning permission, it would appear that a management plan was never submitted. In order to address the parking arrangement following the proposed extension it is therefore proposed that a condition requiring a parking/site management plan is added.

Ecology and biodiversity

The KCC Ecological Advice Service has been consulted on this application. They have advised that due to the small scale/urban setting of the proposals and limited potential for impacts to protected species no ecological information would be required.

The KCC Ecological Advice Service has also commented that this proposal would be exempt from the requirements relating to BNG for the following reasons:

- The development will not impact any onsite priority habitat; AND
- The development will not impact more than 25 square metres of onsite habitat with a biodiversity value greater than zero; AND
- The development will not impact more than 5 metres of onsite linear habitat.

Archaeology

The comments of KCC Heritage have been noted. In an email sent on 26 September 2025 the applicant's agent has confirmed that the following:

.....we are using a 200mm raft and so excavation below 300mm is unnecessary

In light of this and the comments of KCC Heritage a watching brief during groundworks would not be necessary.

Other issues

The application was accompanied by drawings showing proposed signage relating to the existing use of the site. The applicant's agent has been advised that signage cannot be considered as part of the current application and that it will be necessary to submit an application for advertisement consent. The agent has confirmed that a separate application will be made.

Conclusion

For the reasons set out in this report, it is considered that the proposed development is acceptable in planning terms subject to the conditions set out in the recommendation below.

Recommendation:

GRANT PLANNING PERMISSION

See draft Decision

Case Officer: Gary Edwards	Team Leader: Richard Hart
Signed: 	Signed: 
Dated: 29/09/2025	Dated: 1st October 2025