

Ethan Bonthron
Gravesham Borough Council

Our ref: KT/2025/133004/01-L01
Your ref: 20250258

Sent by email

Date: 30 October 2025

Dear Ethan

Application for variation of condition 2 attached to planning permission reference number 20160114 for change of use of land to Use Class B8 Storage and Distribution together with formation of new access road; to allow for changes to the scale and siting of the approved B8 use class Plots (A, B, C, D and E) informed by the current layouts of occupied Plots A and B, Re-siting the approved shared central roadway via the existing security gate adjacent to Plot B, the central roadway would now be shared solely by Plots B, C, D and E with Plot A retaining independent gated access from the approved access road, as built and some changes to the siting of installations within each plot (e.g. septic tank, refuse points, noticeboards) to better suit the proposed layout and some changes to the siting of slot drains and storm water attenuation sites to better suit the proposed layout.

Dering Industrial Park Dering Way Gravesend Kent

Thank you for consulting us on the above application which we received on 16 October 2025. As part of this consultation, we have reviewed the following documents:

- Proposed Site Layout Plan, ref. DRAW/DW/0325/001/R1, dated 16 October 2025, by Langleys
- Proposed Detailed Layout and Installation Plan, ref. DRAW/DW/0325/002/R1, dated 16 October 2025, by Langleys
- Proposed Surface Water Management Plan, ref. DRAW/DW/0325/003/R1, dated 16 October 2025, by Langleys
- Flood Risk Assessment, ref. FRA/DW/0325, dated 16 October 2025, by Langleys

Environment Agency position

We **object** to the variation of condition 2 due to lack of information and conflicting information.

Please refer to the following sections for our full response:

- Section 1: Reasons for, and how to overcome our objection(s)
- Section 2: Advice to the Applicant

Please note that our comments are based on the details available to us at the time of writing. Please be aware 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
E-mail kslplanning@environment-agency.gov.uk

Section 1: Reasons for, and how to overcome, our objection(s)
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Reason

While we do not object in principle to the site's current/proposed use and the alteration to the site's layout, the current drainage information is conflicting with that provided with the parent application (ref. 20160114). We therefore object to this application until additional information is provided. This is in line with paragraph 187 of the National Planning Policy Framework.

Details around pollution prevention relating to surface water runoff and discharges is not clear/conflicting.

In previously approved drainage plans, we understand that the proposals were for oil separators to be installed across site. The latest Flood Risk Assessment states in section 5.5 (Drainage and pollution control) that 'septic tanks' will be used to 'ensure surface water and tidal waters do not wash contaminants offsite'. While we appreciate the principles between separators and septic tanks are similar, there are differences, and the terminology should not be used interchangeably.

Overcoming our objection

The applicant should clarify the surface water pollution prevention/mitigation on site, and how this conforms to, or deviates, from the previously approved strategy.

Section 2: Advice to the Applicant

Planning advice service

Should you wish us to review any technical documents or want further advice to address the environmental issues raised, we may do this as part of our charged for planning advice service.

Further engagement will provide you with the opportunity to discuss and gain our views on potential options to overcome our objection with us, before formally submitting further information as part of your planning application. 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