

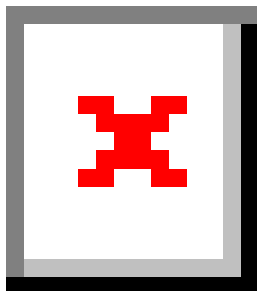
Environmental Protection COMMENTS

Case Number	20250802
Case Officer	Ms Amanda Cue
Address	Blackthorn Farm, Wrotham Road, Meopham, Gravesend, Kent,
Proposal	Outline planning application for up to 100No. residential dwellings (including affordable housing), with all matter reserved except for access and creation of a new access from A227/South Street.
Consultation Expiry Date	25 September 2025
Date of Response	11 September 2025 (JO)

The following comments are made:

Air Quality

The methodology and findings of the Air Quality Assessment (AQA) dated 9th April by SLR (Report Ref: 416.066019.00001) are accepted. The report has assessed construction and operational impacts in line with relevant guidance.



In terms of construction impacts, this could be an issue (medium risk) particularly with regards to fugitive dust emissions without appropriate mitigation. Mitigation measures are given in section 7.1 of the AQA and are based on those in the IAQM guidance. With these in place the impact is considered to be 'not significant'. These can be addressed by way of a condition requiring a Dust Management Plan or can be incorporated into the Construction Environmental Management plan for the development.

Proposed traffic levels (AADT) are below the levels requiring a full/detailed assessment. The development is therefore not considered to be a concern in terms of its impact on the areas. In addition, air quality levels are generally low in this location, so the site is suitable for residential from an air quality perspective. Standard mitigation measures as per the Kent & Medway Air quality Partnership guidance for low Nox boilers and EV charging will be incorporated.

A Damage Cost Assessment (DCA)/Emissions Mitigation Statement has been undertaken with a sum of £25,893 being calculated. Any full application should provide costed on-site mitigation measures (in addition to the standard measures mentioned above) to the sum of the DCA value. This can be addressed by way of a suitably worded condition or a S.106 agreement.

Contaminated Land

A 'Preliminary Risk Assessment' dated 19/03/2025 by IDOM (Report Ref: DS-25054-25-101) has been submitted and reviewed. The site is put at a moderate/low risk in terms of contamination due to past and current use, and an intrusive investigation of soils and groundwater is recommended. Ground gas monitoring is also advised. This is to also include ground gas monitoring. In addition, there is a risk of asbestos containing materials associated with some of the buildings/structures on the site.

This can be addressed by condition.

Noise

SLR have also undertaken a Noise impact Assessment dated 2 June 2025 (Report Ref: 416.066019.00001). Appropriate noise monitoring has been undertaken around the site including close to commercial activity on the norther boundary. The Agent of Change principle has been considered with regards to these and the proposed development. To address this, 2.5m high close boarded/acoustic fencing (of 15kg/m³ mass) is suggested to mitigate noise from Hogarth Tyres along the boundary with the gardens in this area (see page 43).

The main noise source for the rest of the site is traffic noise. The report advises that good acoustic design should be used for the residential units. For example, placing non-habitable rooms such as kitchen/bathrooms closest to the noise source. In addition, specification for the glazing and ventilators have been provide (Table Q) to ensure that internal noise levels in BS8233:2014 are complied with.

Ideally, gardens should achieve a level of 50dB LAeq in order to be compliant with guidance. None should exceed the upper guideline value of 55dB LAeq.

Plant noise levels for mechanical plant such as ASHP, MVHR and MEV have been set as equal to background for existing dwellings and -5dB below background for new dwellings/apartments. It is our standard criteria that all new plant/equipment shdoul be 10dB below existing background.

The above and other matters can be addressed by conditions.

Air Quality mitigation conditions:

1. Costings for proposed measures:

Prior to the operation of the development a costed scheme for proposed on-site air quality mitigation measures to reduce transport related emissions shall be submitted and approved by Environmental Health. The sum of the costed mitigation measures shall amount to no less than £25,893.

2. Air Quality compliance condition:

The development shall deliver and install the agreed on-site air quality mitigation measures, unless agreed otherwise in writing by the Local Planning Authority. As part of this a verification report shall be submitted Local Planning Authority after approved measures have been installed.

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) and if necessary an associated remedial strategy, together with a timetable of works, being submitted to the Local Planning Authority for approval.

a) A site investigation, based on the findings of the submitted 'Preliminary Risk Assessment' dated 19/03/2025 by IDOM (Report Ref: DS-25054-25-101), shall be carried out by a suitably qualified and accredited consultant/contractor in accordance with a Quality Assured sampling and analysis methodology.

b) A site investigation report detailing all investigative works and sampling on site, together with the results of analysis, risk assessment to any receptors and a proposed remediation strategy shall be submitted to the Local Planning Authority. 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.

c) 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.

d) 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.

e) 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.

Noise

An assessment shall be carried out and submitted to the LPA for approval demonstrating that:

- The internal ambient noise levels in all habitable rooms of the proposed residential dwellings shall not exceed the guideline LAeq values found in Table 4 of BS8233:2014.
- The maximum internal noise levels in all habitable rooms should not exceed 45dB LAmax more than 10 times per night in accordance with the Professional Practice Guidance on Planning & Noise and the WHO Guidelines for Community Noise.

Where compliance with these criteria will rely on closed windows, the development must include sufficient and suitable ventilation to affected residential dwellings by means other than opening windows to ensure that the internal noise levels required by the above conditions can be retained all year round.

Plant/Equipment Noise Levels

The rating noise from fixed building services/mechanical plant/equipment associated with the development shall be at least 10dB below the existing LA90 background level at the nearest noise sensitive receptors (i.e. dwellings) when measured and assessed in accordance with BS4142:2014

Code of Practice on Construction and Demolition

Please apply as appropriate and this should make reference to the dust mitigation measures as detailed in section 7.1 of the Air Quality Assessment (AQA) dated 9th April by SLR (Report Ref: 416.066019.00001).

Lighting

Artificial lighting can cause a statutory nuisance under the Environmental Protection Act 1990. It is important that the applicants are not permitted to install external lighting that illuminate anything other than the ground within the curtilage of the new properties in order to assist in preventing a nuisance from occurring (which would be most likely if the bedrooms on neighbouring properties are illuminated).