

Katherine Parkin
Gravesham Borough Council

Our ref: KT/2025/132914/01-L01
Your ref: 20250864

Sent by email

Date: 03 October 2025

Dear Katherine,

Retrospective change of use of the land and building(s) to offices with hard surfacing to create additional parking/delivery area.

Walnut Hill Nursery, Walnut Hill Road, Gravesend, Kent DA13 9HL

Thank you for consulting us on the above application which we received on 15 September 2025. As part of this consultation, we have reviewed the following documents:

- Application form, ref. PP-14284288, dated 29 August 2025
- Site location plan, drawing no. 01, dated 09 July 2025, by GSP
- Phase I Geo Environmental Desk Study and Preliminary Risk Assessment, ref. 4244/25, dated July 2025, by R. Carr Geotechnical Services

Environment Agency position

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

Please refer to the following sections for our full response:

- Section 1: Technical comments
- Section 2: Conditions & Informative
- Section 3: Advice to the Applicant

Please note that our comments are based on the details available to us at the time of writing. If any subsequent changes are made to the application, please reconsult us.

Decision notice

In accordance with the planning practice guidance ([determining a planning application, paragraph 019](#)), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

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: Technical comments

We have reviewed the Phase I Geo Environmental Desk Study and Preliminary Risk Assessment that has been submitted in support of this planning application. Please note that our comments are related solely to the protection of the water environment in the vicinity of the site.

We are satisfied with the completed assessment and conclusion that risks to controlled waters from previous uses of the site are unlikely.

We do however recommend the inclusion of an 'unsuspected contamination' condition.

Surface water run-off from the HGV parking area may contain hazardous pollutants and as such any discharge to ground from these areas would be subject to risk assessment with acceptable effluent treatment provided.

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 statutory consultees/Local Planning Authority conditions, please contact us to discuss the revised wording.

Condition 1 (Previously Unidentified 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 LPA) shall be carried out until further investigation and a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the LPA. The remediation strategy shall be implemented as approved.

Reason: To ensure that the development does not contribute to, and 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. This is in line with paragraph 187 of the NPPF.

Condition 2 (Infiltration of surface drainage)

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 paragraphs 186 and 196 of the National Planning Policy Framework.

Informative

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, a controlled water.

Section 3: Advice 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