

Richard Hart
Gravesham Borough Council

Our ref: KT/2025/132793/02-L01
Your ref: 20250714

Sent by email

Date: 22 October 2025

Dear Richard

Application for approval of condition 4a and 4c attached to planning permission reference number 20231313 relating to a preliminary risk assessment and an options appraisal and remediation strategy.

Eastcourt Marshes Electricity Substation, Mark Lane, Gravesend, Kent DA12 2HN

Thank you for reconsulting us on the above application which we received on 2 October 2025. As part of this consultation, we have reviewed the following documents:

- Contaminated Land Memo, ref. GRR-ATL-SA-GRRS4-ZC-GI-000001, dated July 2025, by Ferrovia Bemo JV
- Geotechnical Interpretive Report, ref. 30003364-MSE-XX-XX-RP-Y-10118, dated 19 October 2023, by Baker Hicks Ltd
- Ground Investigation Report, ref. D2064-22/B, dated July 2023, by Socotec
- Report on a Ground Investigation at Grain to Tilbury Tunnel, ref. TB8754/DRpt01, dated 25 July 2025, by Soil Engineering Ltd

Environment Agency position

We **object** to the proposed discharge of condition 4 parts A and C.

Reasons

The submitted report on Ground Investigation is a factual report only, meaning that it presents raw data obtained from a supplementary site investigation, but is not intended to provide any interpretative comments. Such a report is usually referred to by an environmental consultancy in the development of their own interpretative risk assessments.

No such interpretative risk assessment has been included with this latest submission as found on the Planning Portal. As a result, whilst the report clearly shows that further investigations have occurred, we are unclear as to the extent to which the applicant considers these further investigations have altered the outcomes of the risk assessments already submitted pursuant to this planning application (that we previously reviewed under our letter KT/2025/132793/01-L01 dated 1 September 2025).

We therefore continue to advise that condition 4 parts A and C are not discharged, in line with paragraphs 187, 196 and 197 of the National Planning Policy Framework.

Overcoming our objection

The applicant should provide suitable information to confirm what, if any, amendments to the previously submitted risks assessments are necessary based on the additional ground investigation data collected.

Please note that our comments are based on the details available to us at the time of writing and that we wish to be re-consulted on this planning application once the required information has been submitted. Please also note that our subsequent advice may concern other important environmental issues.

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

Should you have any queries regarding this response, please contact me.

Yours sincerely,

Gabrielle Delorme

Sustainable Places Planning Specialist

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